



August 13, 2021

COPY SENT VIA EMAIL: DavidBlack@co.imperial.ca.us

Governor's Office of Planning & Research

August 13 2021

STATE CLEARINGHOUSE

Mr. David Black
Imperial County
Planning and Development Services Department
801 Main Street
El Centro, CA 92243

Dear Mr. Black:

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE ENERGY SOURCE MINERAL ATLiS PROJECT; IMPERIAL COUNTY, CALIFORNIA STATE CLEARINGHOUSE (SCH) #2020120143

Thank you for including the Department of Conservation's Division of Mine Reclamation (Division) in the environmental review process for the Energy Source Mineral ATLiS Project (Proposed Project) Draft Environmental Impact Report (Draft EIR) released on June 28, 2021. The Draft EIR indicates that Imperial County (County), as lead agency under the California Environmental Quality Act (CEQA), prepared and circulated an Initial Study and Notice of Preparation for the Proposed Project on December 8, 2020, to agencies and the public to review and provide comment; the Department of Conservation did not receive this document. Comments from this process were considered and used in preparation of this Draft EIR.

As described in the Draft EIR, the Proposed Project would construct and operate a commercial lithium hydroxide production plant within the Salton Sea geothermal field in the County. Specifically, the Proposed Project would consist of:

- Construction and operation of a facility (the ATLiS plant) to extract lithium, manganese, zinc, and other commercially viable substances from geothermal brine from the neighboring Hudson Ranch Geothermal Plant (HR1) and process the extracted substances to produce commercial quantities of lithium and, to the extent possible, manganese, zinc, and other products.
- Construction and operation of brine supply and return pipelines and other associated interconnection facilities with the HR1.
- Construction of a primary access road from McDonald Road (approximately 500 feet west of the HR1 entrance), a second primary access about 800 feet west, and an emergency access entrance only from Davis Road.
- Paving of McDonald Road from State Route 111 (Highway 111) to English Road (approximately 2 miles).
- Construction of a power inter-connection line from the Imperial Irrigation District (IID) and HR1 switchyard located at the northeast corner of the HR1 site.

Mr. David Black
ATLiS - DMR CEQA Comment Letter
August 13, 2021

- Construction of associated facilities between HR1 and the Project site to facilitate the movement of brine and other services.
- Construction of a laydown yard that will also support temporary offices during construction as well as serve as a truck management yard during operations.
- Construction of offices, repair facilities, shipping and receiving facilities, and other infrastructure including the relocation of the IID structures and road improvement at Highway 111.

The Division's primary focus is on active surface mining; however, the Division also addresses issues related to abandoned (pre-1976) legacy mines. The Division has reviewed responsibilities associated with lead agency implementation of the Surface Mining and Reclamation Act of 1975 (SMARA; Public Resources Code [PRC] Section 2710 et seq.). SMARA provides a comprehensive surface mining and reclamation policy to assure that:

- Adverse environmental effects of surface mining operations are prevented or minimized and mined lands are reclaimed to a usable condition which is readily adaptable for alternative land uses.
- Production and conservation of minerals are encouraged, while giving consideration to values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment.
- Residual hazards to the public health and safety are eliminated.

Division staff has reviewed the subject Draft EIR pursuant to CEQA statutes and guidelines and offers the following comments at this time:

- The Division questions where in the Draft EIR consideration is given to SMARA and the primary relationship it establishes between mining and reclamation. Specifically, will a reclamation plan be developed for the Proposed Project? If so:
 - Division staff will provide comments on the Reclamation Plan for this proposed mining activity once the Reclamation Plan and any supporting documents have been received by the Division along with the statement from the County that certifies the submission as complete and in accordance with PRC Section 2772.1(a)(3)(A-C).
 - Division staff will provide comments on the financial assurance cost estimate for the Proposed Project in accordance with PRC Section 2773.4(a-c).

The Division requests to be included on the distribution list for this Proposed Project. Additionally, the Division requests that any subsequent project documents (e.g., the

Mr. David Black
ATLiS - DMR CEQA Comment Letter
August 13, 2021

Final EIR, hearing notices for the Draft and Final EIRs, and any supplemental environmental documents), as well as a copy of the certified Final EIR, be sent to the Division at DMR-Submittals@conservation.ca.gov.

If you have any questions about these comments, please contact me at (916) 323-9198.

Sincerely,

DocuSigned by:
Cameron Campbell
F1336FAAF5AA486...

Cameron Campbell, P.G.
Supervisor

cc: State Clearinghouse, state.clearinghouse@opr.ca.gov
Department of Conservation, Office of Legislative and Regulatory Affairs,
OLRA@conservation.ca.gov
Greg Tenorio, Department of Conservation, Legal Office
State Mining and Geology Board, smgb@conservation.ca.gov
Carol E. Atkins, Division of Mine Reclamation, Environmental Services Unit