



DOLORES HUERTA FOUNDATION

October 23, 2024

Honorable Commissioners
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Dear Chair Cohen, Commissioner Kounalakis, and Commissioner Stephenshaw,

I am writing to express my urgent opposition to the environmentally harmful Cadiz water project and to urge you to ensure Cadiz cannot seek access to State Lands Commission land for its proposed project. Please act to terminate Lease 7527 and approve the reclamation of the site at your December 2024 meeting. Doing this will help stop Cadiz's deceitful, shameless efforts to exploit California's precious resources.

I have been involved in this multi-generational effort to prevent the long-term environmental injustice and disaster that Cadiz proposes. For decades, Federal and State scientists have stated that water in this region is scarce, but Cadiz continues to promise it can supply water to communities. I have long advocated for water solutions that prioritize people, especially disadvantaged communities, and the environment, which is why I strongly oppose Cadiz.

I supported Senator Dianne Feinstein in her efforts to protect the California desert from Cadiz. It is a righteous cause that will benefit generations to come, but only if we continue to do what is right. The California Democratic Party recognized the need to stop Cadiz, including a provision in its 2024 Platform to safeguard the desert water from exploitation. Please take this necessary, meaningful action at your December 2024 meeting.

Sincerely,

Dolores C. Huerta

Dolores Huerta
President



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December 16, 2024

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California State Lands Commission
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Sacramento, CA 95825-8202
CSLC.CommissionMeetings@slc.ca.gov

**Re: SLC Regular Meeting, December 17, 2024, Agenda Item No. 67:
Comments of El Paso Natural Gas Company, LLC**

Dear Commissioners:

I am writing on behalf of my client Kinder Morgan, Inc. (“Kinder Morgan”), the owner of El Paso Natural Gas Company, LLC (“EPNG”), to submit the following comments regarding Agenda Item No. 67: *El Paso Natural Gas Company, LLC (Lessee); El Paso Natural Gas Company, LLC and Cadiz Real Estate, LLC (Applicant)*.¹

EPNG agrees with the Commission Staff’s ultimate recommendation to terminate Lease No. 7527 and simultaneously replace it by approving a three-year “caretaker” lease, under which EPNG and Cadiz Real Estate, LLC (“Cadiz”) would be co-lessees.

Certain elements of the Staff Report merit clarification. First, the Staff Report states that the proposed action is motivated primarily to correct an error in the authorized use under Lease No. 7527, and it characterizes the termination and replacement solution as the result of a voluntary process. (Staff Report at p. 4). While EPNG submitted the application to terminate the lease voluntarily, EPNG has objected to being named as a co-lessee under the replacement lease, since EPNG has no ownership interest in the idle pipeline assets that it authorizes. Without waiver of its objections, EPNG acknowledges the rationale for the Commission Staff’s recommendation for EPNG and Cadiz to serve as co-lessees for the replacement caretaker lease.

Second, the Staff Report states that the replacement lease “requires EPNG and Cadiz to submit *independent applications*” (emphasis added) by December 15, 2025, for decommissioning and removal of authorized improvements. (Staff Report at p. 5). Special Provision 2.5 requires the submission of *one* application for decommissioning and removal, which may be fully satisfied by either EPNG or Cadiz.

¹ Because the Staff Report for Agenda Item No. 67 was not made publicly available until Friday, December 13, we were unable to provide these comments three business days in advance of the SLC meeting scheduled for Tuesday, December 17. We appreciate the Commission’s acceptance and consideration of these comments as part of the record for this matter.

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Finally, the Staff Report mentions in its discussion of “other pertinent information” the interests of Mojave Pipeline Company, LLC. The Mojave Pipeline is an existing natural gas pipeline that runs parallel to but has no physical or operational tie-in to the idle Northern Pipeline. The two pipelines currently have, and have always had, independent utility. EPNG disagrees with the Commission Staff that any interests of Mojave are pertinent to the instant action.

Notwithstanding these comments concerning the contents of the Staff Report, we reiterate our support for the Commission Staff’s bottom-line recommendation that the Commission should terminate Lease No. 7527 and replace it with the proposed short-term caretaker lease. We look forward to participating in the Commission’s hearing of Agenda Item 67 during the regularly scheduled meeting on December 17.

Sincerely,



Laura G. Zagar
Counsel for Kinder Morgan, Inc.

cc: Jennifer Lucchesi, Executive Officer, California State Lands Commission (Jennifer.Lucchesi@slc.ca.gov)
Seth Blackmon, California State Lands Commission (Seth.Blackmon@slc.ca.gov)
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