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Comment Received From: Richard Rollins
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**DRAFT EIR Scoping Comments for the Soda Mountain Solar
Project 2025-09-02**

Additional submitted attachment is included below.

September 2, 2025

Lisa Worrall, Project Manager
California Energy Commission
Siting, Transmission, and Environmental Protection Division
715 P Street
Sacramento, CA 95814

Submitted via CEC's e-commenting system at
<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=24-OPT-03>.

Re: DRAFT EIR Scoping Comments for the Soda Mountain Solar Project. 2025-09-02

Dear Ms. Worrall:

Thank you for the opportunity to provide scoping comments in response to the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Soda Mountain Solar Project.

Well-sited, appropriately designed and managed renewable energy projects are important to everyone in California as we advance California's goals for clean energy and protecting 30% of our lands and waters by 2030 (30x30). With proper siting and design to avoid, minimize or mitigate impacts to biological resources, air quality, public health, and the environment, California can successfully build out the renewable energy system we need to help avert the existential crisis of climate change. Siting renewable energy facilities on structures, or on lands which have already been converted from their natural state and remain impacted, disturbed, or degraded by human activities should be the State's priority.

I am an engineer and have been following the CEC Opt-In projects as well as California's 30x30 progress. I want to compliment the CEC's Opt-in work on the Darden Clean Energy Project. The Darden project is a 1,150 megawatt solar photovoltaic facility and 4,600 megawatt-hour battery storage facility located on 9,500 acres of salt-affected agricultural lands in Fresno County. As approved by the CEC, the Darden project will spare undeveloped land and valuable habitat from development.

I was pleased to learn during the August 29 Soda Mountain Scoping Meeting that the CEC had already identified concerns related to biological resources, geology, water, worker safety and fire protection. I trust the CEC will evaluate the Soda Mountain project with the same attention to detail and careful evaluation of benefits and impacts as was done for the Darden project.

The Soda Mountain project, in a slightly different form, was rejected by San Bernardino County in 2016. The problems that were evident in 2016 are still present; I request in particular that you carefully attend to the issues summarized below.

Biological Resources - Bighorn sheep

- a. Desert Bighorn sheep are vulnerable to further disruption of their habitat connectivity. The Western Association of Fish and Wildlife Agencies (WAFWA) issued a 2023 update* for Desert Bighorn Sheep in California noting that “California’s population was estimated at 5,000 desert bighorn sheep, though expert opinion suggests a decrease of ~10% (500 bighorn, such that 4,500 remain) over the past three years.”

* (<https://www.wildsheepfoundation.org/conservation/wafwa-california>)

The WAFWA California update also emphasizes the critical importance of bighorn movement corridors: “Historically, California’s desert bighorn sheep formed one large metapopulation. Three freeways (I-15, 40, and 10) have divided this metapopulation into six fragments as clearly shown by both genetic and movement data. Re-establishing genetic connectivity remains one of the top priorities for California’s desert bighorn sheep program. Construction is planned to start this year on three wildlife overcrossings traversing I-15 and a planned high speed rail line, designed specifically to benefit the species.”

One of the long awaited and much studied wildlife overcrossings across I-15 and the Brightline West highspeed rail system will be located a short distance to the northeast of the Soda Mountain Solar Project site (1 to 1.5 miles). This wildlife crossing is intended to provide improved connectivity of bighorn sheep between those south of I-15 and those located north of the highway.

Comment: The potential for disrupted wildlife movement corridors must be assessed both for the existing project and for associated cumulative impacts from this project and others. This should include the potential negative impacts that the project will create for access to and successful use of the I-15 wildlife overcrossing by bighorn sheep. Accordingly, fencelines, buffer zones, and placement of other project infrastructure must be assessed for impact during all seasons of the year and with specific focus on impacts to bighorn sheep access to and use of the wildlife overpass.

- b. The applicant’s proposed protective buffer areas are insufficient compared to those recommended by Dudek** and did not consider smaller or alternate project footprints and locations.

** Dudek (2024). Desert Bighorn Sheep Study - Soda Mountain Solar Project. Prepared for the California Department of Fish and Wildlife, Inland Deserts Region

Comment: The potential to reduce impacts to bighorn sheep by considering a reduced or altered project footprint or location must be included in CEC’s evaluation. While the applicant understandably wants to produce and transmit electricity at a competitive cost, the CEC should carefully consider the impacts and risks of the Soda Mountain project when compared to other project locations. Such locations where impacts and risks to protected species are avoided or minimized could include retired agricultural lands, abandoned mine sites, sites included in the Valley Clean Energy Plan in the San Joaquin Valley, which are on previously disturbed and salt-affected agricultural lands, or on other BLM lands that have been previously disturbed. If

alternate project footprints or locations are not considered feasible, the CEC should select a “No Project” alternative for this proposed project.

Biological Resources - Desert Tortoise and Western Burrowing Owl

- a. SWCA Environmental Consultants, on behalf of the project applicant and as part of an “Incidental Take” application in compliance with California Fish and Game Code (CFGF) requirements, proposed a “compensatory mitigation at a proposed ratio of 1:1, or other CDFW-determined ratio, for impacts to approximately 2,670.4 acres.” Neither the agreed upon ratio of impacted habitat to permanently protected land nor the specific site has been disclosed.

Comment: The CEC should consult with the CDFW and review the past success of similar mitigation measures to determine if a 1:1 ratio is sufficient for expected losses of tortoise and owl habitat. Also, any lands proposed for acquisition or compensatory protection should be confirmed by the CEC and CDFW as proven recipient sites for translocating these species, and where existing ecosystems and resident species will not be harmed.

Water Supply and Demand

- a. The project may include up to five new on-site supply wells to extract groundwater from the Soda Mountain Subbasin of the Soda Lake Valley Groundwater Basin for use by the project. As an alternative, or in addition to the five new on-site wells, water may be obtained from an existing well located approximately 3 miles north of Baker within the Silver Lake Valley Groundwater Basin.

The applicant has estimated groundwater demands totaling 862 AF (670 AF with implementation of MM BIO-3) over the life of the project. The applicant's conclusions as stated in TN265183 are as follows: “Given the current understanding of the hydrogeology, as well as the current understanding of the one existing well in the Soda Mountain Subbasin that may be affected by project-induced drawdown, it is unlikely that groundwater pumping for the project would cause any nearby wells to go dry or be severely impaired or rendered unusable by declining groundwater levels.”

Comment: The applicant's analysis and conclusions do not appear to have identified or analyzed potential impact to surface springs, seeps or water sources important for wildlife or habitat within the Soda Mountain Subbasin or other parts of the Soda Lake and Silver Lake Valley Groundwater Basins. This may be a critical omission leading to a conclusion that ignores potentially significant negative impacts to resident or transient wildlife. I urge the CEC to require that the applicant's water supply study be amended to identify and assess impact to surface water sources and to the wildlife and habitat dependent on such sources of water.

Thank you for considering these comments. I look forward to reviewing and commenting on the Project DEIR when it is available.

Sincerely,
Richard Rollins, P.E.