

DOCKETED

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Submitted to the Docket: 24-OPT-03 Soda Mountains Solar

September 3, 2025

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

RE: Scoping comments on Docket: 24-OPT-03 Soda Mountains Solar

The development of renewable energy is a critical component of efforts to reduce greenhouse gas emissions, avoid the worst consequences of global warming, and to assist California in meeting its ambitious emission reductions goals. The Center for Biological Diversity (the “Center”) strongly support the development of renewable energy production, and the generation of electricity from solar power, in particular. However, like any project, proposed solar power projects should be thoughtfully planned to minimize impacts to the environment. In particular, renewable energy projects should avoid impacts to sensitive species and habitats and should be sited in proximity to the areas of electricity end-use in order to reduce the need for extensive new transmission corridors and the efficiency loss associated with extended energy transmission. Only by maintaining the highest environmental standards regarding local impacts, and effects on species and habitat, can renewable energy production be truly sustainable.

The Center for Biological Diversity (Center) submits these comments on the Soda Mountain Solar Project (Docket: 24-OPT-03) on behalf of our members, staff, and supporters. The Center for Biological Diversity (“Center”) is a non-profit environmental organization with more than 1,7 million members and supporters, including many members who live and recreate in California including the Mojave desert where this project is proposed. The Center uses science, policy, and law to advocate for the conservation and recovery of species on the brink of extinction and the habitats they need to survive. The Center has and continues to actively advocate for increased protections for species and habitats in the California deserts on lands managed by the BLM within the California Desert Conservation Area including the threatened state endangered and federally threatened desert tortoise, the state fully-protected and federally endangered Mohave tui chub, state protected desert bighorn sheep, state candidate species burrowing owls as well as other species which will be affected by the proposed project.

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Background

The Center along with other conservation organizations was engaged in the former proposed Soda Mountains Solar project throughout the prior CEQA and NEPA processes. The Bureau of Land Management (BLM) approved the former project in 2016. The former lead CEQA agency – the County of San Bernardino – rejected the project due to concerns about its significant environmental impacts.

Current Status

This CEC process will re-visit the CEQA process and we provide issues that must be fully addressed in the Staff Assessments. In April of 2025, the BLM started a new NEPA process in a Soda Mountain Solar Project Amendment based on “substantial changes to a filed application by Soda Mountain Solar, LLC, the Bureau of Land Management will be analyzing the proposed impacts to the human environment in compliance with the National Environmental Protection Act.”¹ The CEC Staff Assessments must closely coordinate with the BLM’s NEPA review for consistency between the NEPA and CEQA documents where appropriate including compliance with the Desert Renewable Energy Conservation Plan requirements.

Issues to be Addressed in the Staff Assessments

Despite the adjacency to the Interstate 15 highway, the area remains a remote part of the Mojave Desert. The project is also near the boundary of the National Park Service’s Mojave National Preserve, a vast and ecologically complex landscape that stands to be negatively affected by industrial development on its borders. Numerous sensitive species occur in the general area including but not limited to the following:

Mojave Desert Tortoise

While the Mojave desert tortoise is federally listed as threatened under the Endangered Species Act, the State of California recently recognized that the status of the Mojave desert tortoise has continued to decline to the point where uplisting the species under CESA from threatened to endangered was warranted and subsequently uplisted to endangered. The proposed project is still located in desert tortoise habitat next to a desert tortoise conservation area (the Mojave National Preserve). The Staff Assessments must closely analyze the impact to desert tortoise from the proposed project including opportunities for important connectivity enabled by future wildlife crossings over and/or under the Interstate 15.

¹ <https://eplanning.blm.gov/eplanning-ui/project/2034061/510>

Desert Bighorn Sheep

The California Department of Fish and Wildlife has been integral in working with CalTrans and Brightline West to provide connectivity for desert bighorn sheep, a fully protected species under CESA) over the I-15 and high-speed rail project that runs primarily in the I-15 median. One of the proposed wildlife bridges connects the Soda Mountains to the Mojave National Preserve, providing critical connectivity for the sheep in the general area of the proposed project. Maintaining desert bighorn movements on a landscape scale provides for gene flow among extant populations and colonization of vacant habitat patches, both of which are considered essential to long-term conservation and management of this species.

Development of the proposed project area would heavily impact the important planned connectivity for the sheep and eliminate a critical conservation opportunity. The Soda Mountains, including the proposed solar project site and adjacent hills, are the most likely habitat linkage connecting extant desert bighorn herds in the Avawatz, South Soda, Old Dad, North Bristol, and Cady Mountains. Desert bighorn populations in portions of the central Mojave region have undergone significant changes in distribution, including a dramatic population increase in the Cady Mountains, and the natural colonization of the South Soda Mountains.

Therefore the Staff Assessments must address the potential impacts of the proposed project on desert bighorn sheep and the planned connectivity bridge that would re-establish the connectivity between the populations through the central Mojave regions.

Burrowing Owl

Recently elevated to a Candidate species status under CESA, the burrowing owl has become increasingly rare in California. While never common in the central Mojave Desert, the proposed project site includes habitat for burrowing owls. Therefore the Staff Assessments must address the potential impacts of the proposed project on burrowing owls in the context of its candidacy.

Mohave Tui Chub

In this arid area, the amount of water used by the proposed project will likely be significant and the Staff Assessment must closely analyze the hydrological impacts from the wells. Surface water resources on other public lands must not be affected by the drawdown of the water table over the life of the project, especially Zzyzx Spring and other locations in the Mojave National Preserve. We are particularly concerned about the impact to Zzyzx and Lake Tuenidae regarding the critically endangered Mojave Tui Chub. These water features are strongholds for this endemic species and any decrease in water from this proposed project may indeed affect the water resources and in-turn the Mohave Tui chub. A water monitoring plan must be included and monitor not only of water levels in Zzyzx Springs and Lake Tuenidae, but also water quality prior to wells being drilled and then throughout well pumping for the life of the project, with enforceable safeguards to trigger cessation of pumping if the springs/seeps are affected by water pumping.

In all, this proposed project is located in the wrong place and has numerous hurdles to overcome prior to moving forward. This CEC process must carefully evaluate the full range of impacts, provide reasonable protective alternatives, and avoid impacts first, minimize impacts secondly and only after implementing those CEQA requirements, mitigate any residual impacts.

Please feel free to reach out with any questions or concerns. Please keep the Center on the list of interested public as the CEC process proceeds.

Sincerely,



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