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*Comment Received From: Morongo Basin Conservation Association
Submitted On: 9/4/2025
Docket Number: 24-OPT-03*

Morongo Basin Conservation Association comments on Soda Mountain

RE: 24-OPT-03 Dear Reader, MBCA submitted our comment letter BEFORE the filing deadline of 5:00 pm 9-3-25. However due to email difficulties from our remote location the document was not delivered until 9-4-25. Please include our letter within the official record. Thank you for your consideration!

Additional submitted attachment is included below.



morongo basin conservation association

Post Office Box 24, Joshua Tree CA 92252

mbconservation.org

September 3, 2025

California Energy Commission (CEC)

RE: Soda Mountain Solar Project NOP Comments

24-OPT-03

Email: docket@energy.ca.gov

The Morongo Basin Conservation Association (MBCA) is a 501(c) 3, community-based all volunteer California Non-Profit Corporation. The Directors and members of the MBCA have been educating Morongo Basin residents about issues affecting our environmental and economic health since our incorporation in 1969. Since the placement of industrial solar facilities on vast acreages of the California Desert's public lands affect both the natural environment and the economic well-being of all our desert communities we have broadened our area of concern beyond the Morongo Basin.

Thank you for this opportunity to comment on the Soda Mountain Solar Project (SMSP) NOP.

The project applicant, Soda Mountain Solar, LLC, submitted a revised application on Aug. 1, 2024, to the CEC's Opt-In Certification program to construct and operate a combined 300 MW of solar photovoltaic (PV) with 1200 MWH of battery energy storage on 2,760 acres of BLM administered land in the California Desert District, within the Barstow Field Office jurisdiction. It would include associated infrastructure, such as operation and maintenance buildings, stormwater controls, substation and switchyard for interconnection to the Marketplace-Adelanto 500-kilovolt transmission line, and battery storage facilities across an 18-acre pad.

A previous Environmental Impact Review under CEQA was undertaken but never certified by San Bernardino County.

Thank you, CEC, for sending out organizational and individual comments as they were submitted. For the sake of brevity MBCA incorporates the comments of Defenders of Wildlife (TN#265827) and Basin and Range Watch (TN#265841 into these written comments.

Is this 4th attempt to develop Soda Mountain Solar with battery backup necessary to meet California's energy needs by 2045?

According to staff writer Melody Peterson in her Los Angeles Times article on November 24, 2024, our answer is NO.¹

In the last 12 months, California curtailed production of 3 million megawatt hours of solar energy, enough to power 518,000 homes for a year. Californians, whose electric rates are roughly twice the national average, are essentially paying for power capacity they are unable to use. The solar glut raises questions about the state's plan to generate all its electricity from carbon-free sources by 2045.

The waste would have been even larger if California had not paid utilities in other states to take the excess solar energy...That means green energy paid for by California electricity customers is sent away, lowering bills for residents of other states...Arizona's largest public utility reaped \$69 million in savings last year (2024) by buying from the market California created to get rid of its excess solar power. The utility returned that money to its customers as credit on their bills.

It gets worse...

Also reaping profits are electricity traders, including banks and hedge funds. The increasing oversupply of solar power has created a situation where energy traders can buy the excess at prices so low they become negative, said energy consultant Gary Ackerman, the former executive director of the Western Power Trading Forum. That means the solar plant is paying the traders to take it. "This is all being underwritten by California ratepayers," Ackerman said.

The CEC is positioned to investigate updates to this 2024 analysis and, as the permitting power for renewable energy projects, legally and ethically required to report their findings for all to learn.

¹ <https://www.latimes.com/environment/story/2024-11-24/california-has-so-much-solar-power-that-increasingly-it-goes-to-waste>

The Desert Underground



Panorama looking north from the lower Soda Mountains across the proposed solar project site. Photo from Basin and Range Watch ²

As proposed, the Soda Mountain Solar Project would be constructed on 2,760 acres of undeveloped desert land. The incorporated comments by Defenders of Wildlife and Basin and Range Watch accurately describe the devastation the SMSP would cause to this rich and functioning system. The EIR must accurately investigate and describe this loss. BUT the EIR must ALSO account for the release of the underground sequestered carbon into the atmosphere and the loss of function for capturing and storing atmospheric carbon into the future. Inland deserts account for 10% of the state's total stored carbon.³

An excellent description of the carbon sequestration and storage process along with 29 references, including the **CEC -500-2014-063 Carbon Balance in California Deserts: Impacts of Widespread Solar Power Generation** by Dr. Michael Allen, was published in the March 2019 Desert Report.⁴

The California Energy Commission and the California Natural Resources Agency are both focused on mitigating the effects of our warming climate. With the precipitous decline in Wildlife the value of protecting biodiversity must be given strong representation within any analysis of the environmental effects of this project.

² <https://www.basinandrangewatch2.org/solar-projects/soda-mountain-solar-project>

³ <https://defenders-cci.org/publication/climate-mitigation-in-california/>

⁴ <http://www.desertreport.org/?p=2270>

MBCA has participated in the preparation of a report highlighting the role of the California Deserts in the States's 30x30 effort:

The California Desert's Role in 30X30: Carbon Sequestration and Biodiversity

The issues presented within this report warrant consideration within the EIR for this project.

As seen in the discussions above, the CEC, as the planning authority for solar energy projects is not a neutral bystander. The CEC is in a position to update and publish the usage of solar energy produced in California by California rate payers and to require that the Environmental Impact Assessment of Climate Change/Greenhouse Gas Emissions include the release of stored carbon into the atmosphere and the loss of the soil system's function to continue capturing and storing carbon for millennia.

Sincerely,

A handwritten signature in black ink that reads "Steve Bardwell". The signature is written in a cursive, flowing style with a long horizontal line extending from the end.

Steve Bardwell,
President, MBCA