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*Comment Received From: Mark Carrington  
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## **Please Select a No Project Alternative â€“ Soda Mountain Solar Project**

Please Select a No Project Alternative â€“ Soda Mountain Solar Project

To the California Energy Commission,

I respectfully urge the Commission to select the No Project Alternative for the Soda Mountain Solar Project.

This proposal would industrialize 2,670 acres of intact desert landscape directly adjacent to the Mojave National Preserve. The Commissionâ€™s own analysis acknowledges significant and unavoidable impacts, particularly to desert bighorn sheep and visual resources. Issuing a Statement of Overriding Considerations in the face of such impacts undermines public confidence in the review process and the intent of environmental protections.

The project site lies within a critical movement corridor for desert bighorn sheep associated with the Cady Mountains herd. Eight-foot security fencing surrounding the facility would block wildlife movement entirely, fragmenting habitat at a time when the State is investing millions of dollars in wildlife crossings to maintain connectivity across Interstate 15. Approving this project would directly contradict those conservation investments.

Federally threatened Mojave desert tortoise habitat would be further fragmented. Mojave fringe-toed lizard populations, already impacted elsewhere by large-scale solar development, would lose additional habitat and experience cumulative impacts to sand transport systems essential to their survival. Kit foxes, American badgers, burrowing owls, and rare plant communities would lose 4 square miles of functioning desert ecosystem.

The project proposes extraction of groundwater from up to five new onsite wells within the Soda Lake Valley Basin. In an arid region where springs and hydrologic systems are interconnected, even â€œless than significantâ€ determinations deserve precaution. Groundwater ultimately supports sensitive desert ecosystems, including springs near Zzyzx and habitat for the federally endangered Mojave tui-chub. Water for construction should be trucked in rather than drawn from fragile desert aquifers.

The 300 MW battery storage component introduces additional risk. Lithium battery thermal runaway events have demonstrated the capacity to burn for extended periods, release toxic smoke, and disrupt transportation corridors. Emergency response capabilities in remote desert communities remain limited.

Visual impacts have been determined significant and unavoidable. Industrial-scale solar arrays adjacent to a national preserve contradict the landscape protection goals of the Desert Renewable Energy Conservation Plan. The project site was not designated as a Development Focus Area under that plan.

The presence of the congressionally designated Old Spanish National Historic Trail within proximity of the project area further warrants caution. Analysis should be paused until a Comprehensive Management Plan for the Trail is completed, including consideration of appropriate protective buffers.

Renewable energy development is necessary “ but it must be responsibly sited. As San Bernardino County previously recognized, disturbed lands near transmission corridors are more appropriate than intact desert landscapes adjacent to national preserves.

For these reasons, I respectfully request that the Commission select the No Project Alternative for the Soda Mountain Solar Project.

Thank you for your consideration.

Mark Carrington  
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