

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-OPT-03
<b>Project Title:</b>	Soda Mountain Solar
<b>TN #:</b>	268829
<b>Document Title:</b>	No Alternative for the Soda Mountain Solar Project
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Eric Smith
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/26/2026 1:41:26 PM
<b>Docketed Date:</b>	2/26/2026

*Comment Received From: Eric Smith*  
*Submitted On: 2/26/2026*  
*Docket Number: 24-OPT-03*

## **No Alternative for the Soda Mountain Solar Project**

I am writing regarding the Soda Mountain Solar Project.

The California Energy Commission (CEC) has concluded that this project will have significant and unavoidable impacts to desert bighorn sheep. The project is adjacent to an essential bighorn herd in the Cady Mountains that uses the south Soda Mountains extensively. A movement corridor would be partly blocked by the solar project, which needs 8-foot-tall chain-link security fences surrounding the project and which excludes large wildlife, completely blocking any movement by bighorn. Caltrans is currently building a wildlife crossing over Interstate 15 to maintain linkage for desert bighorn sheep, but the Soda Mountain project would block it.

The CEC has concluded that the project will have significant and unavoidable impacts to visual resources. The project would be adjacent to the Mojave National Preserve and violated the visual standards implemented by the Desert Renewable Energy Conservation Plan.

In addition:

- The project will block connectivity for the federally threatened and California State Endangered Mojave Desert Tortoise.
- Sand transport would be blocked and habitat would be removed for Mojave fringe-toed lizard.
- Habitat would be removed for rare plants, kit foxes, American badgers and burrowing owls.
- The project would extract water from 5 onsite wells adding to a cumulative groundwater decline for the springs at Zzyzx and for the federally endangered Mojave tui-chub. An alternative using offsite wells was not selected.
- Lithium battery banks or BESS storage could cause a thermal runaway fire which would emit toxic smoke and chemicals to the local environment and endanger motorists on Interstate 15. An alternative eliminating lithium battery storage was not considered.

The analysis of this project should be paused until a Comprehensive Management Plan can be established for the Old Spanish National Historic Trail.

The location of the Soda Mountain Solar Project was not designated for solar energy development under the Desert Renewable Energy Conservation Plan, and the Soda

Mountain area is not a Development Focus Area.

For these reasons, CEC must select a No Project Alternative!