

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-OPT-03
<b>Project Title:</b>	Soda Mountain Solar
<b>TN #:</b>	268838
<b>Document Title:</b>	Morongo Basin Conservation Association (MBCA) Comments - Comment letter - Morongo Basin Conservation Association
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Morongo Basin Conservation Association (MBCA)
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/26/2026 9:54:05 PM
<b>Docketed Date:</b>	2/27/2026

*Comment Received From: Morongo Basin Conservation Association (MBCA)  
Submitted On: 2/26/2026  
Docket Number: 24-OPT-03*

**Comment letter - Morongo Basin Conservation Association**

*Additional submitted attachment is included below.*

# MBCA



## morongo basin conservation association

Post Office Box 24  
Joshua Tree CA 92252  
[www.mbconservation.org](http://www.mbconservation.org)

February 26, 2026

California Energy Commission  
715 P Street  
Sacramento, California 95814

Subject: Docket Unit, MS-4  
Docket No. 24-OPT-03

Email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

Dear Readers,

The Morongo Basin Conservation Association (MBCA) appreciates this opportunity to address various issues associated with the Soda Mountain Solar Project.

We believe that this project should not be approved (more correctly that the “No-Action” alternative should be chosen), as the project is poorly sited and detrimental to the maintenance of desert vistas and healthy communities. These qualities are what attract people to the desert, both as residents and as visitors, and are the economic drivers of our communities and way of life.

1. Wildlife Crossing:

The agreement that allowed the Brightline West high-speed rail line was contingent on construction of wildlife overpasses allowing animals to safely cross both the rail track and the I-15 freeway. Consultations between environmental organizations, wildlife biologists, California Department of Fish and Wildlife (CDFW) and California Department of Transportation (CalTrans) resulted in three locations being chosen for the overpasses. (These were based primarily on bighorn sheep migration patterns.) One of these overpasses is to be constructed at Soda Mountain. Bighorn sheep are notoriously shy of human activities, so construction of a solar field at this location will be contrary to the very qualities the overpass is attempting to mitigate.

2. Wildlife

a. Bighorn Sheep

- Bighorn sheep populations in the California deserts are fragmented, primarily by highways that the sheep are unwilling to cross. This leads to genetic isolation of populations, with inbreeding causing loss of viability and the gradual weakening and extirpation of the isolated population(s). Interstate 15

splits populations in the Death Valley region from those in the Mojave Preserve, to the detriment of both. The Soda Mountain wildlife crossing is designed to alleviate this issue, but construction of a solar project will interfere with this effort. (Wildlife crossings are also planned in other parts of the California Desert.)

b. Desert Tortoise

- There is a small population of desert tortoises within the project site. Previous efforts to relocate tortoises have had poor reproductive success. We would like to see what detailed plans the project and the State have for this population, as well as determinations of likelihood of long-term success with the transplanted population.

c. American Badger

d. Burrowing Owl

e. Mojave Fringe-toed Lizard

- These species were also observed on the project site, and we would like to see detailed analyses of relocation plans and expected success rates.

f. The area has not been adequately surveyed for rare plant species (or for any plants, for that matter).

- Given high rates of endemism in the desert, it is likely that new species (by definition rare) will be discovered during any systematic survey of the area.
- Plant surveys of the project site should be conducted by plant taxonomists over at least a full year to account for seasonal variations of annual species.

3. Dust

This concern is the subject of a comprehensive letter submitted by Pat Flanagan, a board director of MBCA. The comments within that letter are adopted within this letter.

In short, disturbances to desert soils will almost always result in the long-term production of dust. With certain types of soils (see Pat's letter) the problem is exacerbated. Frequent and high winds (as at the Soda Mountain site) amplify it even more. Decision makers should examine the situation at Aratina Solar near Boron, or at the smaller solar projects in Lucerne Valley for examples of the potential impacts of blowing dust. Soda Mountain is close (and often upwind) of the town of Baker, and perhaps most significantly, is adjacent to the busy Interstate 15 freeway that is the main link between Los Angeles and Las Vegas. During a high wind event (very common in these parts) the dust could be as much a visual impediment as a tule fog in the Central Valley.

- Please examine dust videos from Aratina and other desert solar sites. (A link to one such video is [HERE](#)). We would be glad to provide additional videos.

In the Barstow public meeting, the project applicant remarked that they had managed to reduce grading impacts from 1500 acres to just 75 acres. This sounds impressive on a project site of over 2500 acres. In fact, it sounds a little too good. We suspect the applicant may be counting disturbance only for the bases of the solar panels and other related equipment, and we would expect clarification on that point before any project is approved. It seems apparent that most of the site will be scraped, at least to the point of removing existing vegetation. In addition, the solar panel locations must be connected by vehicle access roads as well as by electrical connections. Anywhere vegetation is removed in the desert must be considered as “disturbance” from the perspective of dust generation. Any stratification of surface soil is compromised, and any fungal mycelial networks that hold surface particles together are destroyed. The question then becomes: How are you going to mitigate the dust problem you have just created?

#### 4. Water

A traditional way to control dust is by spreading water over it. Given abundant sunlight, low humidity, and wind, the water must be applied in large amounts and often. (Aratina reportedly applies water multiple times per day, and the dust still blows.)

- This project was denied water by San Bernardino County.
- The applicant is currently getting water by truck from an offsite private well.
  1. Will this amount be adequate for construction, as well as for daily maintenance/dust control during operation?
  2. Has the impact of projected water withdrawal on the local aquifer (from the private well) been assessed?
  3. The expenditure of carbon and Green House Gas emissions due to trucking the water must be considered within the environmental analysis.

#### 5. Opposition from government entities

- a. San Bernardino County Board of Supervisors voted against approving a solar plant on this site. (No water available)
- b. The US National Park Service has expressed opposition. (Adjacent to Mojave National Preserve)
- c. The project is contrary to plans by CalTrans and CDFW. (The wildlife crossing, as discussed above.)

In short, a solar project is a monumentally bad choice for this site. Either the wildlife crossing or the dust issue, by itself, is adequate reason to select the “No-Action” alternative for this project, and we urge you to do so.

Thank you for the opportunity to comment.

Arch McCulloch, Director  
Morongo Basin Conservation Association