

**Amargosa Conservancy * California Wilderness Coalition * Desert Tortoise Council *
The Wildlands Conservancy * Mojave Desert Land Trust * Morongo Basin Conservation Association *
San Bernardino Valley Audubon Society * Archaeological Heritage Association * Tourism Economics
Commission * Newberry Springs Community Services District * Baker Community Services District *
Death Valley Chamber of Commerce * Mojave National Preserve Conservancy * Alliance for Desert
Preservation * Mojave Communities Conservation Collaborative**

October 7, 2014

Jim Kenna, Director
California State BLM
2800 Cottage Way, Suite W-1623
Sacramento, CA 95825

RE: Soda Mountain Solar and Silurian Valley Solar Project

Dear Mr. Kenna:

The undersigned organizations respectfully request that the BLM reject the variance application for Silurian Valley Solar and urge you to relocate the Soda Mountain Solar Project to an area that does not jeopardize natural, cultural, archaeological or community resources on the grounds that these projects violate:

- The goals and recommendations of the formal independent scientific panel to the Desert Renewable Energy Conservation Plan (DRECP)
- The intent of the Solar Programmatic Environmental Impact Statement (Solar PEIS)
- The Secretary of the Interior's order 3330 and the public's substantial investment in trust resources.

Independent Science Panel and Secretarial Order 3330

The recommendations from the DRECP's formal panel of Independent Science Advisors states that, "Habitat fragmentation and impediments to wildlife movements are among the greatest threats to desert communities and species and maximizing habitat connectivity is essential to climate change adaptation." The Panel also states that, "The plan should embrace the primary goal of avoiding and minimizing any additional habitat loss or fragmentation" and that agencies should, "Avoid any developments within critical habitats for federal and state listed; threatened and endangered species; candidate species for federal or state listing; sensitive habitats, core areas and important linkages, migration corridors or habitat connectivity areas." (DRECP Independent Science Advisors, p. 6,7,75). Finally, both the Silurian and Soda Mountain projects undermine the Secretary of the Interior's Order 3330, which states that, "The Department of the Interior seeks to avoid potential environmental impacts from projects through steps such as advanced landscape level planning that identifies areas suitable for

development because of low or relatively low natural and cultural resource conflicts” (Department of Interior, 2013).

Silurian Valley Solar Project

The Silurian Valley Solar Project constitutes a threat to trust resources such as migrating and special status birds, golden eagles and the federally threatened desert tortoise (USFWS, 2014, p.1). The proposed project would be located in an area that has several active golden eagle nests within a ten mile radius; proximity to the Salt Creek Hills Area of Critical Environmental Concern (ACEC), Death Valley National Park’s Saratoga Springs and the Amargosa River that provide resting and refueling stops for migrating and special status birds; is habitat and a major linkage for desert tortoise and overlaps with a proposed ACEC identified in the current draft preferred alternative for the DRECP (USFWS, 2014, p2). Both the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) recommend that the Bureau of Land Management reject the variance application for this project with the USFWS stating that, “We cannot envision how a redesigned project or a project at a different location within the Silurian Valley could avoid the sorts of impacts to trust resources described above.”(CDFW, 2014, p.3)(USFWS, 2014, p.4). The CDFW correctly states that the applicant will likely not be able to document that the project is within an area with, “low or comparatively low resource conflicts, that the proposed project will be located in an area identified as suitable for solar energy development in an applicable BLM land use plan and/or by another related process such as DRECP, that the proposed project will minimize adverse impacts on important fish and wildlife habitats and migration corridors and that the proposed project will minimize impacts on lands with wilderness characteristics and the values associated with these lands(CDFW, p.3). The aforementioned criteria are outlined for variance applications in section B.5.3 of the BLM’s Solar PEIS (CDFW, p.3). The development of these two projects, which are very much in conflict with the BLM’s own criteria, would erode public trust in implementation of the further implementation of the Solar PEIS and future implementation of the DRECP

Soda Mountain Solar Project

The proposed Soda Mountain Solar Project, among other significant impacts, would jeopardize landscape level conservation in the Mojave Desert by precluding the reestablishment of a critical bighorn sheep movement corridor. The report *Potential Impacts of Proposed Solar Energy Development near the South Soda Mountains on Desert Bighorn Sheep Connectivity’s* network analysis demonstrated that, “the North-South Soda Mountain Connection is the most important restorable corridor for long term demographic potential across the entire southeastern Mojave Desert of California as it would provide the best and only opportunity for movement of bighorn populations in the Mojave National Preserve and the large complex of populations to the north of Interstate 15, and would facilitate gene flow as well as resulting in long term connections with bighorn sheep populations in Death Valley National Park” (Epps et al, 2013, p.1). Moreover, the Soda Mountain Solar draft EIR/EIS examination of alternative locations for the project on private lands, EPA brownfields and highly disturbed BLM lands, as well as the potential to reach renewable energy goals by distributed means, was woefully inadequate and should be remedied by the BLM and project proponent reexamining these topics and expanding the scope of the alternative lands search.

In closing, the undersigned organizations respectfully request that the BLM reject the variance application for Silurian Valley Solar and relocate the Soda Mountain Solar Project to an area that does not jeopardize natural and cultural resources, archaeological sites and communities because they

undermine the goals and recommendations outlined in the DRECP, Solar PEIS and the Secretary of the Interior's order 3330, while jeopardizing trust resources that are important to all Americans.

Sincerely,

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References

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