

To: Interested Party

From: Coalition of organizations, businesses, and residents opposed to Soda Mountain Solar's proposed location.

Date: March 3, 2015

Contents of recent letters demonstrating opposition to Soda Mountain Solar:

- 1/12/15 Letter to Interior Department from 30 economic development, local business, tourism, hunting and conservation groups working in the California desert.
- 1/22/15 Letter to Interior Department from Mojave Communities Conservation Collaborative (MC3), which has over 200 members and services the California's high desert, including Victorville, Apple Valley and Lucerne Valley.
- 12/12/14 Letter to Interior Department from Wild Sheep Foundation, representing hunters in the Mojave Desert and across the West.
- 1/12/15 Letter to Interior Department from American Lands Access Association, representing diverse recreational users whose visitor experience would be compromised by the project.
- 1/15/15 Letter to Interior Department from the CEOs of national conservation groups (Defenders of Wildlife, National Parks Conservation Association, and Sierra Club).
- 1/20/15 and 2/3/15 Letters to Interior Department from four members of BLM's Desert Advisory Council, who are leaders in their communities of diverse interests such recreational and OHV users and wildlife conservation.

71L Ranch * Society for the Conservation of Bighorn Sheep * Joshua Tree Community Association * Death Valley.com * Town of Nipton * Shoshone Village * Shoshone Museum Association * Sun Runner Magazine * The Real Desert * 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 * Death Valley Chamber of Commerce * Mojave National Preserve Conservancy * Alliance for Desert Preservation * Mojave Communities Conservation Collaborative * Harrison House * Radio Free Joshua Tree * Southern California Desert Video Astronomers * Myth in the Mojave * California Desert Coalition * National Parks Conservation Association * Baker Community Services District

January 12, 2015

The Honorable Sally Jewell
Secretary of the Interior
1849 C Street, N.W.
Washington DC 20240
Sent via email to Tommy Beaudreau

Re: Opposition to Soda Mountain Solar; Request Relocation of Project

Dear Secretary Jewell,

We are writing to you about a policy decision your department will be soon making regarding the Soda Mountain Solar project proposed to be developed within a quarter-mile of Mojave National Preserve. As organizations and businesses that rely on Interior Department lands to sustain our regional economy, public trust resources, and quality of life, we urge you to decide to relocate the project to an appropriate site, carrying out your new landscape-scale conservation approach in the California Desert.

The Mojave National Preserve is a critical anchor in the California Desert, connecting prized national park and Bureau of Land Management landscapes stretching from Joshua Tree to Death Valley. Years of investments in trust resources, public land planning efforts such as the completed Solar Programmatic Environmental Impact Statement (SPEIS) and underway Desert Renewable Energy Conservation Plan (DRECP), and Secretarial Orders have built trust and credibility in the Interior Department's new approach to conservation in the California Desert. These planning efforts never contemplated renewable energy development in the Soda Mountain location given its known conservation value and extremely close proximity to a national park.

Development in the proposed location would be inconsistent with the SEIS, the recommendations from the DRECP's formal panel of Independent Science Advisors, and Secretarial Order 3330. The project proponent has requested your department approve the project at its currently proposed location, but that would significantly undermine the DRECP by rendering unreliable and unpredictable the Department's decision-making on and commitment to landscape-scale conservation. Their request should be rejected so that a suitable location can be identified.

We look to the Department for leadership on this decision and commitment to this unique, national landscape in order to sustain and build needed public support for the DRECP decision-making

process. The facts, law, policy, and science before you strongly support a decision to relocate the project.

Thank you for your continued leadership on national parks and landscape planning. We look forward to the Interior Department's decision on this critically important issue.

Sincerely,

Rob Blair, Owner/Operator
71L Ranch
Mojave National Preserve

Bob Burke, Vice President
Society for the Conservation of Bighorn Sheep
Pasadena, CA

Gerald Freeman, Owner/Proprietor
Town of Nipton
Nipton, CA

Randy Banis, Editor
DeathValley.com
Death Valley, CA

Patrick Donnelly, Executive Director
Amargosa Conservancy
Shoshone, CA

Monica Argandona, Southern California Conservation Director
California Wilderness Coalition
Oakland, CA

Ed L. Larue, Jr., MS., Ecosystems Advisory Committee Chair
Desert Tortoise Council
Palmdale, CA

April Sall, Conservation Director
The Wildlands Conservancy
Oak Glen, CA

Frazier Haney, Conservation Director
Mojave Desert Land Trust
Joshua Tree, CA

Sarah Kennington, President
Morongo Basin Conservation Association
Joshua Tree, CA

**Drew Feldmann, Conservation Committee Chair
San Bernardino Valley Audubon Society
San Bernardino, CA**

**Ruth Musser Lopez, Principal
Archaeological Heritage Association
Tourism Economics Commission
Needles, CA**

**Le Hayes
Newberry Springs Community Services District
Newberry Springs, CA**

**Nancy Good, President
Death Valley Chamber of Commerce
Tecopa, CA**

**Michael Gordon, Director
Mojave National Preserve Conservancy
Barstow, CA**

**Rich Ravana, President
Alliance for Desert Preservation
Apple Valley, CA**

**Lorrie Steely, Lead Organizer
Mojave Communities Conservation Collaborative
Apple Valley, CA**

**Paul Smith
Tourism Economics Commission
Twentynine Palms, CA**

**Victoria Fuller, Chair
Joshua Tree Community Association
Joshua Tree, CA**

**Steve Brown, Publisher and Executive Producer
Sun Runner Magazine and The Real Desert with Steve Brown
Joshua Tree, CA**

**Susan Sorrells, Owner
Shoshone Village
Shoshone, CA**

**Susan Sorrells, President
Shoshone Museum Association
Shoshone, CA**

**Eva Soltes, Founder/Director
Harrison House Music and Arts
Joshua Tree, CA**

**Ted Quinn, Director
Radio Free Joshua Tree
Joshua Tree, CA**

**Tom O'Key, Founder
Southern California Desert Video Astronomers
Joshua Tree, CA**

**Catherine Svehla, PhD., Founder
Myth in the Mojave
Joshua Tree, CA**

**Ruth Rieman, Vice Chair
California Desert Coalition
Yucca Valley, CA**

**Seth Shteir, California Desert Field Representative
National Parks Conservation Association
Joshua Tree, CA**

**Jacob Overson, General Manager
Baker Community Services District
Baker, CA**

January 22, 2015

Tommy Beaudreau, Chief of Staff
Department of Interior
Washington, DC

Dear Mr. Beaudreau:

My name is Lorrie Steely and I am founder of Mojave Communities Conservation Collaborative (MC3) and one of the lead organizers for the recent DRECP meeting in Victorville, California which was attended by almost 500 people. MC3 has over 200 members and our service area is California's high desert, including Victorville, Apple Valley and Lucerne Valley. I am a supporter of developing renewable energy resources to help buffer us from the worst impacts of climate change and help make our nation more energy independent in areas that don't jeopardize our precious natural, cultural and community resources and I am writing you to express my opposition to the Coolwater Lugo transmission project, Lucerne Valley DFA and also the current siting of the Soda Mountain Solar Project. The Soda Mountain Solar Project should be relocated to an area where it does not harm important trust resources like bighorn sheep migration corridors and the scenic viewsheds and water resources of the Mojave National Preserve.

Respectfully,

A handwritten signature in black ink, appearing to read "Lorrie Steely". The signature is written in a cursive, flowing style.

Lorrie Steely, Founder

Mojave Conservation Collaborative
Apple Valley, CA



December 12, 2104

On behalf of our nearly 6,000 members, the Wild Sheep Foundation (WSF) wishes to go on record in opposition to the Soda Mountains Solar Project, as currently proposed. We believe that the proposed project will have long-term, negative effects on connectivity and future persistence of desert bighorn sheep in and around the Soda Mountains metapopulation, encompassing the Avawatz Range, Cady Mountains, Old Dad Mountains, and North Bristol Mountains.

Over 40 years ago, it was recognized that consideration should be given to allow sheep movements between mountain ranges, and that construction of facilities that would further restrict opportunities for movement would be detrimental to the persistence of bighorn sheep. Inarguably, the Soda Mountains Solar Project as proposed will constrain movements of bighorn sheep, and is inconsistent with management and conservation of bighorn sheep in California, as specified in CDFW's desert bighorn sheep management plan.

Results of recent research have emphasized the relevance of the proposed location of the Soda Mountains Solar Project to much-needed connectivity between the northern and southern Soda Mountains, as well as the importance of the Soda Valley as a future movement corridor. Construction of infrastructure or barriers that constrain potential movement by bighorn sheep will dampen the probability of genetic or demographic connectivity between populations of bighorn sheep occupying portions of the North Central Mojave and Central Mojave bighorn metapopulation, threatening long-term persistence.

The Soda Mountains Solar Project, as proposed, is inconsistent with BLM's 1989 Range-Wide plan for managing bighorn sheep habitat on public lands. That 1989 BLM document lists 15 prescriptions for maintaining habitat for bighorn sheep on public lands; the proposed Soda Mountains Solar Project directly conflicts with at least three of those prescriptions: (1) crucial areas, such as lambing grounds, migration routes, mineral licks, and areas within 1 mile of permanent water sources will receive maximum habitat protection; (2) to the extent possible, BLM will not authorize activities that result in permanent human occupation of, or dwellings within, desert bighorn habitat; and (3) new road construction will be minimized in desert bighorn habitats.

Despite the well-intentioned development of renewable energy projects, those that impact crucially important wildlife habitat are not acceptable, particularly those that directly conflict with stated BLM habitat objectives. Development of the Soda Mountains Solar Project, as proposed, conflicts with previously- and clearly-stated BLM management approaches. We urge that this project not be implemented, given the impacts to desert bighorn sheep and potential adverse impacts on bighorn population persistence. We respectfully request notification as consideration of this project occurs.

Sincerely,

Gray N. Thornton
President & CEO

Kevin Hurley
Conservation Director

cc: California WSF
Society for the Conservation of Bighorn Sheep

720 Allen Ave., Cody, WY 82414 | tel: 1.307.527.6261 | fax: 1.307.527.7117 |
email: info@wildsheepfoundation.org | website: www.wildsheepfoundation.org

AMERICAN LANDS ACCESS ASSOCIATION



Shirley Leeson
ALAA President
P.O. Box 54398
San Jose, CA 95154

January 12, 2015

Secretary of the Interior, Sally Jewell
United States Department of the Interior
1849 C. Street, NW
Washington, DC 20240

Dear Secretary Jewell,

The American Lands Access Association (ALAA) opposes the Soda Mountain Solar Project at its current location because it jeopardizes landscape level planning, undermines the Bureau of Land Management's multiple use mandate and we believe that a new comprehensive analysis of additional private land alternatives for the project should be conducted immediately.

The purpose of ALAA is to promote and ensure the rights of amateur mineral and fossil collecting, recreational prospecting and mining, and the use of public and private lands for educational and recreational purposes; and to carry the voice of all amateur collectors and hobbyists to our elected officials, government regulators and public land managers.

ALAA is an organization that is present wherever there are hobbyist and recreational users of our public lands whose interests and concerns are not being heard or are being jeopardized by proposed policy, regulation or legislation at the local, state and federal level.

The 4,000-acre Soda Mountain Solar project, if constructed, would encroach upon the boundaries of the Mojave National Preserve, a variety of BLM recreational areas and the Razor Off-Road Vehicle Area. It would destroy unobstructed view from the Mojave National Preserve and adjacent BLM lands. Construction of the project's roads, photovoltaic panels, facilities and other infrastructure would also

AMERICAN LANDS ACCESS ASSOCIATION

preclude the reestablishment of a critical bighorn sheep wildlife corridor that would allow these iconic desert animals to move between the Mojave National Preserve, the Avawatz Mountains and Death Valley National Park – one that scientists have called the most important restorable bighorn sheep corridor across the entire southeastern Mojave Desert.

In closing, ALAA opposes the current location of the Soda Mountain Solar Project and urges the Department of Interior to conduct a new study analyzing potential private lands throughout the California Desert and California's Central Valley for alternate project sites.

Sincerely,

Shirley Leeson, President
American Lands Access Association (ALAA)
P.O. Box 54398
San Jose, CA 95154
619-460-6128

Defenders of Wildlife * National Parks Conservation Association * Sierra Club

January 15, 2015

The Honorable Sally Jewell
Secretary, Department of the Interior
Attn: Tommy Beaudreau, Chief of Staff
1849 C Street, N.W.
Washington DC 20240

Re: Relocating Soda Mountain Solar and California Desert Landscape Planning

Dear Secretary Jewell,

We write on behalf of our more than 4.5 million members and supporters committed to fighting climate change and ensuring conservation in the California desert. Our organizations are firmly committed to transitioning away from fossil fuels as soon as possible, and we recognize and support the role that renewable energy must play in this transition. For this reason, we are encouraged by the Department's efforts to identify locations best suited for large-scale renewable energy, and others necessary to preserve fragile biological resources, through initiatives like the BLM's Solar Energy Program and the Desert Renewable Energy Conservation Plan (DRECP). We thank you for your commitment to landscape-scale conservation initiatives across the country.

We understand that the Interior Department will be deciding soon whether or not to permit the Soda Mountain Solar project, currently proposed to be built immediately adjacent to the Mojave National Preserve. We urge the Department to deny the project permit at its proposed location and work to relocate the project to a lower impact location better aligned with conservation and landscape-scale planning. The project is proposed in a location that includes rich natural and cultural resources, migratory bighorn sheep connectivity and desert tortoise habitat, and scenic and recreational tourism values. Since its inception, the project's proposed location has been inconsistent with the Department's landscape-scale planning efforts, including the Solar Energy Program and the recently unveiled Desert Renewable Energy Conservation Plan draft.

This incompatible project, if permitted by the Department, could undermine the intent of, and prevent progress on, landscape planning efforts. On the other hand, if a decision is made to deny the permit and focus on relocation, it will clearly reaffirm the Department's commitment to landscape-scale conservation in the California desert. The opportunity to secure this meaningful conservation victory should be seized upon.

Our organizations stand committed to advancing your bold and important California planning agenda that includes the DRECP. A decision to relocate the Soda Mountain Solar project would serve as a noteworthy milestone in efforts to put renewable energy projects and

transmission on lower-impact locations with minimal impacts to wildlife, cultural and biological resources, and recreation.

Thank you for your leadership on landscape-scale planning and conservation in the California desert. We look forward to your decision on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie Rappaport Clark". The signature is fluid and cursive, with the first name "Jamie" being the most prominent.

Jamie Rappaport Clark
President and CEO
Defenders of Wildlife

A handwritten signature in blue ink, appearing to read "Clark Bunting". The signature is stylized and cursive, with the first name "Clark" being the most prominent.

Clark Bunting
President and CEO
National Parks Conservation Association

A handwritten signature in black ink, appearing to read "Michael Brune". The signature is cursive and clearly legible.

Michael Brune
Executive Director
Sierra Club

Four members of BLM's Desert Advisory Council wrote letters to DOI urging DOI relocate the Soda Mountain Solar project. These members are leaders in their communities of diverse interests such recreational and OHV users and wildlife conservation. These individuals have distinguished themselves based on their service to BLM as Desert Advisory Council members dedicated to advising and supporting the agency. Like others who have weighed in opposing the proposed location of the project, these communities are essential stakeholders for a successful, credible DRECP.

From: April Sall

Sent: Tuesday, February 3, 2015 4:29 PM

To: tommy_beaudreau@ios.doi.gov

Cc: jon_jarvis@nps.gov; nkornze@blm.gov

Subject: Time Sensitive: Relocate Soda Solar project

Dear Mr. Beaudreau:

I am chair of the Bureau of Land Management Desert Advisory Council and am independently writing you to respectfully request that the Soda Mountain Solar Project be relocated.

The Soda Mountain Solar Project jeopardizes the restoration of what scientists have stated is the most important restorable bighorn sheep corridor in the entire southeastern Mojave Desert. Moreover, the project would have irreversible adverse impacts to water resources and the Mojave National Preserve's scenic viewsheds and night skies.

As a biologist and land manager of desert preserves I urge you to conserve these sensitive desert resources and critical ecological corridors. Please relocate this project to an area that does not have a detrimental effect to our national parks, wildlife migration corridors or archaeological and historical heritage. This project in particular has viable disturbed lands further to the west that would be part of the same transmission cluster and connection and are a far more appropriate location for this intensive impact. Unfortunately for the desert, many poorly sited renewable energy projects were fast-tracked and approved in high conflict areas, even with unmitigatable impacts. It is up to all of us to set a precedent for appropriate project siting and protect our treasured landscapes and it will take the Administration's and Department of Interiors leadership to do so.

Respectfully,

April Sall

From: Randy Banis
Sent: Tuesday, January 20, 2015 6:09 PM
To: Tommy Beaudreau
Cc: Jon Jarvis; Neil Kornze
Subject: Soda Mountain Solar

Dear Mr. Beaudreau,

I'm writing to request that the Solar Mountain Solar Project be relocated due to the significant negative impacts on recreation that will result from its proposed site. I am familiar with the project application as a leader within the off-highway vehicle community and as a member of the Bureau of Land Management's Desert Advisory Council.

The Soda Mountain Solar Project proposes to locate adjacent to the BLM's designated Razor OHV Open Area which provides a highly unique recreational experience within this remote and unspoiled setting. Both during and after construction the project would detrimentally alter the area's dark skies and back country ambience that is now enjoyed by thousands of visitors. Furthermore, the proposed relocation of Razor Road, which provides the only access to the OHV Area, from a flat and braided wash to high upon a rocky hillside will pose great difficulty for visitors compared to its current alignment.

I am also concerned about probable impacts to the world famous Mojave Road, a prime candidate for a National Recreation Trail designation, that passes very close to the proposed project site. The most important recreational values enjoyed by travelers on the Mojave Road are remoteness and the natural setting, both of which would be negatively affected.

Lastly, I'm concerned that impacts to the project site posed by regular OHV use on the immediately adjacent lands will result in future restrictions for recreational use. As once it is built, the project is not likely it will be moved in order to avoid such impacts as dust and unauthorized visitation by users.

OHV users suffered the loss of some 80,000 acres of popular and remote OHV lands due to the 2014 expansion of the Marine Corps base at Twentynine Palms. Locating a utility-scale solar energy generation facility immediately adjacent to the Razor OHV Open Area will yield additional losses to the OHV recreation community by greatly reducing the quality of experience we enjoy as visitors.

Please relocate this project to an area that does not have a detrimental affect on the few remaining acres that are available for OHV open use recreation.

Sincerely yours,

Randy Banis
Editor, DeathValley.com

44404 16th Street West
Suite 204
Lancaster, CA 93534
(661) 942-2429
RBanis@DeathValley.com

From: Houston, Don
Sent: Tuesday, January 20, 2015 3:09 PM
To: 'tommy_beaudreau@ios.doi.gov'
Cc: 'jon_Jarvis@nps.gov'; 'nkornze@blm.gov'
Subject: Time Sensitive: Relocate Soda Mountain Solar Project

Dear Mr. Beaudreau:

I appreciate the opportunity to comment on the Soda Mountain Solar Project. I visited the site of the proposed solar project during a Bureau of Land Management sponsored field trip for the Desert Advisory Council (DAC) of which I am a member. I have also participated in DAC meetings during which the project was discussed and public comment received. I am independently writing you to respectfully request that the Soda Mountain Solar Project be relocated.

The Soda Mountain Solar Project jeopardizes the restoration of what scientists have stated is the most important restorable bighorn sheep corridor in the entire southeastern Mojave Desert. Moreover, the project would have irreversible adverse impacts to water resources and the Mojave National Preserve's scenic viewsheds and night skies.

Please relocate this project to an area that does not have a detrimental effect to our national parks, wildlife migration corridors or archaeological and historical heritage.

Respectfully,

Don Houston

San Diego, CA

From: Al Muth
Sent: Tuesday, January 20, 2015 2:31 PM
To: tommy_beaudreau@ios.doi.gov
Cc: jon_Jarvis@nps.gov; nkornze@blm.gov
Subject: Time Sensitive: Relocate Soda Mountain Solar Project

Dear Mr. Beaudreau:

Thank you for the opportunity to comment on the Soda Mountain Solar Project. I've visited the proposed site as a member of the Bureau of Land Management Desert Advisory Council and participated in Desert Advisory Council meetings where the project was discussed. In my view the proposed project site is ill conceived and will have a significant impact on desert bighorn sheep, the Mojave National Preserve, and the recreating public.

A report to the BLM from prominent bighorn sheep biologists is attached. Their concerns should not be taken lightly.

The Desert Advisory Council has also received concerned comments from the public regarding off-road vehicle access to trails and traditional rock hounding sites that would be blocked by the proposed project.

In my opinion the proposed project would have irreversible detrimental impacts and should be relocated to another area that would not have significant impacts to our national parks, wildlife, and public access to BLM lands.

Respectfully,



Allan Muth, Ph.D.
Member, DAC