



October 11, 2021

Division Chief Katrina Slayton  
Kern County Planning and Natural Resources Department  
2700 "M" Street, Suite 100  
Bakersfield, California 93301                      via email [SlaytonK@kerncounty.com](mailto:SlaytonK@kerncounty.com)

Regarding: Aratina Solar Project, Boron California

Dear Ms. Slayton and supervisors,

The Morongo Basin Conservation Association is responding to the call for comments regarding the Aratina Solar Project. This egregious Project is proposed to be built on 2,317 acres, or 3.6 square miles, of pristine Mojave Desert habitat surrounding the community of Boron.

This project would destroy over 4200 **Joshua trees** protected as threatened species under the California Endangered Species Act. This undisturbed Joshua Tree Woodland is a hundreds to thousands years old functioning system comprised of interdependent species.

The Joshua tree is dependent on one species of yucca moth for pollination. The codependent yucca moth depends on this one species of **Joshua tree** for reproduction. The **yucca moth** (*Tegeticula synthetica*) life cycle spans one year, but most of this is spent in the pupal stage underground. This Project would eliminate millions of moth pupa with no ability to recover. The affect this would have on the reproduction of the Joshua trees is unknown.

This undisturbed Joshua Tree Woodland system is vital to the survival of over 140,000 Special Status Plants including the many individual rare **Barstow woolly sunflowers**.

This undisturbed Joshua Tree Woodland system is vital for the diminishing populations of the Federally Threatened **desert tortoise**.

This undisturbed Joshua Tree Woodland system is vital for the diminishing populations of the Federally Threatened and California Endangered **burrowing owl, kit fox and American badger**.

The removal of the established vegetation, biological soil crusts, and centuries old desert pavement soil types over large areas creates opportunities for **airborne dust** (PM2.5 and PM10) when the wind blows. There is little history of successful mitigation of dust in utility scale renewable energy installations. **Visual, biological resources and public health** problems - from

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MBCA is a 501(c)3 non-profit, community based, all volunteer organization

**heart disease to Valley Fever** will be inflicted on adjacent and downwind community populations. All breathing humans are sensitive receptors.

Removal of thousands of acres of Joshua Tree Woodland erases the visual character and adversely impacts the value of all adjacent homes and in the nearby town of Boron.

This centuries, to thousands of years old undisturbed Joshua Tree Woodland system captures and stores carbon in the underground mycorrhizae and caliche. Deeper layers of caliche were formed during the last Ice Age. Vegetation removal and installation of pilings for the panels would release the carbon into the atmosphere. Recovery takes thousands of years.

This Project has severe impacts for rural communities and the environment. It does not support the federal and state climate change mandates to preserve 30 percent of our lands to support carbon sequestration and biodiversity. The burden of renewable energy build-out should not be borne by rural communities when the demand for electricity is in the urban cities.

We request that the Aratina Solar Project not be approved on the 5 parcels of undisturbed land surrounding Boron, California.

Sincerely,

Steve Bardwell, President  
For the Board and our Members.

Philip Peters, Chairman [District1@kerncounty.com](mailto:District1@kerncounty.com),  
Zack Scrivner [District2@kerncounty.com](mailto:District2@kerncounty.com),  
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