

**CALIFORNIA STATE LANDS
COMMISSION**

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Established in 1938

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September 30, 2024

File Ref: SCH #2022080518

Aron Liang
San Bernardino County
Land Use Services Department, Planning Division
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415-0187

**Subject: Revised Environmental Impact Report for Sienna Solar Recirculated
DEIR - PROJ-2022-00013**

Dear Aron Liang:

The California State Lands Commission (Commission) staff has reviewed the subject Revised Environmental Impact Report (REIR) for the Sienna Solar Recirculated DEIR - PROJ-2022-00013 (Project), which is being prepared by San Bernardino County. San Bernardino County is the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). The Commission will act as a potential responsible agency because of its duty as the trustee of school lands to monitor projects that could directly or indirectly impact these lands.

Project Description

The proposed Sienna Solar and Storage Project and the proposed Calcite Substation together represent the proposed Project under CEQA. 99MT 8ME, LLC proposes to construct and operate a utility scale, solar photovoltaic electricity generation facility and energy storage within an approximately 1,854-acre site. Southern California Edison (SCE) proposes to construct and operate the Calcite Substation at a separate 75-acre site. The Sienna Project will interconnect at the SCE Calcite Substation via a proposed overhead and/or underground 220-kV gen-tie line, in addition to other ancillary facilities utilizing private and potentially

public Rights of Way (ROWs). The Project would provide energy to the electric grid to meet increasing demand for in-state generation and interconnect directly to the SCE electrical transmission system.

Commission Jurisdiction

In 1853, the United States Congress granted to California nearly 5.5 million acres of land for the specific purpose of supporting public schools. In 1984, the State Legislature passed the School Land Bank Act (Act), which established the School Land Bank Fund (SLBF) and appointed the Commission as its trustee (Pub. Resources Code, § 8700 et seq.). The Act directed the Commission to develop school lands into a permanent and productive resource base for revenue generating purposes. The Commission manages approximately 462,830± acres of school lands still held in fee ownership by the State and the reserved mineral interests on an additional 790,000± acres where the surfaces estates have been sold. Revenue from school lands is deposited in the State Treasury for the benefit of the Teachers' Retirement Fund (Pub. Resources Code, § 6217.5).

It is staff's understanding that an alternative Gen-Tie route could occupy a School Lands parcel under the jurisdiction of the Commission (Assessor Parcel Number 0452-011-34). If any portion of the proposed project will occupy State-owned School Lands, then the project proponent will be required to obtain a lease. The lease application can be submitted through the Commission's [Online System for Customer Applications and Records](#).

Thank you for the opportunity to comment on the Project. As a potential responsible and trustee agency, the Commission will need to rely on the Final REIR for the issuance of any potential new lease as specified above and, therefore, staff requests that you consider these comments prior to certification of the REIR.

If the County approves the alternative Gen-Tie route affecting APN 0452-011-34, then please send electronic copies of the Final REIR, Mitigation Monitoring Program, Notice of Determination, approving resolution, CEQA Findings, and, if applicable, Statement of Overriding Considerations when they are final. Please note that federal and state laws require all government entities to improve accessibility of information technology and content by complying with established accessibility requirements. (29 U.S.C. § 794d; 36 C.F.R. § 1194.1 et seq.; Gov. Code, § 7405.) California State law prohibits State agencies from publishing on their websites content that does not comply with accessibility requirements. (Gov. Code, § 115467.) Therefore, any documents submitted to Commission staff during the processing of a lease or permit that will be posted online, including relevant CEQA documentation, must meet accessibility

requirements for Commission staff to place the application on the Commission agenda.

Refer questions concerning environmental review to Sarah Mongano, Senior Environmental Scientist, at sarah.mongano@slc.ca.gov or (916) 574-1889. For questions concerning Commission leasing jurisdiction, please contact Drew Simpkin, Public Land Management Specialist, at drew.simpkin@slc.ca.gov or (916) 574-2275.

Sincerely,

A handwritten signature in black ink that reads "Nicole Dobroski". The signature is written in a cursive, flowing style.

Nicole Dobroski, Chief
Division of Environmental Science,
Planning, and Management

cc: Office of Planning and Research
Andrew Kershen, LEGAL, Commission
Drew Simpkin, LMD, Commission
Sarah Mongano, DESPM, Commission