

| DOCKETED | |
|-------------------------|--|
| Docket Number: | 24-OPT-03 |
| Project Title: | Soda Mountain Solar |
| TN #: | 264349 |
| Document Title: | Second Determination of Incomplete Application and Request for Information for the Soda Mountain Solar Project (24-OPT-03) |
| Description: | N/A |
| Filer: | Marichka Haws |
| Organization: | California Energy Commission |
| Submitter Role: | Commission Staff |
| Submission Date: | 6/18/2025 11:01:43 AM |
| Docketed Date: | 6/18/2025 |



June 18, 2025

Hannah Gbeh
Chief Executive Officer
Resolution Environmental
262 B. Avenue
Coronado, California 92118

Second Determination of Incomplete Application and Request for Information for the Soda Mountain Solar Project (24-OPT-03)

Dear Hannah Gbeh:

California Energy Commission (CEC) staff confirmed receipt on August 1, 2024, of an Opt-In Application for the Soda Mountain Solar Project (project) (24-OPT-03). Soda Mountain Solar, LLC ("Applicant"), proposes to construct, operate, and maintain a 300 megawatt (MW) solar photovoltaic (PV) electrical generating and 300 MW battery storage facility and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid. The project is located on approximately 2,670 acres of land administered by the U.S. Bureau of Land Management, in San Bernardino County.

CEC staff issued a Determination of Incomplete Application and Request for Information for the project on September 3, 2024 (TN 258896). On February 10, 2025, Resolution Evolution, the applicant's consultant, filed the final batch of data responses to staff's first set of data requests. Based on staff's subsequent review, applicant's responses remain incomplete.

Under Public Resources Code, section 25545.4 (b), CEC staff requests the information described in the attachments to this letter. The attachments consist of (1) data completeness worksheets listing the requirements specified in statute and regulations, and (2) requests for additional information needed for staff to complete its environmental analysis of the proposed project, which includes input from partner agencies who have a memorandum of understanding with the CEC to perform a related review for opt-in applications. The data requests fall within the topics of executive summary, air quality/greenhouse gas emissions, biological resources, land use, public health, traffic and transportation, visual resources, and worker safety.

All requested information is reasonably necessary to prepare an Environmental Impact Report as part of a CEC Staff Assessment and to support a decision on the application, including all the findings required in Chapter 6.2 of Division 15 of the Public Resources Code sections 25545 et seq.

CEC staff asks the applicant to file complete responses by technical area to the requested data in as few submittals as possible and provide an estimated timeline of when the remaining data will be submitted. CEC staff asks that upon submitting complete responses, the applicant provide a statement that its response to the request for information is complete and addresses all identified deficiencies.

Consistent with Public Resources Code, section 25545.4(c)(2) and California Code of Regulations, title 20, section 1878, upon receipt of all information responsive to this request, CEC staff will finalize review of the information provided and document its determination regarding application completeness in a subsequent letter.

If you have any questions about the information identified as necessary to complete the application, please email the CEQA project manager, Lisa Worrall, at lisa.worrall@energy.ca.gov.

Sincerely,



Drew Bohan
Executive Director

Attachments

Attachment A: Revision 1 Data Completeness Worksheets for Title 20, section 1877

Attachment B: Revision 1 Data Requests

Soda Mountain Solar Project (24-OPT-03)

Second Completeness Review

Incomplete

1. Air Quality (includes Greenhouse Gases)
2. Biological Resources
3. Executive Summary
4. Land Use
5. Public Health
6. Traffic and Transportation
7. Visual Resources
8. Worker Safety

Complete

1. Mandatory Opt-in Requirements
2. Efficiency, Energy, and Energy Resources
3. Facility Design
4. Alternatives
5. Cultural/Tribal Cultural Resources
6. Geological Hazards
7. Hazardous Materials Handling
8. Noise and Vibration
9. Paleontological Resources
10. Project Description
11. Reliability
12. Socioeconomics
13. Soils
14. Transmission System Safety and Nuisance
15. Transmission System Design
16. Waste Management
17. Water Resources
18. Wildfire

Attachment A

Revision 1 Data Completeness Worksheets
for Title 20, section 1877

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01

September 2024

Date: June 2025

Technical Area: Air Quality

Project: Soda Mountain Solar Project

Technical Staff:

Yifan Ding/Jacquelyn

Record

Joseph Hughes

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior:

Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|---|---|--------------------|---|
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A) | Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. | Section 3-3, Subsection 3.3.3.2, pp. 3.3-23 to 3.3-34 | Yes | |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B) | Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and | Section 3-3, Subsection 3.3.3.2, Table. 3.3-6, Subsection 3.3.3.6, pp. 3.3-29 to 3.3-34 | Yes | |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C) | A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference. | Section 3-3, Subsection 3.3.6, pp. 3.3-35 to 3.3-36 | Yes | |
| Appendix B (g) (1) | ...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for | Section 3-3, Subsection 3.3.5, pp. 3.3-34 to 3.3-35; Section 3.8 Subsection 3.8.2.2, pp 3.8-8 to 3.8-9, Table 3.8-2; Appendix C, Section 3.3, Section 6.3 Data Request Response Set #1 (TN #: 259876), Exhibit 3, pp. 43 to 46; Section 3-3 (TN #: 259703), Subsection 3.3.5, p. 3.3-31; | No | See DR AQ-4, DR AQ-6 and DR GHG-1 to DR GHG-5 See REV 1 DR PH-1 to REV 1 DR PH-4, REV 1 DR GHG-1 to REV 1 DR GHG-4 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01

September 2024

Date: **June 2025**

Technical Area: **Air Quality**

Project: Soda Mountain Solar Project

Technical Staff:

Yifan Ding/Jacquelyn

Record

Joseph Hughes

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior:

Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------|---|--|--------------------|---|
| | the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan. | <u>Section 3-8 (TN #: 259701), Subsection 3.8.3.2, pp. 3.8-10 to 3.8-11</u> | | |
| Appendix B (g) (8) (A) | The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance. | Section 3-3, Subsection 3.3.2, p. 3.3-13 <u>Section 3-3 (TN #: 259703), Subsection 3.3.3.6, Table 3.3-8, p. 3.3-28</u> | NoYes | See DR-AQ-3 |
| Appendix B (g) (8) (B) | The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility. | Section 3-3, Subsection 3.3.3.3, p. 3.3-27 | Yes | |
| Appendix B (g) (8) (C) | A description of the control technologies proposed to limit the emission of criteria pollutants. | Appendix C, Subsection 7.1 and Subsection 7.4 | Yes | |
| Appendix B (g) (8) (D) | A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids. | N/A | N/A | N/A |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: September 2024
June 2025

Technical Area: Air Quality Project: Soda Mountain Solar Project Technical Staff: Yifan Ding/Jacquelyn Record

Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Joseph Hughes
Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---------------------------|--|--|--------------------|--|
| Appendix B (g) (8) (E) | The emission rates of criteria pollutants and greenhouse gases (CO ₂ , CH ₄ , N ₂ O, and SF ₆) from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources. | Section 3-3, Subsection 3.3.3.6, p. 3.3-30, Table 3.3-7, Subsection 3.3.3.6, p. 3.3-31, Table 3.3-8; Section 3-8 Subsection 3.8.3.4 pp. 3.8-10 to 3.8-12, Table 3.8-3 to Table 3.8-5; Appendix C, Section 3.3, and 6.3, Table 12 and 13, pp. 19 to 21; <u>Section 3-8 (TN #: 259701), Subsection 3.8.3.2, pp. 3.8-10 to 3.8-11</u> | No | See DR GHG-4 and DR GHG-5 <u>See REV 1 DR PH-1, REV 1 DR PH-2, REV 1 DR GHG-2 through REV 1 DR GHG-4</u> |
| Appendix B (g) (8) (F)(i) | A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode. | Section 3-8, Subsection 3.8.3.4, pp. 3.8-10 to 3.8-12, Table 3.8-3 to 3.8-5; Appendix C, Section 6.2, p. 41 <u>Section 3-8 (TN #: 259701), Subsection 3.8.3.2, pp. 3.8-10 to 3.8-11</u> | No | See DR GHG-6 and DR GHG-7 <u>See REV 1 DR GHG-1 through REV 1 DR GHG-4</u> |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01

September 2024

Date: **June 2025**

Technical Area: **Air Quality**

Project: Soda Mountain Solar Project

Technical Staff: Yifan Ding/Jacquelyn Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: **Wenjun Qian**

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|----------------------------|---|---|----------------------|---|
| Appendix B (g) (8) (F)(ii) | A description of the project's planned initial commissioning phase, which is the phase between the first firing of emissions sources and the commercial operations date, including the types and durations of equipment tests, criteria pollutant emissions, and monitoring techniques to be used during such tests. | N/A | N/A | N/A |
| Appendix B (g) (8) (G) | The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary. | Appendix C, Table 3, p. 31, Table 4, pp. 31 to 32, Table 5, p. 32 <u>Section 3-3 (TN #: 259703), Subsection 3.3.2.4, pp. 3.3-19 to 3.3-21</u> | No <u>Yes</u> | See DR-AQ-2 |
| Appendix B (g) (8) (H) | One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district. | Appendix C, Attachment A (from Appendix C), pp. 142 to 151 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01

September 2024

Date: **June 2025**

Technical Area: **Air Quality**

Project: Soda Mountain Solar Project

Technical Staff:

Yifan Ding/Jacquelyn

Record

Joseph Hughes

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior:

Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-----------------------------|---|---|--------------------|---|
| Appendix B (g) (8) (H) (i) | If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995)), which is incorporated by reference in its entirety. | Appendix C, Attachment B (from Appendix C), pp. 133 to 135 | Yes | |
| Appendix B (g) (8) (H) (ii) | The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site. | Appendix C, Attachment A (from Appendix C), pp. 142 to 151 | Yes | |
| Appendix B (g) (8) (I) | An evaluation of the project's direct and cumulative air quality impacts, consisting of: | -- | -- | -- |
| Appendix B (g) (8) (I) (i) | A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM ₁₀) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NO _x), sulfur | Section 3-3, Subsection 3.3.3.6, Table 3.3-7, p. 3.3-30 Data Request Response Set #1 (TN #: 259876), Exhibit 3, pp. 43 to 46 out of 153 | No | See DR AQ-4 See REV 1 DR AQ-1, REV 1 DR AQ-2 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01

September 2024

Date: **June 2025**

Technical Area: **Air Quality**

Project: Soda Mountain Solar Project

Technical Staff:

Yifan Ding/Jacquelyn

Record

Joseph Hughes

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior:

Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------------|---|--|---------------------------------|---|
| | dioxide (SO ₂), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM ₁₀) and particulate matter less than 2.5 microns in diameter (PM _{2.5}) from construction-related equipment; | | | |
| Appendix B (g) (8) (I) (ii) | A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NO _x , SO ₂ , CO, PM ₁₀ , and PM _{2.5}) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions; | Section 3-3, Subsection 3.3.3.6, Table 3.3-8, p. 3.3-31 <u>Data Request Response Set #1 (TN #: 259876), Exhibit 3, pp. 43 to 46 out of 153</u> | No | See DR-AQ-4 <u>See-REV 1 DR PH-3, REV 1 DR PH-4</u> |
| Appendix B (g) (8) (I) (iii) | A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions | Section 3-3, Subsection 3.3.5, pp. 3.3-34 to 3.3-35 <u>Section 3-3 (TN #: 259703), Subsection 3.3.5, p. 3.3-31</u> | No <u>Yes</u> | See DR-AQ-6 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01

September 2024

Date: **June 2025**

Technical Area: **Air Quality**

Project: Soda Mountain Solar Project

Technical Staff:

Yifan Ding/Jacquelyn

Record

Joseph Hughes

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior:

Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-----------------------------|--|--|--------------------|---|
| | concentrations will cause or contribute to a violation of any ambient air quality standard; and | | | |
| Appendix B (g) (8) (I) (iv) | An air dispersion modeling analysis of the impacts of the initial commissioning phase emissions on state and federal ambient air quality standards for NO _x , SO ₂ , CO, PM ₁₀ , and PM _{2.5} . | Appendix C, Attachment B (from Appendix C), Table 1, p. 137, Attachment C (from Appendix C), pp. 153 to 165 Data Request Response Set #1 (TN #: 259876), Exhibit 3, pp. 43 to 46 | No Yes | See DR AQ-4 to DR AQ-5 |
| Appendix B (g) (8) (J) | If an emission offset strategy is proposed to mitigate the project's impacts under (g)(1), provide the following information: | -- | -- | -- |
| Appendix B (g) (8) (J) (i) | The quantity of offsets or emission reductions that are needed to satisfy air permitting requirements of local permitting agencies (such as the air district), state and federal oversight air agencies, and the California Energy Commission. Identify by criteria air pollutant, and if appropriate, greenhouse gas; and | Appendix C, Subsection 7.2, pp. 59 to 67 | Yes | |
| Appendix B (g) (8) (J) (ii) | Potential offset sources, including location, and quantity of emission reductions; | Appendix C, Table 10, p. 61, Table 11, pp. 61 to 62, Table 12, p. 65 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01

September 2024

Date: **June 2025**

Technical Area: **Air Quality**

Project: Soda Mountain Solar Project

Technical Staff:

Yifan Ding/Jacquelyn

Record

Joseph Hughes

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior:

Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------|---|---|----------------------|---|
| Appendix B (g) (8) (K) | A detailed description of the mitigation, if any, which an applicant may propose, for all projects impacts from criteria pollutants that currently exceed state or federal ambient air quality standards but are not subject to offset requirements under the district's new source review rule. | Section 3.3, Subsection 3.3.4, p. 3.3-34 | Yes | |
| Appendix B (i) (1) (A) | Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and | Section 3-3, subsection 3.3.1, Table 3.3-1, pp. 3.3-1 to 3.3-13 <u>Section 3-8 (TN #: 259701), Subsection 3.8.3.2, pp. 3.8-10 to 3.8-11</u> | No <u>Yes</u> | See DR-GHG-1 to DR-GHG-3 |
| Appendix B (i) (1) (B) | Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the | Section 3.3, Subsection 3.3.2, p. 3.3-13 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01

September 2024

Date: **June 2025**

Technical Area: **Air Quality**

Project: Soda Mountain Solar Project

Technical Staff:

Yifan Ding/Jacquelyn

Record

Joseph Hughes

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior:

Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|--------------------|---|---|--------------------------|---|
| | exclusive authority of the Commission to certify sites and related facilities. | | | |
| Appendix B (i) (2) | The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff. | Section 3.3, Subsection 3.3.2, p. 3.3-13 | Yes | |
| Appendix B (i) (3) | A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits. | Section 3.3, Subsection 3.3.2, p. 3.3-13 Data Request Response Set #1 (TN #: 259876), Exhibit 1, pp. 36 to 46 | No Yes | See DR AQ-1 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ___ Incomplete X

Revision No. 01 Date: September 2024

June 2025

Technical Area: Biological Resources

Project: Soda Mountain Solar Project

Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|---|--|--------------------|---|
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A) | Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document; | Section 3.4, Subsection 3.4.1.2, p. 3.4-5, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, p. 3.4-13 to 3.4-16; Subsection 3.4.4, Table 6, Subsection 3.4.4.4, pp. 3.4-34, 3.4-38, Subsection 3.4.5, pp. 3.4-45 to 3.4-46; Appendix D1, Section 3.1.2, pp. 17 to 18 <u>Section 3-1 (TN #: 259701), Subsection 3.1-1 to 3.1-20, pp. 3 to 10</u> | No | See DR-BIO-1 to DR-BIO-18 <u>See REV 1 DR BIO-1 to REV 1 DR BIO-3</u> |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B) | Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and | Section 3.4, Subsection 3.4.1.2, p. 3.4-5, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, pp. 3.4-13 to 3.4-16, Section 3.4.4.4, p. 3.4-34, 3.4-38, Section 3.4.5, p. 3.4-45 to 3.4-46; Appendix D1, Section 3.1.2, pp. 17 to 18 <u>Section 3-1 (TN #: 259701), Subsection 3.1-1 to 3.1-20, pp. 3 to 10.</u> | No | See DR-BIO-1 to DR-BIO-18 <u>See REV 1 DR BIO-1 and REV 1 DR BIO-3</u> |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C) | A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference. | Section 3.4 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: ~~September 2024~~ **June 2025**

Technical Area: **Biological Resources**

Project: Soda Mountain Solar Project

Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|---|--|---------------------------------|--|
| [OPT-IN ONLY] Cal. Code Regs., tit. 20, § 1877 (a) | If the applicant is seeking incidental take authorization as described in California Fish and Game Code section 2081(b), the application shall include the information required in California Code of Regulations, title 14, section 783.2(a)(1)-(a)(10). If the applicant is seeking lake and streambed alteration authorization under Fish and Game Code section 1602, the application shall include the information required in California Fish and Game Code section 1602(a)(1)(A)-(F). | Section 3.4, Section 3.4.3.5, pp. 3.4-13 to 3.4-14 <u>Section 3-1 (TN #: 259701), Subsections 3.1-3, 3.1-4, 3.1-8, and 3.1-9.</u> | No <u>Yes</u> | See DR-BIO-3, DR-BIO-4, DR-BIO-8, and DR-BIO-9 |
| Appendix B (g) (1) | ...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used | Section 3.4, Subsection 3.4.1.2, p. 3.4-5, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, p. 3.4-13 to 3.4-16, Subsection 3.4.4.4, pp. 3.4-34, 3.4-38, Subsection 3.4.4, Table 6, Subsection 3.4.5, pp. 3.4-45 to 3.4-46; Appendix D1, Section 3.1.2, pp. 17 to 18 <u>Section 3-1 (TN #: 259701), Subsection 3.1-1 to 3.1-20 pp. 3 to 10.</u> | No | See DR-BIO-1 to DR-BIO-18 <u>See REV 1 DR BIO-1 to REV 1 DR BIO-3</u> |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: September 2024
June 2025

Technical Area: Biological Resources Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW

Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-------------------------|---|--|--------------------|---|
| | to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan. | | | |
| Appendix B (g) (13) (A) | A regional overview and discussion of terrestrial and aquatic biological resources, with particular attention to sensitive biological resources within 10 miles of the project. In the discussion include a list of the USGS topographic quadrangle(s) utilized to search records from the California Natural Diversity Database (CNDDB), and a citation which includes the date the CNDDB was accessed. Include a map at a scale of 1:6,000 (under confidential cover) and at 1:350,000 (for public) showing sensitive biological resource location(s) in relation to the project site and related facilities and any boundaries of a local Habitat Conservation Plan or similar open space land use plan or designation. Label the biological resources and survey areas as well as the project facilities. Sensitive biological resources include: | Section 3.4 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: September 2024

~~September~~ **June**
2025

Technical Area: Biological Resources

Project: Soda Mountain Solar Project

Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-------------------------------|---|---|---------------------------------|--|
| Appendix B (g) (13) (A) (i) | species listed under state or federal Endangered Species Acts; | Section 3.4, Subsection 3.4.3.5 <u>Section 3-1 (TN #: 259701), Subsection 3.1-8 p. 7.</u> | No <u>Yes</u> | See DR-BIO-8 |
| Appendix B (g) (13) (A) (ii) | species receiving consideration during environmental review under CEQA Guidelines 14 CCR Section 15380; | Section 3.4, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, pp. 3.4-14 to 3.4-16 <u>Section 3-1 (TN #: 259701), Subsection 3.1-2, 3.1-3a, 3b, and 3c, 3.1-5, 3.1-7, and 3.1-9. pp. 2 to 8.</u> | No <u>Yes</u> | See DR-BIO-2, DR-BIO-3a, b, and c, DR-BIO-5, DR-BIO-7, and DR-BIO-9 |
| Appendix B (g) (13) (A) (iii) | species identified as state Fully Protected; | Section 3.4, Subsection 3.4.3.5 <u>Section 3-1 (TN #: 259701), Subsection 3.1-9 pp. 7 to 8.</u> | No <u>Yes</u> | See DR-BIO-9 |
| Appendix B (g) (13) (A) (iv) | species covered by Migratory Bird Treaty Act; | Section 3.4, Section 3.4.3.5, p. 3.4-15 <u>Section 3-1 (TN #: 259701), Subsection 3.1-6 pp. 6 to 7.</u> | No <u>Yes</u> | See DR-BIO-6 |
| Appendix B (g) (13) (A) (v) | species and habitats identified by local, state, and federal agencies as needing protection, including but not limited to those identified by the CNDDDB, California Fish and Game Code, Title 14 of the California Code of Regulations, or where applicable, in Local Coastal Programs or in | Section 3.4, Subsection 3.4.1.2 p. 3.4-5, Section 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, pp. 3.4-13 to 3.4-16, Subsection 3.4.4, Table 6, Subsection 3.4.4.4, p. 3.4-38, Subsection 3.4.5, pp. 3.4-45 to | No | See DR-BIO-1 to DR-BIO-18 <u>See REV 1 DR BIO-1 to REV 1 DR BIO-3</u> |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: September 2024

June

2025

Technical Area: Biological Resources

Project: Soda Mountain Solar Project

Technical Staff:

C. Huntley, J. Miner, J.

Wood/ CDFW

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior:

Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|--------------------------------|---|---|--------------------------|---|
| | relevant decisions of the California Coastal Commission or other responsible agency; | 3.4-46; Appendix D1, Section 3.1.2, pp. 17 to 18 <u>Section 3-1 (TN #: 259701), Subsection 3.1-1 to 3.1-20 pp. 3 to 10.</u> | | |
| Appendix B (g) (13) (A) (vi) | locally significant species that are rare or uncommon in a local context such as county or region or is so designated in local or regional plans, policies, or ordinances; | Section 3.4 | Yes | |
| Appendix B (g) (13) (A) (vii) | plant species listed as rare under the California Native Plant Protection Act; | Section 3.4, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12 <u>Section 3-1 (TN #: 259701), Subsection 3.1-2 pp. 3 to 4.</u> | No Yes | See DR-BIO-2 |
| Appendix B (g) (13) (A) (viii) | established native resident or migratory wildlife corridors or wildlife nursery sites. | Section 3.4 | Yes | |
| Appendix B (g) (13) (B) | Include a list of the species and habitat(s) observed and those with a potential to occur within 1 mile of the project site and 1,000 feet from the outer edge of linear facility corridors. Maps or aerial photographs shall include the following: | Section 3.4, Section 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5 <u>Section 3-1 (TN #: 259701), Subsection 3.1-2, 3.1-8, and Subsection 3.1-9 pp. 3 to 8.</u> | No Yes | See DR-BIO-2, DR-BIO-8, and DR-BIO-9 |
| Appendix B (g) (13) (B) (i) | Detailed maps at a scale of 1:6,000 or color aerial photographs taken at | Section 3.4 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: September 2024

June 2025

Technical Area: Biological Resources

Project: Soda Mountain Solar Project

Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-------------------------------|--|--|---------------------------------|---|
| | a recommended scale of 1-inch equals 500 feet (1:6,000) with a 30 percent overlap (provided under confidential cover) and 1:350,000 (for public viewing) that show the proposed project site and related facilities, biological resources including, but not limited to, those found during project-related field surveys and in records from the CNDDDB, and the associated areas where biological surveys were conducted. Label the biological resources and survey areas as well as the project facilities. | | | |
| Appendix B (g) (13) (B) (ii) | Provide an aerial map of the isopleth graphic depicting modeled nitrogen deposition rates. The geographical extent of the nitrogen deposition map(s) should include the entire plume and a radius of 6 (six) miles from the source, specifically identifying acres of sensitive habitat(s) within each isopleth Modeling parameters and files shall be provided. | <u>Section 3-3 (TN #: 259703), Subsection 3.3.5, p. 3.3-31 and Subsection 3.1-19 p. 10.</u> | No <u>Yes</u> | See DR-AQ-6 and DR-BIO-19 |
| Appendix B (g) (13) (B) (iii) | An aerial photo depicting state and federal jurisdictional features including state waters and wetlands | Section 3.4 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete Incomplete **X**

Revision No. **01** Date: September 2024
June 2025

Technical Area: **Biological Resources** Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW
Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------------|---|--|--------------------------|---|
| | delineated on maps at a scale of (1:2,400) showing any potential jurisdictional features delineated out to 250 feet from the edge of disturbance if wetlands occur within 250 feet of the project site and/or related facilities that would be included with the U.S. Army Corps of Engineers Section 404 Permit application, Regional Water Quality Control Board (RWQCB) application, or California Department of Fish and Wildlife Section 1600 et seq. permit requirements. For projects proposed to be located within the coastal zone, also provide aerial photographs or maps as described above that identify wetlands as defined by the Coastal Act and under the jurisdiction of the California Coastal Commission. | | | |
| Appendix B (g) (13) (B) (iv) | Provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources. | Section 3.4 | Yes | |
| Appendix B (g) (13) (C) | A discussion of the biological resources at the proposed project site and related facilities. Related facilities include, but are not limited | Section 3.4, Subsection 3.4.1.2, p. 3.4-5, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, | No Yes | See DR-BIO-1 to DR-BIO-18 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: September 2024

~~September 2024~~ **June 2025**

Technical Area: Biological Resources Project: Soda Mountain Solar Project

Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW

Project Manager: Lisa Worrall Docket: 24-OPT-03

Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-------------------------------|---|---|-------------------------|---|
| | to, laydown and parking areas, gas and water supply pipelines, transmission lines, and roads. The discussion shall address the distribution of vegetation community types, denning or nesting sites, population concentrations, migration corridors, breeding habitats, and other appropriate biological resources including the following: | Subsection 3.4.3.5, pp. 3.4-13 to 3.4-16, Subsection 3.4.4, Table 6, Subsection 3.4.4.4, pp. 3.4-34, 3.4-38, Subsection 3.4.5, pp. 3.4-45 to 3.4-46; Appendix D1, Section 3.1.2, pp. 17 to 18 <u>Section 3-1 (TN #: 259701), Subsection 3.1-1 to 3.1-18 pp. 3 to 9.</u> | | |
| Appendix B (g) (13) (C) (i) | A list of sensitive species and habitats with a potential to occur (defined in (A) above) and include status (state, federal, California Native Plant Society, global rank, state rank, etc.) | Section 3.4, Section 3.4.3.4, pp. 3.4-11 and 3.4-12 <u>Section 3-1 (TN #: 259701), Subsection 3.1-2, 3.1-3a, 3b, 3c, 3.1-8, and 3.1-9 pp. 3 to 7.</u> | No <u>Yes</u> | See DR BIO-2, DR BIO-3a, b, c, DR BIO-8, and DR BIO-9 |
| Appendix B (g) (13) (C) (iii) | Perform nitrogen deposition modeling including the complete citation for references used in determining deposition rates and location. Specify the amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status species habitats and vegetation types for wet and dry | <u>Section 3-3 (TN #: 259703), Subsection 3.3.5, p. 3.3-31 and 3.1-19 p. 10.</u> | No <u>Yes</u> | See DR AQ-6 and DR BIO-19 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: September 2024
June 2025

Technical Area: Biological Resources Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW
Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------------|---|--|--------------------|---|
| | deposition. Describe habitat and species potentially affected. | | | |
| Appendix B (g) (13) (D) | A description and results of all field studies and specialized surveys (e.g., focused and protocol) used to provide biological baseline information about the project site and associated facilities. Include copies of the CNDDDB records and field survey forms completed by the applicant's biologist(s). Identify the date(s) the surveys were completed, methods used to complete the surveys, and the name(s) and qualifications of the biologists conducting the surveys. Include: | Section 3.4 | Yes | |
| Appendix B (g) (13) (D) (i) | Current biological resources surveys conducted using appropriate field survey protocols (include references) during the appropriate season(s). State and federal agencies with jurisdiction shall be consulted for field survey protocol guidance prior to surveys if a protocol exists. | Section 3.4, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, 3.4-14 <u>Section 3-1 (TN #: 259701), Subsection 3.1-2, 3.1-3a, 3b, 3c, 3.1-5 pp. 3 to 6.</u> | No | See DR BIO-2, DR BIO-3a, b, c, and DR BIO-5 <u>See REV 1 DR BIO-1</u> |
| Appendix B (g) (13) (D) (ii) | If the project or any related facilities could impact federal or state jurisdictional wetland, provide | Section 3.4, Subsection 3.4.3.5, Subsection 3.4.4.4, p. 3.4-38 | No | See DR BIO-10 and DR BIO-13 <u>See Rev 1 DR BIO-1 and Rev 1 DR BIO-2</u> |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: September 2024

June 2025

Technical Area: Biological Resources

Project: Soda Mountain Solar Project

Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|--------------------------|--|--|---------------------------------|---|
| | completed Army Corps of Engineers wetland delineation forms or determination of wetland status pursuant to Coastal Act or CDFW requirements, as applicable to the location, name(s) and qualifications of biologist(s) completing the delineation, the results of the delineation and a table showing jurisdictional features including state waters and wetland acreage amounts to be impacted. | <u>Section 3-1 (TN #: 259701), Subsection 3.1-10 and 3.1-13 pp. 8-9.</u> | | |
| Appendix B (g) (13) (E)) | Impacts discussion of all impacts (direct, indirect, and cumulative) to biological resources from project site preparation, construction activities, plant operation, maintenance, closure, and decommissioning. Discussion shall also address sensitive species habitat impacts from air emissions (i.e., nitrogen deposition) | Section 3.4, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, pp. 3.4-14, and 3.4-16; Appendix D1, Section 4.4.2.4.2 p. 65 <u>Section 3-1 (TN #: 259701), Subsection 3.1-2, 3.1-3a, 3b, 3c, 3.1-5, 3.1-7, 3.1-8, 3.1-9, 3.1-10, 3.1-13, and 3.1-19 pp. 3 to 10.</u> | No | See DR BIO-2, DR BIO-3a, b, c, DR BIO-5, DR BIO-7, DR BIO-8, DR BIO-9, DR BIO-13 and DR BIO-19 <u>See REV 1 DR BIO-1 to REV 1 DR BIO-3</u> |
| Appendix B (g) (13) (F) | A discussion of all feasible mitigation measures and an evaluation of their anticipated efficacy in reducing the level of impacts, including, but not limited to the following: | Section 3.4, Subsection 3.4.3.5, pp. 3.4-14, 3.4-16, Section 3.4.4.4, p. 3.4-38; Appendix D1, Section 4.4.2.4.2 <u>Section 3-1 (TN #: 259701), Subsection 3.1-3a, 3b, 3c, 3.1-8, 3.1-9,</u> | No <u>Yes</u> | See DR BIO-3a, b, c, DR BIO-8, DR BIO-9, and DR BIO-13 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: September 2024

June 2025

Technical Area: Biological Resources

Project: Soda Mountain Solar Project

Technical Staff: Wood/ CDFW

C. Huntley, J. Miner, J.

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-------------------------------|---|--|--------------------|---|
| | | <u>3.1-10, and 3.1-13 pp. 3 to 10.</u> | | |
| Appendix B (g) (13) (F) (i) | All measures proposed to avoid and/or reduce adverse impacts to biological resources. | Section 3.4, Section 3.4.3.5, p. 3.4-13 <u>Section 3-1 (TN #: 259701), Subsection 3.1-3c, 3.1-4, 3.1-8, 3.1-9, and 3.1-13 pp. 3 to 10.</u> | No <u>Yes</u> | See DR BIO-3c, DR BIO-4, DR BIO-8, DR BIO-9, and DR BIO-13 |
| Appendix B (g) (13) (F) (ii) | All off-site habitat mitigation such as habitat improvement or compensation including management, and an identification of appropriate agency contacts for coordination and verification of proposed habitat mitigation measures. | Section 3.4 | Yes | |
| Appendix B (g) (13) (F) (iii) | Educational programs to enhance employee awareness during construction and operation to protect biological resources. | Section 3.4 | Yes | |
| Appendix B (g) (13) (G) | A discussion of compliance and monitoring programs to ensure the effectiveness of impact avoidance and mitigation measures incorporated into the project. | Section 3.4 | Yes | |
| Appendix B (g) (13) (H) | Submit copies of any preliminary correspondence between the project applicant and state and federal resource agencies regarding | Section 3-4 <u>Section 3-1 (TN #: 259701), Subsection 3.1-12 and 3.1-13, pp. 8 to 9.</u> | No <u>Yes</u> | See DR BIO-12 and DR BIO-13 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 01 Date: September 2024
 Technical Area: Biological Resources Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------|---|--|--------------------|---|
| | whether federal or state permits from other agencies such as the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the U.S. Army Corps of Engineers, the CDFW, and the RWQCB will be required for the proposed project. | | | |
| Appendix B (i) (1) (A) | Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and | Section 3.4 | Yes | |
| Appendix B (i) (1) (B) | Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the | Section 3.4 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒ Revision No. 01 Date: September 2024
 Technical Area: Biological Resources Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|--------------------|---|--|--------------------|---|
| | exclusive authority of the Commission to certify sites and related facilities. | | | |
| Appendix B (i) (2) | The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff. | Appendix V, Table 2-1 | Yes | |
| Appendix B (i) (3) | A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits. | Appendix V, Table 2-1 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **X**

Revision No. **01** Date: September 2024
June 2025

Technical Area: **Executive Summary**

Project: Soda Mountain Solar Project

Technical Staff: Lisa Worrall

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|--|--|---------------------------|--|
| Cal. Code Regs. Tit. 20 § 1704, (a) (4) | Each principal subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation. | Section 6; Appendix V, Table 2-2, pp. 6 to 7 | Yes | |
| Appendix B (a) (1) (A) | A general description of the proposed site and related facilities, including the location of the site or transmission routes, the type, size and capacity of the generating or transmission facilities, fuel characteristics, fuel supply routes and facilities, water supply routes and facilities, pollution control systems, and other general characteristics. | Subsection 2.2, pp. 2-1 to 2-8, Subsection 2.4, pp. 2-9 to 2-17 | Yes | |
| Appendix B (a) (1) (B) | Identification of the location of the proposed site and related facilities by section, township, range, county, and assessor's parcel numbers. | Subsection 1.3, p. 1-8; Subsection 2.3, p. 2-1; Appendix N | Yes | |
| Appendix B (a) (1) (C) | A description of and maps depicting the region, the vicinity, and the site and its immediate surroundings. | Subsection 2.3, p.2-1, Figure 2-2, p. 2-4 <u>CEC Data Response Set#1 (TN 259876), Exhibit A, Figure 1-1</u> | No | See DR-ES-1 <u>See REV 1 DR ES-1</u> |
| Appendix B (a) (1) (D) | A full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction. | Subsection 2.3.1.1, Figure 2-4, p. 2-6, Figure 2-8, p. 2-12 <u>CEC Data Response Set#1 (TN 259876), Exhibit A, Figure 1-2</u> | No <u>Yes</u> | See DR-ES-2 |
| Appendix B (a) (1) (E) | In an appendix to the application, a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1000 feet of the proposed powerplant and related facilities. Provide the direct | Appendix N <u>Appendix N Public Notice Package - October 2024 - Revision 1 (TN 259694)</u> | No <u>Yes</u> | See DR-ES-3 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **X**

Revision No. **01** Date: September 2024 **June 2025**

Technical Area: **Executive Summary**

Project: Soda Mountain Solar Project

Technical Staff: Lisa Worrall

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Eric Knight

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------|---|--|--------------------------|---|
| | mailing addresses for the owners and occupants of properties contiguous to the proposed power plant, related facilities, transmission lines, or other linear facilities as shown on the latest equalized assessment roll. Provide a map showing the parcels in the notice area. | | | |
| Appendix B (a) (2) | Project Schedule: Proposed dates of initiation and completion of construction, initial start-up, and full-scale operation of the proposed facilities. | Subsection 2.5, pp. 2-17 to 2-20, Subsection 2.6, p. 2-22 Chapter 1 Executive Summary – Revision 1 - October 2024 (TN 259693) | No Yes | See DR-ES-4 |
| Appendix B (a) (3) (A) | A list of all owners and operators of the site(s), the power plant facilities, and, if applicable, thermal host, the geothermal leasehold, the geothermal resource conveyance lines, and the geothermal re-injection system, and a description of their legal interest in these facilities. | Subsection 1.6, p. 1-2 | Yes | |
| Appendix B (a) (3) (B) | A list of all owners and operators of the proposed electric transmission facilities. | Subsection 1.6, p. 1-2 | Yes | |
| Appendix B (a) (3) (C) | A description of the legal relationship between the applicant and each of the persons or entities specified in (a)(3)(A) and (B). | Subsection 1.6, p. 1-2 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date:

September 2024

June 2025

Technical Area: Land Use
Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project
Docket: 24-OPT-03

Technical Staff: Negar Vahidi, Tatiana Inouye
Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|---|--|--------------------------|---|
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A) | Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. | Subsections 3.3.3 to 3.3.4, pp. 3-1 to 3-2; Subsections 3.11.3 to 3.11.5, pp. 3.11-9 to 3.11-11; Subsections 3.16.3 to 3.16.5, pp. 3.16-9 to 3.16-11 | Yes | |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B) | Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and | Subsections 3.11.3 to 3.11.5, pp. 3.11-9 to 3.11-11; Subsections 3.16.3 to 3.16.5, pp. 3.16-9 to 3.16-11 | Yes | |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C) | A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference; | Subsection 3.11.6, pp. 3.11-11 to 3.11-12; Subsection 3.16.6, pp. 3.16-12 to 3.16-13 | Yes | |
| Appendix B (g) (1) | ...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference | Section 3.4, pp. 3-3 to 3-7; Subsection 3.11.1.1, p. 3.11-3; Appendix W (TN 259697); CEC Data Request Response Set #1 (TN 259876) | No Yes | See DR LAND-1 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. **01** Date:

~~September 2024~~

June 2025

Technical Area: **Land Use**

Project: Soda Mountain Solar Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------------|---|--|--------------------------|---|
| | materials used such as general plan or other adopted local, regional, or statewide plan. | | | |
| Appendix B (g) (3) (A) | A discussion of existing land uses, general plan land use designations, and current zoning districts (including any overlay districts) at the site, land uses and land use patterns within one mile of the proposed site and within one-quarter mile of any project-related linear facilities. Include: | Subsection 3.2.2, p. 3.2-6; Subsection 3.11.2, p. 3.11-6; Subsection 3.16.2, pp. 3.16-4 to 3.16-9 | Yes | |
| Appendix B (g) (3) (A) (i) | An identification of residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses; | Subsection 3.2.2, p. 3.2-6; Subsection 3.11.2, p. 3.11-6; Subsection 3.16.2, pp. 3.16-4 to 3.16-9 | Yes | |
| Appendix B (g) (3) (A) (ii) | A discussion of any recent or proposed zone changes and/or general plan amendments; noticed by an elected or appointed board, commission, or similar entity at the state or local level; | Subsection 3.11.2.5, p. 3.11-9 | Yes | |
| Appendix B (g) (3) (A) (iii) | Identification of all discretionary reviews by public agencies initiated or completed within 18 months prior to filing the application for those changes or developments identified in subsection (g)(3)(A)(ii); and | Subsection 3.11.2.5, p. 3.11-9 | Yes | |
| Appendix B (g) (3) (A) (iv) | Legible maps of the areas identified in subsection (g)(3)(A) potentially affected by the project, on which existing land uses, jurisdictional boundaries, general plan | Section 2.3, Figure 2-3, p. 2-5; Section 3.11, Figure 3.11-1, p. 3.11-8; Revised Section 3.11, Figure 3.11- | No Yes | See DR LAND-2 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. **01** Date:

~~September 2024~~

June 2025

Technical Area: **Land Use**
Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project
Docket: 24-OPT-03

Technical Staff: Negar Vahidi, Tatiana Inouye
Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------|--|---|--------------------|---|
| | designations, specific plan designations, and zoning have been clearly delineated. | <u>1 (TN 259699); CEC Data Request Response Set #1 (TN 259876)</u> | | |
| Appendix B (g) (3) (B) | A discussion of the compatibility of the proposed project with present and expected land uses, and conformity with any long-range land use plans and policies adopted by any federal, state, regional, or local planning agencies. The discussion shall identify the need, if any, for land use decisions by another public agency or as part of the commission's decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport Land Use Plan consistency determinations. | Subsection 3.11.1, pp. 3.11-1 to 3.11-5; <u>Appendix X (TN 259696); CEC Data Request Response Set #1 (TN 259876)</u> | No | See DR LAND-3 and DR LAND-4 <u>See REV 1 DR LAND-1</u> |
| Appendix B (g) (3) (C) | A discussion of the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, describe the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears and | Section 2.3, Figure 2-3, p. 2-1 and p. 2-5 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Revision No. 01 Date: September 2024

~~September 2024~~

June 2025

Technical Area: Land Use
Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project
Docket: 24-OPT-03

Technical Staff: Negar Vahidi, Tatiana Inouye
Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------------|--|--|--------------------|---|
| | temporary laydown or staging area, will be located on a single legal parcel. The merger need not occur prior to a decision on the Application but must be completed prior to the start of construction. | | | |
| Appendix B (g) (3) (D) | A map at a scale of 1:24,000 and written description of agricultural land uses found within all areas affected by the proposed project. The description shall include: | Subsection 3.2.2, p. 3.2-6 | Yes | |
| Appendix B (g) (3) (D) (i) | Land classifications as shown on the California Department of Conservation's Farmland Mapping and Monitoring Program's Important Farmland maps, crop types, irrigation systems, and any special cultivation practices; | Subsection 3.2.2, p. 3.2-6 | Yes | |
| Appendix B (g) (3) (D) (ii) | Whether agricultural land affected by the project was historically classified Farmland as defined by the California Department of Conservation (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland) as specified in Public Resources Code section 21060.1; and | Subsection 3.2.2, p. 3.2-6 | Yes | |
| Appendix B (g) (3) (D) (iii) | Direct, indirect, and cumulative effects on agricultural land uses. If the proposed site or related facilities are subject to an Agricultural Land Conservation contract, provide a written copy and a discussion of the status of the expiration or canceling of such contract. | Subsections 3.2.3 to 3.2.4, pp. 3.2-6 to 3.2-8 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. **01** Date:

~~September 2024~~

June 2025

Technical Area: **Land Use**
Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project
Docket: 24-OPT-03

Technical Staff: Negar Vahidi, Tatiana Inouye
Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---------------------------|---|---|---------------------------------|--|
| Appendix B (i) (1) (A) | Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and | Subsections 3.11.1 and 3.11.2, pp. 3.11-1 to 3.11-5; Subsection 3.16.1, pp. 3.16-1 to 3.16-3; Appendix V, Table 2-2, pp. 6 to 7; <u>Appendix X (TN 259696); CEC Data Request Response Set #1 (TN 259876)</u> | No | See LAND-3 and DR LAND-4 <u>See REV 1 DR LAND-1</u> |
| Appendix B (i) (1) (B) | Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities. | Appendix V, Table 2-1, pp. 3 to 6 | Yes | |
| Appendix B (i) (2) | The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff. | Appendix V, Table 2-1, pp. 3 to 6 | Yes | |
| Appendix B (i) (3) | A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has | Appendix V, Table 2-1, pp. 3 to 6; <u>CEC Data Request</u> | No <u>Yes</u> | See DR LAND-5 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. **01** Date:

~~September 2024~~

June 2025

Technical Area: **Land Use**
Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project
Docket: 24-OPT-03

Technical Staff: Negar Vahidi, Tatiana Inouye
Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-------------------------------|--|---|-------------------------------|--|
| | taken or plans to take to obtain such permits. | <u>Response Set #1 (TN 259876)</u> | | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. **01** Date: September 2024
June 2025

Technical Area: **Public Health**

Project: Soda Mountain Solar Project

Technical Staff: Yifan Ding/Jacquelyn Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes
Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|--|---|----------------------|---|
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A) | Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. | <u>Section 3-21 (TN #: 259710), Subsection 3.21.3.2, pp. 3.21-12 to 3.21-13</u> | No <u>Yes</u> | See DR PH-1 |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B) | Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and | <u>Section 3-21 (TN #: 259710), Subsection 3.21.3.2, pp. 3.21-12 to 3.21-13</u> | No <u>Yes</u> | See DR PH-2 |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C) | A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference; | <u>Section 3-21 (TN #: 259710), Subsection 3.21.8, pp. 3.21-18 to 3.21-19</u> | No <u>Yes</u> | See DR PH-3 |
| Appendix B (g) (1) | ...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or | Section 3.3, Subsection 3.3.5, pp. 3.3-34 to 3.3-35 <u>Section 3-21 (TN #: 259710), Subsection 3.21.3.4, pp. 3.21-14 to 3.21-16</u> | No | See DR PH-6 <u>REV 1 DR PH-1 to REV 1 DR PH-4</u> |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete X

Revision No. 01 Date: September 2024
June 2025

Technical Area: Public Health

Project: Soda Mountain Solar Project

Technical Staff: Yifan Ding/Jacquelyn Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes
Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------|--|--|----------------------|--|
| | other adopted local, regional, or statewide plan. | | | |
| Appendix B (g) (9) (A) | An assessment of the potential risk to human health from the project's hazardous air emissions using the Air Resources Board Hotspots Analysis and Reporting Program (HARP) (Health and Safety Code §§44360-44366) or its successor and Approved Risk Assessment Health Values. These values should include the cancer potency values and noncancer reference exposure levels approved by the Office of Environmental Health Hazard Assessment (OEHHA Guidelines, Cal-EPA 2005). | Appendix B (from Appendix C), Table 2, p. 138 <u>Section 3-21 (TN #: 259710), Subsection 3.21.3.4, pp. 3.21-14 to 3.21-16</u> | No | See DR PH-7 <u>See REV 1 DR AQ-2, REV 1 DR PH-3, and REV 1 DR PH-4</u> |
| Appendix B (g) (9) (B) | A listing of the input data and output results, in both electronic and print formats, used to prepare the HARP health risk assessment. | Appendix B (from Appendix C), Attachment D, pp. 166 to 173 <u>Data Request Response Set #1 (TN #: 259876), Attachment D, pp. 46 to 48 out of 153</u> | No | See DR PH-8 <u>See REV 1 DR PH-1 to REV 1 DR PH-4</u> |
| Appendix B (g) (9) (C) | Identification of available health studies through the local public health department concerning the potentially affected population(s) within a six-mile radius of the proposed power plant site related to respiratory illnesses, cancers or related diseases. | <u>Section 3-21 (TN #: 259710), Subsection 3.21.2.3, pp. 3.21-11 to 3.21-12</u> | No <u>Yes</u> | See DR PH-5 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete X

Revision No. 01 Date: September 2024
June 2025

Technical Area: Public Health

Project: Soda Mountain Solar Project

Technical Staff: Yifan Ding/Jacquelyn Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes
Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------------|---|--|--------------------|---|
| Appendix B (g) (9) (D) | A map showing sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A). | <u>Section 3-21 (TN #: 259710), Subsection 3.21.2.1, Figure 3.21-1, p. 3.21-9</u> | No <u>Yes</u> | See DR-PH-4 |
| Appendix B (g) (9) (E) | For this section, the following definitions apply: | -- | -- | -- |
| Appendix B (g) (9) (E) (i) | A sensitive receptor refers to infants and children, the elderly, and the chronically ill, and any other member of the general population who is more susceptible to the effects of the exposure than the population at large; | <u>Section 3-21 (TN #: 259710), Subsection 3.21.2.1, p. 3.21-8</u> | No <u>Yes</u> | See DR-PH-4 |
| Appendix B (g) (9) (E) (ii) | An acute exposure is one that occurs over a time period of less than or equal to one (1) hour; and | <u>Section 3-21 (TN #: 259710), Subsection 3.21.3.2, pp. 3.21-12 to 3.21-13</u> | No <u>Yes</u> | See DR-PH-7 |
| Appendix B (g) (9) (E) (iii) | A chronic exposure is one that is greater than twelve (12) percent of a lifetime of seventy (70) years. | <u>Section 3-21 (TN #: 259710), Subsection 3.21.3.4, pp. 3.21-14 to 3.21-16</u> | No <u>Yes</u> | See DR-PH-7 |
| Appendix B (i) (1) (A) | Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein | Appendix B (from Appendix C), Table 2, p. 138 <u>Section 3-21 (TN #: 259710), Subsection 3.21.6, Table 3.21-3, pp. 3.21-17 to 3.21-18</u> | No <u>Yes</u> | See DR-PH-9 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ____ Incomplete **X**

Revision No. **01** Date: September 2024
June 2025

Technical Area: **Public Health**

Project: Soda Mountain Solar Project

Technical Staff: Yifan Ding/Jacquelyn Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes
Wenjun Qian

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------|---|---|--------------------|---|
| | conformance, with each law or standard during both construction and operation of the facility is discussed; and | | | |
| Appendix B (i) (1) (B) | Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities. | Section 3-21 (TN #: 259710), Subsection 3.21.7, Table 3.21-4, p. 3.21-18 | No Yes | See DR PH-10 |
| Appendix B (i) (2) | The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff. | Appendix V, Table 2-1, p. 5 | Yes | |
| Appendix B (i) (3) | A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits. | Appendix V, Table 2-1, p. 5 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **X**

Revision No. **01** Date: ~~September 2024~~
June 2025

Technical Area: **Traffic and Transportation**

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|--|---|---------------------------|--|
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A) | Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. | Section 3.17, pp 3.17-13 to 3.17-22; Appendix M | Yes | |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B) | Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and | Appendix M | Yes | |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C) | A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference; | Section 3.17, p 3.17-23 | Yes | |
| Appendix B (g) (1) | ...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or | Section 3.17, pp. 3.17-13 to 3.17-22 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete X

Revision No. 01 Date: September 2024

September 2024

June 2025

Technical Area: **Traffic and Transportation**

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|----------------------------|--|--|--------------------------|---|
| | other adopted local, regional, or statewide plan. | | | |
| Appendix B (g) (5) (A) | A regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities. Include a reference to the transportation element of any applicable local or regional plan. | Section 3.17, p 3.17-11 | No Yes | See DR-TRANS-1 |
| Appendix B (g) (5) (B) | If the proposed project including any linear facility is to be located within four miles of an airport, a planned or proposed airport runway, or an airport runway under construction, discuss the project's compliance with the applicable sections of the current Federal Aviation Regulation Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace, specifically any potential to obstruct or impede air navigation generated by the project during construction or operation; such as, a thermal plume, a visible water vapor plume, glare, electrical interference, or surface structure height. The discussion should include: | Section 3.17, p 3.17-10 | Yes | |
| Appendix B (g) (5) (B) (i) | A map at a scale of 1:24,000 that displays the airport or airstrip runway configuration, the airport influence area including all safety zones, and the proposed power plant site and related facilities. | Section 3.17, p 3.17-10 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **X**

Revision No. **01** Date: **September 2024**

Technical Area: **Traffic and Transportation**

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------------|---|---|---------------------------------|---|
| Appendix B (g) (5) (B) (ii) | A thermal plume analysis that describes the plume's velocity; | N/A | N/A | N/A |
| Appendix B (g) (5) (B) (iii) | A discussion of the project's conformance with applicable Airport Land Use Compatibility Plan policies; and | N/A | N/A | N/A |
| Appendix B (g) (5) (B) (iv) | Copies of FAA Form 7460-1, Notice of Proposed Construction or Alteration, that were submitted or approved for any project component requiring notice. | N/A | N/A | N/A |
| Appendix B (g) (5) (C) | An evaluation of the project's potential impacts related to vehicle miles traveled (VMT) that may include: | Section 3.17, pp 3.17-18 to 3.17-19; Appendix M <u>Appendix M</u> <u>Transportation Analysis -</u> <u>October 2024 - Revision 1,</u> <u>pp 21 to 22</u> | No <u>Yes</u> | See DR-TRANS-2 |
| Appendix B (g) (5) (C) (i) | The local jurisdiction's thresholds of significance; | Section 3.17, pp 3.17-18 to 3.17-19 | Yes | |
| Appendix B (g) (5) (C) (ii) | Methodologies (such as local VMT Evaluation Tool); | Section 3.17, pp 3.17-18 to 3.17-19 | Yes | |
| Appendix B (g) (5) (C) (iii) | VMT heat maps; and | N/A | N/A | N/A |
| Appendix B (g) (5) (C) (iv) | Transportation demand management plans and any documents supporting the project applicant's CEQA determination. | Section 3.17, pp. 3.17-13 to 3.17.22 | Yes | |
| Appendix B (g) (5) (D) | An identification, on topographic maps at a scale of 1:24,000, and a description of existing and planned roads, rail lines, (including light rail), bike trails, airports, bus routes serving the project vicinity, pipelines, and canals in the project area | Section 3.17, p 3.17-11; Appendix A (from Appendix M) | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **X**

Revision No. **01** Date: **September 2024**

Technical Area: **Traffic and Transportation**

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------------|---|--|---------------------------------|---|
| | affected by or serving the proposed facility. For each road identified, include the following, where applicable: | | | |
| Appendix B (g) (5) (D) (i) | Road classification and design capacity; | Section 3.17, p. 3.17-12 | Yes | |
| Appendix B (g) (5) (D) (ii) | Current daily average and peak traffic counts; | Appendix M <u>Appendix M, pp 13 to 18, Appendix C (in Appendix M) and Appendix D (in Appendix M)</u> | No <u>Yes</u> | See DR TRANS-3 |
| Appendix B (g) (5) (D) (iii) | Current and projected levels of service before project development, during construction, and during project operation; | Section 3.17, p 3.17-12 <u>Appendix M, pp 15 to 18</u> | No <u>Yes</u> | See DR TRANS-4 |
| Appendix B (g) (5) (D) (iv) | Weight and load limitations; | Section 3.17, p 3.17-12 | Yes | |
| Appendix B (g) (5) (D) (v) | Estimated percentage of current traffic flows for passenger vehicles and trucks; and | <u>Appendix M, p. 13</u> | No <u>Yes</u> | See DR TRANS-5 |
| Appendix B (g) (5) (D) (vi) | An identification of any road features affecting public safety. | <u>Appendix M, pp. 18 to 19</u> | No <u>Yes</u> | See DR TRANS-6 |
| Appendix B (g) (5) (E) | An assessment of the construction and operation impacts of the proposed project on the transportation facilities identified in (g)(5)(D). Also include anticipated project specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(D). Include: | <u>Section 3.3, pp. 3.3-26 to 3.3-27, Section 3.1, pp. 3.1-31 to 3.1-34, Appendix E (in Appendix B)</u> | No | See DR TRANS-7 and DR TRANS-8 <u>See REV 1 DR TRANS-1</u> |

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **X**

Revision No. 01 Date: September 2024

Technical Area: **Traffic and Transportation**

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-----------------------------|---|--|----------------------|---|
| Appendix B (g) (5) (E) (i) | Estimated one-way trip lengths for workers, deliveries, and truck haul trips generated by the construction of the project. | <u>Section 3.17, p. 3.17-15</u> | No <u>Yes</u> | See DR-TRANS-9 |
| Appendix B (g) (5) (E) (ii) | Description of public roadways and intersections temporarily or permanently altered by construction and operation including the duration of activities. | <u>Section 3.16, pp. 3.16-10 to 3.16-11</u> | No <u>Yes</u> | See DR-TRANS-10 |
| Appendix B (g) (5) (F) | A discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport. | Section 3.17, pp 3.9-22 to 3.9-24 | Yes | |
| Appendix B (i) (1) (A) | Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and | Section 3.17, pp 3.17-1 to 3.17-10, <u>p. 3.17-23</u> | No <u>Yes</u> | See DR-TRANS-11 |
| Appendix B (i) (1) (B) | Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce | Appendix V, Table 2-1 | Yes | |

DATA COMPLETENESS WORKSHEET

Completeness: Complete _____ Incomplete **X**

Revision No. **01** Date: ~~September 2024~~

June 2025

Technical Area: **Traffic and Transportation**

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|--------------------|---|--|---------------------------------|---|
| | identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities. | | | |
| Appendix B (i) (2) | The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff. | Appendix V, Table 2-1 | Yes | |
| Appendix B (i) (3) | A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits. | <u>Section 3.17, pp. 3.17-23 to 3.17-24</u> | No <u>Yes</u> | See DR TRANS-12 |

Completeness: Complete ___ Incomplete X **DATA COMPLETENESS WORKSHEET**
 Technical Area: Visual Resources Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: June 2025
 Technical Senior: Michael Clayton
Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|---|--|---------------------------|--|
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A) | Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. | Subsection 3.1.2.4 5 , pp. 3.1-14 5 to 3.1-24 2 ; Subsection 3.1.3.1, p. 3.1-22 3 ; Subsection 3.1.3.2, pp. 3.1.22 3 to 3.1.28 9 ; Subsection 3.1.3.3, pp. 3.1.28 9 to 3.1-34; Appendix B, Section 4.1, pp. 16 20 -17 21 ; Section 5, pp. 28 30 -33 6 ; Section 6, pp. 3.1-33 6 to 3.1-34 7 | Yes | |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B) | Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and | Subsection 3.1.2.4 5 , pp. 3.1-14 5 to 3.1-24 2 ; Subsection 3.1.3.1, p. 3.1-22 3 ; Subsection 3.1.3.2, pp. 3.1.22 3 to 3.1.28 9 ; Subsection 3.1.3.3, pp. 3.1.28 9 to 3.1-34. Appendix B, Section 4.1, pp. 16 20 to 17 21 , Section 5, pp. 28 30 to -33 6 , Section 6, pp. 33 6 to 34 7 | Yes | |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C) | A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference; | Subsection 3.1.4 6 , pp. 3.1-35 7 to 3.1-36 8 | Yes | |
| Appendix B (g) (1) | ... provide a discussion of the existing site conditions, the expected direct, indirect, and | Subsection 3.1, pp 3.1-1 to 3.1-36 8 . Appendix B, Sections 1 to 7 8 , | No | See DR-VIS-1 <u>See REV 1 DR VIS-2</u> |

Completeness: Complete ☐ Incomplete ☒ **DATA COMPLETENESS WORKSHEET**
 Technical Area: **Visual Resources** Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: Michael Clayton
 Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|----------------------------|---|--|--------------------|---|
| | cumulative impacts due to the construction, operation, and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection (or a combination of) used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan. | Appendices A to EG (from Appendix B), pp. 1 to 121- 90 | | |
| Appendix B (g) (6) (A) | Provide a description of the existing landscape (built or natural) where the proposed project is to be sited and the vicinity, and along the proposed routes for any aboveground project-related linear facilities. Include: | Subsection 3.1.2, pp. 3.1-10 to 3.1-12 3 | Yes | |
| Appendix B (g) (6) (A) (i) | Show on a map(s) (pinpoint) any designated or recognized scenic vista and scenic resource within a five-mile radius of the project and one-mile radius of a project-related linear facility. Include: | Subsection 3.1.2.2, Figure 3.1-1, p. 3.1-12 3 | Yes | |

Completeness: Complete ☐ Incomplete ☒ **DATA COMPLETENESS WORKSHEET**
 Technical Area: **Visual Resources** Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: Michael Clayton
 Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-------------------------------|--|--|--------------------|---|
| Appendix B (g) (6) (A) (i) a. | Any designated scenic vista and scenic resource in an adopted federal, state, county, or city government planning document, plan, or regulation. | Subsection 3.1.2.2, Figure 3.1-1, p. 3.1-12 3 ; Subsection 3.1.3.3, pp. 3.1-28 9 to 3.1-29 30 | Yes | |
| Appendix B (g) (6) (A) (i) b. | A natural feature or object that is a part of the land, such as a geologic distinguishing characteristic (e.g., laccolith), geomorphologic feature (e.g., gorge), or other terrain feature (e.g., a water body, open space, or a tree recognized for its aesthetic, botanical and ecological value, or age, rarity, and size). | Subsection 3.1.2.2, pp. 3.1-10 1 to 3.1-12 | No <u>Yes</u> | See DR-VIS-2 |
| Appendix B (g) (6) (A) (i) c. | A man-made feature or object that embodies elements of architecture or engineering design, detail, materials or craftsmanship that represent a significant innovation or is unique, such as the California State Capitol, Golden Gate Bridge, or Hollywood Sign. | Subsection 3.1.2.2, pp. 3.1-10 1 to 3.1-12 | Yes | |
| Appendix B (g) (6) (A) (i) d. | Explain does the project eliminate or obstruct the public view (the visible area from a location where the public has a legal and physical right of access to real property) of a scenic vista and | Subsection 3.1.3.3, p. 3.1-31 1 ; Subsection 3.1.3.3, pp. 3.1-29 30 to 3.1-31 2 | No <u>Yes</u> | See DR-VIS-1 |

Completeness: Complete ☐ Incomplete ☒ **DATA COMPLETENESS WORKSHEET**
 Technical Area: **Visual Resources** Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: June 2025
 Technical Senior: Michael Clayton
 Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-----------------------------|--|--|--------------------|---|
| | scenic resource? Is the project situated so that it changes the visual aspect of a scenic resource by being different or in sharp contrast? | | | |
| Appendix B (g) (6) (A) (ii) | Describe the existing nighttime lighting on the project site and in the vicinity. | Subsection 3.1.3.3, pp. 3.1-28 32 to 3.1-29 33 ; Appendix BD , Appendix A (from Appendix B), p. 7 | Yes | |
| Appendix B (g) (6) (B) | In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within an "urbanized area" as defined in Public Resources Code section 21071, explain the project's conformance with the city/county General Plan, and city municipal code or county government code (e.g., zoning) governing scenic quality. | N/A | N/A | N/A |
| Appendix B (g) (6) (C) | In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within a non-urbanized area provide the following: | -- | -- | -- |

Completeness: Complete ☐ Incomplete ☒ **DATA COMPLETENESS WORKSHEET**
 Technical Area: **Visual Resources** Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: June 2025
 Michael Clayton
 Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------------|--|---|--------------------|---|
| Appendix B (g) (6) (C) (i) | Show on a map the pinpoint location of the key observation point(s) (KOP) for the project. A KOP is a fixed position in a publicly accessible location where a public view of the project is analyzed and/or evaluated in the landscape. Objects of aesthetic significance are the primary focus in the KOP selection. | Subsection 3.1.2.4 5 , Figures 3.1-3 and 3.1-4, pp. 3.1-18 to 3.1-19 | No <u>Yes</u> | See DR-VIS-1 |
| Appendix B (g) (6) (C) (ii) | If an object of aesthetic significance is not in the vicinity of the project, a KOP is to be selected based on importance to stakeholders, visibility, direct public selection, worst-case scenario, or other reason. Explain the reason the KOP was chosen. At a minimum two KOPs are to be selected. | Subsection 3.1.2.4, pp. 3.1-14 5 to 3.1-21 2 ; Appendix B A , Appendix C (from Appendix B) | No <u>Yes</u> | See DR-VIS-1 |
| Appendix B (g) (6) (C) (iii) | Provide a color photograph(s) showing an actual line of sight at eye level during daytime and clear weather from the KOP to the project site prior to any alteration (existing condition). The photographer at the KOP is to use a standard lens. For each photograph provide the following information: camera type, lens focal length, viewing angle; date | Appendix B E , Appendix D (from Appendix B) | No <u>Yes</u> | See DR-VIS-1 |

Completeness: Complete ☐ Incomplete ☒ **DATA COMPLETENESS WORKSHEET**
 Technical Area: Visual Resources Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: Michael Clayton
 Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-----------------------------|---|--|----------------------|---|
| | and time the photograph was taken, and the distance to the project site. | | | |
| Appendix B (g) (6) (C) (iv) | Using the photograph from the KOP provide a spatially accurate and realistically photo manipulated computer simulated image of the project (photo-realistic simulation) one-year after completion of construction (existing condition plus proposed project). | Appendix B <u>F</u> , Appendix D (from Appendix B) | No | See DR-VIS-1 <u>See REV 1 DR VIS-2</u> |
| Appendix B (g) (6) (C) (v) | The KOP photograph and the photo-realistic simulation are to be capable of 11" x 17" color print by a printer capable at a minimum 600 dots per inch output resolution. | Kiteworks <u>Appendix F (from Appendix B)</u> | No | See DR-VIS-1 <u>See REV 1 DR VIS-2</u> |
| Appendix B (g) (6) (C) (vi) | Provide a copy of the KOP photograph(s) and photo-realistic simulation(s) in an electronic file. | Kiteworks <u>Appendix F (from Appendix B)</u> | No | See DR-VIS-1 <u>See REV 1 DR VIS-2</u> |
| Appendix B (g) (6) (D) | Show and describe the project in the landscape. | Subsection 3.1.3.3, pp. 3.1-29 to 3.1-34; 2 ; Appendix B, Section 5.1, Appendix D <u>F</u> (from Appendix B) | No | See DR-VIS-1 <u>See REV 1 DR VIS-2</u> |
| Appendix B (g) (6) (D) (i) | Provide an 8.5" x 11" sized scaled elevation(s) of project buildings, structures, and major equipment; a table listing their dimensions (height, length, width, diameter). | Appendix B, Subsection 2.2, pp. 2 to 5 <u>8</u> , Appendix D <u>C</u> (from Appendix B) | No <u>Yes</u> | See DR-VIS-3 |

Completeness: Complete ☐ Incomplete ☒ **DATA COMPLETENESS WORKSHEET**
 Technical Area: **Visual Resources** Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: June 2025
 Technical Senior: Michael Clayton
 Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|--------------------------------|--|---|--------------------|---|
| Appendix B (g) (6) (D) (ii) | Provide a table and description of the exterior surface treatments and finishes for the buildings, structures, major equipment (e.g., colors, flat and/or textured finishes), and structural materials. | Subsection 3.1.3.2, pp. 3.1-234 to 3.1-245; Appendix B, Subsection 2.2, p. 8 | No Yes | See DR-VIS-4 |
| Appendix B (g) (6) (D) (iii) | Describe project specific architectural treatment or design technique mitigation unique to the project's siting at the location (e.g., camouflage, disguise, screen), if any. | Subsection 3.1.3.2, pp. 3.1-23 to 3.1-24; Appendix B , Appendix B (from Appendix B) | Yes | |
| Appendix B (g) (6) (D) (iv) | Provide a project specific conceptual landscape design plan that conforms with the city municipal code or county government code. Include: | Subsection 3.1.5, p. 3.1-37; Appendix B, Subsection 2.2.11, p. 6; Appendix B , Appendix B (from Appendix B) | No Yes | See DR-VIS-5 |
| Appendix B (g) (6) (D) (iv) a. | the type of plant and/or tree species, location, quantity, size, spacing at installation/planting, expected growth rates, and expected heights at one-year, five years, and maturity. Specify irrigation system components and show their locations. | Appendix B , Appendix B (from Appendix B) | No Yes | See DR-VIS-5 |
| Appendix B (g) (6) (D) (iv) b. | the calculated total pervious surface amount for the project site; include the surface to be replaced, the new surface, and the total area to be landscaped. | Appendix B , Appendix B (from Appendix B) | Yes | |

Completeness: Complete ☐ Incomplete ☒ **DATA COMPLETENESS WORKSHEET**
 Technical Area: **Visual Resources** Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: Michael Clayton
 Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-------------------------------|--|--|--------------------|---|
| Appendix B (g) (6) (D) (v) | Provide a project specific conceptual outdoor lighting control and management plan (lighting plan) and explain the control of reflectance from exterior surfaces offsite that conform with the city municipal code or county government code. | Subsection 3.1.3.2, pp. 3.1-24 to 3.1-25, and 3.1-28 to 3.1-29 , Subsection 3.1.3.3, pp. 3.1-31 2 to 3.1-32 4 ; Appendix B, Subsection 2.2.7, pp. 64 to 57 ; Appendix AD (from Appendix B), pp. 1 to 16 | No Yes | See DR-VIS-6 |
| Appendix B (g) (6) (D) (v) a. | Provide a list of the project-specific luminaires, identify the design (e.g., full cutoff, semi cutoff, non cutoff) and indicate if the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Show the project-specific luminaires locations on a diagram or elevation. | Subsection 3.1.3.2, pp. 3.1-24 5 to 3.1-25 6 , Subsection 3.1.3.3, pp. 3.1-31 2 to 3.1-32 3 ; Appendix B, Subsection 2.2.7 8 , pp. 64 to 57 ; Appendix AD (from Appendix B), pp. 1 to 16 | No Yes | See DR-VIS-7 |
| Appendix B (g) (6) (D) (v) b. | Describe reflectance, the intensity of the specular reflectance from the exterior surface of the project's large buildings, structures, and major equipment offsite to the surrounding area (e.g., the light reflected from the shiny surface). The reflectance of the object-how bright it shines-depends on the intensity of the | Subsection 3.1.3.2, pp. 3.1-24 to 3.1-257 ; Subsection 3.1.3.3, pp. 3.1-31 3 to 3.1-32 4 ; Appendix B, Subsection 2.2.7 4.1.5 , pp. 214 to 57 ; Appendix B, Subsection 6, pp. 36 to 37 ; Appendix AG (from Appendix B), pp. 1 to 16 , Appendix E (from Appendix B), pp. 1 to 20 | No | See DR-VIS-8 See REV 1 DR VIS-1 |

Completeness: Complete ☐ Incomplete ☒ **DATA COMPLETENESS WORKSHEET**
 Technical Area: **Visual Resources** Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: Michael Clayton
 Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------------|---|---|---------------------------|--|
| | light striking it and the materials from which it is made (e.g., glass, reinforced concrete, structural steel). | | | |
| Appendix B (g) (6) (E) | If the project is to use a cooling tower emitting a publicly visible water vapor plume (visible plume) in the atmosphere provide the following information: | N/A | N/A | N/A |
| Appendix B (g) (6) (E) (i) | Provide the cooling tower's number of fan cells, the fan cell stack height and diameter, the exhaust mass flow rate, heat rejection rate, and exhaust temperature. | N/A | N/A | N/A |
| Appendix B (g) (6) (E) (ii) | Provide fogging curves specific to the cooling tower's exhaust discharge for at least three ambient air temperature conditions (a low, average, and high temperature condition). | N/A | N/A | N/A |
| Appendix B (g) (6) (E) (iii) | Explain if the project's forecasted visible plume emitted in the atmosphere by the cooling tower would eliminate or obstruct an existing public view of a designated or recognized scenic vista, scenic resource, and the existing visual character or quality of | N/A | N/A | N/A |

Completeness: Complete ☐ Incomplete ☒ **DATA COMPLETENESS WORKSHEET**
 Technical Area: **Visual Resources** Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: June 2025
 Technical Senior: Michael Clayton
 Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---------------------------|---|---|-------------------------|---|
| | public views of the site and its surroundings. | | | |
| Appendix B (i) (1) (A) | Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and | Subsection 3.1.1, pp. 3.1-1 to 3.1-10; <u>Subsection 3.1.4, pp. 3.1-36 to 3.1-37</u> | No | See DR-VIS-9 <u>See REV 1 DR VIS-3</u> |
| Appendix B (i) (1) (B) | Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities. | Appendix V, Section 2.0, Table 2-1, pp. 2-6 <u>Subsection 3.1.5, p. 3.1-37</u> | No <u>Yes</u> | See DR-VIS-10 |
| Appendix B (i) (2) | The name, title, phone number, address (required), and email | Appendix V, Section 2.0, Table 2-1, pp. 2-6 | No <u>Yes</u> | See DR-VIS-11 |

Completeness: Complete ☐ Incomplete ☒ **DATA COMPLETENESS WORKSHEET**
 Technical Area: Visual Resources Project: Soda Mountain Solar Project
 Project Manager: Lisa Worrall Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: Michael Clayton
 Technical Senior: Steven Kerr

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---------------------------|---|---|------------------------------------|--|
| | address (if known), of an official who was contacted within each agency, and also provide the name of the official who will serve as a contact person for Commission staff. | <u>Subsection 3.1.5, p. 3.1-37</u> | | |
| Appendix B (i) (3) | A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits. | Appendix V, Section 2.0, Table 2-1, pp. 2-6 <u>Subsection 3.1.5, p. 3.1-37</u> | No <u>Yes</u> | See DR-VIS-12 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Worker Safety**
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project
 Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: Paul Miller, Daniel Jones
 Technical Senior: Brett Fooks

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---|---|--|----------------------|---|
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A) | Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document. | Appendix Q, Subsection 1.2, pp. 1 to 17 | Yes | |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B) | Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and | N/A | N/A | N/A |
| Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C) | A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference. | Appendix Q, Subsection 1.6, pp. 34 to 36 | Yes | |
| Appendix B (g) (1) | ...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any | Appendix Q, Subsection 1.1 p. 1; Subsection 1.2 pp. 1 to 18 <u>Appendix Q (TN #: 257942) Section 1.1 to 1.2, pp. 1 to 21</u> | No <u>Yes</u> | See DR-WS-1 to DR-WS-3 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: **Worker Safety**
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project
 Docket: 24-OPT-03

September 2024
 Revision No. 01 Date: **June 2025**
 Technical Staff: Paul Miller, Daniel Jones
 Technical Senior: Brett Fooks

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|-------------------------|--|---|----------------------|---|
| | reference materials used such as general plan or other adopted local, regional, or statewide plan. | | | |
| Appendix B (g) (11) (A) | A description of the safety training programs that will be required for construction and operation personnel. | Appendix Q, Subsection 1.2.4.4, pp. 15 to 16, Tables C and D <u>Appendix Q (TN #:257942) Section 1.2.4.1.2, p. 9</u> | No <u>Yes</u> | See DR WS-1 |
| | A complete description of the fuel handling system and the fire suppression system. | Subsection 3.9.3.4, p. 3.9-25 and p. 3.9-27; Appendix Q, Subsection 1.2.4.5, pp. 16 to 18; <u>Appendix Q (TN #:257942) Section 1.2.4.1.2, pp. 18-21</u> | No | See DR WS-2 <u>See REV 1 DR WS-1 through REV 1 DR WS-4</u> |
| Appendix B (g) (11) (C) | Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows: | -- | -- | -- |
| | Construction Health and Safety Program: <ul style="list-style-type: none"> Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509); | Appendix Q, Subsection 1.2.4.1.1, pp. 7 to 8 | Yes | |
| | <ul style="list-style-type: none"> Fire Protection and Prevention Plan (8 Cal. Code Regs., section 1920); | Appendix Q, Subsection 1.2.4.1.2, pp. 8 to 9 <u>Appendix Q (TN #:257942) pp. 10 to 11</u> | No <u>Yes</u> | See DR WS-2 to DR WS-33 <u>See REV 1 DR WS-1, REV 1 DR WS-2, REV 1 DR WS-3</u> |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒

Technical Area: **Worker Safety**

Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project

Docket: 24-OPT-03

Revision No. 01 Date: September 2024
June 2025

Technical Staff: Paul Miller, Daniel Jones

Technical Senior: Brett Fooks

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|------------------------|---|--|--------------------------|--|
| | <ul style="list-style-type: none"> Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522) | Appendix Q, Subsection 1.2.4.1.3, pp. 9 to 10 | Yes | |
| | Operation Health and Safety Program: <ul style="list-style-type: none"> Injury and Illness Prevention Program (8 Cal. Code Regs., §3203); | Appendix Q, Subsection 1.2.4.2.1, pp. 10 to 12 | Yes | |
| | <ul style="list-style-type: none"> Fire Prevention Plan (8 Cal. Code Regs., § 3221); | Appendix Q, Subsection 1.2.4.2.2, pp. 12 to 13 Appendix Q (TN #:257942) pp. 13 to 14 | No | See DR-WS-2 to DR-WS-3 See REV 1 DR WS-1 through REV 1 DR WS-4 |
| | <ul style="list-style-type: none"> Emergency Action Plan (8 Cal. Code Regs., § 3220); | Appendix Q, Subsection 1.2.4.2.4, pp. 13 to 14 | Yes | |
| | <ul style="list-style-type: none"> Personal Protective Equipment Program (8 Cal. Code Regs., §§3401-3411). | Appendix Q, Subsection 1.2.4.2.3, p. 13 | Yes | |
| Appendix B (i) (1) (A) | Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and | Appendix Q, Subsection 1.3, Table E, pp. 19 to 28 Appendix Q (TN #:257942) Section 1.2.4.1.2, p. 9 | No Yes | See DR-WS-1 |

DATA COMPLETENESS WORKSHEET

Completeness: Complete ☐ Incomplete ☒
 Technical Area: Worker Safety
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project
 Docket: 24-OPT-03

Revision No. 01 Date: September 2024
 Technical Staff: Paul Miller, Daniel Jones
 Technical Senior: Brett Fooks

| SITING REGULATIONS | INFORMATION | APPLICATION SECTION NUMBER AND PAGE NUMBER | COMPLETE YES OR NO | INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS |
|---------------------------|---|---|--------------------|---|
| Appendix B (i) (1) (B) | Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities. | Appendix Q, Subsection 1.5, Table G, p. 33; Appendix V, Table 2-1, pp. 3 to 6 | Yes | |
| Appendix B (i) (2) | The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff. | Appendix Q, Subsection 1.4, Table F, p. 32; Appendix V, Table 2-1, pp. 3 to 6 <u>Appendix Q (TN #:257942) Section 1.4, Table F, p. 35</u> | No <u>Yes</u> | See DR-WS-4 |
| Appendix B (i) (3) | A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits. | Appendix Q, Subsection 1.5, Table G, p. 33; Appendix V, Table 2-1, pp. 3 to 6 | Yes | |

Attachment B

Revision 1 Data Requests

Attachment B Revision 1 Data Requests

AIR QUALITY/PUBLIC HEALTH/GREENHOUSE GAS EMISSIONS

The proposed changes described in the revised Project Description (TN 261595) are expected to increase construction-related emissions of criteria air pollutants, toxic air contaminants, and greenhouse gases. Key changes include the addition of a 1-mile 500-kV gen-tie line with tall towers and an underground segment beneath I-15, deeper and wider electrical connection trenches (up to 6 feet deep and 6 feet wide), expansion of the substation to 140,000 square feet with concrete foundations, and wider access roads up to 26 feet. These activities might involve more grading, excavation, and equipment use, resulting in increased emissions. Staff requests an updated construction emissions and impacts analysis to be consistent with the revised Project Description.

REV 1 DR AQ-1. Please provide an updated CalEEMod analysis reflecting construction emissions from the proposed project changes or provide a justification explaining why an updated analysis is not needed.

REV 1 DR AQ-2. Please provide an updated air dispersion modeling and health risk assessment reflecting construction emissions from the proposed project changes or provide a justification explaining why an updated analysis is not needed.

As mentioned in the Appendix Q Worker Safety (TN 259704), the battery energy storage system (BESS) units are fully certified to the most rigorous international safety standards including UL 9540A - Standard Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems. Response to DR HAZ-1 (TN 259876) only listed hazardous materials during construction and normal operation without showing toxic materials during BESS thermal runaway. To further assist the CEC staff and the public in their review of the air quality and public health impacts during the battery thermal runaway/fires, staff requests the following supplemental information:

REV 1 DR PH-1. Please provide a copy of the UL 9540A report, if a specific battery manufacturer has been chosen, including measured emissions of criteria air pollutants, toxic air contaminants, greenhouse gases (GHG), and hazardous materials. Otherwise, please provide industry average data or a literature review addressing the emissions and exhaust parameters requested in **REV 1 DR PH-2** below.

REV 1 DR PH-2. Please provide the exact locations (latitude and longitude or UTM coordinates) and dimensions of the BESS enclosures for modeling purposes. Please provide the following input parameters for a dispersion modeling analysis of all potential criteria air pollutants, greenhouse gases, and toxic air contaminants (TACs) that could be generated during combustion: emission rates (in grams/second),

exhaust temperature, exhaust diameter, pressure, and exhaust gas velocity resulting from battery damage or thermal runaway. Please include the calculation worksheet if available.

REV 1 DR PH-3. Please provide a dispersion modeling analysis of all potential criteria air pollutants and Toxic Air Contaminants (TACs) for the thermal runaway scenario using a well-validated model (AERMOD preferred).

REV 1 DR PH-4. Please compare the modeled fire-related TACs concentrations to the Office of Environmental Health Hazard Assessment (OEHHA) /California Air Resources Board (CARB) acute Reference Exposure Levels (RELs) and demonstrate whether the acute hazard Index (HI) of TACs would be higher than the significance threshold of 1 at sensitive receptors. If an OEHHA REL is not available, a level 1 U.S. EPA Acute Exposure Guideline Level (AEGL) shall be used as the threshold of significance. Please demonstrate whether the criteria air pollutant impacts would cause or contribute to any exceedance of ambient air quality standards. If exceedances occur, provide a detailed Emergency Response Plan and outline the applicable regulatory notification requirements.

Section 3-8 Greenhouse Gas Emissions, page 3.8-11 under BESS Efficiency, in response to **DR GHG-6**, the indirect emissions are estimated based on the 2022 emission intensity factors for electricity provided by LADWP and does not take into account reductions in emission intensity factors over the life of the project as additional renewable energy is added to LADWP's power mix. Natural gas power generation is projected to become less prominent in California's power mix as California's policies, most notably those enacted to reach the SB 100 (De León, Chapter 312, Statutes of 2018) goal of 100 percent renewable and zero-carbon electricity by 2045, decarbonize the electricity sector. Therefore, using a static displacement factor for a power type currently being phased out through state policy overestimates the project's avoided GHG emissions and an update to the avoided GHG emissions analysis is needed.

REV 1 DR GHG-1. Please conduct an updated analysis of the amount of GHG emissions that would be avoided by the proposed project, taking into account the declining statewide average emissions of California's power mix as the state reaches future SB 100 renewable and zero-carbon electricity goals.

Section 3-8 Greenhouse Gas Emissions has been updated and docketed in response to **DR GHG-7**. In Appendix C-1 Air Quality and Greenhouse Gas Technical Report (page 125 of 176 of the pdf file), the applicant proposes to use R-410A as the refrigerant for "other commercial A/C and heat pumps". However, the application does not demonstrate how the use of R-410A would comply with the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning and Other End-Uses (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10 on Climate Change, Article 4, Subarticle 5, Section 95374). Staff needs this analysis to demonstrate that the project would not conflict with regulations adopted

for the purpose of reducing the emissions of greenhouse gases. In addition, staff needs clarification on whether the BESS cooling system will use any refrigerant.

REV 1 DR GHG-2. Please confirm whether any refrigerant would be used for BESS cooling. If yes, please provide the specifications of the refrigerant to be used and provide GHG emissions calculation due to refrigerant leakage.

REV 1 DR GHG-3. Please demonstrate how the use of R-410A and any refrigerant proposed for BESS cooling would comply with the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning and Other End-Uses. If not, please propose an alternative refrigerant, and provide updated greenhouse gas emission estimates associated with the newly proposed refrigerant.

REV 1 DR GHG-4. Please explain how the proposed refrigerant(s) would comply with the sale and distribution prohibition timelines established in SB 1206 (Skinner, Chapter 884, Statutes of 2022) (Health and Safety Code, section 39735).

BIOLOGICAL RESOURCES

In response to staff's Data Request DR BIO-10, the applicant is proposing MM BIO-3, which use an alternative construction technology to reduce project impacts to jurisdictional features. The applicant states that if the proposed technology and MM BIO-3 is approved during the licensing process, then the applicant will enlist a 3rd party consultant to review and update the previously submitted jurisdictional delineation.

However, following the submittal of DR BIO-10, CEC staff conducted a site visit and identified drainages that were not included in the applicant's delineation. As a result, staff requests that the applicant complete a delineation of California Department of Fish and Wildlife (CDFW) and state jurisdictional waters to reflect conditions identified in the field by CEC staff prior to project approval. This delineation is necessary to determine the extent of potential impacts to jurisdictional waters.

Staff requires this information to evaluate potential temporary and/or permanent impacts to jurisdictional waters and to support required permitting consistent with Section 1600 et seq of the California Fish and Game Code, and to inform the development of permit conditions under the CEC's license.

REV 1 DR BIO-1. Staff requests confirmation that the revised delineation will be conducted as part of data completeness review. Please provide the expected completion date for the revised delineation. Once the revised delineation is complete, please submit the updated information to CEC staff for review.

In response to staff's Data Request DR BIO-12, the applicant states that BLM is currently reviewing the project under NEPA and will determine whether the Biological Opinion (BO) requires revision. Staff understands this process is ongoing and notes in

the BO for the proposed project that a travel route is located from Zzyzx Road via Arrowhead Trail to the LADWP transmission line right of way.

REV 1 DR BIO-2. Please confirm this travel route is proposed to be used for the project. The existing roads identified on Figure 2 do not clearly identify which roads would be used. Please provide a map that clearly defines which specific roads and or road sections that would be used to access the project and the proposed substation. Please provide biological and jurisdictional waters information that occur within a 50-foot buffer of any proposed access roads and describe any improvements that may need to occur, such as grading or repairs of drainages following large rain events.

In response to staff's Data Request DR-20, the applicant submitted Appendix AA (TN # 261667) which provides the applicant's determination of infeasibility for CEC Data Request BIO-20. The appendix includes the applicant's assessment of the feasibility of a 0.25-mile buffer from areas with 10% slope to address potential impacts to desert bighorn sheep (*Ovis canadensis nelsoni*). Staff reviewed the applicant's feasibility study and did not find compelling biological justification for a reduction of the 0.25-mile buffer from the 10% slope. As staff noted in DR-20, CDFW is recommending a 0.25-mile buffer from the 10% slope to reduce impacts to bighorn sheep to a less than significant level. This buffer was based on a study completed by Dudek for CDFW when they were acting as the lead agency under CEQA for the Soda Mountain project prior to the applicant pursuing the opt-in certification program. In addition, a recent study submitted by Dr. Aiello titled *Christina Aiello Comments - subtitle corrections to submitted documents under comment titled Impacts to Bighorn Sheep* (TN 262246) suggested a larger buffer between the facility and bighorn sheep habitat, ranging from 0.64 to 1.24 miles, would be appropriate to reduce negative impacts. Based on information provided in the various studies, bighorn sheep routinely use the area immediately abutting the eastern fence line.

REV 1 DR BIO-3. Please provide any compelling biological data demonstrating that a reduction of the 0.25-mile buffer from the 10% slope, would not result in adverse or significant impacts to desert bighorn sheep. The information should include the following, as available:

- Site-specific data or studies demonstrating desert bighorn sheep habitat use patterns in the vicinity of the project area, particularly near the eastern fence line;
- Scientific rationale or peer-reviewed evidence supporting any proposed buffer reduction from the 0.25-mile, 0.64 mile, and 1.24 mile buffer; and
- A discussion of how any proposed buffer or lack of buffer maintains consistency with CDFW recommendations and CEQA significance thresholds.

If no such data is available, please explain the rationale for proposing a smaller buffer or no buffer despite the absence of biological evidence.

EXECUTIVE SUMMARY

Staff reviewed the applicant's response to DR ES-1 in Exhibit 4, Figure 1-1 in CEC Data Response Set#1 (TN 259876). Figure 1-1 does not show the two fiber-optic cables and one fuel pipeline is shown, instead of two. Based on that review staff has a question for clarification.

REV 1 DR ES-1. Please update figure to include the missing linears. If the two fuel pipelines are co-located with each other, please indicate on the legend. Additionally, if the two fiber-optic cables follow the 500 kilovolt Mead-Adelanto transmission line, either co-located on the transmission towers or below grade within the right-of-way, please note that on the legend.

LAND USE

Staff explained in DR LAND-3 (TN 258896) that an Opt-In Application must include the following information for applicable federal plans and policies: (1) discussion of the proposed project's conformity with any long-range land use plans and policies adopted by any federal planning agencies; and (2) tables that identify laws, regulations, ordinances, standards, that include adopted federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each (per CEC Siting Regulations Appendix B, section (g)(3)(B) and section (i)(1)(A)).

There are two federal long-range land use plans and policies applicable to the project site for which the applicant has not provided the above required information. These plans and policies are the Desert Renewable Energy Conservation Plan (DRECP) Land Use Plan Amendment (LUPA), and the Designation of Energy Corridors on BLM-Administered Lands in 11 Western States (West-Wide Energy Corridor ROD).

- **DRECP LUPA.** In its initial application, the applicant stated that because the BLM Record of Decision (ROD) for the project pre-dates the adoption of the DRECP LUPA, the LUPA's Conservation and Management Actions (CMAs) would not apply to the project (see TN 257912, Section 2.3.1.2).

Staff responded to the application in DR LAND-3 (TN 258896) by explaining that the inclusion of the BESS component of the proposed project may trigger further environmental review under NEPA because it was not a project component included in the BLM ROD, and that any subsequent environmental review would be subject to the California Desert Conservation Area's (CDCA) amended policies and mitigation requirements (i.e., CMAs) that were adopted through the DRECP LUPA.

In their Data Request Response #1 (TN 259876), the applicant confirmed that it has submitted an amended SF-299 application (Application for Transportation, Utility Systems, Telecommunications and Facilities on Federal Lands and Property) and Plan of Development to BLM that outlines the addition of the BESS. The applicant

further states "...[c]onsultation with the BLM to add this component to the project and the extent to which further analysis of the BESS component will be required by BLM prior to issuing the [right-of-way] ROW Grant authorization remains ongoing." However, the applicant has not responded to staff's request in DR LAND-3 to provide a list of the applicable CMAs from the DRECP LUPA and justification of how the project would comply with the requirements of each CMA.

- **West-Wide Energy Corridor Record of Decision (ROD).** DR LAND-3 explains that the West-Wide Energy Corridor ROD includes Interagency Operating Procedures (IOPs) that are designed to avoid or minimize environmental impacts during the siting and construction of individual energy projects within a designated Section 368 energy corridor. In their initial application, the applicant acknowledges the West-Wide Energy Corridor ROD but does not discuss the project's conformity with the ROD's IOPs (see TN 257908, Section 3.11).

Staff responded to the application in DR LAND-3 (TN 258896) by explaining that a description of the applicable IOPs and an explanation of the project's conformity is necessary to support the discussion of the required conformance with applicable policies in the CEQA Land Use analysis. DR LAND-3 further explained that the BLM has proposed an amendment to the West-Wide Energy Corridor that includes adjustments to energy corridor designations and revisions to IOPs, which would affect energy corridors within the CDCA planning area wherein the proposed project is located. In DR LAND-3, staff requested that the applicant identify any new or revised IOPs from the Section 368 Energy Corridor Final Report that could be incorporated into the BLM's permit conditions for the project's ROW Grant authorization.

The applicant has not responded to staff's request in DR LAND-3 to identify and discuss the applicable IOPs and project compliance with each, and to identify any new/revised IOPs from the Section 368 Energy Corridor Final Report that could be incorporated into the BLM's permit conditions.

REV 1 DR LAND-1. Please provide the following information to support the required CEQA Land Use analysis of project consistency with land use plans, policies, and regulations adopted for the purpose of mitigating an environmental effect:

- a. Provide a list of applicable CMAs from the DRECP LUPA and applicable IOPs from the West-Wide Energy Corridor ROD. For each applicable CMA or IOP, explain how the project would comply with the requirements of that measure.
- b. Please identify the extent to which BLM would apply the new and/or revised IOPs from the Section 368 Energy Corridor Final Report to the proposed project's ROW Grant authorization. Identify any new or revised IOPs from the Section 368 Energy Corridor Final Report that could be incorporated into the BLM's permit conditions for the project's ROW Grant authorization.

TRAFFIC AND TRANSPORTATION

Per Section 2.5.8 of the Project Description (Revision 1, TN 261595) submitted by the applicant, the construction period would include 1,000 truckloads per month (40 trucks/day x 25 construction days), but up to 90,000 truckloads for the total 18-month construction period. Later in that paragraph, it states 80 trucks per day. Moreover, the transportation analysis (Table 1 of Appendix M, Revision 1, TN 259705) shows 100 trucks/day.

REV 1 DR TRANS-1. Please clarify the level of truck activity (trucks/day) that is anticipated during construction.

VISUAL RESOURCES

CEC Siting Regulations Appendix B (g) (6) (D) (v) b. require the description of reflectance (glare) from the exterior surfaces of the Project's large buildings, structures, and major equipment. The Soda Mountain Solar Project Environmental Impact Report, Section 3.1 Aesthetics (TN 257910), provides a discussion of Glare on pages 3.1-32 to 3.1-34. In that discussion there appears to be the following inconsistency with respect to glare that might be experienced along I-15.

The second paragraph of Page 3.1-33 states, "...travelers along I-15 would experience '0' minutes of potential glint or glare; therefore, there are no glare impacts to vehicular travel routes (i.e., I-15)."

However, the next sentence states, "...a viewer standing along I-15, represented by KOP 4, could experience up to 198 minutes per year of green ocular impact and that the ...glare would occur from mid-November to the end of January from 6:00 a.m. to 7:30 a.m. for approximately 8 minutes per day."

While one could assume that a stationary person standing at KOP 4 adjacent to the freeway could capture a wider frame of view, which would encompass a viewing angle greater than the typical primary cone of vision (extending 45° either side of the direction of travel or 90° total) of motorists on I-15, this would be speculation. Also, it is reasonable to assume that the purpose of KOP 4 is to represent the viewing experience of northbound motorists on I-15 and not that of a stationary individual adjacent to the freeway.

REV 1 DR VIS-1. Please clarify the potential contradiction in the description of glare that would be experienced by motorists on I-15 and a stationary individual at KOP 4. Provide additional detail as to the view directions/viewing angles from northbound and southbound I-15 that would and would not experience glare and to what extent. Provide sufficient detail to confirm whether or not a hazardous driving condition may occur along I-15 as a result of project-induced glare. Also, provide similar additional information that clarifies the view direction/viewing angles at KOP 8 that would experience glare.

In the applicant's response to DR VIS-1, revised and new KOPs and simulations were provided. However, when comparing the KOP 4 simulation location shown on revised Figure 3.1-4 (KOP simulation locations) of the Environmental Impact Report and the visual simulation for KOP 4 presented in Appendix F (Visual Simulations) of the revised Technical Report, Figure 3.1-4 suggests that viewing northeast from KOP 4 would show the proposed BESS Yard fairly centered in the image and just to the north (left) of the proposed substation, backdropped by solar arrays. However, the KOP 4 simulation does not include the BESS Yard, which, if Figure 3.1-4 is correct, should be fairly central in the view.

REV 1 DR VIS-2. Please clarify the potential inconsistency between what is indicated in Figure 3.1-4 and what is shown in the simulation for KOP 4 with respect to BESS Yard visibility from KOP 4 (northbound I-15), and if necessary, revise the simulation as appropriate.

Although the CEC has overall permitting authority over the project, the CEC does take into consideration regulatory requirements of other jurisdictions relative to the project. Specifically, Appendix B (i) (1) (A) requires a tabular or matrix presentation of the laws; regulations; ordinances; standards; adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project. Also required is a discussion of the applicability of, and conformance with, each. The table or matrix shall explicitly reference pages in the application wherein conformance with each law or standard during both construction and operation of the facility is discussed.

Although Subsection 3.1.1 provides a narrative discussion of applicable regulatory requirements, the response to original Data Request DR VIS-9, Subsection 3.1.4 provides an incomplete table of the applicable laws, ordinances, regulations, and standards, with general references to report sections and appendices where conformance is discussed. Therefore, the submittal is incomplete.

Specifically: Table 3.1-4 is incomplete in that specific regulatory objectives, measures, standards, and policies are not identified. Additionally, specific page numbers identifying where project conformance is addressed for each regulatory requirement are not provided as required. Additionally, the report section and appendices do not specifically state whether or not the project is in conformance with each regulatory standard during both construction and operation of the facility. A few examples of questions that still need to be answered include:

- Is the Project (construction and operation) in conformance with the applicable BLM VRM Class objective(s)? Explain how.
- Is the Project (construction and operation) in conformance with the identified DRECP LUPA-VRM and GPL-VRM measures? Explain how.
- Is the Project in conformance with the specific management direction of the Mojave National Preserve General Management Plan? Explain how.

- Is the Project (construction and operation) in conformance with the California Building Energy Efficiency Standards, Title 24, Part 6? Explain how.
- Is the Project (construction and operation) in conformance with each identified policy of the San Bernardino County General Plan and Development Code? Explain how.

REV 1 DR VIS-3. As specified in the above Siting Regulation, provide a table or matrix of the individual laws; regulations; ordinances; standards; adopted local, regional, state, and federal land use plans, leases, and permits applicable to the project. Also provide a discussion of the applicability of, and conformance with, each. The table or matrix shall also explicitly reference pages in the application wherein conformance with each law or standard during both construction and operation of the facility is discussed.

WORKER SAFETY

The updated Project Description (TN #: 261595) states that three 10,000-gallon water tanks would be located throughout the site near the operation and maintenance building, BESS, and adjacent to the solar arrays to provide storage of water used for fire suppression. However, the updated Appendix Q (TN #:257942) states that an approximately 22,500-gallon tank would be located near the operation and maintenance building to provide storage of fire suppression water (and no other permanent water tanks are identified). It remains unclear whether traditional water-based fire suppression would be used in any instance for BESS-related fires and if the proposed dry pipe system could also allow water to enter the containers instead of inert gas. Provide a detailed project site plan of the BESS facility including setback distances, road width dimensions, location of hydrants and water tanks, and any other structures/equipment relevant to fire protection and suppression. Provide how the locations of hydrants and permanent water tanks integrate with the fire protection measures outlined in the O&M Fire Protection and Prevention Plans.

Provide more details on the dry pipe fire suppression system for fire cessation via displacement of oxygen with an inert gas and its effectiveness during a thermal runaway event. Clarify if deflagration panels would be provided or if other explosion prevention features are incorporated into the overall container design as a backup to the ventilation system.

REV 1 DR WS-1. Please provide more details on the dry pipe fire suppression system for fire cessation via displacement of oxygen with an inert gas and its effectiveness during a thermal runaway event. Clarify whether the inert gas (assumed to be nitrogen) would be stored on site or if the fire department would be required to transport it to the site during a BESS-related fire. Clarify whether deflagration panels would be provided. If deflagration panels would not be provided, clarify why they are not required. Clarify if other explosion prevention

features are incorporated into the overall container design as a backup to the ventilation system.

The UL 9540A Test Method is referenced within UL 9540, the Standard for Energy Storage Systems and Equipment, the American and Canadian National Standard for Safety for Energy Storage Systems and Equipment, the International Code Council (ICC) International Fire Code (IFC), National Fire Protection Association NFPA 855, Standard for the Installation of Stationary Energy Storage Systems, as well as a wide variety of local, state and international building and fire codes. It is a standard test method for evaluating thermal runaway fire propagation in battery energy storage systems. The fire protection measures for the selected battery system have been described in the updated Appendix Q (TN #:259704), but the UL 9540A fire testing results have not been provided.

REV 1 DR WS-2. Please provide the UL 9540A fire testing results for the selected battery system.

The updated Appendix Q (TN #:259704) describes the ventilation system's role in removing hydrogen gas and smoke when activated by detector alarms. However, it does not specify the duration of backup power available to sustain ventilation during an outage. Since the ventilation system must remain operational whenever hydrogen gas is detected at a concentration of 10% of the lower explosive limit, understanding its backup power capacity is essential for evaluating fire safety measures.

REV 1 DR WS-3. Please specify the number of hours of backup power available for the ventilation system to ensure continuous operation when hydrogen gas levels require ventilation.

A preliminary review of the proposed battery CATL EnerC Plus BESS units was conducted by CEC staff. A review of the CATL Energy Storage System Solutions and Product Brochure (https://www.catl.com/en/uploads/1/file/public/202406/20240624152558_qft6x51t14.pdf) indicates that the project would be the largest BESS facility utilizing CATL BESS units at 300 megawatts (MW).

REV 1 DR WS-4. Please confirm whether the project BESS would be CATL BESS units at 300 MW. If not, please provide example facilities of similar magnitude to the proposed Project that also utilize CATL BESS units and that are not included in the CATL Product Brochure or website. Provide a history of BESS failure incidents and cause of failure for BESS facilities utilizing CATL technology.