

DOCKETED

Docket Number:	24-OPT-03
Project Title:	Soda Mountain Solar
TN #:	264917
Document Title:	Batch 1 Data Responses - July 2025
Description:	Responses to: REV 1 DR BIO-1 REV 1 DR BIO-2 REV 1 DR ES-1 REV 1 DR LAND-1 REV 1 DR TRANS-1 REV 1 DR VIS-1 REV 1 DR VIS-2 REV 1 DR VIS-3
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Submission Date:	7/18/2025 5:03:04 PM
Docketed Date:	7/21/2025

Soda Mountain Solar Project**CEC Data Request Response****July 18, 2025****1. Introduction****1.1 Introduction**

On June 18, 2025, Soda Mountain Solar LLC received a Second Determination of Incomplete Application and Request for Information from the California Energy Commission (CEC) for the Soda Mountain Solar Project (24-OPT-03). Table 1 lists all Data Requests for which a response is provided in this submittal. Additional submittals will be provided to complete the Applicant teams response to all CEC data requests.

1.1.2 Project Description

In addition to addressing the data request identified in the June 18, 2025 letter, an updated Project Description has been provided with this submittal. The Project Description has been updated to ensure the project undergoing review by the CEC is exactly the same as the project undergoing review by the Bureau of Land Management. The updates to the Project Description are considered minor and include the following:

- 1) The addition of on-site water wells as a water supply source for the project. To support this project modification, a Water Supply Assessment will be provided to the CEC in a separate submittal.
- 2) Clarification related to construction and operational access to all project components located north of the I-15.
- 3) Clarification that the gen-tie crossing may cross the I-15 either via an overhead line or under the I-15 in one bore.
- 4) Supplemental Engineering Information: Based on conversations with the California Department of Transportation (Caltrans), Los Angeles Department of Water and Power (LADWP) and Bureau of Land Management (BLM) the following documents are provided to ensure consistency between agency reviews and are related to the Project Description:
 - a. Caltrans - Encroachment Permit Applications
 - b. LADWP - 500kV Transmission Line Design Criteria
 - c. LADWP - 500 kV Interconnection Switching Station Substation Layout Sketch
 - d. LADWP – 500kV HVAC Underground Cable System Design Basis
 - e. BLM – Traffic Control Plan

All of the minor Project Description modifications identified above have been fully analyzed within the environmental documents docketed. The project as described in this submittal is identical to the project currently undergoing permitting through BLM, ensuring the CEC permitting and the BLM permitting are in full alignment.

Table 1. Data Responses Included in July 18, 2025 Response Set

Data Request Resource Area	Data Request Number
Biological Resources	REV 1 DR BIO-1

	REV 1 DR BIO-2
Executive Summary	REV 1 DR ES-1
Land Use	REV 1 DR LAND-1
Traffic and Transportation	REV 1 DR TRANS-1
Visual Resources	REV 1 DR VIS-1 REV 1 DR VIS-2 REV 1 DR VIS-3

4. BIOLOGICAL RESOURCES

4.1 DATA REQUESTS REV 1 DR BIO-1 THROUGH REV 1 DR BIO-3

4.1.1 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.

Response: A new jurisdictional delineation for the project has been added to the project docket in response to this comment.

4.1.2 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.

Response: To access all project components north of the I-15, the project will use an existing travel route (CL 8847 and CL7682 from Zzyzx Road) and/or construct and use a temporary exit off southbound I-15 near the gen-tie corridor. The temporary exit off southbound I-15 would occur within a developed and disturbed area of the freeway corridor and would not result in any new environmental impacts. CL 8847 and CL7682 is an existing travel route that is already disturbed and used by vehicles and the project's additional use of this road would not result in any new significant environmental effects as no roadway improvements are proposed. An updated Project Description has been added to the docket to address this comment.

5. EXECUTIVE SUMMARY

5.1 Data Request REV 1 DR ES-1

5.1.1 REV 1 DR ES-1: Please update figure to include the missing lines. 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.

Response: Figure 1-1 has been updated to include existing fiber-optic line, a petroleum pipeline and a fuel pipeline, as noted in the legend. This figure is included in the updated Project Description.

6. LAND USE

6.1 DATA REQUEST REV 1 DR LAND-1

6.1.1 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:

- 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.

- 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.

Response:

As demonstrated in Table 3.11-1 the project, including the solar facility and gen-tie line would be consistent with the California Desert Conservation Area's (CDCA) as amended by the Desert Renewable Energy Conservation Plan (DRECP) Land Use Plan Amendment (LUPA), and its Conservation and Management Actions (CMAs). Additionally, the project is also located within the 27-225 energy corridor designated by the West-Wide Energy Corridor (WVEC) Record of Decision (ROD). As demonstrated in Table 3.11-2 the project, including the solar facility and gen-tie line would be consistent with the WVEC, and its IOPs.

Section 3.11 Land Use and Planning – July 2025 – Revision 2, Table 3.11-1 and Table 3.11-2, Page 3.11-12

7. TRAFFIC AND TRANSPORTATION

7.1 DATA REQUEST REV 1 DR TRANS-1

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

Response: Appendix M Transportation Analysis - October 2024 - Revision Description: 1 (TN 259705) identifies the correct level of truck activity (trucks/day) that is anticipated during construction. Specifically, Table 1: Project Construction Daily Trip Generation is correct. The updated Project Description has been corrected to match the Transportation Analysis.

8. VISUAL RESOURCES

8.1 DATA REQUESTS REV 1 DR VIS-1 THROUGH REV 1 DR VIS-4

8.1.1 REV 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.

Response:

The Glare analysis Appendix and the portion of the Visual Resources Technical Report has been updated with text to describe the specific conditions of the Glare analysis and results of OP 4 and OP 8.

See Appendix B Visual Resources Report - July 2025 - Revision 2

8.1.2 REV 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.

Response:

The BESS units are depicted in the photo simulation for KOP 4, and can be seen in the lower left of the simulation as a repeating series of off-white rectangular forms between the perimeter fencing and the solar arrays. A separate annotated version of the simulation was created to identify each of the major project components visible in the photo simulation at KOP 4.
See Appendix B Visual Resources Report - July 2025 - Revision 2

8.1.3 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.

Response:

The laws, ordinances, regulations, standards, plans, and permits sections of the Visual Resources Technical Report was thoroughly revised and updated to define what laws, ordinances, plans, and policies are directly and legally applicable to the project, and those that were included as contextual or informational only. In addition, Section 5 of the Visual Resources Technical Report was thoroughly revised to discuss the project's compliance with the applicable plans, policies, laws, etc. during the project's construction and O&M stages. Note to CEC reviewers: the California Building Energy Efficiency Standards Title 24 Part 6 pertains to the project's specific electrical lighting design components and is beyond the scope considered by the visual resources technical report addressing the visual effects of project lighting.
See Appendix B Visual Resources Report - July 2025 - Revision 2