

DOCKETED

Docket Number:	24-OPT-03
Project Title:	Soda Mountain Solar
TN #:	265144
Document Title:	Response to REV 2 Data Requests
Description:	This document addresses the items identified in Attachment B REV 2 Data Requests.
Filer:	Hannah Arkin
Organization:	Resolution Environmental
Submitter Role:	Applicant Representative
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Soda Mountain Solar Project**CEC Data Request Response****July 30, 2025****1. INTRODUCTION**

On July 25, 2025, Soda Mountain Solar LLC received follow up data requests (REV 2) to the applicant's responses to REV 1 Data Requests. This document addresses the items identified in Attachment B REV 2 Data Requests.

2. BIOLOGICAL RESOURCES**2.1 DATA REQUESTS REV 2 DR BIO-1 AND REV 2 DR BIO-2**

2.1.1 REV 2 DR BIO-1: As previously requested, please provide a revised delineation of state jurisdictional waters and CDFW streambed features. The revised delineation should cover the remaining 92 percent of the project area that was not included in the Rincon report.

Response: This transmittal provides figures providing additional jurisdictional delineation information for the Soda Mtn Solar Project. These figures show the original SWCA delineation, the Rincon sample plots, and the desktop delineation of the remainder of the site. To calculate the total acreage of jurisdiction limits within the study area, the average width of these features from the sample plots were used.

Previous Calculations		For CDFW Jurisdiction
Solar Array	Acres	Lin. Feet
E	43.25451	459500.404
S1	40.74619	214316.7573
S2	71.65017	531859.4848
S3	22.50766	113380.4015
TOTAL	178.1585	1,319,057.05

Linear Feet and Acres of CDFW Jurisdiction based on attached desktop mapping

Row Labels	Sum of LinearFt
East Array	257,190.48
South Array 1	235,381.93
South Array 2	380,711.87
South Array 3	131,569.73
Grand Total	1,004,854.02

Row Labels	Sum of Acres
East Array	29.92
South Array 1	27.55
South Array 2	44.26
South Array 3	15.24
Grand Total	116.97

2.1.2 REV 2 DR BIO-2: Please confirm if CL8845 is proposed for use as part of the project to access the gen-tie alignment. Additionally, please confirm that BLM roads CL8854, CL8835, CL381A, and CL8837 are not being proposed for use and that these roads are included on the figures for reference purposes only. As previously requested, please also 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: A memo providing a response to REV 2 DR BIO-2 has been added to the docket.

3. GREENHOUSE GASES

3.1 DATA REQUEST DR REV 2 GHG-1

3.1.1 DR REV 2 GHG-1. Please clarify how the project would comply with the CARB HFC regulation.

Response: It has been confirmed by Tesla that they are in the process of receiving a variance from CARB allowing the Megapack 2XL to defer the refrigerant compliance under CARB regulation Prohibitions on Use of Certain Hydrofluorocarbons (HFCs) in Refrigeration, Stationary Air-Conditioning, and Other End-Uses (<https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2020/hfc2020/frorevised.pdf>) (17 Cal. Code Regs., § 95371 et seq.) to a later date (TBD). The variance application will be approved within the next few months.

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4. LAND USE

4.1 DATA REQUESTS REV 2 DR LAND-1 AND REV 2 DR LAND-2

4.1.1 REV 2 DR LAND-1. To help support staff's Land Use analysis of the project's conformity with applicable federal plans, leases, and permits accurately addresses BLM's procedures and requirements, please provide the following information:

- a. Provide any correspondence with the BLM regarding the agency’s decision to conduct a new environmental review process of the project as currently proposed under NEPA. Confirm that an EA will be prepared by the BLM and that the DRECP LUPA is applicable to the project.
- b. Identify any requirements for additional studies (e.g., amendments to the Plan of Development and supporting appendices), surveys, etc. that must be provided to the BLM to support the EA analysis for the project.

Response: CEC’s data request *refers to a BLM application that is no longer being processed*. As indicated in the screenshot below from BLM’s NEPA Register for DOI-BLM-CA-D010-2024-0002-DNA (<https://eplanning.blm.gov/eplanning-ui/project/2034061/510>), this application has been cancelled and is no longer being processed by BLM.

Project Information	
NEPA Number:	DOI-BLM-CA-D010-2024-0002-DNA
Project Name:	Soda Mountain Solar Project Amendment
Project Type:	Determination of NEPA Adequacy
NEPA Status:	Cancelled - Cancelled
Lead Office:	California Desert DO
Last Updated:	04/07/2025 11:58:31 MDT

The Applicant is preparing to submit to BLM a set of new application materials requesting amendments to the Plan of Development and Right-of-Way Grant, which would modify an earlier BLM-approved version of the project. Because these application materials have not yet been submitted to BLM, BLM has not decided how it will comply with NEPA for these proposed amendments, nor has BLM determined whether the DRECP applies to these proposed amendments.

The Applicant believes the proposed amendments to the Plan of Development and Right-of-Way Grant qualify for a Categorical Exclusion under NEPA, and therefore an Environmental Assessment will not need to be prepared.

The proposed project (as it is being modified from the earlier BLM-approved version of the project) cannot go forward without BLM approval of amendments to the Plan of Development and Right-of-Way Grant. As part of this amendment process, BLM will determine whether and to what extent the DRECP applies to the project (as modified). If BLM determines that the DRECP applies to the amended project and that the amended project is not in conformity with the DRECP, then BLM would require a plan amendment to bring the amended project into conformity with the DRECP. In such circumstance, BLM would need to approve a plan amendment in order to approve the applicant’s requested amendments to the Plan of Development and Right-of-Way Grant, and would process the plan amendment in tandem with the approval of those amendments. Similarly, as part of this amendment process, BLM will determine whether and to what extent any DRECP CMAs and West-Wide Energy Corridor IOPs are applicable to the project (as it is being modified from its earlier BLM-approved version of the project). BLM would require the amended project to comply with any DRECP CMAs and West-Wide Energy Corridor IOPs that it determines are applicable to the amended project. Thus, this concurrent BLM approval process will ensure the project conforms with all applicable BLM land use plans.

4.1.2 REV 2 DR LAND-2. Please provide the following information to support the required analysis of project consistency with land use plans, policies, and regulations adopted for the purpose of mitigating an environmental effect:

- a. For each of the applicable CMAs from the DRECP LUPA and applicable IOPs from the West-Wide Energy Corridor ROD that are listed in Table 3.11-1 and Table 3.11-2 (TN 264863), explain clearly the specifics of project design measures or mitigation measures that would be implemented to ensure compliance with the requirements of the applicable CMA or IOP.
- b. 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:

(a) For each applicable CMA or IOP, either a specific section (i.e., See Section 3-4, Biological Resources), APM (applicant-proposed measure), or MM (mitigation measure) is referenced, or a combination of the three. Some CMAs or IOPs are either too general or specific that there isn't one APM or MM that covers the exact wording but it may be discussed in the individual resource sections or appendices.

(b) The 2022 Section 368 Energy Corridor Final Report was reviewed, and the three recommended revisions and three recommended additions were incorporated into the appropriate sections of Table 3.11-2. If a suggested IOP was not applicable, this was noted in the table. For IOPs that could be applicable, information was added regarding their applicability, with the understanding that adoption as BMPs is at the BLM's discretion.

Section 3.11 Land Use and Planning – July 2025 – Revision 3, Table 3.11-1 and Table 3.11-2

5. PUBLIC HEALTH

5.1 Data Request REV 2 PH-1

5.1.1 REV 1 DR ES-1: DR REV 2 PH-1. Please provide the UL 9540A test report for the CATL EnerC Plus BESS alternative as requested in REV 1 DR WS-2 and REV 1 DR PH-1. Please also provide the total number of cells and modules per container for the CATL EnerC Plus BESS alternative.

Response: The UL 9540A test report for the CATL EnerC Plus BESS alternative will be provided as a confidential appendix. (Appendix D). Page 4 of the UL 9540A test report provides the number of modules in the BESS (8) and the number of cells in the module (104).

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6. WATER RESOURCES

6.1 DATA REQUEST REV 2 DR WATER-1

6.1.1 REV 2 DR WATER-1. Please explain if any of the impact analysis of the Soda Mountain subbasin groundwater resource is based on the data from the subbasin? If so, please submit this data to the project docket.

Response: Yes, analysis of the Subbasin was based on data from the Subbasin – specifically, test well PW-1 which was installed to conduct groundwater investigations for the 2015 EIS, as detailed in Appendices H1 through H4 to the 2015 EIS. Those documents are referenced in the Water Supply Report and a PDF of each is included

Section 4.3.4 has been revised to clarify that there are no existing producers in the Subbasin (saved with “_Rev 25Jul25” at end of file name):



