DOCKETED	
Docket Number:	24-OPT-03
Project Title:	Soda Mountain Solar
TN #:	265169
Document Title:	Response to REV 2 DR BIO-2
Description:	This memo provides a response to REV 2 DR BIO-2
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Organization:	Resolution Environmental
Submitter Role:	Applicant Representative
Submission Date:	7/30/2025 4:13:22 PM
Docketed Date:	7/30/2025

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July 30, 2025
25-17245

Subject: Response to REV2 DR BIO-2 Soda Mountain Solar Access Road Assessment Project Site, in the San Bernardino County, California

This memo is a response to Attachment B REV 2 Data Request, REV 2 DR BIO-2, to address biological resources and jurisdictional waters that have the potential to occur along proposed access roads and 50-ft buffer.

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-ft 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

CL8845 is proposed for use as part of the project to access the gen-tie alignment. No road improvements or maintenance will occur within the existing road.

CL8847, from Zzyzx Rd to where it connects with CL7682 is proposed for use. No road improvements or maintenance will occur.

CL8854, CL8835, CL381A, and CL8837 are not proposed for use and were included in the figures for references purposes only.

A desktop analysis addressing areas within 50-ft of proposed access roads is included below.

Desktop Analysis

Literature Review

A desktop analysis and literature review were conducted using California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB; CDFW 2025a), CDFW Vegetation Classification and Mapping Program (VegCAMP; CDFW 2025b), the United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI; USFWS 2025), the USGS National Hydrology Dataset (USGS 2025), and Section 3.4 of the EIR to assess potential impacts to biological and jurisdictional waters along proposed access roads. Attachment 1 illustrates vegetation mapped within 50 feet of proposed access roads.

Vegetation Coverage

Creosote Bush Mixed Scrub

VegCamp identified Creosote Bush Mixed Scrub over the majority of the proposed access roads which correlates to the results described in the draft EIR and Biological Technical Report along the gen tie. Creosote Bush Scrub Creosote Bush Scrub is characterized by an open to intermittent canopy that

may be two-tiered. The herbaceous layer is open to intermittent, with seasonal annuals. The alliance is typically found in the minor washes and rills, alluvial fans, bajadas, and upland slopes. The soils may be well drained, alluvial, colluvial, and sandy. Creosote bush and white bursage (*Ambrosia dumosa*) are codominant in the shrub canopy with allscale saltbush (*Atriplex polycarpa*), desert holly (*Atriplex hymenelytra*), silky dalea (*Dalea mollissima*), silver cholla (*Cylindropuntia echinocarpa*), branched pencil cholla (*Cylindropuntia ramosissima*), and cottontop cactus (*Echinocactus polycephalus*). Creosote Bush Scrub was the dominant vegetation community and characterized the majority of the upland habitat. Approximately 58.5 acres are classified as Creosote Bush Scrub within 50 feet of proposed access roads.

Desert Wash System

Approximately 7.1 acres of desert wash system was mapped per VegCAMP. Desert Wash System is generally defined as intermediate drain system within arid desert regions characterized by distinct vegetation types and periodic surface flows.

Jurisdictional Aquatic Features

A desktop delineation utilized NWI, NHD, ESRI imagery (ESRI 2025a), and ESRI hillshade (ESRI 2025b) data to identify potential jurisdictional features within 50 feet of proposed access roads. These features are displayed in Attachment 1, Figures 1A-1H. No new impacts to these features will occur since no improvements to existing access roads are proposed.

Sensitive Species

There are no special status-species documented in CNDDB within 50 feet of the proposed access roads; however, all species identified in Section 3.4 of the draft EIR (SWCA 2025) have potential to occur within suitable habitat adjacent to the access road.

Mitigation Measures

All mitigation measures related to special status species and jurisdictional waters as presented in Section 3.4 of the draft EIR will be implemented as applicable when utilizing access roads. This includes preconstruction surveys, special status species avoidance measures and biological monitoring as applicable for vehicular travel along the access route.

Attachments

Attachment 1 Figures

References

California Department of Fish and Wildlife (CDFW). 2025a. California Natural Diversity Database, Rarefind 5. https://wildlife.ca.gov/data/cnddb/maps-and-data (Accessed July 2025).

_____. 2025b. California Vegetation Classification and Mapping Program, VegCAMP. https://wildlife.ca.gov/Data/VegCAMP (Accessed July 2025).

ESRI. 2025a. World Imagery.

_____. 2025b. World Hillshade.

Google Earth. July 2025.

SWCA Environmental Consultants (SWCA). 2025. Draft Soda Mountain Solar Project Biological Resources Technical Report, San Bernardino County, California. Section 3.4 Biological Resources.

United States Fish and Wildlife Service. 2025. National Wetland Inventory Data Mapper Available at: https://www.fws.gov/wetlands/Data/Mapper.html

United States Geological Survey (USGS). 2025. National Hydrography Dataset. Available at: https://www.usgs.gov/national-hydrography/national-hydrography-dataset. Accessed July 2025

Attachment 1

Figures

Figure 1A Proposed Access Roads with 50-ft Review Buffer

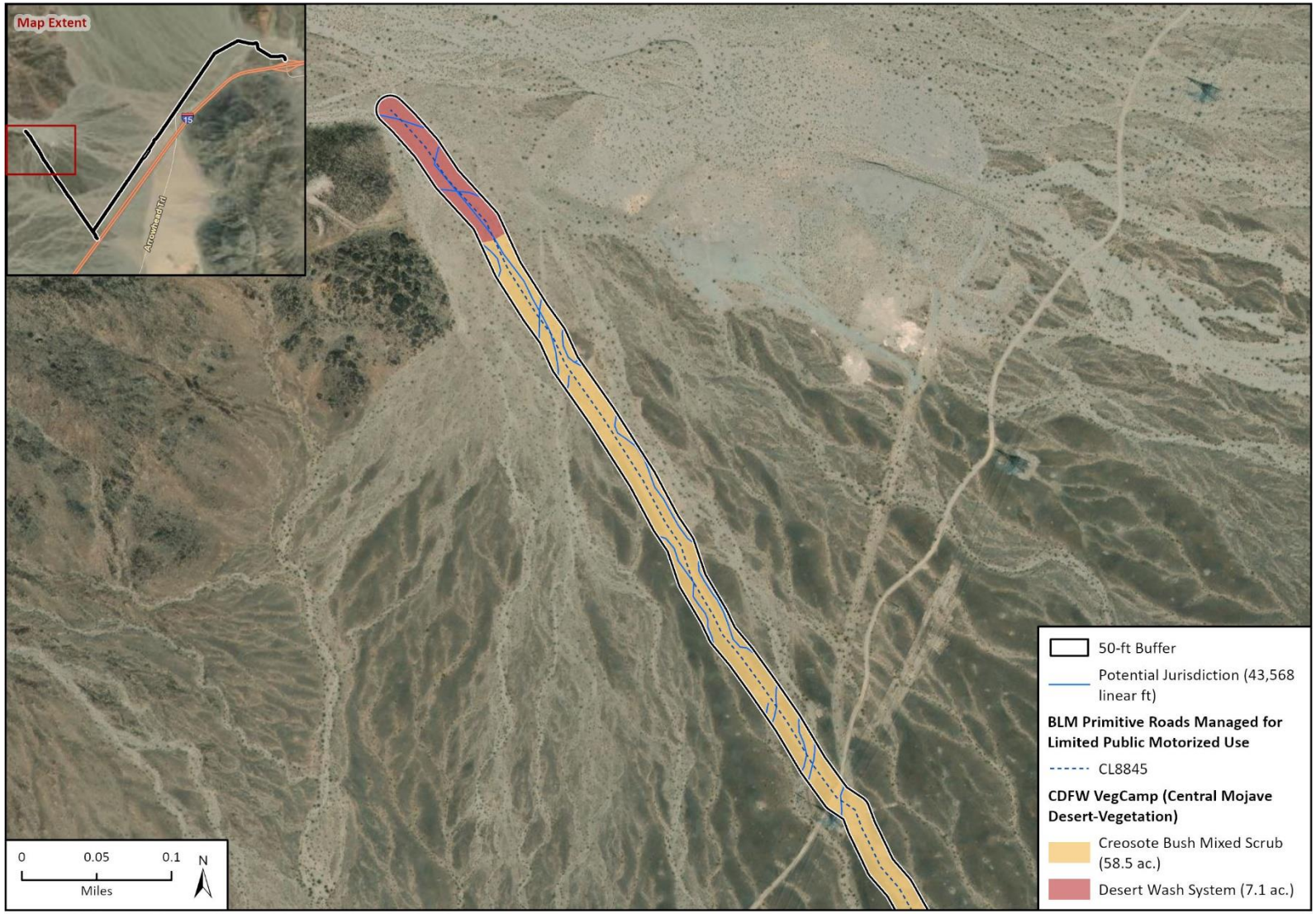


Figure 1B Proposed Access Roads with 50-ft Review Buffer

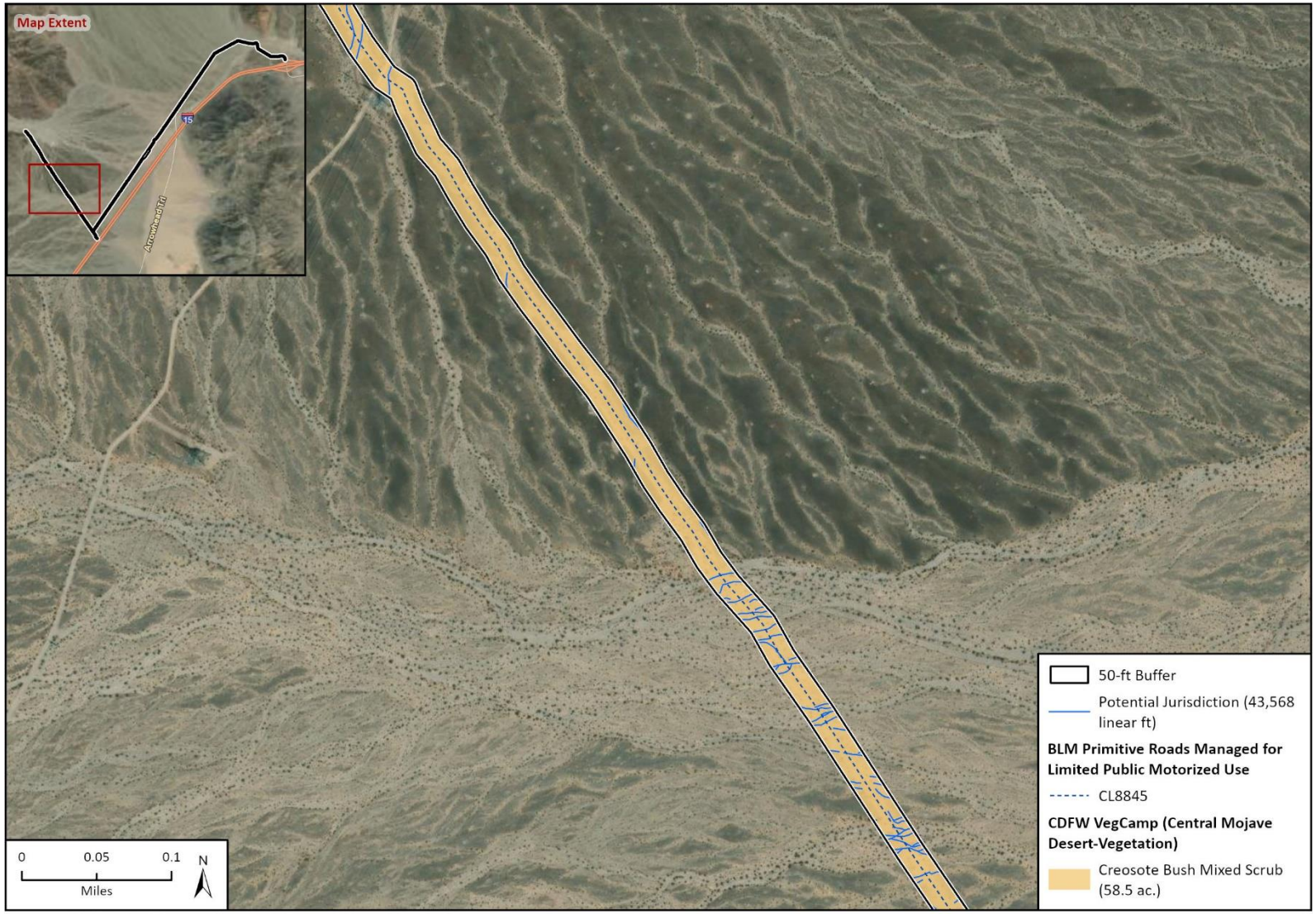
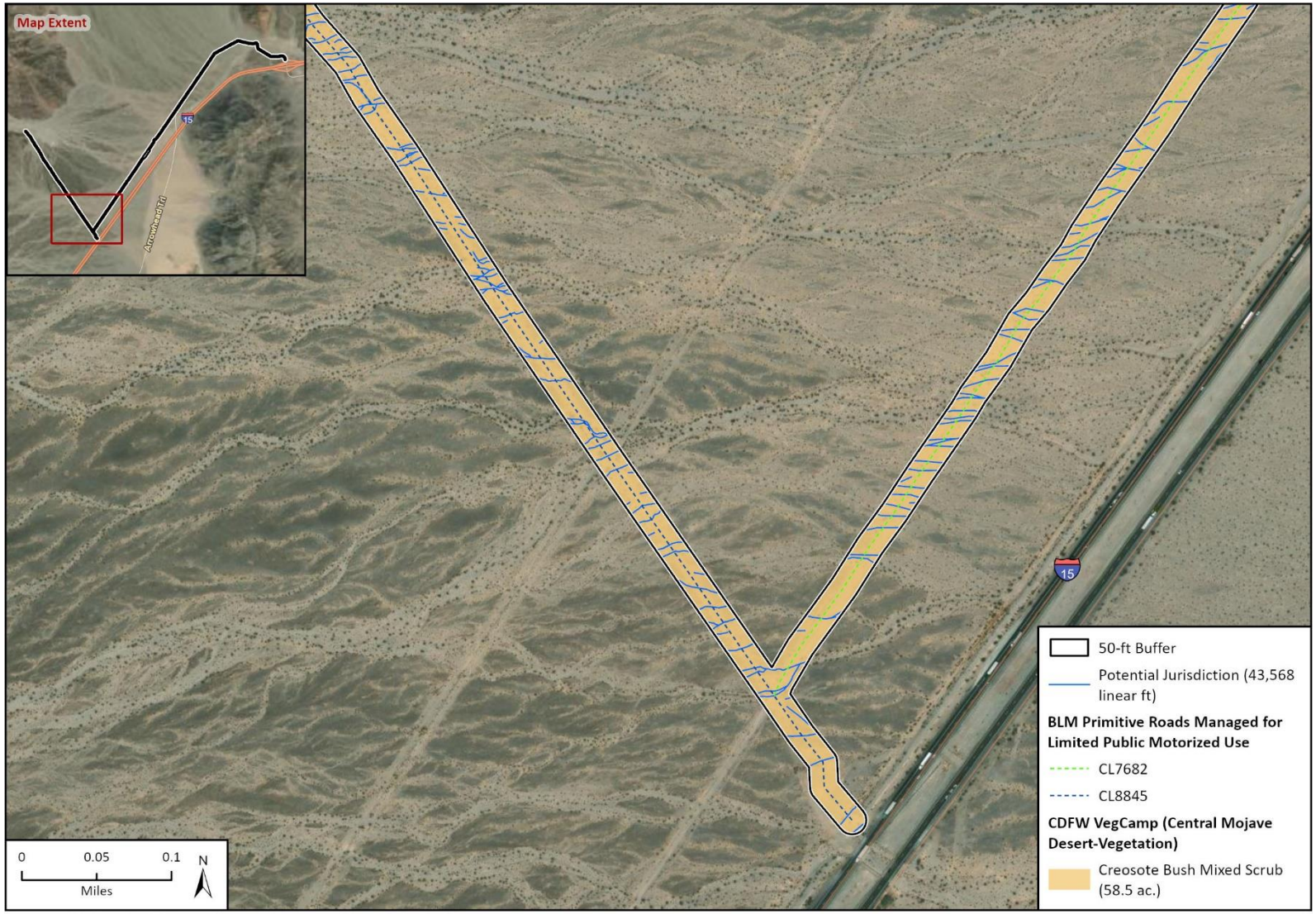


Figure 1C Proposed Access Roads with 50-ft Review Buffer



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Additional data provided CDFW, 2024.

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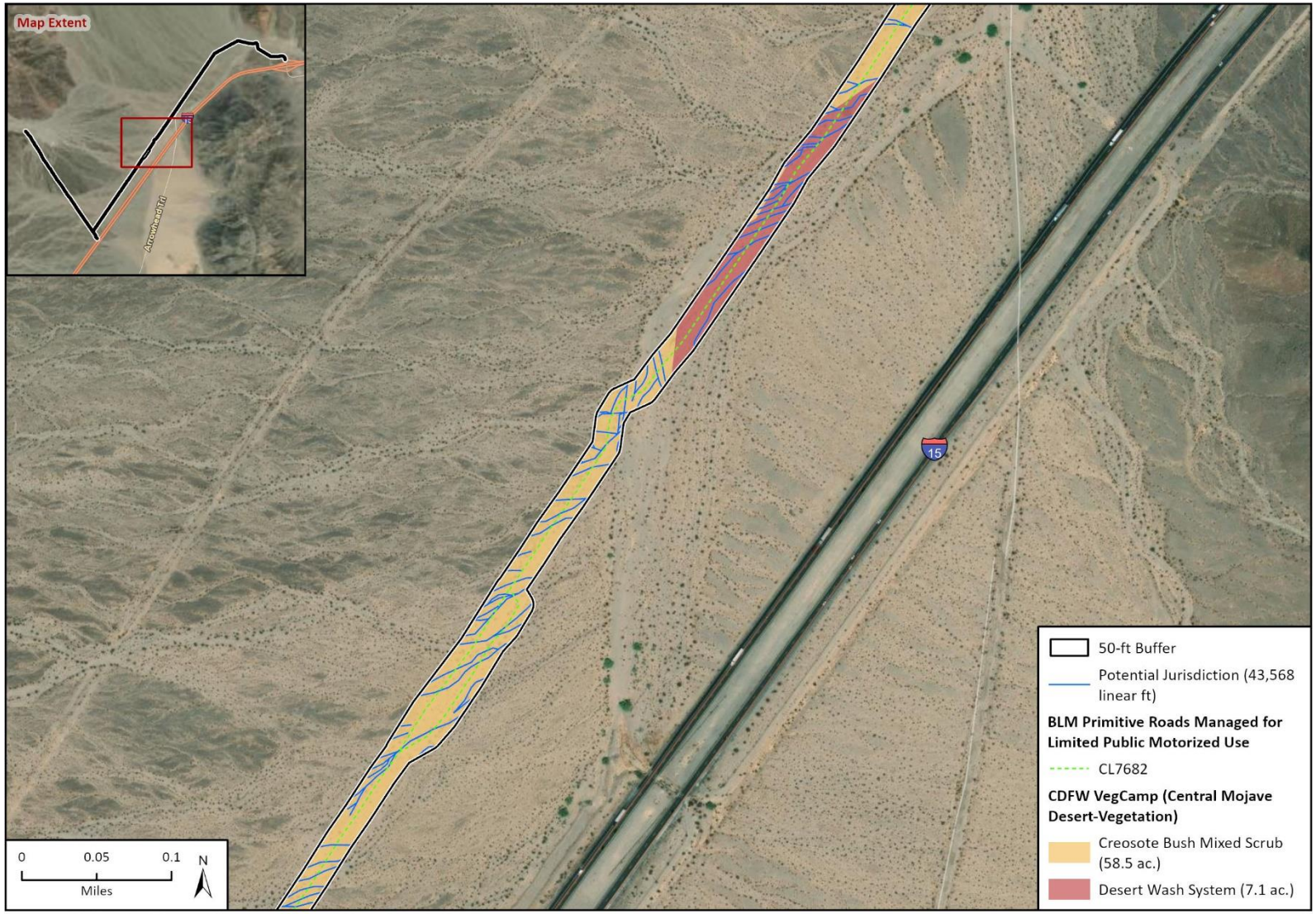
Fig X Access Road Easement

Figure 1D Proposed Access Roads with 50-ft Review Buffer

Figure 1E Proposed Access Roads with 50-ft Review Buffer



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Additional data provided CDFW, 2024.

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Fig X Access Road Easement

Figure 1F Proposed Access Roads with 50-ft Review Buffer

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Fig X Access Road Easement

Figure 1G Proposed Access Roads with 50-ft Review Buffer

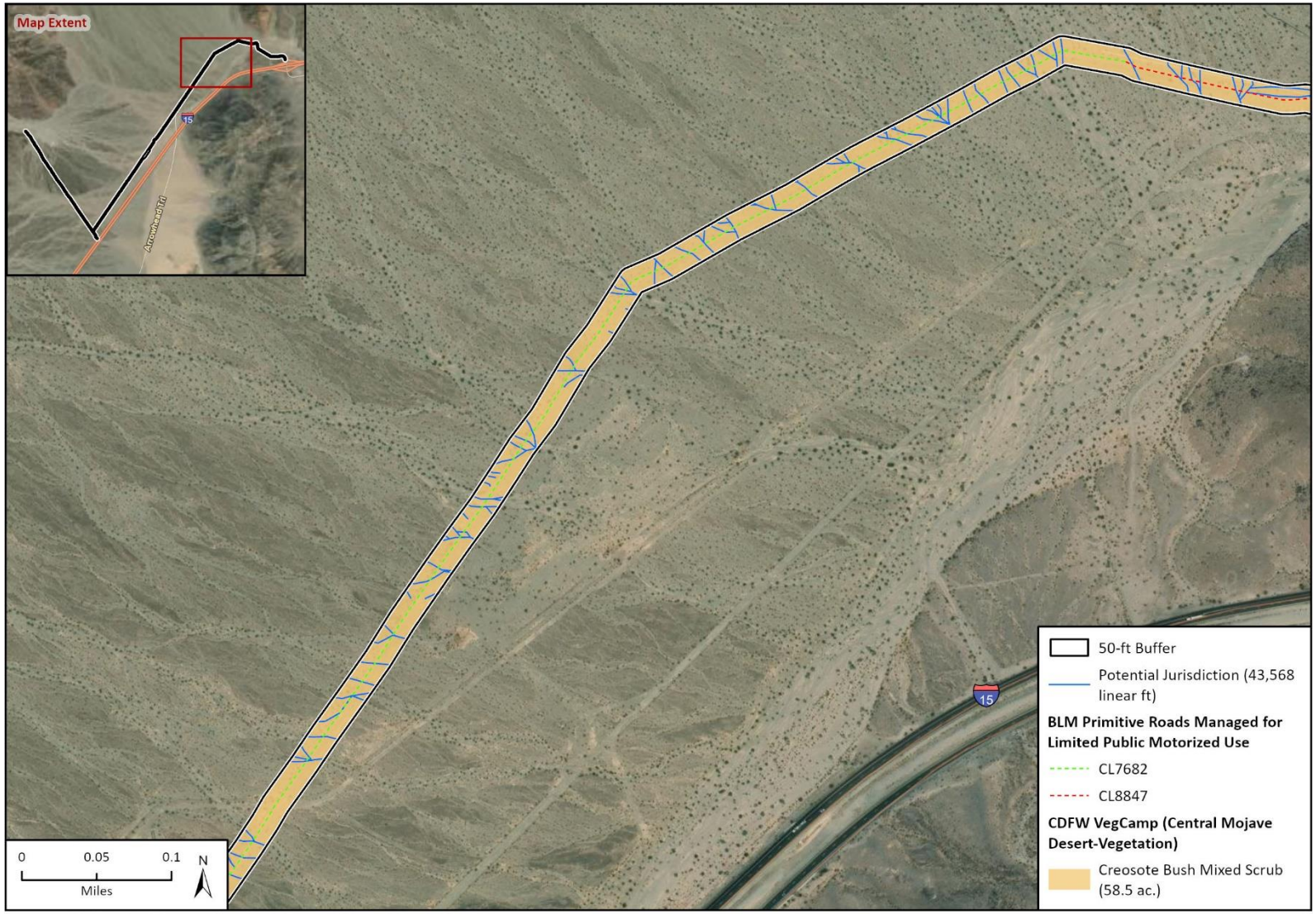
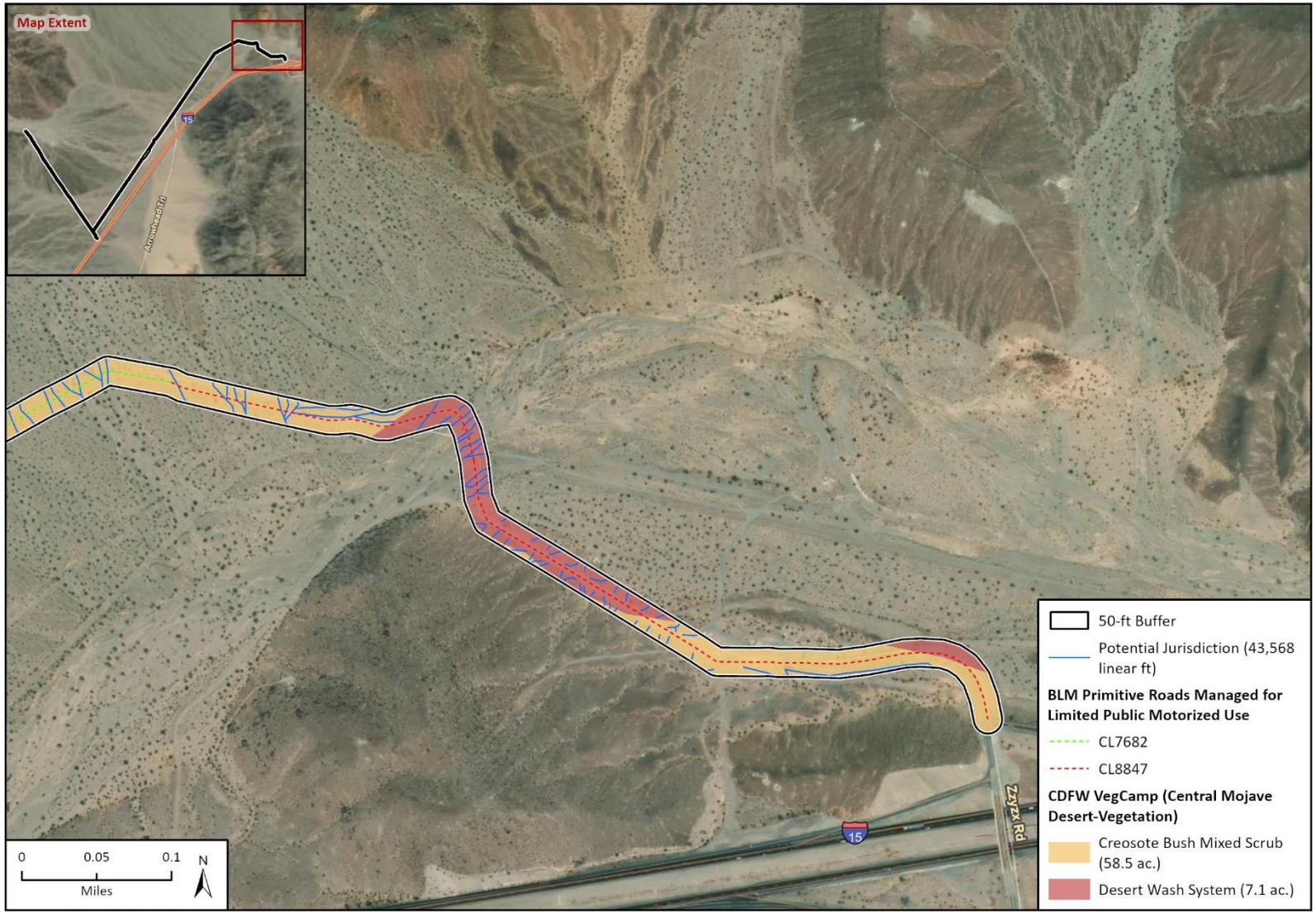


Figure 1H Proposed Access Roads with 50-ft Review Buffer



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Additional data provided CDFW, 2024.

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Fig X Access Road Easement