DOCKETED	
Docket Number:	24-OPT-03
Project Title:	Soda Mountain Solar
TN #:	265178
Document Title:	REV 2 DR LAND-2 and REV 2 DR WATER-1
Description:	This transmittal provides clarifying information for REV 2 DR LAND-2 and REV 2 DR WATER-1
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Submitter Role:	Applicant Representative
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This transmittal provides clarifying information for REV 2 DR LAND-2 and REV 2 DR WATER-1

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: Section 3.11 Land Use and Planning has been revised and re-docketed to clarify that Rasor Road will be permanently open to the public during both project construction and operation. In order to allow public access to the Rasor OHV recreation area. Rasor Road would continue to serve as the main access point for the public into the Rasor OHV recreation area. During project construction and operation, the public would access the Rasor OHV area by traveling through the on-site portion of Rasor Road that has been improved, maintained and aligned to avoid solar panels throughout the project site. Rasor Road would be located between Array 3 and Array 4 and would continue to allow public access to the Rasor OHV recreation area. The solar arrays would be fenced and gated to ensure no public access to the project facilities.

This description of Rasor Road supersedes any past descriptions of Rasor Road in past document submittals. Any past references to Rasor Road being closed during project construction should be considered outdated.

DATA REQUEST REV 2 DR WATER-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.
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Response: The response below provides additional clarification for REV 2 DR-WATER-1.

Question: The Hydrogeological Conditions and Groundwater Modeling Addendum (TRC Solutions 2013) and the Groundwater Modeling Sensitivity Analysis (Burns & McDonald 2014) were both appendices of the original BLM EIR for the Soda Mountain Solar project and addressed the impact to the public groundwater production well at the Zzyzx facility across the Soda Mountains for the project site. As stated in these two documents, the data supporting the modeling was taken from local regional wells outside the Soda Mountain groundwater subbasin.

Response: It is true that the 2013 (TRC Solutions) and 2014 (Burns & McDonald) documents contain information about groundwater modeling that was informed by data collected from regional wells outside the Soda Mountain Subbasin. However, the Water Supply Report prepared for the current project only cited those documents with respect to the test well (PW-1) and the observation well (OW-1) that were installed approximately 187 feet apart along Blue Bell Mine Road – those wells are not located on the current project site, but they are within the Soda Mountain Subbasin. Therefore, it is appropriate to use data collected from wells PW-1 and OW-1 as representative of groundwater conditions at the project site because they are in the same subbasin as the project site.

Question: Will the locations of proposed production wells more closely resemble the Hydrogeological Conditions and Groundwater Modeling Addendum (5 wells) or the Groundwater Modeling Sensitivity Analysis (3 wells).

Response: The location of the potential on-site well(s) is not currently known and will be determined through the

engineering and design processes. However, that siting is not necessary to evaluate overall groundwater conditions in the Soda Mountain Subbasin underlying the Project site, consistent with the purpose of the Water Supply Report to demonstrate whether there's sufficient water supply available to support the proposed uses. The Water Supply Report completed that task using best available data and reasonable assumptions where necessary; clarification regarding the groundwater well data used in the Waer Supply Report are provided in the response above, and explanation regarding required groundwater monitoring is provided in the response below.

Question: The Groundwater Modeling Sensitivity Analysis proposes groundwater drawdown monitoring incorporating a network of five monitoring wells and the Zzyzx groundwater production well. Will this monitoring program be incorporated into the project?

Response: Groundwater monitoring will be conducted as part of the project. The BLM's 2016 ROD for the previous project identified APMs that would be applied as mitigation measures and included groundwater monitoring requirements in APMs 17 and 18 (presented in full in the 2016 ROD Appendix 4, pages 4-38 and 4-39). APMs 17 and 18 require the applicant to recalibrate the groundwater model referenced in the 2013 (TRC Solutions) and 2014 (Burns & McDonald) documents and, if the recalibrated model indicates that outflow from the northeast outlet of the Soda Mountain Valley would be reduced by an amount in excess of 50 AFY, to develop and implement a groundwater monitoring plan. If the Project is shown to cause a decline in groundwater level of 5 feet or more in the alluvial aquifer near Soda Spring, or if there is a decrease in groundwater discharge at Soda Spring that results in the water level in the spring to be less than 4 feet deep, which would threaten the tui chub, then an evaluation would be conducted to determine if the Project is causing reduced groundwater discharge at Soda Spring. If it is determined that the Project has caused a decrease in groundwater discharge at Soda Spring such that the spring is less than 4 feet deep, thereby threatening the tui chub habitat, then the Project would curtail withdrawal of groundwater and instead import a corresponding amount of water from outside of the Soda Mountain Valley.

Question: In addition, the original Soda Mountain Solar project BLM EIR indicates that aquifer characterization was conducted from a test well (PW-1) and an observation well (OW-1) located 187 feet apart along Blue Bell Mine Road.
Response: Yes- this is the well data cited in the Water Supply Report.

Question: The following documents, in addition to the previous questions, would be beneficial in completing the analysis of impacts to the Soda Mountain subbasin groundwater resources:

Response: We have not been able to locate the documents listed below online. Considering they are project-specific geotechnical studies, and likely contain large maps and diagrams, they may only be available in hard copy format from the lead agencies for the 2015 document.

- Site specific geotechnical and geophysical data referenced in the TRC Solutions report;
    - Diaz-Yourman and Associates. 2010. Preliminary Geotechnical Investigation (Phase 1A), Caithness Soda Mountain Solar Facility Project, Baker, San Bernardino County, California. December 2010, 85 p.
- Terra Physics, 2010. Geophysical Characterization of Subsurface Physical Properties, Caithness LLC—Soda Mountain Solar Facility, Southwest of Baker, San Bernardino County, California, dated December 10, 2010, Project No. 09-63, 58 p. Prepared for Wilson Geosciences, December 2011.
- Aquifer characterization reference cited in the Soda Mountain Solar project BLM EIR;
    - Panorama Environmental, Inc., 2014. Groundwater Well Test Report. November.