DOCKETED	
Docket Number:	24-OPT-03
Project Title:	Soda Mountain Solar
TN #:	265739
Document Title:	Response to CEC's Request for Information dated July 31 2025
Description:	Response to DR REV 2 DR BIO-1 Response to DR REV 2 DR BIO-2 Supplement to Appendix AA Determination of Infeasibility for DR BIO-20 LADWP Information
Filer:	Hannah Arkin
Organization:	Resolution Environmental
Submitter Role:	Applicant Representative
Submission Date:	8/21/2025 2:16:01 PM
Docketed Date:	8/21/2025

This transmittal provides the following information:

1) **Response to DR REV 2 DR BIO-1**
   A revised Aquatic Resources Delineation has been docketed in response to CEC's Request for Information dated 7/31/2025 REV 2 DR BIO-1.

2) **Response to DR REV 2 DR BIO-2**
   Attachment 1 provides a complete response to CEC's Request for Information dated 7/31/2025 REV 2 DR BIO-2.

3) **Supplement to Appendix AA Determination of Infeasibility for DR BIO-20**
   Attachment 2 provides refined calculations that determine implementing a 0.25-mile buffer from areas with 10% slope would result in a reduction to the total project footprint of 556 acres, rather than the previously estimated 236 acres. All references in Appendix AA to 236 acres should be replaced with 556 acres.

4) **LADWP Information**
   For clarification, including the switching station, the facilities to be owned by LADWP after project construction is completed by the Applicant includes:
   - Soda Mountain Switching Station
   - 2x 500kV loop in transmission line segments
   - 6x new steel towers
   - Remote equipment at Marketplace & Adelanto stations (see below)

   For additional clarification, there are no offsite transmission upgrades required due to downstream impacts. The only items that are required in terms of upgrades are related to protection settings at the Marketplace and Adelanto substations, which do not involve environmental impacts. These minor transmission upgrades include:
   - Line tuners
   - Wave traps
   - Microwave telecom links
   - Relay protection equipment
   - Metering & controls equipment

Attachment 1

REV 2 DR BIO-1 and DR REV 2 DR BIO-2

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August 20, 2025
25-17245

Subject: Revised 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 road and 50-foot (ft) buffer. This memo includes a desktop analysis and field survey results.

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. This road is within the boundaries of the study area evaluated in the EIR.

CL8847, from Zzyzx Rd to where it connects with CL7682 is proposed for use.

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

A desktop analysis and field survey were conducted within the proposed access road (CL8847 and CL7682) and 50-ft buffer and are discussed in more detail 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 Environmental Impact Report (EIR) to assess potential impacts to biological and jurisdictional waters along proposed access road.

Vegetation Coverage

The desktop analysis showed two vegetation communities along the proposed access road and 50-ft buffer which included creosote bush mixed scrub and desert wash system. These vegetation communities are described in more detail below.

Creosote Bush Mixed Scrub

VegCamp identified Creosote Bush Mixed Scrub over the majority of the proposed access road which correlates to the results described in the draft EIR and Biological Technical Report along the gen tie. 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 (*Larrea tridentata*) 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 cotton top cactus (*Echinocactus polycephalus*). Specific vegetation communities observed on site are discussed further under Field Survey.

Desert Wash System

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-ft of proposed access road. These features were verified during field surveys and are discussed further in the revised Aquatic Resources Delineation Report. Approximately 1.87 acres of potential CDFW jurisdiction features and 1.02 acres of potential RWQCB features were mapped and verified with in the proposed access road and 50-ft buffer.

CNDDB Desktop Analysis

There are no special status-species documented in CNDDB within 50-ft of the proposed access road; 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.

Field Survey

Survey Methodology

Rincon biologists conducted a field verification and survey for sensitive biological resources along the proposed access road and a 50-ft survey buffer (Attachment 1, Figures 1A-1J). Survey data and weather conditions are included in Table 1. Pedestrian transects occurred parallel with proposed access road (CL7682 and CL8847). The purpose of the survey was to verify the desktop mapping of vegetation communities and document the conditions of habitat for special status species including rare plants, burrowing owl (*Athene cunicularia*), desert tortoise (*Gopherus agassizii*), desert kit fox (*Vulpes macrotis arsipus*), and other sensitive biological resources.

Survey Results

Suitable habitat was present for all rare plants previously identified in the project's NEPA analysis, burrowing owl, desert tortoise, and desert kit fox. No burrowing owl, desert tortoise, or desert kit fox individuals or their sign (e.g., tracks, scat, burrows) were observed. No sensitive plants were observed

during the field survey although the survey was conducted outside of the blooming season. General wildlife and plant observations are included in (Attachment 3).

Table 1 Survey Data and Weather Conditions

Date	Time	Weather Conditions Beginning – End (°F)	Surveyors
August 11, 2025	0730-1445	89-109	Jose Lopez and Jack Quinzon
August 12, 2025	0730-1430	90-110	Jose Lopez and Jack Quinzon
August 13, 2025	0715-1120	88-110	Jose Lopez and Jack Quinzon

Vegetation Coverage

No sensitive vegetation communities are present near the proposed access road or 50-ft survey buffer. Vegetation communities and land cover types were refined as a result of observed conditions during the field verification surveys and included cheesebush – sweetbush scrub, creosote bush scrub, creosote bush – white bursage scrub, desert pavement, disturbed, and streambed (Attachment 1, Figures 1A-1J; Attachment 2, Photographs).

Creosote Bush Scrub

Creosote bush scrub is often found on alluvial fans, bajadas, minor intermittent washes. Soils are well drained, sometimes with desert pavement. Creosote bush is dominant or co-dominant in the shrub canopy with Shockley's goldenhead (*Acamptopappus shockleyi*), rayless goldenhead (*Acamptopappus sphaerocephalus*), white bursage, cheesebush (*Ambrosia salsola*), shadscale (*Atriplex confertifolia*), desert holly, allscale saltbush, woolly brickellbush (*Brickellia incana*), brittlebush (*Encelia farinose*), California Mormon tea (*Ephedra californica*), Nevada ephedra (*Ephedra nevadensis*) and water jacket (*Lycium andersonii*). Emergent trees may be present at low cover, including honey mesquite (*Prosopis glandulosa*) or Joshua tree (*Yucca brevifolia*). Approximately 13.46 acres of creosote bush scrub were observed during the field verification surveys.

Cheesebush – Sweetbush Scrub

Cheesebush – sweetbush scrub is often found in intermittently flooded channels, arroyos and washes, valleys, flats, rarely flooded low-gradient deposits. Soils are alluvial, sandy and gravelly, and disturbed desert pavement. Cheesebush, sweetbush bebbia (*Bebbia juncea*), wooly brickellbush and/or spiny senna (*Senna armata*) is dominant or co-dominant in the shrub canopy with silver cholla, brittlebush, California Mormon tea, Mojave rabbitbush (*Ericameria paniculata*), California buckwheat (*Eriogonum fasciculatum*), sticky snakeweed (*Gutierrezia microcephala*), white ratany (*Krameria grayi*), creosote bush, beavertail cactus (*Opuntia basilaris*), Thurber's sandpaper plant (*Petalonyx thurberi*), Schott's pygmycedar (*Peucephyllum schottii*), desert Christmas tree (*Pholisma arenarium*), Mexican bladdersage (*Salazaria mexicana*), desert purple sage (*Salvia dorrii*) and desert globemallow (*Sphaeralcea ambigua*). Emergent trees or tall shrubs may be present at low cover, including desert-willow (*Chilopsis linearis*), desert lavender (*Hyptis emoryi*), desert ironwood (*Olneya tesota*), blue palo verde (*Parkinsonia florida*), smoke tree (*Psorothamnus spinosus*) or catclaw (*Senegalia greggii*). Approximately 2.82 acres of cheesebush – sweetbush scrub were observed during the field verification surveys. This includes an additional survey buffer that was added to adjust for a shift in the access road (Figure 1E).

Creosote Bush – White Bursage Scrub

The herbaceous layer is absent to intermittent with seasonal annuals. The alliance is typically found in washes and rills, alluvial fans, bajadas, valleys, basins, upland slopes, mesas, and erosional highlands. The soils are well drained, alluvial, colluvial, sandy, sometimes underlain by a hardpan that may be calcareous, igneous and/or covered with desert pavement. White bursage and creosote bush are co-dominant in the shrub canopy with cheesbush, Fremont's chaffbush (*Amphipappus fremontii*), shadscale, desert holly, allscale saltbush, sweebush bebbia, California croton (*Croton californicus*), buckhorn cholla (*Cylindropuntia acanthocarpa*), branched pencil cholla, silky dalea, cotton top cactus, brittlebush, Virgin River brittlebush (*Encelia virginensis*), *Ephedra* spp., California buckwheat, *Krameria* spp., desert pepperweed (*Lepidium fremontii*), water jacket, (*Psorothamnus* spp.), Mexican bladdersage, spiny senna, Parish's goldeneye (*Viguiera parishii*), and Mojave yucca (*Yucca schidigera*). Emergent trees or tall shrubs may be present at low cover, including ocotillo or Joshua tree. Approximately 12.25 acres of creosote bush – white bursage scrub were observed during the field verification surveys.

Desert Pavement

Desert pavement is characterized as surfaces of closely packed angular and rounded rock fragments that form a mosaic in a matrix of fine sediment (sand, silt, and/or clay; United States Environmental Protection Agency, 2004). Desert pavement can cover areas ranging from a few square meters to hundreds of square kilometers. They occur mostly in sand-poor regions such as desert plains, on plateaus, in dry wadis and terraces, and on alluvial fans. Approximately 0.11 acre of desert pavement was observed during the field verification surveys.

Disturbed

Disturbed land cover was present during the field verification surveys (Attachment 1, Figures 1A-1J; Attachment 2, Photographs). This land cover type is not naturally occurring and is not described in either the Holland (1986) or Sawyer et al. (2009) classification systems. Disturbed portions of the proposed access road and 50-ft survey buffer include unpaved roads and graveled, disturbed soils from adjacent utility line, and compacted surfaces with little to no vegetation. Approximately 16.82 acres of disturbed land cover were observed during the field verification surveys.

Streambed

Streambed vegetation primarily consists of plants adapted to the stream environment rather than terrestrial plants. Streambeds are typically found within a channel or confined by banks and can be categorized by their material (sand, gravel, cobble, boulders) and the water velocity. The type of vegetation present can vary based on these factors and the overall stream ecosystem. Approximately 0.44 acre of streambed was observed during the field verification surveys.

Potential Road Impacts

Road Conditions

CL7682 and CL8847 are maintained east-west compacted dirt road. The access road is directly adjacent to an overhead/underground utility line with evidence of previous disturbance. The access road is between 13-ft and 25.3-ft wide.

Road Improvements

Repairs and Maintenance

Should heavy rains or other unforeseen circumstances wash out or disrupt portions of CL7682 or CL8847, the project would utilize native soil and/or imported gravel to fill and compact the dirt road. Depending on the severity of the repair, grading efforts and use of other erosion-control measures (such as riprap) may be added to strengthen the road. Regular maintenance is currently not anticipated to occur along the dirt access road. Access road minimization measures have been addressed below to limit any additional disruptions to the 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 road. This includes preconstruction surveys, special status species avoidance measures, and biological monitoring as applicable for vehicular travel along the access route.

Access Road Minimization Measures

In order to minimize impacts to adjacent habitat along both sides of the road, the following measures will be implemented while utilizing the access road for construction.

1) Documentation of road conditions: Prior to utilizing the access road, the contractor will document road conditions (via video) along proposed routes CL7682 and CL8847. The video should document existing road conditions including existing areas of disturbance. At the end of construction, any additional disturbances will be mitigated by the Project.
2) Traffic Control: In order to reduce potential for two-way traffic, a traffic control flagger will be placed at both ends of the proposed access road. The purpose of the flaggers will be to ensure one-way project related traffic at any one time.
3) Scheduled Delivery: In conjunction with Traffic Control, large equipment and delivery will be limited to occur within specific delivery times to ensure no project related vehicles are utilizing the road during delivery.
4) Designated and Delineated Turnouts: Multiple areas of disturbed soils and vegetation were identified within the proposed access road. Should turnout locations be required, they will be placed along previously disturbed vegetation. Turnouts will be limited to the minimum area required with a maximum area of 10-ft x 40-ft. Turnouts will be delineated prior to utilization.

Attachments

Attachment 1 Figures

Attachment 2 Photographs

Attachment 3 General Wildlife and Plant Observations

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).

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Attachment 1

Figures

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

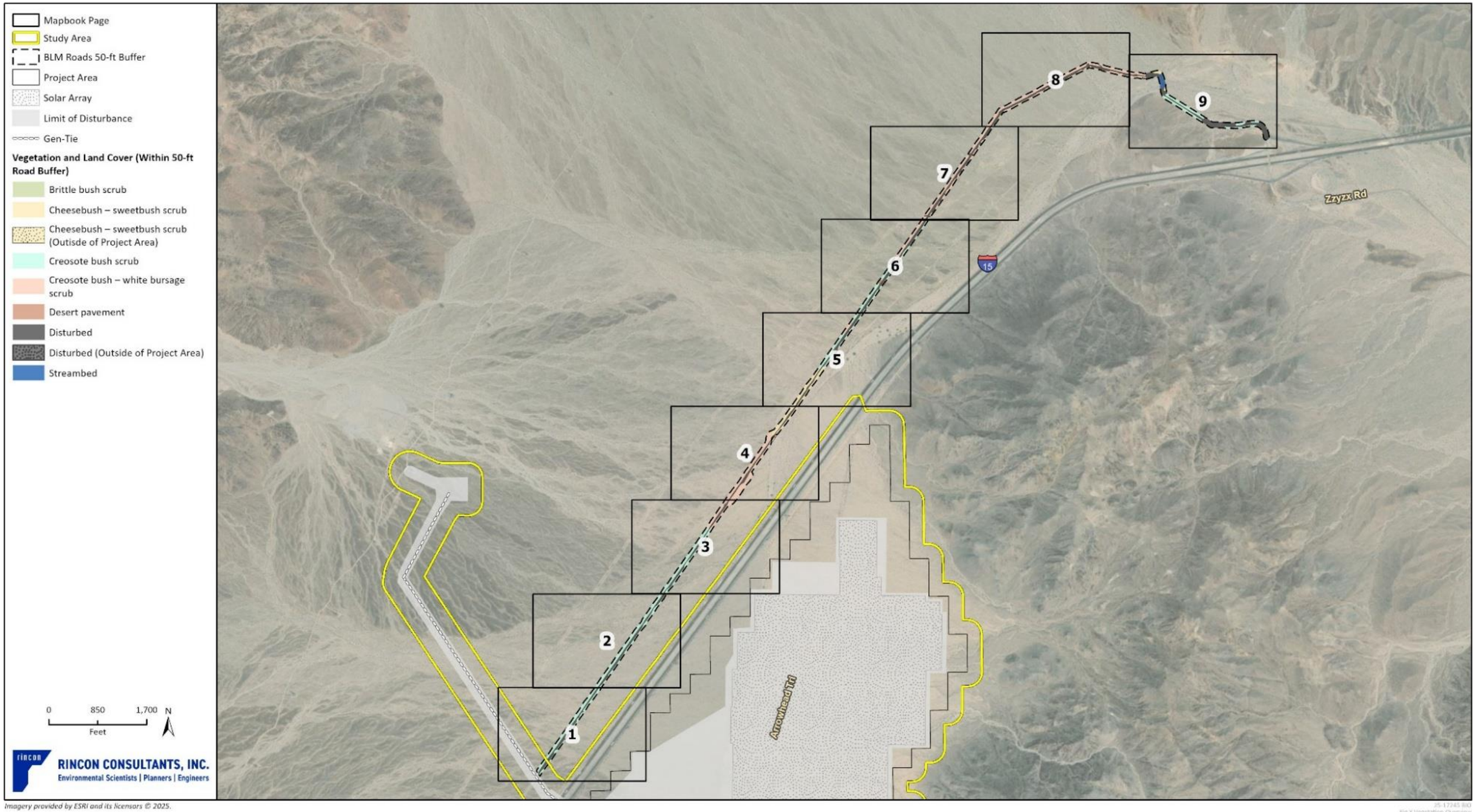

Figure 1B Proposed Access Road with 50-ft Review Buffer

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

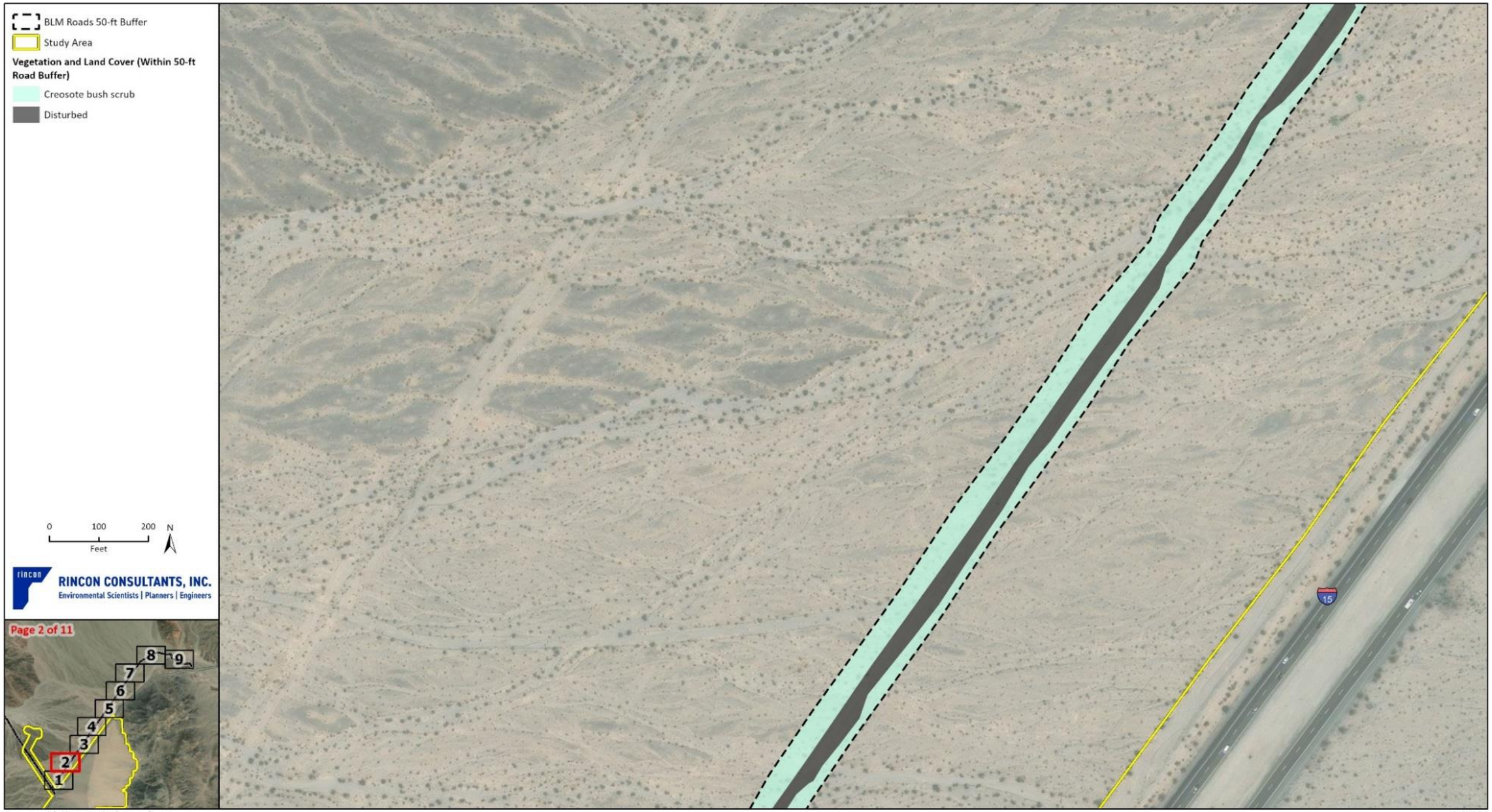

Figure 1D Proposed Access Road with 50-ft Review Buffer

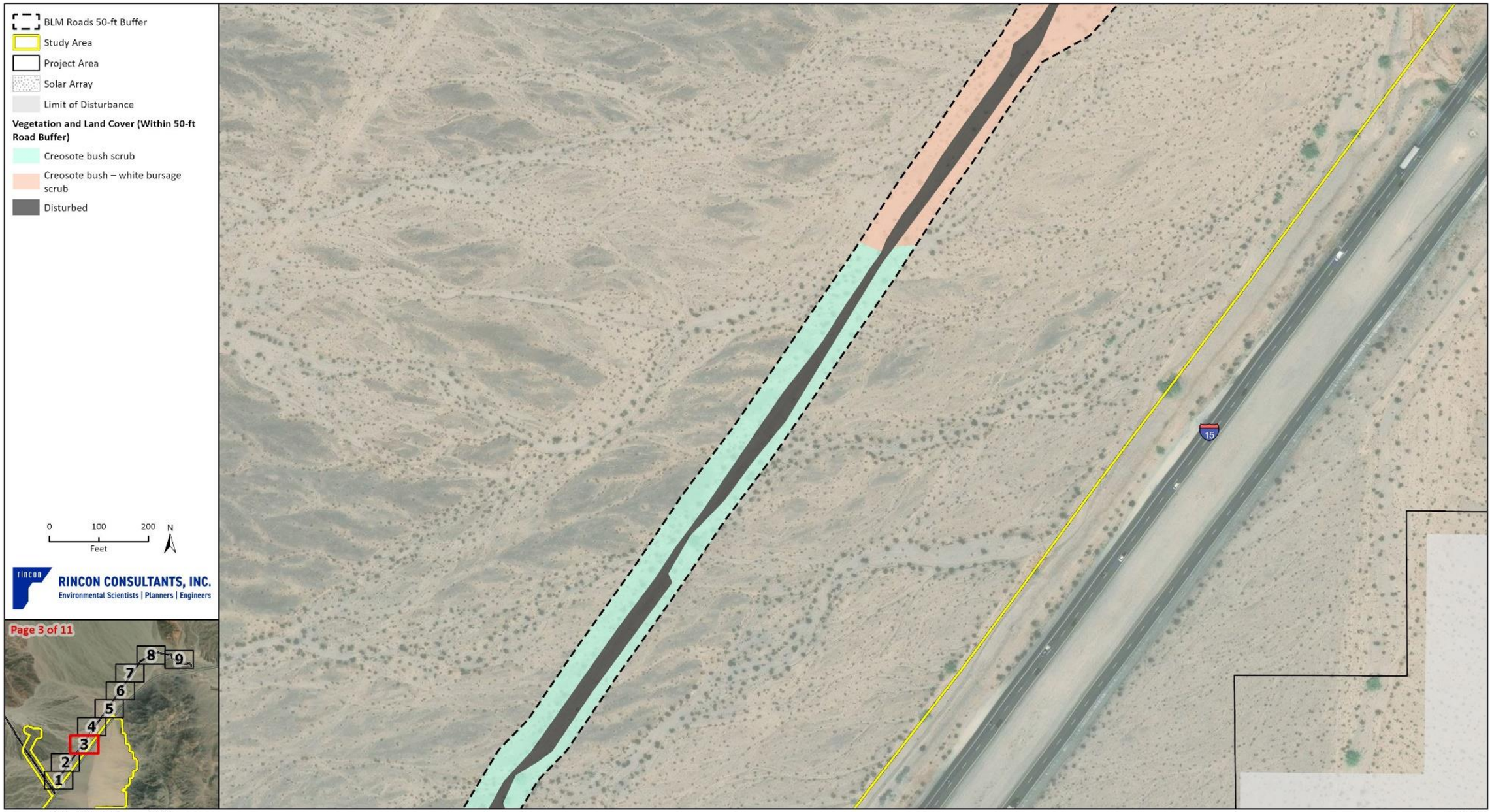

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Fig X Vegetation

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

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

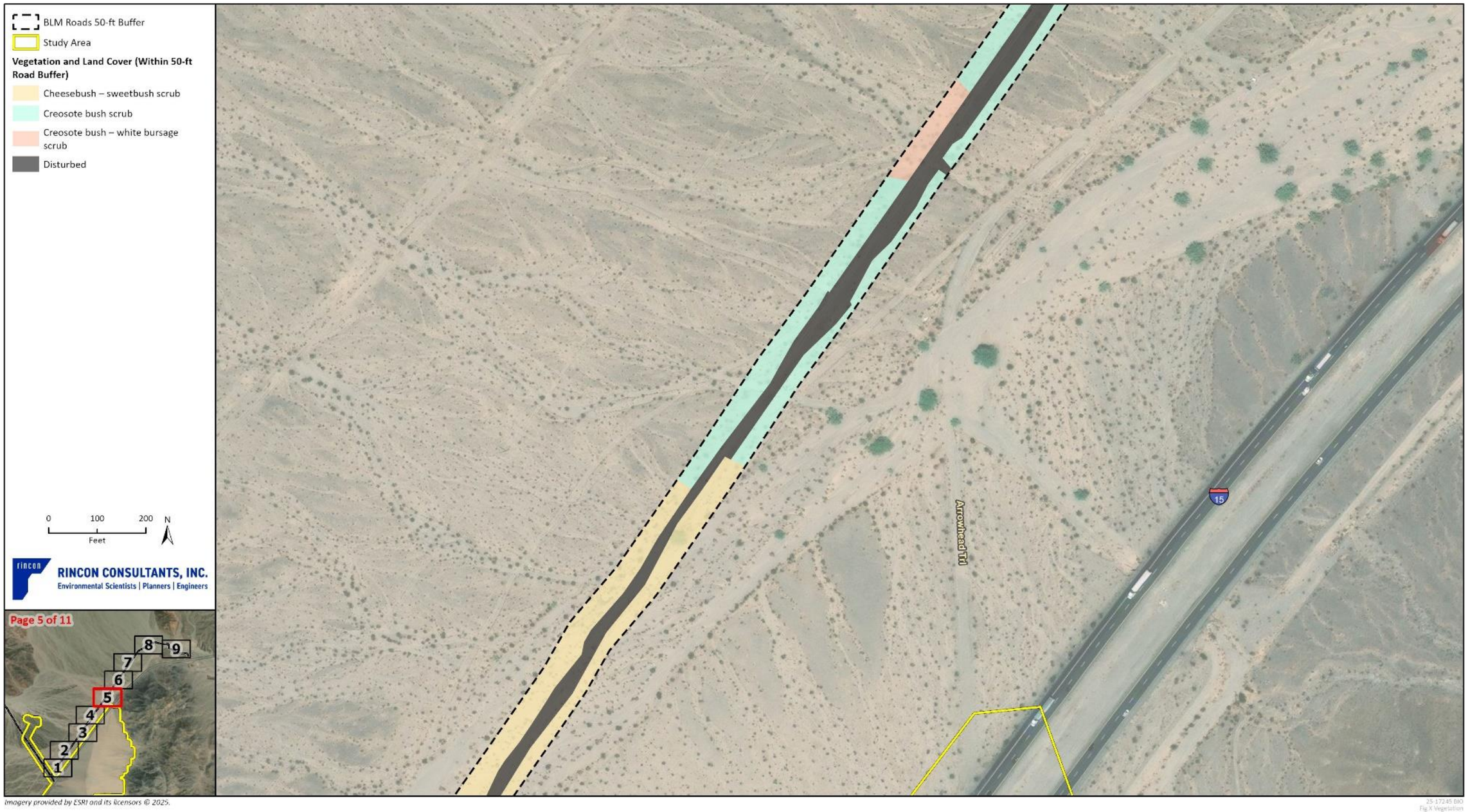

Figure 1G Proposed Access Road with 50-ft Review Buffer

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

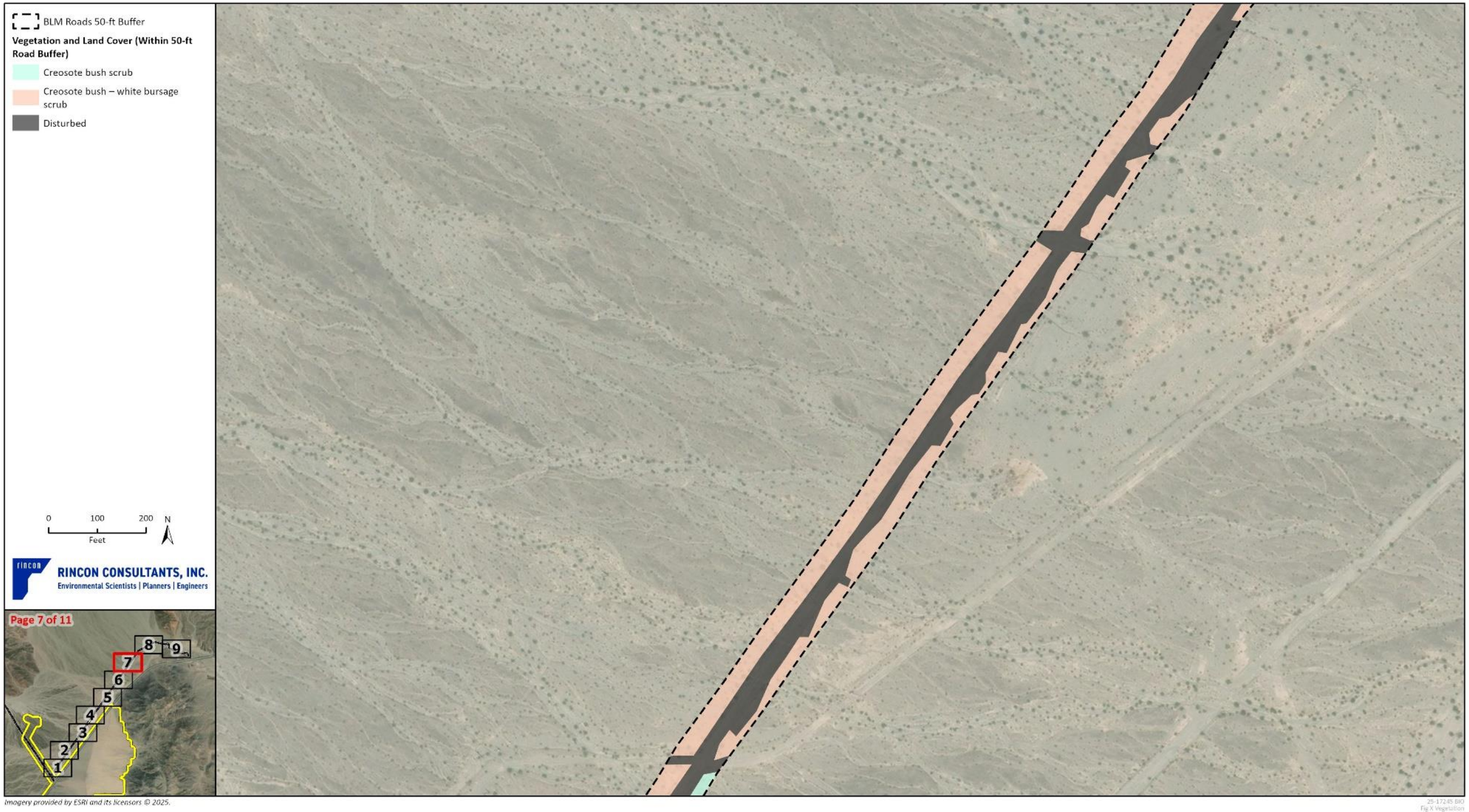

Figure 1l Proposed Access Road with 50-ft Review Buffer

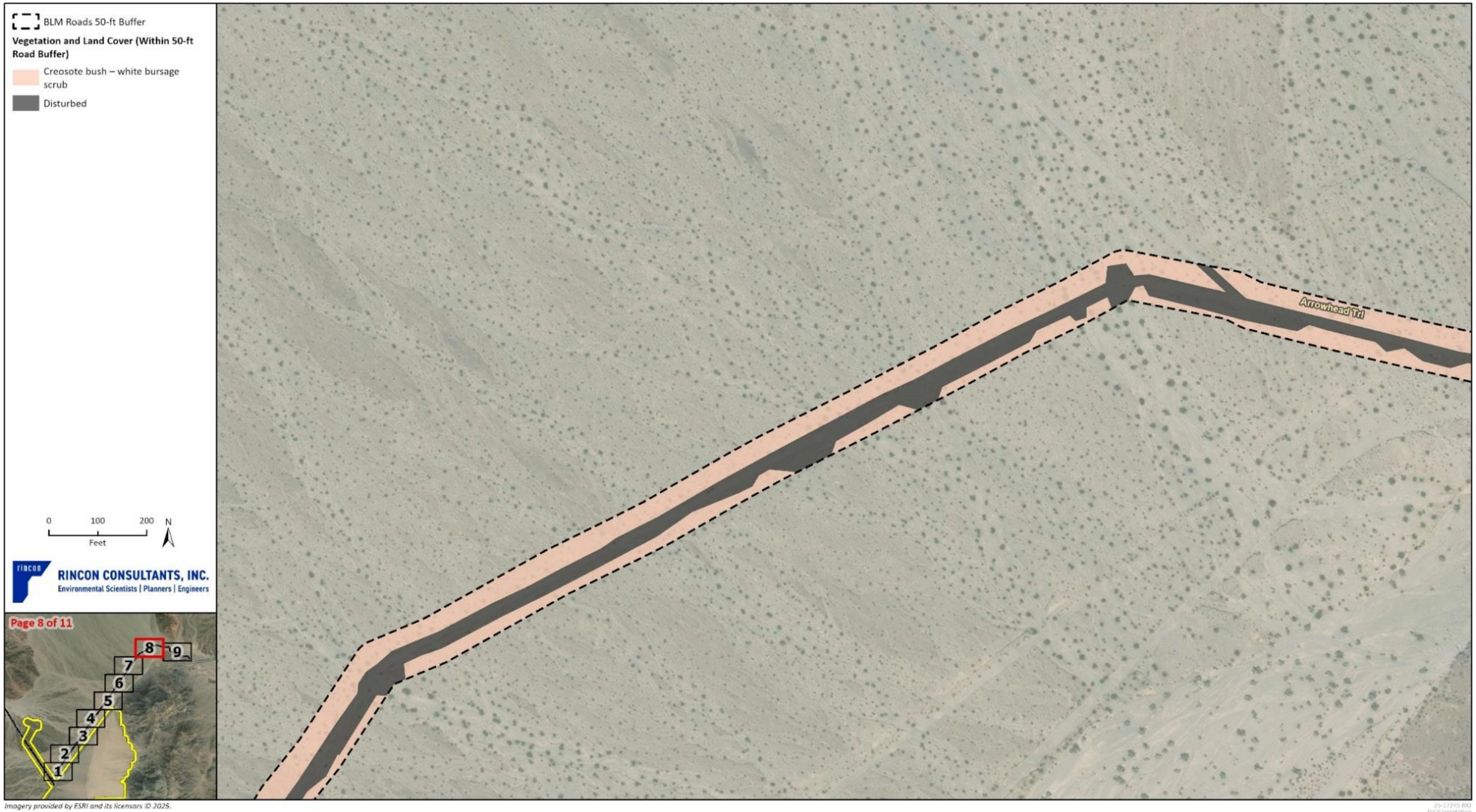

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Figure 1J Proposed Access Road with 50-ft Review Buffer

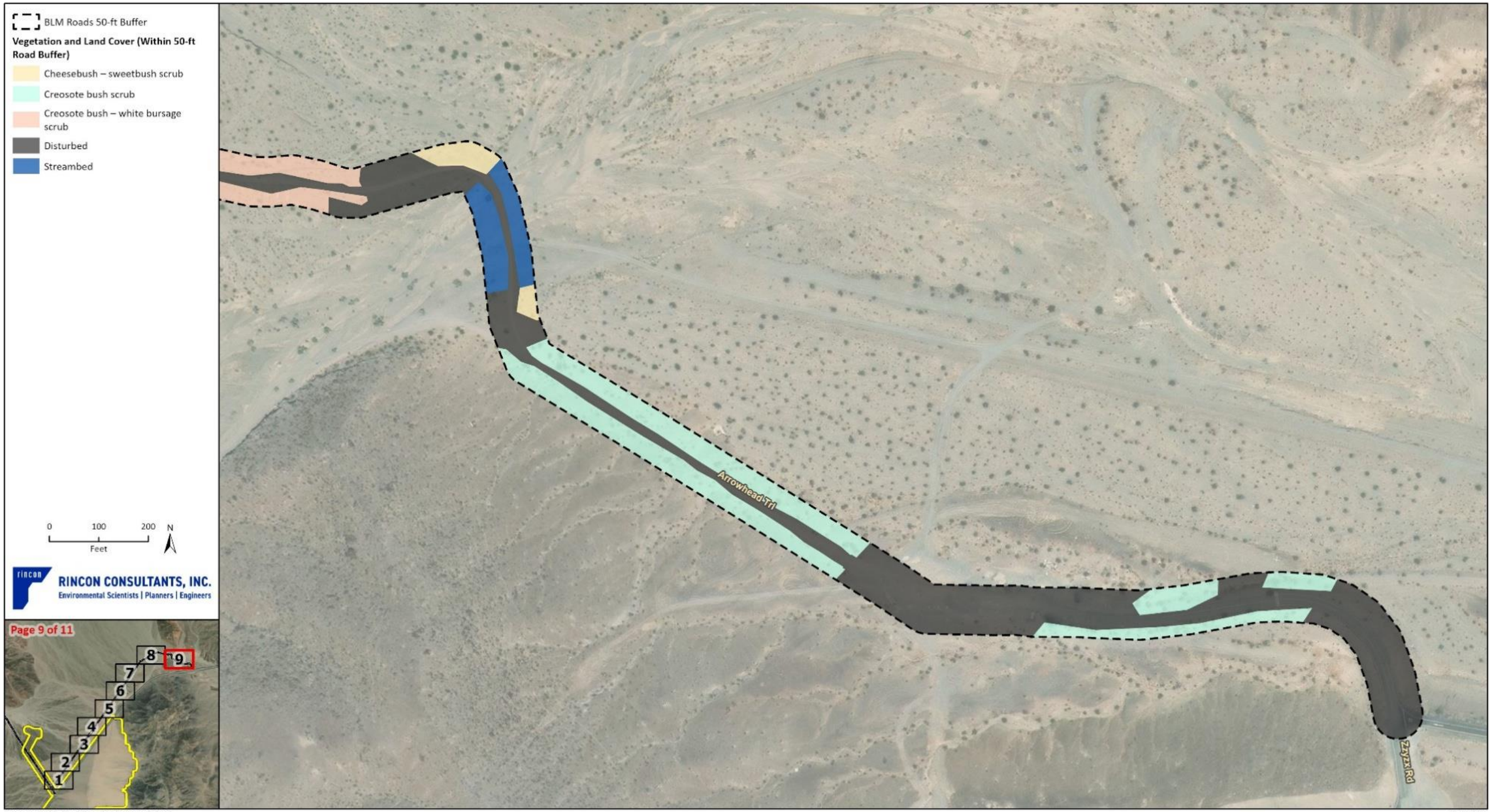

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Fig X Vegetation

Attachment 2

Photographs

Photograph 1. Photo showing streambed and disturbed vegetation/soil adjacent to access road near the northeastern portion. Photo taken facing south.

Photograph 2. Photo showing disturbed soil/vegetation adjacent to access road and creosote bush scrub near the northeastern portion. Photo facing south.

Photograph 3. Photo showing disturbed soil/vegetation adjacent to access road and streambed near the northeastern portion. Photo taken facing north.

Photograph 4. Photo showing disturbed land cover adjacent to access road near the northeastern portion. Photo taken facing west.

Photograph 5. Photo showing disturbed soil and vegetation adjacent to access road. Creosote bush – white bursage scrub near the northeastern portion. Photo taken facing northeast.

Photograph 6. Photo showing access road and creosote bush – white bursage scrub near the northeastern portion. Photo taken facing southwest.

Photograph 7. Photo showing access road and creosote bush – white bursage scrub near the northeastern portion. Photo taken facing northeast.

Photograph 8. Photo showing access road and creosote bush – white bursage scrub near the northeastern portion. Photo taken facing northeast.

Photograph 9. Photo showing disturbed vegetation/soils adjacent to access road and creosote bush scrub near the central portion. Photo taken facing southwest.

Photograph 10. Photo showing access road and cheesebush – sweetbush scrub near the southwestern portion. Photo taken facing northeast.

Photograph 11. Photo showing access road and creosote bush scrub with blue palos verde (*Parkinsonia florida*) near the southwestern portion. Photo taken facing northeast.

Attachment 3

General Wildlife and Plant Observations

General Wildlife Observations

Scientific Name	Common Name
Ammospermophilus leucurus	white-tailed antelope squirrel
Amphispiza bilineata	black-throated sparrow
Aspidoscelis tigris	western whiptail
Callisaurus draconoides	zebra tail lizard
Crotaphytus bicinctores	desert collared lizard
Lepus californicus	black-tailed jackrabbit
Myiarchus cinerascens	ash-throated flycatcher
Sayornis nigricans	black phoebe
Zenaida macroura	mourning dove

General Plant Observations

Scientific Name	Common Name
Ambrosia dumosa	white bursage
Ambrosia salsola	cheesebush
Atriplex hymenelytra	desert holy
Bebbia juncea	sweetbush
Cylindropuntia echinocarpa	silver cholla
Cylindropuntia ramosissima	pencil cholla
Encelia farinosa	brittlebush
Encelia virginensis	Virgin River brittlebush
Eriogonum inflatum	desert trumpet
Larrea tridentata	creosote bush
Opuntia basilar	beavertail cactus
Parkinsonia florida	blue paloverde
Petalonyx thurberi	sandpaper plant
Psorothamnus spinosus	smoke tree
Stephanomeria pauciflora	wire lettuce
Tidestromia suffruticosa	honeysweet

Attachment 2

Supplement to Appendix AA Determination of Infeasibility for DR BIO-20

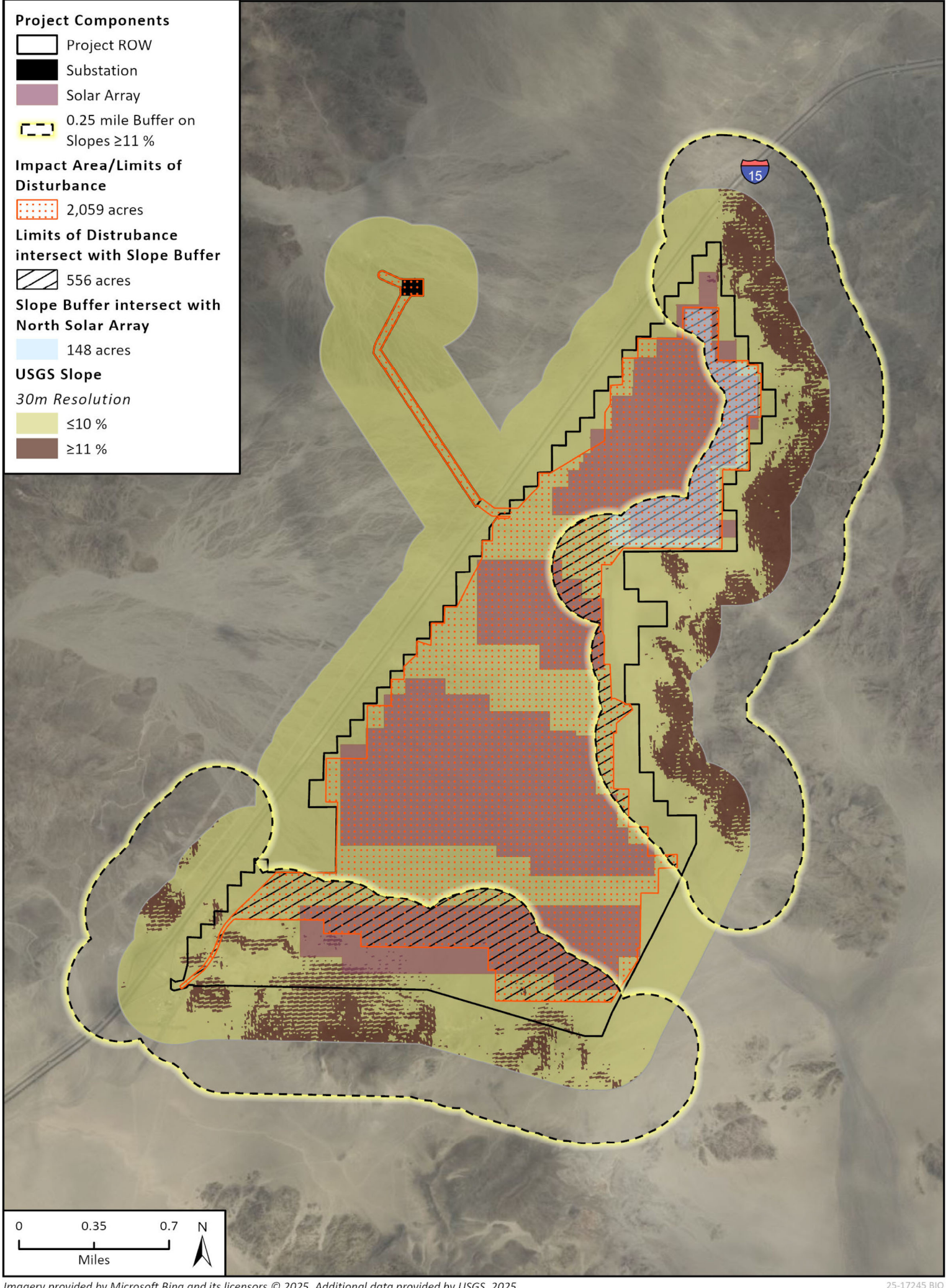

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Fig X Slope