

DOCKETED

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25-17245

Subject: Response to SDR BIO-1 Soda Mountain Solar Existing Offsite Proposed Well Location Assessment Project Site, San Bernardino County, California

This memo is a response to Attachment A Supplemental Notice of Preparation Data Requests, SDR BIO-1, to address biological resources and jurisdictional waters that have the potential to occur at the existing offsite proposed well located at 58502 Death Valley Road, Baker, California (35.306000°, -116.088450°).

SDR BIO-1

Staff has the following requests:

- a. Please provide a map showing the locations and land ownership of all proposed well locations.
- b. Please identify all access roads and or travel routes to gain access to these wells.
- c. Please provide the results of water quality testing for any existing wells.
- d. Please provide updated biological resource and jurisdictional waters data for any wells located outside of the existing project development footprint.

RESPONSE

- a. Please see Figure 1 showing the existing offsite proposed well location. The proposed well location is located within Assessor Parcel Number 0544-241-03 owned by a private citizen.
- b. Please see Figure 2 showing the access road and travel route to gain access to the existing offsite proposed well location. The proposed well location will only be accessed from State Route 127 north of Interstate 15. Access will only occur using the existing dirt access road on private property which is currently used for farm cultivation.
- c. The results of the water quality testing for the proposed well are included below.
- d. A desktop analysis addressing areas within 250 feet of the existing offsite proposed well location is included below.

Water Quality Testing and Results

The existing offsite groundwater well is located within the Silver Lake Valley groundwater basin (see Figure 3). The existing well (Well Completion Report No. WCR2020-016662) was permitted by San Bernardino County Department of Public Health, Environmental Health Services, Safe Drinking Water Permit Program. The well was drilled in September 2020 to a completed depth of 400 feet below ground surface (bgs) with screening from 160 to 400 feet. Static water level was recorded at 30 feet. Well yield was recorded at 400 gallons per minute (DWR 2025).

In January 2025, Title 22 water quality testing was conducted on the existing well (Well Completion Report No. WCR2020-016662) to evaluate water quality using the standard Title 22 analyte panel. Detected analytes are summarized in Table 1, with all other constituents below detection limits. None of the detected analytes exceeded applicable primary or secondary Maximum Contaminant Levels (MCLs or SMCLs). Title 22 water quality thresholds for specific conductance include two separate thresholds: a higher short-term threshold and a lower long-term threshold. The short-term threshold allows for brief fluctuations that might occur in water sources, whereas the long-term threshold is



designed to protect water quality over an extended period. The sample slightly exceeded the long-term SMCL for specific conductance by 100 µmhos/cm but remained below the short-term threshold (SWCA 2025b).

Table 1 Existing Well Detected Analytes Results

Detected Analyte	Result	Unit**	Title 22 MCL
Chloride	250	mg/L	500–1,500 (SMCL)
Nitrate as N*	4.2	mg/L	10
Sulfate	190	mg/L	250
Perchlorate	1.1	µg/L	6
Calcium	26	mg/L	Not specified
Iron	0.21	mg/L	Not specified
Magnesium	14	mg/L	Not specified
Potassium	9.5	mg/L	Not specified
Sodium	320	mg/L	Not specified
Aluminum	200	µg/L	1,000
Arsenic	4.2	µg/L	10
Barium	29	µg/L	1,000
Chromium	11	µg/L	50
Manganese	15	µg/L	50 (SMCL)
Selenium	2.9	µg/L	50
Vanadium	24	µg/L	Not specified
Zinc	21	µg/L	5,000
Total alkalinity as CaCO ₃	240	mg/L	Not specified
Bicarbonate alkalinity as CaCO ₃	240	mg/L	Not specified
Specific conductance	1,700	µmhos/cm	Upper: 1,600; Short term: 2,200
TDS	1,000	mg/L	1,000–1,500
Fluoride	1	mg/L	2,000
pH*	8.2	SU	6.5–8.5 (SMCL)

* Sample was received, prepped, or analyzed beyond the specified holding time for this parameter.

** mg/L = milligrams per liter; µg/L = micrograms per liter; µmhos/cm = micromhos per centimeter; SU = standard units

Source: SWCA Environmental Consultants. Water Supply Report for the Soda Mountain Solar Project, San Bernardino County, California. Appendix J Water Supply Report – February 2025 – Revision 1 (TN#261605).

Desktop Analysis

Literature Review

A desktop analysis and literature review were conducted using California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB; 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 within 250-ft of the existing offsite proposed well location. Attachment 1 illustrates vegetation mapped and jurisdictional aquatic features within 250 feet of the proposed well.



Vegetation Coverage

Developed

Approximately 8.75 acres of developed land cover was mapped per VegCAMP (Figure 4). This land cover type is not naturally occurring and is not described in either the Holland (1986) or Sawyer et al. (2009) classification systems. Developed portions of the proposed existing offsite proposed well location and 250-ft survey buffer include structures, unpaved and graveled roads, disturbed soils, and compacted surfaces with little to no vegetation associated with urban development.

Farm Cultivation

Approximately 3.16 acres of farm cultivation land cover was mapped per VegCAMP (Figure 4). This land cover type is not naturally occurring and is not described in either the Holland (1986) or Sawyer et al. (2009) classification systems. Farm cultivation is generally defined as land used for growing crops and raising livestock. The farm cultivation land cover was identified within the 250-ft survey buffer and includes an orchard.

Saltbush

VegCamp identified approximately 7.53 acres of saltbush (*Atriplex*) land cover adjacent to the proposed well location within the 250-ft survey buffer (Figure 4). The *Atriplex* alliances including *Atriplex canescens* Shrubland Alliance, *Atriplex polycarpa* Shrubland Alliance, and *Atriplex spinifera* Shrubland Alliance were combined into a Saltbush Complex in the *Central Mojave Vegetation Database* (Thomas et al., 2004). The *Atriplex* alliances occur in similar environments, often intermixing, and generally cannot be delineated as separate alliances except from the ground. One or more perennial species of *Atriplex* spp. dominate most alliances within the saltbush scrub collection of alliances. Saltbush is widespread and common in the Mojave Desert (Thomas et al., 2004).

Jurisdictional Aquatic Features

A desktop delineation used NWI, NHD, ESRI imagery (ESRI 2025a), and ESRI hillshade (ESRI 2025b) data to identify potential jurisdictional features within 250 feet of the proposed well location. One jurisdictional feature was identified within the 250-ft buffer and is displayed in Attachment 1, Figure 4. No impacts to this feature are proposed.

Sensitive Species

There are no special status-species documented in CNDDDB within 250 feet of the proposed well location within the last 50 years; however, all species identified in Section 3.4 of the draft EIR (SWCA 2025a) have potential to occur within suitable habitat adjacent to the proposed well.

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 October 2025).
- _____. 2025b. California Vegetation Classification and Mapping Program, VegCAMP. <https://wildlife.ca.gov/Data/VegCAMP> (accessed October 2025).
- California Department of Water Resources. 2025. Well Completion Report Map Application. <https://dwr.maps.arcgis.com/apps/webappviewer/index.html?id=181078580a214c0986e2da28f8623b37> (accessed October 2025).
- ESRI. 2025a. World Imagery.
- _____. 2025b. World Hillshade.
- Google Earth. October 2025.
- SWCA Environmental Consultants (SWCA). 2025a. Draft Soda Mountain Solar Project Biological Resources Technical Report, San Bernardino County, California. Section 3.4 Biological Resources.
- _____. 2025b. Water Supply Report for the Soda Mountain Solar Project, San Bernardino County, California. Appendix J Water Supply Report – February 2025 – Revision 1 (TN#261605).
- Thomas, K., T. Keeler-Wolf, J. Franklin, and P. Stine. 2004. Mojave Desert Ecosystem Program: Central Mojave Vegetation Database (accessed October 2025).
- United States Fish and Wildlife Service. 2025. National Wetland Inventory Data Mapper Available at: <https://www.fws.gov/wetlands/Data/Mapper.html> (accessed October 2025).
- United States Geological Survey (USGS). 2025. National Hydrography Dataset. Available at: <https://www.usgs.gov/national-hydrography/national-hydrography-dataset> (accessed October 2025).

Attachment 1

Figures

Figure 1 Proposed Well Location



Imagery provided by Microsoft Bing and its licensors © 2025.

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 Fig Y Baker Well

Figure 2 Access Roads to Proposed Well Site



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 Fig Y Baker Well and Access Routes

Figure 3 Project Site and Existing Groundwater Well Location

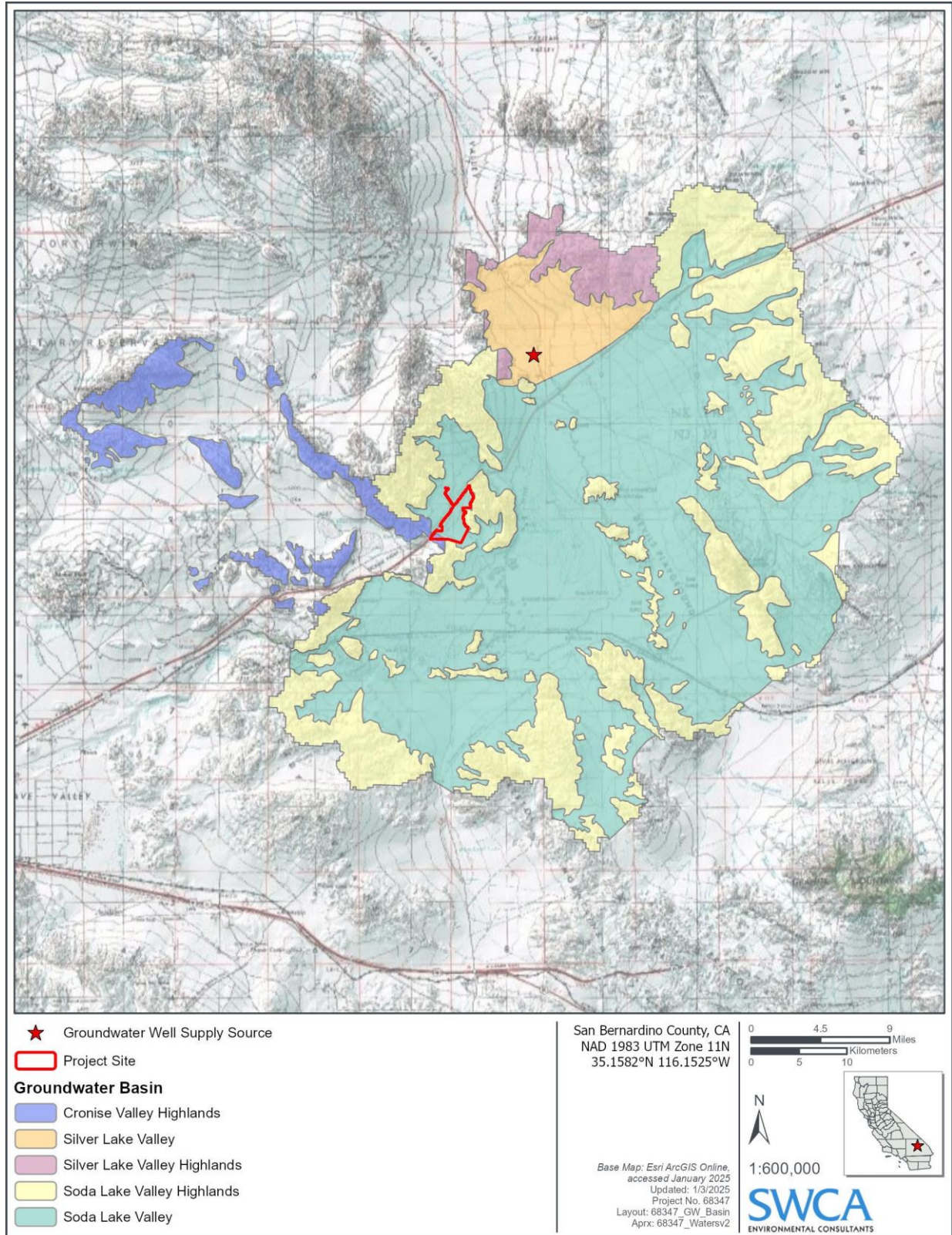
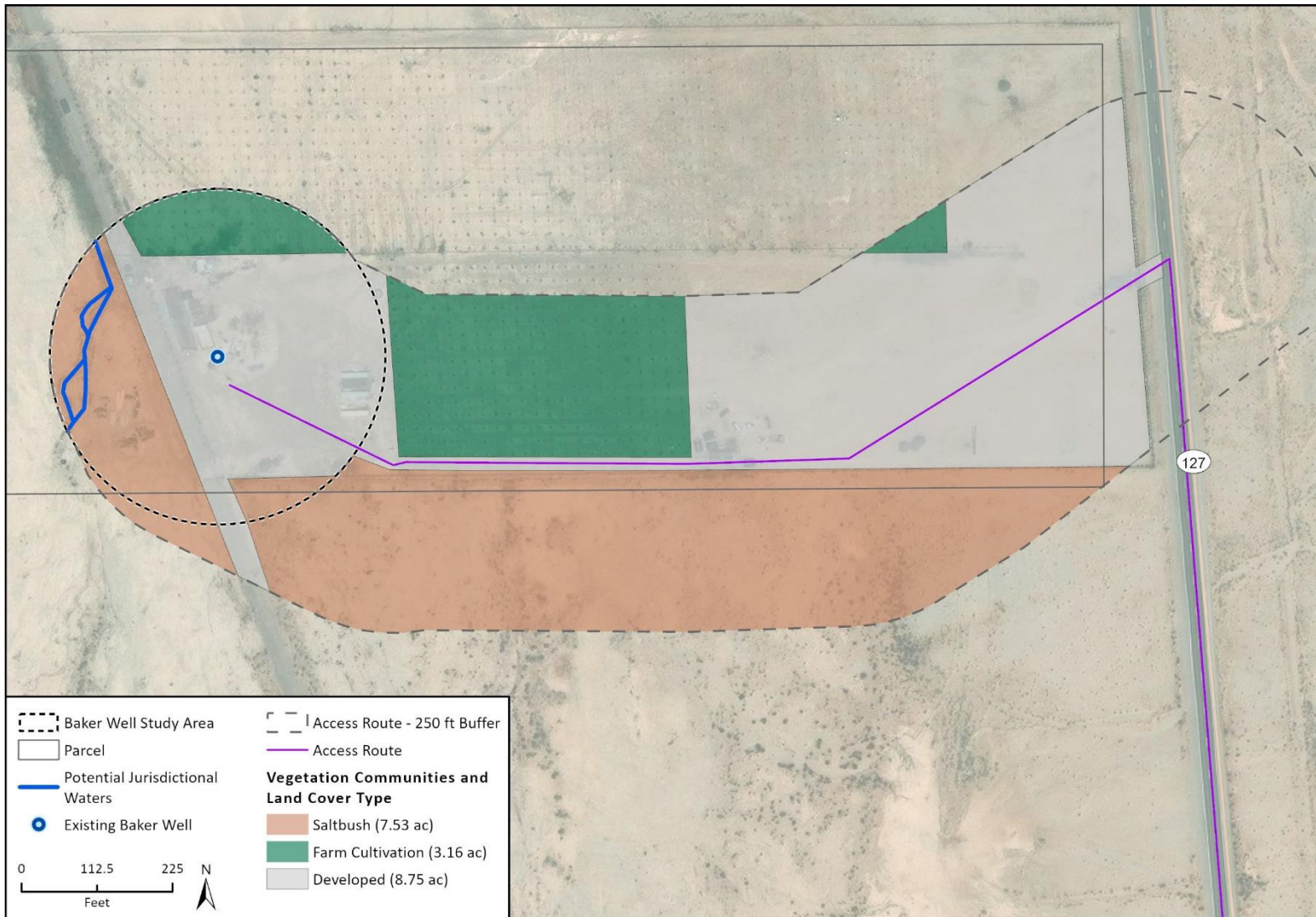


Figure 4 Land Cover and Jurisdictional Features of Proposed Well Site



Imagery provided by Esri and its licensors © 2025.
 Additional data provided by VegCamp, CDFW; 2025.

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 Fig Y Baker Well Vegetation