

**DOCKETED**

<b>Docket Number:</b>	24-OPT-03
<b>Project Title:</b>	Soda Mountain Solar
<b>TN #:</b>	268995
<b>Document Title:</b>	Response to CEC Email
<b>Description:</b>	This document provides a response to an email from the CEC dated March 5, 2026.
<b>Filer:</b>	Hannah Arkin
<b>Organization:</b>	Resolution Environmental
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	3/11/2026 8:39:30 AM
<b>Docketed Date:</b>	3/11/2026

## Thea Benson

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**From:** Thea Benson  
**Sent:** Tuesday, March 10, 2026 4:24 PM  
**To:** 'Hannah Arkin'; Marlyng Gama  
**Cc:** David Daitch; May Lau; Emily Gaston  
**Subject:** RE: [EXT] Fw: Soda Mountain Data Needs

Hannah,

Please see the following responses to data requests below. This email, and supporting information, will be provided in the following FTP Site shortly: [May 10 2026 Submittal](#).

### For Desert Tortoise and burrowing owls:

- Acres of all areas within the fenced portion of the arrays. Separate impacts for roads, berms, footings and any structures. For example, there are X acres in Y array. Of this acreage X acres would be permanently converted from the placement of roads, footings, berms, channels or other structures. Include the temporary disturbance areas required to construct the berm and channel (20 berm plus 20-foot channel will likely require up to 50-feet on either side of the berm/channel).

### Response:

- The table provided below includes a breakdown of impacts within the fenced portions of each array.

### Summary of Estimated Impacts within Each Fenced Solar Array

Solar Array	Estimated Impacts		
	Permanent	Temporary	Grand Total
<b>Fence - East Array</b>	<b>48.78</b>	<b>321.88</b>	<b>370.65</b>
BESS	28.17		28.17
Gentle 100 ft buffer		0.30	0.30
Guard Berm Ditch	2.00		2.00
Laydown	2.48		2.48
LOD		321.58	321.58
Road	16.13		16.13
<b>Fence - South Array 1</b>	<b>12.92</b>	<b>236.08</b>	<b>249.00</b>
LOD		236.08	236.08
Road	12.92		12.92
<b>Fence - South Array 2</b>	<b>27.29</b>	<b>656.75</b>	<b>684.04</b>
LOD		656.75	656.75
Road	27.29		27.29
<b>Fence - South Array 3</b>	<b>32.76</b>	<b>418.73</b>	<b>451.49</b>
Laydown	5.03		5.03
LOD		418.73	418.73
Road	27.73		27.73
<b>Grand Total</b>	<b>121.75</b>	<b>1,633.43</b>	<b>1,755.18</b>
<b>*Adjustment with Solar Array Footings</b>	<b>176.75</b>	<b>1,578.43</b>	<b>1,755.18</b>

\*Grand total adjustments to account for impacts associated with array footings, each footing estimated at approximately 1 square foot (CEC Docket TN3261587). Not calculated per array.

- Acreage associated with footings totals 55 acres between all Array locations. Total limit of disturbance for each pile installation is approximately 1 square foot per pile (CEC Docket TN#261587).
- Acres of lands that are located between the arrays that would not be subject to any project disturbance versus acres that would be crossed by equipment, buggies, etc. For example, there are X acres of lands located between the arrays. Of these Y acres would not be subject to project disturbance, and Z acres would be subject to disturbance from tracker crossing, or other vehicle use. I can likely reduce the mitigation ratios for areas where no project disturbance would occur even if they remained within the larger LOD.

**Response:**

- Although the only permanent feature in between arrays is a access road that runs north to south, the areas in between are anticipated to be impacted by installation of the fencing and associated equipment. All areas anticipated to be permanent disturbance.
- Provide applicant data for permanent impacts for the t-line, towers, road realignment, temp disturbance areas, etc.

**Response:**

- See information below associated with Waters.
- Please confirm there are no storm water basins as I observed in the latest JD.

**Response:**

- No storm water basins/ponds are included in Project B.

**For waters:**

- Please provide the same information and be clear on any permanent feature located in CDFW waters.
  - A revised project components list of temporary and permanent impacts associated to the project is provided in table below.

**Preferred Alternative Project B Components**

Alternative Project B Components	
Temporary Impacts	Permanent Impacts
Solar Array	Solar Array Footings
Gen-Tie 100-foot buffer	Gen-Tie Utility Pole and Lattice Tower Footings
Limits of Disturbance	Roads
	Laydown Yard
	BESS Yard
	Substation
	Switchyard
	Guard Berm Ditch
	Erosion Structure

- As a result of these revised temporary and permanent project components, impact calculations to state waters have been revised. Revised changes captured in this email, including the revised Table 6, and associated figures have been provided in a revised Aquatic Resources Delineation and Impact Analysis (Rincon 2026), specifically pages 14 and 15, and Figures 12(a-n). This replace the report previously included in CEC Docketed TN# 268847 (Attachment 2A), TN# 268846 (Attachment 2B), and TN# 268845 (Attachment 2C).

- Specifically, revisions to the impact assessment to state waters and associated figures capture the following information:
  - An additional 55 acres of permanent impacts within the solar array footprint has been included to account for individual solar array footings. This calculation was derived from the solar array impacts discussion provided in CEC Docket TN#261587 (Attachment 1: Nextracker Earthwork Summary Report). As a result of this addition to permanent impacts, a total of 55 acres was removed from the temporary impacts total. To be conservative, the 55 acres of permanent impacts within the solar array footprint is assumed to be situated within state waters.
  - A total of 0.006 acre of permanent impacts within the gen-tie corridor has been included to account for estimated individual utility pole and lattice tower footprints. This includes an estimated 11 tubular steel pole support and approximately 6 lattice towers, assuming an estimated 16-square foot footprint per structure. As a result of this addition to permanent impacts, a total of 0.006 acre was removed from the temporary impacts total. Source: Docket Number 24-OPT-03.
  - Removal of permanent impacts associated with stormwater ponds. Stormwater ponds are not proposed in Alternative Project B, however, were included in previous permanent impact calculations. These areas are located within the limits of disturbance, and have been quantified as temporary impacts where they intersect with state waters.
  - Additional permanent impacts were incorporated for the entire footprint of the BESS Facility rather than the footprint of the BESS structures because the area will be graded and unable to support flows through the facility.

With the incorporation of these changes, the result of the estimated impacts to waters for the preferred Alternative Project B, the information previously provided as Table 6 within the Aquatic Resources Delineation and Impact Analysis (Rincon 2026) has been revised, as follows (see table below).

**Table 6 Summary of Estimated Jurisdictional Aquatic Resource Impacts within the Project Site**

	Total Temporary Impact Area (acres)	Total Permanent Impact Area (acres)	State Waters (RWQCB and CDFW Jurisdiction)			
			Temporary Impacts		Permanent Impacts	
			Acres	Linear Feet	Acres	Linear Feet
Alternative Project B Impacts	2,029.56	185.10	1,026.80	1,026,206	117.67	56,405

Notes: No Wetlands or Other Waters of the U.S. or Wetland Waters of the State were determined to be present in the Study Area.

- Please also provide the acreage of any waters impacted by the berm and channel. Include the temp disturbance areas needed to support that work.

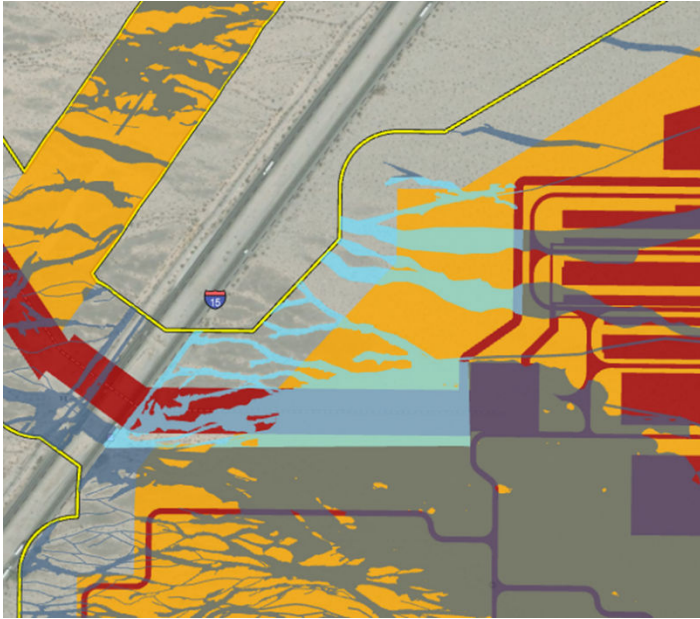
**Response:**

- See below
- Please identify the acres of waters that would be cut off from flow by the construction of the berm and channel. For example, construction of the berm/channel will result in perm impacts to XX acres of and YY acres of temp impacts. In addition, the construction of the berm/channel will reduce surface flow to XXX acres of waters located downstream of the structure.

**Response:**

- A total of 15.2 acres of state waters may be cut off hydrologically downstream of the berm and ditch proposed around the BESS Facility. As shown in the screenshot below, a subset of

the 15.2 acres downstream of the berm and ditch are already accounted for in the total temporary and permanent impact acreages reflected in the table above; however, the 15.2 acres includes the entirety of the downstream waters, including areas outside the direct project impacts. Please see screenshot below highlighting the 15.2 acres downstream of the BESS Facility.



Thank you,

Thea



**Thea Benson**

Supervising Biologist/Project Manager

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**Out of Office Alert: March 27-31, 2026**

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**From:** Hannah Arkin <[hannah@resolutionenvironmental.com](mailto:hannah@resolutionenvironmental.com)>

**Sent:** Thursday, March 5, 2026 3:34 PM

**To:** Tory Walker <[Tory@trwengineering.com](mailto:Tory@trwengineering.com)>; Marlyng Gama <[mgama@rinconconsultants.com](mailto:mgama@rinconconsultants.com)>; David Daitch <[ddaitch@rinconconsultants.com](mailto:ddaitch@rinconconsultants.com)>

**Subject:** [EXT] Fw: Soda Mountain Data Needs

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Hi All,

Please also see below for some additional data requests.

Hannah Arkin

CEO  
Resolution Environmental  
[www.resolutionenvironmental.com](http://www.resolutionenvironmental.com)  
262 B Avenue, Coronado, CA 92118  
760-504-4109

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**From:** Worrall, Lisa@Energy <[Lisa.Worrall@energy.ca.gov](mailto:Lisa.Worrall@energy.ca.gov)>  
**Sent:** Thursday, March 5, 2026 3:32 PM  
**To:** Hannah Arkin <[hannah@resolutionenvironmental.com](mailto:hannah@resolutionenvironmental.com)>  
**Subject:** Fw: Soda Mountain Data Needs

Hi Hannah,

Please see the requests below. We also need the GIS shape files showing the stormwater infrastructure described in the Updated Hydrology Report (in particular, the berms and channel protecting the switchyard and BESS).

We will also need an updated project figure showing the updated stormwater features. See SA Figure 3-9.

Thanks,

Lisa Worrall

Senior Environmental Planner

CEQA Project Management Unit

Siting, Transmission and Environmental Protection Division (STEP)

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**From:** Chris Huntley <[Chuntley@aspenerg.com](mailto:Chuntley@aspenerg.com)>

**Sent:** Thursday, March 5, 2026 1:06 PM

**To:** Worrall, Lisa@Energy <[Lisa.Worrall@energy.ca.gov](mailto:Lisa.Worrall@energy.ca.gov)>; Crisp, Ann@Energy <[Ann.Crisp@energy.ca.gov](mailto:Ann.Crisp@energy.ca.gov)>; Knight, Eric@Energy <[Eric.Knight@energy.ca.gov](mailto:Eric.Knight@energy.ca.gov)>; Chang, Kaycee@Energy <[kaycee.chang@energy.ca.gov](mailto:kaycee.chang@energy.ca.gov)>; Jamison Miner <[jminer@aspenerg.com](mailto:jminer@aspenerg.com)>

**Subject:** Soda Mountain Data Needs

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Lisa,

In order to update the SA, assess changes to mitigation acreages and respond to all comments on the document, we need the following data to be submitted by the applicant. This data ensures that we are using their data rather than attempting to draw polygons on our end. We would like to be accurate.

For Desert Tortoise and burrowing owls:

- Acres of all areas within the fenced portion of the arrays. Separate impacts for roads, berms, footings and any structures. For example, there are X acres in Y array. Of this acreage X acres would be permanently converted from the placement of roads, footings, berms, channels or other structures. Include the temporary disturbance areas required to construct the berm and channel (20 berm plus 20-foot channel will likely require up to 50-feet on either side of the berm/channel).
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For waters:

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- Please identify the acres of waters that would be cut off from flow by the construction of the berm and channel. For example, construction of the berm/channel will result in perm impacts to XX acres of and YY acres of temp impacts. In addition, the construction of the berm/channel will reduce surface flow to XXX acres of waters located downstream of the structure.

Receiving this data in a timely fashion is essential to completing the document.

Best regards,

Chris



**Chris Huntley**

Executive Vice President

Director of Biological Resources

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