

DOCKETED

Docket Number:	24-OPT-03
Project Title:	Soda Mountain Solar
TN #:	269352-6
Document Title:	Staff Memorandum on Record of Proceedings_Attachment 5
Description:	Admin Record - Part 5 of 5
Filer:	Ngoc Tran
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	3/27/2026 3:25:46 PM
Docketed Date:	3/27/2026

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SMSP02839	SMSP02840	Re: Figure 3-9	3/12/2026 12:25
SMSP02841	SMSP02842	RE: [EXTERNAL] Question about the role of Los Angeles Board of Water and Power Commissioners	3/11/2026 9:55
SMSP02843	SMSP02845	RE: [EXTERNAL] Question about the role of Los Angeles Board of Water and Power Commissioners	3/12/2026 11:39
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SMSP02848	SMSP02848	Fig 5 Alternative Project B Components.jpg	3/12/2026 12:23
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SMSP02850	SMSP02855	Fw: Meeting request for Soda Mountain- question about changes to project description	3/4/2026 12:36
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SMSP02859	SMSP02860	Soda Mountain new stormwater infrastructure	3/5/2026 16:58
SMSP02861	SMSP02861	Hold: Soda Mountain Briefing	3/10/2026 11:49

From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 12/16/2025 10:25:24 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
CC: mc.mca [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1dbd93b45ee4b03bfc0113e5ccfb9d9-989210f5-56]
Subject: Fw: Soda Mountain visual resources- figure question
Attachments: 68347_SodaMountainSolar_KOP 10 7-25 (1).pdf

Can you update Figure 3.1-3. Preliminary viewpoints and KOP simulation locations from 3-1 Aesthetics - Revision July 2025 to include KOP 10? Once you update and docket it, I can send Visual Resources to formatting.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Michael Clayton <mc.mca@comcast.net>
Sent: Tuesday, December 16, 2025 2:07 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Re: Soda Mountain visual resources- figure question

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Lisa,

Attached is the KOP 10 pdf.

Michael

On Dec 16, 2025, at 1:02 PM, Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov> wrote:

I just sent an invitation.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov
<Outlook-California.png>

From: Michael Clayton <mc.mca@comcast.net>
Sent: Tuesday, December 16, 2025 12:20 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Re: Soda Mountain visual resources- figure question

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

Just got out of a dental appointment. I can meet up if you still need to.

Michael

On Dec 16, 2025, at 10:58 AM, Worrall, Lisa@Energy
<Lisa.Worrall@energy.ca.gov> wrote:

Hi Michael, I would like to share my screen during a call to make sure I am selecting the correct figures to add to your section for the figures that are missing.

Thanks. Lisa

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: 224 095 171 908 21

Passcode: FG7c7pu3

Dial in by phone

+1 916-562-1816,,53327470# United States, Sacramento

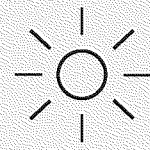
[Find a local number](#)

Phone conference ID: 533 274 70#

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

<Mail Attachment.ics>

Sun and Weather



Sunny

Date:

10-2-24

Photo Time:

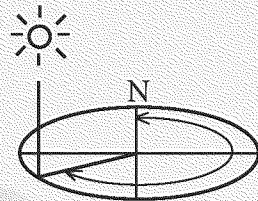
12:08 pm

Visibility:



Air Quality: **Good**

Sun Azimuth:



171.44°

Sun Angle:

49.56°

Lighting Angle on Project:

Side Lit

Wind:

0 mph

Cloud Cover:

0 %

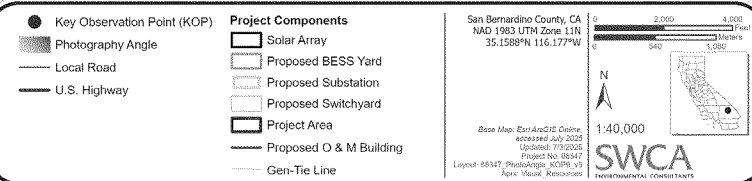
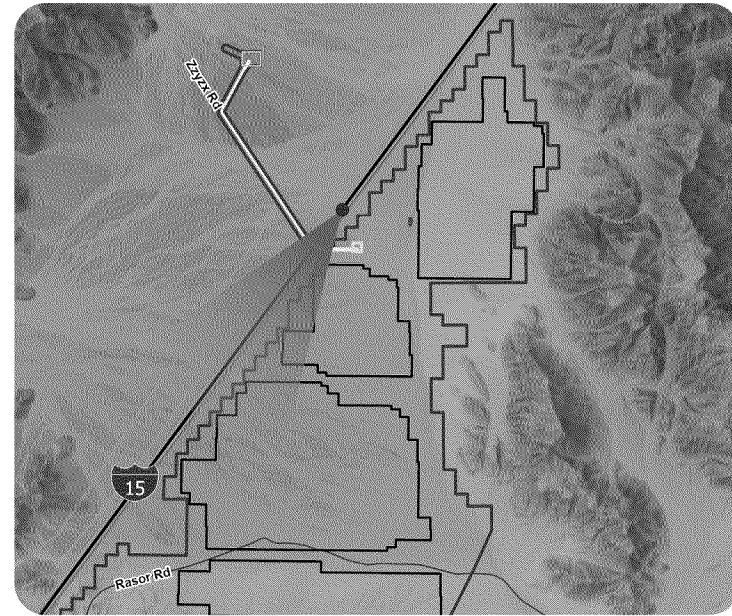
Temperature (°F):

93°F

Solar panels are represented at full tilt (60 degrees) facing east to reflect AM conditions. West-facing panels would be observed during PM conditions.

Simulation was prepared using information provided by client. Locations, colors, and heights may vary based on final engineering and design.

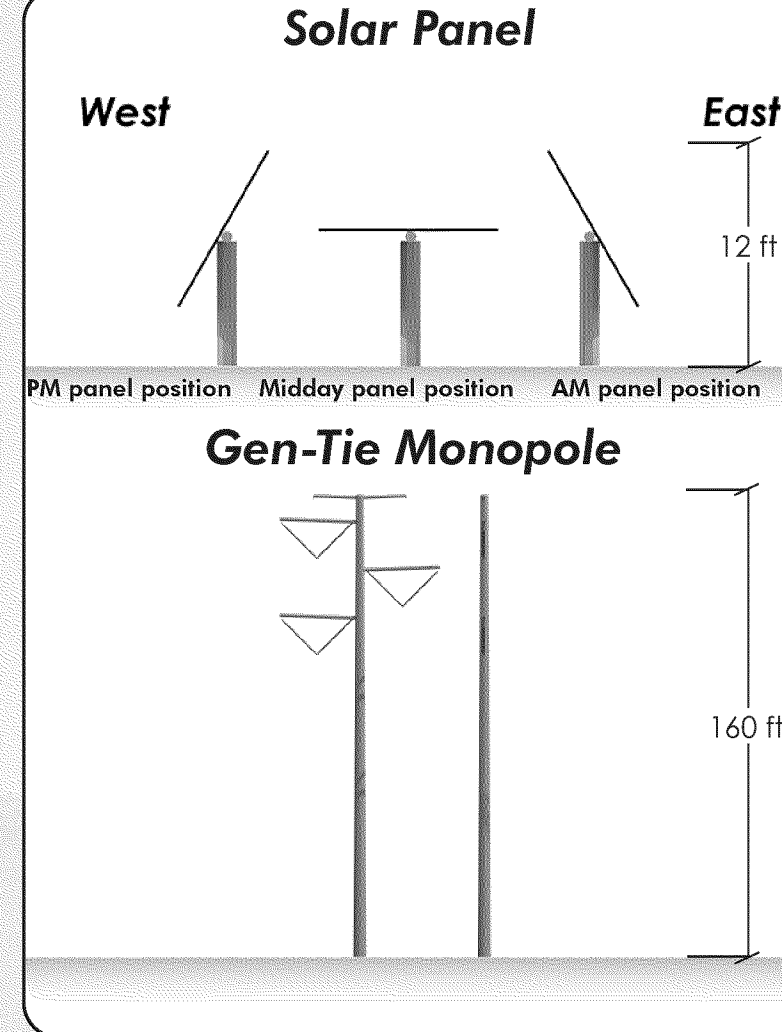
Soda Mountain Solar Project



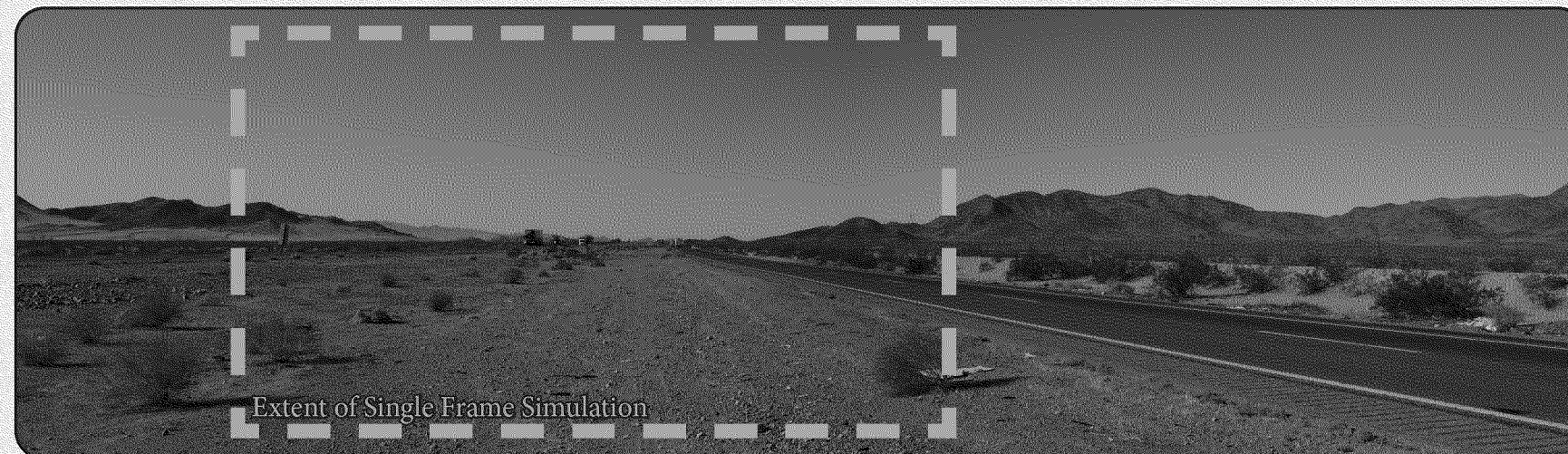
Approximate Distance to Nearest Transmission Pole:

0.25 mile

Project Location



Structure Diagram



Extent of Single Frame Simulation

KOP 10 - Interstate 15

Base Photographic Documentation

Latitude, Longitude (°):

35.1680, -116.1800

Viewpoint Elevation (feet): **1390**

Camera Height (meters): **1.5**

Camera Heading (degrees): **215**

Camera Make & Model: **Sony Alpha 7R IV**

Camera Sensor Size (mm): **35.7 x 23.8 Full Frame**

Crop Factor: **1**

Lens Make & Model: **Sony FE 50mm F2.5G**

Lens Focal Length (mm): **50**

Image Size (pixels): **6720 x 4480**

Single frame simulation approximates 50mm full frame equivalent.

Viewing Instructions: Printed at 100% the resulting simulation is 16 inches wide by 10 inches high. At this size and focal length, the simulation should be viewed at arms length (24 inches). If viewed on a computer monitor, scale should be 100%.

SWCA[®]
ENVIRONMENTAL CONSULTANTS



KOP 10: View from Interstate 15 looking southwest - Existing Condition



KOP 10: View from Interstate 15 looking southwest - Simulated Condition (Panels facing west)

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 12/5/2025 7:32:51 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Re: Soda Mountain- Operations at new LADWP switchyard

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

Our understanding is there will be zero workers at the switching station. Remote switching stations are not manned. Will have occasional preventative maintenance and inspection only. Quarterly/yearly and 4-6 employee maximum per visit.

Also - please drop O&M buildings to a maximum of 4,950sf rather than 5,000 sf.

Thanks!

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, December 3, 2025 4:18:22 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Soda Mountain- Operations at new LADWP switchyard

Hi Hannah,

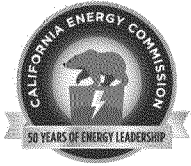
We are trying to get an estimate of the number of workers during operations that would be anticipated at the new utility switchyard, and how many, if any, delivery trips would occur for operation and maintenance purposes.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 12/9/2025 11:30:23 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Fw: Soda APMs/MMs
Attachments: SodaMtn_APM_MM_Summary 2025 1209.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

The mitigation summary for Soda Mt is attached.

Thanks!
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Resource	APM/Mitigation Measure Number	APM/Mitigation Measure	Cross Reference to ROD Measures
Aesthetics	APM AES-1	<p>Siting and Design. Visual design elements shall be integrated into the construction plans, details, shop drawings and specifications; these shall include, but not be limited to, grubbing and clearing, vegetation thinning and clearing, grading, revegetation, drainage, and structural plans. Visual design elements within the plans shall be measurable by size and monitored while under construction, while operational, and when decommissioned. Visual design elements to be integrated into construction plans, details, shop drawings and specifications must at a minimum include:</p> <ol style="list-style-type: none"> 1. Vary the grid layout to reduce contrast caused by long straight roads. Employ an offset in the grid layout to reduce visual contrast caused by long straight roads and, to the extent possible, arrays. The result shall be that no road extends from one side of the solar field to the other in a straight line. To further reduce contrast caused by exposing un-oxidized soils and rock in roadways, at select locations of concern from KOPs, spot applications of a product such as Permeon shall be used to dull and darken the ground plane in a short time. 2. Color treat structures to reduce contrasts with the existing landscape. The applicant shall treat surfaces of all permanent, large project structures and buildings (operations and maintenance building, inverters, electrical enclosures, gen-tie poles, conductors, tanks, pipes, and walls) and chain-link fences visible to the public such that: 	MM 3.18-1a

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

		<p>(a) their colors minimize visual intrusion and contrast by blending with (matching) the existing characteristic landscape colors; (b) their colors and finishes do not create excessive glare from surface brightness; and (c) their colors and finishes are consistent with local policies and ordinances. The transmission line conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive.</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

Aesthetics	APM AES-1	<p>Following consultation with the BLM Visual Resources specialist, and other representatives as deemed necessary, the applicants shall submit for the CDFW's and BLM's review, a specific Surface Treatment Plan that will satisfy these requirements. The consultation would be in-field at the agencies' election, or as a desktop review if preferred by the agencies. The treatment plan shall include:</p> <ul style="list-style-type: none"> a. A description of the overall rationale for the proposed surface treatment, including the selection of the proposed color(s) and finishes based on the characteristic landscape. Colors will be fielded tested using the actual distances from the KOPs to the proposed structures, using the proposed colors painted on representative surfaces; b. A list of each major project structure, building, tank, pipe, and wall; the transmission line towers and/or poles; and fencing, specifying the color(s) and finish proposed for each. Colors must be identified by vendor, name, and pantone number; or according to a universal designation system; c. One set of color brochures or color chips showing each proposed color and finish; d. A specific schedule for completion of the treatment; and e. A procedure to ensure proper treatment maintenance for the life of the project. The applicant shall not specify to the vendors the treatment of any buildings or structures treated during manufacture or perform the final treatment on any buildings or structures treated in the field, until the applicant receives notification of approval of the treatment plan by the BLM. Subsequent modifications to the treatment plan are prohibited without the BLM's approval for components under their respective authorities; however, the applicant may consider the 	MM 3.18-1a
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

		agencies' failure to respond to a request for review within 60 days an acceptance of the proposal.	
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Aesthetics	APMAES-1	<p>3. Lighting – Consistent with safety and security considerations, the applicant shall design and install all permanent exterior lighting and all temporary construction lighting such that (a) lamps and reflectors are not visible from beyond the project site, including any off-site security buffer areas; (b) lighting does not cause excessive reflected glare; (c) direct lighting does not illuminate the nighttime sky, except for required Federal Aviation Administration (FAA) aircraft safety lighting; (d) illumination of the project and its immediate area is minimized and it complies with local policies and ordinances. Prior to construction, the applicant shall submit to BLM and CDFW a Lighting Management Plan that outlines the following:</p> <p>a. Construction and operational (permanent) lighting – Except as required to meet safety and security requirements, there shall be no exterior nighttime lighting on the project site during the construction and operation periods. For these purposes, “nighttime” means the period of time between two hours after sunset until sunrise. To verify compliance with this measure, safety and security reasons that created the need for nighttime lighting shall be included in the log as well.</p> <p>b. Facility lighting – Lighting for facilities shall not exceed the minimum number, intensity, and coverage required for safety and basic security. Lighting shall be amber in color when accurate color rendition is not required. Use low-pressure sodium lamps or yellow LED lighting, or equivalent. No bluish-white lighting shall be used in permanent outdoor lighting.</p> <p>c. Lighting plan – Prior to construction, a lighting plan shall be prepared that documents how security and safety lighting will be designed and installed to minimize night-sky impacts during facility construction and operation. The lighting plan shall include the safety</p>	MM 3.18-1a
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		<p>and security reasons that require the need for all nighttime lighting on the facility during construction and operation periods. Lighting for facilities shall not exceed the minimum number of lights and brightness required for safety and security and shall not cause excessive reflected glare. Low-pressure sodium light sources shall be used to reduce light pollution. Full cut-off luminaires shall be used to minimize uplighting. Lights shall be directed downward or toward the area to be illuminated. Light fixtures shall not spill light beyond the project boundary. Lights in highly illuminated areas that are not occupied on a continuous basis shall be equipped with switches, timer switches, or motion detectors so that the lights operate only when the area is occupied. Wherever feasible, consistent with safety and security, lighting shall be kept off when not in use. The lighting plan shall include a process for promptly addressing and mitigating complaints about potential lighting impacts. The applicant shall submit the lighting plan to the BLM and CDFW for review and approval at least 30 days prior to construction.</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

Aesthetics	APM AES-1	<p>4. Vegetation and ground disturbance associated with access road construction, and distribution line installations shall be minimized and take advantage of existing clearings wherever feasible.</p> <p>5. Along all off-site access roads, all off-site distribution line corridors, and all internal access roads 16 feet or wider, graveled surfaces, areas to be permanently cleared of vegetation, and (if applicable) cut slopes shall be treated with rock stains or other color treatment appropriate with the surrounding landscape.</p> <p>6. Openings in vegetation for facilities, structures, and roads shall be feathered and shaped to repeat the size, shape, and characteristics of naturally occurring openings.</p> <p>7. The distribution line shall utilize non-specular conductors and non-reflective coatings on insulators.</p>	MM 3.18-1a
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Aesthetics	APMAES-2	<p>Construction. A pre-construction meeting with BLM landscape architects or other designated visual/scenic resource specialists shall be held before construction begins to coordinate on the mitigation strategy and confirm the compliance checking schedule and procedures. Final design and construction documents will be reviewed for completeness with regard to the visual mitigation elements, assuring that requirements and commitments are adequately addressed. The construction documents shall include, but not be limited to grading, drainage, revegetation, vegetation clearing, and feathering plans, and must demonstrate how VRM objectives will be met, monitored, and measured for conformance.</p> <ol style="list-style-type: none"> 1. The applicant shall reduce visual impacts during construction by clearly delineating construction boundaries and minimizing areas of surface disturbance; preserving existing, native vegetation to the extent feasible; utilizing undulating surface-disturbance edges; stripping, salvaging, and replacing topsoil; using contoured grading; controlling erosion; using dust suppression techniques; and restoring exposed soils to their original contour and vegetation. 2. Visual impact mitigation objectives and activities shall be discussed with equipment operators before construction activities begin. 3. Existing rocks, vegetation, and drainage patterns shall be preserved to the extent feasible. 4. Brush-beating or mowing or using protective surface matting rather than removing vegetation shall be employed where feasible. 5. Where not in conflict with other mitigation requirements, slash from vegetation removal shall be mulched and spread to cover fresh soil disturbances as part of the revegetation plan. Slash piles shall not be left in sensitive viewing areas. 6. If graveled surfaces are used during construction, the visual color 	MM 3.18-2
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		<p>contrast of graveled surfaces shall be reduced with approved color treatment practices.</p> <p>7. No paint or permanent discoloring agents shall be applied to rocks or vegetation to indicate surveyor construction activity limits.</p> <p>8. All stakes and flagging shall be removed from the construction area and disposed of in an approved facility.</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

Aesthetics	APM AES-3	<p>Operation and Maintenance. Terms and conditions for VRM mitigation compliance shall be maintained and monitored on an annual basis for the life of the project for compliance with visual objectives, adaptive management adjustments, and modifications listed below and as necessary and approved by the BLM landscape architect or other designated visual/scenic resource specialist. Minimum measures are as follows:</p> <ol style="list-style-type: none"> 1. The applicant shall maintain revegetated surfaces until a self-sustaining stand of vegetation which does not require supplemental water or fertilizer is re-established and visually adapted to the undisturbed surrounding vegetation. No new disturbance shall be created during operation without completion of a VRM analysis and approval by the BLM Authorized Officer. 2. Interim restoration shall be undertaken during the operating life of the project as soon as possible after disturbances. 3. Painted facilities shall be kept in good repair and repainted when color fades or flakes. 4. Color-treated solar panel backs/supports shall be kept in good repair and retreated when color fades and/or flakes. 	MM 3.18-3
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Aesthetics	APMAES-4	<p>APMAES-4: Decommissioning and Site Reclamation. A Decommissioning and Site Reclamation Plan, covering visual impact mitigation measures, shall be in place prior to construction, and reclamation activities shall be undertaken as soon as possible after disturbances occur and be maintained throughout the life of the project. The following decommissioning/reclamation activities/practices shall be implemented to partially mitigate visual impacts associated with solar energy development, where feasible:</p> <ol style="list-style-type: none"> 1. Pre-development visual conditions, and the B-Quality scenery, and integrity shall be reviewed, and the visual elements of form, line, color, and texture shall be restored to pre-development visual compatibility or to that of the surrounding landscape setting conditions, whichever achieves the better visual quality and most ecologically sound outcome. 2. A Decommissioning and Site Reclamation Plan shall be developed, approved by the BLM, and implemented. The plan shall require that all aboveground and near-ground structures be removed. Some structures shall be removed only to a level below the ground surface that will allow reclamation/restoration. Topsoil from all decommissioning activities shall be salvaged and reapplied during final reclamation. The plan shall include provisions for monitoring and determining compliance with the project's visual mitigation and reclamation objectives. 3. Soil borrow areas, cut-and-fill slopes, berms, water bars, and other disturbed areas shall be contoured to approximate naturally occurring slopes, thereby avoiding form and line contrasts with the existing landscapes. The applicant shall contour to a rough texture (i.e., use large rocks/boulders, grade uneven surfaces, and/or vegetation mulches/debris) in order to trap seed and to discourage off-road travel, 	MM 3.18-4
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		<p>thereby reducing associated visual impacts.</p> <p>4. A combination of seeding, planting of nursery stock, transplanting of local vegetation within the proposed disturbance areas, and staging of decommissioning activities enabling direct transplanting shall be utilized. Where feasible, native vegetation shall be used for revegetating to establish a composition consistent with the form, line, color, and texture of the surrounding undisturbed landscape.</p> <p>5. Stockpiled topsoil shall be reapplied to disturbed areas, and the areas shall be revegetated by using a mix of native species selected for visual compatibility with existing vegetation, where applicable, or by using a mix of native and non-native species if necessary to ensure successful revegetation. Gravel and other surface treatments shall be removed or buried.</p> <p>6. Rocks, brush, and vegetal debris shall be restored whenever possible to approximate preexisting visual conditions.</p> <p>7. Edges of revegetated areas shall be feathered to reduce form and line contrasts with the existing landscapes.</p>	
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Aesthetics	APM AES-4	8. A decommissioning VRM Monitoring and Compliance Plan shall be prepared by the applicant and approved by the BLM that establishes the schedule and terms for monitoring and the conditions and methods of measurement for determining compliance.	MM 3.18-4
Aesthetics	MM AES-5	<p>Glint and Glare Mitigation and Monitoring. Consistent with Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands (BLM 2013), the applicant shall prepare and submit to the BLM a Glint and Glare Mitigation and Monitoring plan identifies mitigation measures to reduce the potential health, safety, and visual impacts associated with glint and glare, and provides for monitoring of the effectiveness and maintenance of such measures. The goals of the mitigation shall be to ensure that glare with the potential for temporary after-image effects is not visible to drivers on I-15, and that glare visible from observation points does not exceed a cumulative total duration of 30 minutes per day. Mitigation measures to achieve these goals shall include, but not be limited to:</p> <ol style="list-style-type: none"> 1. Program solar tracker arrays contributing to glare to turn away from affected KOPs during the times of day when glare visible at that KOP is generated. 2. Use solar panels made with textured glass surfaces to diffuse reflected light. If the use of textured glass panels is found not to be feasible, the plan shall describe the reason for its infeasibility. 3. Employ materials to reduce the effect of glare where such materials would not result in greater adverse visual impacts than the glint or glare that would be offset and would not result in shading the solar panels. These materials may include fencing with privacy slats or 	MM 3.18-1b

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		<p>fabric screening of a BLM standard environmental color that is identified through a site study for color and texture selection and approved by the BLM, earthen berms, or vegetative screening.</p> <p>4. If glare with the potential for temporary after-image remains visible to drivers on I-15, coordinate with Caltrans to place signs warning drivers of the potential for hazardous glare.</p>	
Air Quality	APM AIR-1	The applicant shall use periodic watering for short-term stabilization of disturbed areas to minimize visible fugitive dust emissions. Use of a water truck to maintain surface moisture on disturbed areas and	APM 1

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		surface application of water during visible dusting episodes shall be considered sufficient to maintain compliance.	
Air Quality	APM AIR-2	The applicant shall apply best management practices (BMPs) to prevent project-related visible bulk materials transport (trackout) onto paved surfaces. BMPs may include, but not be limited to, the following: <ul style="list-style-type: none"> o Use of wheel-washers (or equivalent) installed at all access points and laydown areas where trackout onto paved public roads could occur. o Construction of stabilized construction site entrance/exit areas. o Implementation of regular street sweeping/cleaning of paved surfaces. o Installation of corrugated steel panels at all site exits. 	APM 2
Air Quality	APM AIR-3	The applicant shall cover haul vehicles maintained paved surfaces loaded with earthen materials while operating on publicly maintained paved surfaces.	APM 3
Air Quality	APM AIR-4	The applicant shall stabilize graded site surfaces upon completion of grading when subsequent development is delayed or expected to be delayed more than 14 days, except when such a delay is due to precipitation that dampens the disturbed surface sufficiently to eliminate visible fugitive dust emissions.	APM 4
Air Quality	APM AIR-5	The applicant shall cleanup project-related visible bulk materials transport (trackout) or spills on publicly maintained paved surfaces within 24 hours.	APM 5

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Air Quality	APM AIR-6	The applicant shall discontinue non-essential earth-moving activities under high wind conditions when wind speeds exceed 25 miles per hour and those activities result in visible dust plumes. All grading activities shall be suspended when wind speeds are greater than 30 miles per hour.	APM 6
Air Quality	APM AIR-7	The applicant shall limit the speed of vehicles traveling on unpaved roads and disturbed areas to 15 miles per hour.	APM 7
Air Quality	APM AIR-8	The applicant shall apply water to all unpaved roads and unpaved parking areas actively used during construction, except when moisture remains in the soils such that dust is not produced when driving on unpaved roads.	APM 8

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Air Quality	APM AIR-9	<p>The applicant, when entering into construction contracts or when procuring off road equipment or vehicles for on-site construction or operations and maintenance activities, shall ensure that only new model year equipment or vehicles are obtained. An Exhaust Emissions Control Plan that identifies each off-road unit’s certified tier specification, Best Available Control Technology, as well as the model year of all haul trucks to be used on the project that are under direct control of the applicant or its construction contractor shall be submitted to BLM for review and approval at least 30 days prior to commencement of construction activities. The following measures would be included with contract or procurement specifications and in the Exhaust Emissions Control Plan:</p> <ul style="list-style-type: none"> o All construction diesel engines not registered under California Air Resources Board’s Statewide Portable Equipment Registration Program, with a rating of 50 hp or higher shall meet the Tier 4 California Emission Standards for Off-Road Compression-Ignition Engines, as specified in 13 CCR 2423(b)(1), unless a good faith effort demonstrates that such engine is not available for a particular item of equipment. If a Tier 4 engine is not available for any off-road equipment larger than 50 hp, a Tier 3 engine shall be used or that equipment shall be equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides and diesel particulate matter to no more than Tier 3 levels unless certified by the engine manufacturers that the use of such devices is not practical for specific engine types. o All diesel-fueled engines used in the construction of the facility shall have clearly visible tags showing that the engine meets the standards of this measure. 	N/A

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		<ul style="list-style-type: none"> o All equipment and trucks used in the construction or operation and maintenance of the facility shall be properly maintained and the engines tuned to the engine manufacturer’s specifications. o All diesel heavy construction equipment shall not idle for more than 5 minutes. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. 	

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Biological Resources	APM BIO-1	The site shall be revegetated after decommissioning according to the Final Closure Plan described in MM BIO-29 and prepared in conformance with BLM requirements at the time of decommissioning.	APM 34
Biological Resources	APM BIO-2	The applicant shall prepare and implement a Vegetation Resources Management Plan that contains the following components: <ul style="list-style-type: none"> • Vegetation Salvage Plans that discuss the methods that will be used to transplant cacti present within the proposed disturbance areas. Salvage and transplant methods used will be approved by the CDFW. In addition, the Vegetation Salvage Plans will also include methods that will be used to transplant special-status plant species that occur within proposed disturbance areas. • Restoration Plans discussing the methods that will be used to restore any of the four native plant community types (creosote bush-white bursage scrub, cheesebush scrub, and creosote bush scrub,) present within the project area that may be temporarily disturbed by construction activities. The applicant will obtain CDFW approval for any seed mixtures used for restoration. • Vegetation Salvage and Restoration Plans that will specify success criteria and performance standards. The applicant will be responsible for implementing the Vegetation Salvage and Restoration Plan according to CDFW requirements. 	APM 36
Biological Resources	APM BIO-3	Herbicides shall not be applied systemically over the entire project area. Herbicides shall be applied in focused treatments in areas where invasive weed infestations have been identified, such as where there is a clump or monotypic stand of invasive weeds. Herbicides shall not be applied within 100 feet of a special-status plant.	APM 38

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Biological Resources	APM BIO-4	Only a State of California and federally certified contractor (i.e., Qualified Applicator), who is also approved by CDFW, and holds and maintains a Qualified Applicator License from California Department of Pesticide Regulation, shall be permitted to perform herbicide applications. Herbicides shall be applied in accordance with applicable laws, regulations, and permit stipulations. All herbicide applications must follow U.S. Environmental Protection Agency label instructions.	APM 39
Biological Resources	APM BIO-5	Herbicides shall not be applied during rain events, within 48 hours of a forecasted rain event with a 50% or greater chance of precipitation, or when wind velocity exceeds 10 mph (for liquids) and 15 mph for granular herbicides.	APM 40
Biological Resources	APM BIO-6	The applicant shall implement an Integrated Weed Management Plan (IWMP) to control weed infestations and the spread of noxious weeds in the study area.	APM 50
Biological Resources	APM BIO-7	After project construction, areas of temporary disturbance shall be closed and the restoration measures in the Vegetation Resource Management Plan shall be implemented.	APM 53
Biological Resources	APM BIO-8	Foundations shall be removed to a minimum of 3 feet below surrounding grade during decommissioning and covered with soil to allow adequate root penetration for native plants. Petroleum product leaks and chemical releases shall be remediated prior to completion of decommissioning.	APM 64
Biological Resources	APM BIO-9	Decommissioning methods shall minimize new site disturbance and removal of native vegetation.	APM 63

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Biological Resources	APM BIO-10	All special-status and rare plant (CRPR 1, 2, 3, and 4) occurrences within the project area will be documented during preconstruction surveys. The applicant will also provide a 100-foot buffer area surrounding each avoided occurrence in which no construction activities will take place, if feasible. If avoidance is not feasible, the applicant shall provide on-site mitigation (e.g., vegetation salvage) for impacts to special-status and rare plants.	APM 35
Biological Resources	APM BIO-11	Before construction of a given phase begins, the applicant shall stake and flag the construction area boundaries, including the construction areas for the solar arrays and associated infrastructure; construction laydown, parking, and work areas; and the boundaries of all temporary and permanent access roads. A CDFW-approved biologist shall then survey all areas of proposed ground disturbance for rare or special-status plant species and cacti during the appropriate period (blooming or otherwise identifiable) for those species having the potential to occur in the construction areas. All rare or special-status plant species and cacti observed shall be flagged for transplantation.	APM 35
Biological Resources	APM BIO-12	No vehicles or equipment shall be refueled within 100 feet of an ephemeral drainage or wetland unless a bermed and lined refueling area is constructed. Any vehicles driven and/or operated within or adjacent to drainages or wetlands shall be checked and maintained daily to prevent leaks of materials.	N/A
Biological Resources	APM BIO-12	The applicant shall implement a Worker Environmental Awareness Program (WEAP) to educate workers about the environmental issues associated with the project and the MMs that will be implemented at the site, including nest awareness and non-disturbance exclusion zones.	APM 44

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Biological Resources	APM BIO-13	<p>Preconstruction clearance surveys to identify active bird nests shall be conducted within 2 weeks of ground disturbance or vegetation removal in all active work areas during the breeding season (February 1–August 31). The work area will need to be resurveyed following periods of inactivity of 2 weeks or more. Active nests shall be avoided using non-disturbance buffer zones as shown below.</p> <ul style="list-style-type: none"> • Avian Awareness and Baseline Non-Disturbance Buffer Zones • Starting Distance of Awareness or Type Non-Disturbance Exclusion Zones Passerines 300 feet from active nest Raptors 500 feet from active nest Golden Eagles 1 mile and line of sight from active nest Burrowing 250 feet from active burrows during nesting Owls 1 season (February 1–August 31) 160 feet from active burrows during the wintering period (September 1–January 31) • Implementation Notes: A qualified biologist may reduce or increase the buffer distance if there is sufficient evidence based on species, habitat, and other factors, that applicant activity would not impact nesting activity. Buffers would be maintained until a qualified biologist has determined that the nest is no longer active. 	APM 46

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<p>Biological Resources</p>	<p>APM BIO-14</p>	<p>Monitoring of any active nests within or adjacent to the work areas shall be conducted until nestlings have fledged and dispersed. Ongoing breeding-season monitoring of work areas shall be conducted throughout the duration of construction. Nest monitoring results shall be recorded in a Nest Check Form. Typically, a nest check will have a minimum duration of 30 minutes, but it may be longer or shorter, or more frequent than one check per day, as determined by the Designated Biologist (see MM BIO-7 for Designated Biologist) based on the type of construction activity (duration, equipment being used, potential for construction-related disturbance) and other factors related to assessment of nest disturbance (weather variations, pair behavior, nest stage, nest type, species, etc.). The Designated Biologist shall record the construction activity occurring at the time of the nest check and note any work exclusion buffer in effect at the time of the nest check. Non-project activities in the area should also be recorded (e.g., adjacent construction sites, roads, commercial/industrial activities, recreational use, etc.). The Designated Biologist shall record any sign of disturbance to the active nest, including but not limited to parental alarm calls, agitated behavior, distraction displays, nest fleeing and returning, chicks falling out of the nest or chicks or eggs being predated as a result of parental abandonment of the nest. Should the Designated Biologist determine project activities are causing or contributing to nest disturbance that might lead to nest failure, the Designated Biologist shall coordinate with the Construction Manager to limit the duration or location of work, and/or set other limits related to use of project vehicles and/or heavy equipment. Nest locations, project activities in the vicinity of nests, and</p>	<p>APM 47</p>
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		<p>any adjustments to buffer areas shall be described and reported in regular monitoring and compliance reports.</p>	
<p>Biological Resources</p>	<p>APM BIO-15</p>	<p>Preconstruction surveys for burrows containing suitable bat roosting habitat that could be used as individual bat roosts shall be conducted in all project work areas.</p>	<p>APM 48</p>

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Biological Resources	APM BIO-16	The connection from the substation to the transmission line shall be designed to meet the most recent Avian Power Line Interaction Committee guidelines to the extent practicable.	APM 49
Biological Resources	APM BIO-17	Roads, power lines, fences, and other infrastructure associated with the project shall be minimized to reduce habitat loss. Fencing will use wildlife compatible design standards.	APM 51
Biological Resources	APM BIO-18	Collector lines shall be placed underground to reduce avian collisions.	APM 52
Biological Resources	APM BIO-19	Federal and state measures for handling toxic substances shall be followed to minimize danger from spills to water and wildlife resources. Facility operators shall maintain Hazardous Materials Spill Kits on-site. Personnel shall be trained to use the Hazardous Materials Spill Kits.	APM 54
Biological Resources	APM BIO-20	The applicant shall clear vegetation outside of the bird breeding season to the maximum extent practicable. Preconstruction avian clearance surveys shall be conducted by a qualified biologist for vegetation clearing during the bird breeding season (February 1– August 31). If a nest(s) is identified in the preconstruction avian clearance surveys, a qualified monitor shall be on-site during vegetation removal in order to enforce non-disturbance buffers and stop activities as necessary should construction disturb nesting activity.	APM 55
Biological Resources	APM BIO-21	Trash shall be disposed of in covered containers and regularly removed from the site.	APM 56

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Biological Resources	APM BIO-22	Surveys for burrowing owl shall be conducted in suitable burrowing owl habitat prior to construction and if construction is suspended for 2 weeks or more. Surveys shall be performed pursuant to the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). If active burrows are found, they shall be avoided using non-disturbance buffer zones. Passive relocation shall be used as described above once the burrow is determined to be inactive.	APM 57
Biological Resources	APM BIO-23	A qualified biologist shall conduct a ground-based golden eagle clearance survey for active golden eagle nests in a 2-mile area surrounding the project, as accessible. Golden eagle clearance surveys shall be conducted annually for each year of construction during the golden eagle nesting season. If active nests are found in the study area, the applicant shall coordinate with BLM, USFWS, and CDFW to ensure that construction does not result in disturbance of the golden eagles.	APM 58
Biological Resources	APM BIO-24	Project personnel shall remove and dispose of roadkill near the study area to avoid attracting raptors and other scavengers to the site and shall regularly remove vegetation around larger facilities (such as the substation) to reduce raptor foraging.	APM 60
Biological Resources	APM BIO-25	The project shall minimize the use of lighting that could attract migrating birds and bats (that could feed on concentrations of insects at lights). Lighting will be kept to the minimum level necessary for safety and security. High-intensity, steady burning, bright lights such as sodium vapor or spotlights will not be used on project facilities.	APM 61
Biological Resources	APM BIO-26	Project personnel and visitors shall be instructed to drive at low speeds (<15 mph) and be alert for wildlife, especially in low-visibility conditions.	APM 62

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Biological Resources	APM BIO-27	Fencing shall be removed at the completion of decommissioning.	APM 65
Biological Resources	APM BIO-28	<p>Desert tortoise exclusion fencing shall be installed at the perimeter of project construction areas (i.e., solar array areas, project buildings, substation/switchyard, earthen berms, and along the edge of access roads and collector line corridors). The fence locations will be determined during final design and will enclose areas of project activity. The fence line and a 30 foot-wide buffer shall be surveyed for desert tortoise before construction of the fence and according to USFWS protocol. Desert tortoise translocation will adhere to guidelines of the desert tortoise translocation plan for the project (see MM BIO-12). Tortoises found in the fence line study area or spotted within 50 m of the fence line study area shall be:</p> <ul style="list-style-type: none"> • Assigned a USFWS identification number. • Given a health assessment. • Fitted with a transmitter. Tortoises that are too small to accept a transmitter (i.e., no transmitter is available that is 10% or less of the tortoise’s body weight) shall be treated as a translocatee and held in situ. • Moved into habitat adjacent outside the fence line. The tortoise shall be moved into an empty burrow if clearance of the fence area takes place outside the tortoise active season (i.e., November–March and June–August). • Any of the moved tortoises that return to the project area before completion of fence construction shall be treated as translocatees. <p>Desert tortoises remaining outside the fence line prior to completion of the fence shall be deemed residents. The transmitter shall be removed</p>	APM 66



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from the resident tortoise, and no further action shall be taken for the resident tortoises. USFWS procedures shall be followed to clear and handle the desert tortoise.

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Biological Resources	APM BIO-29	The project area desert tortoise preconstruction clearance survey shall be conducted during the desert tortoise active season (April–May and September–October) unless otherwise agreed to by CEC, USFWS, and CDFW. The survey shall be conducted according to USFWS protocol and preferably during early morning hours to increase the chance juvenile tortoises are found, per the Guidelines. Any tortoise scat shall be collected on each pass of a transect, per the Guidelines. USFWS procedures shall be followed to clear and handle the desert tortoise.	APM 67
Biological Resources	APM BIO-30	The linear facilities desert tortoise preconstruction clearance survey(s) can be conducted at any time throughout the year. Linear facilities for this project include the buried collector lines between arrays and connecting to the substation. Located desert tortoises shall be undisturbed and allowed to clear the site without assistance or interference. Tortoises shall be moved if necessary to reduce the potential for harm from construction activities but shall not be moved more than 500 m in such a scenario. USFWS procedures shall be followed to clear and handle the desert tortoise.	APM 68

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<p>Biological Resources</p>	<p>APM BIO-31</p>	<p>Data shall be collected during desert tortoise clearance surveys as described in this section. The same data shall be collected again on tortoises held in the interim in situ on the day that the tortoise is translocated from the study area. The data include:</p> <ul style="list-style-type: none"> Date Time Temperature (°C) Project name Site type (project/recipient/control) Landowner (BLM) Permit/BO # Coverage # Field crew vendor Surveyor (first and last name) ID# Midline carapace length (MCL) (millimeters) Sex Universal Transverse Mercator (UTM) (Easting) UTM (Northing) Location (e.g., burrow) Transmitter manufacturer Transmitter serial # Transmitter frequency Transmitter install date Battery life (months) Status (alive/dead/lost) 	<p>APM 69</p>

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Biological Resources	APM BIO-32	Following installation of the desert tortoise exclusion fencing, the fencing shall be regularly inspected. Permanent fencing shall be inspected monthly and during and within 24 hours following all major rainfall events. A major rainfall event is defined as one for which flow is detectable within the fenced drainage. Any damage to the fencing shall be temporarily repaired immediately to keep tortoises out of the site, and permanently repaired within 72 hours between March 15 and October 31 and within 7 days between November 1 and March 14 of observing damage. Inspections of permanent site fencing shall occur while desert tortoise fencing is in place.	APM 70
Biological Resources	APM BIO-33	No construction, operation, or decommissioning activities shall occur in unfenced areas without a USFWS-approved desert tortoise biologist present. These activities include the construction phase (construction, revegetation), decommissioning phase, and maintenance activities during the operations phase that require new surface disturbance. An adequate number of trained and experienced monitors must be present during all construction and decommissioning activities in unfenced areas, depending on the various construction tasks, locations, and season. A biologist shall be on-site from March 15 through October 31 (active season) during ground-disturbing activities in areas outside the exclusion fencing, and shall be on-call from November 1 through March 14 (inactive season). The biologist shall check all construction areas immediately before construction activities begin. The biologist shall inspect construction pipes, culverts, or similar structures 1) with a diameter greater than 3 inches, 2) stored for one or more nights, 3) less than 8 inches aboveground, and 4) within desert tortoise habitat (i.e., outside the permanently fenced	APM 71

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		<p>area), before the materials are moved, buried, or capped. Alternatively, such materials may be capped before storing outside the fenced area or placing on pipe racks.</p>	
<p>Biological Resources</p>	<p>APM BIO-34</p>	<p>A Raven Monitoring and Control Plan shall be prepared consistent with the most current USFWS-approved raven management guidelines. The purpose of the plan is to avoid any project-related increases in raven numbers during construction, operation, and decommissioning. The Raven Monitoring and Control Plan shall be submitted to BLM, CDFW, and USFWS for approval at least 30 days prior to the start of construction.</p>	<p>APM 72</p>

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Biological Resources	APM BIO-35	A Burrowing Owl Relocation Plan shall be prepared and submitted to CDFW for approval. Burrowing owls occupying burrows on-site shall be passively relocated outside the nesting season (February 1–August 31) or after a qualified biologist determines that the burrow does not contain eggs or chicks and after consultation with CDFW. Prior to construction and passive relocation, artificial burrows shall be installed in areas that would not be disturbed during construction at a ratio of 5:1 for each burrow that will be destroyed by project construction. Passive relocation shall be conducted prior to construction and according to guidelines from the California Burrowing Owl Consortium (1993).	N/A
Biological Resources	APM BIO-36	Compensatory habitat mitigation shall be provided at a 1:1 ratio for impacts to suitable desert tortoise habitat during construction. A Habitat Compensation Plan shall be prepared to the approval of CDFW, USFWS, and BLM.	APM 73
Biological Resources	APM BIO-37	No pets or domestic animals shall be allowed on-site prior to or during construction, except kit fox scat detection dogs (with CDFW approval) used for preconstruction surveys or postconstruction kit fox mortality monitoring. The project will not authorize the housing or grazing of domestic animals on the project site. Feeding of animals will be prohibited to discourage the spread of non-native birds, to discourage the spread of disease and pathogens, etc.	APM 73

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<p>Biological Resources</p>	<p>MM BIO-1</p>	<p>Best Management Practices. To reduce indirect impacts to special-status plants and wildlife that may occur in the study area, BMPs shall be implemented prior to and during construction to control dust pollution, prevent discharge of potentially harmful chemicals, and prevent changes in hydrology. BMPs may include the installation of erosion and sedimentation control devices, applying water to control dust, placing drip pans under equipment when not in use, refueling in designated areas, and containing concrete washout properly, among other practices.</p>	<p>N/A</p>
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Biological Resources	MM BIO-2	<p>Worker Environmental Awareness Program. Prior to project initiation, the Designated Biologist shall develop and implement the WEAP (APM BIO-12), which will be available in English and Spanish. Wallet-sized cards summarizing the information shall be provided to all construction and operation and maintenance personnel. The WEAP shall include the following:</p> <ul style="list-style-type: none"> • An explanation of the sensitivity of the vegetation communities and special-status plant and wildlife species within and adjacent to work areas, and proper identification of these resources. • Biology and status of the desert tortoise, golden eagle, burrowing owl, other nesting birds, desert bighorn sheep, kit fox, and American badger and measures to reduce potential effects on these species. • Actions and reporting procedures to be used if desert tortoise, burrowing owl, other nesting birds, desert bighorn sheep kit fox, or American badger are encountered. • An explanation of the function of flagging that designates authorized work areas. • Driving procedures and techniques to reduce mortality of wildlife on roads. • Discussion of the federal ESA and CESA, BGEPA, and MBTA and the consequences of non-compliance with these acts. • The importance of avoiding the introduction of invasive weeds onto the project area and surrounding areas. • A discussion of general safety protocols such as hazardous substance spill prevention and containment measures and fire prevention and protection measures. • A review of mitigation requirements that are applicable to their work. 	MM 3.4-1c

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Biological Resources	MM BIO-3	<p>Special-Status Plant Species and Cacti Impact Avoidance and Minimization. This measure will provide guidance on how project personnel can avoid unintended impacts to special-status plants on the project area (e.g., Utah vine milkweed) and provide for the salvage of protected cacti prior to construction. This measure includes the following requirements:</p> <ul style="list-style-type: none"> • The applicant shall establish Environmentally Sensitive Areas around Utah vine milkweed that has been identified on the project area and/or may be identified in project disturbance areas during site preparation. A minimum 100-foot exclusion area shall be established around the plants, which shall be clearly identified and maintained throughout construction to ensure that avoided plants are not inadvertently harmed. ESAs shall be clearly delineated in the field with temporary construction fencing and signs prohibiting movement of the fencing or sediment controls under penalty of work stoppages or compensatory mitigation. • Worker Environmental Awareness Program. The WEAP (APM BIO-12; MM BIO-2) shall include training components specific to protection of special-status plants that occur on the project area. • Herbicide and Soil Stabilizer Drift Control Measures. Special-status plant occurrences within 100 feet of the project disturbance area, including Utah vine milkweed, shall be protected from herbicide and soil stabilizer drift. The IWMP includes measures to avoid chemical drift or residual toxicity to special-status plants consistent with guidelines such as those provided by the Nature Conservancy's Global Invasive Species Team (Hillmer and Liedtke 2003), the U.S. Environmental Protection Agency, and the Pesticide Action Network 	MM 3.3-3

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Database.

- Erosion and Sediment Control Measures. Erosion and sediment control measures shall not inadvertently impact special-status plants (e.g., by using invasive or non-Mojave Desert native plants in seed mixtures, introducing pest plants through contaminated seed or straw, etc.). These measures shall be incorporated in the Comprehensive Drainage, Stormwater, and Sedimentation Control Plan.

<p>Biological Resources</p>	<p>MM BIO-3</p>	<ul style="list-style-type: none"> • Preconstruction Vegetation Salvage. The applicant shall provide a draft Vegetation Resources Management Plan detailing the methods for the salvage and transplantation of target succulent species covered under the CDNPA. The plan shall be submitted to CDFW for review and approval at least 30 days prior to the start of ground-disturbing activities and shall include, at a minimum, the following elements: <ul style="list-style-type: none"> a. Soil baseline characterization. The characterization shall be presented to CDFW prior to ground disturbance and shall include: <ul style="list-style-type: none"> i. Profile description of three representative pedons. (A pedon is the smallest three-dimensional sampling unit displaying the full range of characteristics of a particular soil and typically occupies an area ranging from about 1 to 10 square yards.) ii. Characterization of surface application (desert pavement or biological soil crust present). Description of biological soil crust shall include major groups of organisms identified at the site (filamentous cyanobacteria, other cyanobacteria, mosses, lichens, liverworts) and the characteristics by which they were identified (see item b, below). iii. Documentation of soil macro-invertebrates (that is, presence of ants, termites, and other significant macro-invertebrates). • Bulk density, along with a reference to a generally accepted method for making the determination. • Fertility (nutrient status, electrical conductivity, sodium adsorption ratio), along with methods by which composite samples were collected and the laboratory methods used to determine these properties. Composite samples will contain equal contributions from at least six randomly located collection points within the soil donor area. • Organic matter content and total carbon and nitrogen content, along with a reference to generally accepted methods for making the determinations. 	<p>MM 3.3-3</p>
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		<p>a. Soil compaction shall be determined by measurement of bulk density in grams per cubic centimeter (or numerically equivalent units). Bulk density may be determined by any of several standard measurements, but the method used must be referenced to a widely accepted soil methodology publication. In no case shall soil be compacted to a bulk density that exceeds 1.6 grams per cubic centimeter except where no planting is to take place. Penetrometer measurements are not a substitute for bulk density measurements. Once characterized, the top 3 inches of topsoil shall be salvaged from the areas where traditional grading will be used per the following protocol, and stored within the project area. The upper 0.25 inch may be collected separately to preserve biological crust organisms. Topsoil may not be distinguishable from subsoils by color or organic content at the time of salvage but is characterized as the layer that contains fine roots during the active growing season. Soil shall be collected, transported, and formed into stockpiles only while the soil is dry. The vegetation in place at or immediately before topsoil collection shall be healthy native vegetation with less than 15% absolute cover of exotic weed growth. Soil occupied by vegetation of high plant diversity shall be given priority over soil occupied by low-diversity native vegetation. Soil may be collected with a front loader, bulldozer, or scraper and transported to storage areas by front loader, dump truck, or scraper. The equipment transporting the soil may not travel across the stockpile more than the minimum number of times required to build the soil to its intended depth. The depth of the stockpiles shall not exceed 4 feet in the case of sandy loam or loamy sand soils. Topsoil stockpiles shall be kept dry and covered if no vegetation is introduced. If native vegetation is grown on the stockpiles to increase seeds and soil organisms, no cover is required. Artificial watering may be provided at the applicant's</p>	
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		<p>option.</p> <p>Stockpiled topsoil shall be used to grow native plant species for the purpose of producing native seeds and building beneficial microorganisms in the soil volume. All native plant species encountered in the vegetation surveys shall be included in the growing rotation on the stockpiles. Most growing space needs to be dedicated to the species for which the most seeds shall be required. At least half by area of the growing area during each growing cycle shall be dedicated to plant species known to be good mycorrhizal host plants. Members of the families Chenopodiaceae and Amaranthaceae should be limited to less than half the area of the soil stockpiles, with the other half occupied by known mycorrhizal host plant species.</p> <p>b. Biological Soil Crust Characterization and Preservation. Biological soil crust is defined here as a mixture of organisms that occupy and protect the surface of the soil in most desert ecosystems. The organisms often include filamentous and non-filamentous cyanobacteria, mosses, lichens, liverworts, and fungi. Biological soil crust shall be preserved by collecting the upper 0.25 inch of topsoil from areas to be graded. The applicant and/or its contractor(s) shall collect from specific areas known to contain biological crust organisms or collect upper soil from the entire area to be graded. Collections shall emphasize filamentous cyanobacteria, but other cyanobacteria, mosses, lichens, and liverworts are also considered valuable contributors to biological soil crust and important in protecting against erosion and reducing weed invasion, and shall be collected as a secondary priority. Soil surface crust shall be air dried and stored dry in a shaded location in containers that allow air movement, such as loose-weave fabric bags. In no case may the stored crust be subject to wetting or direct sunlight during storage. All containers shall be clearly</p>	
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		<p>labeled with date and location of original collection; name and contact information of persons responsible for identifying suitable material to collect; and the persons who collected, stored, and maintained collections. Biological soil crust shall be re-applied at the time of replanting by crumbling the stored material and broadcasting it on the surface of the soil. Approximately 10% of the stored material shall be broadcast on topsoil storage areas among plants being grown for seed and soil microorganisms. When the growing cycle progresses to new planting, the soil supporting biological crust shall be collected and stored by the same methods prescribed for collections from the original soil, in clearly labeled bags or other suitable containers.</p> <p>c. Succulent Transplant. The majority of the succulent plants located in areas to be dragged, rolled, or spot graded, or above mowing height, shall be salvaged and transplanted into a nursery area. The Succulent Transplant portion of the Vegetation Resources Management Plan shall include, at a minimum:</p> <ul style="list-style-type: none"> i. The location of target plants on the project area; ii. Criteria for determining which individual plants are appropriate for salvage; iii. The proposed methods for salvage, propagation, transport, and planting; iv. Procedures for identifying target species during preconstruction clearance surveys; v. Considerations for storing salvaged plants or pre-planting requirements; and vi. Suggested transplantation sites. <p>Succulents to be transplanted into the nursery area shall be placed in their same compass orientation as they were in their original location. The salvaged plants also shall be kept in long-term soil stockpiles,</p>	
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		<p>along with natives grown on the stockpiles, to keep the soil biota fresh. Succulent transplants done during preparation of the project area shall be fully documented and serve as trials of methods to be used during plant salvage on the project area. Records shall be maintained for each transplanted specimen including species; height; number of branches or pads as appropriate; donor location by UTM coordinates; methods used to remove, transport, and store the plant; period of temporary storage; location; facility description; planting medium used for storage; and frequency of watering during storage. Records shall be kept at the time of planting at the storage area, and quarterly thereafter during storage until such time as each plant is placed in the field or dies. Transplanted individuals shall be maintained for 3 years, including removal of invasive species and irrigation (if necessary), as well as monitored for 3 years to determine the percentage of surviving plants each year and to adjust maintenance activities using an adaptive management approach.</p> <p>d. Seed Collection. Seed collection shall be carried out within the ROW grant area and within 10 miles of the boundaries of the project area on similar terrain, soil, exposure, slope and elevation to the project area. Seed collection guidelines shall conform to all laws and regulations in effect at the time of collection. Seed collection shall include all plant species known to be removed from the facility. If insufficient seeds are provided by “seed farming” and collection within 10 miles of the site, CDFW may approve collection from a greater distance provided other environmental factors at the collection site are good matches to the project area. Collected seed may be used to seed salvaged topsoil piles during the construction phase and after decommissioning related to restoring the project area.</p> <p>e. If the palo verde trees on-site meet the CDFW size criterion for</p>	
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		<p>replacement (i.e., at least one stem greater than 2 inches in diameter) and cannot be salvaged based on the professional opinion of a qualified biologist/horticulturalist, three replacement plants shall be planted in or near the project area for each affected tree and monitored following the above guidance.</p>	
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<p>Biological Resources</p>	<p>MM BIO-4</p>	<p>Biological Monitoring. Biological Monitor(s) shall be employed to assist the Designated Biologist in conducting preconstruction surveys and monitoring ground disturbance, grading, construction, decommissioning, and restoration activities. Additionally, biological monitoring shall be performed during any ground disturbance or grading activities that occur during operation and maintenance. The Biological Monitor(s) shall have sufficient education and field experience to understand resident wildlife species biology; have experience conducting desert tortoise, burrowing owl, kit fox, and badger field monitoring; and be able to identify these species and their sign (including active burrows). The Designated Biologist shall submit a resume, at least three references, and contact information for each prospective Biological Monitor to CDFW and USFWS for approval. To avoid and minimize effects on biological resources, the Biological Monitor(s) shall assist the Designated Biologist with the following:</p> <ul style="list-style-type: none"> • Be present during construction activities that take place in suitable habitat for desert tortoise, burrowing owl, kit fox, badger, or other protected species to prevent or minimize harm or injury to these species. This also includes unfenced construction activities for desert bighorn sheep. • Activities of the Biological Monitor(s) include, but are not limited to, ensuring compliance with all avoidance and minimization measures; monitoring for desert tortoise, burrowing owl, kit fox, badger, and other protected species; halting construction activity in the area if an individual is found; and checking the staking/flagging of all disturbance areas to be sure that they are intact and that all construction activities are being kept within the staked/flagged limits. If a desert tortoise, burrowing owl, desert bighorn sheep, kit fox, badger, or other protected species is found within a work area, the Biological Monitor(s) 	<p>MM 3.4-1b</p>
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		<p>shall immediately notify the Designated Biologist, who shall determine measures to be taken to ensure that the individual is not harmed.</p> <ul style="list-style-type: none"> • Inspect the study area for any special-status wildlife species. • Ensure that potential habitats within the construction zone are not occupied by special-status species (e.g., potential burrows or nests are inspected). • In the event of the discovery of a non-listed, special-status ground-dwelling animal, recover and relocate the animal to adjacent suitable habitat at least 200 feet from the limits of construction activities. • At the end of each work day, inspect all potential wildlife pitfalls (e.g., trenches, bores, other excavations) for wildlife and remove wildlife as necessary. If the potential pitfalls will not be immediately backfilled following inspection, the Biological Monitor(s) will ensure that the construction crew slopes the ends of the excavation (3:1 slope), provides wildlife escape ramps, or completely and securely covers the excavation to prevent wildlife entry. • Inspect the site to ensure trash and food-related waste is placed in closed-lid containers and that workers do not feed wildlife. Also inspect the work area each day to ensure that no microtrash (e.g., bolts, screws, etc.) is left behind. <p>MM BIO-5: Designated Biologist. The applicant</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

<p>Biological Resources</p>	<p>MM BIO-5</p>	<p>Designated Biologist. The applicant shall assign at least one Designated Biologist to the project. The applicant shall submit the resume of the proposed Designated Biologist(s), with at least three references and contact information, to the BLM Authorized Officer for approval in consultation with CDFW and USFWS.</p> <p>The Designated Biologist must meet the following minimum qualifications:</p> <ul style="list-style-type: none"> • Have a bachelor’s degree in biological sciences, zoology, botany, ecology, or a closely related field; • Have 3 years of experience in field biology or current certification of a nationally recognized biological society, such as The Ecological Society of America or The Wildlife Society; • Have at least 1 year of field experience with biological resources found in or near the study area; • Meet the current USFWS Authorized Biologist qualifications criteria, demonstrate familiarity with protocols and guidelines for the desert tortoise, and be approved by the USFWS; • Possess a CESA Memorandum of Understanding pursuant to Section 2081(a) for desert tortoise. <p>In lieu of the above requirements, the resume shall demonstrate to the satisfaction of the BLM Authorized Officer, in consultation with CDFW and USFWS, that the proposed Designated Biologist or alternate has the appropriate training and background to effectively implement the MMs.</p>	<p>MM 3.3-1</p>
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Biological Resources	MM BIO-6	<p>Fence Design and Site Permeability. Permanent site fencing installed around the project should be designed to allow for the passage of wildlife, to the extent feasible given the need for the fencing to prevent ingress by desert tortoise. Depending on the fencing material, the fence line should have gaps of approximately 4 to 6 inches accessible to wildlife other than desert tortoise and the fencing material should be knuckled back to create a smooth edge. Alternate designs may also be constructed with prior written approval from CDFW and USFWS. Regardless, the project shall ensure that any such fence meets existing specifications that have been developed to preclude accidental entanglement of desert bighorn sheep, deer, and other animals.</p> <p>Fencing should be sufficient to prevent desert bighorn sheep passage (e.g., 2m-2.5m tall chain-link) – should be installed at the corridor entrances between (a) the East Array and South Array 1, (b) South Array 1 and South Array 2, and (c) South Array 2 and South Array 3 on the east side (Figure 2, Project Design). Gaps of approximately 4 to 6 inches should occur at the bottom of the fence to allow small wildlife, mesocarnivores, coyote and American badger to pass under.</p> <p>Additionally, the project shall extend a line of project fencing to the north to connect with the wildlife exclusion fencing associated with the I-15 overcrossing structure (Figure 13, Fencing Plans of the Desert Bighorn Sheep Study). Approximately 1,640 linear feet of this can be accomplished within the existing project boundary, but the additional approximately 300 linear feet will need to be coordinated with BLM and possibly Caltrans. The project will secure the necessary encroachment permits or other mechanism to continue fencing</p>	N/A

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		<p>between the project boundary and the wildlife exclusion fencing associated with the I-15 overcrossing structure. Care should be taken when connecting the fences to make sure that they are physically connected or directly abut one another such that wildlife can't pass through or get stuck between them. The ultimate fencing plans should be reviewed by CDFW for final approval prior to site disturbance activities.</p>	
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<p>Biological Resources</p>	<p>MM BIO-7</p>	<p>Compliance Monitoring by the Designated Biologist. Prior to ground-disturbing activities, an individual shall be designated and approved by CDFW as a Designated Biologist (i.e., field contact representative). Designated Biologist qualifications are presented below. The Designated Biologist shall be employed for the period during which ongoing construction and postconstruction monitoring and reporting by an approved biologist is required. Each successive Designated Biologist shall be approved by CDFW. The Designated Biologist shall have the authority to ensure compliance with all measures set forth in the BO and CESA Section 2081 take authorization and with all MMs included herein, and shall be the primary agency contact for the implementation of these measures. The Designated Biologist shall have the authority and responsibility to halt any project activities that are in violation of the terms of the BO, Section 2081 take authorization, or project MMs. A list of responsibilities of the Designated Biologist is summarized below. To avoid and minimize effects to biological resources, the Designated Biologist shall:</p> <ul style="list-style-type: none"> • Notify CDFW and USFWS at least 14 calendar days before initiation of ground-disturbing activities. • Immediately notify the CDFW in writing if the applicant/owner does not comply with any of the MMs or terms of the BO and/or the Section 2081 take authorization including, but not limited to, any actual or anticipated failure to implement such measures within the periods specified. • Ensure performance of daily compliance inspections during ongoing construction as clearing, grubbing, and grading are completed, and 	<p>MM 3.4-1a</p>
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		submit a monthly compliance report to CDFW until construction is complete.	
Biological Resources	MM BIO-8	Speed Limits. Speed limits along all access roads outside of permanent desert tortoise fencing shall not exceed 15 mph to minimize dust during construction activities. Speed limits within permanent desert tortoise fencing shall not exceed 25 mph to minimize impacts during operation and maintenance. Nighttime vehicle traffic associated with project activities shall be kept to a minimum	MM 3.4-1d

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		volume and speed (maximum of 15 mph) to prevent mortality of nocturnal wildlife species.	
Biological Resources	MM BIO-9	<p>Desert Tortoise Protection. The applicant/owner shall undertake appropriate measures to manage the construction site and related facilities in a manner to avoid or minimize impacts to desert tortoise. Methods for clearance surveys, fence specification and installation, tortoise handling, artificial burrow construction, egg handling, and other procedures shall be consistent with those described in the USFWS’s Desert Tortoise (Mojave Population) Field Manual (USFWS 2009) or more current guidance provided by CDFW and USFWS. The applicant/owner shall also implement all terms and conditions described in the BO to be prepared by USFWS and CESA ITP. These measures include, but are not limited to, the following, subject to modification by the terms of incidental take authorizations issued by the USFWS and CDFW:</p> <ul style="list-style-type: none"> • Desert Tortoise Fencing along I-15. If required by CDFW, to avoid increases in vehicle-related mortality from disruption of local movement patterns along the existing ephemeral wash systems, desert tortoise-proof fencing shall be installed along the existing freeway ROW fencing on both sides of I-15 for the entire east-west dimension of the project area. The tortoise fencing shall be designed to direct tortoises to existing undercrossing to provide safe passage under the freeway and shall be regularly inspected and maintained for the life of the project. 	MM 3.4-2a

<p>Biological Resources</p>	<p>MM BIO-9</p>	<ul style="list-style-type: none"> • Desert Tortoise Exclusion Fence Installation. To avoid impacts to desert tortoise, permanent desert tortoise exclusion fencing shall be installed along the permanent perimeter security fence and temporarily installed along road corridors during construction. The proposed alignments for the permanent perimeter fence and temporary fencing shall be flagged and surveyed within 24 hours prior to the initiation of fence construction. Clearance surveys of the perimeter fence and temporary fencing areas shall be conducted by the Designated Biologist(s) using techniques outlined in the USFWS's Desert Tortoise (Mojave Population) Field Manual and may be conducted in any season with USFWS and CDFW approval. Biological Monitors may assist the Designated Biologist under his or her supervision. These fence clearance surveys shall provide 100% coverage of all areas to be disturbed and an additional transect along both sides of the fence line covering an area approximately 90 feet wide centered on the fence alignment. Transects shall be no greater than 15 feet apart. All desert tortoise burrows and burrows constructed by other species that might be used by desert tortoise shall be examined to assess occupancy of each burrow by desert tortoise and handled in accordance with the USFWS's Desert Tortoise Field Manual. Any desert tortoise located during fence clearance surveys shall be handled by the Designated Biologist in accordance with the USFWS's 2009 Desert Tortoise (Mojave Population) Field Manual (USFWS 2009). <ul style="list-style-type: none"> a. Timing, Supervision of Fence Installation. The exclusion fencing shall be installed prior to the onset of site clearing and grubbing. The fence installation shall be supervised by the Designated Biologist and monitored by the Biological Monitors to ensure the safety of any tortoise present. 	<p>MM 3.4-2a</p>
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		<p>b. Fence Material and Installation. The permanent tortoise exclusionary fencing shall be constructed in accordance with the USFWS’s Desert Tortoise (Mojave Population) Field Manual (Chapter 8 – Desert Tortoise Exclusion Fence) (USFWS 2009).</p> <p>c. Security Gates. Security gates shall be designed with minimal ground clearance to deter ingress by tortoises. The gates may be electronically activated to open and close immediately after the vehicle(s) have entered or exited to prevent the gates from being kept open for long periods of time. Cattle grating designed to safely exclude desert tortoise shall be installed at the gated entries to discourage tortoises from gaining entry.</p> <p>d. Fence Inspections. Following installation of the desert tortoise exclusion fencing for both the permanent site fencing and temporary fencing, the fencing shall be regularly inspected. If tortoises were moved out of harm’s way during fence construction, permanent and temporary fencing shall be inspected at least two times per day for the first 7 days to ensure a recently moved tortoise has not been trapped within the fence. Thereafter, permanent fencing shall be inspected monthly and during or within 24 hours following all major rainfall events. Exceptions to inspections during major rainfall events may be made as needed to maintain crew safety. A major rainfall event is defined as one for which flow is detectable within the fenced drainage. Any damage to the fencing shall be temporarily repaired immediately to keep tortoises out of the site, and permanently repaired within 48 hours of observing damage. Inspections of permanent site fencing shall occur for the life of the project. Temporary fencing shall be inspected weekly and, where drainages intersect the fencing, during and within 24 hours following major rainfall events. All damaged temporary fencing shall be repaired immediately upon discovery and, if</p>	
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		<p>the fence may have permitted tortoise entry while damaged, the Designated Biologist shall inspect the area for tortoise.</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Biological Resources	MM BIO-9	<ul style="list-style-type: none"> Desert Tortoise Clearance Surveys within Solar Arrays and Gen-tie. Clearance surveys shall be conducted in accordance with the USFWS Desert Tortoise (Mojave Population) Field Manual (USFWS 2009) (Chapter 6 – Clearance Survey Protocol for the Desert Tortoise – Mojave Population) and shall consist of two surveys covering 100% of the study area by walking transects no more than 15 feet apart. If a desert tortoise is located during the second survey, a third survey shall be conducted. Each separate survey shall be walked in a different direction to allow opposing angles of observation. Clearance surveys of the project area may only be conducted when tortoises are most active (April–May or September–October) unless the project receives approval from CDFW and USFWS. Clearance surveys of linear features may be conducted during any time of the year. Any tortoise located during clearance surveys of solar arrays shall be translocated or relocated and monitored in accordance with the DTTP (MM 3.4-2b). The Designated Biologist, who may be assisted by the Biological Monitors, shall assess occupancy of each burrow by desert tortoise in accordance with the USFWS Desert Tortoise (Mojave Population) Field Manual (USFWS 2009). All potential desert tortoise burrows located during clearance surveys shall be excavated by hand, tortoises removed, and burrows collapsed or blocked to prevent occupation by desert tortoise in accordance with the DTTP. 	MM 3.4-2a
Biological Resources	MM BIO-9	<ul style="list-style-type: none"> Monitoring Following Clearing. Following the desert tortoise clearance and removal from the project area, workers and heavy equipment shall be allowed to enter the project area to perform clearing, grubbing, leveling, and trenching activities. A Designated Biologist or Biological Monitor shall be on-site for clearing and grading 	MM 3.4-2a

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		activities to move tortoises missed during the initial tortoise clearance survey. Should a tortoise be discovered, it shall be relocated or translocated as described in the DTTP.	
Biological Resources	MM BIO-9	<ul style="list-style-type: none"> • Reporting. The Designated Biologist shall record the following information for any desert tortoise handled: a) the locations (narrative and maps) and dates of observation; b) general condition and health, including injuries, state of healing and whether desert tortoise voided their bladders; c) location moved from and location moved to (using GPS); d) gender, carapace length, and diagnostic markings (i.e., identification numbers or marked lateral scutes); e) ambient temperature when handled and released; and f) digital photograph of each handled tortoise. Desert tortoise moved from within the project area shall be marked and monitored in accordance with the DTTP. All collected data related to tortoise relocation shall be provided to CDFW and USFWS. 	MM 3.4-2a

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Biological Resources	MM BIO-10	Desert Tortoise Translocation Plan. The applicant/owner shall develop and implement a USFWS- and CDFW-approved DTTP. The DTTP, which shall be approved prior to any ground disturbance or tortoise relocation, shall include measures to minimize the potential for repeated translocations of individual desert tortoise. The goals of the DTTP shall be to relocate all desert tortoise from the project area to nearby suitable habitat; minimize impacts on resident desert tortoise outside the project area; minimize stress, disturbance, and injuries to relocated/translocated tortoises; and assess the success of the translocation effort through monitoring. The DTTP shall follow the Translocation of Mojave Desert Tortoises from Project Sites: Plan Development Guidance (USFWS 2011b) and shall clearly define how it addresses the 11 steps outlined in the guidance. The final DTTP shall be based on the draft DTTP prepared by the applicant/owner and shall include all revisions deemed necessary by CDFW and USFWS. The final plan will be subject to modification for consistency with the CESA ITP, USFWS take authorization and/or BO conservation requirements.	MM 3.4-2b
Biological Resources	MM BIO-11	Desert Tortoise Compliance Verification. The applicant/owner shall provide CDFW and USFWS staff with unfettered access to the project area and compensation lands under the control of the project owner and shall otherwise fully cooperate with the CDFW's efforts to verify the project owner's compliance with, or the effectiveness of, adopted MMs. The Designated Biologist shall do all of the following: <ul style="list-style-type: none"> • Notification. Notify CDFW at least 14 calendar days before initiating construction-related ground disturbance activities; immediately notify CDFW in writing if the project owner is not in compliance with any conditions of certification, including but not limited to any actual or 	MM 3.4-2c

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		<p>anticipated failure to implement MMs within the time periods specified in the conditions of certification;</p>	
<p>Biological Resources</p>	<p>MM BIO-11</p>	<ul style="list-style-type: none"> • Monitoring During Grubbing and Grading. Remain on-site daily while vegetation salvage, grubbing, grading, and other ground-disturbing construction activities are taking place to avoid or minimize take of listed species, and verify personally or have Biological Monitor(s) verify compliance with all impact avoidance and minimization measures, including checking all exclusion zones to ensure that signs, stakes, and fencing are intact and that human activities are restricted in these protective zones. • Monthly Compliance Inspections. Conduct compliance inspections at a minimum of once per month after clearing, grubbing, and grading are completed and submit a monthly compliance report to CDFW and USFWS during construction. 	<p>MM 3.4-2c</p>

<p>Biological Resources</p>	<p>MM BIO-11</p>	<p>• Notification of Injured or Dead Listed Species. If an injured or dead federally or state-listed species is detected on or near the project area CDFW and USFWS shall be notified immediately by phone. Notification shall occur no later than noon on the business day following the event if it occurs outside normal business hours so that the agencies can determine whether further actions are required to protect listed species. Written follow-up notification via facsimile or electronic communication shall be submitted to these agencies within 2 calendar days of the incident and include the following information as relevant:</p> <p>a. Injured Desert Tortoise. If a desert tortoise is injured as a result of project-related activities during construction, the Designated Biologist or Biological Monitor(s) shall immediately take it to a CDFW-approved wildlife rehabilitation and/or veterinarian clinic. Any veterinarian bills for such injured animals shall be paid by the applicant/owner. Following phone notification as required above, CDFW and USFWS shall determine the final disposition of the injured animal, if it recovers. Written notification shall include, at a minimum, the date, time, location, and circumstances of the incident and the name of the facility where the animal was taken.</p> <p>b. Desert Tortoise Fatality. If a desert tortoise is killed by project-related activities during construction, operation and maintenance, or decommissioning, a written report with the same information as an injury report shall be submitted CDFW and USFWS. These desert tortoises shall be salvaged according to federally established guidelines. The applicant/owner shall pay to have the desert tortoises transported and necropsied. The report shall include the date and time of the finding or incident.</p> <p>1. Final Listed Species Mitigation Report. The Designated Biologist</p>	<p>MM 3.4-2c</p>
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		<p>shall provide CDFW a Final Listed Species Mitigation Report that includes, at a minimum, 1) all available information about project-related incidental take of listed species; 2) information about other project impacts to the listed species; 3) construction dates; 4) an assessment of the effectiveness of conditions of certification in minimizing and compensating for project impacts; 5) recommendations on how MMs might be changed to more effectively minimize and mitigate the impacts of future projects on the listed species; and 6) any other pertinent information, including the level of take of the listed species associated with the project.</p> <p>2. Stop Work Order. CDFW may issue the project owner a written stop work order to suspend any activity related to the construction or operation of the project to prevent or remedy a violation of one or more conditions of certification (including but not limited to failure to comply with reporting, monitoring, or habitat acquisition obligations) or to prevent the illegal take of an endangered, threatened, or protected species. The project owner shall comply with the stop work order immediately upon receipt thereof.</p>	
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<p>Biological Resources</p>	<p>MM BIO-12</p>	<p>Desert Tortoise Compensatory Mitigation: To fully mitigate for habitat loss and potential take of desert tortoise, the project owner shall provide compensatory mitigation consistent with federal requirements, adjusted to reflect the final project footprint. The acreage for mitigation of desert tortoise habitat will be at a 1:1 ratio. For the purposes of this condition, the project footprint means all lands disturbed in the construction and operation of the project, including all project linears, as well as undeveloped areas inside the project's boundaries that will no longer provide viable long-term habitat for the desert tortoise. To satisfy this condition, the project owner shall acquire, protect, and transfer 1 acre of desert tortoise habitat for every acre of habitat within the final project footprint, and provide associated funding for the acquired lands, as specified below. In lieu of acquiring land itself, the project owner may satisfy the requirements of this condition by depositing funds into the Renewable Energy Action Team (REAT) Account established with the National Fish and Wildlife Foundation (NFWF), as provided below in Section 3.i. of this measure. If compensation lands are acquired in fee title or in easement, the requirements for acquisition, initial improvement, and long-term management of compensation lands include all of the following, subject to modification by the terms of incidental take authorizations issued by USFWS and CDFW:</p> <ul style="list-style-type: none"> • Selection Criteria for Compensation Lands. The compensation lands selected for acquisition in fee title or in easement shall: <ol style="list-style-type: none"> a. be within the Western Mojave Recovery Unit, or, with prior USFWS and CDFW approval, within the Eastern Mojave Recovery Unit as defined in the 2011 Revised Recovery Plan (USFWS 2011b), with potential to contribute to desert tortoise habitat connectivity and build linkages between desert tortoise designated critical habitat, known 	<p>MM 3.4-2d</p>
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		<p>populations of desert tortoise, and/or other preserve lands;</p> <p>b. provide habitat for desert tortoise with capacity to regenerate naturally when disturbances are removed;</p> <p>c. be prioritized near larger blocks of land that are either already protected or planned for protection, such as Desert Wildlife Management Areas within the Western Mojave Recovery Unit (or nearby portions of the Eastern Mojave Recovery Unit with prior USFWS and CDFW approval) or which could feasibly be protected long term by a public resource agency or a non-governmental organization dedicated to habitat preservation;</p> <p>d. be connected to lands with desert tortoise habitat equal to or better quality than the project area, ideally with populations that are stable, recovering, or likely to recover;</p> <p>e. not have a history of intensive recreational use or other disturbance that does not have the capacity to regenerate naturally when disturbances are removed or might make habitat recovery and restoration infeasible;</p> <p>f. not be characterized by high densities of invasive species, either on or immediately adjacent to the parcels under consideration, that might jeopardize habitat recovery and restoration;</p> <p>g. not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat; and</p> <p>h. have water and mineral rights included as part of the acquisition, unless BLM and CDFW, in consultation with CDFW and USFWS, agree in writing to the acceptability of the land.</p> <p>• Review and Approval of Compensation Lands Prior to Acquisition. The project owner shall submit a formal acquisition proposal to BLM, CDFW, and USFWS describing the parcel(s) intended for purchase. This acquisition proposal shall discuss the suitability of the proposed</p>	
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		<p>parcel(s) as compensation lands for desert tortoise in relation to the criteria listed above. Approval from the BLM and CDFW in consultation with USFWS shall be required for acquisition of all compensatory mitigation parcels.</p>	
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<p>Biological Resources</p>	<p>MM BIO-12</p>	<ul style="list-style-type: none"> • Compensation Lands Acquisition Requirements. The project owner shall comply with the following requirements relating to acquisition of the compensation lands after BLM, in consultation with CDFW and USFWS, have approved the proposed compensation lands: <ul style="list-style-type: none"> a. Preliminary Report. The project owner, or approved third party, shall provide a recent preliminary title report, initial hazardous materials survey report, biological analysis, and other necessary or requested documents for the proposed compensation land to the BLM. All documents conveying or conserving compensation lands and all conditions of title are subject to review and approval by BLM and CDFW, in consultation with USFWS. For conveyances to the State, approval may also be required from the California Department of General Services, the Fish and Game Commission, and the Wildlife Conservation Board. b. Title/Conveyance. The project owner shall transfer fee title to the compensation lands, a conservation easement over the lands, or both fee title and conservation easement as required by the BLM and CDFW. Transfer of either fee title or an approved conservation easement will usually be sufficient, but some situations, e.g., the donation of lands burdened by a conservation easement to BLM, will require that both types of transfers be completed. Any transfer of a conservation easement or fee title must be to CDFW, a non-profit organization qualified to hold title to and manage compensation lands (pursuant to California Government Code section 65965), or BLM under terms approved by the BLM. If an approved non-profit organization holds title to the compensation lands, a conservation easement shall be recorded in favor of CDFW in a form approved by CDFW. If an approved non-profit holds a conservation easement, CDFW shall be named a third-party beneficiary. 	<p>MM 3.4-2d</p>
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		<p>c. Initial Habitat Improvement Fund. The project owner shall fund the initial protection and habitat improvement of the compensation lands. Alternatively, a non-profit organization may hold the habitat improvement funds if it is qualified to manage the compensation lands (pursuant to California Government Code Section 65965) and if it meets the approval of CDFW and BLM. If CDFW takes fee title to the compensation lands, the habitat improvement fund must be paid to CDFW or its designee.</p> <p>d. Property Analysis Record. Upon identification of the compensation lands, the project owner shall conduct a Property Analysis Record (PAR) or PAR-like analysis to establish the appropriate long-term maintenance and management fee to fund the in perpetuity management of the acquired mitigation lands.</p> <p>e. Long-term Maintenance and Management Fund. The project owner shall deposit in NFWF's REAT Account a capital long-term maintenance and management fee in the amount determined through the PAR or PAR-like analysis conducted for the compensation lands. BLM, in consultation with CDFW, may designate another non-profit organization to hold the long-term maintenance and management fee if the organization is qualified to manage the compensation lands in perpetuity. If CDFW takes fee title to the compensation lands, CDFW shall determine whether it will hold the long-term management fee in the special deposit fund, leave the money in the REAT Account, or designate another entity to manage the long-term maintenance and management fee for CDFW and with CDFW supervision.</p> <p>f. Interest, Principal, and Pooling of Funds. The project owner, BLM, and CDFW shall ensure that an agreement is in place with the long-term maintenance and management fee holder/manager to ensure the following conditions:</p>	
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		<p>i. Interest. Interest generated from the initial capital long-term maintenance and management fee shall be available for reinvestment into the principal and for the long-term operation, management, and protection of the approved compensation lands, including reasonable administrative overhead, biological monitoring, improvements to carrying capacity, law enforcement measures, and any other action approved by CDFW designed to protect or improve the habitat values of the compensation lands.</p> <p>ii. Withdrawal of Principal. The long-term maintenance and management fee principal shall not be drawn upon unless such withdrawal is deemed necessary by CDFW or the approved third-party long-term maintenance and management fee manager to ensure the continued viability of the species on the compensation lands. If CDFW takes fee title to the compensation lands, monies received by CDFW pursuant to this provision shall be deposited in a special deposit fund established solely for the purpose to manage lands in perpetuity unless CDFW designates NFWF or another entity to manage the long-term maintenance and management fee for CDFW.</p> <p>iii. Pooling Long-Term Maintenance and Management Fee Funds. CDFW, or a BLM- and CDFW-approved non-profit organization qualified to hold long-term maintenance and management fees solely for the purpose to manage lands in perpetuity, may pool the endowment with other endowments for the operation, management, and protection of the compensation lands for local populations of desert tortoise. However, for reporting purposes, the long-term maintenance and management fee fund must be tracked and reported individually to the CDFW.</p> <p>g. Other expenses. In addition to the costs listed above, the project owner shall be responsible for all other costs related to acquisition of</p>	
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		<p>compensation lands and conservation easements, including but not limited to title and document review costs; expenses incurred from other state agency reviews; overhead related to providing compensation lands to CDFW or an approved third party; escrow fees or costs; environmental contaminants clearance; and other site cleanup measures.</p> <p>h. Mitigation Security. The project owner shall provide financial assurances to the BLM and CDFW with copies of the document(s) to the USFWS, to guarantee that an adequate level of funding is available to implement the MMs described in this condition. These funds shall be used solely for implementation of the measures associated with the project in the event the project owner fails to comply with the requirements specified in this condition, or shall be returned to the project owner upon successful compliance with the requirements in this condition. The BLM's or CDFW's use of the security to implement measures in this condition may not fully satisfy the project owner's obligations under this condition. Financial assurance can be provided to the BLM and CDFW in the form of an irrevocable letter of credit, a pledged savings account, or another form of security ("Security"). Prior to submitting the Security to the BLM, the project owner shall obtain the BLM's approval in consultation with CDFW and the USFWS of the form of the Security. The actual costs to comply with this condition will vary depending on the final footprint of the project and the actual costs of acquiring, improving, and managing the compensation lands.</p> <p>i. NFWF REAT Account. The project owner may elect to fund the acquisition and initial improvement of compensation lands through NFWF by depositing funds for that purpose into NFWF's REAT Account. Initial deposits for this purpose must be made in the same</p>	
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		<p>amounts as the security required above, and may be provided in lieu of security. If this option is used for the acquisition and initial improvement, the project owner shall make an additional deposit into the REAT Account if necessary to cover the actual acquisition costs and administrative costs and fees of the compensation land purchase once land is identified and the actual costs are known. If the actual costs for acquisition and administrative costs and fees are less than anticipated in the PAR analysis, the excess money deposited in the REAT Account shall be returned to the project owner. Money deposited for the initial protection and improvement of the compensation lands shall not be returned to the project owner.</p> <p>The responsibility for acquisition of compensation lands may be delegated to a third party other than NFWF, such as a non-governmental organization supportive of desert habitat conservation, by written agreement of the BLM and CDFW. Such delegation shall be subject to approval by the BLM and CDFW, in consultation with USFWS, prior to land acquisition, initial protection, or maintenance and management activities. Agreements to delegate land acquisition to an approved third party, or to manage compensation lands, shall be implemented with 18 months of BLM's approval.</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Biological Resources	MM BIO-13	<p>Minimize Vehicle and Equipment Impacts during Operation and Maintenance. The applicant/owner shall implement measures to minimize the potential for desert tortoise and other wildlife species mortality along access and maintenance roads. These measures shall include:</p> <ul style="list-style-type: none"> • Speed limits identified in MM BIO-8 shall continue to be applied during operation and maintenance. • Pedestrian access outside the limits of the designated access/maintenance roads is permitted year-round as long as no ground-disturbing activities take place. • Vehicle traffic and parking shall be confined to designated access roads, and equipment and materials staging areas shall be clearly defined to avoid impacting habitat during the operation phase. 	MM 3.4-5a
Biological Resources	MM BIO-14	<p>Mojave Fringe-toed Lizard Protection Measures. A qualified biologist will conduct a focused survey for Mojave fringe-toed lizard prior to ground disturbance in suitable habitat (aeolian sand deposits) within all active work areas. Two survey replicates will be performed during the Mojave fringe-toed lizard active season (March–October) during appropriate weather conditions. Qualified biologists will walk transects spaced 10m apart throughout areas with suitable habitat within the study area. Detections of Mojave fringe-toed lizard will be recorded using a GPS unit. If Mojave fringe-toed lizards are not detected, then no further action is needed. If Mojave fringe-toed lizards are found, then a pre-construction survey should be conducted no more than one week before ground disturbance begins, and any Mojave fringe-toed lizards should be moved to suitable habitat south of the Project area where the species was confirmed to be present.</p>	N/A

<p>Biological Resources</p>	<p>MM BIO-15</p>	<p>Avian Monitoring and Mitigation Program. An Avian Monitoring and Mitigation Program (AMMP) shall be initiated and approved by the BLM in consultation with CDFW and USFWS prior to construction and continue for at least 5 years following commercial operation (and longer if determined necessary and appropriate by the Designated Biologist). The AMMP shall prevent substantial adverse effects to special-status species through implementation of the approach outlined in the postconstruction monitoring and adaptive management provisions of Region 8 Interim Guidelines for the Development of a Project-specific Avian and Bat Protection Plan for Solar Energy Plants and Related Transmission Facilities (USFWS 2010), in conjunction with any measures required after consultation with USFWS and/or CDFW under the ESA, CESA, or BGEPA, if applicable. The Program shall use surveys and monitoring of on-site avian and bat use and behavior to document species composition and changes in avian and bat use over time. The purpose of the AMMP is to provide an adaptive management and decision-making framework for reviewing, characterizing, and responding to avian and bat monitoring results, and reducing long-term impacts on these taxa. The AMMP shall include the following components:</p> <ul style="list-style-type: none"> • A description of the baseline and ongoing avian and bat survey methods, including identification of onsite survey locations and seasonal survey considerations, and a description of acoustic bat monitoring methods. • Avian and bat mortality and injury monitoring that includes: <ol style="list-style-type: none"> a. Onsite monitoring of representative locations in the facility, at a level of effort that accounts for potential spatial bias and allows for the extrapolation of survey results to non-surveyed areas. The AMMP will provide a rationale justifying the proposed schedule of carcass 	<p>MM 3.4-1h</p>
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		<p>searches.</p> <p>b. Low-visibility and high-wind weather event monitoring to document potential weather-related collision risks that may be associated increased risk of avian or bat collisions with project features, including foggy, highly overcast, or rainy night-time weather typically associated with an advancing frontal system, and high wind events (40-mph winds) are sustained for period of greater than 4 hours. The monitoring report shall include survey frequency, locations, and methods.</p> <p>c. Scavenger and searcher efficiency trials to document the extent to which avian or bat fatalities remain visible over time and can be detected, and to adjust the survey timing and survey results to reflect scavenger and searcher efficiency rates.</p> <p>d. A description of statistical methods used to generate facility estimates of potential avian and bat impacts based on the number of detections during standardized searches during the monitoring season for which the cause of death can be determined.</p> <p>e. Field detection and mortality or injury identification, cause attribution, handling and reporting requirements. The AMMP shall include detailed specifications on data collection and provide a carcass collection protocol.</p> <ul style="list-style-type: none"> • All postconstruction mortality monitoring studies included in the AMMP shall be performed by a third party contractor for 5 years following commercial operation and approval of the AMMP by the BLM. At the end of the 5-year period, the BLM shall determine whether the survey program shall be continued. • An adaptive management program shall be developed to identify and implement reasonable and feasible measures that would reduce levels of avian or bat mortality or injury attributable to project operations and facilities. Such measures could potentially include efforts to make 	
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		<p>panels more visible to birds (e.g., white borders around panel edges or the use of noise deterrents).</p> <p>The adaptive management program shall include (i) reasonable measures for characterizing the extent and importance of detected mortality and injuries clearly attributable to the project; (ii) potential measures that the project owner could implement to adaptively respond to detected mortality and injuries attributable to the project. Adaptive actions undertaken will be discussed and evaluated in survey reports. Any impact reduction measures must be commensurate (in terms of factors that include geographic scope, costs, and scale of effort) with the level of avian or bat mortality or injury that is specifically and clearly attributable to the project facilities; and (iii) Appropriate performance standards for mitigation of impacts to any species regulated by BGEPA, ESA, and CESA as well as MMs that reduce or offset mortalities caused by the project to a level that avoids a substantial, long-term reduction in the demographic viability of the local population of the species in question.</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

Biological Resources	MM BIO-16	<p>Avoid Disturbance to Nesting Birds. Vegetation clearing shall take place outside of the general avian breeding season (February 15–September 1), when feasible. If vegetation clearing cannot occur outside the avian breeding season, the Designated Biologist/Biological Monitor(s) shall conduct a preconstruction survey for nesting birds no more than 3 days prior to vegetation clearing. If no active nests are found, clearing can proceed. If active nests are found, no clearing shall be allowed within 150 feet (for passerines) to 250 feet (for raptors) of the active nests until the Designated Biologist/Biological Monitor(s) determines the nest is no longer active or the nest fails. Based on observation of the individual birds’ tolerance to human activity, this buffer may be reduced by a qualified biologist. Encroachment into the buffer may occur at the discretion of a qualified biologist.</p> <p>The Designated Biologist/Biological Monitor(s) shall submit the results of the preconstruction nesting bird surveys to BLM, USFWS, and CDFW. Following agency coordination, the size of the next buffer may be adjusted based upon the magnitude of proposed activities and observed sensitivity of the bird to disturbance.</p>	MM 3.4-4
Biological Resources	MM BIO-17	<p>Lighting Specifications to Minimize Bird and Bat Impacts. The applicant/owner shall minimize night lighting during construction by using shielded directional lighting that is pointed downward, thereby avoiding illumination to adjacent natural areas and the night sky.</p>	MM 3.4-1e

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

<p>Biological Resources</p>	<p>MM BIO-18</p>	<p>Bird and Bat Conservation Strategy (BBCS). The applicant/owner shall develop a BBCS to address project impacts to special-status avian and bat species that shall be consistent with the Region 8 Interim Guidelines for the Development of a Project-specific Avian and Bat Protection Plan for Solar Energy Plants and Related Transmission Facilities (USFWS 2010). The applicant/owner shall submit the BBCS to the CDFW and USFWS for review and approval prior to initiation of project construction. The BBCS shall include an assessment of potential avian and bat impacts from lighting, noise, collision, electrocution, and attraction of ravens, as applicable; measures to mitigate for the effects to birds; a description of general avoidance and minimization measures applicable during construction, operation and maintenance, and postconstruction to include nest management and postconstruction monitoring; a description of the reporting requirements and reporting schedule and duration; and the adaptive management strategy. A raven management element shall be included in the BBCS or provided separately that includes measures such as storage of garbage in raven-proof containers and installation of anti-nesting devices on structures where raven nests could be built.</p>	<p>MM 3.4-1g</p>
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<p>Biological Resources</p>	<p>MM BIO-19</p>	<p>Burrowing Owl Protection Measures. No more than 14 days prior to the start of ground disturbance, a preconstruction survey for burrowing owls in conformance with the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012) shall be completed within suitable habitat at every work area and within a 150-m buffer zone of each work area. Work areas will be resurveyed following periods of inactivity of 2 weeks or more. The applicant/owner shall submit the results of the preconstruction survey to BLM's Authorized Officer and CDFW. The applicant/owner shall also submit evidence of conformance with federal and state regulations regarding the protection of the burrowing owl by demonstrating compliance with the following:</p> <ul style="list-style-type: none"> • Unless otherwise authorized by BLM and CDFW, no disturbance shall occur within 160 feet (50 m) of occupied burrows during the non-breeding season (September 1–January 31) or within 650 feet (200 m) during the breeding season (February 1–August 31). Eviction outside the nesting season may be permitted pending evaluation of eviction plans (developed in accordance with CDFW protocol for burrowing owls) by CDFW and receipt of formal written approval from CDFW authorizing the eviction. A Burrowing Owl Mitigation and Monitoring Plan following the guidance in the CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012) shall be submitted to the BLM's Authorized Officer and CDFW for review and approval prior to passive relocation. • In the event that an occupied burrow cannot be avoided, passive relocation of owls may be implemented prior to construction activities only if a qualified biologist approved by BLM verifies through non-invasive methods that either the birds have not begun egg-laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent survival. Eviction 	<p>MM 3.4-1f</p>
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		<p>outside the nesting season may be permitted pending evaluation of eviction plans (developed in accordance with BLM protocol for burrowing owls) by CDFW and receipt of formal written approval from BLM authorizing the eviction. A Burrowing Owl Mitigation and Monitoring Plan shall be submitted to the BLM, and CDFW for review and approval prior to passive relocation.</p> <ul style="list-style-type: none"> • Occupied burrows shall not be disturbed during the nesting season (February 1–August 31). In the event that an occupied burrow absolutely cannot be avoided (e.g., due to physical or safety constraints), passive relocation of owls may be implemented prior to construction activities only if a qualified biologist approved by CDFW verifies through non-invasive methods that either the birds have not begun egg-laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent survival. • Unless otherwise authorized by CDFW, a 650-foot buffer within which no activity will be permissible shall be maintained between project activities and nesting burrowing owls during the nesting season. This protected area shall remain in effect until August 31 or at CDFW’s discretion and, based on monitoring evidence, until the young owls are foraging independently. • If accidental take (disturbance, injury, or death of owls) occurs, the Designated Biologist shall be notified immediately. • Impacts to active burrowing owl territories shall be mitigated at a 1:1 ratio through a combination of off-site habitat compensation and/or off-site restoration of disturbed habitat capable of supporting this species. The acquisition of occupied habitat off-site shall be in an area where energy facilities would not pose a mortality risk. Acquisition of habitat shall be consistent with the CDFW’s Staff Report on Burrowing Owl 	
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		<p>Mitigation (CDFW 2012). The preserved habitat shall be occupied by burrowing owl and shall be of superior or similar habitat quality to the impacted areas in terms of soil features, extent of disturbance, habitat structure, and dominant species composition, as determined by a qualified ornithologist. The site shall be approved by BLM and CDFW. Land shall be purchased and/or placed in a conservation easement in perpetuity and managed to maintain suitable habitat. The off-site area to be preserved can coincide with other off-site mitigation lands, with the approval of CDFW.</p> <ul style="list-style-type: none">• The approved biologist shall remain on-site until all vegetation is cleared and, at a minimum, conduct site and fence inspections on a regular (monthly) schedule throughout construction to ensure that the project is in compliance with the MMs.• Employees and contractors shall look under vehicles and equipment for the presence of wildlife prior to moving vehicles and equipment. If present, the animal shall be left to move on its own or until it is removed by the approved biologist. No listed species shall be handled without concurrence from USFWS and/or CDFW, as applicable.	
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<p>Biological Resources</p>	<p>MM BIO-20</p>	<p>American Badger and Desert Kit Fox Protection. To avoid direct impacts to American badger and desert kit fox, preconstruction surveys shall be conducted for these species concurrently with the desert tortoise surveys. Surveys shall be conducted as described below:</p> <ul style="list-style-type: none"> • Biological Monitors shall perform preconstruction surveys for badger and kit fox dens in the project disturbance area, including a 20-foot swath beyond the disturbed area, utility corridors, and access roads. If dens are detected, each den shall be classified as inactive, potentially active, or definitely active. • Inactive dens that would be directly impacted by construction activities shall be excavated by hand and backfilled to prevent reuse by badgers or kit fox. • Potentially and definitely active dens that would be directly impacted by construction activities shall be monitored by the Biological Monitor for 3 consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) and/or infrared camera stations at the entrance. • If no tracks are observed in the tracking medium or no photos of the target species are captured after 3 consecutive nights, the den shall be excavated and backfilled by hand. • If tracks are observed, the den shall be progressively blocked with natural materials (rocks, dirt, sticks, and vegetation piled in front of the entrance) for the next three to five nights to discourage the badger or kit fox from continued use. After verification that the den is unoccupied it shall then be excavated and backfilled by hand to ensure that no badgers or kit fox are trapped in the den. • If an active natal den is detected on the site, the BLM Authorized Officer and CDFW shall be contacted within 24 hours to determine the 	<p>MM 3.4-1i</p>
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		<p>appropriate course of action to minimize the potential for harm or mortality. The course of action would depend on the age of the pups, location of the den on the site (e.g., is the den in a central area or in a perimeter location), status of the perimeter site fence (completed or not), and the pending construction activities proposed near the den. A 500-foot no-disturbance buffer shall be maintained around active natal dens.</p> <ul style="list-style-type: none"> • The following measures are required to reduce the likelihood of distemper transmission: <ul style="list-style-type: none"> a. No pets shall be allowed on the site prior to or during construction, with the possible exception of kit fox scat detection dogs during preconstruction surveys, and then only with prior CDFW approval; b. Any kit fox hazing activities that include the use of animal repellents such as coyote urine must be cleared through CDFW prior to use; and c. Any documented kit fox mortality shall be reported to CDFW and the BLM Authorized Officer within 24 hours of identification. If a dead kit fox is observed, it shall be retained and protected from scavengers until CDFW determines whether the collection of necropsy samples is justified. 	
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<p>Biological Resources</p>	<p>MM BIO-21</p>	<p>Vegetation Best Management Practices. The applicant shall undertake the following measures to manage the construction site and related facilities in a manner to avoid or minimize impacts to vegetation resources:</p> <ul style="list-style-type: none"> • Limit Area of Disturbance. The boundaries of all areas to be disturbed (including staging areas, access roads, and sites for temporary placement of spoils) shall be delineated with stakes and flagging prior to construction activities in consultation with the Designated Biologist. Spoils and topsoil shall be stockpiled in disturbed areas within the project area. Parking areas and staging and disposal site locations shall similarly be located in areas without native vegetation or special-status species habitat. All disturbances, project vehicles, and equipment shall be confined to the flagged areas. • Minimize Road Impacts. New and existing roads that are planned for construction, widening, or other improvements shall not extend beyond the flagged impact area as described above. All vehicles passing or turning around would do so within the planned impact area or in previously disturbed areas. Where new access is required outside of existing roads or the construction zone, the route shall be clearly marked (i.e., flagged and/or staked) prior to the onset of construction. • Minimize Traffic Impacts. Vehicular traffic during project construction and operation shall be confined to existing routes of travel to and from the project area, and cross-country vehicle and equipment use outside designated work areas shall be prohibited. • Monitor During Construction. In areas that have not been fenced with desert tortoise exclusion fencing and cleared, a Designated Biologist shall be present at the construction site during all project construction activities that have potential to disturb soil, vegetation, and wildlife. The Designated Biologist or Biological Monitor shall review areas 	<p>MM 3.3-2</p>
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		<p>immediately ahead of equipment during brushing and grading activities.</p> <ul style="list-style-type: none"> • Minimize Impacts of Staging Areas. Staging areas for construction on the project area shall be within the area that has been fenced with desert tortoise exclusion fencing. For construction activities outside of the solar project area, access roads, pulling sites, and storage and parking areas shall be designed, utilized, and maintained with the goal of avoiding or minimizing impacts to native plant communities and sensitive biological resources. Staging areas outside of the project area shall maintain a minimal disturbance footprint, avoid jurisdictional wetlands, and avoid disturbance to native plant communities whenever possible. • Avoid Use of Toxic Substances. Soil bonding and weighting agents used on unpaved surfaces (per MM 3.2-1) shall be non-toxic to plants and wildlife. • Implement Erosion Control Measures. All erosion control measures promoted by the Lahontan Regional Water Quality Control Board (RWQCB) in its Project Guidelines for Erosion Control (Board Order No R6T-2003-0-04 Attachment G) (Lahontan RWQCB 2003) shall be implemented for all phases of construction and operation where sediment run-off from exposed slopes threatens to enter “waters of the State.” Sediment and other flow-restricting materials shall be moved to a location where they shall not be washed back into drainages. All disturbed soils and roads within the project area shall be stabilized to reduce erosion potential, both during and following construction. Areas of disturbed soils (access and staging areas) with slopes toward a drainage shall be stabilized to reduce erosion potential. To avoid impacts associated with generation of fugitive dust, surface application of water would be employed during construction and operation and 	
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		<p>maintenance activities.</p> <ul style="list-style-type: none">• Monitor Ground-Disturbing Activities Prior to Preconstruction Site Mobilization. If preconstruction site mobilization requires ground-disturbing activities such as for geotechnical borings or hazardous waste evaluations, a Designated Biologist or Biological Monitor shall be present to monitor any actions that could disturb soil, vegetation, or wildlife.	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

<p>Biological Resources</p>	<p>MM BIO-21</p>	<ul style="list-style-type: none"> • Revegetation of Temporarily Disturbed Areas. The applicant shall prepare and implement a Temporary Disturbance Revegetation Plan to restore all areas subject to temporary disturbance to pre-project grade and conditions. The plan shall be submitted to the BLM and CDFW for review and approval at least 30 days prior to the start of ground-disturbing activities. Temporarily disturbed areas within the project area include, but are not limited to, all proposed locations for linear facilities, temporary access roads, berms, areas surrounding the drainage diffusers, construction work temporary lay-down areas not converted to part of the solar field, and construction equipment staging areas. The Temporary Disturbance Revegetation Plan shall include a description of topsoil salvage and seeding techniques and a monitoring and reporting plan, and plan to achieve the following performance standards by the end of monitoring year 2: <ul style="list-style-type: none"> a. At least 80% of the species observed within the temporarily disturbed areas shall be native species that naturally occur in desert scrub habitats; and b. Relative cover and density of plant species within the temporarily disturbed areas shall equal at least 60% relative to pre-disturbance conditions. 	<p>MM 3.3-2</p>
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<p>Biological Resources</p>	<p>MM BIO-21</p>	<p>• Integrated Weed Management Plan. This measure provides further detail and clarifies requirements for the applicant’s draft IWMP. Prior to beginning construction on the project, the applicant shall prepare, circulate to BLM for comment and approval, and then implement an IWMP that meets the approval of BLM’s Authorized Officer and conforms to the CDCA Plan to prevent the spread of existing invasive species and the introduction of new invasive species to the project area. The plan shall be consistent with BLM’s Record of Decision for Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States (BLM 2007) and the 2008-2012 National Invasive Species Management Plan (National Invasive Species Council 2008). The IWMP shall include, at a minimum, specific management objectives and measures for each target invasive species, baseline conditions, weed risk assessment, measures (both preventative and containment/control) to prevent/limit the introduction and spread of invasive species, monitoring and surveying methods, and reporting requirements. The BLM-approved IWMP shall include:</p> <ul style="list-style-type: none"> a. Preventative measures to prevent the spread of weeds into new habitats, such as equipment inspections, use of weed-free erosion control materials and soils, and a mandatory site training element that includes weed management; b. Weed containment and control measures such as the removal of invasive species primarily via mechanical means, with the use of herbicides restricted to BLM-policies and approved usage (e.g., BLM’s Herbicide Use Standard Operating Procedures provided in Appendix B of the Record of Decision for the Final Vegetation Treatments Using Herbicides Programmatic Environmental Impact Statement (BLM 2007); c. Monitoring and reporting standards annually during construction and 	<p>MM 3.3-2</p>
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		<p>for 3 years following the completion of construction to describe trends in weed distribution and direct weed management measures, and;</p> <p>d. Reporting of monitoring and management efforts in annual reports and a final monitoring report completed at the end of 3 years of postconstruction monitoring. Copies of these reports will be provided to BLM for review and comment. BLM will use the results of these reports to determine whether any additional monitoring or control measures are necessary. Weed control will be ongoing on the project area for the life of the project, but plan success will be determined by BLM after the 3 years of operations monitoring through the reporting and review process. Success criteria will be defined as having no more than a 10% increase in a weed species or in overall weed cover in any part of the project area.</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Biological Resources	MM BIO-22	Final Closure Plan. At least 12 months prior to project closure, the applicant shall prepare a Final Closure Plan to restore the site's topography and hydrology to a relatively natural condition and to establish native vegetation communities within the project area. The Final Closure Plan shall include a cost estimate for implementing the proposed decommissioning and reclamation activities, and shall cover the estimated cost as though BLM were to contract with a third party to decommission the project and reclaim the project area. The plan shall be subject to review and revisions from the BLM Authorized Officer in consultation with USFWS and CDFW.	MM 3.3-5
Biological Resources	MM BIO-23	Artificial Water Sources. The project will design and install at least five new artificial water sources for desert bighorn sheep to use. The location, design, and method of installations will be determined in cooperation with CDFW and BLM and the ultimate plan will be approved by CDFW and BLM. The locations may be on private or public lands but must be located within 5 miles of the project boundary to mitigate this metapopulation. Because the I-15 wildlife overcrossing will be installed adjacent to the site, water structure installations should occur on both sides on I-15 with a possible preference for one proximate to the overcrossing structure. The project shall establish a non-wasting endowment to monitor and maintain the water features in perpetuity.	MM 3.4-3a

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Biological Resources	MM BIO-24	Compensatory Mitigation. If MM-BIO-12 (Desert Tortoise Compensatory Mitigation) is adhered to and occurs within approximately 1 kilometer of desert bighorn sheep-occupied or CDFW-identified/modeled desert bighorn sheep habitat, then no additional compensatory habitat mitigation would be required as the acquired habitat would also satisfy the foraging needs of desert bighorn sheep. However, if the mitigation lands acquired for MM-BIO-12 do not satisfy this requirement, then separate compensatory mitigation for loss of desert bighorn sheep foraging habitat (i.e., all lands east of I-15 that are fenced in) at a 1:1 ratio meeting all of the other requirements (i.e., requirements for acquisition, initial improvement, and long-term management of compensation lands) and protections afforded under MM-BIO-12 will be required.	N/A
Biological Resources	MM BIO-25	Mitigation and Monitoring Plan. Prior to site disturbance, the project will prepare a desert bighorn sheep mitigation and monitoring plan. The plan will be approved by CDFW and BLM. This plan will require monitoring of wildlife crossings, fencing effectiveness, water sources, and all other implemented mitigation measures for a minimum of 8 years with an annual monitoring report provided to CDFW by January 31, and a final report covering the entire monitoring period (i.e., at least 8 years) by January 31st of the final year. Components of this requirement may be modified if already covered by other monitoring efforts (e.g., Brightline, Caltrans). The plan will include the methods for monitoring, identify what is being monitored, identify the goals of the measures, methods for determining the effectiveness of the measures, and remedial triggers and measures if the mitigation does not meet the goals.	N/A

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Biological Resources	MM BIO-26	Limited Operating Period. Noises greater than 85 A-weighted decibels (dBA) maximum sound level (Lmax) will not be allowed within 500 meters of the hinge point (10% slope line) between December 1 and June 30. If loud work must occur, even briefly, then the project must get CDFW concurrence that the desert bighorn sheep lambing period is done or verify, in coordination with CDFW, that there are no desert bighorn sheep on the facing slope within a distance that would be expected to be subject to an 85 dBA Lmax sound level. If the project believes that they may need to ultimately perform loud work during the lambing period, then they shall coordinate with CDFW early (i.e., ideally as soon as possible, but minimally before the lambing period) to determine how much additional desert bighorn sheep-specific monitoring will be needed for CDFW to evaluate whether the request is feasible. Simply monitoring a week or two in advance will not provide enough data to perform the evaluation.	N/A
Biological Resources	MM BIO-27	Work Boot Decontamination. All construction personnel will be trained on the importance of and procedures for decontaminating boots to prevent transmission of disease from domesticated sheep and goats to desert bighorn sheep. In addition, all quarry workers who have potential contact with domesticated sheep and/or goats (for example at farms, fairs, etc.) will be identified and shall decontaminate work boots prior to entering the project area. Decontamination shall involve scrubbing the soles of work boots with a 10% bleach solution to remove all organic matter and kill pathogens. Alternatively, footwear may be changed to ensure that potentially contaminated footwear does not enter any quarry area.	N/A

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Cultural Resources	APM CUL-1	Prior to any ground disturbing activities, the Applicant shall retain a qualified archaeologist, defined as one meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology and subject to approval by the BLM, to conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of cultural resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources. The Applicant shall ensure that all construction personnel are made available for and attend the training and shall retain documentation demonstrating attendance.	MM 3.6-1
Cultural Resources	APM CUL-2	A Cultural Resources Discovery and Monitoring Plan (CRDMP) shall be developed at least 30 days prior to ground disturbing activities and implemented by an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards for archaeology. The CRDMP shall detail provisions for the archaeological monitoring of Project construction. Archaeological monitoring during ground-disturbing activities shall be conducted by an archaeologist familiar with the types of historic and prehistoric resources that could be encountered within the APE, who shall have the authority to halt construction in the event of a discovery. The archaeological monitor shall work under the direct supervision of the qualified archaeologist. All cultural resources personnel will be approved by the BLM.	MM 3.6-2

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Cultural Resources	APM CUL-2	The CRDMP shall detail procedures for halting construction, making appropriate notifications to agencies, officials, and Native Americans, and assessing National Register- and California Register-eligibility in the event that unknown cultural resources are discovered during construction. The CRDMP shall require that the contractor immediately cease all work activities in the area (within 100 feet) of the discovery until it can be evaluated by a qualified archaeologist. After cessation of excavation, the contractor shall immediately contact the BLM Archaeologist. The contractor shall not resume work until authorization from the BLM is received.	MM 3.6-2
Cultural Resources	APM CUL-2	If the qualified archaeologist, in consultation with BLM, determines that the discovery constitutes a historic property per Section 106 of the National Historic Preservation Act or a historical or unique archaeological resource under the California Environmental Quality Act, preservation in place shall be the preferred manner of mitigation (Public Resources Code §21083.2). In the event preservation in place is demonstrated to be infeasible, a treatment plan shall be prepared by the qualified archaeologist and shall be approved by the BLM prior to implementation. The BLM shall consult with appropriate Native American representatives in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature. Archaeological materials recovered during any investigation shall be curated at an accredited curational facility. The CRDMP shall include provisions for reporting of monitoring and any treatment of resources in a timely manner.	MM 3.6-2

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Cultural Resources	APM CUL-3	If human remains are discovered during construction, all work shall be diverted from the area of the discovery and the BLM Authorized Officer shall be informed immediately. The BLM shall ensure that any Native American human remains, funerary objects, sacred objects, and/or objects of cultural patrimony discovered on BLM administered lands during implementation of the Project will be treated in accordance with the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) (Pub. L. 101-601, 25 USC § 3001 et seq.) and 43 CFR Section 10. Avoidance and protection of inadvertent discoveries that contain human remains through Project redesign shall be the preferred protection strategy.	MM 3.6-3
Geology and Soils	APM GEO-1	After construction completion, the BLM shall monitor disturbed areas where clearing, grubbing, and cut-and-fill shall be compacted once construction is complete for greater resistance to wind erosion.	APM 13
Geology and Soils	APM GEO-2	During construction, facilities will be built in accordance with San Bernardino County and California State Building Code requirements applicable to “Seismic Zone 3.” No human-occupied structures will be placed across the trace of a documented active fault. No human-occupied structure will be placed within 50 feet of the trace of an active fault or within a seismic special studies zone without a fault evaluation report, satisfactory to the State Geologist, demonstrating that no undue hazard would be created by the construction or placement of the structure.	APM 11
Geology and Soils	APM GEO-3	Roads shall be constructed at grade to maintain existing drainage patterns during storm events. Unpaved access roads shall be constructed of compacted native soils. Rock or gravel may be added to unpaved roads for stabilization to prevent rutting or erosion.	APM 12

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Geology and Soils	APM GEO-4	The project stormwater pollution prevention plan or best management practices (BMP) plan required by Lahontan Regional Water Quality Control Board (RWQCB) for compliance with its General Permit R6T-2003-0004 and prepared consistent with its Project Guidelines for Erosion Control (Board Order No R6T-2003-0-04 Attachment G; Lahontan RWQCB 2003) shall be prepared and submitted to the BLM and County for review by a watershed specialist, hydrologist, and/or engineer from each lead agency before implementation. Reports shall be submitted 30 days prior to ground-disturbing activities. Erosion control and drainage plans for new and existing roads to be utilized for the project shall be aimed at maintaining to the greatest extent feasible existing soil quality and integrity. In developing the plan, the applicant or its contractor shall consult with the BLM and the County to determine the appropriate soil quality objective(s) to be met following construction (for temporary construction disturbances) and following decommissioning (for total site restoration). As part of the erosion control and drainage plans, the applicant and/or its contractor shall implement an appropriate combination of BMPs in order to meet or exceed the applicable soil quality objective(s) (e.g., maintain or enhance soil quality and function).	MM 3.7-1
Geology and Soils	APM GEO-4	All measures and facilities for controlling runoff and erosion shall be in place prior to ground-disturbing activities. Desert tortoise fencing shall be installed consistent with APM BIO-28, which requires approved design to ensure a minimum impact to existing washes and to limit any substantial increase of erosion or sediment transport. Any desert tortoise fencing that creates substantial excess soil shall have straw wattles or other measures installed to prevent soil transport.	MM 3.7-1

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Geology and Soils	APM GEO-4	All erosion control facilities shall be monitored immediately following a qualified storm event. A major rainfall event is defined as one for which flow is visibly detectable within the fenced drainage. All repairs shall be completed prior to the commencement of ground disturbing activity. Any erosion control facilities that are damaged by rainfall shall be repaired within 72 hours of any damage and shall be monitored after any precipitation. Clearance reports and inspection logs shall be submitted to the BLM and the County. Substantial damage to erosion control facilities shall be reported to the BLM and the County and per the above, no ground disturbing activity shall restart until the facilities are repaired.	MM 3.7-1

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

<p>Geology and Soils</p>	<p>APM GEO-5</p>	<p>Prior to construction of project facilities, a qualified California-licensed geotechnical engineer shall prepare and submit to BLM a final geotechnical investigation that provides design requirements for foundations, retaining walls/shoring, and excavation, compliant with the applicable seismic design standards in the CBC. The scope of the geotechnical report shall include the solar array fields, collection line routes, substation and switchyard site, and the operation and maintenance buildings sites. The geotechnical investigation shall expand upon the preliminary investigations as necessary and identify and evaluate the presence of expansive, compressible, liquefiable, or mechanically unstable soils and, if present, shall make recommendations for site preparation or design necessary to avoid or reduce adverse structural impacts. Structural foundations shall not be founded on engineered fill, nor on native soil, unless it is demonstrated that the soils would be adequate to support the foundation. A California-licensed geotechnical engineer shall be retained by the applicant to be present on the project site during excavation, grading, and general site preparation activities to monitor the implementation of the recommendations specified in the geotechnical investigation. When/if needed, the geotechnical engineer shall provide structure-specific geologic and geotechnical recommendations that shall be documented in a report approved by the permitting agency.</p>	<p>MM 3.7-2</p>
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Geology and Soils	APM GEO-6	<p>Grading and other methods of ground disturbance in areas covered by desert pavement shall be avoided or minimized. If avoidance of these areas is not possible, the desert pavement surface shall be protected from damage or disturbance from construction vehicles by use of temporary mats on the surface. A Desert Pavement Identification, Avoidance, and Protection Plan shall be prepared and submitted to the BLM for review and approval at least 60 days prior to start of construction which shall include, at a minimum:</p> <ol style="list-style-type: none"> 1. A preconstruction survey using accepted methodology to identify areas covered by desert pavement; 2. Identification of areas covered by desert pavement that can feasibly be avoided and methods for avoidance, such as through placement of project structures during final design, flagging and/or fencing areas of desert pavement for avoidance, and/or other measures; 3. Identification of areas covered by desert pavement that cannot feasibly be avoided and methods for protection, including at a minimum the use of temporary mats on the surface. Other methods may include restrictions on vehicle weight in addition to the use of mats. 	MM 3.7-4
Geology and Soils	APM GEO-7	<p>A Project Paleontologist listed as a Principal Investigator on a current California BLM Permit for Paleontological Investigations who meets or exceeds the standards of the BLM will be retained to oversee the execution of all paleontological mitigation measures. The Project Paleontologist shall obtain a curatorial arrangement with a qualified repository prior to construction in the event of significant paleontological resource discoveries during construction.</p>	MM 3.12-3

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Geology and Soils	APM GEO-8	The Project Paleontologist shall develop Worker Environmental Awareness Program training to educate the project personnel on the legal requirements for preserving fossil resources, the recognition of the types of paleontological resources that could be encountered within the requested right-of-way boundary, and the procedures to be followed in the event of a fossil discovery. This training program shall be given by the Project Paleontologist or their designee to the crew before ground-disturbing work commences and shall include handouts to be given to new workers as needed.	MM 3.12-3
Geology and Soils	APM GEO-9	The Project Paleontologist will develop a comprehensive paleontological resources monitoring and mitigation plan (PRMMP) that incorporates the latest project description, engineering plans, and project site. The PRMMP will consider the results of previous paleontological resources assessments, including but not limited to the results of the geologic map review, geotechnical investigation, scientific literature review, museum records searches, reconnaissance surveys, and the accepted provisional paleontological sensitivity classification. The PRMMP will specify locations and depth thresholds that require paleontological monitoring during ground-disturbing activities. The PRMMP will discuss paleontological monitoring of ground-disturbing activities in previously undisturbed sediments identified as having moderate or higher sensitivity, whether present at the surface or anticipated to be present at depth in the subsurface. Geologic units of low and very low paleontological sensitivity, as well as all previously disturbed sediments, regardless of depth, should not be subject to paleontological monitoring unless anticipated to be underlain by previously undisturbed geologic units of relatively higher	MM 3.12-3

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

		<p>paleontological sensitivity that could be impacted by earthwork activities at depth. Appropriate mitigation methods may include full-time paleontological monitoring, screening of sediment samples for small fossils, or additional field surveys in the event of changes to the project site boundaries.</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

<p>Geology and Soils</p>	<p>APM GEO-9</p>	<p>Monitoring will be conducted by a BLM-approved paleontological monitor working under the supervision of a BLM-permitted Field Agent or BLM-permitted Principal Investigator (i.e., the Project Paleontologist) in the field, with the overall implementation of the PRMMP overseen by a BLM-permitted Principal Investigator. If field observations of surface or subsurface geologic conditions during construction activities would indicate a differing paleontological sensitivity ranking than that previously assigned, the Project Paleontologist may consult with the BLM, the California Department of Fish and Wildlife (CDFW), other relevant overseeing agencies, and Soda Mountain Solar, LLC, to recommend adjustments to the level of monitoring in response to subsurface conditions. Full-time (or on-site) monitoring can be reduced to part-time inspections (or spot checks) or ceased entirely if this is determined adequate by the Project Paleontologist and approved by all parties. This change can be done verbally and then documented via email or another written format to the BLM, CDFW, other relevant overseeing agencies, and Soda Mountain Solar, LLC. The paleontological monitor will have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find and, should the Project Paleontologist or Field Agent determine that the fossils are potentially significant, professionally and efficiently recover the fossil specimens for laboratory evaluation, and collect associated data following the procedures and guidelines of the BLM (2008a) and in accordance with the requirements stipulated in the California BLM Permit for Paleontological Investigations and Fieldwork Authorization permit(s). Nonsignificant fossils will be documented and recorded in the field but</p>	<p>N/A</p>
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

		<p>not collected. Any potentially significant fossil that is collected for further evaluation will be returned to the discovery site or retained for educational purposes if after laboratory analysis it is determined to be a nonsignificant resource. The disposal of the fossil will depend on the requirements of the agency administering the land on which the fossil was discovered. Paleontological monitors will record pertinent geologic and geographic data from any fossil localities.</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Geology and Soils	APM GEO-10	In the event of a fossil discovery, whether by the permitted and approved paleontological field staff or a member of the construction crew, all work will cease in a 50-foot radius of the find while the Project Paleontologist or Field Agent assesses the significance of the fossil and documents its discovery. Should the Project Paleontologist or Field Agent determine that the fossil locality is potentially significant, it will be salvaged following the procedures and guidelines of the BLM (BLM 2008a) and in accordance with the requirements stipulated in the California BLM Permit for Paleontological Investigations and Fieldwork Authorization permit(s). Nonsignificant fossils will be documented and recorded in the field but not collected. Potentially significant fossils that were collected in the field that were determined to be nonsignificant after laboratory analysis will be returned to the site or retained for educational purposes (depending on the requirements of the overseeing agency administering the land on which the fossil was discovered). Significant fossils will be prepared to the point of morphological identification and/or taxonomic identification to facilitate the requirements of the curation in an accredited repository pre-approved by the BLM, CDFW, and/or another overseeing agency.	MM 3.12-4
Geology and Soils	APM GEO-11	Upon conclusion of ground-disturbing activities, the Project Paleontologist will prepare a final report detailing the methods and results of implementing the PRMMP, including full documentation of scientifically significant fossils found, significance assessment of those fossils, repository details for significant fossils, and any recommendations for future work within the project site. If paleontological resources are curated, the final monitoring report and any associated data pertinent to the curated specimen(s) should be	MM 3.12-3

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

		submitted to the designated repository. A copy of the final monitoring report should be filed with the BLM, CDFW, and/or another overseeing agency.	
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<p>Hazards & Hazardous Materials</p>	<p>APM AIR-1</p>	<p>Fugitive Dust Control Plan. The applicant shall prepare and implement a Fugitive Dust Control Plan to address fugitive dust emissions during project construction, operation, maintenance, and future decommissioning. The plan shall include measures to minimize fugitive dust emissions from development of laydown and staging areas, site grading, vegetation management, and installation of all project facilities through postconstruction cleanup. The applicant shall take every reasonable precaution to prevent all airborne fugitive dust plumes from leaving the project and to prevent visible particulate matter from being deposited upon public roadways. The applicant shall submit the plan to Mojave Desert Air Quality Management District for review and approval no less than 60 days prior to the start of construction. The applicant shall incorporate the plan into all contracts and contract specifications for construction work. The Fugitive Dust Control Plan shall identify a Dust Control Supervisor that shall have the authority to expeditiously employ sufficient dust mitigation measures. The Dust Control Supervisor shall be on the site or available on-site within 30 minutes during working hours and shall have the authority to implement enhanced (contingency) measures if dust plumes are visible beyond the property line, which indicates that existing mitigation measures are not resulting in effective mitigation. The following measures would be included within the plan:</p> <ul style="list-style-type: none"> • During construction, all unpaved roads, disturbed areas (e.g., areas of scraping, excavation, backfilling, grading, and compacting), and loose materials generated during construction activities shall be stabilized with a non-toxic soil stabilizer or soil weighting agent or watered two times daily or as frequently as necessary to minimize fugitive dust generation. Non-water-based soil stabilizers shall be as efficient as or more efficient for fugitive dust control than California Air 	<p>N/A</p>
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		<p>Resources Board-approved soil stabilizers and shall not increase any other environmental impacts, including loss of vegetation, adverse odors, or emissions of ozone precursor reactive organic gases or volatile organic compounds.</p> <ul style="list-style-type: none"> • For long-term site operations, the applicant shall establish a Site Operations Dust Control Plan, which includes all applicable fugitive dust control measures identified for operations activities. The Site Operations Dust Control Plan shall include the use of durable non-toxic soil stabilizers on all regularly used unpaved roads, shall restrict vehicular access to established unpaved travel paths within the project boundaries, and shall include the long-term inspection and maintenance procedures that will be undertaken to ensure that the unpaved roads remain stabilized. • The main access roads through the site shall be either paved or stabilized using soil binders, or equivalent methods, to provide a stabilized surface that is similar for the purposes of dust control to paving, that may or may not include a crushed rock (gravel or similar material with fines removed) top layer, prior to initiating construction. Delivery, laydown, and staging areas for construction or O&M supplies shall be paved or treated prior to taking initial deliveries. • Grading and earthwork activities, including vegetation removal, cut and fill movement, and soil compacting, shall be phased across the site to minimize the amount of exposed or disturbed area on any single day. • No vehicle shall exceed 15 miles per hour on unpaved areas within the construction site, with the exception that vehicles may travel up to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions. • Visible speed limit signs shall be posted at the construction site 	
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		<p>entrances.</p> <ul style="list-style-type: none">• All construction equipment vehicle tires shall be cleaned free of dirt prior to entering paved roadways to prevent track-out from extending 25 feet or more in cumulative length from the point of origin from an active operation. Actions, including but not limited to sweeping sealed roads, use of stabilized construction/facility entrances, and, if needed, using one or more entrance/exit vehicle tire wash apparatuses, shall be taken to prevent project-related track-out.• All unpaved exits from the construction site shall be graveled or treated to prevent track-out onto public roadways.• All paved roads within the construction site shall be swept daily or as needed (less during periods of precipitation) on days when construction activity occurs to prevent the accumulation of dirt and debris.• At least the first 500 feet of any paved public roadway exiting the construction site or exiting other unpaved roads to access the construction site or staging areas shall be swept as needed when dirt or runoff resulting from the construction activities is visible on the paved public roadway.	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

<p>Hazards & Hazardous Materials</p>	<p>APM BIO-21</p>	<p>Use of chemicals, fuels, lubricants, or biocides will comply with all local, state, and federal regulations. This is necessary to minimize the possibility of contamination of habitat or primary or secondary poisoning of badgers and other predators utilizing adjacent habitats, and the depletion of American badger prey. All uses of such compounds should observe label and other restrictions mandated by the EPA, California Department of Food and Agriculture, and other state and federal legislation. If rodent control must be conducted, the use should be restricted to interiors of buildings and zinc phosphide should be used because of the lower risk of poisoning burrowing mammals.</p>	<p>N/A</p>
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<p>Hazards & Hazardous Materials</p>	<p>APM FIRE-1</p>	<p>The applicant shall prepare and implement a Fire Management and Prevention Plan to ensure the safety of workers and the public during construction, O&M, and future decommissioning activities for the project. The owner must provide the Fire Management and Prevention Plan to the BLM for review and approval and to the San Bernardino County Fire Department for review and comment before construction. The Fire Management and Prevention Plan shall include, but not be limited to, the following elements:</p> <ul style="list-style-type: none"> • Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, and hot work restrictions. • Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days. • All internal combustion engines used at the project site shall be equipped with spark arrestors. Spark arrestors shall be in good working order. • Once initial two-track roads have been cut and initial fencing completed, light trucks and cars shall be used only on roads where the roadway is cleared of vegetation. • Mufflers on all cars and light trucks shall be maintained in good working order. • Fire rules shall be posted on the project bulletin board at the contractor's field office and areas visible to employees. • Equipment parking areas and small stationary engine sites shall be cleared of all flammable materials. • Smoking shall be prohibited in all vegetated areas and within 50 feet of combustible materials storage and shall be limited to paved areas or areas cleared of all vegetation. 	<p>MM 3.20-1</p>
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		<ul style="list-style-type: none"> • The construction site (if construction occurs simultaneously at various locations) shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires. • The applicant shall coordinate with the BLM and the San Bernardino County Fire Department to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur at the project site. • All construction workers, plant personnel, and maintenance workers visiting the plant and/or transmission lines to perform maintenance activities shall receive training on fire prevention procedures, the proper use of fire-fighting equipment, and procedures to be followed in the event of a fire. Training records shall be maintained and be available for review by the BLM and the San Bernardino County Fire Department. Fire prevention procedures shall be included in the project's Worker Environmental Awareness Program (Mitigation Measure BIO-2). • Vegetation near all solar panel arrays, ancillary equipment, and access roads shall be controlled through periodic cutting and spraying of weeds, in accordance with the Weed Management Plan. • The BLM and the San Bernardino County Fire Department shall be consulted during plan preparation and fire safety measures recommended by these agencies included in the plan. • The plan shall list fire prevention procedures and specific emergency response and evacuation measures that would be required to be followed during emergency situations. • All on-site employees shall participate in annual fire prevention and response training exercises with the BLM and the San Bernardino County Fire Department. • The plan shall list all applicable wildland fire management plans and 	
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		<p>policies established by state and local agencies and demonstrate how the project will comply with these requirements.</p> <ul style="list-style-type: none"> • The applicant shall designate an emergency services coordinator from among the fulltime on-site employees who shall perform routine patrols of the site during the fire season equipped with a portable fire extinguisher and communications equipment. The applicant shall notify the BLM and the San Bernardino County Fire Department of the name and contact information of the current emergency services coordinator in the event of any change. • Remote monitoring of all major electrical equipment (transformers and inverters) will screen for unusual operating conditions. Higher than nominal temperatures, for example, can be compared with other operational factors to indicate the potential for overheating which under certain conditions could precipitate a fire. Units could then be shut down or generation curtailed remotely until corrective actions are taken. • Fires ignited on-site shall be immediately reported to the BLM and the San Bernardino County Fire Department. • The engineering, procurement, and construction contract(s) for the project shall provide reference to or clearly state the requirements of this measure. 	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

<p>Hazards & Hazardous Materials</p>	<p>APM HAZ-1</p>	<p>An Environmental Inspection and Compliance Monitoring program and plan for construction and operation will be developed and implemented to ensure that hazardous materials are properly stored and potentially hazardous waste is properly disposed of. A Project Environmental Manager will be designated to oversee the program and plan. All contractors and employees will be educated about hazardous materials storage, waste sorting, appropriate recycling storage areas, and reduction of landfill waste. The Environmental Inspection and Compliance Monitoring program and plan shall include, but not be limited to, the following elements:</p> <ul style="list-style-type: none"> • On-site fueling specifications. On-site fueling of equipment and vehicles shall be completed in areas at least 100 feet away from drainages or in designated fueling areas. Fuel stored on-site will be in areas with secondary containment, unless secondary containment is built into the tank. • Conductor installation guidance. During conductor installation, guard structures consisting of temporary H-frame poles shall be erected over any natural or human-made obstacles to shield them from falling objects. • Transformer inspection. Transformers shall be inspected for oil leakage on a regular basis, and diversionary structures shall be provided for all oil-containing equipment, including transformers, at the project site. 	<p>APM 23, APM 24, APM 27</p>
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

<p>Hazards & Hazardous Materials</p>	<p>APM HAZ-2</p>	<p>A Hazardous Materials Management Plan will be prepared, and all construction crews, contractors, and operations crews will be briefed on the plan prior to starting work on the project. All fuels, fluids, and components with hazardous materials/wastes will be handled in accordance with applicable regulations. All such materials shall be kept in segregated storage with secondary containment as necessary. MSDSs for all hazardous materials stored on-site shall be retained on-site during project construction and operation. The project will maintain all records of storage and inspection and will provide for proper off-site disposal.</p>	<p>APM 22</p>
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
<p>Hazards & Hazardous Materials</p>	<p>APM HAZ-3</p>	<p>Health, Safety, and Noise Plan. A Health, Safety, and Noise Plan shall be prepared in compliance with all OSHA and Cal OSHA guidelines. Prior to start of construction, all construction crews and contractors shall be briefed on the plan prior to starting work on the project. The plan shall address health and safety issues associated with normal and unusual (emergency) conditions and shall include a respiratory protection program. The plan shall include, but not be limited, to the following information and guidance:</p> <ul style="list-style-type: none"> • Environmental health and safety protocol (including, but not limited to, hazards of valley fever, including the symptoms, proper work procedures, when and how to use personal protective equipment, and informing supervisors of suspected symptoms of work-related valley fever) • An emergency response plan • Worker Education and Awareness Program training, which would include environmental, cultural, health, and safety training. • Noise/ear protection protocol • First aid training • Fire protection and extinguisher maintenance, guidance, and documentation <p>Disposal of hazardous materials and waste guidance in accordance with local, state, and federal regulations.</p>	<p>APM 25, APM 26</p>

<p>Hydrology and Water Quality</p>	<p>APM HWQ-1</p>	<p>Prior to site mobilization, the applicant shall submit a Drainage, Erosion, and Sedimentation Control Plan (DESCP) to the CDFW and the BLM for managing stormwater during project construction and operations. The DESCPC must ensure proper protection of water quality and soil resources, address exposed soil treatments in the solar fields for both road and non road surfaces, and identify all monitoring and maintenance activities. The plan must also cover all linear project features such as the proposed generation-tie line.</p> <p>The DESCPC shall contain, at a minimum, the elements presented below that outline site management activities and erosion and sediment-control BMPs to be implemented during site mobilization, excavation, construction, and postconstruction (operating) activities.</p> <p>Elements of the DESCPC:</p> <ul style="list-style-type: none"> • Vicinity Map: A map(s), at a minimum scale of 1 inch to 500 feet, shall be provided indicating the location of all project elements with depictions of all significant geographic features including swales, storm drains, drainage concentration points, and sensitive areas. • Site Delineation: All areas subject to soil disturbance for the proposed project shall be delineated showing boundary lines of all construction areas and the location of all existing and proposed structures and drainage facilities. • Clearing and Grading Plans: The DESCPC shall provide a delineation of all areas to be cleared of vegetation and areas to be preserved. The plan shall provide elevations, slopes, locations, and extent of all proposed grading as shown by contours, cross sections, or other means. The locations of any disposal areas, fills, or other special features shall also be shown. Existing and proposed topography shall be illustrated by tying in proposed contours with existing topography. • Clearing and Grading Narrative: The DESCPC shall include a table 	<p>N/A</p>
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		<p>with the estimated quantities of material excavated or filled for the site and all project elements, whether such excavation or fill is temporary or permanent, and the amount of such material to be imported or exported.</p> <ul style="list-style-type: none"> • Erosion Control: The plan shall address exposed soil treatments to be used during construction and operation, including specifically identifying all chemical-based dust palliatives, soil bonding, and weighting agents appropriate for use that would not cause adverse effects to vegetation. BMPs shall include measures designed to prevent wind and water erosion, including the application of chemical dust palliatives after rough grading to limit water use. • Best Management Practices Plan: The DESCOP shall identify on the topographic site map(s) the location of the site-specific BMPs to be employed during each phase of construction (initial grading, project element excavation and construction, and final grading/stabilization). BMPs shall include measures designed to control dust, stabilize construction access roads and entrances, and control stormwater runoff and sediment transport. • Best Management Practices Narrative: The DESCOP shall show the location, timing, and maintenance schedule of all erosion- and sediment-control BMPs to be used before initial grading, during excavations and construction, final grading/stabilization, and operation. Separate BMP implementation schedules shall be provided for each project element for each phase of construction. The maintenance schedule shall include postconstruction maintenance of structural-control BMPs, or a statement provided about when such information would be available. 	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Hydrology and Water Quality	APM HWQ-2	If crossing existing washes is necessary, then at-grade crossings will be constructed to maintain existing flow channels and sediment transport, thereby leaving stormwater runoff volume unchanged.	APM 20
Land Use and Planning	APM LU-1	Prior to the start of construction, the Applicant shall provide cadastral survey data to the BLM for all sections within the requested ROW. All section corners shall be surveyed and monumented, and a record map completed and filed with San Bernardino County to ensure the descriptions for all lands within the Right-of-Way are recorded correctly.	MM 3.9-1
Land Use and Planning	APM LU-2	Prior to issuance of the Notice-To-Proceed, the Applicant shall provide 100 percent design drawings to the BLM for review and approval.	MM 3.9-2
Noise	APM N-1	Construction and decommissioning activities associated with the operation and maintenance buildings and pile driving within 1.5 miles of residences shall not occur between the hours of 10:00 p.m. and 7 a.m., Monday through Saturday, or at any time on Sundays.	MM 3.11-1
Recreation	APM REC-1	Travel Management Area Maps for the project site showing open, closed, and limited travel routes and open off-road vehicles areas shall be updated and printed by the applicant for posting by the BLM during each phase of the project when the status or location of routes and/or open areas changes as a result of project construction, operation and maintenance, and/or decommissioning. These notices and signs shall clearly describe which routes and open areas will be closed temporarily or permanently.	MM 3.13-1

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Transportation	APM TRA-1	<p>Construction Traffic Management Plan: The applicant should prepare a Construction Traffic Management Plan (CTMP) for project construction to minimize adverse effects of project construction traffic. The CTMP may be prepared in consultation with the County of San Bernardino Public Works Department or Caltrans prior to construction activities and identify the following:</p> <ul style="list-style-type: none"> • A breakdown of the number, type, capacity, and dimensions of the construction vehicles that would service the project site • An estimate of the average daily or weekly number of vehicles per vehicle type during each major phase of the work • Routing of passenger/worker vehicles, delivery vehicles, and excavation and construction vehicles <ul style="list-style-type: none"> o Review of site access as well as recommendations of signage and markings as needed so accessibility to the Shell Oil gas station is not affected o Enforcement of routing o Delivery hour restrictions, if applicable o Traffic control methods and when each is required o A contact for complaints and how complaints are to be addressed <p>Traffic control shall be implemented during grading and construction of the project’s main access point from Rasor Road and when large deliveries in wide-load vehicles or a high volume of deliveries occurs. Traffic control may include escort vehicles for wide loads, signage, and/or flaggers. Traffic control should be consistent with the requirements of the Manual of Uniform Traffic Control Devices (Federal Highway Administration 2023). All roadways should always be open to emergency personnel.</p>	APM 31

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar

		<p>Under the proposed plan, the project site would be fenced off with vehicular access via a gate off Razor Road. With APM TRA 2 the applicant would minimize the adverse effects of project construction traffic on access to the Razor OHV recreation area.</p>	
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Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Transportation	APM TRA-2	Recreationalist Access: The proposed solar array areas would be fenced and unavailable to recreationalists. The arrays would block access to Arrowhead Trail Road, which is designated as a closed road by BLM. Razor Road would remain along the southern boundary of the project site and maintain public access to the Razor OHV recreation area. Road signage notifying recreationalists of road closures and alternate routes would be installed as needed. Razor Road would be graded but remain unpaved. The road would conform to BLM specifications and would be approximately 26 feet wide and 2.85 miles long.	N/A
Utilities and Service Systems	APM USS-1	Waste Recycling Plan (WRP). Prior to issuance of a notice to proceed, the project applicant shall submit a WRP to the California Department of Fish and Wildlife and the BLM. At a minimum, the WRP must identify the materials (e.g., solar panels, cardboard, concrete, asphalt, wood) that will be generated by construction and development; the projected amounts of each; the applicable state and local laws and regulations governing waste disposal and recycling (e.g., Department of Toxic Substances Control regulations regarding photovoltaic modules); the measures/methods that will be taken to recycle, reuse, and/or reduce the amount of materials; the facilities and/or haulers that will be utilized; and the targeted project-specific recycling or reduction rate.	N/A

Applicant Proposed Measures & Mitigation Measures Summary – Soda Mountain Solar			
Utilities and Service Systems	APM USS-1	During construction, the project site shall have, at a minimum, two bins: one for waste disposal and the other for the recycling of Construction and Demolition (C&D) materials. Additional bins are encouraged to be used for further source separation of C&D recyclable materials and shall be provided if required by applicable state and local laws. The project applicant shall maintain accurate records (receipts or other types of verification) for recycling of C&D recyclable materials and solid waste disposal; arrangements for such receipts can be made through the franchise hauler. These receipts will be retained to demonstrate compliance with the approved WRP if requested by the agencies and must clearly identify the amount of waste disposal and C&D materials recycled.	N/A
Utilities and Service Systems	APM USS-2	Standard in situ testing (deep percolation tests) would be performed at locations where septic or alternative wastewater disposal systems are proposed. The applicant shall document that any proposed sites for septic or alternative wastewater disposal systems meet all applicable standards, and that documentation shall be made available to BLM.	MM 3.7-3

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 12/17/2025 6:52:52 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Fw: Soda Mountain visual resources- figure question
Attachments: 68347_Viewshed_5mi_20251217.jpg; 68347_KOP_Simulation_Locations_20251217.jpg; 68347_KOP_Simulation_Locations_20251217.pdf; 68347_Viewshed_5mi_20251217.pdf

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Hi! Please see attached for - Added KOP 10 (Q) to both Aesthetics Figures (3.1-3 and 3.1-4).

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Lori Coleman <lori.coleman@swca.com>
Sent: Wednesday, December 17, 2025 10:50 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: RE: Soda Mountain visual resources- figure question

Added KOP 10 (Q) to both Aesthetics Figures (3.1-3 and 3.1-4).

Lori Coleman, PMP
SWCA
C: 610.613.3925
lori.coleman@swca.com

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Wednesday, December 17, 2025 9:29 AM
To: Lori Coleman <lori.coleman@swca.com>
Subject: Re: Soda Mountain visual resources- figure question

Great, thank you!!!

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Lori Coleman <lori.coleman@swca.com>
Sent: Wednesday, December 17, 2025 6:25:15 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: RE: Soda Mountain visual resources- figure question

We'll have this one back to you today too – adding KOP-10 to 3.1-3.

Lori Coleman, PMP
SWCA
C: 610.613.3925
lori.coleman@swca.com

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Tuesday, December 16, 2025 5:33 PM
To: Lori Coleman <lori.coleman@swca.com>
Subject: Fw: Soda Mountain visual resources- figure question

Hi! One more....see below please

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Tuesday, December 16, 2025 2:25:24 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: mc.mca <mc.mca@comcast.net>
Subject: Fw: Soda Mountain visual resources- figure question

Can you update Figure 3.1-3. Preliminary viewpoints and KOP simulation locations from 3-1 Aesthetics - Revision July 2025 to include KOP 10? Once you update and docket it, I can send Visual Resources to formatting.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Michael Clayton <mc.mca@comcast.net>
Sent: Tuesday, December 16, 2025 2:07 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Re: Soda Mountain visual resources- figure question

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Lisa,

Attached is the KOP 10 pdf.

Michael

On Dec 16, 2025, at 1:02 PM, Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov> wrote:

I just sent an invitation.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov
<Outlook-California.png>

From: Michael Clayton <mc.mca@comcast.net>
Sent: Tuesday, December 16, 2025 12:20 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Re: Soda Mountain visual resources- figure question

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Hi Lisa,

Just got out of a dental appointment. I can meet up if you still need to.

Michael

On Dec 16, 2025, at 10:58 AM, Worrall, Lisa@Energy
<Lisa.Worrall@energy.ca.gov> wrote:

Hi Michael, I would like to share my screen during a call to make sure I am selecting the correct figures to add to your section for the figures that are missing.

Thanks. Lisa

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: 224 095 171 908 21

Passcode: FG7c7pu3

Dial in by phone

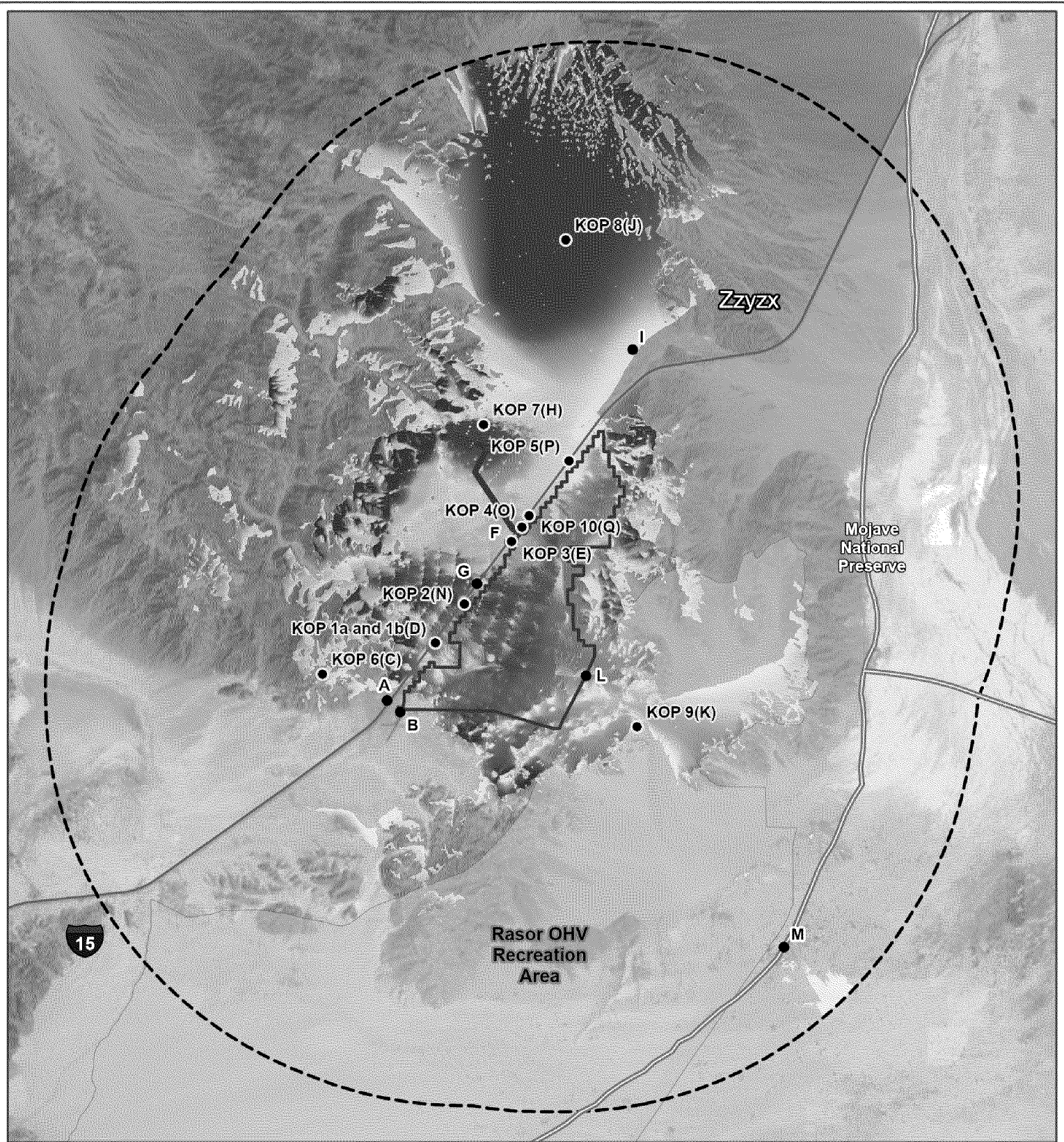
[+1 916-562-1816,,53327470#](tel:+1916562181653327470) United States, Sacramento

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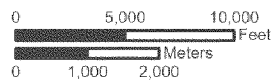
For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

<Mail Attachment.ics>



- Viewpoint
- Key Observation Point (KOP)
- ▭ Project Site
- 5 Mile Visual Analysis Area
- Old Spanish National Historic Trail
- ▭ Rasor Off-Highway Vehicle (OHV) Area
- ▭ Mojave National Preserve
- Viewshed**
- ▭ More panels visible
- ▭ Fewer panels visible

San Bernardino County, CA
 NAD 1983 UTM Zone 11N
 35.1569°N 116.1794°W

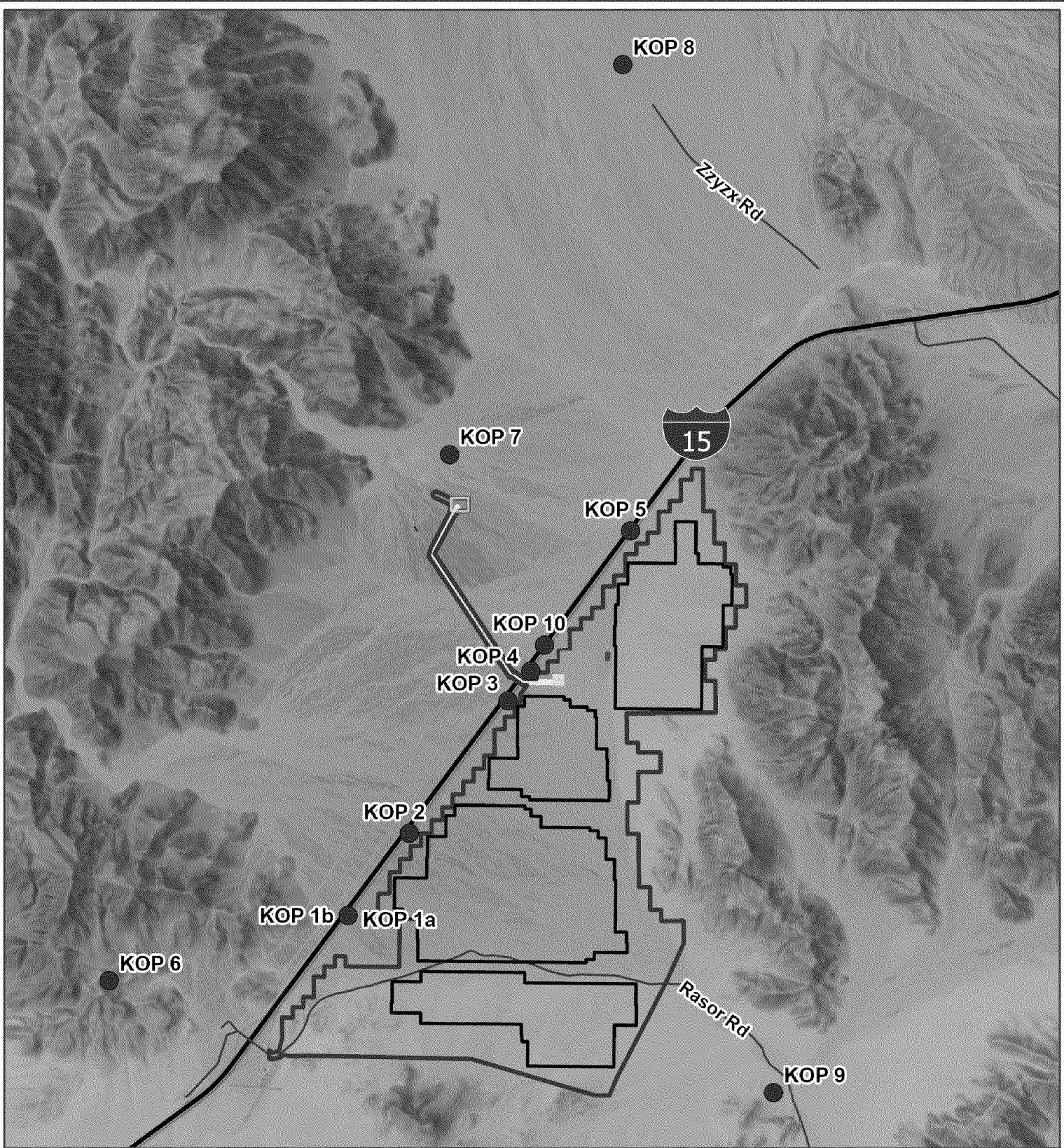


1:130,000



Base Map: Esri ArcGIS Online,
 accessed December 2025
 Updated: 12/17/2025
 Project No. 68347
 Layout: 68347_Viewshed
 Aprx: Visual_Resources

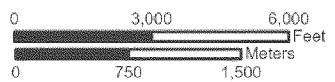
SWCA
 ENVIRONMENTAL CONSULTANTS



- Key Observation Point (KOP)
- Local Road
- U.S. Highway

- Project Components**
- ▭ Solar Array
 - ▭ Proposed BESS Yard
 - ▭ Proposed Substation
 - ▭ Proposed Switchyard
 - ▭ Project Area
 - Proposed O & M Building
 - Gen-Tie Line

San Bernardino County, CA
 NAD 1983 UTM Zone 11N
 35.1738°N 116.1813°W

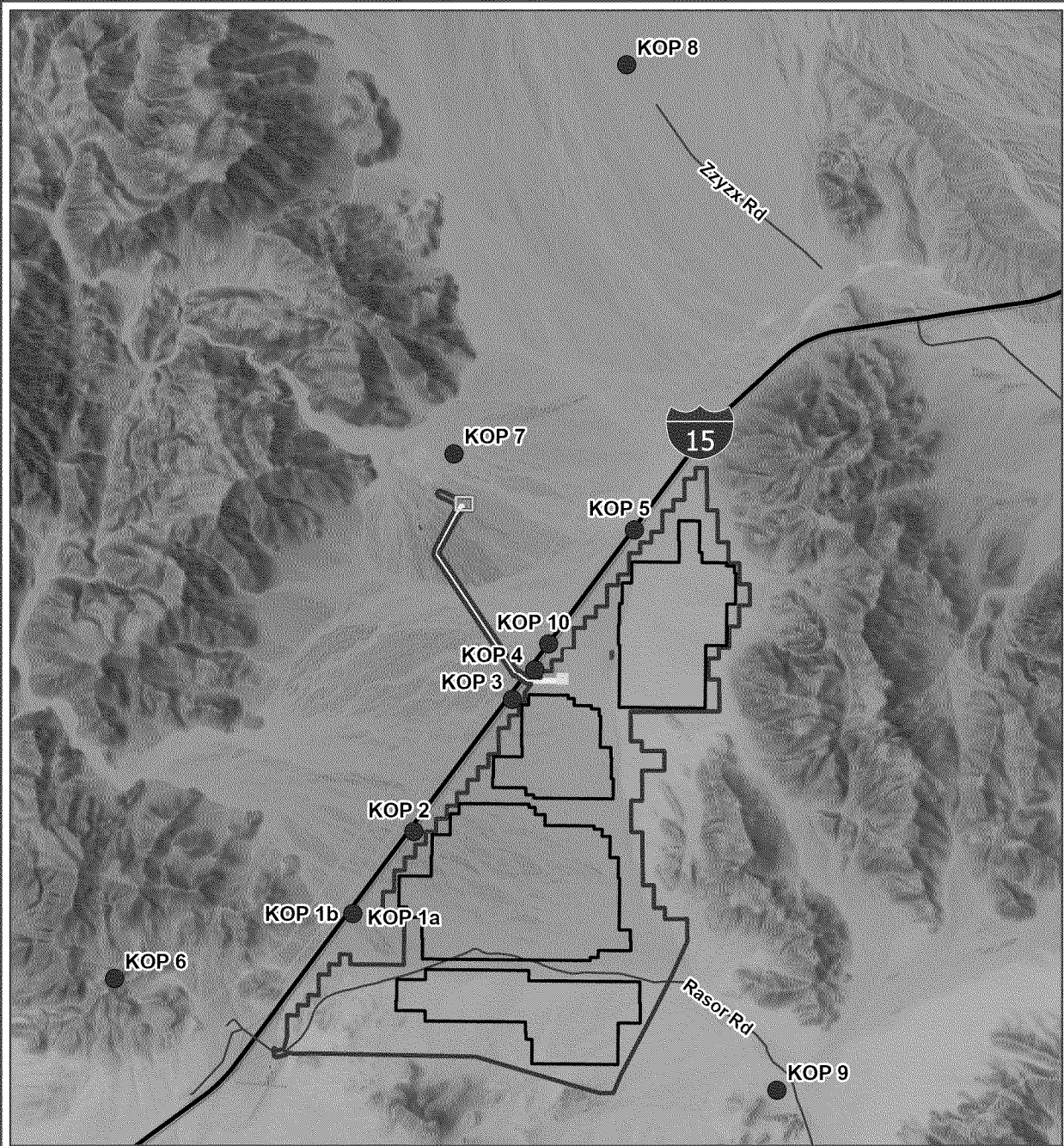


1:62,000



Base Map: Esri ArcGIS Online,
 accessed December 2025
 Updated: 12/17/2025
 Project No. 68347
 Layout: 68347_PhotoAngle_KOP8_v3
 Aprx: Visual_Resources

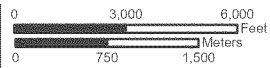
SWCA
 ENVIRONMENTAL CONSULTANTS



- Key Observation Point (KOP)
- Local Road
- U.S. Highway

- Project Components**
- ▭ Solar Array
 - ▭ Proposed BESS Yard
 - ▭ Proposed Substation
 - ▭ Proposed Switchyard
 - ▭ Project Area
 - Proposed O & M Building
 - ⋯ Gen-Tie Line

San Bernardino County, CA
 NAD 1983 UTM Zone 11N
 35.1738°N 116.1813°W

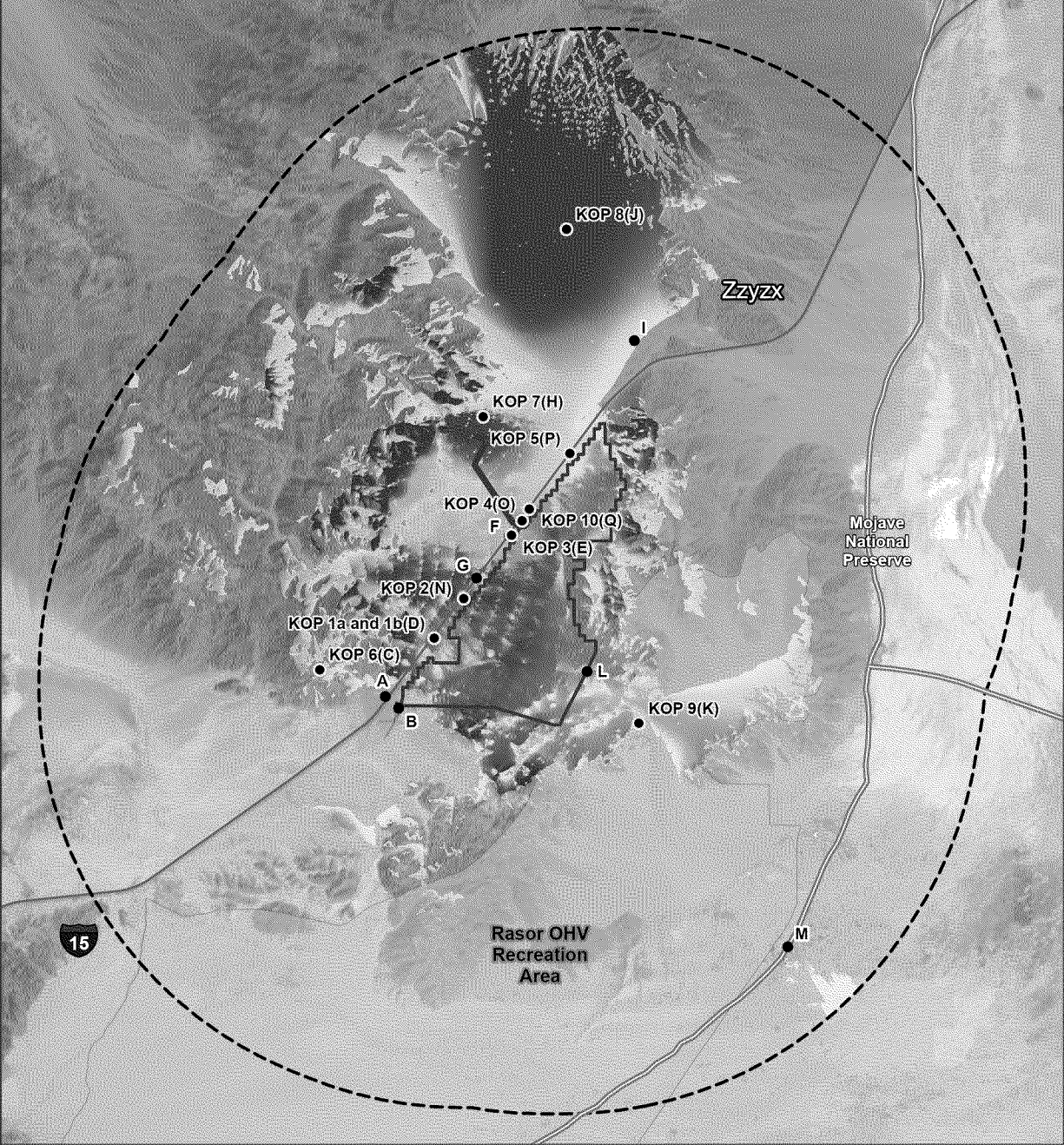


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Base Map: Esri ArcGIS Online,
 accessed December 2025
 Updated: 12/17/2025
 Project No. 68347
 Layout: 68347_PhotoAngle_KOP8_v3
 Aprx: Visual_Resources

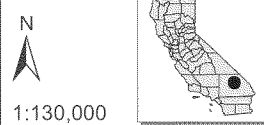
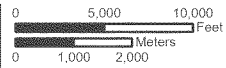
SWCA
 ENVIRONMENTAL CONSULTANTS



- Viewpoint
- Key Observation Point (KOP)
- ▭ Project Site
- ⬡ 5 Mile Visual Analysis Area
- ══ Old Spanish National Historic Trail

- ▭ Rasor Off-Highway Vehicle (OHV) Area
- ▭ Mojave National Preserve
- Viewshed**
- ▭ More panels visible
- ▭ Fewer panels visible

San Bernardino County, CA
 NAD 1983 UTM Zone 11N
 35.1569°N 116.1794°W



Base Map: Esri ArcGIS Online
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 Project No. 68347
 Layout: 68347_Viewshed
 Aprx: Visual_Resources

1:130,000
SWCA
 ENVIRONMENTAL CONSULTANTS

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 12/2/2025 7:12:19 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Fw: Fire Mitigation Letter
Attachments: Mitigation-Soda Mountain v2.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

Here is the draft letter from Fire. We are still waiting to hear back if they have any comments on the BESS layout.

Hannah Arkin

CEO

Resolution Environmental

262 B Avenue, Coronado, CA 92118

760-504-4109



SAN BERNARDINO COUNTY FIRE PROTECTION DISTRICT

598 S. Tippecanoe Ave. • San Bernardino, CA 92415-0179 • (909) 386-8400 • Fax (909) 386-8460

Office of the Fire Marshal
Community Safety Section
sbcfire.org

Daniel R. Munsey
Fire Chief/Fire Warden

Monica S. Ronchetti
Fire Marshal

November 18, 2025

Hannah Arkin, CEO
Resolution Environmental
262 B Avenue
Coronado, CA 92118

Ms. Arkin,

Per your request, the information below summarizes proposed mitigation for all-risks fire services to the project location. In addition to standard fire code requirements, mitigation measures may also include contributions for ongoing fire service delivery.

FIRE CODE

1. Fire Access and Roadway Compliance

- Construct internal and perimeter access roads meeting CFC and SBCFPD Ordinance and standards: 20 ft minimum internal width, 26 ft perimeter width, ≤ 1,000 ft dead-end length, 85 % compaction.
- Ensure four-sided access around all BESS yards and adequate load-rated crossings.

2. Water Supply and Suppression Infrastructure

- Increase total onsite water storage to meet NFPA 1142 rural supply standards.

3. Emergency Preparedness and Operations Fund*

- Establish annual fair share service fee or per-megawatt contribution

FIRE DISTRICT SERVICES

1. Fire Station and Communications Infrastructure

2. Staffing and Specialized Training*

3. Equipment (Fire Apparatus and Special Equipment)

*Annual contributions paid monthly or quarterly

BOARD OF DIRECTORS

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First District

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Second District

Dawn Rowe
Chairman, Third District

Curt Hagman
Fourth District

Joe Baca, Jr.
Vice Chair, Fifth District

Luther Snoke
Chief Executive Officer

Yours in Service,

MONICA S. RONCHETTI, Fire Marshal
San Bernardino County Fire Protection District
Office of the Fire Marshal
mronchetti@sbcfire.org

DRAFT

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 12/3/2025 2:15:06 AM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Fw: Fire Mitigation Letter
Attachments: Mitigation-Soda Mountain v2 12.02.25.pdf

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Hi Lisa,

Attached is the final fire letter and below is the feedback regarding the BESS site plan layout.

Thanks!
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Ronchetti, Monica <mronchetti@SBCFire.org>
Sent: Tuesday, December 2, 2025 5:04 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Munsey, Dan <dmunsey@SBCFire.org>; Washington, Bertral <bWASHINGTON@sbcfire.org>; Anderson, Kelly <kanderson@sbcfire.org>; Allen, Jeffrey <JAllen@SBCFire.org>; Markloff, Curtis <CMarkloff@SBCFire.org>; Strong, Tom <TStrong@SBCFire.org>
Subject: RE: Fire Mitigation Letter

Hi Hannah,

Attached is the revised mitigation letter. Regarding the feedback on the BESS site layout, I discussed the layout with Curtis and the site seems to meet the Fire Code requirements as far as the distance so we do not have any additional comments other than what is already addressed in the letter.

Let me know if you have any questions.

Thank you,

Monica Ronchetti
Fire Marshal
San Bernardino County Fire Protection District
Office of the Fire Marshal
909-386-8401
www.sbcfire.org



SAN BERNARDINO COUNTY FIRE PROTECTION DISTRICT

598 S. Tippecanoe Ave. • San Bernardino, CA 92415-0179 • (909) 386-8400 • Fax (909) 386-8460

Office of the Fire Marshal
Community Safety Section
sbcfire.org

Daniel R. Munsey
Fire Chief/Fire Warden

Monica S. Ronchetti
Fire Marshal

December 2, 2025

Hannah Arkin, CEO
Resolution Environmental
262 B Avenue
Coronado, CA 92118

Ms. Arkin,

Per your request, the information below summarizes proposed mitigation for all-risks fire services to the project location. In addition to standard fire code requirements, mitigation measures may also include contributions for ongoing fire service delivery.

FIRE CODE

1. Fire Access and Roadway Compliance

- Construct internal and perimeter access roads meeting CFC and SBCFPD Ordinance and standards: 20 ft minimum internal width, 26 ft perimeter width, ≤ 1,000 ft dead-end length, 85 % compaction.
- Ensure four-sided access around all BESS yards and adequate load-rated crossings.

2. Water Supply and Suppression Infrastructure

- Increase total onsite water storage to meet NFPA 1142 rural supply standards.

3. Emergency Preparedness and Operations Fund*

- Establish annual fair share service fee or per-megawatt contribution

FIRE DISTRICT SERVICES

1. Fire Station and Communications Infrastructure

2. Staffing and Specialized Training*

3. Equipment (Fire Apparatus and Special Equipment)

*Annual contributions paid monthly or quarterly

BOARD OF DIRECTORS

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Yours in Service,

A handwritten signature in black ink, appearing to read 'M. Ronchetti', with a horizontal line extending to the right.

MONICA S. RONCHETTI, Fire Marshal
San Bernardino County Fire Protection District
Office of the Fire Marshal
mronchetti@sbcfire.org

Sent: 12/4/2025 8:38:27 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
Subject: Soda Mountain- BESS location

Hi Hannah,

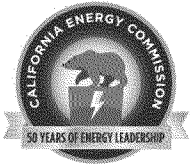
I know that the fire department were okay with the current location of the BESS. We are thinking about public health impacts and emissions from a situation where there may be a BESS fire or thermal runaway.

Is it possible to move the BESS

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 12/10/2025 11:14:23 PM
To: Selassie, Amanuel [Amanuel.Selassie@ladwp.com]
CC: Enriquez, Rodolfo [Rodolfo.Enriquez@ladwp.com]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Edirisuriya, Sudath@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a5d6cd74e9024972b122d8344f69b3a8-Edirisuriya]; Khoshmashrab, Shahab@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=debfeb665b7a45629f72eae824bce58-Khoshmashra]; Hughes, Joseph@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7dd5e80572b644209e9607ba7bdc630-Hughes, Jos]; Ha, Tin [Tin.Ha@ladwp.com]; Lakshman, Sunaja [Sunaja.Lakshman@ladwp.com]; Nassiri, Ashkan [Ashkan.Nassiri@ladwp.com]; Rucic, Nermina [Nermina.Rucic@ladwp.com]
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

Hi Amanuel,

Regarding question 2, we were wondering what environmental protection measures LADWP

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Friday, December 5, 2025 4:48 PM
To: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Cc: Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

Thanks so much Amanuel. I will let you know if a meeting would be helpful. I will make sure that I add your statement about the caveats on your responses in any Record of Conversation.

Have a great weekend.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Sent: Friday, December 5, 2025 4:42 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: RE: [EXTERNAL] Re: Soda Mountain Solar Project

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Good afternoon Lisa,

Please see our response below in purple.

Thank you

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, December 3, 2025 8:56 AM
To: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Cc: Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

SMSP02658

Thanks Amanuel,

We need to know how many operation workers would be required for operation and maintenance of the the new LADWP switchyard?

Also, how often would operations workers would be at the switchyard? This information will help estimate the number of traffic trips that would be generated during operations.

Do you anticipate any truck trips during operations?

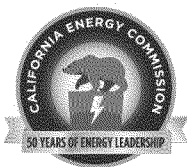
The Soda Mountain Solar Project has not been designed and built yet; therefore, it is premature to speculate the number of Operation and Maintenance (O&M) personnel required to support the station. We are happy to reach out to our O&M staff to investigate these questions further.

Thanks kindly,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>

Sent: Wednesday, December 3, 2025 7:06 AM

To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Cc: Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>

Subject: RE: [EXTERNAL] Re: Soda Mountain Solar Project

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Good morning Lisa,

We will do our best to respond to your additional questions by this Friday.

SMSP02659

Thank you

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Tuesday, December 2, 2025 11:51 AM
To: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Cc: Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

Hi Ammanuel,

Following up on my email back to you.

Can you get back to me on my follow up questions below. I need to get this information by Friday Dec 5th.

Thanks kindly,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Monday, November 24, 2025 3:23 PM
To: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Cc: Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

Hello Amanuel,

Thank you for that information. We have a few requests that will help us conduct our analysis.

1. Please send us the applicable standards and specifications that the utility switchyard to be constructed by the applicant and operated by LADWP would need to comply with. We will need to note these in our Environmental Impact Report (part of the Staff Assessment).

The Interconnection Customer (IC) shall engineer, procure equipment, and construct Joint Participation Project's Interconnection Facilities and Standalone Network Upgrades (or portions thereof) using Federal Energy Regulatory Commission's Good Utility Practice and using standards and specifications provided in advance by LADWP. As previously stated, these standards and specifications related to station design, metering, and overhead transmission towers have been shared with Soda Mountain Solar Project developer. These documents are considered confidential, and cannot be shared with anyone without a Non-Disclosure Agreement (NDA). LADWP would oppose sharing any confidential information publicly.

LADWP is available for a call to discuss this matter. In addition, we can connect you with our Environmental Group to better address this specific question for inclusion in this project's EIR.

2. Are there any standard mitigation measures the LADWP would apply to the downstream network upgrades to the protection settings at the Marketplace and Adelanto substations for construction and operation of the new utility switchyard? If so, please provide these measures and indicate which ones would apply to the downstream upgrade work and which ones would apply to operation of the new utility switchyard.

The IC is required to comply with LADWP protection standard to design, procure, and install the primary and two redundant 500 kV line protection systems for all the 500kV lines connecting to the new Soda Mountain Switching Station.

Additionally, IC shall design, procure, and install primary and redundant 500 kV Bus protection in the new Soda Mountain Switching Station, and provide the required relay protection panels to LADWP for testing and verification prior to installation by IC. IC shall design, procure, and install breaker failure protection system for the new Soda Mountain Switching Station. IC shall perform final checkout and testing/commissioning of the protection, and control systems at the new switching station and the SMSP Project's collector substation.

LADWP will design, procure, and install primary and two redundant 500 kV line protection system (including transfer trip) and breaker failure protection system located inside Marketplace and Adelanto Switching Stations. LADWP will perform final checkout and testing/commissioning of the protection, and control systems in the new switching station.

Finally, the 500 kV transmission line relay protection requires two redundant communication paths. The redundant paths between Marketplace/Adelanto and new switching station shall be Power Line Carrier and microwave communications.

All 500 kV transmission lines protection coordination needs to be reevaluated at Marketplace and Adelanto in accordance with PRC-027. New relay setting needs to be developed at Marketplace and Adelanto Switching Stations for Marketplace and Adelanto lines terminating into the Soda Switching Station.

3. How long would it take for MAP to evaluate and determine if a project downsizing would be considered a material modification that requires a new interconnection request?

There is no standard time in which MAP is required to determine if a project downsizing would be a Material Modification, and the time required would depend on a number of circumstances, including the specific proposed change and other workload at the time of the request. Soda Mountain has executed an LGIA with MAP, and that LGIA provides a definition for “Material Modification,” though the LGIA does not set forth a process for assessing whether a proposed modification is a Material Modification. To the extent that the MAP LGIP is applicable, and there is uncertainty as to whether it is applicable given the existence of a fully executed LGIA for Soda Mountain, the following considerations apply:

The MAP LGIP addresses procedures for Interconnection Customer requests for requested modifications, including the determination for whether such modifications would be considered a Material Modification (LGIP Sections 4.4.3-4.4.4). MAP LGIP Section 4.4.4 provides that the Operating Agent “shall commence and perform any necessary additional studies as soon as practicable, ... making good faith efforts to commence such studies no later than thirty (30) Calendar Days after receiving notice” of an Interconnection Customer’s request for modification. After that point, the LGIP provides no timeline for completing a study as to whether a material modification exists.

MAP is unaware of an industry-wide standard for completing downsizing studies. MAP understands that the California Independent System Operator Corporation (“CAISO”) in its Business Practice Manual (“BPM”) for Generator Management provides with respect to assessments as to whether modifications are material, Section 6.4.1, that the CAISO “shall use reasonable efforts to commence and complete modification assessments within sixty (60) calendar days.” Even then, the CAISO BPM for Generator Management allows for longer time periods to complete assessments upon providing an estimate and explanation, and the time period to conduct assessments does not begin until all information necessary to perform the assessments is provided to the CAISO. See Section 6.4.4. However, MAP has not adopted the CAISO’s BPM, and the timelines and language in CAISO’s BPM are not mandated for all Transmission Providers.

4. If a project downsizing requires a new interconnection request, how long that that process take, including approval of such request?

If a project downsizing constitutes a Material Modification and triggers a new interconnection request, MAP will require the Interconnection Customer to apply for interconnection using the same process and timelines for other interconnection requests. MAP does not offer a fast-track review of new interconnection requests as a result of a previously terminated request due to downsizing constituting a Material Modification, and MAP is unaware of other transmission providers offering this option.

MAP offers no guarantee to downsized projects that constitute a Material Modification that they will be processed in advance of other projects in the existing interconnection queue. In fact, projects subject to Material Modification should assume that their renewed interconnection request will be processed at the end of the interconnection queue.

Indicative timelines in MAP’s LGIP include: 1) acknowledgment of an interconnection request by MAP (10 Business Days, per Section 3.2.2); 2) completion of a Feasibility Study (45 Calendar Days, per Section 6.3); 3) completion of System Impact Study (90 Calendar Days, per Section 7.4); and 4)

completion of a Facilities Study (90 Calendar Days, per Section 8.3). These dates can be variable depending on, inter alia, the circumstances and complexity of the Interconnection Request, and these dates do not include intermediate and subsequent steps, such as negotiation of study agreements and the LGIA itself.

I also would like to post your responses to our first set of questions and the responses to this set of questions in the project's docket (electronic repository). This would be publicly available. This would be very helpful to support our analysis. Please confirm you are okay with our posting these to the project's docket.

MAP provides these responses in order to assist the CEC as part of its review of the Soda Mountain Solar Project. To the extent the responses below describe applications of MAP's Large Generating Interconnection Process ("LGIP") and related processes, those applications are based on MAP's knowledge of the facts and circumstances as they exist presently, and MAP reserves the right to change how it applies its processes based on further information that it receives. Further, MAP reserves the right to change its processes in the future.

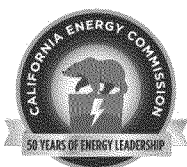
We are on a very tight schedule so appreciate your responses as soon as possible.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Sent: Monday, November 17, 2025 1:55 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: RE: [EXTERNAL] Re: Soda Mountain Solar Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Lisa,

The Marketplace-Adelanto 500kV transmission line is a joint owned facility among many participants, and that is why it took us a while to put together a response back to you. Please see below in purple a detailed response to your questions. I will go ahead cancel tomorrow's meeting, and please reach out if you have additional questions.

CEC's Questions:

1. We are wondering whether compliance with design standards for the switchyard and sections of transmission loop in line would be verified by the Los Angeles Board of Water and Power at the time the switchyard is turned over to LADWP or would it be under the CEC's jurisdiction during construction. Please let us know what the process is for such facilities.
2. We are used to CPUC standards like General Order 131E, regulating the planning and construction of electric generation, transmission, power, distribution line facilities, and substations located in California. Is LADWP required to follow the CPUC standards or does LADWP have their own standards they must comply with? If the latter is the case, please provide us the applicable standards that the switchyard and sections of transmission loop in lines be constructed to, in addition to whether compliance with these regulations is determined by the Los Angeles Board of Water and Power, or would it be under the jurisdiction of the CEC.
3. Would the switching station serve only Soda Mountain Solar, or would it serve other costumers as well (this will help answer the jurisdictional question)
4. If the switching station is jurisdictional to LADWP, what would the coordination look like between our DCBO and LADWP inspector? You asked about this when asking who is responsible for ensuring compliance with building codes during construction, but if the responsibility lies with LADWP, is there some level of coordination with our DCBO for the portions where the project interconnects? Some level of overlap or handoff to LADWP?
5. If they deliver substantially less MW than their agreement, it will trigger a "material modification process". We are wondering how many MW short of 300 would trigger such a modification.

Our response:

(#1 & #2) The developer of Soda Mountain Solar Project has proposed interconnecting to the Marketplace-Adelanto 500kV Transmission Line, which is part of the Mead-Adelanto Project (MAP). MAP is jointly owned by multiple participants, with LADWP serving as the Operating Agent (OA).

Upon completion of the switchyard and the two looped-in transmission line segments, ownership of these assets will be transferred to MAP Participants, LADWP has executed an Engineering & Procurement Agreement with the developer to facilitate progress on the interconnection, including the construction of the switchyard and the looped-in transmission lines.

To support the construction phase, LADWP has provided the developer with applicable standards and specification. LADWP will oversee and verify the developer's work throughout all phases, engineering, procurement, construction, and commissioning, prior to final turnover to MAP participants. Compliance with these requirements will fall under MAP jurisdictions.

(#3) The proposed switching station is intended for the Soda Mountain Solar Project but once MAP acquires the switching station, it will be opened to future interconnection customers.

(#4) We recommend that the CEC's recommended EIR include language that: a) describes the respective areas that are subject to CEC/DCBO inspection authority and those that are subject to LADWP inspection authority; and b) requires coordination between the CEC's DCBO and the LADWP inspector regarding where the infrastructure in those areas interconnect. For example, where there are technical ratings that need to be aligned with one another, e.g., the same specifications have to be in place on either side in order for the infrastructure to work safely and reliably, the DCBO and LADWP's inspector should inquire whether those specifications are aligned and compare notes. The point in time when that comparison would occur likely would be near the end of construction.

(#5) The Soda Mountain Solar Project has an existing and executed LGIA with SCPPA and Startrans IO, LLC. Material Modifications are defined in that LGIA as "modifications that have a material impact on the cost or timing of any Interconnection Request with a later queue priority date." Typically, analysis of the impacts of Material Modifications are conducted during the Large Generator Interconnection Process before an LGIA is reached between MAP and the Interconnection Customer, not after execution of the LGIA.

The executed Soda Mountain LGIA provisions on Modifications indicate that permitted modifications cannot necessitate a new Interconnection Request. The definition of "Interconnection Request" in the Soda Mountain LGIA includes a request: "to interconnect a new Generating Facility, or to increase the capacity of, or make a Material Modification to the operating characteristics of, an existing Generating Facility that is interconnected with the JPP."

We are unaware of any industry standard that deems downsizing a facility to be a Material Modification but are aware that some entities, such as CAISO, offer limited downsizing opportunities. MAP does not have standard criteria to determine at what point a project downsizing would be deemed a Material Modification, such that a new Interconnection Request would be required.

Thank you!

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Sent: Thursday, November 13, 2025 10:10 AM

To: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>

Cc: Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Ha, Tin <Tin.Ha@ladwp.com>

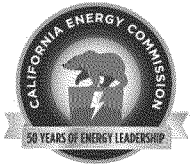
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

Are you available for a meeting on Tuesday 11/18 from 4-5?

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>
Sent: Thursday, November 13, 2025 9:08 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>
Subject: RE: [EXTERNAL] Re: Soda Mountain Solar Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Lisa,

We are working on providing you the response requested. We believe it will also be beneficial to discuss the responses through a meeting. Are you available next Tuesday or Wednesday for a call to discuss the responses to your questions?

Thanks.

Sunaja Lakshman
Manager of Transmission Asset Management
Power System Planning Division
Los Angeles Department of Water & Power
Ph. (213) 367-3281 ; Cell: (213) 554-4654
Email: Sunaja.Lakshman@ladwp.com

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, November 12, 2025 10:27 AM
To: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Ha, Tin <Tin.Ha@ladwp.com>

Cc: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

Hi all,

I am circling back on my requests. We are running out of time and need to better understand the LADWP process and what facility design regulations apply. Do you use the CPUC general orders or do you have your own regulations.

Our staff are trying to wrap up their analysis so timing is tight.

Thanks,

Lisa Worrall

Senior Environmental Planner

CEQA Project Management Unit

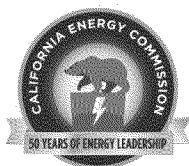
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814

1-916-661-8367

California Energy Commission

Website: www.energy.ca.gov



From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Sent: Friday, October 31, 2025 9:25 AM

To: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Ha, Tin <Tin.Ha@ladwp.com>

Cc: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>;

SMSP02667

Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>

Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

Wonderful. Thank you very much Amanuel.

Lisa Worrall

Senior Environmental Planner

CEQA Project Management Unit

Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814

1-916-661-8367

California Energy Commission

Website: www.energy.ca.gov



From: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>

Sent: Friday, October 31, 2025 9:23 AM

To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>

Cc: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>

Subject: RE: [EXTERNAL] Re: Soda Mountain Solar Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Lisa,

We received your email. I am working on it. I will reach out to you to set up a meeting to discuss on this.

Thank you

SMSP02668

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Friday, October 31, 2025 9:19 AM
To: Ha, Tin <Tin.Ha@ladwp.com>
Cc: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Subject: [EXTERNAL] Re: Soda Mountain Solar Project

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Hello Tin,

I am following up on my emails to you last week. We would very much like to better understand the LADWP process associated with this proposed project in San Bernardino County along the Mead-Adelanto Transmission Line.

We also have questions about the applicant's interconnection agreement to provide 300 MW of solar generation to that transmission line. It may be most efficient to meet. The applicant has informed that, in essence, if they deliver substantially less MW than their agreement, it will trigger a "material modification process". We are wondering how many MW short of 300 would trigger such a modification.

Please contact me so we can talk. Thanks kindly,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, October 23, 2025 9:04 AM
To: Tin.Ha@ladwp.com <Tin.Ha@ladwp.com>

Cc: Sunaja.Lakshman@ladwp.com <Sunaja.Lakshman@ladwp.com>;
Amanuel.Selassie@ladwp.com <Amanuel.Selassie@ladwp.com>;
Ashkan.Nassiri@ladwp.com <Ashkan.Nassiri@ladwp.com>; Nermina.Rucic@ladwp.com <Nermina.Rucic@ladwp.com>;
Rodolfo.Enriquez@ladwp.com <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy
<kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy
<sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>;
Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Subject: Re: Soda Mountain Solar Project

Hi Tin,

We have a few more specific questions:

1. Would the switching station serve only Soda Mountain Solar, or would it serve other costumers as well (this will help answer the jurisdictional question)
2. If the switching station is jurisdictional to LADWP, what would the coordination look like between our DCBO and LADWP inspector? You asked about this when asking who is responsible for ensuring compliance with building codes during construction, but if the responsibility lies with LADWP, is there some level of coordination with our DCBO for the portions where the project interconnects? Some level of overlap or handoff to LADWP?

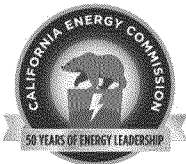
It may be helpful to meet on this project. We are undergoing our CEQA environmental analysis and have questions about the switchyard. We don't have a lot of time to clarify our questions as we need to publish our environmental document soon.

Thanks so much,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, October 22, 2025 8:45 AM
To: Tin.Ha@ladwp.com <Tin.Ha@ladwp.com>
Cc: Sunaja.Lakshman@ladwp.com <Sunaja.Lakshman@ladwp.com>;
Amanuel.Selassie@ladwp.com <Amanuel.Selassie@ladwp.com>;
Ashkan.Nassiri@ladwp.com <Ashkan.Nassiri@ladwp.com>; Nermina.Rucic@ladwp.com <Nermina.Rucic@ladwp.com>;
Rodolfo.Enriquez@ladwp.com <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy

<kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>

Subject: Re: Soda Mountain Solar Project

Hello Tin,

I just had one more request. We are used to CPUC standards like General Order 131E, regulating the planning and construction of electric generation, transmission, power, distribution line facilities, and substations located in California.

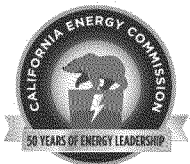
Is LADWP required to follow the CPUC standards or does LADWP have their own standards they must comply with? If the latter is the case, please provide us the applicable standards that the switchyard and sections of transmission loop in lines be constructed to, in addition to whether compliance with these regulations is determined by the Los Angeles Board of Water and Power, or would it be under the jurisdiction of the CEC.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy
Sent: Wednesday, October 22, 2025 8:31 AM
To: Tin.Ha@ladwp.com <Tin.Ha@ladwp.com>
Cc: Sunaja.Lakshman@ladwp.com <Sunaja.Lakshman@ladwp.com>;
Amanuel.Selassie@ladwp.com <Amanuel.Selassie@ladwp.com>;
Ashkan.Nassiri@ladwp.com <Ashkan.Nassiri@ladwp.com>; Nermina.Rucic@ladwp.com <Nermina.Rucic@ladwp.com>;
Rodolfo.Enriquez@ladwp.com <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy
<kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy
<sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>
Subject: Soda Mountain Solar Project

Hello Tin,

My name is Lisa Worrall and I am the Project Manager at the California Energy Commission. Joan Patrovski with BLM had sent me some emails from you all regarding the Soda Mountain Solar Project. We have some questions that I hope you or someone else with LADWP can answer.

The California Energy Commission is preparing an environmental analysis in compliance with the California Environmental Quality Act. The applicant has filed an application opting into our jurisdiction. I have previously sent notification of this project to Faranak Sarbaz.

The construction of the switchyard by the applicant would be under the California Energy Commission's (CEC) jurisdiction. Following construction, it is our understanding the LADWP would own and operate the switchyard and LADWP would install and operate the section of two transmission lines that would be looped in and out of the switchyard.

Projects under the CEC jurisdiction or have opted into our jurisdiction also undergo evaluation for conformance with laws, ordinances, regulations, and standards (LORS). We understand that the Los Angeles Board of Water and Power has jurisdiction over LADWP.

We are wondering whether compliance with design standards for the switchyard and sections of transmission loop in line would be verified by the Los Angeles Board of Water and Power at the time the switchyard is turned over to LADWP or would it be under the CEC's jurisdiction during construction. Please let us know what the process is for such facilities.

If you have any question, please let me know. We are currently preparing our Draft Environmental Impact Report, which will be inside a Staff Assessment and need to confirm these details.

Thanks so much,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



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From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 12/2/2025 7:46:21 PM
To: Selassie, Amanuel [Amanuel.Selassie@ladwp.com]
CC: Enriquez, Rodolfo [Rodolfo.Enriquez@ladwp.com]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Edirisuriya, Sudath@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a5d6cd74e9024972b122d8344f69b3a8-Edirisuriya]; Khoshmashrab, Shahab@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=debfeb665b7a45629f72eae824bce58-Khoshmashra]; Hughes, Joseph@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7dd5e80572b644209e9607ba7bdc630-Hughes, Jos]; Ha, Tin [Tin.Ha@ladwp.com]; Lakshman, Sunaja [Sunaja.Lakshman@ladwp.com]; Nassiri, Ashkan [Ashkan.Nassiri@ladwp.com]; Rucic, Nermina [Nermina.Rucic@ladwp.com]
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

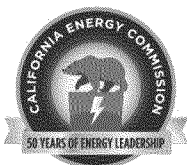
Hi Ammanuel,

Following up on my email back to you.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Sent: Monday, November 17, 2025 1:55 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: RE: [EXTERNAL] Re: Soda Mountain Solar Project

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Good afternoon Lisa,

The Marketplace-Adelanto 500kV transmission line is a joint owned facility among many participants, and that is why it took us a while to put together a response back to you. Please see below in purple a detailed response to your questions. I will go ahead cancel tomorrow's meeting, and please reach out if you have additional questions.

CEC's Questions:

1. We are wondering whether compliance with design standards for the switchyard and sections of transmission loop in line would be verified by the Los Angeles Board of Water and Power at the time the switchyard is turned over to LADWP or would it be under the CEC's jurisdiction during construction. Please let us know what the process is for such facilities.
2. We are used to CPUC standards like General Order 131E, regulating the planning and construction of electric generation, transmission, power, distribution line facilities, and substations located in California. Is LADWP required to follow the CPUC standards or does LADWP have their own standards they must comply with? If the latter is the case, please provide us the applicable standards that the switchyard and sections of transmission loop in lines be constructed to, in addition to whether compliance with these regulations is determined by the Los Angeles Board of Water and Power, or would it be under the jurisdiction of the CEC.
3. Would the switching station serve only Soda Mountain Solar, or would it serve other costumers as well (this will help answer the jurisdictional question)
4. If the switching station is jurisdictional to LADWP, what would the coordination look like between our DCBO and LADWP inspector? You asked about this when asking who is responsible for ensuring compliance with building codes during construction, but if the responsibility lies with LADWP, is there some level of coordination with our DCBO for the portions where the project interconnects? Some level of overlap or handoff to LADWP?
5. If they deliver substantially less MW than their agreement, it will trigger a "material modification process". We are wondering how many MW short of 300 would trigger such a modification.

Our response:

(#1 & #2) The developer of Soda Mountain Solar Project has proposed interconnecting to the Marketplace-Adelanto 500kV Transmission Line, which is part of the Mead-Adelanto Project (MAP). MAP is jointly owned by multiple participants, with LADWP serving as the Operating Agent (OA).

Upon completion of the switchyard and the two looped-in transmission line segments, ownership of these assets will be transferred to MAP Participants, LADWP has executed an Engineering & Procurement Agreement with the developer to facilitate progress on the interconnection, including the construction of the switchyard and the looped-in transmission lines.

To support the construction phase, LADWP has provided the developer with applicable standards and specification. LADWP will oversee and verify the developer's work throughout all phases, engineering, procurement, construction, and commissioning, prior to final turnover to MAP participants. Compliance with these requirements will fall under MAP jurisdictions.

(#3) The proposed switching station is intended for the Soda Mountain Solar Project but once MAP acquires the switching station, it will be opened to future interconnection customers.

(#4) We recommend that the CEC's recommended EIR include language that: a) describes the respective areas that are subject to CEC/DCBO inspection authority and those that are subject to LADWP inspection authority; and b) requires coordination between the CEC's DCBO and the LADWP inspector regarding where the infrastructure in those areas interconnect. For example, where there are technical ratings that need to be aligned with one another, e.g., the same specifications have to be in place on either side in order for the infrastructure to work safely and reliably, the DCBO and LADWP's inspector should inquire whether those specifications are aligned and compare notes. The point in time when that comparison would occur likely would be near the end of construction.

(#5) The Soda Mountain Solar Project has an existing and executed LGIA with SCPPA and Startrans IO, LLC. Material Modifications are defined in that LGIA as "modifications that have a material impact on the cost or timing of any Interconnection Request with a later queue priority date." Typically, analysis of the impacts of Material Modifications are conducted during the Large Generator Interconnection Process before an LGIA is reached between MAP and the Interconnection Customer, not after execution of the LGIA.

The executed Soda Mountain LGIA provisions on Modifications indicate that permitted modifications cannot necessitate a new Interconnection Request. The definition of "Interconnection Request" in the Soda Mountain LGIA includes a request: "to interconnect a new Generating Facility, or to increase the capacity of, or make a Material Modification to the operating characteristics of, an existing Generating Facility that is interconnected with the JPP."

We are unaware of any industry standard that deems downsizing a facility to be a Material Modification but are aware that some entities, such as CAISO, offer limited downsizing opportunities. MAP does not have standard criteria to determine at what point a project downsizing would be deemed a Material Modification, such that a new Interconnection Request would be required.

Thank you!

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Sent: Thursday, November 13, 2025 10:10 AM

To: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>

Cc: Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Ha, Tin <Tin.Ha@ladwp.com>

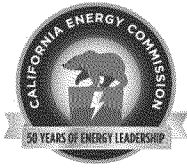
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

Are you available for a meeting on Tuesday 11/18 from 4-5?

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
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Sent: Thursday, November 13, 2025 9:08 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>; Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>
Subject: RE: [EXTERNAL] Re: Soda Mountain Solar Project

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Hello Lisa,

We are working on providing you the response requested. We believe it will also be beneficial to discuss the responses through a meeting. Are you available next Tuesday or Wednesday for a call to discuss the responses to your questions?

Thanks.

Sunaja Lakshman
Manager of Transmission Asset Management
Power System Planning Division
Los Angeles Department of Water & Power
Ph. (213) 367-3281 ; Cell: (213) 554-4654
Email: Sunaja.Lakshman@ladwp.com

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, November 12, 2025 10:27 AM
To: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Ha, Tin <Tin.Ha@ladwp.com>

Cc: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

Hi all,

I am circling back on my requests. We are running out of time and need to better understand the LADWP process and what facility design regulations apply. Do you use the CPUC general orders or do you have your own regulations.

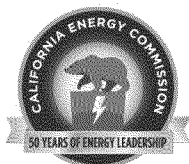
Our staff are trying to wrap up their analysis so timing is tight.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Friday, October 31, 2025 9:25 AM
To: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Ha, Tin <Tin.Ha@ladwp.com>
Cc: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Subject: Re: [EXTERNAL] Re: Soda Mountain Solar Project

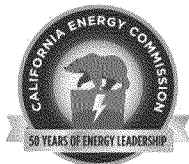
Wonderful. Thank you very much Amanuel.

Lisa Worrall
Senior Environmental Planner

CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Sent: Friday, October 31, 2025 9:23 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>
Cc: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Subject: RE: [EXTERNAL] Re: Soda Mountain Solar Project

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Good morning Lisa,

We received your email. I am working on it. I will reach out to you to set up a meeting to discuss on this.

Thank you

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Friday, October 31, 2025 9:19 AM
To: Ha, Tin <Tin.Ha@ladwp.com>
Cc: Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Subject: [EXTERNAL] Re: Soda Mountain Solar Project

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Hello Tin,

I am following up on my emails to you last week. We would very much like to better understand the LADWP process associated with this proposed project in San Bernardino County along the Mead-Adelanto Transmission Line.

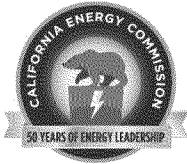
We also have questions about the applicant's interconnection agreement to provide 300 MW of solar generation to that transmission line. It may be most efficient to meet. The applicant has informed that, in essence, if they deliver substantially less MW than their agreement, it will trigger a "material modification process". We are wondering how many MW short of 300 would trigger such a modification.

Please contact me so we can talk. Thanks kindly,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, October 23, 2025 9:04 AM
To: Tin.Ha@ladwp.com <Tin.Ha@ladwp.com>
Cc: Sunaja.Lakshman@ladwp.com <Sunaja.Lakshman@ladwp.com>; Amanuel.Selassie@ladwp.com <Amanuel.Selassie@ladwp.com>; Ashkan.Nassiri@ladwp.com <Ashkan.Nassiri@ladwp.com>; Nermina.Rucic@ladwp.com <Nermina.Rucic@ladwp.com>; Rodolfo.Enriquez@ladwp.com <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>; Hughes, Joseph@Energy <Joseph.Hughes@energy.ca.gov>
Subject: Re: Soda Mountain Solar Project

Hi Tin,

We have a few more specific questions:

1. Would the switching station serve only Soda Mountain Solar, or would it serve other costumers as well (this will help answer the jurisdictional question)
2. If the switching station is jurisdictional to LADWP, what would the coordination look like between our DCBO and LADWP inspector? You asked about this when asking who is responsible for ensuring

compliance with building codes during construction, but if the responsibility lies with LADWP, is there some level of coordination with our DCBO for the portions where the project interconnects? Some level of overlap or handoff to LADWP?

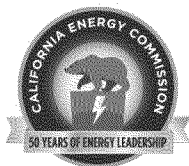
It may be helpful to meet on this project. We are undergoing our CEQA environmental analysis and have questions about the switchyard. We don't have a lot of time to clarify our questions as we need to publish our environmental document soon.

Thanks so much,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, October 22, 2025 8:45 AM
To: Tin.Ha@ladwp.com <Tin.Ha@ladwp.com>
Cc: Sunaja.Lakshman@ladwp.com <Sunaja.Lakshman@ladwp.com>; Amanuel.Selassie@ladwp.com <Amanuel.Selassie@ladwp.com>; Ashkan.Nassiri@ladwp.com <Ashkan.Nassiri@ladwp.com>; Nermina.Rucic@ladwp.com <Nermina.Rucic@ladwp.com>; Rodolfo.Enriquez@ladwp.com <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>
Subject: Re: Soda Mountain Solar Project

Hello Tin,

I just had one more request. We are used to CPUC standards like General Order 131E, regulating the planning and construction of electric generation, transmission, power, distribution line facilities, and substations located in California.

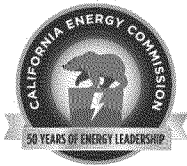
Is LADWP required to follow the CPUC standards or does LADWP have their own standards they must comply with? If the latter is the case, please provide us the applicable standards that the switchyard and sections of transmission loop in lines be constructed to, in addition to whether compliance with these regulations is determined by the Los Angeles Board of Water and Power, or would it be under the jurisdiction of the CEC.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy
Sent: Wednesday, October 22, 2025 8:31 AM
To: Tin.Ha@ladwp.com <Tin.Ha@ladwp.com>
Cc: Sunaja.Lakshman@ladwp.com <Sunaja.Lakshman@ladwp.com>; Amanuel.Selassie@ladwp.com <Amanuel.Selassie@ladwp.com>; Ashkan.Nassiri@ladwp.com <Ashkan.Nassiri@ladwp.com>; Nermina.Rucic@ladwp.com <Nermina.Rucic@ladwp.com>; Rodolfo.Enriquez@ladwp.com <Rodolfo.Enriquez@ladwp.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Edirisuriya, Sudath@Energy <sudath.edirisuriya@energy.ca.gov>; Khoshmashrab, Shahab@Energy <Shahab.Khoshmashrab@energy.ca.gov>
Subject: Soda Mountain Solar Project

Hello Tin,

My name is Lisa Worrall and I am the Project Manager at the California Energy Commission. Joan Patrovski with BLM had sent me some emails from you all regarding the Soda Mountain Solar Project. We have some questions that I hope you or someone else with LADWP can answer.

The California Energy Commission is preparing an environmental analysis in compliance with the California Environmental Quality Act. The applicant has filed an application opting into our jurisdiction. I have previously sent notification of this project to Faranak Sarbaz.

The construction of the switchyard by the applicant would be under the California Energy Commission's (CEC) jurisdiction. Following construction, it is our understanding the LADWP would own and operate the switchyard and LADWP would install and operate the section of two transmission lines that would be looped in and out of the switchyard.

Projects under the CEC jurisdiction or have opted into our jurisdiction also undergo evaluation for conformance with laws, ordinances, regulations, and standards (LORS). We understand that the Los Angeles Board of Water and Power has jurisdiction over LADWP.

We are wondering whether compliance with design standards for the switchyard and sections of transmission loop in line would be verified by the Los Angeles Board of Water and Power at the time the switchyard is turned over to LADWP or would it be under the CEC's jurisdiction during construction. Please let us know what the process is for such facilities.

If you have any question, please let me know. We are currently preparing our Draft Environmental Impact Report, which will be inside a Staff Assessment and need to confirm these details.

Thanks so much,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



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From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 12/12/2025 4:53:35 AM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
Subject: Re: Stormwater Info

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From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Thursday, December 11, 2025 5:21:56 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Stormwater Info

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Hi Lisa,

Below are the responses to your December 2 email.

However ---- as we discussed on Monday ---- our preferred approach to addressing the site hydrology issue is to require the project implement mitigation measure MM HYD-1. Implementation of this mitigation measure would require the project implement a fluvial geomorphic stormwater design.

Attached is a memo identifying the required mitigation measure MM HYD-1 and providing supporting documentation that shows this approach will reduce project impacts to a level below significant.

We are happy to further discuss, if needed.

Best,
Hannah

Hannah Arkin

CEO

Resolution Environmental

262 B Avenue, Coronado, CA 92118

760-504-4109

From: Lori Coleman <lori.coleman@swca.com>
Sent: Thursday, December 11, 2025 1:21 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Blake Holcomb <Blake.Holcomb@swca.com>; Steve Marks <Steve.Marks@swca.com>; Matthew DeFreese

SMSP02684

<Matthew.DeFreese@swca.com>; Shirley Innecken <Shirley.Innecken@swca.com>

Subject: RE: Waters data

Hi Hannah, here are our answers to the hydrology-related questions (green):

- Acres of permanent impacts that result in the loss of ecological value to plants and wildlife and remove the stream channel from the system. These features include all permanent structures (BESS, utility switchyard and project substation, berms, and ancillary buildings, well footprints), gen-tie and array foundations, fencing, any areas maintained free from vegetation, and roads. There are 313 acres that meet these criteria.
- Acres for any areas under the arrays that receive altered hydrology from the placement of perimeter berms or other structures that cut off stream hydrology. This would include the East array, portions of South Array 2 in areas downstream of the berms, and the South Array 3. There are XXX (see below) acres that meet these criteria.
 - *The construction phase conditions accounts for the proposed temporary BMPs and permanent BMPs, including diversion berms, ditches and sediment basins. Except for a small area in the northern portion of the East Array, the PV panel areas will be hydrologically altered during the construction phase. Estimated hydrologically altered PV area across the East Array, South Array 1, South Array 2 and South Array 3 during the construction phase is approximately 1,426 acres, with 12 acres hydrologically unaltered.*
 - *The post-construction phase conditions accounts for removal of the proposed temporary BMPs, leaving the permanent diversion berms and sediment basins (we assumed the sediment basins will remain). Estimated hydrologically altered PV area across the East Array, South Array 1, South Array 2 and South Array 3 during the post-construction phase is approximately 894 acres, with 544 acres hydrologically unaltered.*
- *Figures are provided here:* [PDF 68347 Soda Mountain Hydrology Exhibits 2025-12-10.pdf](#)
- Acreage for manufactured basins with vegetated banks subject to periodic maintenance. There are 23.6 acres that meet these criteria.
- Acres for any areas under the arrays that maintain unaltered hydrology. This includes South Array 1 which receives flows from the side of the project that does not contain berms. There are XXX acres that meet these criteria. (see above)
- Acres of temporary impacts along the gen-tie alignment that can be re-established following construction. There are 31.4 acres that meet these criteria.
- Acreages of temporary impacts to drainages that cross existing access roads provided they do not alter hydrology or add rock.
 - Existing trail roads (Razor Road and Arrowhead Trail) and the existing drainages will be permanently impacted by proposed channel systems and a new alignment for Razor Road.

One additional question, is there possibility of removing specific sections of berm to allow flows through the project site?

SWCA response: *That seems potentially reasonable. We would need to evaluate the volume of flow and potential risk of scour with the change. The 30% Kleinfelder erosion control plan design specifies many of the berms and ditches as temporary. As long as the flows (pre/post) and scour potential are not an issue, the temporary BMPs could be removed once construction is completed and disturbed areas have been stabilized.*

1. Can you point us to the ordinance or other San Bernardino County regulation that resulted in the need for the berms around the project. It would be helpful to get your understanding of why the berms are necessary.

SWCA response: *This is not a San Bernardino County regulation. The idea behind the berms is to reduce the risk of scour across the site. Because the upstream watershed is largely alluvial fan, there is not a specific flood concentration point. The berms help direct and concentrate flow to the flood control channels.*

2. If not for the San Bernardino County regulations, would the applicant have proposed the berms?

SWCA response: *Yes, see above*

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Sent: Tuesday, December 2, 2025 11:08:06 AM

To: Hannah Arkin <hannah@resolutionenvironmental.com>

Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Chris Huntley <chuntley@aspenerg.com>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Jamison Miner <jminer@aspenerg.com>; Ackerman, James@Energy <james.ackerman@energy.ca.gov>

Subject: Fw: Waters data

Please provide this information as soon as possible, but by Thursday Dec 11th.

Thank you kindly,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Chris Huntley <Chuntley@aspenerg.com>

Sent: Tuesday, December 2, 2025 10:42 AM

To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Jamison Miner <jminer@aspenerg.com>; Ackerman, James@Energy <james.ackerman@energy.ca.gov>

Subject: Waters data

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Lisa,

Here are the metrics we would like the applicant to provide our team.

Jurisdictional Features

- Acres of permanent impacts that result in the loss of ecological value to plants and wildlife and remove the stream channel from the system. These features include all permanent structures (BESS, utility switchyard and project substation, berms, and ancillary buildings, well footprints), gen-tie and array foundations, fencing, any areas maintained free from vegetation, and roads. There are XXX acres that meet these criteria.
- Acres for any areas under the arrays that receive altered hydrology from the placement of perimeter berms or other structures that cut off stream hydrology. This would include the East array, portions of South Array 2 in areas downstream of the berms, and the South Array 3. There are XXX acres that meet these criteria.
- Acreage for manufactured basins with vegetated banks subject to periodic maintenance. There are XXX acres that meet these criteria.
- Acres for any areas under the arrays that maintain unaltered hydrology. This includes South Array 1 which receives flows from the side of the project that does not contain berms. There are XXX acres that meet these criteria.
- Acres of temporary impacts along the gen-tie alignment that can be re-established following construction. There are XXX acres that meet these criteria.
- Acreages of temporary impacts to drainages that cross existing access roads provided they do not alter hydrology or add rock.

Best regards,

Chris



Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspenerg.com

Agoura Hills | San Francisco | Sacramento | Inland Empire | Palm Springs

SMSP02687

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From: Chang, Kaycee@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DD3D2FC8670840BDA4ACDC455903E787-CHANG, KAYC]
Sent: 1/6/2026 6:20:48 PM
To: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Hannah Arkin [hannah@resolutionenvironmental.com]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Chris Huntley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=018948a34a3149c4a3833144594ae8b3-ff2eee5c-df]; Madsen, Sierra@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=12a38a987aa54d1e8b67d8f74f0fd74-f248e363-42]; Cadwell, Tyler@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc1c5e73d5874d6d952101ca25571eef-a686c19b-a4]; Ponce, Mariah@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc5faa5d564c4cf3a2f49468b736b6c2-b2346f64-e7]; Cabrera, Crystal@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ed6e32a127144ccfa19a6f4347765a9e-00a33618-ff]; Jamison Miner [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e9a371186e0e402a994145a67d6e7684-546eb26e-f8]; Crisp, Ann@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b89c4de7ece742679d19e1e3ee713dc2-Crisp, Ann@]; Black, Devin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c6ec9f417a6e448aae52465b9f719b5d-ea9475b4-16]; Cochran, Susan@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=32a787d6508b4f1c83e7e27a70ad65e6-9e8a3044-19]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]
CC: Thea Benson [tbenson@rinconconsultants.com]; Epstein, Barry [bepstein@allenmatkins.com]; Emily Gaston [egaston@rinconconsultants.com]; May Lau [mlau@rinconconsultants.com]; David Daitch [ddaitch@rinconconsultants.com]; Marlyng Gama [mgama@rinconconsultants.com]; Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Aronson, Jacob [jaronson@allenmatkins.com]
Subject: Soda Mountain Solar Project JD Meeting Request
Location: Microsoft Teams Meeting
Start: 1/7/2026 10:00:00 PM
End: 1/7/2026 11:00:00 PM
Show Time As: Tentative
Recurrence: (none)
Required Attendees: Hannah Arkin; Worrall, Lisa@Energy; Chris Huntley; Madsen, Sierra@Energy; Cadwell, Tyler@Energy; Ponce, Mariah@Energy; Cabrera, Crystal@Energy; Jamison Miner; Crisp, Ann@Energy; Black, Devin@Energy; Cochran, Susan@Energy; Knight, Eric@Energy
Optional Attendees: Thea Benson; Epstein, Barry; Emily Gaston; May Lau; David Daitch; Marlyng Gama; Ackerman, James@Energy; Abulaban, Abdel-Karim@Energy; Aronson, Jacob

Forwarding this to you as we will probably need to get into HYD-1.

From: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Sent: Monday, January 5, 2026 8:59:46 AM (UTC-08:00) Pacific Time (US & Canada)
To: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Hannah Arkin <hannah@resolutionenvironmental.com>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Chris Huntley <chuntley@aspeneg.com>; Madsen, Sierra@Energy <Sierra.Madsen@energy.ca.gov>; Cadwell, Tyler@Energy <Tyler.Cadwell@energy.ca.gov>; Ponce, Mariah@Energy

<Mariah.Ponce@Energy.ca.gov>; Cabrera, Crystal@Energy <Crystal.Cabrera@Energy.ca.gov>; Jamison Miner <jminer@aspenerg.com>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Black, Devin@Energy <Devin.Black@Energy.ca.gov>; Cochran, Susan@Energy <Susan.Cochran@energy.ca.gov>
Cc: Thea Benson <tbenson@rinconconsultants.com>; Epstein, Barry <bepstein@allenmatkins.com>; Emily Gaston <egaston@rinconconsultants.com>; May Lau <mlau@rinconconsultants.com>; David Daitch <ddaitch@rinconconsultants.com>; Marlyng Gama <mgama@rinconconsultants.com>
Subject: Soda Mountain Solar Project JD Meeting Request
When: Wednesday, January 7, 2026 2:00 PM-3:00 PM.
Where: Microsoft Teams Meeting

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Friday, January 2, 2026 8:01:30 PM
To: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: JD Meeting Request

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Hi Kaycee,

I would like to request a meeting with the CEC legal team so that I can ensure we establish a proper methodology for the updated jurisdictional delineation. Would it be possible to set something up for Monday or Tuesday of next week? I need to send our consultant team out into the field by the 8th, so ideally the sooner the better. I will also be bringing our legal counsel, Allen Matkins, since the focus of the discussion regarding the need for updating the surveys related to legal defensibility.

I understand if everyone is out until Monday, but I wanted to go ahead and get this request over to you ASAP.

Thank you!
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

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Meeting ID: 267 096 380 927 37

Passcode: Dd6aV6qR

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Phone conference ID: 420 463 089#

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

From: Chris Huntley [Chuntley@aspeneg.com]
Sent: 1/8/2026 9:29:43 PM
To: Chris Huntley [Chuntley@aspeneg.com]; Hannah Arkin [hannah@resolutionenvironmental.com]; Crisp, Ann@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b89c4de7ece742679d19e1e3ee713dc2-Crisp, Ann@]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Wood, Brandy@Wildlife [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=91005dc76c8d4476bb3573dd5d262032-8a1c29fe-5d]; Sharma, Shankar@Wildlife [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e450028f8260453286a3618dc16e2c37-9cb4eddf-37]; Rodriguez, Magdalena@Wildlife [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0649923a609244e786680e9482857847-315f40b0-c1]; Steinert, Tiffany@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fdbc9163bf404f4d84f0a53c6ed84ab0-Waterboards]; Justin Wood [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=86ee559cfc814439b69a025b0961d2a2-536cef40-79]; Jamison Miner [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e9a371186e0e402a994145a67d6e7684-546eb26e-f8]
Subject: Soda Mountain Delineation of State and CDFW Jurisdictional Waters
Location: Microsoft Teams Meeting
Start: 1/9/2026 10:00:00 PM
End: 1/10/2026 12:30:00 AM
Show Time As: Tentative
Recurrence: (none)

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Hannah,

Please share this invitation with your delineation team. Please note we were able to get the water board and CDFW to participate.

Agenda:

- 1: Introductions
- 2: Goals and End Product
- 3: Methodologies
 - A. Use of Existing Data, Aerial Imagery, and Boots on the Ground
- 4: Open Discussion
- 5: Next Steps
- 6: Field Verification of updated report by CEC and Agencies (if available)

Team,

Tomorrow I would like to take this time to workshop methods to complete the Delineation for the Soda Mountain Project.

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Meeting ID: 284 786 973 666 55

Passcode: D3Bq2rh3

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Phone conference ID: 395 939 319#

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[Org help](#)

From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 1/16/2026 6:23:48 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; DeLano, Kevin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=de745a362d214bfbb777e8fd9d9193da-5e9a22f8-24]; Crisp, Ann@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b89c4de7ece742679d19e1e3ee713dc2-Crisp, Ann@]; Chris Huntley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=018948a34a3149c4a3833144594ae8b3-ff2eee5c-df]; Jamison Miner [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e9a371186e0e402a994145a67d6e7684-546eb26e-f8]; Hannah Arkin [hannah@resolutionenvironmental.com]
CC: Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Tory Walker [Tory@trwengineering.com]; Keenan, Grace@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=900e20ed5c9f4d578ef515167dea57fb-f37bb591-f6]
Subject: Soda Mountain Hydrology
Location: Microsoft Teams Meeting
Start: 1/23/2026 10:30:00 PM
End: 1/23/2026 11:30:00 PM
Show Time As: Busy
Recurrence: (none)
Required Attendees: Ackerman, James@Energy; Abulaban, Abdel-Karim@Energy; DeLano, Kevin@Energy; Crisp, Ann@Energy; Chris Huntley; Jamison Miner; Hannah Arkin
Optional Attendees: Knight, Eric@Energy; Chang, Kaycee@Energy; Tory Walker; Keenan, Grace@Energy

Meeting with the applicant to discuss hydrology.

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Meeting ID: 241 569 507 947 06

Passcode: fV3CC9Dc

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+1 916-562-1816,,792850083# United States, Sacramento

[Find a local number](#)

Phone conference ID: 792 850 083#

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 1/6/2026 6:18:57 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Roark, Gabriel@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ed87ff1e22cd49f3aaff644c82538d46-Roark, Gabr]; Larson, William@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7d9e60624bc84728ab89022ad74408dc-aff4008d-d8]
Subject: Re: Cancel PM meeting serries for Soda Mountain Solar Project

Hi Hannah,

We have been consulting with San Manuel under AB 52. They had requested monitoring during construction and some language that was included that we considered reasonable. These were included as part of a COC.

Regarding the Staff Assessment public meeting. This is the time when staff presents their conclusions on the project and seeks public comment. There won't be an opportunity for the applicant to present a summary of the project description, but depending upon how things unfold that day, if there is some misinformation or a question about the project description, we may ask for clarification from you or the applicant.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Tuesday, January 6, 2026 8:28 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Cancel PM meeting serries for Soda Mountain Solar Project

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SMSP02696

Hi Lisa,

Thank you and your team for all your hard work publishing the Draft EIR! I know this was a heavy lift for all involved, and we are grateful you squeezed us in during the busy holiday season! Cancelling the series is fine with me, although I do have 2 questions for you right now:

1. Has there been any tribal responses to the AB 52 notification?
2. During the Feb 5th meeting, will I be given 5-10 minutes to give an overview of the project (similar to the last meeting)?

Thank you again for all your and the CEC's hard work to get this document published.

Happy New Year!

Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Tuesday, January 6, 2026 8:20:47 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Cancel PM meeting serries for Soda Mountain Solar Project

Good morning, Hannah. Happy new year. I hope you had a good holiday season. I am thrilled that we published the Staff Assessment on Dec 29th.

We are scheduled to host the Staff Assessment Public Meeting on February 5th from 1 pm to 5 pm. Keep in mind, it could be shorter than that, or extend beyond that. As you know, we cannot provide any food or water. If you wish to do so, that is fine.

As far as our regularly scheduled meeting on Tuesdays, I think we can cancel them and meet as needed.

Let me know if that works for you.

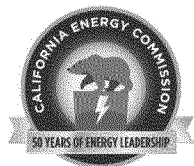
Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission

Website: www.energy.ca.gov



From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 1/27/2026 6:16:25 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Soda Mountain billing information for costs exceeding the non-refundable deposit

Thanks for that Hannah. Unfortunately, I don't have that information.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Monday, January 26, 2026 3:24 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Soda Mountain billing information for costs exceeding the non-refundable deposit

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Hi Lisa,

Dustin is the person for this, please see below for his contact info. Also - Do you have an estimate for how close we are to the limit? Thank you! -Hannah

Dustin Thaler
VC Renewables
110 Edison Place, Suite 312
Newark, NJ 07102
M: 201-275-4862
E: dut@vcrenewables.com

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Monday, January 26, 2026 2:05 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Soda Mountain billing information for costs exceeding the non-refundable deposit

Hi Hannah,

SB 172 modified the costs, fees, and deposits, related to certifying and monitoring energy facilities. In addition to a nonrefundable deposit of \$750,000, statutory amendments direct the Executive Director to invoice and collect "actual costs incurred by the commission in excess of the deposit." (Pub. Resources Code, § 25806, subd. (a).)

Given that, I need to get the name and address of the person we will send the invoices to, if and when actual costs incurred for Soda Mountain Solar Project exceeds the deposit.

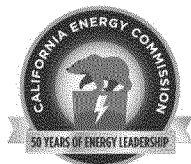
Can you get me that information?

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 1/31/2026 12:50:30 AM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Applicant remarks for Soda Mountain Staff Assessment public meeting

Hi Hannah,

During your applicant remarks, it would be helpful to note that the CEC staff's environmentally superior alternative, BHS Buffer and Bess Relocation Alternative #2 is feasible for the applicant.

See you next week.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



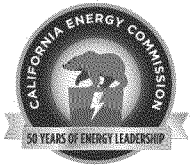
From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 1/13/2026 5:19:47 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
Subject: Re: Soda MTN: high-resolution imagery

CEC does not have this data.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Monday, January 12, 2026 4:52 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Fw: Soda MTN: high-resolution imagery

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

Do you know who at CEC might be able to provide Rincon with this information?

Thank you,
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Chris Huntley <Chuntley@aspeneg.com>
Sent: Monday, January 12, 2026 4:22:15 PM
To: Marlyng Gama <mgama@rinconconsultants.com>

Cc: David Daitch <ddaitch@rinconconsultants.com>; Hannah Arkin <hannah@resolutionenvironmental.com>; Emily Gaston <egaston@rinconconsultants.com>; Thea Benson <tbenson@rinconconsultants.com>; David, Travis@Energy <travis.david@energy.ca.gov>

Subject: Re: Soda MTN: high-resolution imagery

Marlyng,

Looping in CEC GIS staff as they may have a link to that data set.

Travis, do you have access that the SWCA high resolution aerial imagery for the Soda Mountain Project- It is from the SWCCA Delineation.

Best regards,

Chris



Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneg.com

Agoura Hills | San Francisco | Sacramento | Inland Empire | Palm Springs

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From: Marlyng Gama <mgama@rinconconsultants.com>

Sent: Monday, January 12, 2026 3:01 PM

To: Chris Huntley <Chuntley@aspeneg.com>

Cc: David Daitch <ddaitch@rinconconsultants.com>; Hannah Arkin <hannah@resolutionenvironmental.com>; Emily Gaston <egaston@rinconconsultants.com>; Thea Benson <tbenson@rinconconsultants.com>

Subject: Soda MTN: high-resolution imagery

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If suspicious, do not click links, open attachments, or provide credentials.

Hi Chris,

Would you be able to provide the high-resolution imagery provided by SWCA. Our team is getting ready to evaluate the data however the folks at SWCA that managed the data are currently out of office and we would like to get started earlier rather than later. Our team can provide a share file link if needed.

Many Thanks.

SMSP02703



Marlyng Gama

Supervising Biologist

mgama@rinconconsultants.com

805-644-4455 Main | 805-880-0514 Direct

From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 1/21/2026 9:42:04 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
CC: Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Public Review Meeting

Here is the information.

You are invited to a Zoom webinar.

When: Feb 5, 2026 01:00 PM Pacific Time (US and Canada)

Topic: Soda Mountain Staff Assessment Public Meeting

Please click the link below to join the webinar:

<https://energy.zoom.us/j/82770156561?pwd=h3hpjNVbku8wXtUSkq9q7ojc7QvaQa.1>

Password: 350361

Or iPhone one-tap :

US: +16692192599,,82770156561# or +12133388477,,82770156561#

Or Telephone:

Dial:

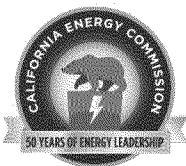
US: +1 669 219 2599 or +1 213 338 8477 or +1 971 247 1195 or +1 206 337 9723 or +1 346 248 7799 or +1 602 753 0140 or +1 720 928 9299 or +1 929 436 2866 or +1 646 518 9805 or +1 651 372 8299 or +1 786 635 1003

Webinar ID: 827 7015 6561

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



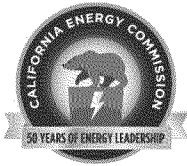
From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, January 21, 2026 1:11 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Public Review Meeting

We don't have the zoom link yet. I will check up on that and get back to you.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Wednesday, January 21, 2026 1:08 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Public Review Meeting

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Great, thank you! I appreciate this information and will be prepared to speak on behalf of the applicant.

Could you also please share the public notice with me for the meeting and the associated call-in information? We have some team members that would like to view the hearing virtually. Apologies if I missed this information being sent, but I don't see it posted on the docket/home page yet.

Thanks!
Hannah

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, January 21, 2026 12:04 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Public Review Meeting

Hi Hannah,

I don't believe we need a tv as I believe the conference room has several installed. My IT person is confirming resources on site.

The meeting is set for Feb 5th from 1 to 5 pm at the Holiday Inn Express, Barstow.

After the CEC staff presentation, b, we will have a slide to introduce the applicant so that you can say a few words before we have the Public Advisors Office do a presentation on public participation and open up for agency, tribe, and public comments.

The applicant's remarks is not the time to go item by item, but you could make an overall statement, and indicate your intent to file into the docket your specific comments on the Staff Assessment, if that is what you intend to do, particularly if you have any corrections you believe should be made. Also, we are not looking for a power point presentation from the applicant.

I hope that is helpful. I apologize if I did not represent your options correctly before now. It is true this presentation is focused on presentation of our Staff Assessment analysis and hear comments from agencies, tribes, and the public, we would appreciate if you had some overall statement you wish to make.

Thanks kindly,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Tuesday, January 20, 2026 10:56 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Public Review Meeting

SMSP02707

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Hi Lisa,

I hope you had a great weekend. I'm just checking in to confirm our public hearing meeting for the DEIR is Thursday, Feb 5th from 1-5pm at the Holiday Inn Express in Barstow. Do you need me to provide a tv screen for the hearing, like last time? Also - Is there also a zoom link available for the hearing yet?

Thank you!
Hannah

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

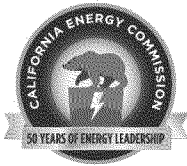
From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 1/27/2026 5:09:19 PM
To: Otahal, Christopher D [cotahal@blm.gov]
Subject: Fw: Soda Mountain Solar Project Staff Assessment Public Meeting- February 5, 2026

FYI. I also sent this to Marc Stammer.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Tuesday, January 27, 2026 8:18 AM
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Subject: Soda Mountain Solar Project Staff Assessment Public Meeting- February 5, 2026

Hello,

On February 5, 2026, the CEC staff will host a hybrid public meeting on the Soda Mountain Solar Project to present the Draft Environmental Impact Report, which is included in our Staff Assessment and hear government and public comments. The project is proposes 300 megawatt solar PV with 300 megawatt battery energy storage system in San Bernardino County, California.

The meeting will be accessible via Zoom and in person at Holiday Inn Express- Conference Room, 2700 Lenwood Road, Barstow, CA 92311. The meeting is from 1 P.M to 5:00 P.M. The end time is an estimate based on the proposed agenda. The meeting may end sooner or later than the posted end time.

To join via Zoom. Click on <https://energy.zoom.us/j/82770156561?pwd=h3hpjNVbku8wXtUSkq9q7ojc7QvaQa.1>
Or login in at <https://zoom.us/> and enter the Webinar ID 827 7015 6561 and passcode 350361 and follow all prompts.

To join by telephone. Call (669) 219-2599. When prompted, enter the Webinar ID 827 7015 656 and passcode 350361.

The 60-day public comment period closes at 5:00 P.M. on February 27, 2026. Here is a link to the public notice:
[Notice of Soda Mountain Solar Project CEC Staff Assessment Public Meeting February 5, 2026](#)

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Chris Huntley [Chuntley@aspeneg.com]
Sent: 1/13/2026 1:21:25 AM
To: David, Travis@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=08b483b8d5464b41b536daf809eb1a0d-David, Trav]; Marlyng Gama [mgama@rinconconsultants.com]
CC: David Daitch [ddaitch@rinconconsultants.com]; Hannah Arkin [hannah@resolutionenvironmental.com]; Emily Gaston [egaston@rinconconsultants.com]; Thea Benson [tbenson@rinconconsultants.com]
Subject: Re: Soda MTN: high-resolution imagery

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Travis,

Thank you for letting us know. They will have to ask SWCA directly.

Best,

Chris

[Get Outlook for iOS](#)

From: David, Travis@Energy <travis.david@energy.ca.gov>
Sent: Monday, January 12, 2026 4:34:53 PM
To: Chris Huntley <Chuntley@aspeneg.com>; Marlyng Gama <mgama@rinconconsultants.com>
Cc: David Daitch <ddaitch@rinconconsultants.com>; Hannah Arkin <hannah@resolutionenvironmental.com>; Emily Gaston <egaston@rinconconsultants.com>; Thea Benson <tbenson@rinconconsultants.com>
Subject: RE: Soda MTN: high-resolution imagery

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If suspicious, do not click links, open attachments, or provide credentials.

Hi Chris, I do not have access to SWCA High Resolution Aerial Imagery for the Soda Mountain project.

Travis David
Electric Generation System Specialist
Siting, Transmission and Environmental Protection Division

From: Chris Huntley <Chuntley@aspeneg.com>
Sent: Monday, January 12, 2026 4:22 PM
To: Marlyng Gama <mgama@rinconconsultants.com>
Cc: David Daitch <ddaitch@rinconconsultants.com>; Hannah Arkin <hannah@resolutionenvironmental.com>; Emily Gaston <egaston@rinconconsultants.com>; Thea Benson <tbenson@rinconconsultants.com>; David, Travis@Energy <travis.david@energy.ca.gov>
Subject: Re: Soda MTN: high-resolution imagery

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Marlyng,

Looping in CEC GIS staff as they may have a link to that data set.

Travis, do you have access that the SWCA high resolution aerial imagery for the Soda Mountain Project- It is from the SWCCA Delineation.

Best regards,

Chris



Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneg.com

Agoura Hills | San Francisco | Sacramento | Inland Empire | Palm Springs

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From: Marlyng Gama <mgama@rinconconsultants.com>

Sent: Monday, January 12, 2026 3:01 PM

To: Chris Huntley <Chuntley@aspeneg.com>

Cc: David Daitch <ddaitch@rinconconsultants.com>; Hannah Arkin <hannah@resolutionenvironmental.com>; Emily Gaston <egaston@rinconconsultants.com>; Thea Benson <tbenson@rinconconsultants.com>

Subject: Soda MTN: high-resolution imagery

Caution: This email originated outside the organization. Do not click on links or open attachments unless you recognize the sender and know the content is safe. If the email is a phish or spam, please report it using the "Report Message" button.

If suspicious, do not click links, open attachments, or provide credentials.

Hi Chris,

Would you be able to provide the high-resolution imagery provided by SWCA. Our team is getting ready to evaluate the data however the folks at SWCA that managed the data are currently out of office and we would like to get started earlier rather than later. Our team can provide a share file link if needed.

Many Thanks.

SMSP02712



Marlyng Gama

Supervising Biologist

mgama@rinconconsultants.com

805-644-4455 Main | 805-880-0514 Direct

From: Ackerman, James@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3CC35DE240CF4253AF9CC7D3D2CBB643-ACKERMAN, J]
Sent: 2/26/2026 9:38:02 PM
To: Zimmerman, Jan@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6a535479ac2448c29afb308a1cd6fede-Waterboards]
CC: Steinert, Tiffany@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fdbc9163bf404f4d84f0a53c6ed84ab0-Waterboards]; Guerra, Christina@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3c08929c117e4da5bfb45f48fa749c0a-Waterboards]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Poach, Alonzo@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4296624036a34d9984d6c25c5c4f96b8-Waterboards]
Subject: RE: Dredge and Fill WDRs for Soda Mountain Solar Project
Attachments: SWRCB_CEC Opt-in Coordination Plan_09.26.2022.pdf

Jan: Please find attached the MOU between the CEC and the SWCRB/RWQCBs.

I have highlighted the two instances where the 90-day review period following project certification is mentioned.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>
Sent: Thursday, February 26, 2026 1:00 PM
To: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Cc: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Poach, Alonzo@Waterboards <Alonzo.Poach@Waterboards.ca.gov>
Subject: RE: Dredge and Fill WDRs for Soda Mountain Solar Project

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James, Tiffany and Christina are the regional board contacts for dredge/fill WDRs. Alonzo Poach is the now the Division Manager for our Victorville office.
Can you point us to the MOU section you are referring to (and include a pdf of the MOU)?

Our review period starts when we receive an application. For WDRs, generally, we have 30 days to review the application. If its complete, it may take up to 180 days to issue the WDRs. If we can enroll a project under a General Order, the timeline for issuance is much shorter.

Thanks.



Jan Zimmerman

Assistant Executive Officer

R6 LAHONTAN

Regional Water Quality Control Board

Email: jan.zimmerman@waterboards.ca.gov

Phone: +1 (760) 241-7376

Cell: +1 (760) 553-4989

2501 Lake Tahoe Blvd., So. Lake Tahoe, CA 96150 |

15095 Amargosa Rd., Bldg. 2, Suite 210, Victorville CA 92394

Website: www.waterboards.ca.gov

From: Ackerman, James@Energy <james.ackerman@energy.ca.gov>

Sent: Thursday, February 26, 2026 12:19 PM

To: Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>

Cc: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>

Subject: Dredge and Fill WDRs for Soda Mountain Solar Project

Caution: External Email. Use caution when clicking links or opening attachments. When in doubt, contact DIT or use the Phish Alert Button.

Jan: On December 29, 2025, CEC submitted the preliminary staff assessment for the Soda Mountain Solar Project.

Part of the project would entail rip-rapping road crossing of drainage channels identified as “Waters of the State” requiring the applicant to apply for “dredge and fill” WDRs.

However, in a meeting today with the applicant expressed that they were under the impression they should not have any contact with the RWQCB and subsequently have not applied for the dredge and fill WDRs.

The applicant expressed their willingness to submit the dredge and fill application once the situation was clearly explained.

I regret not following up earlier on this aspect of the certification process.

My question now is who should be the LRWQCB for the dredge and fill WDRs; you, Christina, or Tiffany?

Also, our project manager Lisa Worrall is curious if the LRWQCB can review the dredge and fill WDR within the 90-day period per the MOU?

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



California Energy Resources Conservation and Development Commission (Energy Commission)

Public Resources Code section 25545.5 Coordination Plan Developed in Consultation with

The California State Water Resources Control Board and the California Regional Water Quality Control Boards

Regarding

Assembly Bill No. 205 (AB 205), Chapter 6.2, Certification of Nonfossil-Fueled Powerplants, Energy Storage Facilities, and Related Facilities

I. PURPOSE:

The purpose of this plan is to set forth the consultation process between the Energy Commission and the California State Water Resources Control Board and the California Regional Water Quality Control Boards (collectively, the Water Boards) as required by subdivision (b) of Public Resources Code section 25545.5, addressing certification pursuant to Chapter 6.2 of Division 15 of the Public Resources Code. This plan is designed to ensure timely and effective coordination between the Energy Commission, the State Water Board, and the applicable Regional Water Board with respect to any proposed Energy Commission findings and actions related to discharges of waste that could affect the quality of waters of the state and ensures that all discharges are consistent with all applicable provisions of Division 7 of the Water Code.

II. AUTHORITIES:

- A. Chapter 6.2 of Division 15 of the Public Resources Code establishes a new certification process for solar photovoltaic, terrestrial wind electrical generation powerplants, or thermal powerplants that do not use fossil or nuclear fuels, with a generating capacity of 50 megawatts or more; an energy storage system capable of storing 200 megawatt-hours or more of electricity; an electric transmission line from those generating or storage facilities to a point of junction with an interconnected electrical transmission system; or a facility for the manufacture, production, or assembly of energy storage systems or their components, wind systems or their components, solar photovoltaic systems or their components, or specialized products, components, or systems that are integral to renewable energy or energy storage technologies with a capital

investment of at least \$250,000,000 over a period of 5 years. These facilities are hereinafter referred to as "opt-in facilities" or "projects."

- B. A person proposing to construct opt-in facilities, may, no later than June 30, 2029, file an application for certification with the Energy Commission. The Energy Commission must review the application and determine whether to issue the certification within 270 days after the application is deemed complete, or as soon as practicable thereafter. The Energy Commission is the lead agency for opt-in facilities under the California Environmental Quality Act (CEQA).
- C. The Water Boards are responsible for protecting the quality of the state's waters through the control of waste discharges to land or water. The Water Boards accomplish these objectives, in part, through implementation of the Federal Clean Water Act (33 United States Code section 1251 et seq.) and the Porter-Cologne Water Quality Control Act (California Water Code section 13000 et seq.).
- D. The Energy Commission's licensing authority for opt-in facilities pursuant to Public Resources Code section 25545.1, subdivision (a) does not supersede the authority of the Water Boards. Public Resources Code section 25545.5, subdivision (b) directs the Energy Commission to develop a plan in coordination with the State Water Board that ensures timely and effective consultation between the staffs of the Energy Commission, the State Water Board, and the applicable Regional Water Board with respect to any proposed Energy Commission findings and actions related to discharges of waste that could affect the quality of waters of the state and to ensure that all discharges are consistent with all applicable provisions of Division 7 of the Water Code.
- E. The staffs of the Energy Commission and the Water Boards agree to use their best efforts to coordinate their review of opt-in facilities to identify and analyze project-related impacts and mitigation measures related to the discharge of waste that may affect the waters of the state. While the terms set forth in this plan are non-binding, the staffs of the Energy Commission and the Water Boards are committed to the timely exchange of project information and analyses, maintenance of clear lines of communication among the agencies' staffs, and best efforts to complete review and analyses within the applicable time limitations for final decisions on an application for certification.

III. IMPLEMENTATION:

A. Regarding duties and responsibilities related to pre-filing communication, the staffs of the Energy Commission and the Water Boards agree to the following:

1. The Energy Commission staff will timely notify the appropriate Water Boards' managers, identified in Attachment A, of pre-filing contacts by potential applicants for opt-in facilities and shall forward any information provided in those contacts by potential applicants as soon as practicable. Energy Commission managers shall also identify in writing the Energy Commission staff assigned to work on each opt-in facility as soon as practicable.
2. Upon receipt of pre-filing project information sent by the Energy Commission staff, the Water Boards' managers will timely respond acknowledging such receipt. The Water Boards' managers will also inform the Energy Commission in writing as to which staff will be assigned to review and comment on the project.
3. The Energy Commission staff will invite the Water Boards' staff to attend any meetings with potential project applicants relating to the proposed project to promote early identification of issues, regulatory requirements and information needed for a complete evaluation of the proposed project application by the Energy Commission and the Water Boards. The Water Boards' staff may, to the extent feasible and appropriate, participate in such meetings.
4. The Water Boards' staff will notify Energy Commission managers, identified in Attachment A, whenever they are contacted by potential opt-in facility applicants seeking information about the nature and scope of studies required for National Pollutant Discharge Elimination System (NPDES) Permits, Waste Discharge Requirements, Section 401 Certification or Waiver, or site remediation activities.
5. The Water Boards' staff will invite Energy Commission staff to attend any meetings held in conjunction with Section A.4. above to promote early disclosure of potential projects. Energy Commission staff will, to the extent feasible and appropriate, participate in such meetings.
6. Attachment A contains a list of the managers at the Energy Commission, State Water Board, and Regional Water Boards who will assign staff to process project applications from opt-in facilities. Any listed agency may update Attachment A via email to the contacts listed for each of the other agencies. Staff assigned to work on specific

projects will be identified in accordance with subsections 1 and 2 of this section.

B. Regarding duties and responsibilities to expedite regulatory review, the staffs of the Energy Commission and the Water Boards will make best efforts to apply the following protocols:

1. No later than 3 days after receipt of an application, the Energy Commission staff will send an electronic copy of any application for certification for an opt-in facility and any other pertinent documents to the appropriate Water Boards' staff.
2. As soon as practicable, but no later than 3 days following the receipt of the application for certification, the Energy Commission staff will send Water Boards' staff the project schedule in effect for that siting case, such as the schedule included in Attachment B. The project schedule shall identify the various events and deadlines where input from or participation by the Water Boards is requested. Water Boards' staff shall endeavor to participate in the applicable events and meetings and provide timely comments and documents within the timeframe of the Energy Commission's proceeding.
3. Within 15 days of receipt of the application for certification, Water Boards' staff will review the application for certification to determine whether it contains all the information required to apply for the following permits, if applicable: Waste Discharge Requirements, NPDES Permits, and/or a Section 401 Certification or Waiver from the Regional Board; and Water Boards' staff will identify and notify Energy Commission staff of any data deficiencies.
4. During the Energy Commission's preparation of a draft environmental impact report (Draft EIR) on a proposed project, Water Boards' staff will consult with Energy Commission staff regarding potential impacts to waters of the state and will provide Energy Commission staff with their projected conditions for the applicable NPDES Permits, Waste Discharge Requirements, and/or Section 401 Certification or Waiver according to the project schedule. The Water Boards' staff shall use their best efforts to meet a time schedule that will allow the Energy Commission staff to include the Water Boards' recommended conditions for the applicable NPDES Permit(s), Waste Discharge Requirements, and/or Section 401 Certification or Waiver within the Draft EIR.
5. During the public comment period on a proposed project's Draft EIR, Energy Commission staff will transmit public comments related to

discharges of waste that could affect the quality of waters of the state to the Water Boards for further review and response as necessary. Energy Commission staff will invite Water Boards' staff to attend and participate in any Public Meetings on a proposed project's Draft EIR. Water Boards' staff may, to the extent feasible and appropriate, participate in any such meetings.

6. Water Boards' staff will prepare a draft NPDES Permit (or permits), Waste Discharge Requirements, and/or Section 401 Certification or Waiver according to a time schedule that will be provided to the Energy Commission staff. The Water Boards' staff shall use its best efforts to meet a time schedule that will allow the Energy Commission staff to include the draft permit, discharge requirements, and/or certification or waiver within the Draft EIR.
7. Energy Commission staff will inform the Water Boards' staff of its completion of the final environmental impact report (Final EIR) on a proposed project. Energy Commission staff will also inform Water Boards' staff of when the proposed project will be scheduled for review and decision at an Energy Commission Business Meeting. If the Energy Commission approves a proposed project, Energy Commission staff will inform Water Boards' staff within 3 days of the project's approval.
8. Energy Commission staff will recommend that compliance with the permit(s) and/or waste discharge requirements be made a condition of certification by the Energy Commission.
9. The Water Boards recognize that they are required by Public Resources Code section 25545.5, subdivision (d)(2), to take final action on the opt-in facility within 90 days after the certification by the Energy Commission of the environmental impact report, provided that the applicant has filed a complete application with the applicable Water Board prior to certification of the Final EIR.

C. Regarding duties and responsibilities related to disagreement resolution, the staffs of the Energy Commission and the Water Boards agree:

1. Where the staffs of the Energy Commission and Water Boards disagree on any proposed conditions of certification, Energy Commission staff will coordinate meetings to discuss issues in dispute and encourage meaningful resolution.
2. If resolution is not achieved within 14 days after the initial meeting convened to resolve a dispute in accordance with subsection 1 of this section, the Director for the Energy Commission's Siting, Transmission, and Environmental Protection (STEP) Division and the Water Boards'

Deputy Director or Assistant Executive Officer, as applicable, will, along with their respective technical staff and legal counsel, meet and confer to resolve the disagreement.

3. In the event resolution is not achieved by the process in subsection 2, above, the Energy Commission Executive Director and Water Boards' Executive Director or Executive Officer will, along with their respective technical staff and legal counsel, meet and confer to resolve the disagreement.

IV. AMENDMENTS

This plan may be amended at any time when new information develops or as requested by the Energy Commission or Water Boards. The plan shall otherwise remain in effect.

Attachment A

State Water Resources Control Board (State Water Board) and Regional Water Quality Control Board (Regional Water Board) Staff Contact List for AB 205 Projects

State Water Board

Phil Crader

North Coast Regional Water Board

Matt St. John

San Francisco Regional Water Board

Elizabeth Morrison

Central Coast Regional Water Board

Harvey Packard

Thea Tryon

Los Angeles Regional Water Board

Adam Taing

Lahontan Regional Water Board

Jan Zimmerman

Colorado River Basin Regional Water Board

Logan Raub

Santa Ana Regional Water Board

Ann Sturdivant

San Diego Regional Water Board

Eric Becker

California Energy Commission

Contact List for Opt-in Facility Matters

Primary Contact:

Eric Knight
Manager
Siting & Environmental Branch
Siting, Transmission & Environmental Protection (STEP) Division
(916) 591-9931
Eric.Knight@energy.ca.gov

Project Manager:

[TBD when Opt-in Project application is submitted]

Attachment B

TIMELINE (DAYS)	ACTIVITY	ENERGY COMMISSION RESPONSIBILITIES	WATER BOARDS RESPONSIBILITIES
Pre-filing Period	Pre-filing Consultation	Energy Commission staff to provide notification to Water Boards of pre-filing contacts by potential opt-in applicants and to forward any information provided by potential applicants to Water Boards. Energy Commission to invite Water Boards to attend pre-filing meetings with potential applicants.	Water Boards to timely respond to Energy Commission staff acknowledging receipt of information from potential opt-in applicants. Water Boards to notify Energy Commission staff of any contacts from potential applicants. To the extent feasible, Water Boards will attend pre-filing meetings with potential applicants.
-30	Application Submitted	Within 3 days of receiving an application, Energy Commission staff to email appropriate Board and Regional Board staff to identify personnel, transmit application materials, and begin coordination, to include sharing of information and invite immediate Board and Regional Board review and comment, particularly upon survey methodology and need for permits.	Within 15 days of receiving the application materials from Energy Commission staff, Board and Regional Board staff will review the application and comment on survey methodology, the need for permits, and request any other information the Board and Regional Board needs to assess the proposed project.
0		Transmit Application to Responsible/Trustee Agencies and Publish Summary in Newspaper	
0 (DATE)	Application Deemed Complete: 30 days after submission or upon acceptance of	Energy Commission staff to transmit Application to Board and Regional Board staff	Board and Regional Board staff to begin review and to formulate additional comments as necessary

	additional information requested by staff within 30 days of submission		
3	Notice of Preparation (NOP)	Energy Commission staff to prepare and submit NOP	
3-30	Public Scoping Meeting Near Site	Energy Commission staff to conduct a site visit	Board and Regional Board to provide personnel to attend a site visit
10-30	Informational Meeting Near Site (may be with Scoping Meeting)	Energy Commission staff to conduct information meeting as necessary (if not already conducted during Public Scoping Meeting)	Board and Regional Board to provide personnel to attend a site visit with Energy Commission staff, unless already conducted during Public Scoping Meeting
	Public Workshop in Community	Energy Commission staff to arrange and host a Public Workshop, obtain information and comments	Board and Regional Board to provide personnel in attendance as available
30-100	Preparation of Draft Environmental Impact Report (EIR)	Energy Commission staff to prepare Draft EIR	Board and Regional Board to provide conditions for: Waste Discharge Requirements, NPDES Permit, and/or a Section 401 Certification or Waiver from the appropriate Regional Board
30-150	Publish Notice of Availability & Draft EIR	Energy Commission staff to publish Draft EIR	
(+)60	Public Comment Period and Public Meeting on Draft EIR	Energy Commission staff to host public meeting, receive and begin response to public comments. Energy Commission staff will transmit comments to Board and Regional Board	Board and Regional Board to provide staff to attend the public meeting as deemed necessary

		for further review and refinement as necessary.	
240	Final EIR issued	Energy Commission staff to publish Final EIR	
270	Final EIR		
270	Business Meeting Decision	Energy Commission staff to host Business Meeting	
273	Transmit Final Certificate	Energy Commission staff to transmit electronic copy of Final Certificate to Water Boards	
275	Prepare Record of Proceeding	Energy Commission staff to prepare Record of Proceeding	
270-360	Other Agencies Issue Permits (if applicable)		Board and Regional Board to issue applicable Waste Discharge Requirements, NPDES Permit, and/or a Section 401 Certification or Waiver within 90 days of the Energy Commission's approval of a project

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 2/26/2026 10:02:02 PM
To: Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]
CC: Zimmerman, Jan@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6a535479ac2448c29afb308a1cd6fede-Waterboards]; Dustin Thaler [dut@vcrenewables.com]; Steinert, Tiffany@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fdbc9163bf404f4d84f0a53c6ed84ab0-Waterboards]; Guerra, Christina@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3c08929c117e4da5bfb45f48fa749c0a-Waterboards]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]
Subject: Re: LRWQCB Contacts for Dredge and Fill WDRs Application, Soda Mountain Solar Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi James,

Thank you for this email!

Hi Tiffany and Christina - Docket Item Appendix E-4 ([TN 261592](#)) contains the project's application for a WDR. If you require any additional information, please don't hesitate to let me know. As one side note, I will be docketing an updated aquatics resource delineation tomorrow, which should assist in refining both the project's baseline for existing conditions and post-construction conditions.

We appreciate your assistance with this project!

Best,
Hannah

Hannah Arkin
CEO
Resolution Environmental
<https://resolutionenvironmental.com/>
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Sent: Thursday, February 26, 2026 1:30 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>; Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>
Subject: LRWQCB Contacts for Dredge and Fill WDRs Application, Soda Mountain Solar Project

Hannah: Per our meeting this morning, Tiffany Steinert and Christina Guerra will be your contacts from the Lahontan Regional Water Quality Control Board regarding your application for dredge and fill waste discharge requirements (WDRs) for the Soda Mountain Solar Project.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Zimmerman, Jan@Waterboards [jan.zimmerman@waterboards.ca.gov]
Sent: 2/27/2026 9:07:39 PM
To: Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]
CC: Steinert, Tiffany@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fdbc9163bf404f4d84f0a53c6ed84ab0-Waterboards]; Guerra, Christina@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3c08929c117e4da55fb45f48fa749c0a-Waterboards]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Poach, Alonzo@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4296624036a34d9984d6c25c5c4f96b8-Waterboards]; Ponce, Mariah@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc5faa5d564c4cf3a2f49468b736b6c2-b2346f64-e7]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]
Subject: RE: Dredge and Fill WDRs for Soda Mountain Solar Project

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Great, thanks for the update and clarification.
Please keep Christina and Tiffany updated on certification of the Final EIR.
Jan

From: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Sent: Friday, February 27, 2026 12:00 PM
To: Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>
Cc: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Poach, Alonzo@Waterboards <Alonzo.Poach@Waterboards.ca.gov>; Ponce, Mariah@Energy <Mariah.Ponce@Energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Subject: RE: Dredge and Fill WDRs for Soda Mountain Solar Project

Jan: I needed to get confirmation, but as I suspected the 90-day clock would begin when the Final EIR and the project are certified.

Currently that date is anticipated to be April 27, 2026.

Based on our meeting with the applicant yesterday, they intend to apply for the dredge and fill WDR application soon, so hopefully that will give your agency some additional time.

Contact me if you have any further questions or concerns.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966

SMSP02732

Email: james.ackerman@energy.ca.gov



From: Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>
Sent: Thursday, February 26, 2026 3:21 PM
To: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Cc: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Poach, Alonzo@Waterboards <Alonzo.Poach@Waterboards.ca.gov>
Subject: RE: Dredge and Fill WDRs for Soda Mountain Solar Project

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James, the language in the MOU states...

The Water Boards recognize that they are required by Public Resources Code section 25545.5, subdivision (d)(2), to take final action on the opt-in facility within 90 days after the certification by the Energy Commission of the environmental impact report, provided that the applicant has filed a complete application with the applicable Water Board prior to certification of the Final EIR.

When does CEC think the 90 day clock starts? We only received notice of filing an application today, nearly 60 days past certification of the Final EIR. My interpretation is that the 90 day starts today. Do you agree?
Jan

From: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Sent: Thursday, February 26, 2026 1:38 PM
To: Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>
Cc: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Poach, Alonzo@Waterboards <Alonzo.Poach@Waterboards.ca.gov>
Subject: RE: Dredge and Fill WDRs for Soda Mountain Solar Project

Jan: Please find attached the MOU between the CEC and the SWCRB/RWQCBs.

I have highlighted the two instances where the 90-day review period following project certification is mentioned.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966

SMSP02733

Email: james.ackerman@energy.ca.gov



From: Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>
Sent: Thursday, February 26, 2026 1:00 PM
To: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Cc: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Poach, Alonzo@Waterboards <Alonzo.Poach@Waterboards.ca.gov>
Subject: RE: Dredge and Fill WDRs for Soda Mountain Solar Project

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James, Tiffany and Christina are the regional board contacts for dredge/fill WDRs. Alonzo Poach is the now the Division Manager for our Victorville office.

Can you point us to the MOU section you are referring to (and include a pdf of the MOU)?

Our review period starts when we receive an application. For WDRs, generally, we have 30 days to review the application. If its complete, it may take up to 180 days to issue the WDRs. If we can enroll a project under a General Order, the timeline for issuance is much shorter.

Thanks.



Jan Zimmerman

Assistant Executive Officer

R6 LAHONTAN
Regional Water Quality Control
Board

Email:

jan.zimmerman@waterboards.ca.gov

Phone: +1 (760) 241-7376

Cell: +1 (760) 553-4989

2501 Lake Tahoe Blvd., So. Lake
Tahoe, CA 96150 |
15095 Amargosa Rd., Bldg. 2, Suite
210, Victorville CA 92394

Website: www.waterboards.ca.gov

From: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Sent: Thursday, February 26, 2026 12:19 PM
To: Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>
Cc: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-

SMSP02734

Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>

Subject: Dredge and Fill WDRs for Soda Mountain Solar Project

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Jan: On December 29, 2025, CEC submitted the preliminary staff assessment for the Soda Mountain Solar Project.

Part of the project would entail rip-rapping road crossing of drainage channels identified as “Waters of the State” requiring the applicant to apply for “dredge and fill” WDRs.

However, in a meeting today with the applicant expressed that they were under the impression they should not have any contact with the RWQCB and subsequently have not applied for the dredge and fill WDRs.

The applicant expressed their willingness to submit the dredge and fill application once the situation was clearly explained.

I regret not following up earlier on this aspect of the certification process.

My question now is who should be the LRWQCB for the dredge and fill WDRs; you, Christina, or Tiffany?

Also, our project manager Lisa Worrall is curious if the LRWQCB can review the dredge and fill WDR within the 90-day period per the MOU?

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Chris Huntley [Chuntley@aspeneq.com]
Sent: 2/3/2026 4:14:05 PM
To: May Lau [mlau@rinconconsultants.com]; Crisp, Ann@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b89c4de7ece742679d19e1e3ee713dc2-Crisp, Ann@]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Justin Wood [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=86ee559cfc814439b69a025b0961d2a2-536cef40-79]
CC: Hannah Arkin [hannah@resolutionenvironmental.com]; Thea Benson [tbenson@rinconconsultants.com]; Marlyng Gama [mgama@rinconconsultants.com]; David Daitch [ddaitch@rinconconsultants.com]; Emily Gaston [egaston@rinconconsultants.com]
Subject: Re: Soda Mountain - updated transects

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May,

I will take a look at this data today. The data looks very thorough. I assume the drainages on the access road are masked by Transect F. May I get a copy of the shape files so we can overlay this on the aerial. I appreciate all the effort that has gone into sorting this delineation out.

Best regards,

Chris



Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneq.com

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From: May Lau <mlau@rinconconsultants.com>
Sent: Monday, February 2, 2026 5:03 PM
To: Chris Huntley <Chuntley@aspeneq.com>
Cc: Hannah Arkin <hannah@resolutionenvironmental.com>; Thea Benson <tbenson@rinconconsultants.com>; Marlyng Gama <mgama@rinconconsultants.com>; David Daitch <ddaitch@rinconconsultants.com>; Emily Gaston <egaston@rinconconsultants.com>
Subject: Soda Mountain - updated transects

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Hi Chris,

Attached are the new transects based on consideration of gap areas, impact areas, and preliminary mapping of the larger fluvial systems based on MESA. The merged JD data is a combination of SWCA's JD and flow model data and Rincon's JD data. Let us know your thoughts.

Thanks,
May



May Lau

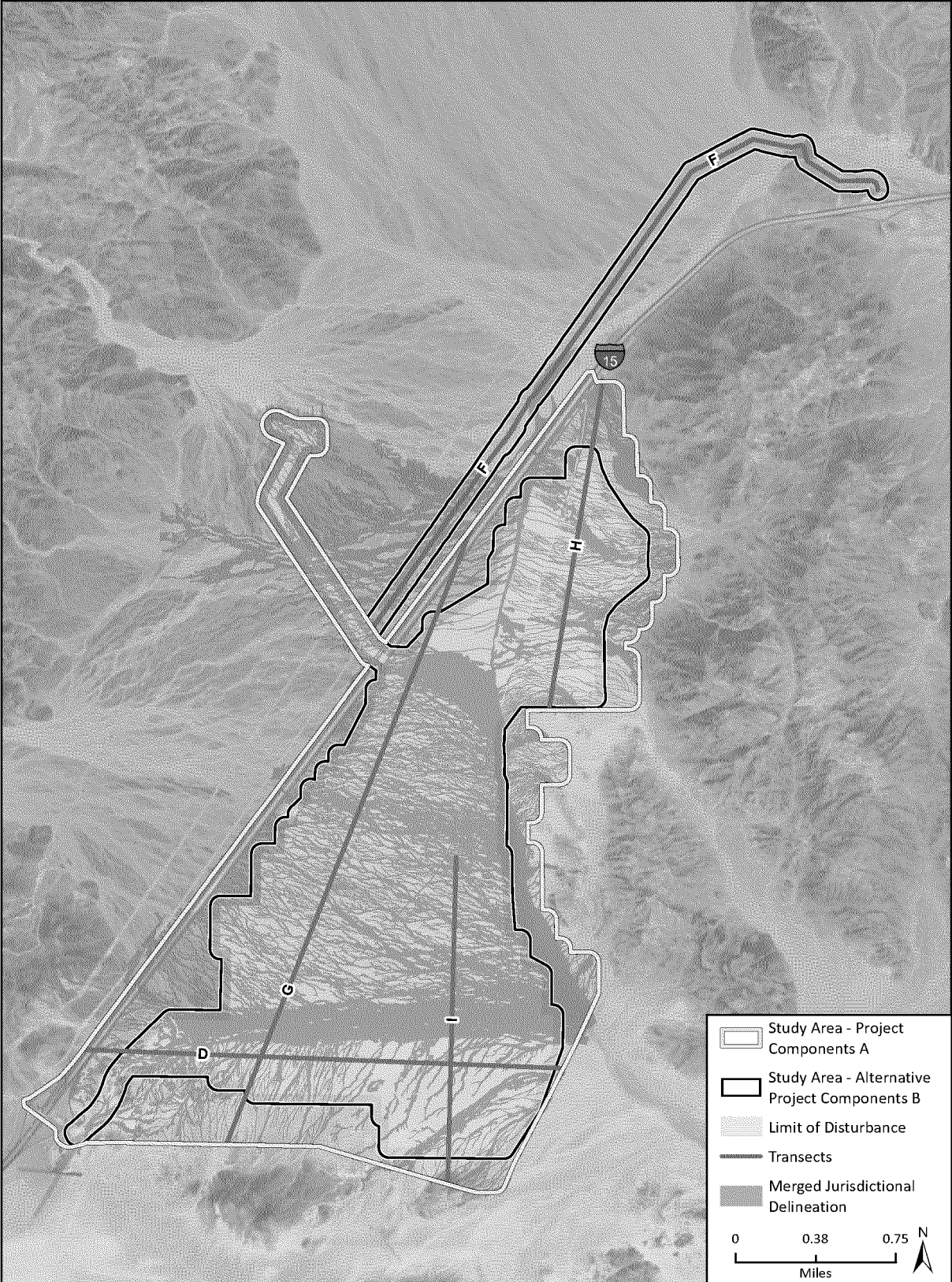
Principal, Natural Resources & Permitting

mlau@rinconconsultants.com

805-644-4455 Main | 310-736-0529 Mobile

Los Angeles, California

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From: Emily Gaston [egaston@rinconconsultants.com]
Sent: 2/3/2026 5:56:08 PM
To: Chris Huntley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=018948a34a3149c4a3833144594ae8b3-ff2eee5c-df]; May Lau [mlau@rinconconsultants.com]; Crisp, Ann@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b89c4de7ece742679d19e1e3ee713dc2-Crisp, Ann@]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Justin Wood [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=86ee559cfc814439b69a025b0961d2a2-536cef40-79]
CC: Hannah Arkin [hannah@resolutionenvironmental.com]; Thea Benson [tbenson@rinconconsultants.com]; Marlyng Gama [mgama@rinconconsultants.com]; David Daitch [ddaitch@rinconconsultants.com]
Subject: Re: [EXT] Re: Soda Mountain - updated transects
Attachments: JD_Merged_2026_UTM11N.zip

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Chris,

Attached are the SHP files containing the merged JD dataset and the updated verification transects.

This data is currently undergoing field verification to identify any data gaps and to confirm feature widths.

For Transect F, the available high-resolution imagery does not extend far enough to fully evaluate the area. As a result, the field team will map the transect along with an additional 250-foot buffer. Because the transect is located directly on a roadway, it will be offset slightly upstream to the northwest to allow for more accurate mapping of the water system in that area.

Once field verification is complete, our GIS team will refine the merged JD dataset and provide you with a finalized product.

Please let me know if you have any questions.

Best,



Emily Gaston, MS
Senior Data Analyst & Drone Program Lead
egaston@rinconconsultants.com
805-644-4455 Main | 916-337-3309 Mobile
Ventura, California

Time Off Alert - February 12-18

From: Chris Huntley <Chuntley@aspeneg.com>
Sent: Tuesday, February 3, 2026 8:14 AM
To: May Lau <mlau@rinconconsultants.com>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Justin Wood <jwood@aspeneg.com>

SMSP02739

Cc: Hannah Arkin <hannah@resolutionenvironmental.com>; Thea Benson <tbenson@rinconconsultants.com>; Marlyng Gama <mgama@rinconconsultants.com>; David Daitch <ddaitch@rinconconsultants.com>; Emily Gaston <egaston@rinconconsultants.com>

Subject: [EXT] Re: Soda Mountain - updated transects

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May,

I will take a look at this data today. The data looks very thorough. I assume the drainages on the access road are masked by Transect F. May I get a copy of the shape files so we can overlay this on the aerial. I appreciate all the effort that has gone into sorting this delineation out.

Best regards,

Chris



Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneg.com

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From: May Lau <mlau@rinconconsultants.com>

Sent: Monday, February 2, 2026 5:03 PM

To: Chris Huntley <Chuntley@aspeneg.com>

Cc: Hannah Arkin <hannah@resolutionenvironmental.com>; Thea Benson <tbenson@rinconconsultants.com>; Marlyng Gama <mgama@rinconconsultants.com>; David Daitch <ddaitch@rinconconsultants.com>; Emily Gaston <egaston@rinconconsultants.com>

Subject: Soda Mountain - updated transects

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Hi Chris,

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SMSP02740

Thanks,
May



May Lau
Principal, Natural Resources & Permitting
mlau@rinconconsultants.com
805-644-4455 Main | 310-736-0529 Mobile
Los Angeles, California

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From: Chris Huntley [Chuntley@aspeneg.com]
Sent: 2/3/2026 6:14:09 PM
To: Emily Gaston [egaston@rinconconsultants.com]; May Lau [mlau@rinconconsultants.com]; Crisp, Ann@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b89c4de7ece742679d19e1e3ee713dc2-Crisp, Ann@]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Justin Wood [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=86ee559cfc814439b69a025b0961d2a2-536cef40-79]
CC: Hannah Arkin [hannah@resolutionenvironmental.com]; Thea Benson [tbenson@rinconconsultants.com]; Marlyng Gama [mgama@rinconconsultants.com]; David Daitch [ddaitch@rinconconsultants.com]
Subject: Re: [EXT] Re: Soda Mountain - updated transects

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Emily,

Thank you and really appreciate the update. Good luck in the field. So far the data is looking good.

Best regards,

Chris



Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneg.com

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CONFIDENTIALITY NOTICE: This email may contain confidential or privileged information for the intended recipient(s) only. Unauthorized use or disclosure is prohibited.

From: Emily Gaston <egaston@rinconconsultants.com>
Sent: Tuesday, February 3, 2026 9:56 AM
To: Chris Huntley <Chuntley@aspeneg.com>; May Lau <mlau@rinconconsultants.com>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Justin Wood <jwood@aspeneg.com>
Cc: Hannah Arkin <hannah@resolutionenvironmental.com>; Thea Benson <tbenson@rinconconsultants.com>; Marlyng Gama <mgama@rinconconsultants.com>; David Daitch <ddaitch@rinconconsultants.com>
Subject: Re: [EXT] Re: Soda Mountain - updated transects

SMSP02742

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Hi Chris,

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Please let me know if you have any questions.

Best,



Emily Gaston, MS
Senior Data Analyst & Drone Program Lead
egaston@rinconconsultants.com
805-644-4455 Main | 916-337-3309 Mobile
Ventura, California

Time Off Alert - February 12-18

From: Chris Huntley <Chuntley@aspeneg.com>

Sent: Tuesday, February 3, 2026 8:14 AM

To: May Lau <mlau@rinconconsultants.com>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Justin Wood <jwood@aspeneg.com>

Cc: Hannah Arkin <hannah@resolutionenvironmental.com>; Thea Benson <tbenson@rinconconsultants.com>; Marlyng Gama <mgama@rinconconsultants.com>; David Daitch <ddaitch@rinconconsultants.com>; Emily Gaston <egaston@rinconconsultants.com>

Subject: [EXT] Re: Soda Mountain - updated transects

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May,

I will take a look at this data today. The data looks very thorough. I assume the drainages on the access road are masked by Transect F. May I get a copy of the shape files so we can overlay this on the aerial. I appreciate all the effort that has gone into sorting this delineation out.

SMSP02743

Best regards,

Chris



Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneg.com

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From: May Lau <mlau@rinconconsultants.com>
Sent: Monday, February 2, 2026 5:03 PM
To: Chris Huntley <Chuntley@aspeneg.com>
Cc: Hannah Arkin <hannah@resolutionenvironmental.com>; Thea Benson <tbenson@rinconconsultants.com>; Marlyng Gama <mgama@rinconconsultants.com>; David Daitch <ddaitch@rinconconsultants.com>; Emily Gaston <egaston@rinconconsultants.com>
Subject: Soda Mountain - updated transects

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Thanks,
May



May Lau

Principal, Natural Resources & Permitting

mlau@rinconconsultants.com

805-644-4455 Main | 310-736-0529 Mobile

Los Angeles, California

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From: Crisp, Ann@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B89C4DE7ECE742679D19E1E3EE713DC2-CRISP, ANN@]
Sent: 2/26/2026 1:39:22 AM
To: Hannah Arkin [hannah@resolutionenvironmental.com]; Chris Huntley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=018948a34a3149c4a3833144594ae8b3-ff2eee5c-df]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Jamison Miner [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e9a371186e0e402a994145a67d6e7684-546eb26e-f8]
Subject: Re: Soda Mt. Staff Assessment

Hi Hannah,

Thank you, we appreciate the agenda. Only BIO staff, plus PM group plus Eric Knight are on this email, I will pass on to the other staff but can't confirm they will attend.

Thanks!

Ann

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Wednesday, February 25, 2026 5:11 PM
To: Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Chris Huntley <chuntley@aspeneg.com>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Jamison Miner <jminer@aspeneg.com>
Subject: Re: Soda Mt. Staff Assessment

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Hi Ann,

Yes, meeting invite to be sent shortly.

We want to briefly discuss:

- BIO-12
- BIO-16
- BIO-21
- WATER-5 and WATER-7
- Worker Safety 10
- COC's that require BLM and LADWP approvals

Hannah Arkin
CEO
Resolution Environmental
<https://resolutionenvironmental.com/>
262 B Avenue, Coronado, CA 92118

SMSP02746

760-504-4109

From: Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>

Sent: Wednesday, February 25, 2026 4:24 PM

To: Hannah Arkin <hannah@resolutionenvironmental.com>; Chris Huntley <chuntley@aspenerg.com>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Cc: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Jamison Miner <jminer@aspenerg.com>

Subject: Re: Soda Mt. Staff Assessment

Hi Hannah,

Thank you for the agenda, could you please provide the specific COCs you want to discuss so we are prepared?

Since you know who you want to invite from your team, would you mind setting up the meeting and adding everyone on this email?

Thanks!

Ann

From: Hannah Arkin <hannah@resolutionenvironmental.com>

Sent: Wednesday, February 25, 2026 2:40 PM

To: Chris Huntley <chuntley@aspenerg.com>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Cc: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Jamison Miner <jminer@aspenerg.com>

Subject: Re: Soda Mt. Staff Assessment

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Hi Chris,

10:30am tomorrow would be great. I really appreciate you all finding the time to quickly meet with us. The intention of this meeting is to have a brief check-in on the items we plan to docket on Friday as part of our Applicant Response Letter to the staff assessment. The items I would like to discuss include:

1. Project Impacts
 - Temporary/Permanent
 - Mitigation/Securities
2. Text Clarifications for Conditions of Certification
3. Updated Jurisdictional Delineation
4. Updated Hydrology Design

Thank you!

Hannah

Hannah Arkin

CEO

Resolution Environmental

www.resolutionenvironmental.com

262 B Avenue, Coronado, CA 92118

760-504-4109

SMSP02747

From: Chris Huntley <Chuntley@aspeneg.com>

Sent: Wednesday, February 25, 2026 1:52 PM

To: Hannah Arkin <hannah@resolutionenvironmental.com>; Crisp, Ann@Energy <ann.crisp@energy.ca.gov>; Worrall, Lisa@Energy <lisa.worrall@energy.ca.gov>

Cc: eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>; Jamison Miner <JMiner@aspeneg.com>

Subject: Re: Soda Mt. Staff Assessment

Hannah,

We can meet tomorrow at 0930 or at 1030 for 30 minutes. Does that work for your team? If so, please send an agenda of what topics you would like to discuss.

Best regards,

Chris



Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneg.com

Agoura Hills | San Francisco | Sacramento | Inland Empire | Palm Springs

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From: Hannah Arkin <hannah@resolutionenvironmental.com>

Sent: Tuesday, February 24, 2026 12:10 PM

To: Crisp, Ann@Energy <ann.crisp@energy.ca.gov>; Chris Huntley <Chuntley@aspeneg.com>; Worrall, Lisa@Energy <lisa.worrall@energy.ca.gov>

Subject: Soda Mt. Staff Assessment

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If suspicious, do not click links, open attachments, or provide credentials.

Hi Ann and Chris,

SMSP02748

The Applicant Team is preparing to submit written comments on the Soda Mountain Staff Assessment, with a focus on the mitigation and associated securities. I wanted to check in and see if we could have a meeting to bring you up to speed on our review and our requested modifications to the Conditions of Certifications. I thought it might be helpful if we had this meeting prior to our submittal on Friday, but if you would prefer we could also have this meeting after the public comment period ends.

If you have any availability tomorrow or Thursday, that would be ideal for our team.

Thank you,
Hannah

Hannah Arkin
CEO
Resolution Environmental
<https://resolutionenvironmental.com/>
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 2/3/2026 3:21:59 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Applicant remarks for Soda Mountain Staff Assessment public meeting

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

I will make sure to note this during my remarks.

We are looking forward to seeing you all in a few days.

Thank you!
Hannah

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Friday, January 30, 2026 4:50:30 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Applicant remarks for Soda Mountain Staff Assessment public meeting

Hi Hannah,

During your applicant remarks, it would be helpful to note that the CEC staff's environmentally superior alternative, BHS Buffer and Bess Relocation Alternative #2 is feasible for the applicant.

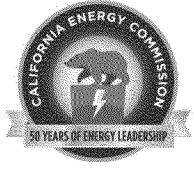
See you next week.

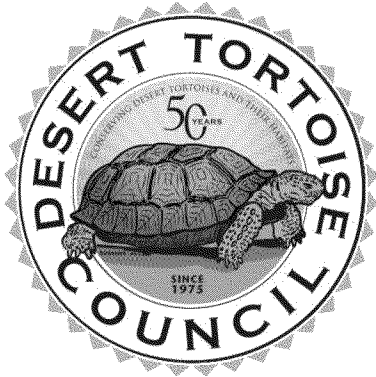
Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov





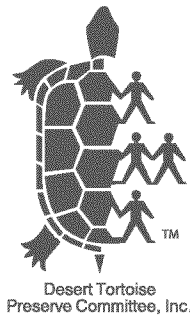
DESERT TORTOISE COUNCIL

3807 Sierra Highway #6-4514

Acton, CA 93510

www.deserttortoise.org

eac@deserttortoise.org



**DESERT TORTOISE PRESERVE
COMMITTEE, INC.**

P.O. Box 940

Ridgecrest, CA 93556

www.Tortoise-Tracks.org

roger.dale@tortoise-tracks.org

Via email only

February 25, 2026

To: Lisa Worrall
California Energy Commission
715 P Street
Sacramento, CA 95814
STEPsiting@energy.ca.gov

Re: Draft Environmental Impact Report (Included Within Staff Assessment) for the Proposed Soda Mountain Solar Project (24-OPT-03)

Dear Ms. Worrall,

The Desert Tortoise Council (DTC) is a non-profit organization comprising hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of desert tortoise species. Established in 1975 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the DTC routinely provides information and other forms of assistance to individuals, organizations, and regulatory agencies on matters potentially affecting desert tortoises within their geographic ranges.

The Desert Tortoise Preserve Committee (DTPC) is a non-profit organization formed in 1974 to promote the welfare of the desert tortoise in its native wild state. DTPC members share a deep concern for the continued preservation of the tortoise and its habitat in the southwestern deserts and are dedicated to the recovery and conservation of the desert tortoise and other rare and endangered species inhabiting the Mojave and western Sonoran deserts. The DTPC has a long track record of protecting desert tortoises and their habitat through land acquisition, preserve management, mitigation land banking, and educational outreach.

Both our physical and email addresses are provided above in our letterhead for your use when providing future correspondence to us. When given a choice, we prefer to receive emails for future correspondence, as mail delivered via the U.S. Postal Service may take several days to be delivered. Email is an “environmentally friendlier way” of receiving correspondence and documents rather than “snail mail.”

The Mojave desert tortoise is among the top 50 species on the list of the world’s most endangered tortoises and freshwater turtles. The International Union for Conservation of Nature’s (IUCN) Species Survival Commission, Tortoise and Freshwater Turtle Specialist Group, now considers the Mojave desert tortoise to be Critically Endangered (Berry et al. 2021), “... based on population reduction (decreasing density), habitat loss of over 80% over three generations (90 years), including past reductions and predicted future declines, as well as the effects of disease (upper respiratory tract disease/mycoplasmosis). *Gopherus agassizii* (sensu stricto) comprises tortoises in the most well-studied 30% of the larger range; this portion of the original range has seen the most human impacts and is where the largest past population losses have been documented. A recent rigorous rangewide population reassessment of *G. agassizii* (sensu stricto) has demonstrated continued adult population and density declines of about 90% over three generations (two in the past and one ongoing) in four of the five *G. agassizii* recovery units and inadequate recruitment with decreasing percentages of juveniles in all five recovery units.”

This status, in part, prompted the DTC and DTPC to petition the California Fish and Game Commission (Commission) in March 2020 to elevate the listing of the Mojave desert tortoise from Threatened to Endangered under the California Endangered Species Act (CESA) (Defenders of Wildlife et al. 2020). Importantly, following California Department of Fish and Wildlife’s (CDFW) (2024a) status review, in their April 2024 meeting the Commission voted unanimously to accept the CDFW’s petition evaluation and recommendation to uplist the tortoise from threatened to endangered under the CESA based on the scientific data provided on the species’ status, declining trend, numerous threats, and lack of effective recovery implementation and land management (CDFW 2024b). On July 15, 2025, the tortoise was officially uplisted to endangered status under the CESA (Commission 2025).

Thank you for contacting the DTC on 12/29/2025 with the opportunity to comment on this proposed project. This enabled us to attend the webinar on February 5, 2026 where the ratio of opposition to support for the project was 10:1. Our opposition to the project is based on specific concerns that we have expressed in numerous comment letters since 2012. In fact, the DTC contends that most of the concerns expressed in the following comment letters remain valid [see **green highlighted items** in DTC (2025)], many of them are not addressed in the Staff Assessment Environmental Impact Report (SA-EIR), are herein incorporated by reference, and we expect will be addressed in the Final Environmental Impact Report (FEIR):

Desert Tortoise Council (2012): <https://www.dropbox.com/scl/fi/ingb7rp1h8itqq44oatkr/Soda-Mountain-Desert-Tortoise-Council-Scoping-Comments.12-13-2012.pdf?rlkey=uj6xar4ri0pw97hiomlm2eb6d&dl=0>

Desert Tortoise Council (2014): <https://www.dropbox.com/scl/fi/dyuhk8vrbc8cjxak4uupx/Soda-Mountain-Comment-Letter.3-1-2014.pdf?rlkey=2iw350060qplbtq2zhmjcn1rx&dl=0>

Desert Tortoise Council (2016): <https://www.dropbox.com/scl/fi/415ngw90fczcvqos6fmya/Soda-Mountain-Comments.8-12-2016.pdf?rlkey=nwj44jqebbjhd3us83sodpwfu&dl=0>

Desert Tortoise Council (2023): <https://www.dropbox.com/scl/fi/0n30cj81lvua4gl138v3q/Soda-Mountain-Solar.2-16-2023.pdf?rlkey=4qs53z0gxv0xre8hksnj8nrmd&dl=0>

Desert Tortoise Council (2025): <https://www.dropbox.com/scl/fi/8jzzwys4o4tugu919xvp1/Soda-Mtn.-Solar-Project-Scoping-Comments-to-CEC.9-3-2025.pdf?rlkey=rlurds33ca5a4tzyxpym1u1ec&dl=0>

Our review of the SA-EIR is that the project has not substantially changed from its most recent iteration, which was denied for a number of environmentally significant reasons. Unless otherwise noted, page numbers cited herein are from the SA-EIR dated December 2025.

(1) The proposed project still does not involve a valid alternative as this latest proponent continues to attempt to situate the proposed solar site in near-pristine habitats outside Development Focus Areas (DFAs) and outside Variance lands as designated by the Desert Renewable Energy Conservation Plan (DRECP, BLM 2016), place the gen-tie line in an Area of Critical Environmental Concern (ACEC), impact a key linkage point in desert-wide connectivity (page 5.2-12 quoting SC Wildlands 2012), and affect habitats where 182 “features were identified as potential tortoise burrows ... that had been originally excavated by desert tortoise” were located during the most recent 2023 surveys (page 5.2-33), etc.

Collectively, the SA-EIR clearly documents the poor site selection that continues to be associated with this project. During the webinar, the proponent claimed that it was obligated to situate this solar facility along the Meade-Adelanto Transmission Line as if that were the only available transmission corridor available and that other alternatives were not being pursued because they didn’t occur along this corridor. These and other factors have resulted in oppositional comments and controversy relative to desert bighorn sheep, desert tortoise, burrowing owl, Mojave fringe-toed lizard, and their habitats, air quality, visual resources, greenhouse gas emissions, battery energy storage system (BESS) fires, and impacts to hydrological resources (page 1-13), which may have been avoided had a less environmentally sensitive site been identified.

(2) It is not clear in the SA-EIR to where the energy that would be produced would be transmitted, even though we specifically asked for that information in our scoping comments of September 3, 2025. Surely, there are impaired habitats closer to the targeted communities consuming this energy that are better suited to this development than at the proposed location. But these alternative sites (as well as rooftop solar) are not analyzed in the SA-EIR, in part because they do not occur along the Meade-Adelanto Transmission Line and because they do not satisfy the proponent’s financial expectations for the project (i.e., the proponent would not benefit financially from implementing the rooftop solar alternative).

(3) Whereas we appreciate that the 2012-proposed arrays that would have occurred on the north and west side of I-15 were eliminated, there have always been relatively more tortoises on the east and southern sides of the interstate where this most recent proponent continues to propose development. When we walked the site in 2012, we found that the cobble substrates precluded most of the off-highway vehicle (OHV) traffic that would have otherwise emanated from the adjacent Razor OHV Open Area, and that the site was in near-pristine condition. According to the SA-EIR (page 5.2-102), the project would result in "...2,074 acres of permanent and temporary impacts of desert tortoise habitat," which would be avoided if a less environmentally-damaging alternative were selected on brown fields or otherwise degraded habitats devoid of tortoises. We suspect that locating the solar site adjacent to the Razor OHV Open Area will contribute to more dust on the mirrors and result in the use of more water than would be needed in more urban settings.

(4) Despite focal surveys and studies for bighorn sheep that continue to show the importance of this area to the conservation of this species, here is yet another proponent willing to ignore those studies and results and continue to propose this development at a location that has significant impacts that cannot be mitigated as per Table 1-1 on page 1-4 of the SA-EIR. The SA-EIR on page 5.2-170 concludes that "This short-term fragmentation, combined with noise and human presence, would contribute to a cumulative impact that is considered *significant and unavoidable* [*emphasis added*] for desert bighorn sheep during construction." Of course impacts are avoidable; just do not construct solar fields at this location.

Please note, on page 5.2-101, the error in the following statement, "...the desert tortoise is federal- and *state-listed* [*emphasis added*] as threatened under the ESA and California Endangered Species Act (CESA), respectively." Since July 2025, Mojave desert tortoise is now listed as Endangered by the Commission, which the DTC and DTPC believe warrants heightened protection than if the species were listed as Threatened. This error should be corrected in the Final EIR and may warrant additional analysis given the upgraded nature of the listing from Threatened to Endangered.

There is no indication in the literature cited section for biological resources (pages 5.2-271 to 5.2-280) that a CDFW 2081 incidental take permit (ITP) has been solicited, but we note on page 5.2-102 that "The ITP application provided by the applicant indicated that five protocol-level surveys for desert tortoise were performed in the proposed project area between 2009 and 2023 (261593 ITP App). A detailed description of each of the surveys can be found in the ITP application (261593 ITP App) and supporting application materials (RE 2024c)." We interpret this information to mean that an ITP application was submitted in 2024, but there is no indication if the ITP application was submitted to the CDFW or USFWS, or if an ITP was ever issued.

The SA-EIR (page 5.2-70) states that the California Energy Commission (CEC) is opting to pursue "in-lieu permitting" under the Warren-Alquist Act, but provides no more than this statement as to the analysis associated with this alternative permitting process. As such, the DTC and DTPC are unable to understand how exactly CEC is proposing to permit this project, how this alternate approach compares to the proactive protection we have come to expect from CDFW's permitting process, or if there will be future opportunities for affected interests to review and comment on this future permitting procedure. This missing information should be explained in the Final EIR, ensuring that the tortoise is analyzed as a State-listed Endangered species rather than a Threatened species and that CEC's alternative permitting approach will be as stringent and effective as that of the CDFW.

We note on page 5.2-103 that a 2016 federal biological opinion is referenced for this project. Given the substantial declines in tortoises (Allison and McLuckie 2018), 2023 surveys that document far more tortoise burrows than earlier surveys (page 5.2-102), and recent uplisting of the tortoise from Threatened to Endangered (California Fish and Game Commission 2025), we expect that the Bureau of Land Management (BLM) will need to reinitiate formal consultation with the USFWS, because the project is located on BLM-administered lands and would need their authorization. The SA-EIR (page 5.2-105) estimates that “that a maximum of 10 adult or subadult (>180 mm) and 68 juvenile or hatchling (<180 mm) desert tortoises could occur in the area,” which constitutes a California Environmental Quality Act (CEQA)-significant impact even if proposed mitigation is implemented.

Although the following explanation is given on page 5.2-68, “Take of federally listed species as defined in the ESA [endangered species act] is prohibited without incidental take authorization, which may be obtained through Section 7 consultation (between federal agencies) or a Section 10 Habitat Conservation Plan,” the SA-EIR does not clearly describe which federal permitting process would be pursued. We remind the CEC, BLM, and USFWS that there is new information on the status, trend, and threats to the tortoise including threats from utility-scale solar energy development since the issuance of the USFWS’s biological opinion on the DRECP. Please see Appendix A: Some Recent Findings on Impacts to the Mojave Desert Ecosystem and Mojave Desert Tortoises from Utility-scale Solar Projects (attached).


The reinitiation requirements in 50 Code of Federal Regulations (CFR) §402.16 explain that reinitiation of formal consultation is required where discretionary Federal agency involvement or control over the action has been retained (or is authorized by law) and if: (1) the amount or extent of incidental take is exceeded; (2) new information reveals effects of the agency action that may affect listed species or critical habitat in a manner or to an extent not considered in this opinion; (3) the agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in this opinion; or (4) a new species is listed or critical habitat designated that may be affected by the action. We contend that the second requirements has been triggered, and that the USFWS needs to reconsider its 10-year-old biological opinion because its analysis of the impacts of the taking are likely not appropriate given new information available since 2016.

The SA-EIR is not clear on how the BLM may still be involved (or not) in the proposed project or if reinitiation of formal Section 7 consultation is being sought. Alternatively, will the CEC require that a Section 10(a)(1)(B) ITP be issued by the USFWS? Please describe in detail the specific federal permitting process being pursued in the Final EIR.

We appreciate this opportunity to provide the above comments and trust they will help protect tortoises during any resulting authorized activities. Herein, we reiterate that the DTC and DTPC want to be identified as Affected Interests for this and all other projects funded, authorized, or carried out by the CEC that may affect desert tortoises, and that any subsequent environmental documentation for this project is provided to us at the contact information listed above. Additionally, we request that you notify the DTC (eac@deserttortoise.org) and DTPC (roger.dale@tortoise-tracks.org) of any future proposed projects that CEC may authorize, fund, or carry out in the range of the desert tortoise in California.

Please respond in an email that you have received this comment letter so we can be sure our concerns have been registered with the appropriate personnel and office for this Project.

Respectfully,



Edward L. LaRue, Jr., M.S.
Desert Tortoise Council, Ecosystems Advisory Committee, Chairperson



Roger Dale
Desert Tortoise Preserve Committee, Vice President

Attachment: Appendix A: Some Recent Finding on Impacts to the Mojave Desert Ecosystem and Mojave Desert Tortoises from Utility-scale Solar Projects

cc. Brian Croft, Assistant Field Supervisor, Palm Springs Fish and Wildlife Office, U.S. Fish and Wildlife Office, brian_croft@fws.gov
Steven Recinos, Environmental Scientist, Region 6, Inland Deserts Region, California Department of Fish and Wildlife, steven.recinos@wildlife.ca.gov
Joseph Stout, State Director, Bureau of Land Management, Sacramento, CA, castatedirector@blm.gov
Brandon Anderson, Acting District Manager California Desert District, Bureau of Land Management, BLM_CA_Web_CD@blm.gov
Lisa Belinky, Center for Biological Diversity, Oakland, CA, lbelenky@biologicaldiversity.org
Ileene Anderson, Center for Biological Diversity, Los Angeles, CA, IAnderson@biologicaldiversity.org

Literature Cited

- Allison L.J. and A.M. McLuckie. 2018. Population trends in Mojave desert tortoises (*Gopherus agassizii*). Herpetological Conservation and Biology. 2018 Aug 1;13(2):433-52. http://www.herpconbio.org/Volume_13/Issue_2/Allison_McLuckie_2018.pdf
- Berry, K.H., L.J. Allison, A.M. McLuckie, M. Vaughn, and R.W. Murphy. 2021. *Gopherus agassizii*. The IUCN Red List of Threatened Species 2021: e.T97246272A3150871. <https://dx.doi.org/10.2305/IUCN.UK.2021-2.RLTS.T97246272A3150871.en>
- [CDFW] California Department of Fish and Wildlife. 2024a. Status Review for Mojave Desert Tortoise (*Gopherus agassizii*) Report to the Fish and Game Commission, February 2024. <https://nrm.dfg.ca.gov/documents/ContextDocs.aspx?cat=CESA-Listing>
- [CDFW] California Department of Fish and Wildlife. 2024b. 2022-2024 News Releases. California Fish and Game Commission Holds Hybrid Meeting, April 23, 2024. <https://wildlife.ca.gov/News/Archive/california-fish-and-game-commission-holds-hybrid-meeting11>

[Commission] California Fish and Game Commission. 2025. CESA, Petitions to List Species Under the California Endangered Species Act, Finalized Petitions. <https://fgc.ca.gov/CESA#1089124-mojave-aka-agassizs-desert-tortoise-2025>
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=232827&inline>

Defenders of Wildlife, Desert Tortoise Preserve Committee, and Desert Tortoise Council. 2020. A Petition to the State of California Fish And Game Commission to move the Mojave desert tortoise from listed as threatened to endangered. Formal petition submitted 11 March 2020. https://defenders.org/sites/default/files/2020-03/Desert%20Tortoise%20Petition%203_20_2020%20Final_0.pdf

[DTC] Desert Tortoise Council. 2012. Public scoping comments on the proposed Soda Mountain Solar project (CACA 49584). Comment letter submitted to Mr. Jeffrey Childers of the BLM on 12/13/2012. Ridgecrest, CA. Pages A-1 through A-6.

[DTC] Desert Tortoise Council. 2014. Formal comments on the Draft Environmental Impact Statement for Soda Mountain Solar project (CACA 49584). Comment letter submitted to Mr. Jeffrey Childers of the BLM on 3/1/2014. Ridgecrest, CA. Pages A-7 through A-13.

[DTC] Desert Tortoise Council. 2016. RE: Issuance of a well permit to proponents for Soda Mountain Solar Project. Comment letter submitted to Supervisors James Ramos and Robert Lovingood, San Bernardino, CA.

[DTC] Desert Tortoise Council. 2023. Soda Mountain Solar Project, San Bernardino County, California – Notice of Preparation (NOP) of a Draft Environmental Impact Report. Comment letter submitted to Dr. Shankar Sharma of the CDFW on 2/16/2023. Acton, CA. Pages A-15 to A-68.

Dear CEC,

It is apparent from reading the SA-EIR that the writers were not familiar with the information included in this appendix. As such, we believe that the Final EIR needs to be amended. Otherwise, CEC has not relied on the latest, best available science to complete its environmental review.

Ed LaRue

Appendix A: Some Recent Findings on Impacts to the Mojave Desert Ecosystem and Mojave Desert Tortoises from Utility-scale Solar Projects

Surface Hydrology and Impacts to Soil Moisture and Vegetation:

Devitt et al. (2022) reported that “[c]onstruction of roads, transmission lines and utility scale solar photovoltaic facilities can decouple up-gradient washes from down-gradient locations.” They reported that the decoupling of the wash system at a solar site “led to a significant decline in soil moisture, canopy level NDVI [normalized difference vegetation index] values and mid-day leaf xylem water potentials.” Over time especially combined with climate change, this impact may result in reduced plant reproduction, growth, and survival for plants down-gradient of the decoupling sites including plants not on the project site.

When plants die, they release carbon from their roots, stems, and leaves into the atmosphere and contribute to climate change (Devitt et al. 2022). Given the current climate change conditions, there is an increasing need for carbon sequestration, not carbon release, therefore, an increasing need to, as a minimum, maintain native plants and not disrupt the surface hydrology of the project site. These indirect impacts should be analyzed in the EIR with respect to impacts on vegetation, wildlife and special status species including the tortoise.

Heat Island Effects to Vegetation and Soils:

Utility-scale PV facilities have significant impacts on local air and ground temperatures. Utility-scale PV solar projects produce increased heat. PV panels create a black barrier between the ground and the atmosphere, which alters heat flux dynamics by restricting movement of warm air up into the atmosphere similar to a greenhouse effect (Barron-Gafford et al. 2016). PV solar panels raise ambient air temperatures by as much as 3-4 degrees C in the summer, creating a “Photovoltaic Heat Island Effect.” A PV “heat island” effect refers to the temperatures in and around PV solar facilities increasing from the ambient temperature due to replacement of native land cover with solar panels that absorb heat. This is similar to the “urban heat island” effect, where native cover is replaced with pavement and concrete buildings.

PV solar panels convert solar radiation into heat, which can alter the air flow, energy flux dynamics, and temperatures near the panels (Fthenakis and Yu, 2013; Barron-Gafford et al, 2016). Soils, vegetation, and wildlife may be affected by such changes and increases in temperature in and around utility-scale solar facilities.

Fthenakis and Yu (2013) found that annual average air temperature in the center of a solar project at heights approximately 2.5 meters (8 feet) above the ground can reach up to 1.9 degrees C (3.5 degrees F) above ambient temperature. This thermal energy dissipates and reaches ambient temperature at 5-18 meters (16-60 feet) above the ground. This same study found a prompt dissipation of thermal energy and decrease to ambient temperatures around the PV panels at 300 meters (984 feet) away (horizontal distance) from the perimeter of the solar farm and that access roads between solar fields allowed for substantial cooling.

Devitt et al. (2022) reported that large photovoltaic facilities similar to the proposed Purple Sage Solar Project raised the air and soil temperatures not only on the project site but significant heat was moving from the solar facility into the plant community, especially in the first 200–400 m (656 to 1,312 feet) off the project site. This rise in temperature also impacts the availability of soil moisture and the ability of burrowing animals such as the tortoise in nearby areas to reduce their body temperatures at night to conserve energy and moisture. The impacts of elevated soil and air temperatures to areas adjacent to the proposed project should be analyzed in the revised DEIS including impacts to the survival, growth, and recruitment of native vegetation if this area is to be managed for wildlife use including use by tortoises.

Photovoltaic facilities can also alter the energy balance by generating heat (Broadbent et al. 2019). Nighttime temperatures over photovoltaic plants are regularly 3–4 degrees C warmer than over wildlands, representing a heat island effect (Devitt et al 2022). As the warmer air was displaced down gradient, the temperature front advanced into the creosote—bursage plant community with values 5 to 8 degrees C warmer at the 1-meter height.

Similarly, Broadbent et al. (2019) found increased temperatures during the day, with an average 1.3 degrees C increase in air temperature in the solar field at a height of 1.5 meters (5 feet). The nighttime soil temperatures at the solar site were warmer than the reference site. The study demonstrated that shading from solar panels causes warmer soil temperatures at night.

Barron-Gafford et al. (2016) monitored three study sites (natural desert ecosystem, traditional built environment (parking lot with commercial buildings), and PV power plant), measuring air temperature at 2.5 meters (8 feet) off the ground. The average annual air temperature was greater at the PV power plant, increasing 2.5 degrees C during the day. Contrary to other studies, a delayed cooling of ambient temperatures was detected in the evenings, with average annual midnight temperatures increasing 3.5 degrees C, compared with the natural desert ecosystem. The authors hypothesized that by removing vegetation, heat-dissipating transpiration from vegetation is decreased, and compared to natural systems, the greater amount of exposed ground surfaces absorbs more solar radiation during the day, which may increase soil temperatures (Barron-Gafford et al, 2016). During the night, stored heat is reradiated, where warming under the panels may be due to the heat trapping of reradiated heat flux (Barron-Gafford et al, 2016).

Devitt (2022) evaluated a large solar facility in the Mojave Desert and the effect it had on adjacent down-gradient creosote communities. The study monitored changes in soil and plant water status over a 900-meter transect where a built service road resulted in decoupling of up-gradient washes from down-gradient locations leading to a decline in soil water in storage. Similar to other studies, air temperatures were significantly warmer near the solar facility compared to a reference point. Consistent with Barron-Gafford (2016), night temperatures were found to be higher closest to the solar facility.

The results of these studies indicate that PV solar projects increase air temperatures in the areas adjacent to the solar field – in some cases by more than 1,000 feet, change soil temperatures, and reduce soil moisture.

Notably, these studies were performed on solar sites that were graded and unvegetated. Barron-Gafford postulated that mitigation of the PV heat island effect would be achieved in part through targeted revegetation, which could ease ecosystem degradation associated with development of utility scale solar projects (Barron-Gafford et al, 2016). Regarding nighttime temperatures, the study suggested that if the panels are mounted on a tracking system, the panels could be situated in a perpendicular position relative to the ground at night, allowing longwave radiation and trapped heat to escape to the sky, reducing the heat displacement into adjacent plant communities during the early morning hours.

Heat Island Effects to Tortoises and Other Reptiles/Wildlife:

How would these heat island effects affect the tortoise? Slade (2023) found that solar arrays significantly altered the surface-level thermal environment for tortoises and other reptilian species. Beside increased daytime temperatures when compared to undisturbed desert areas, Slade (2023) reported that solar arrays create a shade-warming effect; artificial shade under solar panels have significantly greater temperatures than natural shade. In addition, both fixed, shorter and the taller, sun-tracking panels of solar arrays exhibited warmer nighttime air temperatures than undisturbed sites (Slade 2023). The shade-warming effect from solar panels was most pronounced during the hottest, most thermally challenging months for reptiles.

These altered thermal environments could have unintended physiological and behavioral consequences for ectotherms such as the tortoise, given the tortoise's innate dependence on appropriate environmental temperatures for physiological function and activity. These negative consequences include extended exposure times of clutches of eggs at temperatures above thermal maximum for embryo development resulting in reproductive failure, an upward shift in their resting body temperatures that increase metabolic expenditure and water loss, negatively affecting energy balance (Nagy and Medica 1986, Sowell 2001) and therefore survival, among other physiological and behavioral concerns. Tortoises are already living on the upper edge of their thermal limits and could be pushed closer toward extinction by an additional heating effect created by utility-scale solar arrays (Sinervo 2014). Thus, allowing federally protected species such as the tortoise access to certain areas inside solar arrays post-construction in the hopes that they can persist and move through their native home ranges beneath a newly-installed canopy of solar panels appears to be problematic based on the results of Slade's (2023) research. Until demonstrated otherwise, this treatment of solar projects as providing possible value/mitigation to the tortoise for movement and other life history requirements should be considered experimental and not mitigation for the impacts to the tortoise and tortoise habitat.

Desert tortoises are herbivores with low and narrow thermal tolerance ranges relative to other desert reptiles (Berry et al. 2021, Zimmerman et al. 1994). As their environment warms and drought periods increase, their ability to meet their increasing energetic requirements may be thwarted by decreased periods of potential activity time (e.g., reduced time for foraging) and lack of plant food and water availability, pushing them to the brink of their physiological limits (Lovich and Ennen 2011). Under current climate change scenarios without a reduction in carbon dioxide emissions, models predict that Mojave desert tortoises could approach extinction by 2080. When a 0.4 to 0.75 degrees C increase in air temperatures created by a photovoltaic heat island is included, these models indicate an even more rapid decline (Slade 2023).

In addition, Slade (2023) reported that “species richness is lowest in a solar array and increases with distance into natural desert habitat” and “solar arrays decrease vertebrate species richness on their edge habitats.” Thus “solar arrays have a deleterious effect on species richness, with extremely few species detected compared to adjacent and control habitats.”

Similar changes to the below-ground thermal environment at a solar array could be similarly problematic to the tortoise and other wildlife species. Slade (2023) reported that soil temperatures directly influence the body temperatures of burrowing reptiles (e.g., desert tortoise.). Any increase in underground temperatures could heighten water loss and resting metabolic rates for dormant reptiles and compromise their fitness and survival. This impact would be more severe for hatchling and juvenile tortoises than adults because of their small body size and larger surface to volume ratio. Thus, recruitment of young tortoises into the population would be adversely affected.

Desert tortoises, like most other turtles, exhibit temperature-dependent sex determination. Soil temperatures directly influence the incubation temperatures of tortoise nests, which affect hatchling survival and sex ratios (Slade 2023). Proper soil temperatures during incubation are critical to the survival of tortoises. With warmer ambient and soil temperatures from solar arrays, eggs laid in nests located in heat island areas of solar arrays would likely result in more hatchling female tortoises and fewer hatchling male tortoises. In addition, long-term exposure to higher temperatures results in deformities and high levels of clutch mortality (Spotila et al. 1994). Climate change would exacerbate this heat island impact on clutch survival and sex determination. Because desert tortoises depend on the suitability and reliability of their thermal environment, this makes them extremely vulnerable to temperature increases imposed by climate change, a photovoltaic heat island, or both (Slade 2023).

Parandhaman (2023) reported that temperature, precipitation, and soil conditions are very important factors in determining habitat suitability for the desert tortoise

Karban et al. (2024) described wildlife responses to utility-scale solar energy disturbance with three response strategies: avoid, tolerate, and exploit. Avoidant species avoid the disturbance, partially or entirely, to forestall negative effects of utility-scale solar energy disturbance. These species are not persistent in solar energy areas and decline if disturbance cannot be avoided. Avoidant wildlife typically has narrow or inflexible ecological niches that make them vulnerable to disturbance, such as specific habitat requirements and specialized diets. Karban classified tortoises as disturbance avoiders, possessing a number of traits (e.g., diet of diverse forb species, susceptibility to road mortality) that make them vulnerable to disturbance (Karban et al. 2024).

Based on these studies, impacts to vegetation, soils, and tortoises at solar facilities related to the PV heat island effect include increased air temperatures in the vicinity of the solar field during the day and at night as well as higher soil temperatures. Increased temperatures would impact the species composition of vegetation and wildlife at and in the vicinity of the solar facility, where temperatures could be too high and soil moisture too low for certain plant and animal species, including the tortoise to persist. Wildlife species would be displaced as they are forced to vacate the area of increased temperatures. Changes in surface hydrology at and down-gradient from features of utility scale PV solar projects may reduce water availability for vegetation communities, and increases or decreases in soil temperatures could affect persistence of vegetation and habitat suitability for burrowing wildlife forcing some species to avoid solar facilities.

The heat island effects should be analyzed with respect to impacts to other special status species, such as desert bighorn sheep, and their habitats needed for life requisites including cover from predators, forage, and connectivity habitat.

Translocation of Tortoises:

Mack and Berry (2023) monitored translocated tortoise for 10 years. They reported that 17.7 percent of the tortoises survived, 65.8 percent died, 15.2 percent were missing, and 1.3 percent were removed from the study because they returned to the original site. Mortality was high during the first three years – more than 50 percent of the tortoises died primarily from predation. (A similar result occurred from translocation of tortoise from the Yellow Pine Solar Project.) Thereafter, mortality declined but remained high. Although the translocation efforts by the Marine Corps at Twentynine Palms considered some of these factors, tortoise mortality from predation was high (Henen 2024). To minimize mortality to small tortoises, these animals have been brought into headstart facilities. The Marine Corps continues to monitor the translocated tortoises.

In addition, Mulder (2017) studied translocated tortoises during the first four years and learned that male translocated tortoises did not produce offspring with resident or translocated female tortoises. This absence of successful mating at the translocation site is concerning, because it means the genes from the male translocated tortoises were not added to the population at the translocation site. Thus, the perceived benefits of genetic diversity from translocation are not fully realized.

The “success” of translocation depends on a myriad of factors including the absence of drought, the ability of the translocation area to support additional tortoises (e.g., availability of native nutritious forage (Drake et al. 2016, etc.), social interactions between resident and translocated tortoises (Sullivan, 2015, Mulder et al. 2017, etc.), the distance translocated tortoises are moved (Mack and Berry 2023), effective management of translocation lands to eliminate human-caused threats (Berry et al. 2014, Hromada et al. 2023), the time of year tortoises are moved (Mack and Berry 2023), their physiological/hydration state (Field et al. 2018, USFWS 2019), and elevated predation (Mack and Berry 2023, Henen 2024, etc.), Translocation sites should not be managed for multiple use or any use that does not provide for the conservation of the tortoise/tortoise habitat (Berry et al. 2014).

As a minimum, a translocation plan for the tortoise should address the following questions and provide effective solutions:

- where is the translocation site and what are the adjacent land ownership and uses (please include a map)
- how far is the translocation site from the project area (translocation sites located close to the site from which tortoises are removed appear to contribute to higher tortoise survival than those that are farther away (Mack and Berry 2023))
- who will manage the translocation site
- how will it be managed because it is a mitigation site and no longer a multiple use site
- will tortoises be released in years with less than average rainfall
- what time of year will tortoises be released
- what are the results of tortoise surveys at the translocation site and of native vegetation surveys including annual vegetation at the translocation site

- are non-native invasive annual plants species present and if so, are they abundant
- what other activities will be allowed to occur at the translocation site and adjacent areas (e.g., mining, grazing, OHV access, utility access, other activities that result in surface disturbance)
- how will management of the translocation site, a mitigation site, be implemented and effectively enforced
- how and when will monitoring occur (monitoring schedule) and what environmental parameters besides tortoises will be monitored
- how long will tortoises and environmental parameters be monitored – monitoring should occur for multiple years
- when monitoring indicates a change in management is needed, when will this change occur (adaptive management)
- who will fund the translocation plan and for how long
- will the translocation plan include management of tortoise predators
- how will small tortoises be managed and monitored

We contend the results of these studies and the inability of government agencies to secure mitigation lands that are properly managed for the long-term management of translocation sites indicate that translocation of Mojave desert tortoises to date has not been an effective, successful mitigation method. Thus, avoidance of impacts to tortoises/tortoise habitat should be the preferred solution when projects that may result in the loss of tortoises are proposed. Translocation should be a last mitigation choice, not the first one.

Rather than approving development projects in tortoise habitat, the CEC should approve projects located outside of occupied tortoise habitat, critical habitat, and wildlife habitat needed for connectivity/movement in response to climate change.

If translocation for the tortoise is implemented, we strongly recommends that the Desert Tortoise Recovery Office (DTRO) have final review and approval of the translocation plan. The DTRO contains the biologists that are the species lead for the tortoise. The DTRO is the office that oversees the health assessments, develops translocation guidance for the tortoise, and analyzes its effectiveness to contribute to recovery. The Southern Nevada Fish and Wildlife Office focuses on implementing the regulatory aspects of the FESA, while the DTRO has traditionally focused on the science of what is needed for survival and recovery. Consequently, we recommend that the DTRO review and approve this Translocation Plan for the tortoise and how it is implemented.

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To: Energy - STEP Siting [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=14e6ac2919ec428bb3378e30ce9a58e9-Energy - ST]; Hochschild, Chair@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2229043b4d0c42bf9201290a856f88b0-Energy - Ch]; Energy - Commissioner Gallardo [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a6ce5419990f4d1ead2783524eb6b23f-Energy - Co]
CC: Nicholas Jensen [njensen@cnps.org]
Subject: Soda Mountain Solar S/DEIR - CNPS Comments
Attachments: Soda Mountain Solar SA-DEIR - CNPS Comments.pdf

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Dear Ms. Worrall, Chair Hochschild, and Commissioner Gallardo:

Please see the attached comments regarding the Soda Mountain Solar Project Staff Assessment/Draft Environmental Impact Report submitted on behalf of the California Native Plant Society. Please feel free to contact me if you have any questions regarding our comments. Thank you for your consideration of our comments.

Sincerely,
Brendan Wilce

Brendan Wilce (He/Him)
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February 27, 2026

California Energy Commission
Attn: Lisa Worrall, Project Manager
715 P Street
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*Submitted via email to: STEPsiting@energy.ca.gov, Chair.Hochschild@energy.ca.gov,
CommissionerGallardo@energy.ca.gov*

Submitted via the web to: <https://efiling.energy.ca.gov/>

**Re: California Native Plant Society Comments on Soda Mountain Solar Project Staff
Assesment/Draft Environmental Impact Report**

Dear Ms. Worrall, Chair Hochschild, and Commissioner Gallardo:

Thank you for the opportunity to comment on the Soda Mountain Solar Project Staff Assessment (SA)/Draft Environmental Impact Report (DEIR). The following comments are submitted on behalf of the California Native Plant Society (CNPS), a non-profit environmental organization with over 13,000 members in 35 Chapters across California and Baja California, Mexico. CNPS's mission is to protect California's native plants and their natural habitats, today and into the future, through science, education, stewardship, gardening, and advocacy. We work closely with decision-makers, scientists, and local planners to advocate for well-informed policies, regulations, and land management practices.

Opposition to Project Siting

While our organization is in strong support of the development of renewable energy, where we place renewable energy projects and how we meet our energy needs are critical to the conservation of remaining intact habitats, preservation of biodiversity, and achieving California's 30x30 goals. The proposed Soda Mountain Solar Project is not compatible with these goals.

This project is not sited within a designated development focus area as designated by the Desert Renewable Energy Conservation Plan (DRECP), a plan that has provided access to huge swaths of lower conflict lands for solar development. Both the National Park Service and the California Department of Fish and Wildlife (CDFW) have cited concerns with the impacts to desert bighorn sheep, a CDFW fully protected species, that would result from this development. The project would block access to the legislatively required, and taxpayer funded, wildlife crossing planned to improve habitat connectivity for desert bighorn sheep. This project is now being brought forward by its fourth owner after failing to advance under previous lead agencies.

SA/DEIR Comments

Project Alternatives

We would strongly encourage the CEC to disclose the alternative sites that were stated to be considered but dismissed, as is reported in the SA/DEIR. There are many areas within DRECP Development Focus Area that would be more suitable for large scale solar development than this site. An analysis of an alternative to repurpose the Ivanpah Solar Generation Site should also be considered. This information and additional alternatives analysis should be circulated for public review in a supplemental SA/DEIR prior to the development of the FSA/FEIR.

MM BIO-6

The development of the Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP) should not be deferred until after project approval. There is sufficient information in the PSA/DEIR to guide the development of the BRMIMP as required by § 15126.4 (a)(1)(B) of CEQA which states that "mitigation measures shall not be deferred until some future time," unless "it is impractical or infeasible to include those details during the project's environmental review." Additionally, the BRMIMP must be fully enforceable through permit conditions, agreements, or other legally binding instruments as required by §15126.4(a)(2) of CEQA and must include explicit performance standards and monitoring requirements to define and evaluate when these standards are being met. Provisions to require adaptive management and additional monitoring in the event that standards are not being met should be incorporated into the BRMIMP. A supplemental SA/DEIR including the BRMIMP should be circulated for full public review and comment prior to the development of the FSA/FEIR.

MM BIO-7

This mitigation measure should indicate that avoidance of botanical resources should be prioritized over any form of compensatory mitigation.

MM BIO-8

The development of the Vegetation Management Plan (VMP) should not be deferred until after project approval. There is sufficient information in the SA/DEIR to guide the development of the VMP as required by § 15126.4 (a)(1)(B) of CEQA which states that "mitigation measures shall not be deferred until some future time," unless "it is impractical or infeasible to include those details during the project's environmental review." Additionally, the VMP must be fully enforceable through permit conditions, agreements, or other legally binding instruments as required by §15126.4(a)(2) of CEQA and must include explicit performance standards and monitoring requirements to define and evaluate when these standards are being met. Provisions to require adaptive management and additional monitoring in the event that standards are not being met should be incorporated into the VMP. The VMP should explicitly require the use of locally sourced and genetically appropriate seed or cuttings, preferably sourced from material within the project site. All mentions of the allowance for the Compliance Project Manager (CPM) to approve the use of material from other sources should be removed from this mitigation measure. MM BIO-8 should include language indicating that collecting seed or cutting material

to be bulked by the California Botanic Garden, or by another native plant nursery in coordination with the California Botanic Garden, may be needed to ensure the required quantities of suitable propagules or transplants. Salvaged topsoil should be stored in a manner to prevent contamination with non-native species and to be kept dry to prevent the germination of the seedbank contained prior to redistribution. A supplemental SA/DEIR including the VMP should be circulated for full public review and comment prior to the development of the FSA/FEIR.

MM BIO-9

The development of the Integrated Weed Management Plan (IWMP) should not be deferred until after project approval given the significant information regarding invasive species present on the project site and the potential for project activities to introduce invasive species and to facilitate the proliferation of invasive species, as required by § 15126.4 (a)(1)(B) of CEQA which states that "mitigation measures shall not be deferred until some future time," unless "it is impractical or infeasible to include those details during the project's environmental review." Additionally, the IWMP must be fully enforceable through permit conditions, agreements, or other legally binding instruments as required by §15126.4(a)(2) of CEQA and must include explicit performance standards and monitoring requirements to define and evaluate when these standards are being met. Provisions to require adaptive management and additional monitoring in the event that standards are not being met should be incorporated into the IWMP. A supplemental SA/DEIR including the IWMP should be circulated for full public review and comment prior to the development of the FSA/FEIR.

MM BIO-12

This mitigation measure should clearly define "feasible" regarding avoidance of special status plant species. The minor modification or reduction of the project footprint or placement of project facilities that would allow for the majority of project objectives to be achieved, or minor changes to the alignment of access routes, should be considered as feasible when considering the avoidance of sensitive resources. Avoidance of botanical resources should be prioritized over any form of compensatory mitigation. BIO-12 states that CRPR 1 or 2 ranked species would receive a 3:1 mitigation ratio and in the next line state that these species would receive a 2:1 mitigation ratio, this should be amended to clarify that the 3:1 mitigation ratio would apply to "any state or federally listed plants and CRPR 1 or 2 ranked species" and that a mitigation ratio of 2:1 would be applied to "CRPR 3 or 4 ranked species." The development of a relocation plan for special status plants should not be deferred until a point at which "salvage and relocation is not believed to be feasible for special status plants." This relocation plan should be developed in coordination with California Botanic Garden, BLM, or another qualified entity at the point that it is determined that the relocation of a special status species is deemed necessary and this plan should help to guide decisions whether the relocation of the species in question is feasible, or if the development of a propagation and reintroduction plan is necessary. The performance standards and term of mitigation are not clearly defined in this mitigation measure to a level to achieve enforceability as required by § 15126.4 (a)(2) of CEQA. This mitigation measures must include explicit performance standards, as well as a mechanism to ensure that these standards are achieved, and contingencies for additional mitigation and adaptive management.

MM BIO-13

The Vegetation Resources Management Plan (VRMP) should be developed and circulated in a revised Staff Assessment (DEIR) for public review prior to project approval. The VRMP is essential to the success of mitigation measures BIO-13. Given that there is sufficient information regarding the anticipated impacts of the project to develop the VRMP the deferral of developing this plan is in violation of section 15126.4 (a)(1)(b) of CEQA which only allows for specific details to “be developed after project approval when it is impractical or infeasible to include those details during the project’s environmental review.” This mitigation measure should prioritize the avoidance of botanical resources over any form of compensatory mitigation. These measures also lack the required enforceability required in section 15126 (a)(2) of CEQA. This mitigation measures must include a fully developed VRMP as well as explicit performance standards and a full description of mechanisms to ensure that these standards are achieved, contingencies for additional mitigation and adaptive management, and a guarantee for the funding of mitigation, monitoring, and enforcement. A supplemental SA/DEIR including the VRMP should be circulated for full public review and comment prior to the development of the FSA/FEIR.

Maintenance and Monitoring

We strongly recommend the following requirements regarding the development of mitigation measures, the term of mitigation, and the ongoing monitoring of performance standards throughout the life of the project be incorporated into MM BIO-6, MM BIO-8, MM BIO-9, MM BIO-12 and BIO-13:

- Avoidance of impacts to special status species and sensitive vegetation communities should be prioritized over any form of restoration or compensatory mitigation.
- Species-specific restoration plans should be developed for all special status plants with the potential to be impacted, including detailed criteria for determining the success of restoration or compensatory mitigation.
- Restoration plans should be developed for all sensitive plant communities with the potential to be impacted, including detailed criteria for determining the success of restoration or compensatory mitigation.
- Areas identified as potential recipient sites must be surveyed following CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (Protocols) to ensure that compensatory mitigation sites would be suitable for target species or vegetation communities and that mitigation efforts would not cause harmful impacts to existing botanical resources. Low conflict areas that have been degraded by previous land uses should be prioritized for restoration, leaving intact natural habitat undisturbed by restoration efforts.
- While onsite mitigation is preferred, if contiguous acreage to achieve mitigation needs is not present on the project site restoration activities may be implemented offsite.
- Maintenance and monitoring of compensatory mitigation and restoration sites should occur each year for the first five years of the mitigation term. After five years of maintenance, yearly monitoring of the site should demonstrate a self-sustaining area of occupation and population numbers with no management actions for years 6-8.
- If monitoring shows stable populations after three years (following the initial 5-year period of annual monitoring) with no maintenance, the populations should be monitored

every two years throughout the life of the project.

- If the populations do not demonstrate stability/adherence to species specific success criteria after the initial five year maintenance and monitoring period, after three years without maintenance, or if subsequent monitoring shows loss or decline of populations, as determined by the required mitigation ratio and/or performance standards for compensatory mitigation and/or restoration, then yearly maintenance and monitoring shall be resumed for a five year period, again requiring that yearly monitoring show self-sustaining populations for three years post maintenance before returning to a two year monitoring cycle.

In conclusion, please develop a supplemental SA/DEIR to address the siting issues outlined above and to incorporate the listed recommendations to improve the mitigation measures for botanical resources. Thank you for the opportunity to comment on this project and please contact me if you have any questions.

Sincerely,

Brendan Wilce
Conservation Program Coordinator
California Native Plant Society
bwilce@cnps.org

From: Chang, Kaycee@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DD3D2FC8670840BDA4ACDC455903E787-CHANG, KAYC]
Sent: 1/5/2026 8:21:05 PM
To: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Gallardo, Noemi@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6d80af906f4f4846958a22a1fbfc0795-Gallardo, N]; Cochran, Susan@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=32a787d6508b4f1c83e7e27a70ad65e6-9e8a3044-19]; Cabrera, Crystal@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ed6e32a127144ccfa19a6f4347765a9e-00a33618-ff]; Ponce, Mariah@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc5faa5d564c4cf3a2f49468b736b6c2-b2346f64-e7]; Black, Devin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c6ec9f417a6e448aae52465b9f719b5d-ea9475b4-16]; Shepard, Stacey@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cfa8945427b845179404d93680ed9544-d98b3393-81]; Young, Ryan@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bed14a598c3b476d8cd993f69f19774d-b1687c48-11]; Lao, Fabi@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=48629cc6830a4ce48cb939fbfc974d04-857b2058-0c]; Bohan, Drew@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7dd07a25fbc49b0bbb219cc3b788983-Bohan, Drew]; Hochschild, David@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8ebbe6949d3a425ea7bd5f56679bdefe-Hochschild,]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Grey, Caroline@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f042d554b342440bbf71adbd8a09c43d-a1acb01a-3a]; Qaqundah, Jimmy@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7da5ec0923de49488685fdaa76c71e51-Qaqundah, J]; Chris Huntley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=018948a34a3149c4a3833144594ae8b3-ff2eee5c-df]; Jamison Miner [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e9a371186e0e402a994145a67d6e7684-546eb26e-f8]; Vorters, Dian@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2c5604e712a74c029e412542e0db72ac-Vorters, Di]; Galer, Regina@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b683b15af7854f2198bc9a2f424ed7a1-b29c4026-02]; Fooks, Brett@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=870df74143964b71ada0039bf13c5a9a-Fooks, Bret]; Hughes, Joseph@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7dd5e80572b644209e9607ba7bdc630-Hughes, Jos]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Crisp, Ann@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b89c4de7ece742679d19e1e3ee713dc2-Crisp, Ann@]; Khoshmashrab, Shahab@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=debfeb665b7a45629f72eae824bce58-Khoshmashra]; Qian, Wenjun@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4421be8df5f40ec851d73affcbff913-Qian, Wenju]; Roark, Gabriel@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ed87ff1e22cd49f3aaff644c82538d46-Roark, Gabr]; Salyphone, Kenneth@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f08aaa91182c441ea86fea05a2a09689-Salyphone,]; Shahi, Hurshbir@Energy

[/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b9e9678d3d4746b19d23b00bf9066eca-c691b5be-4a]; Luo, Yiming@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f5df6732dbcf4fd3a7bc7639e421be64-d849b685-c5]; Longman, Renee@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=56333a9acba74875b8c0175b8bea5d52-77429d54-8c]; Veerkamp, Eric@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a16598e8714e422fb3216b7b05602c48-Veerkamp, E]; Jahani, Ali@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f8f445ffe13c487f984c7faa81a70101-d55ecce6-49]; Haws, Marichka@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=952e0b50c8ae422588958c273050b0b0-Haws, Maric]; Energy - IT Meeting Support
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3c8324a8f963460a85030d7b11e24101-Energy - IT]; Kellison-Miller, Lila@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b7f8d3143d394707a4e8f2354caf6244-b8f46ee2-22]; Keenan, Grace@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=900e20ed5c9f4d578ef515167dea57fb-f37bb591-f6]
CC: Babula, Jared@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6cf386251c7a47f697f411cee0910882-Babula, Jar]; House, Rosemary@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3fd09f7d0d9e4bc69746863233e8ffdf-3929d70b-14]; Lukanich, Kimberly@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3f1a946e58c54794950425a4010d35a4-e94335c9-4a]; Sandoval-Moreno, Victoria@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c435065cd74a4e2a8162523065d8b11a-Sandoval-Mo]; Rodriguez, Sally@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=436499a85cb14d80bd04cda176e40a85-5f828a60-96]; Fleming, Susan@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5462e0952e9644f0b30d7dde2a34c85a-Fleming, Su]; Anderson, Hilarie@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0986bc201f7d4e03b7399ee3051c52b3-Anderson, H]; Peters, Kris@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59b08222ec754724a989130629229fed-Peters, Kri]; Giorgi, Erika@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d171e5d706e34c26ad9d13c230f2349f-1324b266-6e]; Paul Miller
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4d4ce365f8bd442a8cb7d479381e2476-8906af8e-0e]; Daniel Jones
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=352cfed2f4d849749d3d8f98a9563279-082cef18-97]; Record, Jacquelyn@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=80a752975c1d44efbd17fb602595a1e7-Leyva, Jacq]; Ding, Yifan@Energy
 [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=49ee78637b0648578196965a7385b6f2-6d1c78d5-11]

Subject: Soda Mountain Solar Project Staff Assessment Meeting (ZOOM)
Attachments: TN268294_20260123T130049_Notice of Soda Mountain Solar Project CEC Staff Assessment Public Meeting F.pdf
Location: <https://energy.zoom.us/j/82770156561?pwd=h3hpjNVbku8wXtUSkq9q7ojc7QvaQa.1>; Zoom and in-person at Holiday Inn Express Barstow
Start: 2/5/2026 9:00:00 PM
End: 2/6/2026 1:00:00 AM
Show Time As: Tentative
Recurrence: (none)
Required Attendees: Gallardo, Noemi@Energy; Cochran, Susan@Energy; Cabrera, Crystal@Energy; Ponce, Mariah@Energy; Black, Devin@Energy; Shepard, Stacey@Energy; Young, Ryan@Energy; Lao, Fabi@Energy; Bohan, Drew@Energy; Hochschild, David@Energy; Worrall, Lisa@Energy; Grey, Caroline@Energy; Qaqundah, Jimmy@Energy; Chris Huntley; Jamison Miner; Vorters, Dian@Energy; Galer, Regina@Energy; Fooks, Brett@Energy; Hughes,

Joseph@Energy; Knight, Eric@Energy; Abulaban, Abdel-Karim@Energy; Crisp, Ann@Energy; Khoshmashrab, Shahab@Energy; Qian, Wenjun@Energy; Roark, Gabriel@Energy; Salyphone, Kenneth@Energy; Shahi, Hurshbir@Energy; Luo, Yiming@Energy; Longman, Renee@Energy; Veerkamp, Eric@Energy; Jahani, Ali@Energy; Haws, Marichka@Energy; Energy - IT Meeting Support; Kellison-Miller, Lila@Energy; Keenan, Grace@Energy
Optional Attendees: Babula, Jared@Energy; House, Rosemary@Energy; Lukanich, Kimberly@Energy; Sandoval-Moreno, Victoria@Energy; Rodriguez, Sally@Energy; Fleming, Susan@Energy; Anderson, Hilarie@Energy; Peters, Kris@Energy; Giorgi, Erika@Energy; Paul Miller; Daniel Jones; Record, Jacquelyn@Energy; Ding, Yifan@Energy

Update 1/29: added event webpage, meeting notice, and Zoom link

Hybrid Soda Mountain Solar Project Staff Assessment Meeting
In person at Holiday Inn Express (2700 Lenwood Road Barstow, CA 92311)
Remote access via Zoom
1:00 PM to 5:00 PM

Soda Mountain Solar Project CEC Staff Assessment Public Meeting

Remote participants may join via Zoom by internet or phone.

- **To join via Zoom.** Click on <https://energy.zoom.us/j/82770156561?pwd=h3hpjNVbku8wXtUSkq9q7ojc7QvaQa.1> or login in at <https://zoom.us/> and enter the Webinar ID **827 7015 6561** and passcode **350361** and follow all prompts.
- **To join by telephone.** Call (669) 219-2599. When prompted, enter the Webinar ID **827 7015 656** and passcode **350361**.

Please contact the project manager, Lisa Worrall, if you have any questions. Thank you!

From: Microsoft Power Automate [flow-noreply@microsoft.com]
Sent: 9/26/2025 11:17:50 PM
To: Bohan, Drew@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7dd07a25fcbc49b0bbb219cc3b788983-Bohan, Drew]
Subject: DB Approval Request - Request Name: Post Scoping Data Requests for Soda Mountain Solar Project (24-OPT-03) in Response to Scoping Comments .

<!--[if gte (gte mso 9)|(IE)]> <![endif]-->

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Power Automate

DB Approval Request - Request Name: Post Scoping Data Requests for Soda Mountain Solar Project (24-OPT-03) in Response to Scoping Comments .

Requested for Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

- Details of the request: [Click here to see details of the request.](#)

WL

[Click here to see the document\(s\).](#)

Date Created: Friday, September 26, 2025 11:17 PM GMT

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Microsoft Corporation, One Microsoft Way, Redmond, WA 98052



From: Microsoft Power Automate [flow-noreply@microsoft.com]
Sent: 11/3/2025 8:55:42 PM
To: Bohan, Drew@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7dd07a25fcbc49b0bbb219cc3b788983-Bohan, Drew]
Subject: DB Approval Request - Request Name: Soda Mountain Solar (Opt-In Project) - Appendix P.

<!--[if gte (gte mso 9)|(IE)]> <![endif]-->

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Power Automate

DB Approval Request - Request Name: Soda Mountain Solar (Opt-In Project) - Appendix P.

Requested for Brewer, Marianna@Energy <Marianna.Brewer@Energy.ca.gov>

- Details of the request: [Click here to see details of the request.](#)

BM

[Click here to see the document\(s\).](#)

Date Created: Monday, November 3, 2025 8:55 PM GMT

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Microsoft Corporation, One Microsoft Way, Redmond, WA 98052



From: Steinert, Tiffany@Waterboards [Tiffany.Steinert@Waterboards.ca.gov]
Sent: 3/4/2026 8:01:57 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
CC: Guerra, Christina@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3c08929c117e4da5bfb45f48fa749c0a-Waterboards]; Zimmerman, Jan@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6a535479ac2448c29afb308a1cd6fede-Waterboards]; Poach, Alonzo@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4296624036a34d9984d6c25c5c4f96b8-Waterboards]; Dustin Thaler [dut@vcrenewables.com]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]
Subject: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001
Attachments: dredgefillcalculator (1).xlsm

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Hannah,

I have done a preliminary review of your application. The following items are required to deem your application complete.

1. The application lists no temporary impacts therefore those impacts must be mitigated for, and the 3 to 1 mitigation ratio stands. The 3 to 1 ratio is consistent with all the solar Projects in the Lahontan Region and is a large reduction from the 12 to 1 ratio recommended by State Board staff. If you wish to reduce the mitigation required, I recommend updating your application to show the quantity of temporary impacts and provide a Restoration Plan for those temporary impacts. Please provide a Mitigation Plan indicating how permanent impacts will be mitigated for. If mitigation credits are being purchased please be sure to include the name of the mitigation bank, the name of the credit being purchased as this can change the mitigation ratio, and the quantity of credits being purchased. If completing a permittee responsible mitigation project, please be sure the Mitigation Plan includes a description of the proposed mitigation project and the success criteria along with monitoring and reporting requirements.
2. A preliminary Storm Water Pollution Prevention Plan (SWPPP) was provided with the application, but I saw no permanent BMPs rerouting waters of the State to prevent the run on of stormwater after the Project was complete. Please provide any construction plans (60% or greater) showing how stormwater will be dealt with once the Project is complete. Please note that the Lahontan Water Board does not recognize fiber rolls as a permanent BMP.
3. The construction start date is listed as 9/1/2025. Please update the construction start date.
4. Please explain what constitutes low impact grading and how it reduces erosion and sedimentation.
5. Please provide the Basin Plan Hydrologic Unit(s) and hydrologic area being impacted. The Water Board does not use HUCs. You can find the Basin Plan here ->
https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.html
6. Please provide impact maps to show which waters will be permanently or temporarily impacted within the area of disturbance. Please be sure the maps include the solar arrays and a legend.
7. Please submit the application and project fee. Please submit the fees to 15095 Amargosa Road, Building 2, Suite 210, Victorville, CA 92394 or you can pay online at https://www.waterboards.ca.gov/make_a_payment/. If you choose to pay online, please submit a copy of your receipt to keep the process moving. All checks must be made payable to the State Water Resources Control Board.

If you have any questions, please don't hesitate to contact me.

Tiffany Steinert
Engineering Geologist

15095 Amargosa Road
Building 2, Suite 210
Victorville, CA 92394

☎ 760-241-7305
☎ 760-241-6583 Front Desk

✉ tiffany.steinert@waterboards.ca.gov
[Home Page](#) | [Lahontan Regional Water Quality Control Board \(ca.gov\)](#)

***Please submit all 401 Certification/Dredge & Fill documentation to the Lahontan email box at lahontan@waterboards.ca.gov. If your Project has been assigned to a staff person please include their name ***

Scroll down to see instructions below and use this calculator to estimate Water Quality Certification application fees

This calculator is publicly available for informational purposes only and estimates fees in accordance with the fiscal year 2025-2026 water quality fee schedule. Applicants may use the calculator to budgeting. The State Water Board does not guarantee the accuracy of estimates generated by the calculator. The final fee amount **will be determined by Water Boards staff** in accordance with CCR 23, section 2200(a)(4). The State Water Board reserves the right to modify the calculator at any time.

[Waterboard Staff Directory](#)

[Current Fee Regulations](#)

Important note: This calculator may not be applicable to federal dischargers.

Please contact the State Water Board's Wetlands Permitting and Planning Manager with any questions

Combination Project: Check box for a combination deep water dredging and fill project; which are subject to both Category A and B fees.

	Discharge Size	Rounded Discharge Size	Application Fee	Category A Project Fee or Amendment Fee
Category A Fill & Excavation Discharges (Fee Code 84) Note: discharge size equals the sum of temporary and permanent impacts				
Discharge Area Acres x \$37,544	<input type="text" value="373"/>	373.00 <small>Rounded to two decimal places</small>	\$4,212	\$365,465

Category B* Dredging Discharges (Fee Code 86)

Expected Annual Dredge Quantity Cubic Yards x \$0.921	<input type="text"/>	0 <small>Rounded to whole number</small>	\$0	\$0
---	----------------------	--	------------	------------

**Category B Projects are billed annually and based on the quantity of material dredged during the year.*

Activity-Specific Fee Categories - Check ONE applicable box

	Application Fee
--	-----------------

Category C (Fee Code 85)

Sand Mining, In-Stream Gravel Mining and Beach Nourishment Discharges	<input type="checkbox"/>	\$0	-
---	--------------------------	------------	----------

Category D (Fee Code 85)

Ecological Restoration and Enhancement Projects	<input type="checkbox"/>	\$0	-
---	--------------------------	------------	----------

Category E (Fee Code 87)

Low Impact Discharges	<input type="checkbox"/>	\$0	-
-----------------------	--------------------------	------------	----------

Category F (Fee Code 85)

Emergency Projects authorized by a General Order	<input type="checkbox"/>	\$0	-
--	--------------------------	------------	----------

Category G Amended Orders - Check applicable box, Step 5 below

(1) All Category (D) Ecological and Restoration and Enhancement Projects, regardless of amendment type.	<input type="checkbox"/>			
(2) Administrative amendments including, but not limited to, ownership changes, typographic edits, or time extensions that do not result in a temporal loss of resource function. Amendments in this category require no technical analysis or additional compensatory mitigation.	<input type="checkbox"/>			
(3) Amendment results in change(s) in impact character, location, or volume of the discharge; or a time extension that results in temporal loss of resource function, according to the following criteria: -Amendment increases the active certification's impact quantity by less than 50 percent, and -Amendment does not require a change to the mitigated aquatic resource type.	<input type="checkbox"/>			Annual fee a discharge cat
(4) Amendment requires a supplemental CEQA analysis, or Amendment results in change(s) in impact character, location, or volume of the discharge, or a time extension that results in a temporal loss of resource function, according to the following criteria: -Amendment increases the active certification's impact quantity by more than 50 percent, or -Amendment requires a change to the mitigated aquatic resource type.	<input type="checkbox"/>			

Category H (Fee Code 19) Note: Maximum fee not applicable to this category

(H) Wildfire Mitigation by Electrical Corporations, Electric Utilities, and Electrical Cooperatives	<input type="checkbox"/>			
---	--------------------------	--	--	--

Total Fees	
Application Fee	Due with application
Category A Project Fee or Amendment Fee	Due prior to certification or amendment
Sum of Fees Due Prior to Authorization	Note to dischargers seeking an amendment to an existing order: Sum does not include any previously paid fee amounts
Annual Fee	Invoiced annually (unless maximum \$365,465 fee reached)

General instructions

Terms defining the measurement of a "discharge":

- Discharge of "**dredged material**" is measured by the volume of material removed in deep water dredging activities;
- Discharge of "**fill material**" is measured by the physical area of placement of fill material into a waterbody;
- Discharge of "**excavation material**" is measured by the physical area within a waterbody where earth-moving activities occur.

Generally, fees are determined by the size or volume of discharge to a water body. Fees for fill and/or excavation projects are based on discharge area in acres. Fees for deep water volume of dredged material removed in cubic yards. For further explanation, see (A) and (B) below. However, your project may qualify for a activity-specific fee category. If so, the fee for that category instead of size or volume (see (C) through (G) below). Amended orders may or may not be subject to fees depending on the complexity of analysis required to determine the fee associated with your project. Please contact Water Boards staff with further questions regarding how to use the calculator, [click here](#) for a link to the staff direct

Step 1 Determine the Fee Category for your project:

Fee Based on Fill or Excavation Discharge Size Within the Waterbody

(A) Do your project activities add fill material (soil, rocks, concrete, culverts(s), pier pilings, etc.) or excavate soil or other materials within a waterbody?

Fill refers to replacing any portion of a water with dry land, or to changing the bottom elevation or grade of any portion of a water. Fill material includes rock, sand, clay, plastics, coverburden from mining, or other construction activities, and materials used to create any structure or infrastructure within waters (culverts, pilings, etc.).

Excavation refers to removing sediment or soil in shallow waters or under no-flow conditions where impacts to beneficial uses are best described by the area of the excavation. It is other than navigation. Examples include earth-moving work such as trenching for utility lines; channel reconstruction; embankment construction; removing sediment to increase channel control and drainage maintenance activities (e.g. debris removal, vegetation management and removal, detention basin maintenance and erosion control of slopes along open channel facilities).

Fees Based on Discharge of Dredged Material

(B) Is your project deep water dredging? (except Sand Mining - see (C) below)

Dredging generally refers to removing sediment in deeper water to increase depth and typically occur to facilitate navigation. The impacts to beneficial uses are best described by the volume of sediment removed. Dredge volumes are expressed in cubic yards.

Fee Based on Activity-Specific Fee Categories

Does your project qualify for one of the following activity-specific fee categories? **To qualify for a activity-specific fee category, the entirety of all project activities must be in that activity-specific fee category**, i.e., the project cannot include other components involving activities not included within the activity-specific fee category.

(C) Sand Mining, In-Stream Gravel Mining and Beach Nourishment Discharges

Aggregate extraction in surface waters where source material is free of pollutants and the dredging operation will not violate any basin plan provisions and beach nourishment project requirements.

(D) Ecological Restoration and Enhancement Projects

The project meets the definition of an "Ecological Restoration and Enhancement Project" set forth in the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material adopted by the State Water Board on April 2, 2019:

Ecological Restoration and Enhancement Project means the project is voluntarily undertaken for the purpose of assisting or controlling the recovery of an aquatic ecosystem that has been destroyed to restore some measure of its natural condition and to enhance the beneficial uses, including potential beneficial uses of water. Such projects are undertaken:

1) in accordance with the terms and conditions of a binding stream or wetland enhancement or restoration agreement, or a wetland establishment agreement, between the real property owner and the project proponent conducting the habitat restoration or enhancement work and:

- a federal or state resource agency, including, but not limited to, the U.S. Fish and Wildlife Service, Natural Resources Conservation Service, Farm Service Agency, National Marine Fisheries Service, U.S. Environmental Protection Agency, U.S. Oceanic and Atmospheric Administration, U.S. Forest Service, U.S. Bureau of Land Management, California Department of Fish and Wildlife, California Wildlife Conservation Board, California State Lands Commission, or the Delta Conservancy;
- a local agency with the primary function of managing land or water for wetland habitat purposes; or
- a non-governmental conservation organization; or

2) by a state or federal agency that is statutorily tasked with natural resource management.

These projects do not include the conversion of a stream or natural wetland to uplands or stream channelization. It is recognized that Ecological Restoration and Enhancement Projects may include stream channelization, stream bank stabilization, stream bank maintenance or management to maximize fish, wildlife, habitat, or other ecological benefits, or filling gullied stream channels and similar rehabilitative activities to re-establish stream channel function. Changes in wetland plant communities that occur when wetland hydrology is more fully restored during rehabilitation activities are not considered a conversion to another aquatic habitat. Projects do not include actions required under a Water Board Order for mitigation, actions to service required mitigation, or actions undertaken for the primary purpose of land development.

(E) Low Impact Discharges

Projects may be classified as low impact discharges if they meet all of the following criteria:

- The discharge size is less than all of the following: (a) for fill, **0.1 acre, AND 300 linear feet**, and (b) for dredging, 25 cubic yards.
- The discharger demonstrates that: (a) all practicable measures will be taken to avoid impacts; (b) where unavoidable temporary impacts take place, waters and vegetation will be restored to pre-project conditions as quickly as practicable; and (c) where unavoidable permanent impacts take place, there will be no net loss of wetland, riparian area, or headwater functions, including stream channel connectivity, floodwater retention, and pollutant removal.
- The discharge will not do any of the following: (a) directly or indirectly destabilize a bed of a receiving water; (b) contribute to significant cumulative effects; (c) cause pollution, sedimentation, or erosion that adversely affect candidate, threatened, or endangered species; (e) degrade water quality or beneficial uses; (f) be toxic; or (g) include "hazardous" or "designated" material.

(F) Emergency Projects Authorized by a Water Board General Order

- RGP 8** Corps' Sacramento District
- RGP 5** Corps' San Francisco District
- RGP 63** Corps' Los Angeles District

(G) Amended Orders (go to Step 4)

(H) Wildfire Mitigation by Electrical Corporations, Electric Utilities, and Electrical Cooperatives

Dredge or fill activities conducted by electrical corporations, electric utilities, and electrical cooperatives pursuant to a wildfire mitigation plan prepared in accordance with Public Utilities Code section 8387(b)(1). This annual fee covers all dredge or fill activities conducted by the electrical corporations, electric utilities, and electrical cooperatives pursuant to a wildfire mitigation plan. Annual fee is assessed as \$40.00 per mile of project-specific dredge or fill fees in section 2200(a)(3)(A)-(G) for dredge or fill activities conducted pursuant to a wildfire mitigation plan. Annual fee is assessed as \$40.00 per mile of project-specific dredge or fill fees identified as high risk or high threat in the wildfire mitigation plan.

Step 2

If you have determined that your project qualifies for a activity-specific fee category (C through H) check the applicable box to calculate fees.

Step 3

A. Is your project a fill/excavation project?

If your project is a fill/excavation project, calculate your fee based on the size of the discharge area in acres. For projects with multiple impact sites, sum the individual discharge total in the calculator. For projects impacting multiple water features sum discharge quantities for all features. In addition, fees are based on the sum of both permanent and temporary discharge area shall be rounded to two decimal places (0.01 acre = 436 square feet). Category A discharges are subject to the sum of the Application fee and Project fee; the Application and the project fee is due prior to issuance of the certification; additional annual fees are assessed from the date of certification until project completion.

B. Is your project a dredging project? Your dredging fee will be based on the actual amount of material dredged from the waterbody. Therefore, annual active discharge invoice fiscal year's dredging amount. Invoice amounts will be based on the fee schedule current for that fiscal year. Please submit your application fee amount as shown in the calculator and upcoming annual active discharge fee using the current fee calculator. However, this will only be an estimate because fees are subject to change annually as approved by the State.

Combination fill/excavation and dredging Projects (A and B)

Does your dredging project also include a discharge of fill material? These projects typically include dredging material from one part of a waterbody and depositing the dredged material to the waterbody. These projects are subject to both Category A and Category B fees.

Step 4

Are you requesting an amendment to a previously issued water quality certification or WDR? Fees for amended orders are based on the increased quantity of discharge analysis required evaluate project changes, therefore Water Board staff will determine which category your amendment is subject. Water Board staff will determine the fee for amendment schedule and will request the applicant to submit the appropriate fee.

Fees based on amendments are categorized as follows:

(1) All Category (D) Ecological and Restoration and Enhancement Projects, regardless of amendment type. **No fee required**

(2) Administrative amendments including, but not limited to, ownership changes, typographic edits, or time extensions that do not result in a temporal loss of resource function. All require no technical analysis or additional compensatory mitigation. **No fee required**

(3) Amendment results in change(s) in impact character, location, or volume of the discharge; or a time extension that results in temporal loss of resource function, according to the following criteria:
-Amendment increases the active certification's impact quantity by **less than 50 percent**, and
-Amendment does not require a change to the mitigated aquatic resource type.

Additional standard fee assessed per increased amount of discharge(s). The minimum fee is \$4,212. For category A or B projects, enter discharge quantities for all increased quantities. For activity-specific fee categories, select the appropriate category.

(4) Amendment requires a supplemental CEQA analysis, or Amendment results in change(s) in impact character, location, or volume of the discharge, or a time extension that results in temporal loss of resource function, according to the following criteria:

-Amendment increases the active certification's impact quantity by **more than 50 percent**, or
-Amendment requires a change to the mitigated aquatic resource type.

Additional standard fee assessed per total amount of discharge(s). The minimum fee is \$4,212. For category A or B projects, enter discharge quantities for all previously certified quantities. For activity-specific fee categories, select the appropriate category.

Dischargers that have met the project fee cap will be assessed the minimum fee for each amendment of previously-issued WDR or water quality certification.

Step 5

See **Total Fees** for a breakdown of fees owed.

Step 6

Fee Types & Due Dates

Projects are subject to fees at three separate times throughout the life of a project. Application and Project Fees are determined according to the fee schedule in effect on the date of application submittal. Annual fees are determined according to the fee schedule in effect on the date of billing:

1) Application Fee: Amount due with the initial application.

2) Project Fee: Amount due prior to certification (applies to Category A only).

3) The Annual Fee amount is invoiced annually: All projects are subject to an Annual Fee each fiscal year or portion of a fiscal year that the certification is active (from the effective date of certification until the regional board or state board issues a Notice of Project Complete Letter to the discharger). The Water Boards fiscal year begins on July 1 and ends on June 30. Dischargers will be invoiced beginning in November/December of the year following the Effective Date of certification. An annual fee will be assessed based on the fee schedule in effect at the time the invoice is submitted and approved. The annual fee for category (A) fill and excavation discharges will be \$3,540 for the first five fiscal years following the effective date of the certification and the sixth fiscal year. The annual fee for category (B) dredging discharges will be invoiced after the annual dredge volume has been determined.

generate estimates for project
California Code of Regulations, Title

**Annual
Fee**

\$0

Estimated annual fee

\$0

ring the previous fiscal year

**Annual
Fee**

\$0

\$0

\$0

\$0

pplicable per
egory above.

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Fisheries Service, National
alifornia Coastal Conservancy or

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abitat type. These projects also

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contamination, or nuisance; (d)

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of overhead electrical lines

large quantities and enter the primary impacts. The size of the citation fee is due at the time of

copies are sent for the previous above. You may estimate your Water Board.

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amendments in this category

the following criteria:

increased impacts

results in a temporal loss of

project impacts, including

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effective date of the order until the invoiced their first Annual Fee is issued until a Notice of order, then \$563 beginning with

Variables

Example	FALSE
Shading	FALSE
Series	OfficeRead
Look	1.00

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 3/4/2026 8:43:28 PM
To: Steinert, Tiffany@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fdbc9163bf404f4d84f0a53c6ed84ab0-Waterboards]
CC: Guerra, Christina@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3c08929c117e4da5bfb45f48fa749c0a-Waterboards]; Zimmerman, Jan@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6a535479ac2448c29afb308a1cd6fede-Waterboards]; Poach, Alonzo@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4296624036a34d9984d6c25c5c4f96b8-Waterboards]; Dustin Thaler [dut@vcrenewables.com]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]
Subject: Re: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

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Hi Tiffany,

Thank you so much for this email. We will start working on these items ASAP and we will definitely be revising the application to clarify temporary vs. permanent impacts. We appreciate your coordination in this effort and I will be in touch as we move this forward.

Hannah

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>
Sent: Wednesday, March 4, 2026 12:02 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>; Poach, Alonzo@Waterboards <Alonzo.Poach@Waterboards.ca.gov>; Dustin Thaler <dut@vcrenewables.com>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Subject: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

Hi Hannah,

I have done a preliminary review of your application. The following items are required to deem your application complete.

1. The application lists no temporary impacts therefore those impacts must be mitigated for, and the 3 to 1 mitigation ratio stands. The 3 to 1 ratio is consistent with all the solar Projects in the Lahontan Region and is a large reduction from the 12 to 1 ratio recommended by State Board staff. If you wish to reduce the mitigation required, I recommend updating your application to show the quantity of temporary impacts and provide a Restoration Plan for those temporary impacts. Please provide a Mitigation Plan indicating how permanent impacts will be mitigated for. If mitigation credits are being purchased please be sure to include the name of the mitigation bank, the name of the credit being purchased as this can change the mitigation ratio, and the quantity of credits being purchased. If completing a permittee responsible mitigation project, please be sure the Mitigation Plan includes a description of the proposed mitigation project and the success criteria along with monitoring and reporting requirements.
2. A preliminary Storm Water Pollution Prevention Plan (SWPPP) was provided with the application, but I saw no permanent BMPs rerouting waters of the State to prevent the run on of stormwater after the Project was complete. Please provide any construction plans (60% or greater) showing how stormwater will be dealt with once the Project is complete. Please note that the Lahontan Water Board does not recognize fiber rolls as a permanent BMP.
3. The construction start date is listed as 9/1/2025. Please update the construction start date.
4. Please explain what constitutes low impact grading and how it reduces erosion and sedimentation.
5. Please provide the Basin Plan Hydrologic Unit(s) and hydrologic area being impacted. The Water Board does not use HUCs. You can find the Basin Plan here ->
https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.html
6. Please provide impact maps to show which waters will be permanently or temporarily impacted within the area of disturbance. Please be sure the maps include the solar arrays and a legend.
7. Please submit the application and project fee. Please submit the fees to 15095 Amargosa Road, Building 2, Suite 210, Victorville, CA 92394 or you can pay online at https://www.waterboards.ca.gov/make_a_payment/. If you choose to pay online, please submit a copy of your receipt to keep the process moving. All checks must be made payable to the State Water Resources Control Board.

If you have any questions, please don't hesitate to contact me.

Tiffany Steinert
Engineering Geologist

15095 Amargosa Road
Building 2, Suite 210
Victorville, CA 92394

- 760-241-7305
- 760-241-6583 Front Desk

✉ tiffany.steinert@waterboards.ca.gov
[Home Page | Lahontan Regional Water Quality Control Board \(ca.gov\)](#)

***Please submit all 401 Certification/Dredge & Fill documentation to the Lahontan email box at lahontan@waterboards.ca.gov. If your Project has been assigned to a staff person please include their name ***

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 3/12/2026 10:21:08 PM
To: Chris Huntley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=018948a34a3149c4a3833144594ae8b3-ff2eee5c-df]; Thea Benson [tbenson@rinconconsultants.com]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Jamison Miner [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e9a371186e0e402a994145a67d6e7684-546eb26e-f8]
Subject: Re: Soda Mountain: Essential Question and Clarification on Waters Impacts

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You are welcome to coordinate directly with Rincon on this. I don't need to attend unless you would like me to. If you can't reach Thea try David Deirtch - his cell is +1 (303) 818-6072

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Chris Huntley <Chuntley@aspeneg.com>
Sent: Thursday, March 12, 2026 3:19 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>; Thea Benson <tbenson@rinconconsultants.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>; Jamison Miner <JMiner@aspeneg.com>
Subject: Re: Soda Mountain: Essential Question and Clarification on Waters Impacts

Hannah,

I would like to call Thea to ask a quick question on the data. It is related to the table. Happy for a quick teams call.

Important.

Best regards,

Chris

Aspen

environmental group

Chris H
Executiv
President
Director
Biologica
Resourc
Office: (8
6714 | C
292-232
www.aspeneg.com

Agoura Hills | San Francisco | Sacramento | Inland Empire | Palm Springs

CONFIDENTIALITY NOTICE: This email may contain confidential or privileged information for the intended recipient(s) only. Unauthorized use or disclosure is prohibited.

From: Hannah Arkin <hannah@resolutionenvironmental.com>

Sent: Thursday, March 12, 2026 3:02 PM

To: Chris Huntley <Chuntley@aspeneg.com>; Thea Benson <tbenson@rinconconsultants.com>

Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>; Jamison Miner <JMiner@aspeneg.com>

Subject: Re: Soda Mountain: Essential Question and Clarification on Waters Impacts

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If suspicious, do not click links, open attachments, or provide credentials.

Hi Chris,

SMSP02791

Received and working on this ASAP.

Thanks!
Hannah

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Chris Huntley <Chuntley@aspeneg.com>
Sent: Thursday, March 12, 2026 2:57:02 PM
To: Thea Benson <tbenson@rinconconsultants.com>; Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>; Jamison Miner <JMiner@aspeneg.com>
Subject: Soda Mountain: Essential Question and Clarification on Waters Impacts

Thea and Hannah,

I need some clarification as soon as possible on some of the waters data. Can you show me where the amount of waters within the arrays versus the amount of waters within the LOD that will be out of the arrays is located? That will likely reduce mitigation ratios for that area.

I am available by phone or email. Thank you for rushing the request.

Best regards,

Chris



Chris H
Executiv
Presiden
Director
Biologica
Resourc
Office: (5
6714 | C
292-232
www.aspeneg.com

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From: Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]
Sent: 3/9/2026 5:04:25 PM
To: Hampal, Jaspinder@DOT [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4f3d66f965c448a28762b4efd9c8b9ab-8227717a-bd]
CC: D8_1N590_Questions@DOT [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e44ffe1ccb9b43f384b4f52fbbe738c9-f33f0950-c5]
Subject: Re: Status of I-15 Wildlife Crossings

Thank you Jas!

Eric Knight
Program Manager
Siting, Transmission, and Environmental Protection Division

From: Hampal, Jaspinder@DOT <Jaspinder.Hampal@dot.ca.gov>
Sent: Monday, March 9, 2026 10:03 AM
To: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Cc: D8_1N590_Questions@DOT <D8_1N590_Questions@dot.ca.gov>
Subject: Re: Status of I-15 Wildlife Crossings

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Hi Eric,

Thank you for reaching out. Here are the corrected dates for project EA 1N590. Please let me know if you have any questions. Thank you, and I hope you have a great day.

Design, Engineering and Right-of-Way	April 2026
Begin Construction	November 2026
End Project	November 2028

Regards,

Jas Hampal
Public Information Officer (PIO)
State of California, Department of Transportation
District 8, Administration
Office: 909-383-1910

For information in District 8 visit one of the following:
Customer service request? Submit a ticket here: <https://csr.dot.ca.gov>
Visit Caltrans QuickMap for real-time traffic updates: <https://quickmap.dot.ca.gov>
<https://x.com/Caltrans8>
<https://x.com/CaltransHQ>
www.facebook.com/caltrans8
www.dot.ca.gov

From: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Sent: Thursday, March 5, 2026 12:38 PM
To: D8 PIO@DOT <D8.PIO@dot.ca.gov>
Cc: D8_1N590_Questions@DOT <D8_1N590_Questions@dot.ca.gov>
Subject: Status of I-15 Wildlife Crossings

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Greetings -

The California Energy Commission (CEC) is considering an application requesting a license from the CEC to construct and operate the Soda Mountain Solar Project, to be located approximately 7 miles southwest of Baker in San Bernardino County, [Soda Mountain Solar Project | California Energy Commission](#)

The CEC has received public comments on the Draft EIR prepared for the project requesting that project construction is delayed (should the CEC approve the project), until the Soda Mountain bighorn sheep crossing has been constructed. According to Caltrans' website, construction of the I-15 Wildlife Crossings was to begin in December 2025.

Schedule

Project Approval & Environmental Document	July 2024
Design, Engineering and Right-of-Way	April 2025
Begin Construction	December 2025
End Project	April 2027

[I-15 Wildlife Crossings | Caltrans](#)

Is there an updated schedule that can be shared with the CEC?

Eric Knight
Program Manager
Siting and Environmental Branch
Siting, Transmission, and Environmental Protection Division
California Energy Commission
www.energy.ca.gov



From: Thea Benson [tbenson@rinconconsultants.com]
Sent: 3/13/2026 12:29:33 AM
To: Chris Huntley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=018948a34a3149c4a3833144594ae8b3-ff2eee5c-df]; Hannah Arkin [hannah@resolutionenvironmental.com]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Jamison Miner [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e9a371186e0e402a994145a67d6e7684-546eb26e-f8]; David Daitch [ddaitch@rinconconsultants.com]
Subject: RE: [EXT] Re: Soda Mountain: Essential Question and Clarification on Waters Impacts

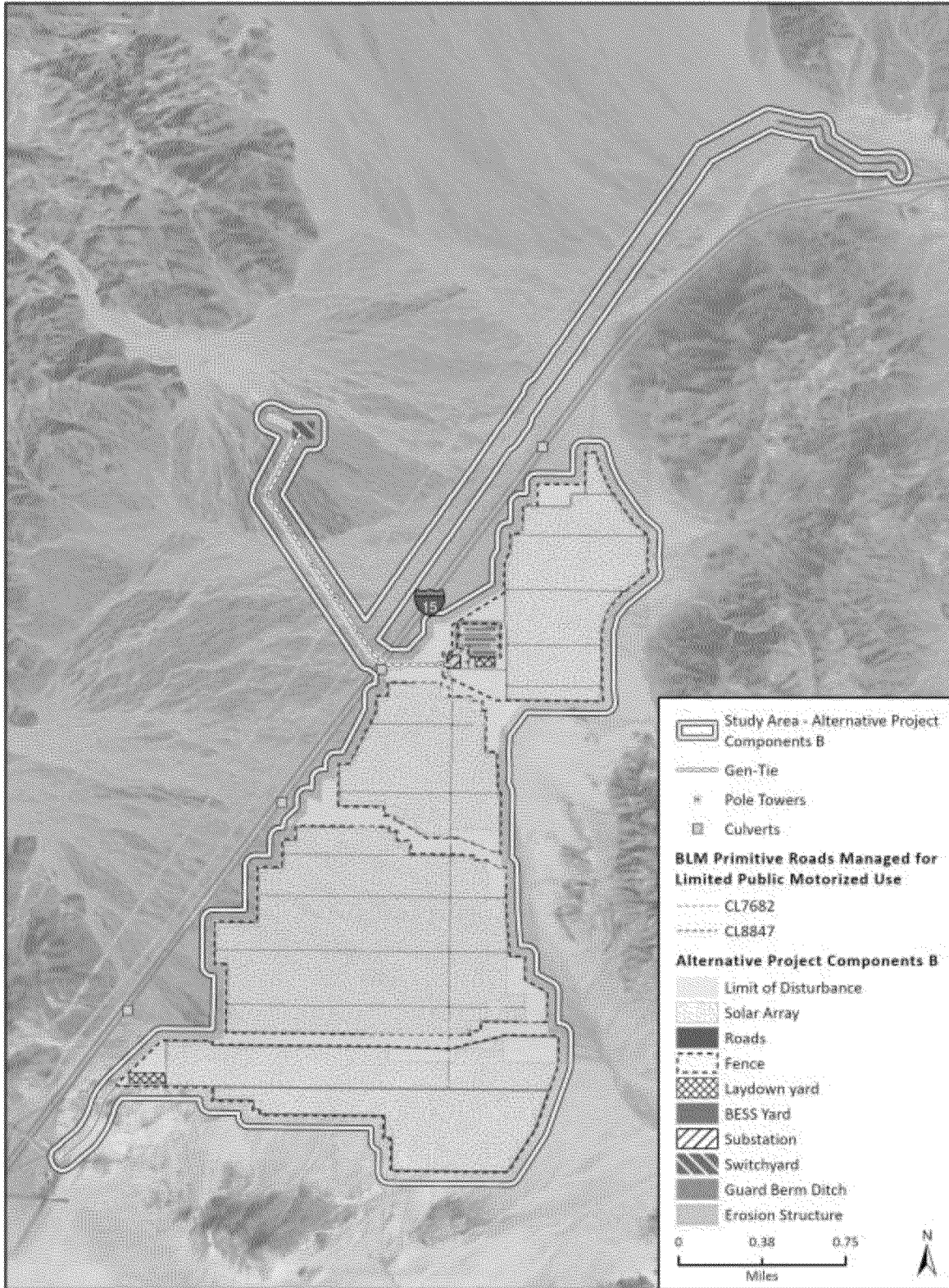
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Chris,

The project components within the boundaries of the arrays that will result in permanent impacts are the roads and array footings (as shown in the figure below). The breakdown of waters impacts within the arrays is provided in table below:

Soar Array Name	Impact to State Waters (acres)		
	Temporary Impact	Permanent Impacts	Total
Solar Array - East Array	158.75	2.84	161.59
Solar Array - South Array 1	98.44	1.77	100.21
Solar Array - South Array 2	293.29	5.53	298.82
Solar Array - South Array 3	132.38	2.33	134.71
Total Solar Array Footings	0	55.00	55.00
Total	682.86	12.47	750.33

Figure 5 Alternative Project B Components



Thea



Thea Benson

Supervising Biologist/Project Manager

tbenson@rinconconsultants.com

805-644-4455 Main | 805-946-1876 Teams | 805-423-8443 Mobile

San Luis Obispo, California

Out of Office Alert: March 27-31, 2026

From: Thea Benson
Sent: Thursday, March 12, 2026 4:24 PM
To: 'Chris Huntley' <Chuntley@aspeneg.com>; Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov; Jamison Miner <JMiner@aspeneg.com>; David Daitch <ddaitch@rinconconsultants.com>
Subject: RE: [EXT] Re: Soda Mountain: Essential Question and Clarification on Waters Impacts

Chris,
Following up on our phone conversation.
The following provides the state water impacts within each array.

Name	Acres
Solar Array - East Array	161.59
Solar Array - South Array 1	100.21
Solar Array - South Array 2	298.82
Solar Array - South Array 3	134.71
Total	695.33

Additionally, the total waters impacts within the Limits of Disturbance (does not include the BLM Road) is **998.10 acres**.

Please let me know if you have any additional questions.

Thea



Thea Benson
Supervising Biologist/Project Manager
tbenson@rinconconsultants.com
805-644-4455 Main | 805-946-1876 Teams | 805-423-8443 Mobile
San Luis Obispo, California
Out of Office Alert: March 27-31, 2026

From: Chris Huntley <Chuntley@aspeneg.com>
Sent: Thursday, March 12, 2026 3:29 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>; Thea Benson <tbenson@rinconconsultants.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov; Jamison Miner <JMiner@aspeneg.com>
Subject: [EXT] Re: Soda Mountain: Essential Question and Clarification on Waters Impacts

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Roger that and thank you.

Best regards,

Chris



Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneg.com

Agoura Hills | San Francisco | Sacramento | Inland Empire | Palm Springs

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From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Thursday, March 12, 2026 3:21 PM
To: Chris Huntley <Chuntley@aspenege.com>; Thea Benson <tbenson@rinconconsultants.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>;
Jamison Miner <JMiner@aspenege.com>
Subject: Re: Soda Mountain: Essential Question and Clarification on Waters Impacts



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You are welcome to coordinate directly with Rincon on this. I don't need to attend unless you would like me to. If you can't reach Thea try David Deirtch - his cell is +1 (303) 818-6072

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Chris Huntley <Chuntley@aspenege.com>
Sent: Thursday, March 12, 2026 3:19 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>; Thea Benson <tbenson@rinconconsultants.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>; Jamison Miner <JMiner@aspenege.com>
Subject: Re: Soda Mountain: Essential Question and Clarification on Waters Impacts

Hannah,

I would like to call Thea to ask a quick question on the data. It is related to the table. Happy for a quick teams call.

Important.

Best regards,

Chris



Chris H
Executiv
Presiden
Director
Biologica
Resourc
Office: (8
6714 | C
292-232
www.asi

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From: Hannah Arkin <hannah@resolutionenvironmental.com>

Sent: Thursday, March 12, 2026 3:02 PM

To: Chris Huntley <Chuntley@aspeneq.com>; Thea Benson <tbenson@rinconconsultants.com>

Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>; Jamison Miner <JMiner@aspeneq.com>

Subject: Re: Soda Mountain: Essential Question and Clarification on Waters Impacts

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links or open attachments unless you recognize the sender and know the content is safe. If the email is a phish or spam, please report it using the "Report Message" button.

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Hi Chris,

Received and working on this ASAP.

Thanks!
Hannah

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Chris Huntley <Chuntley@aspeneg.com>

Sent: Thursday, March 12, 2026 2:57:02 PM

To: Thea Benson <tbenson@rinconconsultants.com>; Hannah Arkin <hannah@resolutionenvironmental.com>

Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>;
Jamison Miner <JMiner@aspeneg.com>

Subject: Soda Mountain: Essential Question and Clarification on Waters Impacts

Thea and Hannah,

I need some clarification as soon as possible on some of the waters data. Can you show me where the amount of waters within the arrays versus the amount of waters within the LOD that will be out of the arrays is located? That will likely reduce mitigation ratios for that area.

I am available by phone or email. Thank you for rushing the request.

Best regards,

Chris



Chris H
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President
Director
Biologica
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6714 | C
292-232
www.aspen.org

environmental group

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From: Ackerman, James@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3CC35DE240CF4253AF9CC7D3D2CBB643-ACKERMAN, J]
Sent: 3/4/2026 8:05:10 PM
To: Steinert, Tiffany@Waterboards [Tiffany.Steinert@Waterboards.ca.gov]
Subject: RE: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

Thanks for keeping us informed Tiffany, and I am glad the applicant has decided to move ahead with this process.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>
Sent: Wednesday, March 4, 2026 12:02 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>; Poach, Alonzo@Waterboards <Alonzo.Poach@Waterboards.ca.gov>; Dustin Thaler <dut@vcrenewables.com>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Subject: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

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Hi Hannah,

I have done a preliminary review of your application. The following items are required to deem your application complete.

1. The application lists no temporary impacts therefore those impacts must be mitigated for, and the 3 to 1 mitigation ratio stands. The 3 to 1 ratio is consistent with all the solar Projects in the Lahontan Region and is a large reduction from the 12 to 1 ratio recommended by State Board staff. If you wish to reduce the mitigation required, I recommend updating your application to show the quantity of temporary impacts and provide a Restoration Plan for those temporary impacts. Please provide a Mitigation Plan indicating how permanent impacts will be mitigated for. If mitigation credits are being purchased please be sure to include the name of the mitigation bank, the name of the credit being purchased as this can change the mitigation ratio, and the quantity of credits being purchased. If completing a permittee responsible mitigation project, please be sure the Mitigation Plan includes a description of the proposed mitigation project and the success criteria along with monitoring and reporting requirements.
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Please provide any construction plans (60% or greater) showing how stormwater will be dealt with once the Project is complete. Please note that the Lahontan Water Board does not recognize fiber rolls as a permanent BMP.

3. The construction start date is listed as 9/1/2025. Please update the construction start date.
4. Please explain what constitutes low impact grading and how it reduces erosion and sedimentation.
5. Please provide the Basin Plan Hydrologic Unit(s) and hydrologic area being impacted. The Water Board does not use HUCs. You can find the Basin Plan here ->
https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.html
6. Please provide impact maps to show which waters will be permanently or temporarily impacted within the area of disturbance. Please be sure the maps include the solar arrays and a legend.
7. Please submit the application and project fee. Please submit the fees to 15095 Amargosa Road, Building 2, Suite 210, Victorville, CA 92394 or you can pay online at https://www.waterboards.ca.gov/make_a_payment/. If you choose to pay online, please submit a copy of your receipt to keep the process moving. All checks must be made payable to the State Water Resources Control Board.

If you have any questions, please don't hesitate to contact me.

Tiffany Steinert
Engineering Geologist

15095 Amargosa Road
Building 2, Suite 210
Victorville, CA 92394

☎ 760-241-7305
☎ 760-241-6583 Front Desk

✉ tiffany.steinert@waterboards.ca.gov

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***Please submit all 401 Certification/Dredge & Fill documentation to the Lahontan email box at lahontan@waterboards.ca.gov. If your Project has been assigned to a staff person please include their name ***

From: Ackerman, James@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3CC35DE240CF4253AF9CC7D3D2CBB643-ACKERMAN, J]
Sent: 3/6/2026 5:07:42 PM
To: Steinert, Tiffany@Waterboards [Tiffany.Steinert@Waterboards.ca.gov]
Subject: RE: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

Thank you for the clarification, Tiffany.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>
Sent: Friday, March 6, 2026 7:11 AM
To: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Cc: Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>
Subject: RE: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

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Hi James,

This is a common point of confusion. Clean Water Act Section 401 provides certification authority for activities that may result in a discharge to Waters of the United States. However, the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs) regulate Waters of the State, which is a broader category. The authority to issue Waste Discharge Requirements (WDRs) for dredge and fill activities in Waters of the State comes from California's Porter-Cologne Water Quality Control Act, not the Clean Water Act. Porter-Cologne establishes the Water Boards' independent authority to regulate all discharges that could affect waters of the state, regardless of federal jurisdiction.

Please don't hesitate to contact me with any other questions.

Tiffany Steinert
Engineering Geologist

R6 LAHONTAN
R6 Land Disposal, Stormwater & 401 Program

Email: Tiffany.Steinert@Waterboards.ca.gov
Phone: +1 (760) 241-7305

SMSP02805

Regional Water Quality Control Boards
15095 Amargosa Road, Building 2, Suite 210, Victorville CA 92394
Website: www.waterboards.ca.gov



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From: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Sent: Thursday, March 5, 2026 5:39 PM
To: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>
Subject: RE: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

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Tiffany: I am currently responding to public comments, including from the applicant, and I have come across a question regarding the regulatory authority for the SWCRB/RWQCBs to regulate Waters of the State.

I was under the impression that the regulatory authority for the Water Boards to issue Dredge and Fill WDRs for Waters of the State came from Clean Water Act Section 401.

Is that no longer the case?

And if so, what is the State regulatory authority for Dredge and Fill WDRs.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>

Sent: Wednesday, March 4, 2026 12:02 PM

To: Hannah Arkin <hannah@resolutionenvironmental.com>

Cc: Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>; Poach, Alonzo@Waterboards <Alonzo.Poach@Waterboards.ca.gov>; Dustin Thaler <dut@vcrenewables.com>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Ackerman, James@Energy <james.ackerman@energy.ca.gov>

Subject: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

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Hi Hannah,

I have done a preliminary review of your application. The following items are required to deem your application complete.

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3. The construction start date is listed as 9/1/2025. Please update the construction start date.
4. Please explain what constitutes low impact grading and how it reduces erosion and sedimentation.
5. Please provide the Basin Plan Hydrologic Unit(s) and hydrologic area being impacted. The Water Board does not use HUCs. You can find the Basin Plan here ->
https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.html
6. Please provide impact maps to show which waters will be permanently or temporarily impacted within the area of disturbance. Please be sure the maps include the solar arrays and a legend.
7. Please submit the application and project fee. Please submit the fees to 15095 Amargosa Road, Building 2, Suite 210, Victorville, CA 92394 or you can pay online at https://www.waterboards.ca.gov/make_a_payment/. If you choose to pay online, please submit a copy of your receipt to keep the process moving. All checks must be made payable to the State Water Resources Control Board.

If you have any questions, please don't hesitate to contact me.

Tiffany Steinert
Engineering Geologist

15095 Amargosa Road
Building 2, Suite 210
Victorville, CA 92394

☎ 760-241-7305
☎ 760-241-6583 Front Desk

✉ tiffany.steinert@waterboards.ca.gov

SMSP02807

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From: Ackerman, James@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3CC35DE240CF4253AF9CC7D3D2CBB643-ACKERMAN, J]
Sent: 3/7/2026 12:27:17 AM
To: Steinert, Tiffany@Waterboards [Tiffany.Steinert@Waterboards.ca.gov]
CC: Guerra, Christina@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3c08929c117e4da5fb45f48fa749c0a-Waterboards]
Subject: RE: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

No worries.

With respect to groundwater production, the Soda Mountain Solar Project site is in a regulatory black hole, with the exception of the County Desert Groundwater Management ordinance.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>
Sent: Friday, March 6, 2026 4:23 PM
To: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Cc: Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>
Subject: RE: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

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Hi James,

Sorry about that my brain only saw adjudicated.

Tiffany Steinert
Engineering Geologist

R6 LAHONTAN
R6 Land Disposal, Stormwater & 401 Program

Email: Tiffany.Steinert@Waterboards.ca.gov
Phone: +1 (760) 241-7305

SMSP02809

Regional Water Quality Control Boards
15095 Amargosa Road, Building 2, Suite 210, Victorville CA 92394
Website: www.waterboards.ca.gov



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To: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>
Subject: RE: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

Thanks for the quick response.

That's why I stipulated "unadjudicated"; Soda Mountain is outside of the Mojave Water Agency Regional Boundary.

Have a good weekend.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>
Sent: Friday, March 6, 2026 4:14 PM
To: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Cc: Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>
Subject: RE: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

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SMSP02810

Hi James,

We do not. In this instance it would be the Mojave Water Agency.

Tiffany Steinert
Engineering Geologist

R6 LAHONTAN
R6 Land Disposal, Stormwater & 401 Program

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Phone: +1 (760) 241-7305

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Sent: Friday, March 6, 2026 4:12 PM
To: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>
Subject: RE: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

Tiffany: I have another question, but don't expect a response until next week.

Usually, the installation of groundwater production wells is under county jurisdiction, except for CEC permitting.

Does the LRWQCB have any jurisdiction over groundwater production well installation in unadjudicated groundwater basins?

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>
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Tiffany Steinert
Engineering Geologist

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Subject: Soda Mountain Solar Project - Notice of Incomplete WDID # 6B362603001

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Tiffany Steinert
Engineering Geologist

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☎ 760-241-6583 Front Desk

✉ tiffany.steinert@waterboards.ca.gov

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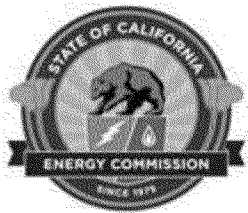
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Sent: 3/12/2026 1:15:31 AM
To: Steinert, Tiffany@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=fdbc9163bf404f4d84f0a53c6ed84ab0-Waterboards]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Additional Information Sent by Applicant to Docket, Soda Mountain Solar Project

Tiffany: Just a heads up; Resolution Environmental posted several documents to the docket today.

The last seven may be of use to you.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Ackerman, James@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3CC35DE240CF4253AF9CC7D3D2CBB643-ACKERMAN, J]
Sent: 3/13/2026 8:34:38 PM
To: Steinert, Tiffany@Waterboards [Tiffany.Steinert@Waterboards.ca.gov]
CC: Guerra, Christina@Waterboards [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3c08929c117e4da5bfb45f48fa749c0a-Waterboards]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Hughes, Joseph@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7dd5e80572b644209e9607ba7bdcb630-Hughes, Jos]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]
Subject: RE: Soda Mountain Solar - Design Plans

Tiffany: If it is still available, Monday from 10 AM to Noon works for best for our staff.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>
Sent: Wednesday, March 11, 2026 10:36 AM
To: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Cc: Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>
Subject: Soda Mountain Solar - Design Plans

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi James,

We'd like to meet with you to discuss a possible permitting hiccup. I just spoke with the consultants (Rincon), and they don't have design plans for us to review. I need the design plans to verify the impacts to waters which directly impact the amount of mitigation that will be required. Please provide us with some dates and times when you would be available to meet. Below is our availability:

3/11 – 2PM – 3 PM
3/16 – 10AM – Noon; 1PM – 2PM
3/17 – 3PM – 4PM

Availability after this is early April.

Tiffany Steinert
Engineering Geologist

15095 Amargosa Road
Building 2, Suite 210
Victorville, CA 92394

☎ 760-241-7305
☎ 760-241-6583 Front Desk

✉ tiffany.steinert@waterboards.ca.gov
[Home Page](#) | [Lahontan Regional Water Quality Control Board \(ca.gov\)](#)

***Please submit all 401 Certification/Dredge & Fill documentation to the Lahontan email box at lahontan@waterboards.ca.gov. If your Project has been assigned to a staff person please include their name ***

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 3/4/2026 3:58:25 PM
To: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
CC: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Re: Inquiry about DOI News

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Hi Kaycee,

The DOI has communicated an approval to move forward to the BLM California State Office and Barstow Field Office, which have begun to finalize review. We've been in communication with Marc Stamer at BLM and our understanding is he will be reaching out to CEC shortly to discuss.

Thanks!
Hannah

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Sent: Tuesday, March 3, 2026 12:27:36 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Inquiry about DOI News

Hello Hannah,

May we please ask if the Soda Mountain Solar Project is impacted by this news about the Department of Interior? If you are able to provide a response by Thursday, that would be helpful for our knowledge. Please let me know if a call would be easier to discuss.

Thank you,
Kaycee
Kaycee Chang (she, her, hers)
Supervisor
CEQA Project Management
Siting and Environmental Branch
Siting, Transmission, and Environmental Protection Division
Work: 1-916-232-6319
Cell: 1-916-208-6545
California Energy Commission
Website: www.energy.ca.gov



Book time to meet with me

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 3/10/2026 4:10:18 PM
To: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Fw: Soda Mountain Data Needs
Attachments: Figure 3-9.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kaycee,

Lisa requested that we update Figure 3-9 (attached) in her email below. Could you please clarify if you want the new project components (alternative project components B)? This figure is referencing the old project plan, so just want to ensure you get the figure you need.

We are also on track to get you all the responses today, although they will probably arrive after 5pm so we will docket them first thing in the morning.

Hannah

Hannah Arkin
CEO
Resolution Environmental
<https://resolutionenvironmental.com/>
148 H Avenue, Coronado, CA 92118
760-504-4109

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

Hi Hannah,

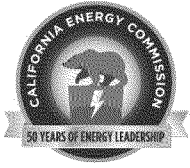
Please see the requests below. We also need the GIS shape files showing the stormwater infrastructure described in the Updated Hydrology Report (in particular, the berms and channel protecting the switchyard and BESS).

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)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367



From: Chris Huntley <Chuntley@aspeneg.com>

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

To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Jamison Miner <jminer@aspeneg.com>

Subject: Soda Mountain Data Needs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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).
- 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.
- Provide applicant data for permanent impacts for the t-line, towers, road realignment, temp disturbance areas, etc.
- Please confirm there are no storm water basins as I observed in the latest JD.

For waters:

- Please provide the same information and be clear on any permanent feature located in CDFW waters.
- Please also provide the acreage of any waters impacted by the berm and channel. Include the temp disturbance areas needed to support that work.

- 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

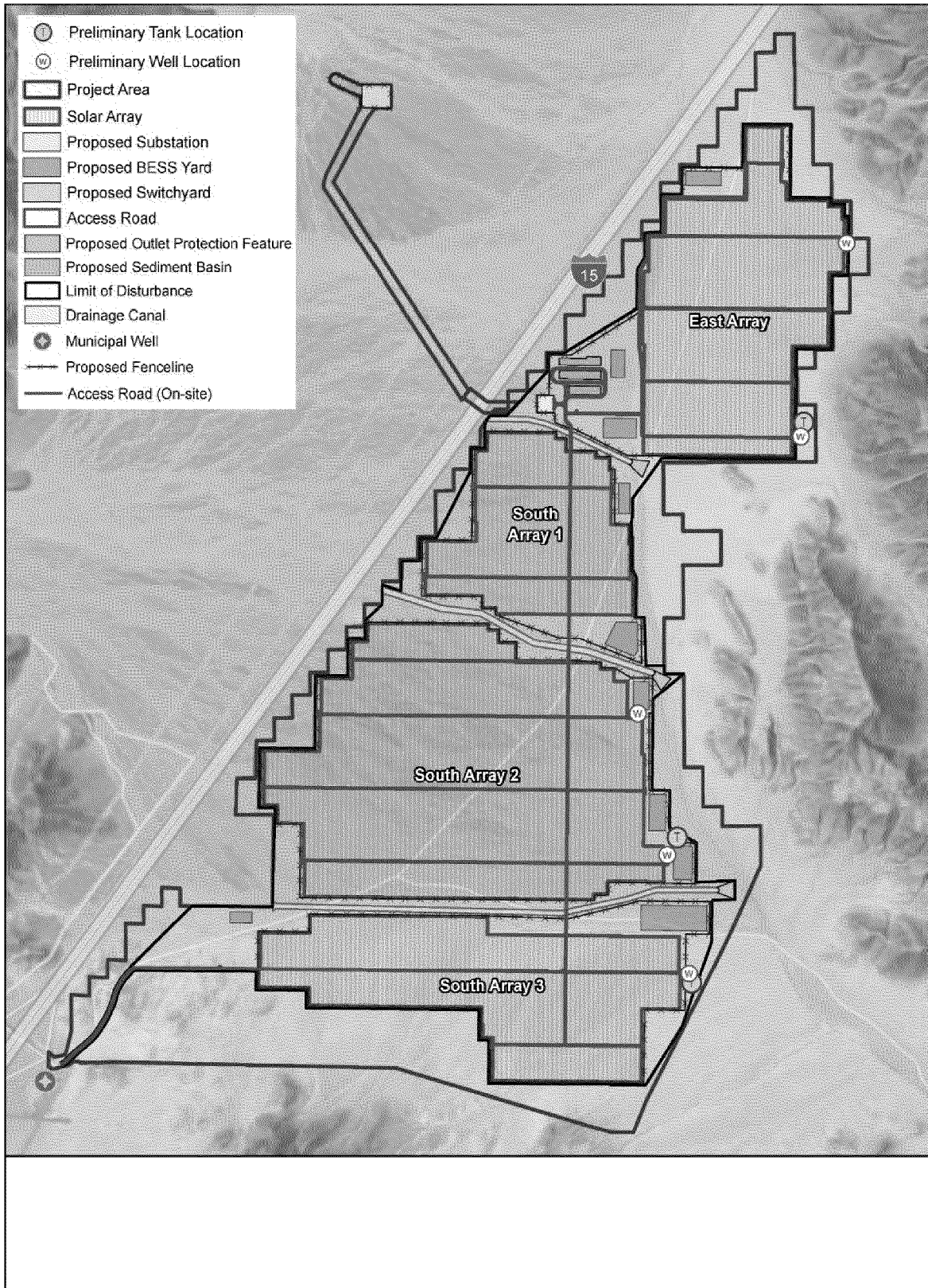


Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneg.com

Agoura Hills | San Francisco | Sacramento | Inland Empire | Palm Springs

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Figure 3-9 Proposed Stormwater Infrastructure



Source: RE 2025eeee

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 3/10/2026 8:44:34 PM
To: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Fw: Soda Mt. Hydrology

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kaycee,

This email thread also has the responses to the hydrology questions below. I will docket this tomorrow, along with the other information I will be sharing later today.

Thanks!

Hannah Arkin
CEO
Resolution Environmental
<https://resolutionenvironmental.com/>
148 H Avenue, Coronado, CA 92118
760-504-4109

From: Jessica Canales <Jessica@trwengineering.com>
Sent: Tuesday, March 10, 2026 1:39 PM
To: kaycee.chang@energy.ca.gov <kaycee.chang@energy.ca.gov>
Cc: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Fw: Soda Mt. Hydrology

Hi Kaycee,

See below for the revised CAD files and Drainage Report on Soda Mountain. Let me know if you have any issues accessing it.

Thanks,

Jessica Canales, EIT, CFM
Engineer II



SMSP02824

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Tuesday, March 10, 2026 12:37 PM
To: Jessica Canales <Jessica@trwengineering.com>
Cc: Natascha McKenzie <Natascha@trwengineering.com>; Tory Walker <Tory@trwengineering.com>
Subject: Re: Soda Mt. Hydrology

Thank you! I appreciate you all working so quickly on this! Do we need to provide Rincon with this CAD file revision, or has that already been done?

If you could also please make the drop box sharable with kaycee.chang@energy.ca.gov, I would appreciate it.

Hannah Arkin
CEO
Resolution Environmental
https://link.edgepilot.com/s/04c7f1f7/4gOptKsWwkO5IWiqEGE_dg?u=http://www.resolutionenvironmental.com/
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Jessica Canales <Jessica@trwengineering.com>
Sent: Tuesday, March 10, 2026 12:33 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Natascha McKenzie <Natascha@trwengineering.com>; Tory Walker <Tory@trwengineering.com>
Subject: Re: Soda Mt. Hydrology

Good afternoon Hannah,

We have revised the CAD files and Drainage Report and provided them in the DropBox link:
<https://link.edgepilot.com/s/462e1c9a/PR3sw217BEq1VapMOxsvYg?u=https://www.dropbox.com/scl/fo/7d8iy10ms27fsofua0j8z/AHGmr-Qe1oUx1EBylkxslLo?rlkey=h4ta0czf9wfj33ih4ozkj53tu%26st=zpymlrt5%26dl=0>

In direct response to the questions posed below,

1. The runoff coefficient is calculated according the San Bernadino County Hydrology Manual within AES based on the:
 - a. Rainfall intensity at the calculated time of concentration
 - b. Percent pervious and impervious within the drainage area
 - c. Infiltration rate for the pervious area

This calculation was performed within the AES software, and the output is included in the Attachment 2 of the Drainage Report. The equation for the runoff coefficient was added to the drainage report for reference, as well as a table summarizing the related land use inputs into AES. The resulting runoff is conservative, and will be further revised during final engineering.

2. The soil map was produced using data downloaded directly from the USDA Web Soil Survey. A clarifying statement has been added to the report.

Let me know if that clarifies everything, or if there are follow-up questions.
Thank you,

Jessica Canales, EIT, CFM
Engineer II

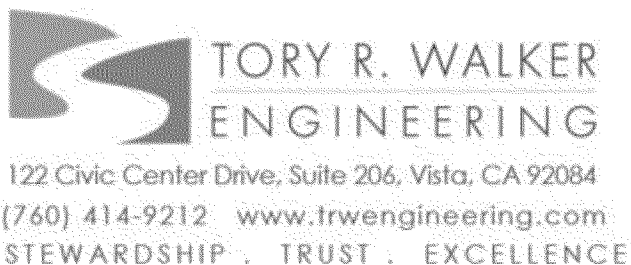


From: Tory Walker <Tory@trwengineering.com>
Sent: Monday, March 9, 2026 12:24 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>; Natascha McKenzie <Natascha@trwengineering.com>; Jessica Canales <Jessica@trwengineering.com>
Subject: RE: Soda Mt. Hydrology

Thanks, Hannah, we are working on the minor revisions and on formal responses to these questions.

****For all scheduling requests, please cc Cassie Lee, cassie@trwengineering.com***

Tory Walker, PE, CFM, QISP
President



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From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Monday, March 9, 2026 10:38 AM
To: Tory Walker <Tory@trwengineering.com>; Natascha McKenzie <Natascha@trwengineering.com>; Jessica Canales

<Jessica@trwengineering.com>

Subject: Fw: Soda Mt. Hydrology

Hello TWE,

I hope you guys had a great weekend! Below are the follow-up questions from our CEC meeting on Friday.

Thanks!

Hannah Arkin

CEO

Resolution Environmental

<https://link.edgepilot.com/s/70b6d41d/SFzzORJg0eT-7AtHOPUwA?u=https://resolutionenvironmental.com/>

148 H Avenue, Coronado, CA 92118

760-504-4109

From: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>

Sent: Monday, March 9, 2026 10:19 AM

To: Hannah Arkin <hannah@resolutionenvironmental.com>

Subject: Re: Soda Mt. Hydrology

Hi Hannah,

Gotcha, thank you for the clarification. I checked with the team and here are the questions:

1. The runoff coefficient (C) was not provided in the Rational Method calculations. Based on the reported values, a coefficient of approximately 0.85 was back-calculated, which is higher than expected for a highly pervious Soil Group A area. Please clarify the C-value that was used in the calculations.
2. There is an inconsistency between the current and previous soil analyses. TRWE classified the entire site as Type A soils, while the earlier SWCA analysis identified both Type A and Type B soils using data from the Soil Watershed Study, the 2009 Jurisdictional Determination Report by URS, and NRCS sources. Please provide the source of TRWE's soil classification to address this discrepancy.

Thank you,

Kaycee

Kaycee Chang (she, her, hers)

Supervisor

Siting, Transmission, and Environmental Protection Division



[Book time to meet with me](#)

From: Chang, Kaycee@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DD3D2FC8670840BDA4ACDC455903E787-CHANG, KAYC]
Sent: 3/3/2026 8:27:36 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
CC: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Inquiry about DOI News
Attachments: Interior jump-starts solar energy permitting.pdf

Hello Hannah,

May we please ask if the Soda Mountain Solar Project is impacted by this news about the Department of Interior? If you are able to provide a response by Thursday, that would be helpful for our knowledge. Please let me know if a call would be easier to discuss.

Thank you,

Kaycee

Kaycee Chang (she, her, hers)

Supervisor

CEQA Project Management

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Book time to meet with me

GREENWIRE

Interior jump-starts solar energy permitting

Over the summer, the Trump administration created new permitting hurdles for renewable energy. Some solar projects are now starting to move through the new process.



BY: **SCOTT STREATER** | 02/26/2026 01:31 PM EST



Transmission towers are shown near solar panels from the 100-megawatt MGM Resorts Mega Solar Array after it was launched on June 28, 2021, in Dry Lake Valley, Nevada. | Ethan Miller/AFP via Getty Images

GREENWIRE | The Interior Department could be softening its stance against solar energy.

Interior is reviewing at least 20 commercial-scale projects that have languished in the permitting pipeline since President Donald Trump took office in January 2025,

according to three agency career officials familiar with the process.

That includes a package of six utility-scale projects given the green light Friday by Interior Secretary Doug Burgum to resume active reviews, such as the massive Esmeralda Energy Center in Nevada, said the officials, who were granted anonymity because they are not authorized to discuss the matter.

This marks a significant turn by the Trump administration, which this summer put in place unique permitting hurdles for renewable energy. Burgum and other officials also routinely deride solar and wind energy as “unreliable” and “intermittent” energy sources that cannot be counted on when the wind stops blowing and the sun goes down at night.

It comes as the Trump administration grapples with the artificial intelligence boom — and the electricity demands helping hike consumer power bills. Even some congressional Republicans have chafed at the Trump blockade of renewables, while Nevada’s Republican governor over the summer complained of losing economic development opportunities.

But solar industry officials cautioned against assuming there’s a permanent thaw in the Trump administration’s cold view of green energy.

“American solar companies at large are still in the dark about whether or how their projects and permits will be considered by the Department of the Interior,” said Sean Gallagher, senior vice president of policy at the Solar Energy Industries Association.

Interior said in a statement this week that it is “actively reviewing permitting” for large-scale solar and wind projects. The agency has created a process aimed at “strengthening accountability, preventing misuse of taxpayer-funded subsidies, and upholding our commitment to restoring balance in energy development,” the statement said.

Interior’s renewable-specific policies require the secretary or deputy secretary to approve virtually every permitting action for solar and wind projects before they can advance — a move put in place in July that critics say has essentially halted project reviews. In August, Burgum also issued a policy order directing Interior to consider “capacity density” when evaluating solar and wind projects. That policy puts solar and wind projects at a disadvantage because they generally use more land than other kinds of energy development.

“This comprehensive review process ensures that projects — whether on federal, state, or private lands — receive appropriate oversight whenever federal resources, permits, or consultations are involved,” Interior said.

But Gallagher said the industry “needs a clear and fair permitting process.”

“Project developers need confidence that their projects will be able to move through the permitting process in good faith and without unfair treatment based on energy source,” he said.

The industry doesn’t have that now, said Michael Gerrard, director of the Sabin Center for Climate Change Law at Columbia Law School.

“There may be quiet indications that the Interior Department is lowering some of the roadblocks,” Gerrard said, “but this administration is so erratic and unpredictable that it’s tough to make a billion-dollar investment in the hopes that rationality will prevail and persist.”

Projects span Arizona, California, Nevada

The 20 or so solar proposals the Bureau of Land Management is reviewing for potential approval are commercial-scale projects, collectively capable of powering potentially millions of homes. All of them would incorporate energy storage technology allowing them to feed power to the grid at night.

They were all under review and in various stages of the permitting process at the end of the Biden administration. Some were at the beginning stages, while others were near the permitting finish line, or were already approved and needed authorization to begin construction, according to the three Interior officials.

Projects recently green-lighted by Burgum to restart reviews include the Jove Solar Project in southwest Arizona, and the Redonda Solar and Bajada Solar projects in California, the officials said. The three projects would have a combined capacity to power roughly 450,000 homes.

Also on the list are three projects highlighted by Nevada Gov. Joe Lombardo, a Republican, in a letter he sent to Burgum last summer describing the economic fallout of Interior’s solar shift.

The three solar projects — Boulder Solar III, Dry Lake East and Libra Solar — were close to final approval, Lombardo wrote, and Interior’s permitting slowdown threatened power purchase agreements between the project developers and NV Energy, the state’s largest public utility, which had agreed to buy electricity from the three solar plants.

The 700-MW Libra Solar project, proposed on 5,100 acres of federal lands in southwestern Nevada, had actually been approved by BLM through a record of decision in 2024, but the formal right-of-way permit to begin construction had not been issued.

BLM in December announced it had amended the project layout, and other mostly minor changes, and the project has recently been authorized to start construction, one of the senior Interior Department officials confirmed.

Interior indicated in its statement that it considers solar part of the administration's ongoing efforts to ramp up domestic energy production, which is needed to power energy-intensive data centers that are needed to win the artificial intelligence technology race with China.

"Utility-scale solar, while not a baseload source, plays an important role in diversifying domestic power generation," the statement said. "Expanding energy capacity by utilizing resources on public lands is critical to meeting the Trump administration's broader goal of increasing reliable domestic power production — a key factor in supporting advanced technologies, including artificial intelligence."

A new permitting process

Solar and wind projects that move through the federal review process today will encounter a very different permitting landscape than the one established by the Biden administration.

In late 2024, BLM finalized updates to the "Western Solar Plan," which is designed to guide development of utility-scale solar projects to federal lands deemed to have high energy potential and low natural resource conflicts. The agency designated roughly 32 million acres of bureau rangelands in 11 states as priority areas for solar project applications with a streamlined permitting process.

Even some environmentalists balked at the prospect of so much of the West potentially being overtaken by sprawling solar farms.

In contrast, under the recent Interior policy implemented in July, seemingly routine steps like "preconstruction environmental surveys" and "access road authorizations" will need a sign off from Burgum or Deputy Secretary Kate MacGregor.

Critics within the industry called the requirements a "shadow ban." More questions were raised in October when Interior canceled the Esmeralda 7 development in Nevada, which as conceived of during the Biden administration combined seven proposed solar farms into one of the world's largest projects.

While Burgum pledged the individual projects would be able to move forward individually, Sen. Catherine Cortez Masto (D-Nev.) bemoaned the "chaos and confusion" caused by the Trump administration.

But things began to change in December, when the Interior Department began working with BLM to prioritize a list of solar projects that were near completion or close enough to where the secretary would need to only approve a few steps, the Interior officials said.

One of the Interior officials said Burgum's office is now routinely requesting BLM send "briefing memorandums" on these specific solar and wind projects. The memos describe each project and outline the list of items the secretary needs to approve before they can move forward.

The secretary's office then reviews the permitting items needing approval and then authorizes BLM to begin each step. Once these steps are completed, another batch of requests is then sent to Burgum's office, the official said.

The process can be time-consuming, but the Interior official said Burgum has been addressing these requests quickly and that some of the briefing memo items have been reviewed and authorized in as few as three days.

Esmeralda 7

The test of Interior's renewed openness to solar could end up being the components of the Esmeralda 7 project.

Spread across 185 square miles in Esmeralda County, northwest of Las Vegas, the seven projects collectively could produce enough electricity to power more than 2 million homes.

BLM in 2024 approved a draft programmatic environmental impact statement for the project, and it had been on schedule to obtain final approval through a record of decision by July 2025.

Most of the companies behind the original Esmeralda 7 project confirmed that they are planning to push their individual projects through the permitting process.

NextEra Energy Resources, which has proposed the Esmeralda Energy Center, will be the first to advance a project through the federal permitting process. MacGregor, the deputy secretary who also worked as a high-level Interior official in the first Trump administration, worked as a vice president at NextEra between the Trump terms.

The Juno Beach, Florida-based company — one of six companies behind the seven projects comprising the original Esmeralda 7 — said last year that it planned to push forward.

Neil Nissan, a company spokesperson, said that nothing has changed since last fall, and the project “remains in the early stages of development.”

The other six projects that were part of original Esmeralda 7 are expected to get approval to advance in the coming weeks, according to the three officials.

Representatives with Leeward Renewable Energy, the developer of the 1,000-MW Lone Mountain Solar project, and Chicago-based Invenergy, which has proposed the 500-MW Nivloc Solar project, confirmed they still plan to move their projects forward with permitting.

Ditto for San Diego-based Avantus, which has proposed the Red Ridge 1 and Red Ridge 2 solar plants capable of producing a combined 1,200 MW of electricity.

“For several months we have been preparing for a comprehensive [environmental] analysis of these projects and look forward to working with BLM and local stakeholders as we move these projects forward,” said Katie Struble, Avantus’ vice president of corporate communications.

A representative with a fourth company, Houston-based Repsol Renewables North America, said they are still “reviewing the status and the prospects” of moving forward with the 1,000-MW Smoky Valley Solar project but have not made any decision on how to proceed.

Representatives with Arevia Power, which has proposed the 1,500-MW Gold Dust Solar project, did not respond to requests for comment.

Burgum has pushed back against critics of his agency’s handling of the Esmeralda 7 project.

He told Fox Business in an interview shortly after the project was canceled in October that he expected the individual solar development companies to submit “permits for each of those individually,” and that none of the individual projects had been terminated.

“It’s still under review, still moving ahead, but being broken into smaller individual projects in coordination with the developer,” he said.

Scott Streater can be reached on Signal at s_streater.80.

UP NEXT IN THIS EDITION OF GREENWIRE

Interior’s lawyer nixes ‘land into trust’ deals for tribes in Alaska

BY MICHAEL DOYLE





YOUR ACCOUNT MANAGEMENT TEAM

Katie Randle

Customer Engagement Specialist

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Katie Schneider

Account Manager, Government

kschneider@politico.com

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From: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Sent: 3/11/2026 5:13:59 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
Subject: Re: Soda Mountain Data Needs

Hi Hannah,

Within the project description, I'm thinking of leaving the current Figure 3-9 as is to show the original proposed stormwater infrastructure. We updated some of the language explaining the changes and I think it'd be helpful to have an updated figure to accompany that. That said, can you provide an updated Figure 3-9 and remove the proposed outlet protection features (bright green), proposed sediment basins (aqua), and drainage canals (light blue)?

Thank you,
Kaycee

Kaycee Chang (she, her, hers)
Supervisor
Siting, Transmission, and Environmental Protection Division



Book time to meet with me

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Tuesday, March 10, 2026 9:10 AM
To: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Fw: Soda Mountain Data Needs

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Hi Kaycee,

Lisa requested that we update Figure 3-9 (attached) in her email below. Could you please clarify if you want the new project components (alternative project components B)? This figure is referencing the old project plan, so just want to ensure you get the figure you need.

We are also on track to get you all the responses today, although they will probably arrive after 5pm so we will docket them first thing in the morning.

Hannah

Hannah Arkin
CEO
Resolution Environmental
<https://resolutionenvironmental.com/>
148 H Avenue, Coronado, CA 92118
760-504-4109

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

SMSP02836

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).

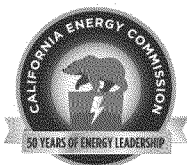
We will also need an updated project figure showing the updated stormwater features. See SA Figure 3-9.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Chris Huntley <Chuntley@aspeneg.com>

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

To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Jamison Miner <jminer@aspeneg.com>

Subject: Soda Mountain Data Needs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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).

- 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.
- Provide applicant data for permanent impacts for the t-line, towers, road realignment, temp disturbance areas, etc.
- Please confirm there are no storm water basins as I observed in the latest JD.

For waters:

- Please provide the same information and be clear on any permanent feature located in CDFW waters.
- Please also provide the acreage of any waters impacted by the berm and channel. Include the temp disturbance areas needed to support that work.
- 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
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneg.com

Agoura Hills | San Francisco | Sacramento | Inland Empire | Palm Springs

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SMSP02838

From: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Sent: 3/12/2026 7:25:37 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
Subject: Re: Figure 3-9

Hi Hannah,

Would it be possible to make the updates to the original Figure 3-9 and remove the proposed outlet protection features (bright green), proposed sediment basins (aqua), and drainage canals (light blue)?

Thank you,
Kaycee

Kaycee Chang (she, her, hers)
Supervisor
Siting, Transmission, and Environmental Protection Division



Book time to meet with me

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Thursday, March 12, 2026 10:02 AM
To: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Figure 3-9

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kaycee,

Please see below and attached for 2 figure options for 3-9. Let me know which one you prefer and I can docket it.

Hannah Arkin
CEO
Resolution Environmental
<https://resolutionenvironmental.com/>
148 H Avenue, Coronado, CA 92118
760-504-4109

From: Marlyng Gama <mgama@rinconconsultants.com>
Sent: Thursday, March 12, 2026 10:00 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>; Emily Gaston <egaston@rinconconsultants.com>; David Daitch <ddaitch@rinconconsultants.com>
Subject: Re: [EXT] Fw: Soda Mountain Data Needs

Hi Hannah,

Attached please find both versions of the updated figures.

The file labeled "Alternative Project B Components" includes the alternative project (current project design) and does not include the stormwater features.

The file labeled "Project Component A" is the old project design with only the stormwater features removed as indicated in the email below. Please note that the overall project boundaries are different for each design.

Please let me know if you have any questions.

Thanks.



Marlyng Gama

Supervising Biologist

mgama@rinconconsultants.com

805-644-4455 Main | 805-880-0514 Direct

From: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>

Sent: Wednesday, March 11, 2026 10:13 AM

To: Hannah Arkin <hannah@resolutionenvironmental.com>

Subject: Re: Soda Mountain Data Needs

Hi Hannah,

Within the project description, I'm thinking of leaving the current Figure 3-9 as is to show the original proposed stormwater infrastructure. We updated some of the language explaining the changes and I think it'd be helpful to have an updated figure to accompany that. That said, can you provide an updated Figure 3-9 and remove the proposed outlet protection features (bright green), proposed sediment basins (aqua), and drainage canals (light blue)?

Thank you,
Kaycee

Kaycee Chang (she, her, hers)

Supervisor

Siting, Transmission, and Environmental Protection Division



Book time to meet with me

From: Longman, Renee@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=56333A9ACBA74875B8C0175B8BEA5D52-77429D54-8C]
Sent: 3/11/2026 4:55:01 PM
To: Selassie, Amanuel [Amanuel.Selassie@ladwp.com]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Jahani, Ali@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f8f445ffe13c487f984c7faa81a70101-d55ecce6-49]; Ha, Tin [Tin.Ha@ladwp.com]; Lakshman, Sunaja [Sunaja.Lakshman@ladwp.com]; Enriquez, Rodolfo [Rodolfo.Enriquez@ladwp.com]; Barner, James [James.Barner@ladwp.com]; Rucic, Nermina [Nermina.Rucic@ladwp.com]
Subject: RE: [EXTERNAL] Question about the role of Los Angeles Board of Water and Power Commissioners

Good morning-

Do you have an update on this question? Sorry, if I missed a previous response. Kaycee, Ali, and I, are assisting on this project while Lisa is away and we are working very hard to finalize our Updated Staff Assessment (including Final EIR).

Thank you,

Renee Longman AICP, LEED AP BD+C
Project Manager
Siting, Transmission and Environmental Protection Division

From: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Sent: Monday, March 9, 2026 4:06 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Jahani, Ali@Energy <Ali.Jahani@energy.ca.gov>; Longman, Renee@Energy <Renee.Longman@Energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Barner, James <James.Barner@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: RE: [EXTERNAL] Question about the role of Los Angeles Board of Water and Power Commissioners

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Hello Lisa,

I will get back to you by the end of tomorrow. Thank you for your patience.

Thank you!

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, March 5, 2026 3:01 PM
To: Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Nassiri, Ashkan <Ashkan.Nassiri@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Jahani, Ali@Energy <Ali.Jahani@energy.ca.gov>; Longman, Renee@Energy <Renee.Longman@Energy.ca.gov>
Subject: [EXTERNAL] Question about the role of Los Angeles Board of Water and Power Commissioners

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Hi all,

We published our Staff Assessment, which includes a Draft EIR and received comments from the applicant that we would like to verify with LADPW.

The applicant stated: " Various parts of the Staff Assessment refer to the Los Angeles Board of Water and Power Commissioners instead of Los Angeles Department of Water and Power (LADWP). LADWP determines its own internal approval processes and delegations of authority and therefore the global reference should be to LADWP not the Los Angeles Board of Water and Power Commissioners."

Is this statement correct? We understood that the Los Angeles Board of Water and Power Commissioners were the appropriate approval authority for LADWP activities as proposed in the Soda Mountain Solar Project.

I would appreciate your response by Monday March 9th as we are working very hard to finalize our Updated Staff Assessment (including Final EIR).

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



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From: Longman, Renee@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=56333A9ACBA74875B8C0175B8BEA5D52-77429D54-8C]
Sent: 3/12/2026 6:39:44 PM
To: Selassie, Amanuel [Amanuel.Selassie@ladwp.com]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Jahani, Ali@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f8f445ffe13c487f984c7faa81a70101-d55ecce6-49]; Ha, Tin [Tin.Ha@ladwp.com]; Lakshman, Sunaja [Sunaja.Lakshman@ladwp.com]; Enriquez, Rodolfo [Rodolfo.Enriquez@ladwp.com]; Barner, James [James.Barner@ladwp.com]; Rucic, Nermina [Nermina.Rucic@ladwp.com]
Subject: RE: [EXTERNAL] Question about the role of Los Angeles Board of Water and Power Commissioners

Hi Selassie,

Thank you for the detailed response. It is greatly appreciated.

Renee Longman AICP, LEED AP BD+C
Project Manager
Siting, Transmission and Environmental Protection Division

From: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>
Sent: Thursday, March 12, 2026 11:35 AM
To: Longman, Renee@Energy <Renee.Longman@Energy.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Jahani, Ali@Energy <Ali.Jahani@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Barner, James <James.Barner@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: RE: [EXTERNAL] Question about the role of Los Angeles Board of Water and Power Commissioners

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Hello Renee,

This project involves multiple parties, and coordinating a response among everyone takes some time. Thanks for your patience. Please see below our response to your question.

Although the Los Angeles Board of Water and Power Commissioners oversees and sets policy for LADWP, the Soda Mountain Solar Project (SMSP) is proposed to interconnect to the Marketplace-Adelanto 500kV Transmission Line, which is part of the Mead-Adelanto Project (MAP). As previously noted in our response (dated 12/05/25) to one of the questions CEC had posted, MAP is jointly owned by multiple Southern California Public Power Authority (SCPPA) participants and Startrans IO, LLC, with LADWP serving as the Operating Agent. Accordingly, the approval of the interconnection of the Soda Mountain Project to the MAP transmission system falls under the MAP jurisdiction which requires approval from the SCPPA Board and Startrans IO, LLC.

Thank you!

From: Longman, Renee@Energy <Renee.Longman@Energy.ca.gov>
Sent: Wednesday, March 11, 2026 9:55 AM
To: Selassie, Amanuel <Amanuel.Selassie@ladwp.com>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Jahani, Ali@Energy <Ali.Jahani@energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Barner, James <James.Barner@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: RE: [EXTERNAL] Question about the role of Los Angeles Board of Water and Power Commissioners

Good morning-

Do you have an update on this question? Sorry, if I missed a previous response. Kaycee, Ali, and I, are assisting on this project while Lisa is away and we are working very hard to finalize our Updated Staff Assessment (including Final EIR).

Thank you,

Renee Longman AICP, LEED AP BD+C
Project Manager
Siting, Transmission and Environmental Protection Division

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Sent: Monday, March 9, 2026 4:06 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Jahani, Ali@Energy <Ali.Jahani@energy.ca.gov>; Longman, Renee@Energy <Renee.Longman@Energy.ca.gov>; Ha, Tin <Tin.Ha@ladwp.com>; Lakshman, Sunaja <Sunaja.Lakshman@ladwp.com>; Enriquez, Rodolfo <Rodolfo.Enriquez@ladwp.com>; Barner, James <James.Barner@ladwp.com>; Rucic, Nermina <Nermina.Rucic@ladwp.com>
Subject: RE: [EXTERNAL] Question about the role of Los Angeles Board of Water and Power Commissioners

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Hello Lisa,

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Subject: [EXTERNAL] Question about the role of Los Angeles Board of Water and Power Commissioners

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I would appreciate your response by Monday March 9th as we are working very hard to finalize our Updated Staff Assessment (including Final EIR).

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



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From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 3/12/2026 5:02:13 PM
To: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Figure 3-9
Attachments: Fig 5 Alternative Project B Components.jpg; Fig Y Project Components A - removed stormwater.jpg

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kaycee,

Please see below and attached for 2 figure options for 3-9. Let me know which one you prefer and I can docket it.

Hannah Arkin
CEO
Resolution Environmental
<https://resolutionenvironmental.com/>
148 H Avenue, Coronado, CA 92118
760-504-4109

From: Marlyng Gama <mgama@rinconconsultants.com>
Sent: Thursday, March 12, 2026 10:00 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>; Emily Gaston <egaston@rinconconsultants.com>; David Daitch <ddaitch@rinconconsultants.com>
Subject: Re: [EXT] Fw: Soda Mountain Data Needs

Hi Hannah,

Attached please find both versions of the updated figures.

The file labeled "Alternative Project B Components" includes the alternative project (current project design) and does not include the stormwater features.

The file labeled "Project Component A" is the old project design with only the stormwater features removed as indicated in the email below. Please note that the overall project boundaries are different for each design.

Please let me know if you have any questions.

Thanks.



Marlyng Gama
Supervising Biologist
mgama@rinconconsultants.com
805-644-4455 Main | 805-880-0514 Direct

SMSP02846

From: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Sent: Wednesday, March 11, 2026 10:13 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Re: Soda Mountain Data Needs

Hi Hannah,

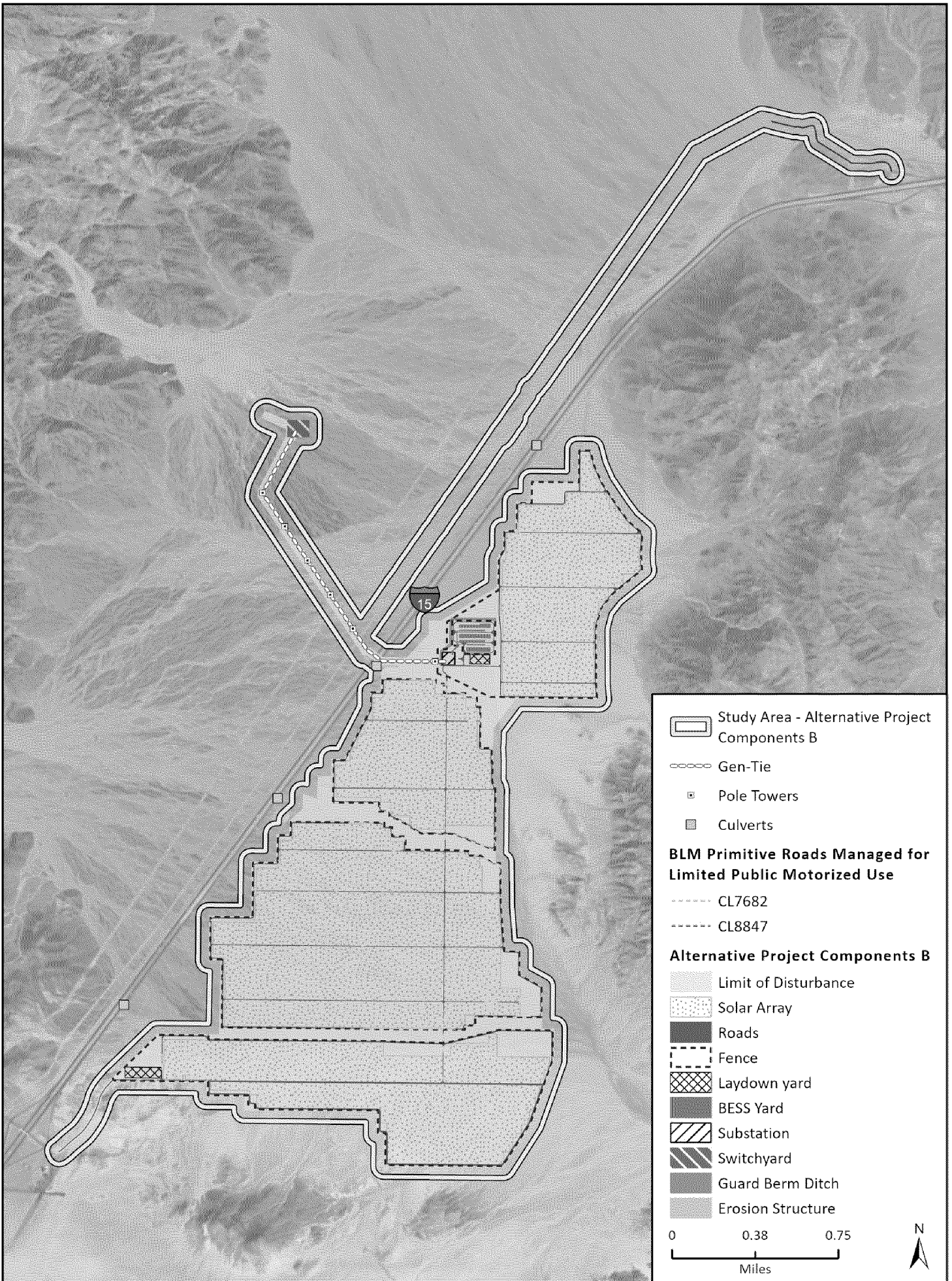
Within the project description, I'm thinking of leaving the current Figure 3-9 as is to show the original proposed stormwater infrastructure. We updated some of the language explaining the changes and I think it'd be helpful to have an updated figure to accompany that. That said, can you provide an updated Figure 3-9 and remove the proposed outlet protection features (bright green), proposed sediment basins (aqua), and drainage canals (light blue)?

Thank you,
Kaycee

Kaycee Chang (she, her, hers)
Supervisor
Siting, Transmission, and Environmental Protection Division

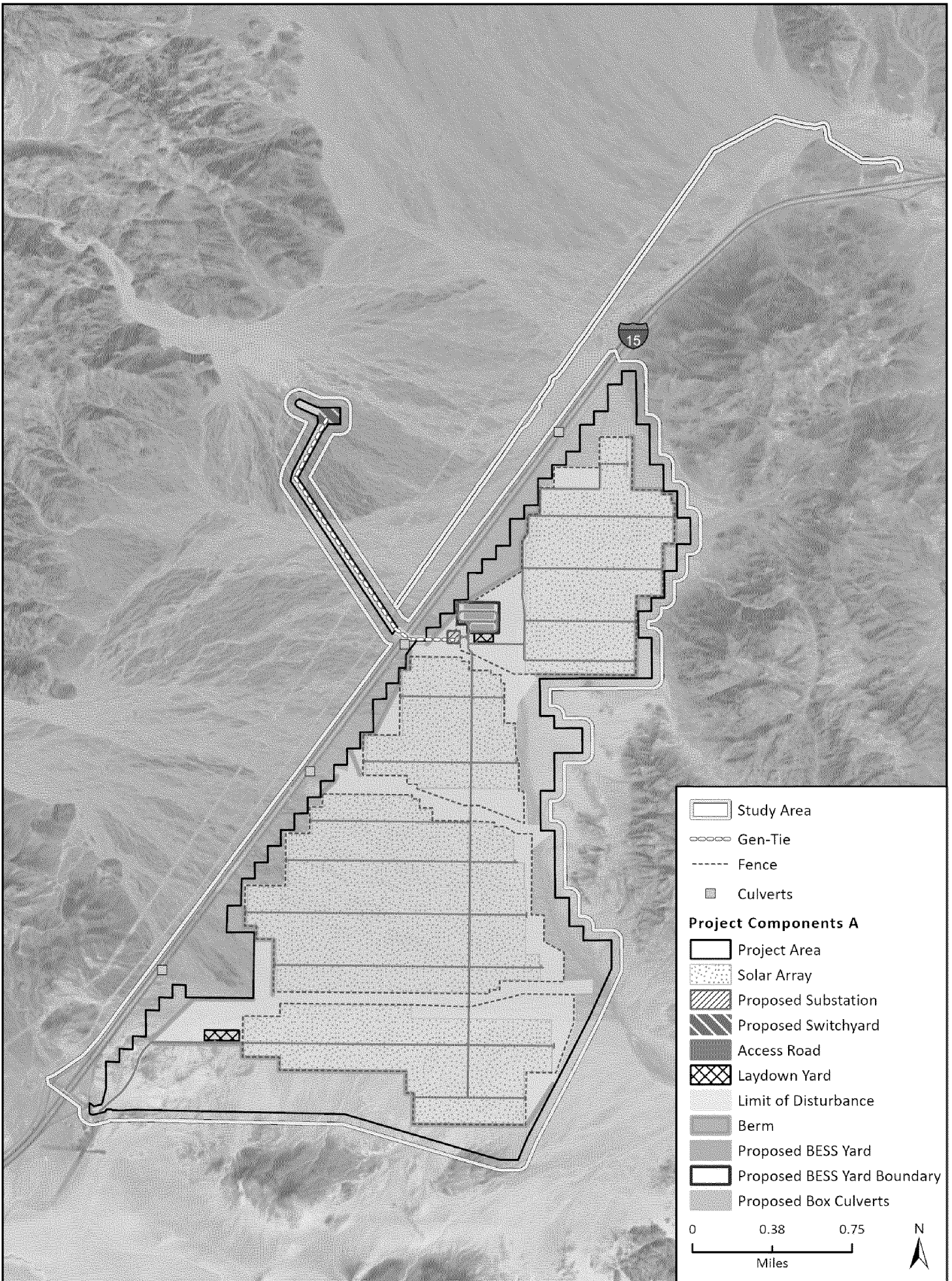


Book time to meet with me



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25-17245 JD
Fig Y Alternative Project Components B



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25-17245 JD
Fig Y Project Components A

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 3/4/2026 8:36:13 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Fw: Meeting request for Soda Mountain- question about changes to project description

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

Just FYI - I am planning to wait to docket any additional information until I hear back from y'all on this email. I just want to make sure it answers all the questions your team had.

Thanks!
Hannah

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Wednesday, March 4, 2026 9:05:57 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Chris Huntley <chuntley@aspeneq.com>
Cc: Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Jamison Miner <jminer@aspeneq.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Subject: Re: Meeting request for Soda Mountain- question about changes to project description

Hi All,

We reviewed all our submittals for a reference to sediment basins and found the following:

1. **JD** - The JD mentions sediment basins in Figure 4 and Table 5. However, these references compare impacts from "Project A" (original design with berms) to "Project B" (current design with no berms). Figure 4 shows the original project layout with berms and Table 5 contrasts impacts between Project A (first columns) and Project B (second columns).
2. **Alternatives**- The reference to sediment basins in Section 4.2 of the response letter also refers to the proposed project, prior to implementation of MM HYD-1, which is the mitigation required to remove the sediment basins.

I am happy to docket a clarifying statement regarding both of these references to sediment basins within the documents and reiterating the fact that sediment basins will not occur after implementation of MM HYD-1, under any project or alternatives scenario.

I also noticed that we made a slight error and calculated a 0.64-mile buffer, rather than a 0.62 buffer in the alternatives analysis. This is a negligible acreage difference (we are calculating it now) and has no change to the

determinations stated in the text. However, I can also clarify this minor text revision in the same statement I add to the docket related to clarifying sediment basins.

Does this help resolve the issue? We are happy to have a meeting to discuss, if that would help.

Hannah Arkin
CEO
Resolution Environmental
<https://resolutionenvironmental.com/>
148 H Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Tuesday, March 3, 2026 5:40 PM
To: Chris Huntley <chuntley@aspenerg.com>; Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Jamison Miner <jminer@aspenerg.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Subject: Re: Meeting request for Soda Mountain- question about changes to project description

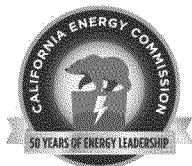
I also thought I saw something in your comments on alternatives regarding the different buffers that mention basins.

Please make sure you correct these comments as soon as possible. We need it corrected in the record.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Chris Huntley <Chuntley@aspenerg.com>
Sent: Tuesday, March 3, 2026 5:14 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Jamison Miner <jminer@aspenerg.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Subject: Re: Meeting request for Soda Mountain- question about changes to project description

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Hannah,

I might be mistaken, but I saw it in the jurisdictional delineation maps.

Chris

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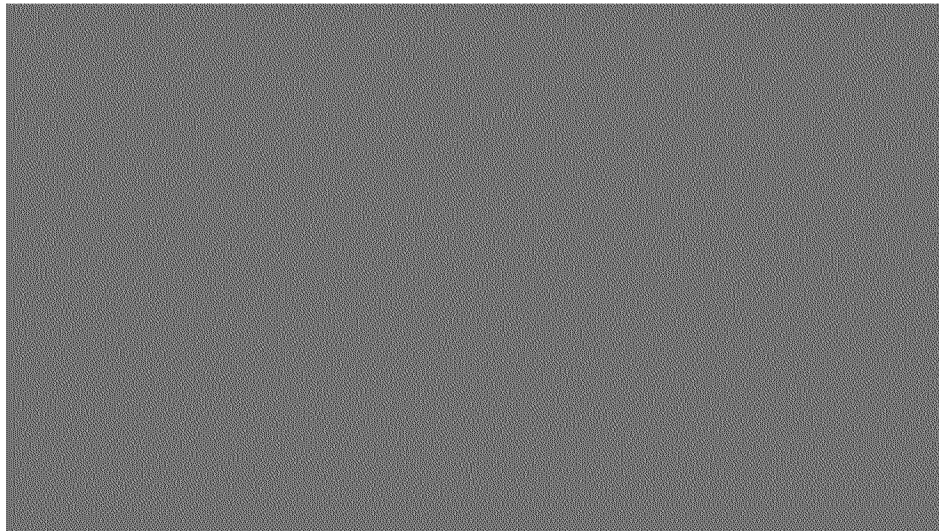
From: Hannah Arkin <hannah@resolutionenvironmental.com>

Sent: Tuesday, March 3, 2026 4:17:28 PM

To: Chris Huntley <Chuntley@aspenerg.com>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Cc: Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Jamison Miner <JMiner@aspenerg.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>

Subject: Re: Meeting request for Soda Mountain- question about changes to project description



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Hi Chris,

No, we are not adding the stormwater basins back in. What document did you see this referenced in? I can docket a correction.

Hannah

Hannah Arkin

CEO

Resolution Environmental

www.resolutionenvironmental.com

262 B Avenue, Coronado, CA 92118

760-504-4109

From: Chris Huntley <Chuntley@aspenerg.com>

Sent: Tuesday, March 3, 2026 3:50 PM

To: Hannah Arkin <hannah@resolutionenvironmental.com>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Cc: Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Jamison Miner <JMiner@aspenerg.com>; Chang,

Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>

Subject: Re: Meeting request for Soda Mountain- question about changes to project description

Hannah,

As soon as possible is needed. But perhaps you can let me know if you have added back the stormwater basins for the current project.

Best regards,

Chris



Chris Huntley
Executive Vice President
Director of Biological Resources
Office: (818) 338-6714 | Cell: (818) 292-2327
www.aspeneg.com

Agoura Hills | San Francisco | Sacramento | Inland Empire | Palm Springs

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From: Hannah Arkin <hannah@resolutionenvironmental.com>

Sent: Tuesday, March 3, 2026 3:47 PM

To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Cc: Chris Huntley <Chuntley@aspeneg.com>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Jamison Miner <JMiner@aspeneg.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; eric.knight@energy.ca.gov <Eric.Knight@energy.ca.gov>

Subject: Re: Meeting request for Soda Mountain- question about changes to project description

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Hi Lisa,

SMSP02853

Would any of these days/times work for your team?

3/6: 8-4

3/9: 1-5

3/10: 8-3

Thanks!

Hannah

Hannah Arkin

CEO

Resolution Environmental

www.resolutionenvironmental.com

262 B Avenue, Coronado, CA 92118

760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Sent: Tuesday, March 3, 2026 3:32 PM

To: Hannah Arkin <hannah@resolutionenvironmental.com>

Cc: Chris Huntley <chuntley@aspeneg.com>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Jamison Miner <jminer@aspeneg.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>

Subject: Meeting request for Soda Mountain- question about changes to project description

Hi Hannah,

Our biology staff need to meet with you to make sure they understand the project description changes that appear based on your comments submitted on the Staff Assessment. It appears that stormwater basins are being added into the project.

Can you provide days and times of your availability for this week and beginning of next week.

Thanks,

Lisa Worrall

Senior Environmental Planner

CEQA Project Management Unit

Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814

1-916-661-8367

California Energy Commission

Website: www.energy.ca.gov



From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 3/6/2026 12:51:46 AM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Fw: [EXT] Fw: Meeting request for Soda Mountain- question about changes to project description
Attachments: SodaMountainTRWEV2.gdb.zip

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Hi Lisa,

Attached are the GIS files.

Can we do the meeting tomorrow at 11:30am?

Thanks!

Hannah Arkin
CEO
Resolution Environmental
www.resolutionenvironmental.com
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Marlyng Gama <mgama@rinconconsultants.com>
Sent: Thursday, March 5, 2026 4:11 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>; David Daitch <ddaitch@rinconconsultants.com>
Subject: Re: [EXT] Fw: Meeting request for Soda Mountain- question about changes to project description

Hi Hannah,

GIS Files attached.

Thanks.



Marlyng Gama
Supervising Biologist
mgama@rinconconsultants.com
805-644-4455 Main | 805-880-0514 Direct

From: Marlyng Gama <mgama@rinconconsultants.com>
Sent: Thursday, March 5, 2026 11:01 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>; David Daitch <ddaitch@rinconconsultants.com>
Subject: Re: [EXT] Fw: Meeting request for Soda Mountain- question about changes to project description

I'll get working with GIS. We will send shortly

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From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Thursday, March 5, 2026 10:09:40 AM
To: Marlyng Gama <mgama@rinconconsultants.com>; David Daitch <ddaitch@rinconconsultants.com>
Subject: [EXT] Fw: Meeting request for Soda Mountain- question about changes to project description

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Hi! Please see below from CEC, could you send me the GIS files to transmit to them?

Thanks!

Hannah Arkin
CEO
Resolution Environmental
<https://resolutionenvironmental.com/>
148 H Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, March 5, 2026 10:03 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Meeting request for Soda Mountain- question about changes to project description

Hi Hannah,

I am checking with staff to make sure nothing else needs to be put into the docket. I would like to add the new berm and channel that are added to protect the switchyard and BESS to the two alternative figures. Can you send me the GIS files so we can update our two figures.

Thanks,

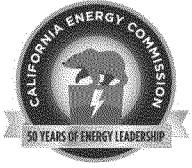
Lisa

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission

Website: www.energy.ca.gov



From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 3/6/2026 12:58:17 AM
To: Hannah Arkin [hannah@resolutionenvironmental.com]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Chris Huntley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=018948a34a3149c4a3833144594ae8b3-ff2eee5c-df]; Crisp, Ann@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b89c4de7ece742679d19e1e3ee713dc2-Crisp, Ann@]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]; Mehdizadeh, Ghazal@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0207161ebf3643bc9b4eae17357e98d8-6c221257-8d]
CC: Tory Walker [Tory@trwengineering.com]; May Lau [mlau@rinconconsultants.com]; Emily Gaston [egaston@rinconconsultants.com]
Subject: Soda Mountain new stormwater infrastructure
Location: Microsoft Teams Meeting
Start: 3/6/2026 7:30:00 PM
End: 3/6/2026 8:30:00 PM
Show Time As: Busy
Recurrence: (none)
Required Attendees: Hannah Arkin; Chang, Kaycee@Energy; Chris Huntley; Crisp, Ann@Energy; Abulaban, Abdel-Karim@Energy;
Optional Attendees: Ackerman, James@Energy; Mehdizadeh, Ghazal@Energy
Attendees: Tory Walker; May Lau; Emily Gaston

We will meet with the applicant to discuss our questions about the filings recently docketed (updated hydrology and biology reports).

We want to make sure we fully understand what is being proposed.

Microsoft Teams meeting

Join:

<https://teams.microsoft.com/meet/25489458676990?p=xsbnOKo7wMoc2cBZJp>

Meeting ID: 254 894 586 769 90

Passcode: RC2FW7pS

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Phone conference ID: 283 643 675#

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

From: Bohan, Drew@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7DD07A25FCBC49B0BBB219CC3B788983-BOHAN, DREW]
Sent: 3/10/2026 6:49:00 PM
Subject: Hold: Soda Mountain Briefing
Start: 3/18/2026 9:30:00 PM
End: 3/18/2026 9:55:00 PM
Show Time As: Busy
Recurrence: (none)