

**DOCKETED**

<b>Docket Number:</b>	79-AFC-04C
<b>Project Title:</b>	Compliance - Application for Certification of DWR Bottlerock Geothermal Project
<b>TN #:</b>	269538
<b>Document Title:</b>	DATA REQUESTS – Set No 9 – Transportation
<b>Description:</b>	DATA REQUESTS – SET No. 9 – Transportation
<b>Filer:</b>	Anwar Ali
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
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April 20, 2026

Brady Olson  
Chief Executive Officer  
Open Mountain Energy  
3451 N Triumph Blvd STE 201  
Lehi, Utah 84043

**Data Requests Set No. 9 - Bottle Rock Geothermal Power Plant (79-AFC-04C)**

Dear Brady Olson:

The California Energy Commission (CEC) staff is asking for the information specified in the enclosed Data Requests which is necessary for the staff analysis of the Bottle Rock Geothermal Power Plant petition to amend (PTA) (TN # 262318). The Mayacma Geothermal, LLC, proposes to construct and operate a 7.5-megawatt (MW) Binary Geothermal Power Plant within the Bottle Rock Power Plant (BRPP) site.

These Data Requests seek further information in the areas of Project Description and the operational profiles for both the proposed 7.5 MW Binary project as well as the CEC-licensed 55 MW BRPP, based on the information provided in the PTA.

To assist CEC staff in timely completing its environmental review and to meet the requirements of CEQA (see Cal. Code Regs., tit. 14, §§ 15108, 15109), the CEC staff is requesting responses to the data requests within 30 days. If you are unable to provide the information requested or need to revise the timeline, please let me know within 10 days of receipt of this letter.

**DATA REQUESTS – SET NO. 9 – TRANSPORTATION  
BOTTLE ROCK GEOTHERMAL POWER PLANT (79-AFC-04C)**

If you have any questions, please email me at [anwar.ali@energy.ca.gov](mailto:anwar.ali@energy.ca.gov).

*Anwar Ali*

Anwar Ali, Ph.D.

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Enclosure: Data Requests Set No. 9 - Transportation.

## DATA REQUESTS – SET NO. 9 – TRANSPORTATION

### BOTTLE ROCK GEOTHERMAL POWER PLANT (79-AFC-04C)

#### Technical Area: Transportation

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**BACKGROUND:** Codified in Public Resources Code Section 21099, SB 743 required changes to the CEQA Guidelines (Cal. Code Regs., Title 14, Div. 6, Ch. 3, § 15000 et seq.) regarding the analysis of transportation impacts. SB 743 required the Governor’s Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) as the metric for evaluating transportation/traffic impacts. Under the new transportation guidelines, LOS (or vehicle delay) is no longer considered an environmental impact under CEQA. Amendments to the CEQA Guidelines required under SB 743 were approved on December 28, 2018, and the new Section 15064.3 identifies VMT (vehicle miles traveled) as the most appropriate measure of transportation impacts under CEQA, effective July 1, 2020.

The CEQA guidelines are not specific on whether to include or exclude construction traffic and the issue has not been specifically cited in any legal opinions. There is only one reference to “construction” in the State’s April 2018 VMT Guidelines: “GHGs can be further reduced at the Project level through implementing energy-efficient construction and travel demand management approaches.” This suggests that construction-related VMT is of interest to the State. Given that the traffic generation from the project would be mostly during the construction phase, CEC staff concludes it is appropriate to examine the VMT during construction.

Section 15064.3, subdivision (a), states, “For the purposes of this section, ‘vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project. Here, the term ‘automobile’ refers to on-road passenger vehicles, specifically cars and light trucks.” Based upon the above considerations, the VMT analysis should evaluate worker, not truck, trips to/from the site during the construction phase.

Tables 2.3-1 and 2.3-2 in the PTA provide helpful information regarding the construction schedule and the number of average daily one-way trips generated by each construction phase. However, the origin of the construction traffic and approximate miles traveled to and from the site, and hence the VMT generated by the project, is unknown.

# **DATA REQUESTS – SET NO. 9 – TRANSPORTATION BOTTLE ROCK GEOTHERMAL POWER PLANT (79-AFC-04C)**

## **DATA REQUESTS**

1. Please provide a VMT analysis for car and light truck traffic generated by construction. Please note that if the project generates less than 1,393 VMT per day, the project may be presumed to have a less than significant VMT impact, according to the "Senate Bill 743 Vehicle Miles Traveled Regional Baseline Study" prepared for the Lake Area Planning Council.