

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-OPT-03
<b>Project Title:</b>	Soda Mountain Solar
<b>TN #:</b>	258896
<b>Document Title:</b>	Determination of Incomplete Application and Request for Information for the Soda Mountain Solar Project (24-OPT-03)
<b>Description:</b>	N/A
<b>Filer:</b>	Ann Crisp
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	9/3/2024 4:44:23 PM
<b>Docketed Date:</b>	9/3/2024



**CALIFORNIA  
ENERGY COMMISSION**



September 3, 2024

Hannah Gbeh  
Chief Executive Officer  
Resolution Environmental  
262 B. Avenue  
Coronado, California 92118

## **Determination of Incomplete Application and Request for Information for the Soda Mountain Solar Project (24-OPT-03)**

Dear Hannah Gbeh,

California Energy Commission (CEC) staff confirmed receipt on August 1, 2024, of an Opt-In Application for the Soda Mountain Solar Project (project) (24-OPT-03). Soda Mountain Solar, LLC ("Applicant"), proposes to construct, operate, and maintain a utility-scale solar photovoltaic (PV) electrical generating and storage facility and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid.

The Soda Mountain Solar Project would generate up to 300 megawatts (MW) of renewable energy and include up to 300 MW of battery storage. The project also includes decommissioning, which is anticipated to occur after 30 years of operation. The project is located on approximately 2,670 acres of land administered by the U.S. Bureau of Land Management.

The project components are as follows:

- A solar plant site including all facilities that create a footprint in and around the field of solar panels, including the solar field consisting of solar power arrays, operation and maintenance buildings and structures, stormwater infrastructure, and related infrastructure.
- A substation, switchyard, and 500-kilovolt (kV) generation tie line (gen-tie) for interconnection to the existing Marketplace-Adelanto 500-kV transmission line operated by the Los Angeles Department of Water and Power. The 500-kV gen-tie would be located within an existing Caltrans culvert and require boring under Interstate 15.
- A lithium-ion battery energy storage system of up to 300 MW storage capacity across 18 acres.

The CEC staff has finished its review of the project application pursuant to California Code of Regulations, title 20, section 1877, which specifies the required contents of an application and Public Resources Code, section 25545.4(a), which states, "within 30 days of the submission of the application, the commission shall review the application and make a determination of completeness." Based on this review, staff has determined the submitted application is incomplete.

Under Public Resources Code, section 25545.4 (b), the CEC staff requests the information described in the attachments to this letter. The attachments consist of (1) data completeness worksheets listing the requirements specified in statute and regulations, and (2) requests for additional information needed for staff to complete its environmental analysis of the proposed project, which includes input from partner agencies who have a memorandum of understanding with the CEC to perform a related review for opt-in applications. Staff's review of the application has identified some initial topics of concern that could impact the project: water supply, stormwater management, and migration of desert bighorn sheep. These concerns are fully described in the attached data requests.

All requested information is reasonably necessary to prepare an Environmental Impact Report as part of a CEC Staff Assessment and to support a decision on the application, including all the findings required in Chapter 6.2 of Division 15 of the Public Resources Code sections 25545 et seq.

Staff asks the applicant to file complete responses by technical area to the requested data in as few submittals as possible and provide an estimated timeline of when the remaining data will be submitted. Staff asks that upon submitting complete responses, the applicant provide a statement that its response to the request for information is complete and addresses all identified deficiencies.

Consistent with Public Resources Code, section 25545.4(c)(2) and California Code of Regulations, title 20, section 1878, upon receipt of all information responsive to this request, CEC staff will finalize review of the information provided and document its determination regarding application completeness in a subsequent letter.

If you have any questions about the information identified as necessary to complete the application, please email the CEQA project manager, Lisa Worrall, at [lisa.worrall@energy.ca.gov](mailto:lisa.worrall@energy.ca.gov).

Sincerely,



Drew Bohan, Executive Director

#### Attachments

Attachment A: Data Completeness Worksheets for Title 20, section 1877

Attachment B: Data Requests

# **Attachment A**

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Data Completeness Worksheets  
for Title 20, section 1877

# Soda Mountain Solar Project (24-OPT-03)

## Completeness Review

### Incomplete

1. Mandatory Opt-in Requirements
2. Air Quality (includes Greenhouse Gases)
3. Alternatives
4. Biological Resources
5. Cultural/Tribal Cultural Resources
6. Executive Summary
7. Geological Hazards
8. Hazardous Materials Handling
9. Land Use
10. Paleontological Resources
11. Project Description
12. Public Health
13. Socioeconomics
14. Soils
15. Traffic and Transportation
16. Transmission System Safety and Nuisance
17. Transmission System Design
18. Visual Resources
19. Waste Management
20. Water Resources
21. Worker Safety

### Complete

1. Efficiency, Energy, and Energy Resources
2. Facility Design
3. Noise and Vibration
4. Reliability
5. Wildfire

**DATA COMPLETENESS WORKSHEET**

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 Technical Area: **Mandatory Opt-In Requirements** Project: Soda Mountain Solar Project Technical Staff: Various  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

OPT-IN STATUTES/ REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
<b>AUTHORITY AND VERIFICATION</b>				
Cal. Code Regs., tit. 20 § 1707	Every notice and application shall be dated and signed by the applicant attesting under penalty of perjury to its truth and accuracy.	Chapter 0 Application and Data Responses	Yes	
<b>"FACILITY" OR "DISCRETIONARY PROJECT" DEFINITION MET</b>				
	Explanation of how the facility meets one or more of the definitions of "facility":	--	--	--
Cal. Code Regs., tit. 20, § 1877(b); Pub. Resources Code, § 25545(b)(4)	If the opt-in application is seeking certification for a discretionary project pursuant to Public Resources Code section 25545(b)(4), the application shall contain a detailed description of how the facility meets the criteria specified in section 25545(b)(4) including, as applicable, what the facility would manufacture, produce, or assemble, and how the facility's products or services would be used in the manufacture, production, or assembly of (1) energy storage systems or component manufacturing, (2) wind systems or component manufacturing, (3) solar photovoltaic energy systems or component manufacturing, or (4) specialized products, components, or systems that are integral to renewable energy or energy storage technology.	Appendix V, Section 1.0, p. 1	Yes	
<b>REQUIREMENTS FOR COVERED PROJECT UNDER THE LABOR CODE</b>				

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Cal. Code Regs., tit. 20, § 1877(c)	Certifications required by Public Resources Code sections 25545.3.3 and 25545.3.5.	Appendix T, pp. 1-3	Yes	
Pub. Resources Code, § 25545.3.3	Certification that the applicant will meet the requirements of a covered project and the commission shall make the requirements a condition of certification. Include the applicant's certification that either of the following is true:	--	--	--
Pub. Resources Code, § app25545.3.3(a)	The entirety of the construction of the covered project is a public work.	N/A	N/A	N/A
Pub. Resources Code, § 25545.3.3(b)	The construction of the covered project is not in its entirety a public work for which prevailing wages must be paid, but all construction workers employed on the project will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, pursuant the Labor Code sections 1773 and 1773.9, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. For portions of the project that are not a public work, all of the following:	--	--	--

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Pub. Resources Code, § 25545.3.3(b)(1)	Applicant ensures that the prevailing wage requirement is included in all contracts for the performance of all construction work.	Appendix T, p. 1	Yes	
Pub. Resources Code, § 25545.3.3(b)(2)	Contractors and subcontractors must pay all construction workers employed in the construction of the project at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.	Appendix T, p. 1	Yes	
Pub. Resources Code, § 25545.3.3(b)(3)	Contractors and subcontractors performing construction work on the project shall employ apprentices at no less than the ratio required in the Labor Code section 1777.5.	Appendix T, p. 1	Yes	
Pub. Resources Code, § 25545.3.3(b)(4)	Except as provided in (b)(6), all contractors and subcontractors performing construction work shall maintain and verify payroll records pursuant the Labor Code section 1776, make those records available for inspection and copying, and furnish those payroll records to the Labor Commissioner pursuant to the Labor Code section 1771.4.	Appendix T, p. 1	Yes	



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Pub. Resources Code, § 25545.3.3(b)(5)	Except as provided in (b)(6), the pay prevailing wage provisions listed within this section may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to the Labor Code sections 1741, 1742, 1771.2, and 1742.1.	Appendix T, p. 1	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)	Paragraphs (b)(4) and (b)(5) do not apply if all contractors and subcontractors performing construction work on the project are subject to a project labor agreement. The project labor agreement shall include, but not be limited to, the following:	--	--	--
Pub. Resources Code, § 25545.3.3(b)(6)(A)	Provisions requiring payment of prevailing wages to all construction workers employed in the construction of the project and for enforcement of that obligation through an arbitration procedure.	Appendix T, p. 2	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(B)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a relevant local agency.	Appendix T, p. 2	Yes	

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Pub. Resources Code, § 25545.3.3(b)(6)(C)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix T, p. 2	Yes	
Pub. Resources Code, § 25545.3.3(b)(6)(D)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix T, p. 2	Yes	
Pub. Resources Code, § 25545.3.5	Certify that a skilled and trained workforce will be used to perform all construction work on the project and all of the following apply:	--	--	--
Pub. Resources Code, § 25545.3.5(a)	Require in all contracts for the performance of work that every contractor and subcontractor at every tier will individually use a skilled and trained workforce to construct the project.	Appendix T, p. 2	Yes	
Pub. Resources Code, § 25545.3.5(b)	Every contractor and subcontractor must use a skilled and trained workforce to construct the project.	Appendix T, p. 2	Yes	

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 Project Manager:   Lisa Worrall   Docket:   24-OPT-03   Technical Senior:   Eric Knight  

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Pub. Resources Code, § 25545.3.5(c)	Except as provided in (e), contractors and subcontractors that fail to use a skilled and trained workforce shall be subject to the penalties provided in the Public Contract Code section 2603.	Appendix T, p. 2	Yes	
Pub. Resources Code, § 25545.3.5(d)	Except as provided in (e), the applicant must retain records, including copies of monthly reports, that demonstrate compliance with the Public Contract Code section 2600 while the project or contract is being performed and for three years after completion of the project or contract. The applicant must submit these records immediately upon request of the commission. When submitted to the commission, these records shall be a public record under the California Public Records Act and shall be open to public inspection.	Appendix T, p. 2	Yes	
Pub. Resources Code, § 25545.3.5(e)	(c) and (d) do not apply if all contractors and subcontractors performing work on the project are subject to a project labor agreement. The project labor agreement shall also include, but not be limited to, all of the following:	--	--	--
Pub. Resources Code, § 25545.3.5(e)(1)	Provisions requiring compliance with the skilled and trained workforce requirement and for enforcement of that obligation through an arbitration procedure.	Appendix T, p. 2	Yes	

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Pub. Resources Code, § 25545.3.5(e)(2)	Targeted hiring provisions, including a targeted hiring plan, on a craft-by-craft basis to address job access for local, disadvantaged, or underrepresented workers, as defined by a local agency.	Appendix T, p. 2	Yes	
Pub. Resources Code, § 25545.3.5(e)(3)	Apprenticeship utilization provisions that commit all parties to increasing the share of work performed by state-registered apprentices above the state-mandated minimum ratio required in the Labor Code section 1777.5.	Appendix T, p. 2	Yes	
Pub. Resources Code, § 25545.3.5(e)(4)	Apprenticeship utilization provisions that commit all parties to hiring and retaining a certain percentage of state-registered apprentices that have completed the Multi-Craft Core pre-apprenticeship training curriculum referenced in the Unemployment Insurance Code section 14005(t).	Appendix T, p. 2	Yes	
<b>PERMIT APPLICATIONS SUBMITTED (LOCAL, STATE, AND FEDERAL)</b>				

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Cal. Code Regs., tit. 20, § 1877(d)	A discussion of whether the applicant has submitted any local, state, or federal permit applications. For any required permit that has not yet been submitted to the relevant state agency, include a plan for submitting the application and any discussions that have occurred with the state agency with authority over the project.	Appendix V, Section 2.1, pp. 2 to 6	No	See DR AQ-1, DR WATER-8, and DR WATER-24
<b>IDENTIFICATION OF WHETHER SITE IS LOCATED AT A PROHIBITED AREA</b>				
Cal. Code Regs., tit. 20, § 1877(e)	Identify whether the project is, on a prohibited site as identified in Public Resources Code section 25527 or on a site designated by the California Coastal Commission under Public Resources Code section 30413(b) or on a site designated by the San Francisco Bay Conservation and Development Commission under Government Code section 66645(b). Include documentation of the approval of the public agency having ownership or control of the land.	Appendix V, Section 2.1, pp. 7 to 8	Yes	
<b>NET POSITIVE ECONOMIC BENEFIT TO THE LOCAL GOVERNMENT</b>				

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Cal. Code Regs., tit. 20, § 1877(f)	Identify preliminary information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility, consistent with Public Resources Code section 25545.9. Staff must provide the submitted information to the local government for review and comment.	Subsection 2.3, p. 2-1; Appendix P, pp. 15 to 23	No	See DR MAND-1
Cal. Code Regs., tit. 20 § 1879(a)(7); Pub. Resources Code § 25545.9	... economic benefits may include, but are not limited to the following: (a) Employment growth. (b) Housing development. (c) Infrastructure and environmental improvements. (d) Assistance to public schools and education. (e) Assistance to public safety agencies and departments. (f) Property taxes and sales and use tax revenues.	Subsection 2.3, p. 2-1; Appendix P, pp. 15-23	No	See DR MAND-1
<b>LEGALLY BINDING ENFORCEABLE AGREEMENT(S) FOR COMMUNITY BENEFITS OF THE PROJECT</b>				

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Cal. Code Regs., tit. 2, § 1877(g)	Discussion of applicant's plan or strategy, including a timeline for execution, to obtain legally binding and enforceable agreement(s) with, or that benefit, a coalition of one or more community-based organizations prior to project certification, consistent with Public Resources Code section 25545.10.	Appendix S	Yes	
<b>ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT REQUIREMENTS</b>				
Cal. Code Regs., tit. 20, § 1877(h)	A discussion of whether the project meets the requirements of Public Resources Code sections 21183 and 21183.6.	Appendix V, Section 4.0, pp. 8 to 13	Yes	
Pub. Resources Code § 21183(a)	The project will result in a minimum investment of \$100,000,000 in California upon completion.	Appendix V, Section 4.1, p. 8; Appendix P, pp. 1 to 42	Yes	
Pub. Resources Code § 21183(b)	The project creates high-wage, highly skilled jobs that pay prevailing wages and living wages, provides construction jobs and permanent jobs for Californians, helps reduce unemployment, and promotes apprenticeship training.	Appendix V, Section 4.2, p. 8 to 9; Appendix P, pp. 1 to 42	Yes	

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Pub. Resources Code § 21183(c)	For a project described in Public Resources Code Section 21180(b)(1), (2), and (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles, the project does not result in any net additional emission of greenhouse gases, including greenhouse gas emissions from employee transportation. A project is deemed to meet the requirements of this paragraph if the applicant demonstrates compliance with Public Resources Code section 21183.6.	N/A	N/A	N/A
Pub. Resources Code § 21183(d)	Demonstrates compliance with the requirements of recycling commercial solid waste and organic solid waste as required under Public Resources Code sections 42649 and 42649.8.	Appendix V, Section 4.4, p. 12; Appendix R	Yes	



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Pub. Resources Code § 21183(e)	Applicant entered into a binding and enforceable agreement that all mitigation measures required to certify the project under this chapter shall be conditions of approval of the project, and those conditions will be fully enforceable by the lead agency or another agency designated by the lead agency. In the case of environmental mitigation measures, the applicant agrees, that those measures will be monitored and enforced by the lead agency for the life of the obligation.	Appendix V, Section 4.5, p. 13, Attachment 1	Yes	
Pub. Resources Code § 21183(f)	Applicant agrees to pay the costs of the trial court and the court of appeal in hearing and deciding any case challenging a lead agency's action on a certified project under this division...	Appendix V, Section 4.5, p. 13, Attachment 1	Yes	
Pub. Resources Code § 21183(g)	Applicant agrees to pay the costs of preparing the record of proceedings for the project concurrent with review and consideration of the project under this division...	Appendix V, Section 4.5, p. 13, Attachment 1	Yes	
Pub. Resources Code § 21183(h)	For a project for which environmental review has commenced, the applicant demonstrates that the record of proceedings is being prepared in accordance with Public Resources section 21186.	Appendix V, Section 4.6, p. 13, Attachment 2	Yes	

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Pub. Resources Code § 21183.6(a)	The quantification and mitigation of the greenhouse gas emission impacts of a project described in 21180(b)(1), (2), or (3), including a wind or solar energy project or a project that manufactures products, equipment, or components used for renewable energy generation, energy efficiency, or to produce clean alternative fuel vehicles must be as follows:	--	--	
Pub. Resources Code § 21183.6(a)(1)	The environmental baseline for greenhouse gas emissions must be established based upon the physical environmental conditions in the vicinity of the project site at the time the application is submitted.	Appendix V, pp. 9 to 12	Yes	

<p>Pub. Resources Code § 21183.6(a)(2)</p>	<p>Demonstrate that the mitigation of the impacts resulting from the emissions of greenhouse gases are achieved in the following priority:</p> <ol style="list-style-type: none"> <li>1. Direct emissions reductions from the project that also reduce emissions of criteria air pollutants or toxic air contaminants through implementation of project features, project design, or other measures, including, but not limited to, energy efficiency, installation of renewable energy electricity generation, and reductions in vehicle miles traveled.</li> <li>2. The remaining unmitigated impacts shall be mitigated by direct emissions reductions that also reduce emissions of criteria air pollutants or toxic air contaminants within the same air pollution control district or air quality management district in which the project is located.</li> <li>3. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate within the same air pollution control district or air quality management district in which the project is located. The offsets shall be undertaken in a manner consistent with the Health and Safety Code section 38500, including, but not limited to, the requirement that the offsets be real, permanent, quantifiable, verifiable, and enforceable, and shall be undertaken from sources in the community in which the project is located or in adjacent communities.</li> </ol>	<p>Appendix V, pp. 9 to 12</p>	<p>Yes</p>	
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	4. The remaining unmitigated impacts shall be mitigated through the use of offsets that originate from sources that provide a specific, quantifiable, and direct environmental and public health benefit to the region in which the project is located.			

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: **Air Quality**  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Technical Staff: Record  
 Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3-3, Subsection 3.3.3.2, pp. 3.3-23 to 3.3-34	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 3-3, Subsection 3.3.3.2, Table. 3.3-6, Subsection 3.3.3.6, pp. 3.3-29 to 3.3-34	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 3-3, Subsection 3.3.6, pp. 3.3-35 to 3.3-36	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: Air Quality

Project: Soda Mountain Solar Project

Technical Staff: Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 3-3, Subsection 3.3.5, pp. 3.3-34 to 3.3-35; Section 3.8 Subsection 3.8.2.2, pp 3.8-8 to 3.8-9, Table 3.8-2; Appendix C, Section 3.3, Section 6.3	No	See DR AQ-4, DR AQ-6 and DR GHG-1 to DR GHG-5
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	Section 3-3, Subsection 3.3.2, p. 3.3-13	No	See DR AQ-3
Appendix B (g) (8) (B)	The heating value and chemical characteristics of the proposed fuels, the stack height and diameter, the exhaust velocity and temperature, the heat rate and the expected capacity factor of the proposed facility.	Section 3-3, Subsection 3.3.3.3, p. 3.3-27	Yes	
Appendix B (g) (8) (C)	A description of the control technologies proposed to limit the emission of criteria pollutants.	Appendix C, Subsection 7.1 and Subsection 7.4	Yes	

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Technical Area: **Air Quality** Project: Soda Mountain Solar Project

Technical Staff: Record

Project Manager: Lisa Worrall Docket: 24-OPT-03

Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (8) (D)	A description of the cooling system, the estimated cooling tower drift rate, the rate of water flow through the cooling tower, and the maximum concentrations of total dissolved solids.	N/A	N/A	N/A
Appendix B (g) (8) (E)	The emission rates of criteria pollutants and greenhouse gases (CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, and SF <sub>6</sub> ) from the stack, cooling towers, fuels and materials handling processes, delivery and storage systems, and from all on-site secondary emission sources.	Section 3-3, Subsection 3.3.3.6, p. 3.3-30, Table 3.3-7, Subsection 3.3.3.6, p. 3.3-31, Table 3.3-8; Section 3-8 Subsection 3.8.3.4 pp. 3.8-10 to 3.8-12, Table 3.8-3 to Table 3.8-5; Appendix C, Section 3.3, and 6.3, Table 12 and 13, pp. 19 to 21	No	See DR GHG-4 and DR GHG-5
Appendix B (g) (8) (F)(i)	A description of typical operational modes, and start-up and shutdown modes for the proposed project, including the estimated frequency of occurrence and duration of each mode, and estimated emission rate for each criteria pollutant during each mode.	Section 3-8, Subsection 3.8.3.4, pp. 3.8-10 to 3.8-12, Table 3.8-3 to 3.8-5; Appendix C, Section 6.2, p. 41	No	See DR GHG-6 and DR GHG-7
Appendix B (g) (8) (F)(ii)	A description of the project's planned initial commissioning phase, which is the phase between the first firing of emissions sources and the commercial operations date, including the types and durations of equipment tests, criteria pollutant emissions, and monitoring techniques to be used during such tests.	N/A	N/A	N/A

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Appendix B (g) (8) (G)	The ambient concentrations of all criteria pollutants for the previous three years as measured at the three Air Resources Board certified monitoring stations located closest to the project site, and an analysis of whether this data is representative of conditions at the project site. The applicant may substitute an explanation as to why information from one, two, or all stations is either not available or unnecessary.	Appendix C, Table 3, p. 31, Table 4, pp. 31 to 32, Table 5, p. 32	No	See DR AQ-2
Appendix B (g) (8) (H)	One year of meteorological data collected from either the Federal Aviation Administration Class 1 station nearest to the project or from the project site, or meteorological data approved by the California Air Resources Board or the local air pollution control district.	Appendix C, Attachment A (from Appendix C), pp. 142 to 151	Yes	
Appendix B (g) (8) (H) (i)	If the data is collected from the project site, the applicant shall demonstrate compliance with the requirements of the U.S. Environmental Protection Agency document entitled "On-Site Meteorological Program Guidance for Regulatory Modeling Applications" (EPA - 450/4-87-013 (August 1995)), which is incorporated by reference in its entirety.	Appendix C, Attachment B (from Appendix C), pp. 133 to 135	Yes	



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Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Technical Staff: Record  
 Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (8) (H) (ii)	The data shall include quarterly wind tables and wind roses, ambient temperatures, relative humidity, stability and mixing heights, upper atmospheric air data, and an analysis of whether this data is representative of conditions at the project site.	Appendix C, Attachment A (from Appendix C), pp. 142 to 151	Yes	
Appendix B (g) (8) (I)	An evaluation of the project’s direct and cumulative air quality impacts, consisting of:	--	--	--
Appendix B (g) (8) (I) (i)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant impacts of project construction activities on ambient air quality conditions, including fugitive dust (PM <sub>10</sub> ) emissions from grading, excavation and site disturbance, as well as the combustion emissions [nitrogen oxides (NO <sub>x</sub> ), sulfur dioxide (SO <sub>2</sub> ), carbon monoxide (CO), and particulate matter less than 10 microns in diameter (PM <sub>10</sub> ) and particulate matter less than 2.5 microns in diameter (PM <sub>2.5</sub> ) from construction-related equipment;	Section 3-3, Subsection 3.3.3.6, Table 3.3-7, p. 3.3-30	No	See DR AQ-4

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Technical Staff: Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes

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Appendix B (g) (8) (I) (ii)	A screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of the direct criteria pollutant (NO <sub>x</sub> , SO <sub>2</sub> , CO, PM <sub>10</sub> , and PM <sub>2.5</sub> ) impacts on ambient air quality conditions of the project during typical (normal) operation, and during shutdown and startup modes of operation. Identify and include in the modeling of each operating mode the estimated maximum emissions rates and the assumed meteorological conditions;	Section 3-3, Subsection 3.3.3.6, Table 3.3-8, p. 3.3-31	No	See DR AQ-4
Appendix B (g) (8) (I) (iii)	A protocol for a cumulative air quality modeling impacts analysis of the project's typical operating mode in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. The cumulative inert pollutant impact analysis should assess whether estimated emissions concentrations will cause or contribute to a violation of any ambient air quality standard; and	Section 3-3, Subsection 3.3.5, pp. 3.3-34 to 3.3-35	No	See DR AQ-6
Appendix B (g) (8) (I) (iv)	An air dispersion modeling analysis of the impacts of the initial commissioning phase emissions on state and federal ambient air quality standards for NO <sub>x</sub> , SO <sub>2</sub> , CO, PM <sub>10</sub> , and PM <sub>2.5</sub> .	Appendix C, Attachment B (from Appendix C), Table 1, p. 137, Attachment C (from Appendix C), pp. 153 to 165	No	See DR AQ-4 to DR AQ-5

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Revision No. 0 Date: September 2024

Technical Area: **Air Quality**

Project: Soda Mountain Solar Project

Technical Staff: Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (8) (J)	If an emission offset strategy is proposed to mitigate the project's impacts under (g)(1), provide the following information:	--	--	--
Appendix B (g) (8) (J) (i)	The quantity of offsets or emission reductions that are needed to satisfy air permitting requirements of local permitting agencies (such as the air district), state and federal oversight air agencies, and the California Energy Commission. Identify by criteria air pollutant, and if appropriate, greenhouse gas; and	Appendix C, Subsection 7.2, pp. 59 to 67	Yes	
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions;	Appendix C, Table 10, p. 61, Table 11, pp. 61 to 62, Table 12, p. 65	Yes	
Appendix B (g) (8) (K)	A detailed description of the mitigation, if any, which an applicant may propose, for all projects impacts from criteria pollutants that currently exceed state or federal ambient air quality standards but are not subject to offset requirements under the district's new source review rule.	Section 3.3, Subsection 3.3.4, p. 3.3-34	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly	Section 3-3, subsection 3.3.1, Table 3.3-1, pp. 3.3-1 to 3.3-13	No	See DR GHG-1 to DR GHG-3

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Revision No. 0 Date: September 2024

Technical Area: **Air Quality**  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Technical Staff: Record  
 Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 3.3, Subsection 3.3.2, p. 3.3-13	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Section 3.3, Subsection 3.3.2, p. 3.3-13	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 3.3, Subsection 3.3.2, p. 3.3-13	No	See DR AQ-1

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Alternatives** Project:

Soda Mountain Solar Project

Technical Staff: John Carrier

Project Manager: Lisa Worrall Docket:

24-OPT-03

Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (f) (1)	A discussion of the range of reasonable alternatives to the project, or to the location of the project, including the no project alternative, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and an evaluation of the comparative merits of the alternatives. In accordance with Public Resources Code section 25540.6(b), a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site.	Chapter 4, pp. 4-1 to 4-6	No	See DR ALT-1, DR ALT-2, and DR ALT-3
Appendix B (f) (2)	An evaluation of the comparative engineering, economic, and environmental merits of the alternatives discussed in (f)(1).	Chapter 4, pp. 4-1 to 4-6	Yes	

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Completeness: Complete  Incomplete  Revision No. 0 Date: September 2024  
 Technical Area: Biological Resources Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Section 3.4, Subsection 3.4.1.2, p. 3.4-5, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, p. 3.4-13 to 3.4-16; Subsection 3.4.4, Table 6, Subsection 3.4.4.4, pp. 3.4-34, 3.4-38, Subsection 3.4.5, pp. 3.4-45 to 3.4-46; Appendix D1, Section 3.1.2, pp. 17 to 18	No	See DR BIO-1 to DR BIO-18
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 3.4, Subsection 3.4.1.2, p. 3.4-5, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, pp. 3.4-13 to 3.4-16, Section 3.4.4.4, p. 3.4-34, 3.4-38, Section 3.4.5, p. 3.4-45 to 3.4-46; Appendix D1, Section 3.1.2, pp. 17 to 18	No	See DR BIO-1 to DR BIO-18
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Section 3.4	Yes	
[OPT-IN ONLY] Cal. Code Regs., tit. 20, § 1877 (a)	If the applicant is seeking incidental take authorization as described in California Fish and Game Code section 2081(b), the application shall include the information required in California Code of Regulations, title 14, section	Section 3.4, Section 3.4.3.5, pp. 3.4-13 to 3.4-14	No	See DR BIO -3, DR-BIO-4, DR BIO-8, and DR BIO-9

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 Technical Area: Biological Resources Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	783.2(a)(1)-(a)(10). If the applicant is seeking lake and streambed alteration authorization under Fish and Game Code section 1602, the application shall include the information required in California Fish and Game Code section 1602(a)(1)(A)-(F).			
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 3.4, Subsection 3.4.1.2, p. 3.4-5, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, p. 3.4-13 to 3.4-16, Subsection 3.4.4.4, pp. 3.4-34, 3.4-38, Subsection 3.4.4, Table 6, Subsection 3.4.5, pp. 3.4-45 to 3.4-46; Appendix D1, Section 3.1.2, pp. 17 to 18	No	See DR BIO-1 to DR BIO-18

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete    Incomplete   **X**   Revision No.   0   Date:   September 2024    
 Technical Area:   **Biological Resources**   Project:   Soda Mountain Solar Project   Technical Staff:   C. Huntley, J. Miner, J. Wood/ CDFW    
 Project Manager:   Lisa Worrall   Docket:   24-OPT-03   Technical Senior:   Eric Knight  

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (13) (A)	A regional overview and discussion of terrestrial and aquatic biological resources, with particular attention to sensitive biological resources within 10 miles of the project. In the discussion include a list of the USGS topographic quadrangle(s) utilized to search records from the California Natural Diversity Database (CNDDDB), and a citation which includes the date the CNDDDB was accessed. Include a map at a scale of 1:6,000 (under confidential cover) and at 1:350,000 (for public) showing sensitive biological resource location(s) in relation to the project site and related facilities and any boundaries of a local Habitat Conservation Plan or similar open space land use plan or designation. Label the biological resources and survey areas as well as the project facilities. Sensitive biological resources include:	Section 3.4	Yes	
Appendix B (g) (13) (A) (i)	species listed under state or federal Endangered Species Acts;	Section 3.4, Subsection 3.4.3.5	No	See DR BIO-8
Appendix B (g) (13) (A) (ii)	species receiving consideration during environmental review under	Section 3.4, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12,	No	See DR BIO-2, DR BIO-3a, b, and c, DR BIO-5, DR BIO-7, and DR BIO-9



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 Technical Area: Biological Resources Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	CEQA Guidelines 14 CCR Section 15380;	Subsection 3.4.3.5, pp. 3.4-14 to 3.4-16		
Appendix B (g) (13) (A) (iii)	species identified as state Fully Protected;	Section 3.4, Subsection 3.4.3.5	No	See DR BIO-9
Appendix B (g) (13) (A) (iv)	species covered by Migratory Bird Treaty Act;	Section 3.4, Section 3.4.3.5, p. 3.4-15	No	See DR BIO-6
Appendix B (g) (13) (A) (v)	species and habitats identified by local, state, and federal agencies as needing protection, including but not limited to those identified by the CNDDDB, California Fish and Game Code, Title 14 of the California Code of Regulations, or where applicable, in Local Coastal Programs or in relevant decisions of the California Coastal Commission or other responsible agency;	Section 3.4, Subsection 3.4.1.2 p. 3.4-5, Section 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, pp. 3.4-13 to 3.4-16, Subsection 3.4.4, Table 6, Subsection 3.4.4.4, p. 3.4-38, Subsection 3.4.5, pp. 3.4-45 to 3.4-46; Appendix D1, Section 3.1.2, pp. 17 to 18	No	See DR BIO-1 to DR BIO-18
Appendix B (g) (13) (A) (vi)	locally significant species that are rare or uncommon in a local context such as county or region or is so designated in local or regional plans, policies, or ordinances;	Section 3.4	Yes	
Appendix B (g) (13) (A) (vii)	plant species listed as rare under the California Native Plant Protection Act;	Section 3.4, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12	No	See DR BIO-2
Appendix B (g) (13) (A) (viii)	established native resident or migratory wildlife corridors or wildlife nursery sites.	Section 3.4	Yes	

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Appendix B (g) (13) (B)	Include a list of the species and habitat(s) observed and those with a potential to occur within 1 mile of the project site and 1,000 feet from the outer edge of linear facility corridors.  Maps or aerial photographs shall include the following:	Section 3.4, Section 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5	No	See DR BIO-2, DR BIO-8, and DR BIO-9
Appendix B (g) (13) (B) (i)	Detailed maps at a scale of 1:6,000 or color aerial photographs taken at a recommended scale of 1-inch equals 500 feet (1:6,000) with a 30 percent overlap (provided under confidential cover) and 1:350,000 (for public viewing) that show the proposed project site and related facilities, biological resources including, but not limited to, those found during project-related field surveys and in records from the CNDDDB, and the associated areas where biological surveys were conducted. Label the biological resources and survey areas as well as the project facilities.	Section 3.4	Yes	
Appendix B (g) (13) (B) (ii)	Provide an aerial map of the isopleth graphic depicting modeled nitrogen deposition rates. The		No	See DR AQ-6 and DR BIO-19

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	geographical extent of the nitrogen deposition map(s) should include the entire plume and a radius of 6 (six) miles from the source, specifically identifying acres of sensitive habitat(s) within each isopleth Modeling parameters and files shall be provided.			
Appendix B (g) (13) (B) (iii)	An aerial photo depicting state and federal jurisdictional features including state waters and wetlands delineated on maps at a scale of (1:2,400) showing any potential jurisdictional features delineated out to 250 feet from the edge of disturbance if wetlands occur within 250 feet of the project site and/or related facilities that would be included with the U.S. Army Corps of Engineers Section 404 Permit application, Regional Water Quality Control Board (RWQCB) application, or California Department of Fish and Wildlife Section 1600 et seq. permit requirements. For projects proposed to be located within the coastal zone, also provide aerial photographs or maps as described above that identify wetlands as	Section 3.4	Yes	

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 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	defined by the Coastal Act and under the jurisdiction of the California Coastal Commission.			
Appendix B (g) (13) (B) (iv)	Provide Geographic Information System (GIS) data (shape and/or geodatabase files) for all data mapped for biological resources.	Section 3.4	Yes	
Appendix B (g) (13) (C)	A discussion of the biological resources at the proposed project site and related facilities. Related facilities include, but are not limited to, laydown and parking areas, gas and water supply pipelines, transmission lines, and roads. The discussion shall address the distribution of vegetation community types, denning or nesting sites, population concentrations, migration corridors, breeding habitats, and other appropriate biological resources including the following:	Section 3.4, Subsection 3.4.1.2, p. 3.4-5, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, pp. 3.4-13 to 3.4-16, Subsection 3.4.4, Table 6, Subsection 3.4.4.4, pp. 3.4-34, 3.4-38, Subsection 3.4.5, pp. 3.4-45 to 3.4-46; Appendix D1, Section 3.1.2, pp. 17 to 18	No	See DR BIO-1 to DR BIO-18
Appendix B (g) (13) (C) (i)	A list of sensitive species and habitats with a potential to occur (defined in (A) above) and include status (state, federal, California Native Plant Society, global rank, state rank, etc.)	Section 3.4, Section 3.4.3.4, pp. 3.4-11 and 3.4-12	No	See DR BIO-2, DR BIO-3a, b, c, DR BIO-8, and DR BIO-9

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X** Revision No. 0 Date: September 2024  
 Technical Area: **Biological Resources** Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (13) (C) (iii)	Perform nitrogen deposition modeling including the complete citation for references used in determining deposition rates and location. Specify the amount of total annual nitrogen deposition in kilograms of nitrogen per hectare per year (kg N/ha/yr) in special status species habitats and vegetation types for wet and dry deposition. Describe habitat and species potentially affected.		No	See DR AQ-6 and DR BIO-19
Appendix B (g) (13) (D)	A description and results of all field studies and specialized surveys (e.g., focused and protocol) used to provide biological baseline information about the project site and associated facilities. Include copies of the CNDDDB records and field survey forms completed by the applicant’s biologist(s). Identify the date(s) the surveys were completed, methods used to complete the surveys, and the name(s) and qualifications of the biologists conducting the surveys. Include:	Section 3.4	Yes	
Appendix B (g) (13) (D) (i)	Current biological resources surveys conducted using appropriate field	Section 3.4, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, 3.4-14	No	See DR BIO-2, DR BIO-3a, b, c, and DR BIO-5

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 Technical Area: Biological Resources Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW  
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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	survey protocols (include references) during the appropriate season(s). State and federal agencies with jurisdiction shall be consulted for field survey protocol guidance prior to surveys if a protocol exists.			
Appendix B (g) (13) (D) (ii)	If the project or any related facilities could impact federal or state jurisdictional wetland, provide completed Army Corps of Engineers wetland delineation forms or determination of wetland status pursuant to Coastal Act or CDFW requirements, as applicable to the location, name(s) and qualifications of biologist(s) completing the delineation, the results of the delineation and a table showing jurisdictional features including state waters and wetland acreage amounts to be impacted.	Section 3.4, Subsection 3.4.3.5, Subsection 3.4.4.4, p. 3.4-38	No	See DR BIO-10 and DR BIO-13

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 Technical Area: Biological Resources Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (13) (E))	Impacts discussion of all impacts (direct, indirect, and cumulative) to biological resources from project site preparation, construction activities, plant operation, maintenance, closure, and decommissioning. Discussion shall also address sensitive species habitat impacts from air emissions (i.e., nitrogen deposition);	Section 3.4, Subsection 3.4.3.4, pp. 3.4-11 to 3.4-12, Subsection 3.4.3.5, pp. 3.4-14, and 3.4-16; Appendix D1, Section 4.4.2.4.2 p. 65	No	See DR BIO-2, DR BIO-3a, b, c, DR BIO-5, DR BIO-7, DR BIO-8, DR BIO-9, DR BIO-13 and DR BIO-19
Appendix B (g) (13) (F)	A discussion of all feasible mitigation measures and an evaluation of their anticipated efficacy in reducing the level of impacts, including, but not limited to the following:	Section 3.4, Subsection 3.4.3.5, pp. 3.4-14, 3.4-16, Section 3.4.4.4, p. 3.4-38; Appendix D1, Section 4.4.2.4.2	No	See DR BIO-3a, b, c, DR BIO-8, DR BIO-9, and DR BIO-13
Appendix B (g) (13) (F) (i)	All measures proposed to avoid and/or reduce adverse impacts to biological resources.	Section 3.4, Section 3.4.3.5, p. 3.4-13	No	See DR BIO-3c, DR BIO-4, DR BIO-8, DR BIO-9, and DR BIO-13
Appendix B (g) (13) (F) (ii)	All off-site habitat mitigation such as habitat improvement or compensation including management, and an identification of appropriate agency contacts for coordination and verification of proposed habitat mitigation measures.	Section 3.4	Yes	
Appendix B (g) (13) (F) (iii)	Educational programs to enhance employee awareness during	Section 3.4	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**      Revision No.   0   Date: September 2024  
 Technical Area: **Biological Resources** Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	construction and operation to protect biological resources.			
Appendix B (g) (13) (G)	A discussion of compliance and monitoring programs to ensure the effectiveness of impact avoidance and mitigation measures incorporated into the project.	Section 3.4	Yes	
Appendix B (g) (13) (H)	Submit copies of any preliminary correspondence between the project applicant and state and federal resource agencies regarding whether federal or state permits from other agencies such as the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the U.S. Army Corps of Engineers, the CDFW, and the RWQCB will be required for the proposed project.	.	No	See DR BIO-12 and DR BIO-13
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during	Section 3.4	Yes	



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 Technical Area: **Biological Resources** Project: Soda Mountain Solar Project Technical Staff: C. Huntley, J. Miner, J. Wood/ CDFW  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Section 3.4	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Table 2-1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix V, Table 2-1	Yes	

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Revision No. 0 Date: September 2024

**Cultural Resources and**

L. DeOliveira, R. Hatheway, M.

Technical Area: **Tribal Cultural Resources** Project: Soda Mountain Solar Project

Technical Staff: Hoke

Project Manager: Lisa Worrall Docket: 24-OPT-02

Technical Senior: Gabriel Roark

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document;	Section 3.5, p. 3.5-12, pp. 3.5-15 to 3.5-22, 3.5-25 to 3.5-28; Section 3.18 pp. 3.18-1, 3.18-10 to 3.18-12	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.5.4, pp. 3.5-15 to 3.5-17, Subsection 3.5.5, pp. 3.5-17 to 3.5-25; Section 3.18 pp. 3.18-1, 3.18-10 to 3.18-12	No	See DR CUL/TRI-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Subsection 3.5.4, pp. 3.5-1, 3.5-7 to 3.5-17, Subsection 3.5.5, pp. 3.5-17 to 3.5-25; Subsection 3.18.6, pp. 3.18-13 to 3.18-15	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any	Subsection 3.4, pp. 3-3 to 3-7; Subsection 3.5.2.1, pp. 3.5-7 to 3.5-8, Subsection 3.5.6.2, pp. 3.5-25 to 3.5-26, Subsection 3.5.6.3, pp. 3.5-26 to 3.5-28, Subsection 3.5.8, p. 3.5-28; Subsection 3.18.3.3, pp. 3.18-11 to 3.18-12; Confidential 2009 Cultural Resources Inventory, p. 1	No	See DR CUL/TRI-2

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**Cultural Resources and**

L. DeOliveira, R. Hatheway, M.

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Technical Staff: Hoke

Project Manager: Lisa Worrall Docket: 24-OPT-02

Technical Senior: Gabriel Roark

	monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (2)	Cultural resources and tribal cultural resources together comprise objects, buildings, structures, sites, features, areas, places, records, sacred places, cultural landscapes, or manuscripts, all of which may have significance according to criteria outlined in sections 21074 and 21084.2 of the Public Resources Code.	N/A	N/A	N/A
Appendix B (g) (2) (A)	A summary of the ethnology, prehistory, and history of the region with emphasis on the area within no more than a 5-mile radius of the project location. This regional summary must address the potential for buried cultural resources and tribal cultural resources to occur in the project area. The summary, together with literature search results, must inform the field methods employed	Section 3.5, pp. 3.5-8 to 3.5-14; Section 3.18, pp. 3.18-3 to 3.18-10; Appendix F (Confidential), pp. 5 to 7	No	See DR CUL/TRI-3

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**Cultural Resources and**

L. DeOliveira, R. Hatheway, M.

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Technical Staff: Hoke

Project Manager: Lisa Worrall Docket: 24-OPT-02

Technical Senior: Gabriel Roark

	for identifying cultural resources and tribal cultural resources in the project area.			
Appendix B (g) (2) (B)	<p>The results of a literature search to identify cultural resources and tribal cultural resources within an area not less than a 1-mile radius around the project site and not less than one-quarter (0.25) mile on each side of the linear facilities. Identify any cultural resources or tribal cultural resources listed pursuant to ordinance by a city or county or recognized by any local historical or archaeological society or museum. Literature searches to identify the above cultural resources and tribal cultural resources must be completed by, or under the direction of, individuals who meet the Secretary of the Interior’s Professional Standards for the technical area addressed.</p> <p>Copies of California Department of Parks and Recreation (DPR) 523 forms (Title 14 CCR §4853) shall be provided for all cultural resources and tribal cultural resources (ethnographic, architectural, historical, and archaeological)</p>	Subsection 3.5.5.1, pp. 3.5-17 to 3.5-24; Appendix F (Confidential), Archaeological Resource Assessment, pp. 21 to 28; Appendix G (Confidential), Historical Resources Assessment, pp. 23 to 27	No	See DR CUL/TRI-4, DR CUL/TRI-5, and DR CUL/TRI-6

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**Cultural Resources and**

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Technical Staff: Hoke

Project Manager: Lisa Worrall Docket: 24-OPT-02

Technical Senior: Gabriel Roark

	<p>identified in the literature search as being 45 years or older or of exceptional importance as defined in the National Register Bulletin Guidelines, (36CFR60.4(g)). A copy of the USGS 7.5-minute quadrangle map of the literature search area delineating the areas of all past surveys and noting the California Historical Resources Information System (CHRIS) identifying number shall be provided. Copies also shall be provided of all technical reports whose survey coverage is wholly or partly within 0.25 mile of the area surveyed for the project under section (g)(2)(C), or which report on any archaeological excavations or architectural surveys within the literature search area.</p>			
<p>Appendix B (g) (2) (C)</p>	<p>The results of new cultural resource and tribal resource surveys or surveys less than 5 years old shall be provided if survey records of the area potentially affected by the project are more than 5 years old. Surveys to identify new cultural resources and tribal cultural resources must be completed by (or under the direction of) individuals who meet the Secretary</p>	<p>Subsection 3.5.4, pp. 3.5-15 to 3.5-17, Subsection 3.5.5, pp. 3.5-17 to 3.5-25; Section 3.18, pp. 1 to 12</p>	<p>No</p>	<p>See DR CUL/TRI-7 and DR CUL/TRI-8</p>

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Revision No. 0 Date: September 2024

**Cultural Resources and**

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Technical Area: **Tribal Cultural Resources** Project: Soda Mountain Solar Project

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Project Manager: Lisa Worrall Docket: 24-OPT-02

Technical Senior: Gabriel Roark

	<p>of the Interior’s Professional Standards for the technical area addressed.</p> <p>New pedestrian archaeological surveys shall be conducted inclusive of the project site and project linear facility routes, extending to no less than 200 feet around the project site, substations and staging areas, and to no less than 50 feet to either side of the right-of-way of project linear facility routes.</p> <p>New historic architecture field surveys in rural areas shall be conducted inclusive of the project site and the project linear facility routes, extending no less than 0.5 mile out from the proposed plant site and from the routes of all above-ground linear facilities. New historic architecture field surveys in urban and suburban areas shall be conducted inclusive of the project site, extending no less than one parcel’s distance from all proposed plant site boundaries. New historic architecture field reconnaissance (“windshield survey”) in urban and</p>			
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**Cultural Resources and**

L. DeOliveira, R. Hatheway, M.

Technical Area: **Tribal Cultural Resources** Project: Soda Mountain Solar Project

Technical Staff: Hoke

Project Manager: Lisa Worrall Docket: 24-OPT-02

Technical Senior: Gabriel Roark

	<p>suburban areas shall be conducted along the routes of all linear facilities to identify, inventory, and characterize structures and districts that appear to be older than 45 years or that are exceptionally significant, whatever their age.</p> <p>A technical report of the results of the new surveys, conforming to the Archaeological Resource Management Report format (CA Office of Historic Preservation Feb 1990), which is incorporated by reference in its entirety, shall be separately provided and submitted (under confidential cover if archaeological resource or other sensitive resource locations are included).</p> <p>Information included in the technical report shall also be provided in the application, other sensitive resources, or areas of religious significance) shall be submitted under a request for confidentiality pursuant to California Code of Regulations, title 20, section 2501 et seq.</p>			
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**Cultural Resources and**

L. DeOliveira, R. Hatheway, M.

Technical Area: **Tribal Cultural Resources** Project: Soda Mountain Solar Project

Technical Staff: Hoke

Project Manager: Lisa Worrall Docket: 24-OPT-02

Technical Senior: Gabriel Roark

	At a minimum, the technical report shall include:			
Appendix B (g) (2) (C) (i)	The summary from Appendix B (g)(2)(A) and the literature search results from Appendix B (g)(2)(B);	Soda Mountain Solar Reconnaissance Survey Report 2024 (Confidential); Soda Mountain Solar HRA 2024 (Confidential)	No	See DR CUL/TRI-9
Appendix B (g) (2) (C) (ii)	The survey procedures and methodology used to identify cultural and tribal cultural resources and a discussion of the cultural and tribal resources identified by the survey;	Soda Mountain Solar Reconnaissance Survey Report 2024 (Confidential); Soda Mountain Solar HRA 2024 (Confidential)	No	See DR CUL/TRI-7 and DR CUL/TRI-8
Appendix B (g) (2) (C) (iii)	Copies of all new and updated DPR 523(A) forms. If a cultural resource or tribal cultural resource may be impacted by the project, also include the appropriate DPR 523 detail form for each such resource;	Confidential Soda Mountain Solar Reconnaissance Survey Report 2024 (Confidential) Soda Mountain Solar HRA 2024 (Confidential)	No	See DR CUL/TRI-10 to DR CUL/TRI-13
Appendix B (g) (2) (C) (iv)	A map at a scale of 1:24,000 (U.S. Geological Survey topographic quadrangle) depicting the locations of all previously known and newly identified cultural and tribal cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii); and	Soda Mountain Solar Reconnaissance Survey Report 2024 (Confidential); Soda Mountain Solar HRA 2024 (Confidential)	No	See DR CUL/TRI-14
Appendix B (g) (2) (C) (v)	The names and qualifications of the cultural resources specialists who contributed to and were responsible	Soda Mountain Solar Reconnaissance Survey Report 2024 (Confidential);	No	See DR CUL/TRI-15



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Technical Staff: Hoke

Project Manager: Lisa Worrall Docket: 24-OPT-02

Technical Senior: Gabriel Roark

	for literature searches, surveys, and preparation of the technical report.	Soda Mountain Solar HRA 2024 (Confidential)		
Appendix B (g) (2) (D) (i)	A copy of the applicant's request to the Native American Heritage Commission (NAHC) for information on Native American sacred sites and lists of Native Americans interested in the project vicinity, and copies of any correspondence received from the NAHC.	Subsection 3.5.5.2, p. 24; Section 3.18, pp. 1 to 12	No	See DR CUL/TRI-16
Appendix B (g) (2) (D) (ii)	A copy of all correspondence sent to Native American individuals and groups listed by the NAHC and copies of all responses. Notification to Native Americans shall include a project description and map.	Appendix F, appendix C pp C-1 to C-3 (Confidential)	No	See DR CUL/TRI-17
Appendix B (g) (2) (D) (iii)	A written summary of any oral responses.	Subsection 3.5.5.2, p. 24; Section 3.18, pp. 3.18-1 to 3.18-12	No	See DR CUL/TRI-18
Appendix B (g) (2) (E)	Include in the discussion of proposed mitigation measures required by (g)(1):	--	--	--
Appendix B (g) (2) (E) (i)	A discussion of measures proposed to mitigate project impacts to known cultural and tribal cultural resources;	Subsection 3.5.6.2, pp. 3.5-25 to 3.5-26, Subsection 3.5.6.3, pp. 3.5-26 to 3.5-28; Subsection 3.18.4, p. 12	No	See DR CUL/TRI-19
Appendix B (g) (2) (E) (ii)	A set of contingency measures proposed to mitigate potential impacts to previously unknown cultural and tribal cultural resources	Subsection 3.5.6.2, pp. 3.5-25 to 3.5-26, Subsection 3.5.6.3, pp. 3.5-26 to 3.5-28; Subsection 3.18.4, p. 3.18-12	No	See DR CUL/TRI-19

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Revision No. 0 Date: September 2024

**Cultural Resources and**

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Technical Area: **Tribal Cultural Resources** Project: Soda Mountain Solar Project

Technical Staff: Hoke

Project Manager: Lisa Worrall Docket: 24-OPT-02

Technical Senior: Gabriel Roark

	and any unanticipated impacts to known cultural or tribal cultural resources; and			
Appendix B (g) (2) (E) (iii)	Educational programs to enhance employee awareness during construction and operation to protect cultural and tribal cultural resources.	Subsection 3.5.6.2, pp. 3.5-25 to 3.5-26, Subsection 3.5.6.3, pp. 3.5-26 to 3.5-28; Subsection 3.18.4, p. 3.18-12	No	See DR CUL/TRI 20
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.5.6.2, pp. 3.5-25 to 3.5-26, Subsection 3.5.6.3, pp. 3.5-26 to 3.5-28; Subsection 3.18.1, pp. 3.18-1 to 3.18-3, Appendix V, Table 2-1, and Table 2-2.	No	See DR CUL/TRI-21
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the	Subsection 3.5.6.2, pp. 3.5-25 to 3.5-26, Subsection 3.5.6.3, pp. 3.5-26 to 3.5-28; Subsection 3.18.1 pp. 3.18-1 to 3.18-3, Appendix V, Table 2-1	Yes	

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Revision No. 0 Date: September 2024

**Cultural Resources and**

L. DeOliveira, R. Hatheway, M.

Technical Area: **Tribal Cultural Resources** Project: Soda Mountain Solar Project

Technical Staff: Hoke

Project Manager: Lisa Worrall Docket: 24-OPT-02

Technical Senior: Gabriel Roark

	Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Subsection 3.5.6.2, pp. 3.5-25 to 3.5-26, Subsection 3.5.6.3, pp. 3.5-26 to 3.5-28; Subsection 3.18.1, pp. 3.18-1 to 3.18-3, Appendix V, Table 2-1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Subsection 3.5.6.2, pp. 3.5-25 to 3.5-26, Subsection 3.5.6.3, pp. 3.5-26 to 3.5-28; Subsection 3.18.1, pp. 3.18-1 to 3.18-3, Appendix V, Table 2-1	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: **Efficiency, Energy and Energy Resources**

Project: Soda Mountain Solar Project

Technical Staff: Ardalan Raisi Sofi

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Shahab Khoshmashrab

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Appendix A1, p. 5	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (4) (A)	Heat and mass balance diagrams for design conditions for each mode of operation.	N/A	N/A	N/A
Appendix B (h) (4) (B)	Annual fuel consumption in BTUs for each mode of operation, including hot restarts and cold starts.	Subsection 3.3.3.3, p. 3.3-27; Subsection 3.6.3.4, pp. 3.6-5 to 3.6-6; Subsection 5.3.1, p. 5-2; Appendix A1, p. 5	Yes	
Appendix B (h) (4) (C)	Annual net electrical energy produced in MWh for each mode of operation including starts and shutdowns.	Appendix A1, pp. 4 to 5	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: **Efficiency, Energy and Energy Resources**

Project: Soda Mountain Solar Project

Technical Staff: Ardalan Raisi Sofi

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Shahab Khoshmashrab

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (h) (4) (D)	Number of hours the plant will be operated in each design condition in each year.	Appendix A1, pp. 4 to 5	Yes	
Appendix B (h) (4) (E)	If the project will be a cogeneration facility, calculations showing compliance with applicable efficiency and operating standards.	N/A	N/A	N/A
Appendix B (h) (4) (F)	A discussion of alternative generating technologies available for the project, including the projected efficiency of each, and an explanation why the chosen equipment was selected over these alternatives.	Section 4, pp. 4-1 to 4-6; Appendix A1, pp. 1 to 5	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	N/A	N/A	N/A
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations,	N/A	N/A	N/A

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No.   0   Date: September 2024

Technical Area: **Efficiency, Energy and Energy Resources**

Project: Soda Mountain Solar Project

Technical Staff: Ardalan Raisi Sofi

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Executive Summary**

Project: Soda Mountain Solar Project

Technical Staff: Lisa Worrall

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (4)	Each principal subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation.	Section 6; Appendix V, Table 2-2, pp. 6 to 7	Yes	
Appendix B (a) (1) (A)	A general description of the proposed site and related facilities, including the location of the site or transmission routes, the type, size and capacity of the generating or transmission facilities, fuel characteristics, fuel supply routes and facilities, water supply routes and facilities, pollution control systems, and other general characteristics.	Subsection 2.2, pp. 2-1 to 2-8, Subsection 2.4, pp. 2-9 to 2-17	Yes	
Appendix B (a) (1) (B)	Identification of the location of the proposed site and related facilities by section, township, range, county, and assessor's parcel numbers.	Subsection 1.3, p. 1-8; Subsection 2.3, p. 2-1; Appendix N	Yes	
Appendix B (a) (1) (C)	A description of and maps depicting the region, the vicinity, and the site and its immediate surroundings.	Subsection 2.3, p.2-1, Figure 2-2, p. 2-4	No	See DR ES-1
Appendix B (a) (1) (D)	A full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction.	Subsection 2.3.1.1, Figure 2-4, p. 2-6, Figure 2-8, p. 2-12	No	See DR ES-2
Appendix B (a) (1) (E)	In an appendix to the application, a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1000 feet of the proposed powerplant and related facilities. Provide the direct mailing addresses for the owners and occupants of properties contiguous to the proposed power plant,	Appendix N	No	See DR ES-3

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Executive Summary**

Project: Soda Mountain Solar Project

Technical Staff: Lisa Worrall

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	related facilities, transmission lines, or other linear facilities as shown on the latest equalized assessment roll. Provide a map showing the parcels in the notice area.			
Appendix B (a) (2)	Project Schedule: Proposed dates of initiation and completion of construction, initial start-up, and full-scale operation of the proposed facilities.	Subsection 2.5, pp. 2-17 to 2-20, Subsection 2.6, p. 2-22	No	See DR ES-4
Appendix B (a) (3) (A)	A list of all owners and operators of the site(s), the power plant facilities, and, if applicable, thermal host, the geothermal leasehold, the geothermal resource conveyance lines, and the geothermal re-injection system, and a description of their legal interest in these facilities.	Subsection 1.6, p. 1-2	Yes	
Appendix B (a) (3) (B)	A list of all owners and operators of the proposed electric transmission facilities.	Subsection 1.6, p. 1-2	Yes	
Appendix B (a) (3) (C)	A description of the legal relationship between the applicant and each of the persons or entities specified in (a)(3)(A) and (B).	Subsection 1.6, p. 1-2	Yes	



**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete \_\_\_\_\_  
 Technical Area: Facility Design  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No. 0 Date: September 2024  
 Technical Staff: Kenneth Salyphone  
 Technical Senior: Shahab Khoshmashrab

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Appendix A1, Subsections 1.1 to 1.4, pp. 1 to 5	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Appendix A1, Subsections 1.1 to 1.4, pp. 1 to 5	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (1) (A)	A description of the site conditions and investigations or studies conducted to determine the site conditions used as the basis for developing design criteria. The descriptions shall include, but not be limited to, seismic and other geologic hazards, adverse conditions that could affect the project’s foundation, adverse meteorological and climatic conditions, and flooding hazards, if applicable.	Appendix A1, Subsection 1.1.1, pp. 1 to 2	Yes	
Appendix B (h) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.	Appendix A1, Subsection 1.1.2, p. 2	Yes	
Appendix B (h) (1) (C)	A description of the proposed foundation types, design criteria (including derivation), analytical techniques, assumptions, loading conditions, and loading combinations to be used in the design of facility structures and major mechanical and electrical equipment.	Appendix A1, Subsection 1.1.3, pp. 2 to 3	Yes	
Appendix B (h) (1) (D)	For each of the following facilities or systems, provide a description including drawings,	Subsection 2.4, pp. 2-9 to 2-17, Figures 2-6 and 2-7;	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete   
 Technical Area: Facility Design  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No. 0 Date: September 2024  
 Technical Staff: Kenneth Salyphone  
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	dimensions, surface-area requirements, typical operating data, and performance and design criteria for protection from impacts due to adverse site conditions:	Appendix A3, Figures C-201 to C-209, C-300 to C-309, C-400, C-501 to C-503		
Appendix B (h) (1) (D) (i)	The power generation system;	Subsection 2.4, p. 2-9, Subsection 2.4.1.1, p. 2-13	Yes	
Appendix B (h) (1) (D) (ii)	The heat dissipation system;	Subsection 2.4.3.2, p.2-14	Yes	
Appendix B (h) (1) (D) (iii)	The cooling water supply system, and, where applicable, pre-plant treatment procedures;	N/A	N/A	N/A
Appendix B (h) (1) (D) (iv)	The atmospheric emission control system;	N/A	N/A	N/A
Appendix B (h) (1) (D) (v)	The waste disposal system and on-site disposal sites;	Subsection 2.4.7, p. 2-16	Yes	
Appendix B (h) (1) (D) (vi)	The noise emission abatement system;	Section 3.13, pp. 3.13-1 to 3.13-28	Yes	
Appendix B (h) (1) (D) (vii)	The geothermal resource conveyance and re-injection lines (if applicable);	N/A	N/A	N/A
Appendix B (h) (1) (D) (viii)	Switchyards/transformer systems; and	Subsection 2.4.2, p. 2-13	Yes	
Appendix B (h) (1) (D) (ix)	Other significant facilities, structures, or system components proposed by the applicant.	Subsection 2.4.4, pp. 2-14 to 2-16	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard	N/A	N/A	N/A

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete \_\_\_\_\_  
 Technical Area: Facility Design  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No. 0 Date: September 2024  
 Technical Staff: Kenneth Salyphone  
 Technical Senior: Shahab Khoshmashrab

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	N/A	N/A	N/A
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**  
 Technical Area: **Geological Hazards**  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No. 0 Date: September 2024  
 Technical Staff: James Ackerman  
 Technical Senior: Abdel-Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.7.3, pp. 3.7-15 to 3.7-28, Subsection 3.7.5, p. 3.7-28, Subsection 3.7.5.1, pp. 3.7-28 to 3.7-29	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.7.2.1, pp. 3.7-6 to 3.7-7, Section 3.7.2.2, p. 3.7-8, Subsection 3.7.2.3, pp. 3.7-13 to 3.7-15	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 3.7.6, pp. 3.7-30 to 3.7-32	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Subsection 3.7.2.1, pp. 3.7-6 to 3.7-7, Subsection 3.7.2.2, p. 3.7-8, Section 3.7.2.3, pp. 3.7-13 to 3.7-15, Section 3.7.3.2, pp. 3.7-19 to 3.7-22, Subsection 3.7.3.3, pp. 3.7-23 to 3.7-28, Subsection 3.7.5.1, pp. 3.7-28 to 3.7-29	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**  
 Technical Area: **Geological Hazards**  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No. 0 Date: September 2024  
 Technical Staff: James Ackerman  
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (17) (A)	A summary of the geology, seismicity, and geologic resources of the project site and related facilities, including linear facilities.	Subsection 3.7.2.1, pp. 3.7-6 to 3.7-7, Subsection 3.7.2.2, p. 3.7-8, Table 3.7-1, p. 3.7-9, Section 3.7.2.3, pp. 3.7-12 to 3.7-15, Figure 3.7-3, p. 3.7-14, Section 3.12.2.2, pp. 3.12-6 to 3.12-7	Yes	
Appendix B (g) (17) (B)	A map at a scale of 1:24,000 and description of all recognized stratigraphic units, geologic structures, and geomorphic features within two (2) miles of the project site and along proposed facilities. Include an analysis of the likelihood of ground rupture, seismic shaking, mass wasting and slope stability, liquefaction, subsidence, tsunami runup, and expansion or collapse of soil structures at the plant site. Describe known geologic hazards along or crossing linear facilities.	Figure 3.7-1 p. 3.7-7, Subsection 3.7.2.1 pp. 3.7-6 to 3.7-7, Subsection 3.7.2.2, p. 3.7-8, Table 3.7-1, p. 3.7-9, Subsection 3.7.2.3, pp. 3.7-12 to 3.7-15, Figure 3.7-3, p. 3.7-14	Yes	
Appendix B (g) (17) (C)	A map and description of geologic resources of recreational, commercial, or scientific value which may be affected by the project. Include a discussion of the techniques used to identify and evaluate these resources.	Subsection 3.12.2.2, pp. 3.12-6 to 3.12-7	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of	Appendix V, Table 2-2, pp. 6 to 7	No	See DR-GEO-1

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**  
 Technical Area: **Geological Hazards**  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No. 0 Date: September 2024  
 Technical Staff: James Ackerman  
 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Appendix V, Table 2-1, pp. 3 to 6	No	See DR-GEO-2
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Table 2-1, pp. 3 to 6	No	See DR-GEO-2
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix V, Table 2-1, pp. 3 to 6	No	See DR-GEO-2

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: **Hazardous Materials Handling**

Project: Soda Mountain Solar Project

Technical Staff: Paul Miller, Jeffrey Harvey

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.9.3.2, pp. 3.9-17 to 30	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.9.2, pp. 3.9-11 to 3.9-12, Subsection 3.9.6, p. 3.9-31; Appendix I	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Subsections 3.9.1 to 3.9.7, pp. 3.9-1 to 3.9-30	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete      Incomplete **X**

Revision No.   0   Date: September 2024

Technical Area: **Hazardous Materials Handling**

Project: Soda Mountain Solar Project

Technical Staff: Paul Miller, Jeffrey Harvey

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (10) (A)	A list of all materials used or stored on-site which are hazardous or acutely hazardous, as defined in California Code of Regulations, title 22, § 66261.20 et seq., and a discussion of the toxicity of each material.	Subsection 3.9.3.4, pp. 3.9-22 to 3.9-23, Table 3.9-1	No	See DR HAZ-1
Appendix B (g) (10) (B)	A map at a scale of 1:24,000 depicting the location of schools, hospitals, daycare facilities, and long-term health care facilities, within the area potentially affected by any release of hazardous materials.	Subsection 3.9.2.2, p. 3.9-14, Figure 3.9-1	No	See DR HAZ-2
Appendix B (g) (10) (C)	A discussion of the storage and handling system for each hazardous material used or stored at the site.	Subsection 3.9.3.3, pp. 3.9-18 to 3.9-21, Subsection 3.9.3.4, pp. 3.9-22 to 3.9-24	Yes	
Appendix B (g) (10) (D)	The protocol that will be used in modeling potential consequences of accidental releases that could result in off site impacts. Identify the model(s) to be used, a description of all input assumptions, including meteorological conditions. The results of the modeling analysis can be submitted after the application is complete.	Subsection 3.9.3.3, p. 3.9-24	Yes	
Appendix B (g) (10) (E)	A discussion of whether a risk management plan (Health and Safety Code § 25531 et seq.) will be required, and if so, the requirements that will likely be incorporated into the plan.	Subsection 3.9.1, p. 3.9-6, Subsection 3.9.3.4 pp. 3.9-22 to 3.9-24	No	See DR HAZ-3
Appendix B (g) (10) (F)	A discussion of measures proposed to reduce the risk of any release of hazardous materials.	Subsection 3.9.3.4, pp. 3.9-22 to 3.9-25	Yes	



**DATA COMPLETENESS WORKSHEET**

Completeness: Complete      Incomplete   **X**  

Revision No.   0   Date: September 2024

Technical Area: **Hazardous Materials Handling**

Project: Soda Mountain Solar Project

Technical Staff: Paul Miller, Jeffrey Harvey

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (10) (G)	A discussion of the fire and explosion risks associated with the project.	Subsection 3.9.3.4, pp. 3.9-22 to 3.9-25, pp. 3.9-27 to 3.9-28, p. 3.9-30	No	See DR HAZ-4 and DR HAZ-5
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.9.1 pp. 3.9-1 to 3.9-11; Appendix V Table 2-2, p. 6	No	See DR HAZ-6
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 3.9.2.1, pp. 3.9-4 to 3.9-9; Appendix V, Table 2-1, pp. 3 to 6	No	See DR HAZ-7
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Table 2-1, pp. 3 to 6	No	See DR HAZ-8
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be		No	See DR HAZ-9

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: **Hazardous Materials Handling**  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Technical Staff: Paul Miller, Jeffrey Harvey  
 Technical Senior: Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	obtained and the steps the applicant has taken or plans to take to obtain such permits.			

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete X

Revision No. 0 Date: September 2024

Technical Area: Land Use

Project: Soda Mountain Solar Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsections 3.3.3 to 3.3.4, pp. 3-1 to 3-2; Subsections 3.11.3 to 3.11.5, pp. 3.11-9 to 3.11-11; Subsections 3.16.3 to 3.16.5, pp. 3.16-9 to 3.16-11	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsections 3.11.3 to 3.11.5, pp. 3.11-9 to 3.11-11; Subsections 3.16.3 to 3.16.5, pp. 3.16-9 to 3.16-11	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.11.6, pp. 3.11-11 to 3.11-12; Subsection 3.16.6, pp. 3.16-12 to 3.16-13	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference	Section 3.4, pp. 3-3 to 3-7; Subsection 3.11.1.1, p. 3.11-3	No	See DR LAND-1

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete X

Revision No. 0 Date: September 2024

Technical Area: Land Use

Project: Soda Mountain Solar Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (3) (A)	A discussion of existing land uses, general plan land use designations, and current zoning districts (including any overlay districts) at the site, land uses and land use patterns within one mile of the proposed site and within one-quarter mile of any project-related linear facilities. Include:	Subsection 3.2.2, p. 3.2-6; Subsection 3.11.2, p. 3.11-6; Subsection 3.16.2, pp. 3.16-4 to 3.16-9	Yes	
Appendix B (g) (3) (A) (i)	An identification of residential, commercial, industrial, recreational, scenic, agricultural, natural resource protection, natural resource extraction, educational, religious, cultural, and historic areas, and any other area of unique land uses;	Subsection 3.2.2, p. 3.2-6; Subsection 3.11.2, p. 3.11-6; Subsection 3.16.2, pp. 3.16-4 to 3.16-9	Yes	
Appendix B (g) (3) (A) (ii)	A discussion of any recent or proposed zone changes and/or general plan amendments; noticed by an elected or appointed board, commission, or similar entity at the state or local level;	Subsection 3.11.2.5, p. 3.11-9	Yes	
Appendix B (g) (3) (A) (iii)	Identification of all discretionary reviews by public agencies initiated or completed within 18 months prior to filing the application for those changes or developments identified in subsection (g)(3)(A)(ii); and	Subsection 3.11.2.5, p. 3.11-9	Yes	
Appendix B (g) (3) (A) (iv)	Legible maps of the areas identified in subsection (g)(3)(A) potentially affected by the project, on which existing land uses, jurisdictional boundaries, general plan	Section 2.3, Figure 2-3, p. 2-5; Section 3.11, Figure 3.11-1, p. 3.11-8	No	See DR LAND-2

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete X

Revision No. 0 Date: September 2024

Technical Area: Land Use

Project: Soda Mountain Solar Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	designations, specific plan designations, and zoning have been clearly delineated.			
Appendix B (g) (3) (B)	A discussion of the compatibility of the proposed project with present and expected land uses, and conformity with any long-range land use plans and policies adopted by any federal, state, regional, or local planning agencies. The discussion shall identify the need, if any, for land use decisions by another public agency or as part of the commission’s decision that would be necessary to make the project conform to adopted federal, state, regional, or local coastal plans, land use plans, or zoning ordinances. Examples of land use decisions include general plan amendments, zoning changes, lot line adjustments, parcel mergers, subdivision maps, Agricultural Land Conservation Act contracts cancellation, and Airport Land Use Plan consistency determinations.	Subsection 3.11.1, pp. 3.11-1 to 3.11-5	No	See DR LAND-3 and DR LAND-4
Appendix B (g) (3) (C)	A discussion of the legal status of the parcel(s) on which the project is proposed. If the proposed site consists of more than one legal parcel, describe the method and timetable for merging or otherwise combining those parcels so that the proposed project, excluding linears and temporary laydown or staging area, will be	Section 2.3, Figure 2-3, p. 2-1 and p. 2-5	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete X

Revision No. 0 Date: September 2024

Technical Area: Land Use

Project: Soda Mountain Solar Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	located on a single legal parcel. The merger need not occur prior to a decision on the Application but must be completed prior to the start of construction.			
Appendix B (g) (3) (D)	A map at a scale of 1:24,000 and written description of agricultural land uses found within all areas affected by the proposed project. The description shall include:	Subsection 3.2.2, p. 3.2-6	Yes	
Appendix B (g) (3) (D) (i)	Land classifications as shown on the California Department of Conservation's Farmland Mapping and Monitoring Program's Important Farmland maps, crop types, irrigation systems, and any special cultivation practices;	Subsection 3.2.2, p. 3.2-6	Yes	
Appendix B (g) (3) (D) (ii)	Whether agricultural land affected by the project was historically classified Farmland as defined by the California Department of Conservation (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland) as specified in Public Resources Code section 21060.1; and	Subsection 3.2.2, p. 3.2-6	Yes	
Appendix B (g) (3) (D) (iii)	Direct, indirect, and cumulative effects on agricultural land uses. If the proposed site or related facilities are subject to an Agricultural Land Conservation contract, provide a written copy and a discussion of the status of the expiration or canceling of such contract.	Subsections 3.2.3 to 3.2.4, pp. 3.2-6 to 3.2-8	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete X

Revision No. 0 Date: September 2024

Technical Area: Land Use

Project: Soda Mountain Solar Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsections 3.11.1 and 3.11.2, pp. 3.11-1 to 3.11-5; Subsection 3.16.1, pp. 3.16-1 to 3.16-3; Appendix V, Table 2-2, pp. 6 to 7	No	See DR LAND-3 and DR LAND-4
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix V, Table 2-1, pp. 3 to 6	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Table 2-1, pp. 3 to 6	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has	Appendix V, Table 2-1, pp. 3 to 6	No	See DR LAND-5

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Land Use**

Project: Soda Mountain Solar Project

Technical Staff: Negar Vahidi, Tatiana Inouye

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	taken or plans to take to obtain such permits.			



**DATA COMPLETENESS WORKSHEET**

Completeness: Complete   X   Incomplete         
 Technical Area:   **Noise and Vibration**    
 Project Manager:   Lisa Worrall  

Project:   Soda Mountain Solar Project    
 Docket:   24-OPT-03  

Revision No.   0   Date:   September 2024    
 Technical Staff:   Kenneth Salyphone    
 Technical Senior:   Shahab Khoshmashrab  

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.13.2, Subsection 3.13.2.1 to 3.13.2.2, pp. 3.13-8 to 3.13-14	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.13.2, Subsection 3.13.2.1 to 3.13.2.2, pp. 3.13-8 to 3.13-14	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.13.6, p. 3.13-29	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 3.13, pp. 3.13-1 to 3.13-29	Yes	
Appendix B (g) (4) (A)	A land use map which identifies residences, hospitals, libraries, schools, places of worship, or other facilities where quiet is an important	Section 3.13, Figure 3.13-2, p. 3.13-16	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete   X   Incomplete         
 Technical Area:   **Noise and Vibration**    
 Project Manager:   Lisa Worrall  

Project:   Soda Mountain Solar Project    
 Docket:   24-OPT-03  

Revision No.   0   Date:   September 2024    
 Technical Staff:   Kenneth Salyphone    
 Technical Senior:   Shahab Khoshmashrab  

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	attribute of the environment within the area impacted by the proposed project. The area potentially impacted by the proposed project is that area where, during either construction or operation, there is a potential increase of 5 dB(A) or more, over existing background levels.			
Appendix B (g) (4) (B)	A description of the ambient noise levels at those sites identified under subsection (g)(4)(A) which the applicant believes provide a representative characterization of the ambient noise levels in the project vicinity, and a discussion of the general atmospheric conditions, including temperature, humidity, and the presence of wind and rain at the time of the measurements. The existing noise levels shall be determined by taking noise measurements for a minimum of 25 consecutive hours at a minimum of one site. Other sites may be monitored for a lesser duration at the applicant's discretion, preferably during the same 25-hour period. The results of the noise level measurements shall be reported as hourly averages in Leq (equivalent sound or noise level), Ldn (day-night sound or noise level) or CNEL (Community Noise Equivalent Level) in units of dB(A). The L <sub>10</sub> , L <sub>50</sub> , and L <sub>90</sub> values (noise levels exceeded 10 percent, 50 percent, and 90 percent of the time, respectively) shall also be reported in units of dB(A).	Section 3.13, Table 3.13-12, p. 3.13-17, Table 3.13-13, p. 3.13-18	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete   X   Incomplete \_\_\_\_\_  
 Technical Area:   Noise and Vibration    
 Project Manager:   Lisa Worrall  

Project:   Soda Mountain Solar Project    
 Docket:   24-OPT-03  

Revision No.   0   Date:   September 2024    
 Technical Staff:   Kenneth Salyphone    
 Technical Senior:   Shahab Khoshmashrab  

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (4) (C)	A description of the major noise sources of the project, including the range of noise levels and the tonal and frequency characteristics of the noise emitted.	Section 3.13, Table 3.13-14, p. 3.13-21, Table 3.13-17, p. 3.13-24; Appendix L, Table 14, p. 23	Yes	
Appendix B (g) (4) (D)	An estimate of the project noise levels, during both construction and operation, at residences, hospitals, libraries, schools, places of worship or other facilities where quiet is an important attribute of the environment, within the area impacted by the proposed project.	Section 3.13, Table 3.13-15, p. 3.13-22, Table 3.13-18, p. 3.13-25	Yes	
Appendix B (g) (4) (E)	An estimate of the project noise levels within the project site boundary during both construction and operation and the impact to the workers at the site due to the estimated noise levels.	Appendix L, Table 14, p. 23, Appendix E (from Appendix L), Figure 2, p. 2	Yes	
Appendix B (g) (4) (F)	The audible noise from existing switchyards and overhead transmission lines that would be affected by the project and estimates of the future audible noise levels that would result from existing and proposed switchyards and transmission lines. Noise levels shall be calculated at the property boundary for switchyards and at the edge of the rights-of-way for transmission lines.	Appendix E (from Appendix L), Figure 2, p. 2	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the	Subsection 3.13.1, pp. 3.13-1 to 3.13-8	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete   X   Incomplete \_\_\_\_\_  
 Technical Area:   Noise and Vibration    
 Project Manager:   Lisa Worrall  

Project:   Soda Mountain Solar Project    
 Docket:   24-OPT-03  

Revision No.   0   Date:   September 2024    
 Technical Staff:   Kenneth Salyphone    
 Technical Senior:   Shahab Khoshmashrab  

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix V, Section 2.0, Table 2-1, pp. 2 to 6	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Section 2.0, Table 2-1, pp. 2 to 6	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix V, Section 2.0, Table 2-1, pp. 2 to 6	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete  X   
 Technical Area:  Paleontological Resources   
 Project Manager:  Lisa Worrall

Project:  Soda Mountain Solar Project   
 Docket:  24-OPT-03

Revision No.  0  Date:  September 2024   
 Technical Staff:  James Ackerman   
 Technical Senior:  Abdel-Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3.7, Table 3.7-1, p. 3.7-9, Subsection 3.7.2.4, Table 3.7.3, pp. 3.7-15 to 3.7-18, Section 3.7.5.2, p. 3.7-29	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Section 3.7.2.1, pp. 3.7-6 – to 3.7-7, Subsection 3.7.2.2 p. 3.7-8, Subsection 3.7.2.4, pp. 3.7-13 – to 3.7-18	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 3.7.6, pp. 3.7-30 to 3.7-32	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Subsection 3.7.2.1, pp. 3.7-6 to 3.7-7, Subsection 3.7.2.2, pp. 3.7-8, Section 3.7.5.2, p. 3.7-29; Appendix H, pp.1 to 56.	No	See DR-PALEO-1 and DR PALEO-2

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete   
 Technical Area: **Paleontological Resources**  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No. 0 Date: September 2024  
 Technical Staff: James Ackerman  
 Technical Senior: Abdel-Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (16) (A)	Identification of the physiographic province and a brief summary of the geologic setting, formations, and stratigraphy of the project area. The size of the paleontological study area may vary depending on the depositional history of the region.	Subsection 3.7.2.1, pp. 3.7-6 – to 3.7-7, Subsection 3.7.2.2, p. 3.7-8, Subsection 3.7.5.2, p. 3.7-29, Figure 3.7-1, Table 3.7-1; Appendix H, pp. 22-29, Figure 4, p. 24	Yes	
Appendix B (g) (16) (B)	A discussion of the sensitivity of the project area described in subsection (g)(16)(A) and the presence and significance of any known paleontological localities or other paleontological resources within or adjacent to the project. Include a discussion of sensitivity for each geologic unit identified on the most recent geologic map at a scale of 1:24,000. Provide rationale as to why the sensitivity was assigned.	Section 3.7, Table 3.7-1, p. 3.7-9, Section 3.7.2.4, p. 3.7-18; Appendix H p.p. 23-30, pp. 41 to 43, Figure 5, p. 26, Figure 6, p. 31, Figure 18, p. 43, Table 2, p. 41	Yes	
Appendix B (g) (16) (C)	A summary of all local museums, literature searches and field surveys used to provide information about paleontological resources in the project area described in (g)(16)(A). Identify the dates of the surveys, methods used in completing the surveys, and the names and qualifications of the individuals conducting the surveys.	Section 3.7.2.4, p. 3.7-18; Appendix H, p. 17, pp. 21 to 22, pp. 29 to 30, Figure 6 to Figure 17, pp. 31 to 41	Yes	
Appendix B (g) (16) (D)	Information on the specific location of known palaeontologic resources, survey reports, locality records, and maps at a scale of 1:24,000, showing occurrences of fossil finds, if known, within a 1-mile radius of the project and related facilities shall be	Section 3.7, Table 3.7-1, p. 3.7-9, Section 3.7.2.4, p. 3.7-18; Appendix H, pp. 23 to 30, pp. 41 to 43, Figure 5, p. 26, Figure 6, p. 31,	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete  Revision No. 0 Date: September 2024  
 Technical Area: Paleontological Resources Project: Soda Mountain Solar Project Technical Staff: James Ackerman  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	included in a separate appendix to the Application and submitted to the Commission under a request for confidentiality, pursuant to California Code of Regulations, title 20, section 2501 et seq.	Figure 18, p. 43, Table 2, p. 41		
Appendix B (g) (16) (E)	A discussion of any educational programs proposed to enhance awareness of potential impacts to paleontological resources by employees, measures proposed for mitigation of impacts to known palaeontologic resources, and a set of contingency measures for mitigation of potential impacts to unknown paleontological resources.	Appendix H, pp. 44 to 46	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Appendix V, Table 2-2, pp. 6 to 7	No	See DR-PALEO-3
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would	Appendix V, Table 2-1, pp. 3 to 6	No	See DR PALEO-4

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete  Revision No. 0 Date: September 2024  
 Technical Area: Paleontological Resources Project: Soda Mountain Solar Project Technical Staff: James Ackerman  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Abdel-Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Table 2-1, pp. 3 to 6	No	See DR PALEO-4
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix V, Table 2-1, pp. 3 to 6	No	See DR PALEO-4



**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete   X    
 Technical Area: Project Description  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No.   0   Date: September 2024  
 Technical Staff: Lisa Worrall  
 Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (b) (1)	In a section entitled, "Generation Facility Description, Design, and Operation" provide:	--	--	
Appendix B (b) (1) (A)	Maps at a scale of 1:24,000 (1" = 2000'), (or appropriate map scale agreed to by staff) along with an identification of the dedicated leaseholds by section, township, range, county, and county assessor's parcel number, showing the proposed final locations and layout of the power plant and all related facilities;	Chapter 2, Figures 2-3, 2-5, pp. 2-5, 2-8; Appendix A2, pp. C-100 to C-109; and Appendix A3, pp. C-200 to C-209	No	See DR LAND-2 and DR BIO-15
Appendix B (b) (1) (B)	Scale plan and elevation drawings depicting the relative size and location of the power plant and all related facilities to establish the accuracy of the photo simulations required in sections (a)(1)(D) and (g)(6)(F);	Appendix A3, pp. C-200 to C-209; Appendix B, Subsection 2.2, pp. 2 to 5, and Appendix D; Appendix B	No	See DR VIS-3 and DR VIS-5
Appendix B (b) (1) (C)	A detailed description of the design, methods of construction (include depth of excavations and other ground disturbances) and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety, emergency and auxiliary systems, and fuel types and fuel use scenarios; and	Subsection 2.4, pp. 2-9 to 2-14, Subsection 2.5, Figure 2-9, pp. 2-17 to 2-22, Subsection 2.6, pp. 2-22 to 2-23	No	See DR PD-1
Appendix B (b) (1) (D)	A description of how the site and related facilities were selected, and the consideration given to engineering constraints, site geology, environmental impacts, water, waste and fuel constraints, electric transmission constraints, and other factors considered by the applicant.	Subsection 2.3.1.3, p. 2-7; Appendix A1, Subsection 1.1.1, p. 1	No	See DR ALT-1
Appendix B (b) (2)	In a section titled, "Transmission Lines Description, Design, and Operation" provide:	--	--	--

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete   X    
 Technical Area: Project Description  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No.   0   Date: September 2024  
 Technical Staff: Lisa Worrall  
 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (b) (2) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) of each proposed transmission line route, showing the settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s);	Chapter 2, Figure 2-5, p. 2-9	Yes	
Appendix B (b) (2) (B)	A full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction.	Chapter 2, Figure 2-2, p. 2-4	No	See DR PD-2
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights-of-way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.	Chapter 2, Subsection 2.4, pp. 2-9 to 2-17, Subsection 2.5, pp. 2-17 to 2-22, Subsection 2.6, pp. 2-22 to 2-23; Appendix A1	No	See DR PD-3
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints; and	Appendix A1, Section 1.2, pp. 3 to 4	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete   X    
 Technical Area: Project Description  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No.   0   Date: September 2024  
 Technical Staff: Lisa Worrall  
 Technical Senior: Eric Knight

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (b) (3)	Applications for geothermal facilities shall contain the following additional information:	N/A	N/A	N/A
Appendix B (b) (3) (A)	Maps at a scale of 1:24,000 (or appropriate map scale agreed to by staff) showing the location of the geothermal leaseholds, along with a description by section, township, range, county, and assessor's parcel numbers of the leaseholds;	N/A	N/A	N/A
Appendix B (b) (3) (B)	Full-page color photographic reproductions of the geothermal leaseholds;	N/A	N/A	N/A
Appendix B (b) (3) (C)	A description of the process by which the geothermal leasehold was selected and the consideration given to engineering constraints, site geology, environmental impacts, water, steam, waste and fuel constraints, electric transmission constraints, and any other factors considered by the applicant. Include references to any environmental documents which address steam field development;	N/A	N/A	N/A
Appendix B (b) (3) (D)	A detailed description of the type, quality, and characteristics of the geothermal resource, including pressure and temperature flow rates, constituents and concentrations of non-condensable gases, and constituent concentrations of dissolved solids, and descriptions and concentrations of any substances potentially harmful to public health and safety or to the environment;	N/A	N/A	N/A
Appendix B (b) (3) (E)	Proposed locations of production and re-injection wells for the project. Include the applicant's assessment of geothermal resource	N/A	N/A	N/A

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete   X    
 Technical Area: Project Description  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No.   0   Date: September 2024  
 Technical Staff: Lisa Worrall  
 Technical Senior: Eric Knight

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	adequacy, including the production history of those wells within the leaseholds dedicated to the project, including pressure decline curves as available; and			
Appendix B (b) (3) (F)	A discussion of the potential impacts on the temperature, mineral content, and rate of flow of thermal springs affected by the project.	N/A	N/A	N/A
Appendix B (e) (1)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	Subsection 2.7, p. 2-23; Appendix U	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: Public Health

Project: Soda Mountain Solar Project

Technical Staff: Yifan Ding/Jacquelyn Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.		No	See DR PH-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and		No	See DR PH-2
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;		No	See DR PH-3
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Section 3.3, Subsection 3.3.5, pp. 3.3-34 to 3.3-35	No	See DR PH-6

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: Public Health

Project: Soda Mountain Solar Project

Technical Staff: Yifan Ding/Jacquelyn Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	other adopted local, regional, or statewide plan.			
Appendix B (g) (9) (A)	An assessment of the potential risk to human health from the project's hazardous air emissions using the Air Resources Board Hotspots Analysis and Reporting Program (HARP) (Health and Safety Code §§44360-44366) or its successor and Approved Risk Assessment Health Values. These values should include the cancer potency values and noncancer reference exposure levels approved by the Office of Environmental Health Hazard Assessment (OEHHA Guidelines, Cal-EPA 2005).	Appendix B (from Appendix C), Table 2, p. 138	No	See DR PH-7
Appendix B (g) (9) (B)	A listing of the input data and output results, in both electronic and print formats, used to prepare the HARP health risk assessment.	Appendix B (from Appendix C), Attachment D, pp. 166 to 173	No	See DR PH-8
Appendix B (g) (9) (C)	Identification of available health studies through the local public health department concerning the potentially affected population(s) within a six-mile radius of the proposed power plant site related to respiratory illnesses, cancers or related diseases.		No	See DR PH-5
Appendix B (g) (9) (D)	A map showing sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A).		No	See DR PH-4

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: Public Health

Project: Soda Mountain Solar Project

Technical Staff: Yifan Ding/Jacquelyn Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (9) (E)	For this section, the following definitions apply:	--	--	--
Appendix B (g) (9) (E) (i)	A sensitive receptor refers to infants and children, the elderly, and the chronically ill, and any other member of the general population who is more susceptible to the effects of the exposure than the population at large;		No	See DR PH-4
Appendix B (g) (9) (E) (ii)	An acute exposure is one that occurs over a time period of less than or equal to one (1) hour; and		No	See DR PH-7
Appendix B (g) (9) (E) (iii)	A chronic exposure is one that is greater than twelve (12) percent of a lifetime of seventy (70) years.		No	See DR PH-7
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Appendix B (from Appendix C), Table 2, p. 138	No	See DR PH-9
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and		No	See DR PH-10

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: Public Health

Project: Soda Mountain Solar Project

Technical Staff: Yifan Ding/Jacquelyn Record

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Table 2-1, p. 5	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix V, Table 2-1, p. 5	Yes	



**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete \_\_\_\_\_  
 Technical Area: **Reliability**  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

September  
 Revision No. 0 Date: 2024  
 Technical Staff: Ardalan Raisi Sofi  
 Technical Senior: Shahab Khoshmashrab

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	N/A	N/A	N/A
Appendix B (h) (3) (A)	A discussion of the sources and availability of the fuel or fuels to be used over the estimated service life of the facilities.	Subsection 1.4, p. 1-2; Subsection 2.4.1, p. 2-13; Subsection 3.3.3.3, p. 3.3-27; Subsection 5.4, pp. 5-2 to 5-3; Appendix A1, pp. 4 to 5; Appendix V, p. 11	Yes	
Appendix B (h) (3) (B)	A discussion of the anticipated service life and degree of reliability expected to be achieved by the proposed facilities on consideration of:	Subsection 2.5, p. 2-17; Appendix A1, pp. 4 to 5	Yes	
Appendix B (h) (3) (B) (i)	Expected overall availability factor, and annual and lifetime capacity factors;	Appendix A1, pp. 4 to 5	Yes	
Appendix B (h) (3) (B) (ii)	The demonstrated or anticipated feasibility of the technologies, systems, components, and measures proposed to be employed in the facilities, including the power generation system, the heat dissipation system, the water	Appendix A1, pp. 4 to 5	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete \_\_\_\_\_  
 Technical Area: **Reliability**  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

September  
 Revision No. 0 Date: 2024  
 Technical Staff: Ardalan Raisi Sofi  
 Technical Senior: Shahab Khoshmashrab

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	supply system, the reinjection system, the atmospheric emission control system, resource conveyance lines, and the waste disposal system;			
Appendix B (h) (3) (B) (iii)	Geologic and flood hazards, meteorologic conditions and climatic extremes, and cooling water availability;	Subsection 3.7.2, pp. 3.7-6 to 3.7-7; Subsection 3.7.2.3, pp. 3.7-11 to 3.7-15; Subsection 3.10.2, pp. 3.10-9 to 3.10-10; Appendix A1, pp 1 to 2	Yes	
Appendix B (h) (3) (B) (iv)	Special design features adopted by the applicant or resource supplier to ensure power plant reliability including equipment redundancy; and	Subsection 2.6, p. 2-22; Subsection 3.9.3.3, p. 3.9-20; Appendix A1, pp. 3 to 5	Yes	
Appendix B (h) (3) (B) (v)	For technologies not previously installed and operated in California, the expected power plant maturation period.	N/A	N/A	N/A
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	N/A	N/A	N/A
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws,	N/A	N/A	N/A

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete \_\_\_\_\_  
 Technical Area: Reliability Project: Soda Mountain Solar Project Revision No. 0 Date: September 2024  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Staff: Ardalan Raisi Sofi  
 Technical Senior: Shahab Khoshmashrab

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	N/A	N/A	N/A
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**      Revision No. 0      Date: September 2024  
 Technical Area: **Socioeconomics**      Project: Soda Mountain Solar Project      Technical Staff: John Carrier  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3.14, pp. 3.14-1 to 3.14-5; Section 3.15, pp. 3.15-1 to 3.15-9; Section 3.19, pp. 3.19-1 to 3.19-19; Appendix P, pp. 1 to 30	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates); and	Section 3.14, pp. 3.14-1 to 3.14-6; Section 3.15, pp. 3.15-1 to 3.15-9; Section 3.19, pp. 3.19-1 to 3.19-19; Appendix P, pp. 1 to 30	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.14.5 p. 3.14-6; Subsection 3.19.6, pp. 3.19-19; Appendix P, Section 5 pp. 24	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any	Subsection 3.14.2, pp 3.14-1 to 3.14-5; Section 3.15, pp. 3.15-1 to 3.15-8; Section 3-16, pp. 3.16-1 to 3.16-11; Section 3.19, pp. 3.19-1 to 3.19-19; Appendix P, pp. 1 to 30	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**      Revision No. 0      Date: September 2024  
 Technical Area: **Socioeconomics**      Project: Soda Mountain Solar Project      Technical Staff: John Carrier  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (7) (A)	A description of the socioeconomic circumstances of the vicinity and region affected by construction and operation of the project. Include:	Section 3.14, pp. 3.14-1 to 3.14-5; Appendix P, pp. 1 to 15 and Appendices A through C of Appendix P	Yes	
Appendix B (g) (7) (A) (i)	The economic characteristics, including the economic base, fiscal resources, and a list of the applicable local agencies with taxing powers and their most recent and projected revenues;	Appendix P Socioeconomics Impacts, pp. 1 & 2, and 15 to 17, and Appendices B through C of Appendix P	No	See DR SOCIO-1
Appendix B (g) (7) (A) (ii)	The social characteristics, including population and demographic and community trends;	Section 3.14, pp. 3.14-2 to 3.14-3; Appendix P, pp. 3 to 5, and Appendix A of Appendix P	Yes	
Appendix B (g) (7) (A) (iii)	Existing and projected unemployment rates;	Subsection 3.14.2.2, pp. 3.14-2; Subsection 3.14.2.4, pp. 3.14-3; Subsection 3.14.3.2, pp. 3.14-4; Appendix P, pp. 6 (Table 1), 7 (Table 3), 13 to 15, and Appendix A of Appendix P, Tables A-4 and A-6.	Yes	
Appendix B (g) (7) (A) (iv)	Availability of skilled workers by occupation required for construction and operation of the project;	Appendix P, Subsection 1.6, pp. 5 & 6, Table 1	No	See DR SOCIO-2
Appendix B (g) (7) (A) (v)	Availability of temporary and permanent housing and current vacancy rate; and	Subsection 3.14.2.2, p. 3.14-2; Table 3.14-1; Appendix P, Subsection 1.4, p. 3; Subsection 1.6 & Table 1, pp.	No	See DR SOCIO-3

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete  Revision No. 0 Date: September 2024  
 Technical Area: Socioeconomics Project: Soda Mountain Solar Project Technical Staff: John Carrier  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
		5 & 6; Subsection 2.1 & Table 2, p. 7; Subsection 2.4.2, pp. 10 & 11; Appendix A (of Appendix P), Table A-3		
Appendix B (g) (7) (A) (vi)	Capacities, service standards, existing and expected use levels, and planned expansion of utilities (gas, water, and waste) and public services, including fire protection, law enforcement, emergency response, medical facilities, other assessment districts, school districts, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information for each school district shall include current enrollment and yearly expected enrollment by grade level groupings, excluding project-related changes for the duration of the project schedule.	Subsection 3.15.2 pp. 3.15-4 to 3.15-8; Subsection 3.19.2 pp 3.19-9 to 3.19-18; Appendix P, Subsection 1.4, p. 4, Subsection 1.6, p. 6, Table 1; Subsection 2.3, pp. 8 to 10; Appendix A (of Appendix P), pp. 31 to 32, Table A-5; Appendix C, Table C-1, p. 39	No	See DR SOCIO-4
Appendix B (g) (7) (B)	A discussion of the socioeconomic impacts caused by the construction and operation of the project (note year of estimate, model, if used, and appropriate sources), including:	Appendix P, Section 4, pp. 18-23; Appendix B (of Appendix P), pp. 34-37, Tables B-1 to B-3	Yes	
Appendix B (g) (7) (B) (i)	An estimate of the number of workers to be employed each month by occupation during construction, and for operations, an estimate of the number	Subsection 3.14.3.2, p. 3.14-4; Appendix P, Subsection 3.1.3 p. 16, Subsections 4.1.1 and 4.1.2 p. 19	No	See DR SOCIO-5

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**      Revision No. 0      Date: September 2024  
 Technical Area: **Socioeconomics**      Project: Soda Mountain Solar Project      Technical Staff: John Carrier  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	of permanent operations workers during a year;			
Appendix B (g) (7) (B) (ii)	An estimate of the percentage of non-local workers who will relocate to the project area to work during the project construction and operation;	Subsection 3.14.3.2, p. 3.14-4; Appendix P, Subsection 2.4.1, p. 10	Yes	
Appendix B (g) (7) (B) (iii)	An estimate of the potential population increase caused directly and indirectly by the project;	Subsection 3.14.2.1 pp 3.14-1; Subsection 3.14.3.2 p. 3.14-4	Yes	
Appendix B (g) (7) (B) (iv)	The potential impact of population increase on housing during the construction and operations phases;	Subsection 3.14.3.2, p. 3.14-4	Yes	
Appendix B (g) (7) (B) (v)	The potential impacts, including additional costs and ability to meet local service standards, on utilities (gas, water, and waste) and public services, including fire, law enforcement, emergency response, medical facilities, other assessment districts, and school districts. Include response times to hospitals and for police protection, fire projection, emergency services, parks and recreation facilities, libraries, and other public facilities. For projects outside metropolitan areas with a population of 500,000 or more, information on schools shall include project-related enrollment changes by grade level groupings and associated facility and staffing impacts by school	Section 3.15, Section 3.19, Subsection 3.19.3.4. pp. 3.19-14 to 3.19.18	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**      Revision No. 0      Date: September 2024  
 Technical Area: **Socioeconomics**      Project: Soda Mountain Solar Project      Technical Staff: John Carrier  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	district during the construction and operating -phases;			
Appendix B (g) (7) (B) (vi)	An estimate of applicable school impact fees;	Appendix P, Subsection 2.3.7, p. 10, Table 4	Yes	
Appendix B (g) (7) (B) (vii)	An estimate of the total construction payroll and separate estimates of the total operation payroll for permanent and short-term (contract) operations employees;	Appendix P, Subsection 3.1.2, p. 16, Tables 5 & 6; Subsection 4.1, pp. 18-to 19, Table 7	Yes	
Appendix B (g) (7) (B) (viii)	An estimate of the expenditures for locally purchased materials for the construction and operation phases of the project;	Appendix P, Appendix B (of Appendix P), Table B-1, p. 34	Yes	
Appendix B (g) (7) (B) (ix)	An estimate of the capital cost (plant and equipment) of the project;	Appendix P, Subsection 3.1.2, p. 16, Table 5	No	See DR SOCIO-6
Appendix B (g) (7) (B) (x)	An estimate of sales taxes generated during construction and separately during an operational year of the project;	Appendix P, Subsection 3.1.4, p. 16; Subsection 3.1.5, p. 17; Subsection 4.2.2, pp.21 to 23, Tables 9 and 10.	No	See DR SOCIO-7
Appendix B (g) (7) (B) (xi)	An estimate of property taxes generated during an operational year of the project;	Appendix P, Subsection 4.2.2, p. 21, footnote 18	Yes	
Appendix B (g) (7) (B) (xii)	The expected direct, indirect, and induced income and employment effects due to construction and operation of the project; and	Appendix P, Subsection 4.2.1, p. 20, Table 8	No	See DR SOCIO-8
Appendix B (g) (7) (B) (xiii)	A discussion of impacts to environmental justice populations by technical areas and whether any impacts would	Subsection 3.14.1.1, p. 3.14-1; Appendix P, Subsection 1.4, p. 3; Subsection 2.5, pp. 11 to 15.	No	See DR SOCIO-9



**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**      Revision No. 0      Date: September 2024  
 Technical Area: **Socioeconomics**      Project: Soda Mountain Solar Project      Technical Staff: John Carrier  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	disproportionately affect the environmental justice populations.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and		No	See DR SOCIO-10
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix V, Table 2-1, pp. 3 to 6	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Table 2-1, pp. 3 to 6	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**      Revision No. 0      Date: September 2024  
 Technical Area: **Socioeconomics**      Project: Soda Mountain Solar Project      Technical Staff: John Carrier  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_ Incomplete  X

Revision No.  0  Date:  September 2024

Technical Area:  Soils

Project:  Soda Mountain Solar Project

Technical Staff:  Inouye

Project Manager:  Lisa Worrall

Docket:  24-OPT-03

Technical Senior:  Karim Abulaban, Steve Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3.7, pp. 3.7-1 to 3.7-32	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.7.3, pp. 3.7-19 to 3.7-32	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 3.7.6, pp. 3.7-30 to 3.7-32	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Section 3.7, pp 3.7-1 to 3.7-32	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Soils**

Project: Soda Mountain Solar Project

Technical Staff: Inouye

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Karim Abulaban, Steve Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (15) (A)	A map at a scale of 1:24,000 and written description of soil types and all agricultural land uses that will be affected by the proposed project. The description shall include:	Subsections 3.2.1 and 3.2.2, pp. 3.2-1 to 3.2-2, 3.2-6; Subsection 3.7.2, Figure 3.7-1, Figure 3.7-2, Table 3.7-2, pp. 3.7-7 to 3.7-10	Yes	
Appendix B (g) (15) (A) (i)	The depth, texture, permeability, drainage, erosion hazard rating, and land capability class of the soil;	Subsections 3.2.1 and 3.2.2, pp. 3.2-1 to 3.2-2, 3.2-6; Subsection 3.7.2.2, Table 3.7-2, p. 3.2-9	Yes	
Appendix B (g) (15) (A) (ii)	An identification of other physical and chemical characteristics of the soil necessary to allow an evaluation of soil erodibility, permeability, re-vegetation potential, and cycling of pollutants in the soil-vegetation system;	Subsection 3.7.2.2, pp. 3.7-8 to 3.7-11; Subsection 3.7.2.3, pp. 3.7-11 to 3.7-15	Yes	
Appendix B (g) (15) (A) (iii)	The location of any proposed fill disposal or fill procurement (borrow) sites; and	Chapter 2, Subsection 2.5.3; Subsection 3.9.2.1, p. 12	No	See DR SOILS-1 and DR SOILS-2
Appendix B (g) (15) (A) (iv)	The location of any contaminated soils that could be disturbed by project construction.	Chapter 2, Subsection 2.1	No	See DR SOILS-3

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_ Incomplete  X

Revision No.  0  Date:  September 2024

Technical Area:  Soils   
 Project Manager:  Lisa Worrall

Project:  Soda Mountain Solar Project   
 Docket:  24-OPT-03

Technical Staff:  Inouye   
 Technical Senior:  Karim Abulaban, Steve Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (15) (B)	An assessment of the effects of the proposed project on soil resources and agricultural land uses. This discussion shall include:	Subsections 3.2.1 and 3.2.2, pp. 3.2-1 to 3.2-2, 3.2-6; Subsection 3.7.3.3, pp. 3.7-24 – 3.7-26	Yes	
Appendix B (g) (15) (B) (i)	The quantification of accelerated soil loss due to wind and water erosion; and	Subsection 3.7.3.3, pp. 3.7-24 to 3.7-26	Yes	
Appendix B (g) (15) (B) (ii)	The effect of power plant emissions on surrounding soil-vegetation systems.	Section 3-3, Subsection 3.3.5, pp. 3.3-34 to 3.3-35; Section 3.8, Subsection 3.8.2.2, pp. 3.8-8 to 3.8-9, Table 3.8-2; Appendix C, Section 3.3, Section 6.3	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Appendix V, Section 2.0, Table 2-2, pp. 6 to 7; Subsection 3.7.1, pp. 3.7-1 to 3.7-6	Yes	
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws,	Appendix V, Section 2.0, Table 2-1, pp. 2 to 6	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete  X

Revision No.  0  Date:  September 2024

Technical Area:  Soils   
 Project Manager:  Lisa Worrall

Project:  Soda Mountain Solar Project   
 Docket:  24-OPT-03

Technical Staff:  Inouye   
 Technical Senior:  Karim Abulaban, Steve Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Section 2.0, Table 2-1, pp. 2 to 6	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix V, Section 2.0, Table 2-1, pp. 2 to 6	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation**

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3.17, pp 3.17-13 to 3.17-22; Appendix M	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Appendix M	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Section 3.17, p 3.17-23	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or	Section 3.17, pp. 3.17-13 to 3.17-22	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete **X**      Revision No. 0    Date: September 2024  
 Technical Area: **Traffic and Transportation**    Project: Soda Mountain Solar Project    Technical Staff: Steven Brown  
 Project Manager: Lisa Worrall    Docket: 24-OPT-03    Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	other adopted local, regional, or statewide plan.			
Appendix B (g) (5) (A)	A regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities. Include a reference to the transportation element of any applicable local or regional plan.	Section 3.17, p 3.17-11	No	See DR TRANS-1
Appendix B (g) (5) (B)	If the proposed project including any linear facility is to be located within four miles of an airport, a planned or proposed airport runway, or an airport runway under construction, discuss the project's compliance with the applicable sections of the current Federal Aviation Regulation Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace, specifically any potential to obstruct or impede air navigation generated by the project during construction or operation; such as, a thermal plume, a visible water vapor plume, glare, electrical interference, or surface structure height. The discussion should include:	Section 3.17, p 3.17-10	Yes	
Appendix B (g) (5) (B) (i)	A map at a scale of 1:24,000 that displays the airport or airstrip runway configuration, the airport influence area including all safety zones, and the proposed power plant site and related facilities.	Section 3.17, p 3.17-10	Yes	



**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation**

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (5) (B) (ii)	A thermal plume analysis that describes the plume's velocity;	N/A	N/A	N/A
Appendix B (g) (5) (B) (iii)	A discussion of the project's conformance with applicable Airport Land Use Compatibility Plan policies; and	N/A	N/A	N/A
Appendix B (g) (5) (B) (iv)	Copies of FAA Form 7460-1, Notice of Proposed Construction or Alteration, that were submitted or approved for any project component requiring notice.	N/A	N/A	N/A
Appendix B (g) (5) (C)	An evaluation of the project's potential impacts related to vehicle miles traveled (VMT) that may include:	Section 3.17, pp 3.17-18 to 3.17-19; Appendix M	No	See DR TRANS-2
Appendix B (g) (5) (C) (i)	The local jurisdiction's thresholds of significance;	Section 3.17, pp 3.17-18 to 3.17-19	Yes	
Appendix B (g) (5) (C) (ii)	Methodologies (such as local VMT Evaluation Tool);	Section 3.17, pp 3.17-18 to 3.17-19	Yes	
Appendix B (g) (5) (C) (iii)	VMT heat maps; and	N/A	N/A	N/A
Appendix B (g) (5) (C) (iv)	Transportation demand management plans and any documents supporting the project applicant's CEQA determination.	Section 3.17, pp. 3.17-13 to 3.17.22	Yes	
Appendix B (g) (5) (D)	An identification, on topographic maps at a scale of 1:24,000, and a description of existing and planned roads, rail lines, (including light rail), bike trails, airports, bus routes serving the project vicinity, pipelines, and canals in the project area affected by or serving the proposed facility. For each road identified, include the following, where applicable:	Section 3.17, p 3.17-11; Appendix A (from Appendix M)	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation**

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (5) (D) (i)	Road classification and design capacity;	Section 3.17, p. 3.17-12	Yes	
Appendix B (g) (5) (D) (ii)	Current daily average and peak traffic counts;	Appendix M	No	See DR TRANS-3
Appendix B (g) (5) (D) (iii)	Current and projected levels of service before project development, during construction, and during project operation;	Section 3.17, p 3.17-12	No	See DR TRANS-4
Appendix B (g) (5) (D) (iv)	Weight and load limitations;	Section 3.17, p 3.17-12	Yes	
Appendix B (g) (5) (D) (v)	Estimated percentage of current traffic flows for passenger vehicles and trucks; and		No	See DR TRANS-5
Appendix B (g) (5) (D) (vi)	An identification of any road features affecting public safety.		No	See DR TRANS-6
Appendix B (g) (5) (E)	An assessment of the construction and operation impacts of the proposed project on the transportation facilities identified in (g)(5)(D). Also include anticipated project specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(D). Include:		No	See DR TRANS-7 and DR TRANS-8
Appendix B (g) (5) (E) (i)	Estimated one-way trip lengths for workers, deliveries, and truck haul trips generated by the construction of the project.		No	See DR TRANS-9
Appendix B (g) (5) (E) (ii)	Description of public roadways and intersections temporarily or permanently		No	See DR TRANS-10

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Traffic and Transportation**

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	altered by construction and operation including the duration of activities.			
Appendix B (g) (5) (F)	A discussion of project-related hazardous materials to be transported to or from the project during construction and operation of the project, including the types, estimated quantities, estimated number of trips, anticipated routes, means of transportation, and any transportation hazards associated with such transport.	Section 3.17, pp 3.9-22 to 3.9-24	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 3,17, pp 3.17-1 to 3.17-10	No	See DR TRANS-11
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the	Appendix V, Table 2-1	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_\_\_ Incomplete X

Revision No. 0 Date: September 2024

Technical Area: Traffic and Transportation

Project: Soda Mountain Solar Project

Technical Staff: Steven Brown

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Table 2-1	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.		No	See DR TRANS-12

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: **Transmission System**

Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project

Docket: 24-OPT-03

Technical Staff: Sudath Edirisuriya

Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 2.4.1 to 2.4.4, pp. 2.9 to 2.14	No	See DR-TSSN 1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	N/A	N/A	N/A
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference	Subsection 2.4.1 to 2.4.4, pp 2.9 to 2.14, Figure 2.6 and 2.7	No	See DR-TSSN 2

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

Technical Area: **Transmission System**

Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project

Docket: 24-OPT-03

Technical Staff: Sudath Edirisuriya

Technical Senior: Joseph Hughes

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (18) (A)	The locations and a description of the existing switchyards and overhead and underground transmission lines that would be affected by the proposed project.	Subsection 2.4.1 to 2.4.4, pp 2.9 to 2.14, Figure 2.6 and 2.7	Yes	
Appendix B (g) (18) (B)	An estimate of the existing electric and magnetic fields from the facilities listed in (A) above and the future electric and magnetic fields that would be created by the proposed project, calculated at the property boundary of the site and at the edge of the rights of way for any transmission line. Also provide an estimate of the radio and television interference that could result from the project.	Subsection 2.4.1 to 2.4.4, pp 2.9 to 2.14	No	See DR-TSSN 3
Appendix B (g) (18) (C)	Specific measures proposed to mitigate identified impacts, including a description of measures proposed to eliminate or reduce radio and television interference, and all measures taken to reduce electric and magnetic field levels.	Subsection 2.4.1 to 2.4.4, pp 2.9 to 2.14	No	See DR-TSSN 4

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

**Transmission System**

Technical Area: Safety and Nuisance  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Technical Staff: Sudath Edirisuriya  
 Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.	Subsection 2.4.1 to 2.4.4, pp 2.9 to 2.14	No	See DR-TSSN 5
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Subsection 2.4.1 to 2.4.4, pp 2.9 to 2.14	No	See DR-TSSN 5
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Chapter 6.0, pp 6.1 to 6.2	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**

Revision No.   0   Date:  September 2024 

Technical Area: **Transmission System**

Project:  Soda Mountain Solar Project 

Technical Staff:  Sudath Edirisuriya 

Project Manager:  Lisa Worrall 

Docket:  24-OPT-03 

Technical Senior:  Joseph Hughes 

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	N/A	N/A	N/A



**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete

Revision No. 0 Date: September 2024

**Transmission System**

Technical Area: Design

Project: Soda Mountain Solar Project

Technical Staff: Sudath Edirisuriya

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	N/A	N/A	N/A
Appendix B (h) (2) (A)	A discussion of the need for the additional electric transmission lines, substations, or other equipment, the basis for selecting principal points of junction with the existing electric transmission system, and the capacity and voltage levels of the proposed lines, along with the basis for selection of the capacity and voltage levels.	Subsection 2.4.1 to 2.4.4, pp 2.9 to 2.14, Figure 2.6 and 2.7	No	See DR TSD-1, TSD-2, TSD-3, TSD-5, and TSD-8
Appendix B (h) (2) (B)	A discussion of the extent to which the proposed electric transmission facilities have been designed, planned, and routed to meet the transmission requirements created by additional generating facilities	Section 2.4.1 to 2.4.4, pp 2.9 to 2.14, Figure 2.6 and 2.7	Yes	

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**Transmission System**

Technical Area: Design

Project: Soda Mountain Solar Project

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Project Manager: Lisa Worrall

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Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	planned by the applicant or any other entity.			
Appendix B (b) (2) (C)	A detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights of way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators.	Section 2.4.1 to 2.4.4, pp 2.9 to 2.14, Figure 2.6 and 2.7	No	See DR TSD-3 and TSD-4
Appendix B (b) (2) (D)	A description of how the route and additional transmission facilities were selected, and the consideration given to engineering constraints, environmental impacts, resource conveyance constraints, and electric transmission constraints.	Section 2.4.1 to 2.4.4, pp 2.9 to 2.14, Figure 2.6 and 2.7	Yes	
Appendix B (b) (2) (E)	A completed System Impact Study or signed System Impact Study Agreement with the Los Angeles Department of Water and Power and proof of payment. When not connecting to the California Independent System Operator controlled grid, provide the executed System Impact	Appendix O1 (Confidential)	Yes	

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	Study agreement and proof of payment to the interconnecting utility. If the interconnection and operation of the proposed project will likely impact an transmission system that is not controlled by the interconnecting utility (or California Independent System Operator), provide evidence of a System Impact Study or agreement and proof of payment (when applicable) with/to the impacted transmission owner or provide evidence that there are no system impacts requiring mitigation.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Section 2.4.1 to 2.4.4, pp 2.9 to 2.14, Figure 2.6 and 2.7	No	See DR TSD-6 and DR TSD-7
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that	Section 2.4.1 to 2.4.4, pp 2.9 to 2.14, Figure 2.6 and 2.7	No	See DR TSD-7

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**Transmission System**

Technical Area: Design

Project: Soda Mountain Solar Project

Technical Staff: Sudath Edirisuriya

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Joseph Hughes

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.			
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Chapter 6.0, pp. 6.1 to 6.2	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix O1 (Confidential)	Yes	

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Completeness: Complete \_\_\_ Incomplete X      Revision No. 0      Date: September 2024  
 Technical Area: Visual Resources      Project: Soda Mountain Solar Project      Technical Staff: Michael Clayton  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.1.2.4, pp. 3.1-14 to 3.1-21, Subsection 3.1.3.1, p. 3.1-22, Subsection 3.1.3.2, pp. 3.1.22 to 3.1.28, Subsection 3.1.3.3, pp. 3.1.28 to 3.1-34; Appendix B, Section 4.1, pp. 16-17; Section 5, pp. 28-33; Section 6, pp. 3.1-33 to 3.1-34	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.1.2.4, pp. 3.1-14 to 3.1-21; Subsection 3.1.3.1, p. 3.1-22; Subsection 3.1.3.2, pp. 3.1.22 to 3.1.28; Subsection 3.1.3.3, pp. 3.1.28 to 3.1-34. Appendix B, Section 4.1, pp. 16 to 17, Section 5, pp. 28 to -33, Section 6, pp. 33 to 34	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.1.4, pp. 3.1-35 to 3.1-36	Yes	
Appendix B (g) (1)	... provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation, and	Subsection 3.1, pp 3.1-1 to 3.1-36. Appendix B, Sections 1 to 7, Appendices A to E (from Appendix B), pp. 1 to 121	No	See DR VIS-1

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 Technical Area: Visual Resources      Project: Soda Mountain Solar Project      Technical Staff: Michael Clayton  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection (or a combination of) used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (6) (A)	Provide a description of the existing landscape (built or natural) where the proposed project is to be sited and the vicinity, and along the proposed routes for any aboveground project-related linear facilities. Include:	Subsection 3.1.2, pp. 3.1-10 to 3.1-12	Yes	
Appendix B (g) (6) (A) (i)	Show on a map(s) (pinpoint) any designated or recognized scenic vista and scenic resource within a five-mile radius of the project and one-mile radius of a project-related linear facility. Include:	Subsection 3.1.2.2, Figure 3.1-1, p. 3.1-12	Yes	

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (6) (A) (i) a.	Any designated scenic vista and scenic resource in an adopted federal, state, county, or city government planning document, plan, or regulation.	Subsection 3.1.2.2, Figure 3.1-1, p. 3.1-12; Subsection 3.1.3.3, pp. 3.1-28 to 3.1-29	Yes	
Appendix B (g) (6) (A) (i) b.	A natural feature or object that is a part of the land, such as a geologic distinguishing characteristic (e.g., laccolith), geomorphologic feature (e.g., gorge), or other terrain feature (e.g., a water body, open space, or a tree recognized for its aesthetic, botanical and ecological value, or age, rarity, and size).	Subsection 3.1.2.2, pp. 3.1-10 to 3.1-12	No	See DR VIS-2
Appendix B (g) (6) (A) (i) c.	A man-made feature or object that embodies elements of architecture or engineering design, detail, materials or craftsmanship that represent a significant innovation or is unique, such as the California State Capitol, Golden Gate Bridge, or Hollywood Sign.	Subsection 3.1.2.2, pp. 3.1-10 to 3.1-12	Yes	
Appendix B (g) (6) (A) (i) d.	Explain does the project eliminate or obstruct the public view (the visible area from a location where the public has a legal and physical right of access to real property) of a scenic vista and	Subsection 3.1.3.3, p. 3.1-31; Subsection 3.1.3.3, pp. 3.1-29 to 3.1-31	No	See DR VIS-1

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 Technical Area: Visual Resources Project: Soda Mountain Solar Project Technical Staff: Michael Clayton  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	scenic resource? Is the project situated so that it changes the visual aspect of a scenic resource by being different or in sharp contrast?			
Appendix B (g) (6) (A) (ii)	Describe the existing nighttime lighting on the project site and in the vicinity.	Subsection 3.1.3.3, pp. 3.1-28 to 3.1-29; Appendix B, Appendix A (from Appendix B), p. 7	Yes	
Appendix B (g) (6) (B)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within an "urbanized area" as defined in Public Resources Code section 21071, explain the project's conformance with the city/county General Plan, and city municipal code or county government code (e.g., zoning) governing scenic quality.	N/A	N/A	N/A
Appendix B (g) (6) (C)	In accordance with CEQA Guidelines as found in 14 CCR Division 6, Chapter 3, Appendix G Environmental Checklist Form, I. Aesthetics c, if the project is to be constructed within a non-urbanized area provide the following:	--	--	--



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 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

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Appendix B (g) (6) (C) (i)	Show on a map the pinpoint location of the key observation point(s) (KOP) for the project. A KOP is a fixed position in a publicly accessible location where a public view of the project is analyzed and/or evaluated in the landscape. Objects of aesthetic significance are the primary focus in the KOP selection.	Subsection 3.1.2.4, Figures 3.1-3 and 3.1-4, pp. 3.1-18 to 3.1-19	No	See DR VIS-1
Appendix B (g) (6) (C) (ii)	If an object of aesthetic significance is not in the vicinity of the project, a KOP is to be selected based on importance to stakeholders, visibility, direct public selection, worst-case scenario, or other reason. Explain the reason the KOP was chosen. At a minimum two KOPs are to be selected.	Subsection 3.1.2.4, pp. 3.1-14 to 3.1-21; Appendix B, Appendix C (from Appendix B)	No	See DR VIS-1
Appendix B (g) (6) (C) (iii)	Provide a color photograph(s) showing an actual line of sight at eye level during daytime and clear weather from the KOP to the project site prior to any alteration (existing condition). The photographer at the KOP is to use a standard lens. For each photograph provide the following information: camera type, lens focal length, viewing angle; date	Appendix B, Appendix D (from Appendix B)	No	See DR VIS-1

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 Technical Area: **Visual Resources**      Project: Soda Mountain Solar Project      Technical Staff: Michael Clayton  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

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	and time the photograph was taken, and the distance to the project site.			
Appendix B (g) (6) (C) (iv)	Using the photograph from the KOP provide a spatially accurate and realistically photo manipulated computer simulated image of the project (photo-realistic simulation) one-year after completion of construction (existing condition plus proposed project).	Appendix B, Appendix D (from Appendix B)	No	See DR VIS-1
Appendix B (g) (6) (C) (v)	The KOP photograph and the photo-realistic simulation are to be capable of 11" x 17" color print by a printer capable at a minimum 600 dots per inch output resolution.	Kiteworks	No	See DR VIS-1
Appendix B (g) (6) (C) (vi)	Provide a copy of the KOP photograph(s) and photo-realistic simulation(s) in an electronic file.	Kiteworks	No	See DR VIS-1
Appendix B (g) (6) (D)	Show and describe the project in the landscape.	Subsection 3.1.3.3, pp. 3.1-29 to 3.1-31; Appendix B, Section 5.1, Appendix D (from Appendix B)	No	See DR VIS-1
Appendix B (g) (6) (D) (i)	Provide an 8.5" x 11" sized scaled elevation(s) of project buildings, structures, and major equipment; a table listing their dimensions (height, length, width, diameter).	Appendix B, Subsection 2.2, pp. 2 to 5, Appendix D (from Appendix B)	No	See DR VIS-3

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 Project Manager: Lisa Worrall Docket: 24-OPT-03      Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (6) (D) (ii)	Provide a table and description of the exterior surface treatments and finishes for the buildings, structures, major equipment (e.g., colors, flat and/or textured finishes), and structural materials.	Subsection 3.1.3.2, pp. 3.1-23 to 3.1-24	No	See DR VIS-4
Appendix B (g) (6) (D) (iii)	Describe project specific architectural treatment or design technique mitigation unique to the project’s siting at the location (e.g., camouflage, disguise, screen), if any.	Subsection 3.1.3.2, pp. 3.1-23 to 3.1-24; Appendix B, Appendix B (from Appendix B)	Yes	
Appendix B (g) (6) (D) (iv)	Provide a project specific conceptual landscape design plan that conforms with the city municipal code or county government code. Include:	Appendix B, Appendix B (from Appendix B)	No	See DR VIS-5
Appendix B (g) (6) (D) (iv) a.	the type of plant and/or tree species, location, quantity, size, spacing at installation/planting, expected growth rates, and expected heights at one-year, five years, and maturity. Specify irrigation system components and show their locations.	Appendix B, Appendix B (from Appendix B)	No	See DR VIS-5
Appendix B (g) (6) (D) (iv) b.	the calculated total pervious surface amount for the project site; include the surface to be replaced, the new surface, and the total area to be landscaped.	Appendix B, Appendix B (from Appendix B)	Yes	

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SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
Appendix B (g) (6) (D) (v)	Provide a project specific conceptual outdoor lighting control and management plan (lighting plan) and explain the control of reflectance from exterior surfaces offsite that conform with the city municipal code or county government code.	Subsection 3.1.3.2, pp. 3.1-24 to 3.1-25, Subsection 3.1.3.3, pp. 3.1-31 to 3.1-32; Appendix B, Subsection 2.2.7, pp. 4 to 5, Appendix A (from Appendix B), pp. 1 to 16	No	See DR VIS-6
Appendix B (g) (6) (D) (v) a.	Provide a list of the project-specific luminaires, identify the design (e.g., full cutoff, semi cutoff, non cutoff) and indicate if the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Show the project-specific luminaires locations on a diagram or elevation.	Subsection 3.1.3.2, pp. 3.1-24 to 3.1-25, Subsection 3.1.3.3, pp. 3.1-31 to 3.1-32; Appendix B, Subsection 2.2.7, pp. 4 to 5, Appendix A (from Appendix B), pp. 1 to 16	No	See DR VIS-7
Appendix B (g) (6) (D) (v) b.	Describe reflectance, the intensity of the specular reflectance from the exterior surface of the project's large buildings, structures, and major equipment offsite to the surrounding area (e.g., the light reflected from the shiny surface). The reflectance of the object—how bright it shines—depends on the intensity of the	Subsection 3.1.3.2, pp. 3.1-24 to 3.1-25, Subsection 3.1.3.3, pp. 3.1-31 to 3.1-32; Appendix B, Subsection 2.2.7, pp. 4 to 5, Appendix A (from Appendix B), pp. 1 to 16, Appendix E (from Appendix B), pp. 1 to 20	No	See DR VIS-8

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 Technical Area: Visual Resources Project: Soda Mountain Solar Project Technical Staff: Michael Clayton  
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	light striking it and the materials from which it is made (e.g., glass, reinforced concrete, structural steel).			
Appendix B (g) (6) (E)	If the project is to use a cooling tower emitting a publicly visible water vapor plume (visible plume) in the atmosphere provide the following information:	N/A	N/A	N/A
Appendix B (g) (6) (E) (i)	Provide the cooling tower's number of fan cells, the fan cell stack height and diameter, the exhaust mass flow rate, heat rejection rate, and exhaust temperature.	N/A	N/A	N/A
Appendix B (g) (6) (E) (ii)	Provide fogging curves specific to the cooling tower's exhaust discharge for at least three ambient air temperature conditions (a low, average, and high temperature condition).	N/A	N/A	N/A
Appendix B (g) (6) (E) (iii)	Explain if the project's forecasted visible plume emitted in the atmosphere by the cooling tower would eliminate or obstruct an existing public view of a designated or recognized scenic vista, scenic resource, and the existing visual character or quality of	N/A	N/A	N/A

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 Technical Area: Visual Resources Project: Soda Mountain Solar Project Technical Staff: Michael Clayton  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Steven Kerr

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	public views of the site and its surroundings.			
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Subsection 3.1.1, pp. 3.1-1 to 3.1-10	No	See DR VIS-9
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.	Appendix V, Section 2.0, Table 2-1, pp. 2-6	No	See DR VIS-10
Appendix B (i) (2)	The name, title, phone number, address (required), and email	Appendix V, Section 2.0, Table 2-1, pp. 2-6	No	See DR VIS-11

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 Technical Area: Visual Resources      Project: Soda Mountain Solar Project      Technical Staff: Michael Clayton  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Steven Kerr

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	address (if known), of an official who was contacted within each agency, and also provide the name of the official who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix V, Section 2.0, Table 2-1, pp. 2-6	No	See DR VIS-12

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Completeness: Complete \_\_\_ Incomplete X

Revision No. 0 Date: September 2024

Technical Area: Waste Management  
 Project Manager: Lisa Worrall

Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Technical Staff: James Ackerman/Paul Miller  
 Technical Senior: A. Abulaban/B. Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs., tit. 20, § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Subsection 3.19.2.4, pp. 3.19-10 to 3.19-12; Appendix R, pp. 1 to 35	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	Subsection 3.19.2.4, pp. 3.19-10 to 3.19-12, Subsection 3.19.3.1, Subsection 3.19.3.2 p. 3.19-13; Appendix R, pp. 1 to 35	Yes	
Cal. Code Regs., tit. 20, § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.19.6, pp. 3.19-19 to 3.19-20	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or	Subsection 3.19.2.4, pp. 3.19-10 to 3.19-12, Subsection 3.19.3.1, Subsection 3.19.3.2, p. 3.19-13, Subsection 3.19.3.3, pp. 3.19-13 to 3.19-14, Subsection 3.19.3.4, pp. 3.19-15 to 3.19-18, Table 3.19-3, p. 3.19-16, Table 3.19-4, pp. 3.19-17 to 3.19-18, Subsection 3.19.5, pp.	Yes	



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Completeness: Complete    Incomplete **X**

Revision No.   0   Date: September 2024

Technical Area: **Waste Management**

Project: Soda Mountain Solar Project

Technical Staff: James Ackerman/Paul Miller

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: A. Abulaban/B. Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	3.19-18 to 3.19-19; Appendix R, pp. 1-35		
Appendix B (g) (12) (A)	A Phase I Environmental Site Assessment (ESA) for the proposed power plant site using methods prescribed by the American Society for Testing and Materials (ASTM) document entitled "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process" (Designation: E 1527-93, May 1993), which is incorporated by reference in its entirety; or an equivalent method agreed upon by the applicant and the CEC Staff that provides similar documentation of the potential level and extent of site contamination. The Phase I ESA shall have been completed no earlier than one year prior to the filing of the application.	Appendix I	Yes	
Appendix B (g) (12) (B)	A description of each waste stream estimated to be generated during project construction and operation, including origin, hazardous or nonhazardous classification pursuant	Section 3.19, Table 3.19-3, p. 3.19-16, Table 3.19-4, pp. 3.19-17 to 3.19-18	Yes	

**DATA COMPLETENESS WORKSHEET**

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Revision No.   0   Date: September 2024

Technical Area: Waste Management

Project: Soda Mountain Solar Project

Technical Staff: James Ackerman/Paul Miller

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: A. Abulaban/B. Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	to Title 22, California Code of Regulations, § 66261.20 et seq., chemical composition, estimated annual weight or volume generated, and estimated frequency of generation.			
Appendix B (g) (12) (C)	A description of all waste disposal sites which may feasibly be used for disposal of project wastes. For each site, include the name, location, classification under California Code of Regulations, Title 23, section 2530 et seq., the daily or annual permitted capacity, daily or annual amounts of waste currently being accepted, the estimated closure date and remaining capacity, and a description of any enforcement action taken by local or state agencies due to waste disposal activities at the site.	Subsection 3.19.2.4, pp. 3.19-10 to 3.19-12, Table 3.19-1, p. 3.19-11, Table 3.19-2, p. 3.19-12; Appendix R, Section 1.1.3.1, p.p. 8-9, Table A pp. 4 to 5, Table B, pp. 6 to 7, Table C, p. 10, Table D, pp. 11 to 12	Yes	
Appendix B (g) (12) (D)	A description of management methods for each waste stream, including methods used to minimize waste generation, length of on- and off-site waste storage, re-use and recycling opportunities, waste treatment methods used, and use of contractors for treatment.	Subsection 3.19.2.4, pp. 3.19-10 to 3.19-12, pp. 3.19-15 to 3.19-18; Appendix R, Subsection 1.1.2, p. 3, Subsection 1.1.3.1, pp. 8 to 9	Yes	

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Technical Area: **Waste Management**

Project: Soda Mountain Solar Project

Technical Staff: James Ackerman/Paul Miller

Project Manager: Lisa Worrall

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Technical Senior: A. Abulaban/B. Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Appendix R, Table E, pp. 22 to 25; Appendix V, Table 2-2, pp. 6 to 7	No	See DR-WASTE-1
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix R, Section 1.6, p. 29; Appendix V, Table 2-1 pp. 3 to 6	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official	Appendix R, Section 1.6, p. 29; Appendix V, Table 2-1 pp. 3 to 6	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete \_\_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Waste Management**

Project: Soda Mountain Solar Project

Technical Staff: James Ackerman/Paul Miller

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: A. Abulaban/B. Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	who will serve as a contact person for Commission staff.			
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix R, Section 1.6, p. 29; Appendix V, Section 2.0, pp. 2 to 6	Yes	

Completeness: Complete \_\_\_ Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

**DATA ADEQUACY WORKSHEET**

Project: Soda Mountain Solar Project

Docket: 24-OPT-03

Revision No. 0 Date: September 2024

Technical Staff: Adam White/R6 RWQCB

Technical Senior: Abdel-Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-1
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.10.6, pp. 3.10-33 to 3.10-36	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Section 3.10.2-5, pp. 3.10-9 to 3.10-33	Yes	

Completeness: Complete \_\_\_ Incomplete **X**  
 Technical Area: **Water Resources**  
 Project Manager: Lisa Worrall

**DATA ADEQUACY WORKSHEET**  
 Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No. 0 Date: September 2024  
 Technical Staff: Adam White/R6 RWQCB  
 Technical Senior: Abdel-Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (14) (A)	All the information required to apply for the following permits, if applicable, including:	--	--	--
Appendix B (g) (14) (A) (i)	Waste Discharge Requirements; National Pollutant Discharge Elimination System Permit; and/or a Section 401 Certification or Waiver from the appropriate Regional Water Quality Control Board (RWQCB);	Section 3.10, pp. 3.10-1 to 3.10-36, Appendix E-1, E-2	No	See DR WATER-2, DR WATER-8 to DR WATER-10, and DR WATER-24 to DR WATER-30
Appendix B (g) (14) (A) (ii)	Construction and Industrial Waste Discharge or Industrial Pretreatment permits from wastewater treatment agencies;	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-4 to DR WATER-7, and DR WATER-24 to DR WATER-30
Appendix B (g) (14) (A) (iii)	Nationwide Permits and/or Section 404 Permits from the U.S. Army Corps of Engineers; and	Section 3.10, pp. 3.10-1 to 3.10-36, Appendix E-1	No	See DR WATER-8 and DR WATER-9, and DR WATER-24 to DR WATER-30
Appendix B (g) (14) (A) (iv)	Underground Injection Control Permit(s) from the U.S. Environmental Protection Agency, California Division of Oil and Gas, and RWQCB.	N/A	N/A	N/A
Appendix B (g) (14) (B)	A detailed description of the hydrologic setting of the project. The information shall include a narrative discussion and on maps at a scale of 1:24,000 (or appropriate scale approved by staff), describing the chemical and physical characteristics of the following nearby water bodies that may be affected by the proposed project:	Section 3.10.2, pp. 3.10-9 to 3.10-20	Yes	
Appendix B (g) (14) (B) (i)	Ground water bodies and related geologic structures;	Section 3.10.2.3, pp. 3.10-10 to 3.10-18	Yes	
Appendix B (g) (14) (B) (ii)	Surface water bodies;	Section 3.10.2.3, p. 3.10-18	Yes	

Completeness: Complete \_\_\_ Incomplete **X**  
 Technical Area: **Water Resources**  
 Project Manager: Lisa Worrall

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 Project: Soda Mountain Solar Project  
 Docket: 24-OPT-03

Revision No. 0 Date: September 2024  
 Technical Staff: Adam White/R6 RWQCB  
 Technical Senior: Abdel-Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Appendix B (g) (14) (B) (iii)	Water inundation zones, such as the 100-year flood plain and tsunami run-up zones;	Section 3.10.2.3, pp. 3.10-18 to 3.10-20	Yes	
Appendix B (g) (14) (B) (iv)	Flood control facilities (existing and proposed); and	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-11 to DR WATER-16
Appendix B (g) (14) (B) (v)	Groundwater wells within 1/2 mile if the project will include pumping.	N/A	N/A	N/A
Appendix B (g) (14) (C)	A description of the water to be used and discharged by the project. This information shall include:	--	--	--
Appendix B (g) (14) (C) (i)	Source(s) of the primary and back-up water supplies and the rationale for their selection;	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-17 to DR WATER-21
Appendix B (g) (14) (C) (ii)	The expected physical and chemical characteristics of the source and discharge water(s) including identification of both organic and inorganic constituents before and after any project-related treatment. For source waters with seasonal variation, provide seasonal ranges of the expected physical and chemical characteristics. Provide copies of background material used to create this description (that is, laboratory analysis);	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-17 to DR WATER-21
Appendix B (g) (14) (C) (iii)	Average and maximum daily and annual water demand and waste water discharge for both the construction and operation phases of the project;	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-3, DR WATER-17 to DR WATER-21
Appendix B (g) (14) (C) (iv)	A detailed description of all facilities to be used in water conveyance (from primary source to the power plant site), water	Section 3.10, pp. 3.10-1 to 3.10-36	N/A	See DR WATER-3.

Completeness: Complete \_\_\_ Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

**DATA ADEQUACY WORKSHEET**

Project: Soda Mountain Solar Project

Docket: 24-OPT-03

Revision No. 0 Date: September 2024

Technical Staff: Adam White/R6 RWQCB

Technical Senior: Abdel-Karim Abulaban

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	treatment, and wastewater discharge. Include a water mass balance diagram;			
Appendix B (g) (14) (C) (v)	For all water supplies intended for industrial uses to be provided from public or private water purveyors, a letter of intent or will-serve letter indicating that the purveyor is willing to serve the project, has adequate supplies available for the life of the project, and any conditions or restrictions under which water will be provided. If a will-serve letter or letter of intent cannot be provided, identify the most likely water purveyor and discuss the necessary assurances from the water purveyor to serve the project;	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-17 to DR WATER-21
Appendix B (g) (14) (C) (vi)	For all water supplied which necessitates transfers and/or exchanges at any point, identify all parties and contracts/agreements involved, the primary source for the transfer and/or exchange water (that is, surface water, groundwater), and provide the status of all appropriate agencies' approvals for the proposed use, environmental impact analysis on the specific transfers or exchanges required to obtain the proposed supplies, a copy of any agency regulations that govern the use of the water, and an explanation of how the project complies with the agency regulation(s);	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-17 to DR WATER-21



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 Technical Area: **Water Resources**  
 Project Manager: Lisa Worrall

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Appendix B (g) (14) (C) (vii)	Provide water mass balance and heat balance diagrams for both average and maximum flows that include all process or ancillary water supplies and wastewater streams. Highlight any water conservation measures on the diagram and the amount that they reduce water demand; and	N/A	N/A	N/A
Appendix B (g) (14) (C) (viii)	<p>For all projects which have a discharge, provide a copy of the will-serve letter, permit or contract with the public or private entity that will be accepting the wastewater and contact storm water from the project. The letter, permit or contract, if possible, shall identify the discharge volumes and the chemical or physical characteristics under which the wastewater and contact storm water will be accepted.</p> <p>In the event that a will-serve letter, permit, or contract cannot be provided, identify the most likely wastewater/storm water entity and discuss why the applicant was unable to secure the necessary assurances to serve the project's wastewater/storm water needs. Also, discuss the term of the wastewater service to the project, whether the wastewater entity has adequate permit capacity for the volume of wastewater from the project and has adequate permit levels for the chemical/physical</p>	N/A	N/A	N/A

Completeness: Complete \_\_\_ Incomplete **X**  
 Technical Area: **Water Resources**  
 Project Manager: Lisa Worrall

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Revision No. 0 Date: September 2024  
 Technical Staff: Adam White/R6 RWQCB  
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<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	characteristics of the project's wastewater and storm water for the life of the project, and any issues or conditions/restrictions the wastewater entity may impose on the project.			
Appendix B (g) (14) (D)	Identify all project elements associated with stormwater drainage, including a description of the following:	--	--	--
Appendix B (g) (14) (D) (i)	Monthly and seasonal precipitation and stormwater runoff and drainage patterns for the proposed site and surrounding area that may be affected by the project's construction and operation;	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-11 to DR WATER-16
Appendix B (g) (14) (D) (ii)	Drainage facilities and the design criteria used for the plant site and ancillary facilities, including but not limited to capacity of designed system, design storm, and estimated runoff;	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-11 to DR WATER-16
Appendix B (g) (14) (D) (iii)	All assumptions and calculations used to calculate runoff and to estimate changes in flow rates between pre- and post-construction; and	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-11 to DR WATER-16
Appendix B (g) (14) (D) (iv)	A copy of applicable regional and local requirements regulating the drainage systems, and a discussion of how the project's drainage design complies with these requirements.	Section 3.10, pp. 3.10-1 – 3.10-36	No	See DR WATER-11 to DR WATER-16
Appendix B (g) (14) (E)	An impacts analysis of the proposed project on water resources and a discussion of conformance with water-related LORS and policy. This discussion shall include:	Section 3.10, pp. 3.10-1 – 3.10-36	No	See DR WATER-11 to DR WATER-16

Completeness: Complete \_\_\_ Incomplete **X**  
 Technical Area: **Water Resources**  
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Appendix B (g) (14) (E) (i)	The effects of project demand on the water supply and other users of this source, including, but not limited to, water availability for other uses during construction or after the power plant begins operation, consistency of the water use with applicable RWQCB basin plans or other applicable resource management plans, and any changes in the physical or chemical conditions of existing water supplies as a result of water use by the power plant;	N/A	N/A	N/A
Appendix B (g) (14) (E) (ii)	If the project will pump groundwater, an estimation of aquifer drawdown based on a computer modeling study shall be conducted by a professional geologist and include the estimated drawdown on neighboring wells within 0.5 mile of the proposed well(s), any effects on the migration of groundwater contaminants, and the likelihood of any changes in existing physical or chemical conditions of groundwater resources shall be provided;	Section 3.10, pp. 3.10-1 – 3.10-36	No	See DR WATER-17 to DR WATER-21
Appendix B (g) (14) (iii)	The effects of construction activities and plant operation on water quality and to what extent these effects could be mitigated by best management practices;	Section 3.10, pp. 3.10-1 – 3.10-36	No	See DR WATER-17 to DR WATER-21
Appendix B (g) (14) (iv)	If not using a zero liquid discharge project design for cooling and process waters, include the effects of the proposed wastewater disposal method on receiving waters, the feasibility of using pre-treatment techniques to reduce	N/A	N/A	N/A

Completeness: Complete \_\_\_ Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

**DATA ADEQUACY WORKSHEET**

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Technical Staff: Adam White/R6 RWQCB

Technical Senior: Abdel-Karim Abulaban

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	impacts, and beneficial uses of the receiving waters. Include an explanation why the zero liquid discharge process is "environmentally undesirable," or "economically unsound;"			
Appendix B (g) (14) (v)	If using fresh water, include a discussion of the cumulative impacts, alternative water supply sources and alternative cooling technologies considered as part of the project design. Include an explanation of why alternative water supplies and alternative cooling are "environmentally undesirable," or "economically unsound;"	N/A	N/A	N/A
Appendix B (g) (14) (vi)	The effects of the project on the 100-year flood plain, flooding potential of adjacent lands or water bodies, or other water inundation zones; and	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-16
Appendix B (g) (14) (vii)	All assumptions, evidence, references, and calculations used in the analysis to assess these effects.	Section 3.10, pp. 3.10-1 to 3.10-36	No	See DR WATER-1.
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed; and	Appendix V, Section 2.0, pp. 6 to 7	Yes	

Completeness: Complete \_\_\_ Incomplete **X**

Technical Area: **Water Resources**

Project Manager: Lisa Worrall

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Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix V, Section 2.0, pp. 2 to 6	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix V, Section 2.0, pp. 2 to 6	Yes	
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix V, Section 2.0, pp. 2 to 6	No	See DR WATER-3.

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete  Revision No. 0 Date: September 2024  
 Technical Area: Wildfire Project: Soda Mountain Solar Project Technical Staff: Paul Miller  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Section 3.20, pp. 3.20-1 to 3.20-23	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference;	Subsection 3.20.5, pp. 3.20-22 to 3.20-23	Yes	
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any	Section 3.20, pp. 3.20-1 to 3.20-23	Yes	

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Completeness: Complete  Incomplete  Revision No. 0 Date: September 2024  
 Technical Area: Wildfire Project: Soda Mountain Solar Project Technical Staff: Paul Miller  
 Project Manager: Lisa Worrall Docket: 24-OPT-03 Technical Senior: Brett Fooks

<b>SITING REGULATIONS</b>	<b>INFORMATION</b>	<b>APPLICATION SECTION NUMBER AND PAGE NUMBER</b>	<b>COMPLETE YES OR NO</b>	<b>INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS</b>
	reference materials used such as general plan or other adopted local, regional, or statewide plan.			
Appendix B (g) (19) (A)	A map showing State Responsibility Areas (SRA,) as defined in Public Resources Code section 4102, relative to the proposed project.	Subsection 3.20.2, p. 3.20-9, Figure 3.20-1	Yes	
Appendix B (g) (19) (B)	A map showing state Fire Hazard Severity Zones, as defined in 14 CCR section 1280.01, relative to the proposed project.	Subsection 3.20.2, p. 3.20-9, Figure 3.20-1	Yes	
Appendix B (g) (19) (C)	If the project would be in the vicinity of an SRA or a Very High Fire Hazard Severity Zone, as defined in 14 CCR section 1265.00, provide:	N/A	N/A	N/A
Appendix B (g) (19) (C) (i)	Local emergency response or evacuation plans and a description of how the proposed project could influence their effectiveness.	Subsection 3.20.3.4, p. 3.20-18	Yes	
Appendix B (g) (19) (C) (ii)	A discussion of how potential project pollutants could be contained onsite during a wildfire event.	Subsection 3.20.3.4, p. 3.20-18	Yes	
Appendix B (g) (19) (C) (iii)	A description of infrastructure that would be built or maintained (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate the risk of wildfire.	Subsection 3.20.3.4, pp. 3.20-18 to 3.20-19	Yes	
Appendix B (g) (19) (C) (iv)	Describe people or structures downslope or downstream of the	Subsection 3.20.3.4, p. 3.20-19	Yes	

**DATA COMPLETENESS WORKSHEET**

Completeness: Complete  Incomplete       Revision No.   0   Date: September 2024  
 Technical Area: Wildfire      Project: Soda Mountain Solar Project      Technical Staff: Paul Miller  
 Project Manager: Lisa Worrall      Docket: 24-OPT-03      Technical Senior: Brett Fooks

SITING REGULATIONS	INFORMATION	APPLICATION SECTION NUMBER AND PAGE NUMBER	COMPLETE YES OR NO	INFORMATION REQUIRED TO MAKE APPLICATION CONFORM WITH REGULATIONS
	proposed project that could be impacted by flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.			



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Completeness: Complete \_\_\_ Incomplete **X**

Revision No. 0 Date: September 2024

Technical Area: **Worker Safety**

Project: Soda Mountain Solar Project

Technical Staff: Paul Miller, Daniel Jones

Project Manager: Lisa Worrall

Docket: 24-OPT-03

Technical Senior: Brett Fooks

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Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A)	Descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.	Appendix Q, Subsection 1.2, pp. 1 to 17	Yes	
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (B)	Descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates; and	N/A	N/A	N/A
Cal. Code Regs. Tit. 20 § 1704, (a) (3) (C)	A list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference.	Appendix Q, Subsection 1.6, pp. 34 to 36	Yes	

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Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Describe the approach, list or projection or a combination, used to develop the cumulative setting for the proposed project. Include any reference materials used such as general plan or other adopted local, regional, or statewide plan.	Appendix Q, Subsection 1.1 p. 1; Subsection 1.2 pp. 1 to 18	No	See DR WS-1 to DR WS-3
Appendix B (g) (11) (A)	A description of the safety training programs that will be required for construction and operation personnel.	Appendix Q, Subsection 1.2.4.4, pp. 15 to 16, Tables C and D	No	See DR WS-1
	A complete description of the fuel handling system and the fire suppression system.	Subsection 3.9.3.4, p. 3.9-25 and p. 3.9-27; Appendix Q, Subsection 1.2.4.5, pp. 16 to 18;	No	See DR WS-2
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows:	--	--	--

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	Construction Health and Safety Program: <ul style="list-style-type: none"> <li>Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509);</li> </ul>	Appendix Q, Subsection 1.2.4.1.1, pp. 7 to 8	Yes	
	<ul style="list-style-type: none"> <li>Fire Protection and Prevention Plan (8 Cal. Code Regs., section 1920);</li> </ul>	Appendix Q, Subsection 1.2.4.1.2, pp. 8 to 9	No	See DR WS-2 to DR WS-3
	<ul style="list-style-type: none"> <li>Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522)</li> </ul>	Appendix Q, Subsection 1.2.4.1.3, pp. 9 to 10	Yes	
	Operation Health and Safety Program: <ul style="list-style-type: none"> <li>Injury and Illness Prevention Program (8 Cal. Code Regs., §3203);</li> </ul>	Appendix Q, Subsection 1.2.4.2.1, pp. 10 to 12	Yes	
	<ul style="list-style-type: none"> <li>Fire Prevention Plan (8 Cal. Code Regs., § 3221);</li> </ul>	Appendix Q, Subsection 1.2.4.2.2, pp. 12 to 13	No	See DR WS-2 to DR WS-3
	<ul style="list-style-type: none"> <li>Emergency Action Plan (8 Cal. Code Regs., § 3220);</li> </ul>	Appendix Q, Subsection 1.2.4.2.4, pp. 13 to 14	Yes	
	<ul style="list-style-type: none"> <li>Personal Protective Equipment Program (8 Cal. Code Regs., §§3401-3411).</li> </ul>	Appendix Q, Subsection 1.2.4.2.3, p. 13	Yes	
Appendix B (i) (1) (A)	Tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein	Appendix Q, Subsection 1.3, Table E, pp. 19 to 28	No	See DR WS-1

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	conformance, with each law or standard during both construction and operation of the facility is discussed; and			
Appendix B (i) (1) (B)	Tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities.	Appendix Q, Subsection 1.5, Table G, p. 33; Appendix V, Table 2-1, pp. 3 to 6	Yes	
Appendix B (i) (2)	The name, title, phone number, address (required), and email address (if known), of an official who was contacted within each agency, and provide the name of the official who will serve as a contact person for Commission staff.	Appendix Q, Subsection 1.4, Table F, p. 32; Appendix V, Table 2-1, pp. 3 to 6	No	See DR WS-4
Appendix B (i) (3)	A schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Appendix Q, Subsection 1.5, Table G, p. 33; Appendix V, Table 2-1, pp. 3 to 6	Yes	

# **Attachment B**

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Data Requests

# Attachment B Data Requests

## MANDATORY OPT-IN REQUIREMENTS

California Code of Regulations (CCR), title 20, section 1877(f) requires Opt-In Applications to identify preliminary information demonstrating overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility, consistent with Public Resources Code section 25545.9. California Code of Regulations, title 20, section 1879 (a) (7) further states that the net positive benefits identified in an Opt-In Application may include, but are not limited to the following: (a) employment growth, (b) housing development, (c) infrastructure and environmental improvements, (d) assistance to public schools and education, (e) assistance to public safety agencies and departments, and (f) property taxes and sales and use tax revenues.

The application includes a Socioeconomic study (Appendix P, TN 258506) that uses IMPLAN and JEDI models, which both use an Input/Output modeling framework, to calculate gross positive economic benefits to San Bernardino County. However, the analysis does not provide a calculation of the *net* positive economic benefit to the local government (i.e., San Bernardino County) per the requirements of CCR, title 20, section 1877(f). The economic metrics provided for employment and tax revenue do not account for a net change in these metrics.

A net analysis should consider all project-related economic effects that result from a change in production or spending in the economy in the project area. A model that calculates net positive economic benefit would incorporate other economic impacts (or what are known as negative events in IMPLAN as described below) beyond the overall gross positive impacts of the project such as:

- The opportunity cost of investment in the proposed project;
- Projected cost of the county providing services (e.g., contracts with fire and police service providers, if any) to the project;
- Local economic development losses associated with the displacement of an existing energy source; or
- Potential increases or decreases in electricity rates or fuel prices resulting from project investments in new energy storage infrastructure.

A net analysis should also include the gain and loss of jobs when calculating the net employment impact. A net analysis will consider the differences of the economic outputs from a proposed project versus the outputs from the current or allowable planned use for the project site. Staff has had several discussions with IMPLAN, LLC, and has been informed that IMPLAN does calculate net benefits of projects by including multiple events in the analysis (e.g., including a negative dollar amount in an industry that is being replaced by the project, and a positive amount in the new industry or

project). Please refer to the example at <https://support.implan.com/hc/en-us/articles/360037695753-Net-Analysis-Switching-to-Solar-Energy>, which presents a use case scenario of net analysis for a solar project.

When demonstrating overall net positive economic benefit to San Bernardino County, the negative economic effects (i.e., negative “event” in IMPLAN) must be included. For example, the projected cost of the county providing public services (if any) to the project should be factored into the consideration of net benefits of the proposed project to the local jurisdiction. This is an example that can help provide information on the net benefits of the project. Specific assumptions for positive, negative, or neutral effects to the industry from the project must be made to properly estimate the net benefits.

**DR MAND-1.** Per California Code of Regulations, title 20, section 1877(f) requirement, please provide:

- a. Updated preliminary information that demonstrates overall ***net*** positive economic benefit to the local region (i.e., San Bernardino County).
- b. The assumptions used to run the economic model updates, including:
  - i. A list of specific assumptions (i.e., inputs) for the economic model (e.g., IMPLAN or additional assumptions outside of IMPLAN) that estimates net benefits (including positive and negative economic events). Note that a negative economic event is not necessarily a negative economic effect of the project. See above discussion for definition of negative event.
  - ii. The assumptions for all benefits identified, as well as the “negative events,” including employment growth, infrastructure improvements, and property and sales tax revenues.
  - iii. If IMPLAN is utilized, export the IMPLAN project configuration file and provide the downloaded .JSON file.

## **AIR QUALITY**

The California Energy Commission’s (CEC’s) jurisdiction and in lieu of authority is set forth in Public Resources Code section 25545.1 (b) (1). This authority permits any state or local air quality permit that would have been issued from the Mojave Desert Air Quality Management District (MDAQMD) to be incorporated into the CEC’s certification. To facilitate the District’s review of the project, the applicant shall file with the District, the information required to obtain relevant permits. To ensure the District’s requirements are contained in the CEC’s Environmental Impact Report (EIR) and certification, staff needs copies of all correspondence between the applicant and the District in a timely manner to stay up to date on any issues that arise prior to completion of the environmental document.

**DR AQ-1.** Please provide a completeness determination letter from the MDAQMD confirming that the application submitted to the District has been deemed

complete.

Ozone, PM10 and PM2.5 are designated as nonattainment in the Mojave Desert Air Basin. The application includes data on the ambient concentrations of ozone, PM10, and NO<sub>x</sub> measured at the Trona, Barstow, and Ridgecrest – Ward for the years 2020 to 2022. However, the applicant's chosen monitoring stations in the application only contain part of the needed pollutants. Staff requests a more complete dataset for ambient concentrations of pollutants near the project site, and within the same air basin.

**DR AQ-2.** Please provide the ambient concentrations of all criteria pollutants relevant to the project, i.e., ozone, PM10, PM2.5, carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), from the past three years, as recorded by the Air Resources Board-certified monitoring station(s) most representative of the project site.

The applicant uses the California Emissions Estimator Model (CalEEMod) to calculate air pollution emissions for both the construction and operational phases. However, the original CalEEMod modeling files are not provided. The applicant includes the AERMOD results for criteria pollutants only during the construction phase, but staff requires a dispersion modeling analysis to determine whether the air concentrations of these criteria pollutants from onsite stationary sources (e.g. 500-horsepower emergency generator) comply with state and federal Ambient Air Quality Standards (AAQS) during both the operational phase.

**DR AQ-3.** Please provide the CalEEMod source modeling file and results.

**DR AQ-4.** Please provide a screening level air quality modeling analysis, or a more detailed modeling analysis if so desired by the applicant, of all criteria pollutant concentrations including NO<sub>2</sub>, SO<sub>2</sub>, CO, PM10, and PM2.5 using a dispersion model such as AERSCREEN or AERMOD during operation of the project. Additionally, please provide the original source modeling files for both construction and operation.

**DR AQ-5.** Please provide the location of the proposed emergency generator, which shall be incorporated into the dispersion model as a point source.

**DR AQ-6.** Please provide a cumulative air quality modeling impacts analysis of the project's emergency generator in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process. Otherwise, provide justification for why a cumulative modeling analysis is not needed, considering things such as, engine emission rates, location of maximum impacts, distance from sensitive receptors and distance from other permitted sources.



## **GREENHOUSE GAS EMISSIONS (CLIMATE CHANGE)**

According to Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) a project can not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Staff needs more details on how the project would reduce GHG emissions, especially as it relates to the diesel-fueled emergency backup generator (backup generator) proposed as part of the project.

**DR GHG-1.** Explain how the proposed installation of a backup generator at the project site is consistent with the State of California's goal of achieving carbon neutrality no later than 2045.

**DR GHG-2.** What other technologies or fuel alternatives to diesel for the backup generator have you explored and why were they not pursued?

**DR GHG-3.** Has the project applicant explored the procurement of renewable diesel and/or carbon offsets as a means of demonstrating consistency with the State of California's goal of carbon neutrality? If not, why not?

Section 3.3 Air Quality (TN 267927) and Section 3.8 Greenhouse Gas Emissions (TN 257922) does not discuss whether the proposed circuit breakers and gas-insulated switchgear would contain sulfur hexafluoride (SF<sub>6</sub>). According to the California Code of Regulations, title 17, section 95350 through 95359.1, which became effective on January 1, 2022, starting on the applicable phase-out dates, no person may acquire SF<sub>6</sub> gas-insulated equipment (GIE) for use in California unless certain provisions apply:

1. An SF<sub>6</sub> phase-out exemption was approved by the Executive Officer of the California Air Resources Board (CARB), or SF<sub>6</sub> GIE were acquired in response to a failure, pursuant to section 95357.
2. The SF<sub>6</sub> GIE device was present in California and reported to CARB pursuant to section 95355(a) for a data year prior to the applicable phase-out date listed in Table 1 or Table 2.
3. The SF<sub>6</sub> GIE device was purchased by the GIE owner prior to the applicable phase-out date listed in Table 1 or Table 2 for the relevant GIE characteristics and enters California no later than 24 months after the purchase date.
4. The SF<sub>6</sub> GIE manufacturer replaces a defective SF<sub>6</sub> GIE device under the terms of the manufacturer's warranty.

Staff needs to confirm which of the four provisions the applicant would rely upon to comply with the current SF<sub>6</sub> phase-out regulation and what the applicable phase-out date is based on the proposed GIE characteristics.

**DR GHG-4.** Please confirm whether or not the project would use SF<sub>6</sub> in the circuit breakers and/or gas-insulated switchgear.

**DR GHG-5.** If the project is proposing to use SF<sub>6</sub>, please describe how the project would comply with the phase-out provisions.

Staff needs more information to better understand the direct and indirect GHG emissions associated with the battery energy storage system (BESS). If grid power is used to charge the BESS, staff needs to know the indirect GHG emissions associated with the loss in round-trip efficiency for charging/discharging and GHG emission intensity from the electrical grid during charging. Staff also needs more information to better understand the GHG emissions associated with BESS cooling.

**DR GHG-6.** Please provide the loss in round-trip efficiency for the charging/discharging cycle, and the GHG emission intensity factor during charging.

**DR GHG-7.** Please clarify whether GHG emissions will be associated with the BESS cooling. If emissions are expected, please provide the estimated amounts of these GHG emissions.

## **ALTERNATIVES**

California Code of Regulations, title 20, Division 2, Chapter 5, Appendix B (f) (1) requires that in accordance with Public Resources Code section 25540.6 (b), the application shall include a discussion of the applicant's site selection criteria, any alternative sites considered for the project, and the reasons why the applicant chose the proposed site.

**DR ALT-1.** Please provide a discussion of the applicant's site selection criteria, any alternate sites considered for the project (including a location map) but rejected and the reason why, and the reasons why the applicant chose the proposed site.

As noted in Chapter 4 Alternatives (TN 257936), Subsection 4.1, CEQA Section 15126.6 (a), requires an EIR to "describe a reasonable range of alternatives to a project, or to the location of a project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

**DR ALT-2.** Subsection 4.4 describes the No Project Alternative. Subsection 4.5, Visual Buffer Alternative, describes an alternative project configuration and provides a comparison of it to the proposed project. One option does not seem to provide a reasonable range of alternatives. Are there other alternative configurations or locations that deserve consideration?

As noted in Subsection 4.1, Introduction: "If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (Section 15126.6[e][2])"

**DR ALT-3.** Please identify an environmentally superior alternative and compare it to

the proposed project.

## **BIOLOGICAL RESOURCES**

**DR BIO-1.** Update the discussion in Section 3.4 Biological Resources (TN 257926), Subsection 3.4.1.2 page 3.4-5 and in Appendix D1 Biological Resources Technical Report (TN 257902) about fully protected species under California Fish and Game Code Sections 3511, 4700, 5050, and 5515 to reflect new legislation allowing take of some fully protected species under Senate Bill (SB) 147.

**DR BIO-2.** In Subsection 3.4.3.4, page 3.4-11 and 12, one California Rare Plant Rank List 4 plant may have been overlooked during the surveys. The Flora Compendium (Attachment B) in the Rare Plant Survey and Vegetation Mapping Report for the Soda Mountain Solar Project (Appendix E, TN 258460) included an unidentified muilla (*Muilla* sp.). This plant should have been identified to species because crowned muilla (*Muilla coronata*) is known from within approximately 10 miles of the project site. Crowned muilla has a California Rare Plant Rank of 4.2 and has a limited range in California. Crowned muilla is the only species of muilla known within 40 miles of the project site. Please address this species in these technical reports and disclose the locations and abundance of these observations.

**DR BIO-3a.** In Section 3.4, Subsection 3.4.3.5 page 3.4-13 concludes that Crotch's bumble bees are absent from the project area based on the field surveys, and indicates it is outside the known range. Staff notes the project is outside the known range of the species; however, this species has been observed in Death Valley as indicated on the range maps and recent iNaturalist records and recent surveys are detecting this species in new areas. Also, Appendix F Crotch's Bumble Bee Focused Survey Report for the Soda Mountain Solar Project / SWCA Project No. 68347 (TN 258460) notes two unidentified *Bombus* species were observed near the gen-tie line and as discussed in **DR BIO-3**, surveys have missed a period when more abundant floral resources were detected. Please change the occurrence potential for this species to Low rather than Absent.

**DR BIO-3b.** Appendix F stated that teams of three to four SWCA biologists performed four focused surveys during the colony active period (April to August) to allow for the highest probability of detection. Surveys were performed on May 22 to 26, June 14 to 16, July 16 to 18, and August 14 to 26, 2023. The surveys were focused on areas with the highest abundance of plants that may provide nectar for foraging bumble bees, specifically along the largest washes (See Appendix D, Figure 4, TN 258460). Nectar plants were recorded using a handheld global positioning system (GPS) unit. No bumble bees were captured or handled during survey efforts.

Please describe why no surveys were conducted during the early flight season (Feb, March, April, and most of May) when many foraging plants would be in bloom. Many annual species including Phacelias, Chaenactis, Asclepias, Amsinckia, Lupines, Eriogonums, and Salvia were detected during botanical surveys conducted by SWCA

(see The Flora Compendium (Attachment B from Appendix D, TN 258460) of the Rare Plant Survey and Vegetation Mapping Report for the Soda Mountain Solar Project (Appendix E, TN 258460). These plants can be used by this species. The survey areas identified in the report (See Figures 4, 5, and 6) appear to have focused on the remaining late season flowering plants. While staff concurs it is best to focus on the most likely areas, it appears the surveys may have overlooked an important period when flowering plants would have been abundant.

Please clarify if all the identified foraging plants (Fig 6) were subject to surveys. It appears based on the survey maps (Fig 4 and 5) that a large area on the southern portion of the site was not subject to surveys. Please also clarify how many surveys were conducted in each area (i.e., one pass only, twice, multiple, etc.). Staff noted that the second round of surveys focused on a specific wash.

**DR BIO 3c.** Please revise the Crotch's bumble bee conclusions in Section 3.4 of Subsection 3.4.3.5, page 3.4-13 given observation of this species in Death Valley as indicated on the range maps and the recent iNaturalist records and recent surveys are detecting this species in new areas. Furthermore, the two unidentified *Bombus* species noted as being near the gen-tie line and surveys missed a period when more abundant floral resources were detected.

The application did not clearly state if the applicant is seeking incidental take authorization as described in Fish and Game Code section 2081(b) and no mitigation measures were proposed. Will the applicant be applying for incidental take authorization for take of Crotch's bumble bee? Should a bumble bee nest be detected during pre-construction surveys on the project site, work would be paused until take authorization could be granted. If take authorization will be sought, data that shall be provided includes:

- a. Common and scientific names of the species to be covered by the incidental take permit (ITP) and the species' status under the California Endangered Species Act (CESA).
- b. A complete description of the project or activity for which the permit is sought.
- c. The location where the project or activity is to occur or to be conducted.
- d. An analysis of whether and to what extent the project or activity for which the permit is sought could result in the taking of species to be covered by the permit.
- e. An analysis of the impacts of the proposed taking on the species.
- f. An analysis of whether issuance of the ITP would jeopardize the continued existence of the species. A complete, responsive jeopardy analysis shall include consideration of the species' capability to survive and reproduce, and any adverse impacts of the taking on those abilities in light of:
  - i. Known population trends;

- ii. Known threats to the species; and
  - iii. Reasonably foreseeable impacts on the species from other related projects and activities.
- g. Proposed measures to minimize and fully mitigate the impacts of the proposed taking.
  - h. A proposed plan to monitor compliance with the minimization and mitigation measures and the effectiveness of the measures.
  - i. A description of the funding sources and the level of funding available for implementation of the minimization and mitigation measures.

**DR BIO-4.** The statement in Section 3.4.3.5 page 3.4-14 and the Appendix D1 Biological Resources Technical Report (TN# 257902) that “All the tortoise burrows found were collapsed and/or showed no sign of recent activity” needs to be revised. Based on the survey data provided the burrows are not all collapsed but include a range of conditions from Class 2 through 5. While the report figures show the classification system it is recommended the language be changed to “The tortoise burrows showed no recent sign of use, and some were collapsed.” Recommend making the same change in Appendix G Desert Tortoise Survey Report for the Soda Mountain Solar Project / SWCA Project No.68347 (TN 258460).

Please also clarify if the potential mammal and owl burrows noted in Figure 2 (Location of live burrowing owl observation, unknown mammal burrows, and desert kit fox and American badger dens identified within the study area) of the Burrowing Owl, Desert Kit Fox, and American Badger Survey Report for the Soda Mountain Solar Project / SWCA Project No. 068347-002 (Appendix N) (TN 258459), were included as potential desert tortoise burrows in the desert tortoise survey report. Based on a review of the figures there appears to be additional and or different burrow locations. It is uncertain to staff if these are accounted for in the most recent report. Desert tortoise survey guidelines note that all potential burrows should be considered as possible desert tortoise burrows. While the report clearly states that desert tortoise can use other burrows staff recommends that the report clearly indicate the presence of large numbers of other suitable burrows. Similarly, desert kit fox, American badger, and burrowing owl can and do use desert tortoise burrows.

**Translocation areas for desert tortoises.** Please identify if desert tortoise surveys have been completed for the proposed translocation area identified in the January 13, 2016, Biological Opinion for the Soda Mountain Solar Project. Please clarify if any other studies have been conducted in this location. If surveys have not been conducted, please identify when an assessment of this area including surveys for desert tortoise (at minimum burrows and sign if completed out of season) will be conducted.

**DR BIO-5.** Section 3.4.3.5, page 3.4-14 (TN# 257926) discusses the Mojave fringed-toed lizard. Please clarify why surveys for Mojave fringe-toed lizards were not conducted in the two small areas of aeolian sand deposits (2.1 acres and 4.8 acres) mapped by SWCA located in the southern portion of the project area. In addition, based on a review of aerial photos it appears that many of the small drainages located in the southern portion of the project site contain windblown sand. Please clarify if these areas provide dispersal habitat for this species. While populations of lizards in small patches of sand are at greater risk of extirpation they can be used by this species. In addition, this species is capable of dispersal over non aeolian surfaces and may be present in the area. These areas should be evaluated, and the species considered to have an increased potential to occur in and near the southern arrays.

**DR BIO-6.** Subsection 3.4.3.5, page 3.4-15 (TN# 257926) discusses avian use. Staff acknowledges the extensive work conducted by the applicant to update biological resource data after coordinating with CDFW. Staff noted different conclusions and survey results between the various reports. Staff requests that any resource data detected during previous surveys such as the number of avian species be summarized in the Biological Resources Technical Report (Appendix A, 2013 Panorama Environmental Inc. Biological Resources Technical Report TN 258461) and Impact Analysis. For example, page 3.4-15 (Avian Use) of the Impact Analysis and Section 4.4.2.3.1 Local Bird Use of the Biological Resources Technical Report should include the avian data collected during previous studies as a reference to compare against the data collected during the most recent surveys. It was noted that previous avian data identified a higher number of birds compared to the most recent data. In addition, the Bureau of Land Management (BLM) approved Environmental Impact Statement (EIS) and previous technical documents such as the Panorama Biological Technical Report (TN# 258461) included a more thorough discussion of migratory waterbirds. Please update the impact analysis in Section 3.4 (TN 257926) to include other potential migratory birds such as Yumas Ridgeway rail and who may overfly the area.

**DR BIO-7.** Section 3.4.3.5, page 3.4-16 (TN# 257926) discusses bats. Staff requests that any resource data detected during previous bat surveys be summarized in the Biological Resources Technical Report and Impact Analysis. Include a description of Townsends big-eared bat (*Corynorhinus townsendii*) in this section. In addition, there are a number of other sensitive bat species known from the Mojave Desert that while not detected should be considered as periodic foragers. These include California leaf-nosed bat (*Macrotus californicus*) and Western mastiff bat (*Eumops perotis californicus*).

**DR BIO-8.** Section 3.4.3.5 (TN 257926). There is no mention or impact analysis for mountain lion. Section 4.4.2.4.2 (Mountain Lion) TN# 257902 of the Biological Resources Technical Report dismisses this species. This species should not be discounted and dismissed from analysis. Identifying the mountain lion as absent

based on the lack of California Natural Diversity Database (CNDDDB) records and no species observation during other surveys is misleading. This is a difficult species to detect, they are far ranging in the desert, and there was a historic roadkill nearby (Appendix D2 Desert Bighorn Sheep Study, TN 257948, Section 3.2, Exhibit 1). As stated in the report, this species could occur as a transient; therefore, the mountain lion should be considered for analysis in the environmental documents.

**DR BIO-9.** Section 3.4.3.5(TN 257926) does not mention or provide an impact analysis for ringtail. A discussion of ringtail (*Bassariscus astutus*), a State Fully Protected Species, should be included in the reports and impact analysis. This species, while closely associated with water resources, is known from the region with direct observations at Zzyzx. Considering the proximity to this location and the other springs and caves in the region a more thorough discussion of this species is warranted. Likewise, the introduction of new watering sources as mitigation to support desert bighorn sheep would likely be an attraction to this species. Update this section to include a discussion of and assessment of potential impacts to ringtail.

**DR BIO-10.** In reviewing Section 3.4.3.5 staff observed that the CDFW jurisdictional footprint is different depending on the report that is reviewed. Staff noted that the most recent Aquatic Resources Delineation (TN#257933) provides the most robust methodologies and description of CDFW jurisdictional waters on the project site compared to the features previously mapped in other reports. Staff understands this is the proposed map that would be used for regulatory permitting and impact analysis. Staff would like clarification on drainages that occur in the southern portion of the project site. For example, in the 2013 Panorama Environmental, Inc. Biological Resources Technical Report (TN# 258461-Appendix D4 - Appendix A to 2024 Biological Resources Technical Report) Figure 3.4-2 (Waters of the State 2009) presents the smallest acreage of CDFW waters while Figure 3.4-3 Waters of the State (2012) include substantially more waters. Each of these maps show the presence of CDFW waters in the lower portion of the project site. In the most recent delineation (TN#257933) some large features mapped in previous studies are not included and there appears to be some type of feature present based on a cursory review of aerial maps. See Figure 25 (Prominent and non-prominent channels) and Figure 26 (Aquatic resources inventory map). Staff intends to conduct a field verification of the delineation in the near future but requests additional information for why these areas were not included.

**DR BIO 11.** Section 3.1.2 in Appendix D1, Biological Resources Technical Report (TN 257902) page 17-18 discusses the potential for occurrence for special-status species. Staff requests the term Absent be changed to Not Likely to Occur. Absent should only be used for species where this is no habitat, it is completely out of the expected range, and was not detected during surveys. The term "unequivocal negative results" in the text of the report are misleading and likely incorrect as even the most skilled botanists and wildlife biologists do not see every species and even

during good rain years not all plant occurrences may bloom.

**DR BIO-12.** Does the Biological Opinion issued for the approved project need to be updated and or revised based on the timing and or project revisions such as battery storage?

**DR BIO-13.** The impact statement in Section 3.4, Subsection 3.4.4.4, page 3.4-38 does not address impacts to State jurisdictional waters. As identified in the most recent delineation in Appendix E1 Aquatic Resources Delineation (TN 257933), the proposed project would result in direct and indirect impacts to features under the jurisdiction of the State Water Board and the CDFW. Subsection 3.4.4.4 must be revised to provide an assessment of impacts and propose mitigation to minimize impacts to these features. Please provide project designs and identify each of the drainages that would be subject to impacts consistent with current CDFW requirements.

**DR BIO-14.** Section 3.4, Subsection 3.4.5, pages 3.4-45 to 3.4-46, MM BIO-6: Fence Design and Site Permeability states that 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. The measure proposes to allow access to small mammals by lifting the fence. In addition, the measures state that "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." These gaps would also allow small desert tortoise to enter the site. Please clarify if the intent of the applicant is to allow desert tortoise back into the project site post construction.

**DR BIO-15.** Regarding road closures, will there be a bypass or other access road available to the public when or if Razor Road is closed? Figure 2 of Appendix E2 Aquatic Resources Assessment (TN# 257904) and Figure 2-6 of Chapter 2 Project Description (TN# 257912) show the arrays overlying this road. Conversely, the January 13, 2016, Biological Opinion for the Soda Mountain Solar Project (see Figure 2, Translocation areas for desert tortoises) shows Razor Road to be unobstructed. Please clarify if this road will be blocked and or rerouted. Please ensure that all impact analysis and all relevant reference documents include maps that are consistent and identify an accurate disturbance footprint.

**DR BIO-16.** Ongoing Surveys. Please inform the CEC what if any surveys are currently proposed or underway that are not included in the current application data.

**DR BIO-17.** The impact analysis for desert bighorn sheep in Section 3.4, page 3.4-34 indicated that night work is not expected to occur. However, the second paragraph on page 2-17 in Chapter 2, Section 2.5.1 (TN 257912) states that to meet schedule demands or to reduce impacts, it may be necessary to work early



mornings, evenings, or nights and on weekends during certain construction phases. Please provide a detailed schedule of when night work is expected to occur and include a more thorough analysis of impacts to all wildlife species from conducting work during periods of darkness.

**DR BIO-18.** Vegetation Community Impacts. Table 6. Total Impacts to Vegetation Communities in the Study Area, identified in the Biological Resources Technical Report must be included in Section 3.4 to properly identify impacts to vegetation and landforms. Please revised Table 6 to include the total acreage of disturbed areas such as roads or other disturbed areas.

**DR BIO-19.** Please provide an aerial map of the isopleth graph depicting nitrogen deposition within a 6-mile radius expected to occur when back up generators are used. Otherwise, provide justification for why the graph and modeling is not needed.

**DR BIO-20.** Appendix D2 Desert Bighorn Sheep Study (TN 257948). This CDFW report identifies that project related impacts to desert bighorn sheep can be mitigated with the implementation of the measures proposed by CDFW. This includes Mitigation Measure BIO-6 (Fence Design and Site Permeability), which requires additional fencing that may require additional permitting with the BLM and Caltrans. In addition, BIO-23 (Project Footprint Setback) Section 7.9 (Project Footprint Revision) requires the East Array stay outside of the 0.25-mile setback from the 10 percent slope. Specially the language states "Prior to project approval, the project will reconfigure the East Array alignment to stay outside of the 0.25-mile setback. This includes fencing and permanent infrastructure (e.g., roads). Smaller currently proposed encroachments may remain with the exception of the fencing intrusion between South Array 1 and South Array 2. Solar arrays lost during the reconfiguration of East Array may be added elsewhere so long as they do not additionally encroach upon the setback.

Implementation of all mitigation measures identified in the Desert Bighorn Sheep report would be required to reduce impacts to less than significant levels. Staff requests that the applicant provide an assessment of the feasibility of this mitigation as a viable alternative to the currently proposed project footprint.

## **CULTURAL AND TRIBAL CULTURAL RESOURCES**

**DR CUL/TRI-1.** A discussion of the methods used in the Class III inventory mentioned in Section 3.5 Cultural Resources, p. 16, regarding archaeological resources was not provided. Additionally, please provide an estimated approval date for the two reports mentioned that are under BLM review. Please provide this information in accordance with the California Code of Regulations, title 20, section 1704 (a) (3) (B).

**DR CUL/TRI-2.** The application does not provide a discussion of indirect impacts to cultural, tribal, and historic architectural cultural resources, a discussion of direct

and indirect impacts associated with project maintenance activities. Please provide this information in the application, in accordance with Appendix B (g) (1).

**DR CUL/TRI-3.** The application needs to discuss, in similar detail to that given the Early Holocene, the chronological periods following the Early Holocene, with an emphasis of no more than a 5-mile radius from the project location. In addition, the application does not specifically address the potential for buried cultural and tribal cultural resources, nor is there any explanation about how the results of the record search and literature/archival research was used to inform the pedestrian survey methods. Please provide this information. This is required by Appendix B (c)(2)(A).

**DR CUL/TRI-4.** Identify the individuals responsible for the records searches and whether they meet the Secretary of the Interior's standards for cultural resource professionals. Please provide this information in accordance with Appendix B (g) (2) (B).

**DR CUL/TRI-5.** Please describe efforts to identify cultural and historic architectural resources listed or recognized by a city, county, or local historical and archaeological societies or museums. Please provide this information in accordance with Appendix B (g) (2) (B).

**DR CUL/TRI-6.** The previous cultural resource studies are listed in Subsection 3.5.5.1 of the application, but copies of the reports and associated site records are not included in a confidential cultural resource filings provided with the application, nor is any record search information included in Section 3.18 Tribal Cultural Resources. Please include record search information in Section 3.18 and provide copies of all reports, site records, and a results map or explain why they do not need to be part of the application. Please provide this information in accordance with Appendix B (g) (2) (B).

**DR CUL/TRI-7.** In accordance with CEC regulations, Appendix B (g) (2) (c), a cultural resources survey of the project area must be conducted within the last 5 years; thus, the current methods are inadequate. The previously completed surveys discussed in Confidential Appendix F conducted in 2023 at the reconnaissance level, and in 2024, limited intensive pedestrian survey of 54 acres, did not provide survey coverage of the entire project area and buffers as required by Appendix B (g) (2) (c). Please provide the methods and results of an intensive pedestrian survey, completed by (or under the direction of) individuals who meet the Secretary of the Interior's Professional Standards, inclusive of the project site and project linear facility routes, extending to no less than 200 feet around the project site, substations and staging areas, and to no less than 50 feet to either side of the right-of-way of project linear facility routes. This information will need to also be included in an updated technical study in accordance with Archaeology Resource Management Reports (ARMR) Guidelines.

**DR CUL/TRI-8.** In accordance with CEC guidelines, Appendix B(g)(2)(c) a cultural resources survey of the project area must be conducted within the last 5 years. The existing survey appears to have been mostly based on documenting resources previously identified in an outdated 2009 report and does not include the methods and results of a new survey of the entire project site and built environment 0.5-mile buffer; thus, the current methods are inadequate as some resources may have reached the 45 year age threshold since 2009. The previously completed survey discussed in Confidential Appendix F and G do not provide adequate coverage of the project area. Please provide the methods and results of an updated historic architectural survey in accordance with Appendix B(g)(2)(C). This information will need to be incorporated into an updated historic resources assessment report.

**DR CUL/TRI-9.** The record search results are summarized in the technical studies found in Confidential Appendices F and G, but do not include the results of contacting local museums, societies, or reviewing local registers and copies of the reports and associated site records. Please update the record search results for both the archaeology and historic architectural study and provide copies of all reports and site records in accordance with Appendix B (g) (2) (B).

**DR CUL/TRI-10.** Please include copies of all new and updated Department of Parks and Recreation (DPR) 523(A) forms from resources identified during the requested intensive pedestrian survey found in DR CUL/TRI-9 and DR CUL/TRI-10 in accordance with Appendix B (g) (2) (C).

**DR CUL/TRI-11.** Preliminary research conducted by CEC staff suggests that numerous built environment features, primarily linear features, were not identified in Confidential Appendix G. CEC staff, using historic maps and aeriels, have identified the following 45+ year old built environment linear features that were not identified in any docketed cultural resource report within the 0.5-mile built environment study area and/or within the project site. Please confirm these findings with a historic architectural survey. If confirmed, these features need to be added to the historic resources assessment report, recorded on the appropriate DPR 523 forms, and evaluated for significance under the California Environmental Quality Act (CEQA). The linear features include:

- Unrecorded segment of pre-1933 Arrowhead Trail southwest of Beacon Station in Sections 14 and 15, T12N, R7E.
- Razor Road east of historic post-1933 Arrowhead Trail alignment in Section 12, T12N, R7E.
- Unnamed road alignment depicted on the 1983 USGS West of Soda Lake map in T12N R7E, leading in a southeasterly to northwesterly direction from Section 14 on the south to a building in Section 10 on the north.

- Two trails depicted on the 1983 USGS West of Soda Lake map in T12N R7E that begin in Section 14 and then split, leading in a southerly and southeasterly direction.
- Poles on the north side of the I-15 Freeway identified as P-36-028522, an electrical transmission line. Site records note that these poles parallel Arrowhead Trail (CA-SBR7689H or P-36-007689). Research indicates that this pole alignment could be the first telephone line constructed in 1929 between San Bernardino and Las Vegas in association with the construction of Boulder Dam.

**DR CUL/TRI-12.** Additional unrecorded historic-age properties not identified in **DR CUL/TRI 11** within a 0.50-mile radius of the proposed project may exist based on a review of official BLM records. Consultation of a single BLM Master Title Plat for T13N, R7E identified the following resources. Please determine, through research and historic architectural survey, whether historic-age features remain at the locations specified below. If so, these features need to be added to the historic resources assessment report, recorded on the appropriate DPR 523 forms, and evaluated for significance under CEQA.

- Road alignment depicted running in a southeasterly to northwesterly direction passing through Section 36, T13N, R7E. This alignment is depicted on the historic 1956 Soda Lake USGS topo map. It is identified on the BLM Master Title Plat for T13N, R7E as CACA 48433 7' FHWA 8/27/1958.
- Pipeline in Section 36, T13N, R7E.

Please also check the data presented on BLM Master Title Plat T13N, R8E, BLM Master Title Plat for T12N, R7E, and BLM Master Title Plat for T12N, R8E to determine that all listed features have been surveyed, recorded and evaluated. If not, please survey and update site records and reports in accordance with Appendix B (g) (2) (C).

**DR CUL/TRI-13.** There are errors in the applicant's historical research in the text of Confidential Appendices F and G. Please correct these errors in all cultural reports and site records, as identified below.

- Misidentification of the original owners of Beacons Station within the project-built environment buffer, as Mr. and Mrs. Frank Millett of Las Vegas. CEC staff research has confirmed that Millett's owned the Beacon Light Service Station in Daggett.
- Arrowhead Trail Highway is referred to in numerous ways in Confidential Appendices F and G as State Route 91/US 466 and/or as US 91/US 466. The alignment is correctly identified as US 91/US 466. Please change as appropriate throughout all cultural reports and DPR 523s.

**DR CUL/TRI-14.** After conducting new surveys (**DR CUL/TRI-7** and **DR CUL/TRI-8**), please include in the archaeological and historic resources assessment

technical reports an updated map at a scale of 1:24,000 (U.S. Geological Survey topographic quadrangle) depicting the locations of all previously known and newly identified cultural and tribal cultural resources compiled through the research required by Appendix B (g)(2)(B) and Appendix B (g)(2)(C) (ii), and in accordance with Appendix B (g) (2) (C).

**DR CUL/TRI-15.** Please include the names and qualifications, in both Confidential Appendices F and G, of all cultural resource specialists, in accordance with Appendix B (g)(2)(C)(v), who were responsible for contributing to the record search.

**DR CUL/TRI-16.** Please provide, as part of the application, a copy of the applicant's request to the Native American Heritage Commission (NAHC), and copies of any correspondence received from the NAHC in accordance with Appendix B (g) (2) (D) (i).

**DR CUL/TRI-17.** Please provide, as part of the application, a copy of the applicant's correspondence sent to tribal representatives on the NAHC contact list and copies of all responses, including a summary of any oral responses, in accordance with Appendix B (g) (2) (D) (i).

**DR CUL/TRI-18.** Pertaining to Subsection 3.18.3.3, the statement, "...CDFW as lead agency..." is incorrect in a CEC application. While it is ok to summarize past consultation efforts in the application, it should be clearly stated that CEC as the lead agency will conduct their own independent tribal consultation. Please correct this in the application.

**DR CUL/TRI-19.** Please update or revise the applicant proposed measures in the application, as needed, once new archaeological and historic architectural surveys are completed.

**DR CUL/TRI-20.** Please revise the measure pertaining to an educational program designed to enhance employee awareness to protect cultural and tribal cultural resources to also include operations of the of the proposed project in accordance with Appendix B (g) (2) (E) (ii).

**DR CUL/TRI-21.** Please provide a table of Laws, Ordinances, Regulations and Standards (LORS) with a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance with each law or standard during both construction and operation of the facility is discussed in accordance with Appendix B (i) (1) (A).

## **EXECUTIVE SUMMARY**

Appendix B (a) (1) (C) requires a description of and maps depicting the region, the vicinity, and the site and its immediate surroundings. Limited description and no maps depict the existing electrical distribution line, wireless cellular telephone towers, two

fiber-optic cables, and two fuel pipelines.

**DR ES-1.** Update Figure 2-2 to include the existing electrical distribution line, wireless cellular telephone towers, two fiber-optic cables, and two fuel pipelines.

Appendix B (a) (1) (D) requires a full-page color photographic reproduction depicting the visual appearance of the site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction. A full-page photographic reproduction before construction and simulation or artists rendering of the site after construction with the project components were not provided.

**DR ES-2.** Please provide a full-page color photographic reproduction depicting the visual appearance of the project site prior to construction, and a full-page color simulation or artist's rendering of the site and all project components at the site, after construction. This should clearly show the project site, including all project components. It may be useful to show the photographic simulation from an angle and at a vantage point that will show the project components.

Appendix B (a) (1) (E) requires a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1,000 feet of the proposed powerplant and related facilities. The site addresses for parcels within 500 feet of the proposed transmission line and other linear facilities, and within 1,000 feet of the proposed powerplant and related facilities were provided, however, no mailing address for the parcel owner was included.

**DR ES-3.** Provide a list of the mailing address of all owners for all parcels within 500 feet of the proposed transmission line and other linear facilities and within 1,000 feet of the proposed power plant and related facilities.

Several details required by Appendix B (a) (2) about the project schedule were not included in the application, specifically, dates of initiation and completion of construction, initial start-up, and full-scale operation of the proposed facilities.

**DR ES-4.** Provide a more specific proposed date of initiation of construction than 2025 (e.g. Spring 2025, Quarter 2 of 2025). Provide the proposed dates of initial start-up and full-scale operation of the proposed facilities.

## **GEOLOGICAL HAZARDS**

Appendix B (i) (1) (A) requires that the application include a table that identifies the applicable laws, ordinances, regulations and standards (LORS). Table 2.2 of Appendix V Supplemental Information (TN 257943) lists the regulatory setting sections for each technical section but does not list the individual LORS. Section 3.7 Geological Hazards does not include a list the individual LORS.

**DR GEO-1.** Please list the individual applicable LORS in a table within Section 3.7.

Appendix B (i) (1) (B) requires that the application include a table of agencies that would issue permits or enforce LORS but for CEC's exclusive authority to certify this facility, and Appendix B (i) (2) requires the contact information for any such agencies. Appendix B (i) (2) requires the inclusion of a schedule to obtain permits outside CEC authority.

While Table 2.1 of Appendix V lists the permits the applicant considers to be necessary of the project, this table does not indicate if any permits would be required for geologic hazards. If permits are not required for geologic hazards, a discussion explaining why they are not required should be included in the technical section. In addition, contact information for any state or local agencies that would be responsible for enforcing LORS related to geological hazards should also be included.

**DR GEO-2.** Please include discussions of why permits would not be applicable and any related agency enforcement contact information within Section 3.7.

## **HAZARDOUS MATERIALS HANDLING**

Subsection 3.9.3.4, Table 3.9-1 in Section 3.9 Hazardous Materials provides essential information on the materials, uses, and toxicity of hazardous materials that would be used during the construction and operation of the proposed project. However, the table provides no specific information regarding the quantities of hazardous materials that would be stored on site during construction and operation.

**DR HAZ-1.** For Table 3.9-1, please provide the quantities of hazardous materials stored on site during construction and operation of the project.

The application contains Figure 3.9-1 depicting the location of schools, hospitals, daycare facilities, and long-term health care facilities, within the area potentially affected by any release of hazardous material. However, the scale of Figure 3.9-1 is 1:800,000, and the application does not contain a figure depicting these items at a scale of 1:24,000.

**DR HAZ-2.** Please provide a figure with a scale at 1:24,000.

The application contains discussion of the regulation governing process safety management of acutely hazardous materials (8 CCR 5189). However, it does not contain a discussion of whether a risk management plan (Health and Safety Code § 25531 et seq.) would be required.

**DR HAZ 3.** Please discuss whether a risk management plan (Health and Safety Code § 25531 et seq.) would be required, and if so, the requirements that would be incorporated into the plan.

The fire and explosion discussion in Subsection 3.9.3.4 (Impact HAZ-2) does not discuss

potential impacts of lithium battery fires on nearby Interstate 15 (I-15). The project would increase potential for an accident involving lithium batteries near the project site (either on I-15 or at the BESS location that is within 0.5 mile of I-15). A recent semi-truck accident near the project site resulted in a lithium battery fire that caused the shutdown of I-15 from late July 26, 2024 – to early July 28, 2024, with major impacts on stranded motorists. Few alternative routes to I-15 exist near the project site. An on-site fire at the PG&E Elkhorn lithium battery plant closed Highway 1 for 12 hours. The batteries at the Elkhorn plant are closer to the highway (some as close as 0.07 miles from Highway 1).

**DR HAZ 4.** Please discuss actions that the project could implement to reduce the probability of lithium battery fires on I-15 and actions to reduce the impact of such fires (if they would occur) to motorists.

**DR HAZ 5.** Please discuss whether a lithium battery fire at the project BESS site would result in the closure of nearby I-15. Would a fire at the BESS have smoke, visibility, or inhalation risks that could result in the closure of I-15? What actions could be implemented to reduce this risk and potential impacts to motorists?

Subsection 3.9.1 of the application identifies the regulatory setting of the project, but it does not contain discussion regarding applicability to the project, and project conformance.

**DR HAZ-6.** Please provide tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each.

Appendix V, Table 2-1 does not include any permits that may be required by the County of San Bernardino Fire Department.

**DR HAZ-7.** Please identify any permits that would be required by the County of San Bernardino Fire Department as related to hazardous materials, but for the exclusive authority of the Commission to certify sites and related facilities.

Appendix V, Table 2-1 does not include contact information for the County of San Bernardino Fire Department.

**DR HAZ-8.** Please provide name, title, phone number, address(required), and email address (if known), of an official at the County of San Bernardino Fire Department who would serve as a contract person for Energy Commission staff.

Appendix V, Table 2-1 does not include information about the schedule for obtaining permits or approvals from the San Bernardino County Fire Department.

**DR HAZ-9.** Please create a schedule for obtaining permits and approvals from the



County of San Bernardino Fire Department and any steps the applicant has taken or plans to take to obtain such permits.

## **LAND USE**

CEC Siting Regulations Appendix B (g)(1) requires the application to provide a discussion of the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation. Section 3.11 (TN 257908) of the application states that the BLM issued a Record of Decision (ROD) in March 2016 to approve the proposed project and to adopt the project-specific mitigation measures. The BLM's 2016 ROD for the proposed project was not included in the application files, but was found on the BLM's National NEPA Register at: <https://eplanning.blm.gov/eplanning-ui/project/66043/570>. The ROD identifies the adopted mitigation measures for the project that would be included in the BLM Right-of-Way (ROW) Grant authorization once issued (ROD Appendix 4), as well as the project's Environmental Construction and Compliance Monitoring Program (ROD Appendix 5). The adopted mitigation measures may be applicable to the CEQA Land Use analysis for the proposed project because they may include siting and construction measures that would be incorporated into the project to reduce or avoid an environmental impact.

**DR LAND-1.** Please docket the full BLM ROD, including appendices, for the Soda Mountain Solar Project (March 2016).

CEC Siting Regulations Appendix B (g)(3)(A)(iv) requires the application to include legible maps of the areas identified in subsection (g)(3)(A) potentially affected by the project, on which existing land uses, jurisdictional boundaries, general plan designations, specific plan designations, and zoning have been clearly delineated. Staff reviewed the figures included with the application, and based on a review of the BLM's online mapping system, the area mapped as BLM land in TN 257912, Figure 2-3 (Public Land Survey location) is incorrect in that it indicates the northernmost portion of the project site includes land that is not managed by the BLM. The BLM's interactive online map system (<https://www.blm.gov/maps/frequently-requested/california>) shows that this northernmost portion of the project site is located on BLM-managed land.

**DR LAND-2.** Please correct Figure 2-3 to reflect the land management data that is most up-to-date and to show that the project site would be located entirely on BLM-managed land. Provide the associated updated Geographic Information System (GIS) shape files.

CEC Siting Regulations Appendix B (g)(3)(B) requires the application to discuss the proposed project's conformity with any long-range land use plans and policies adopted by any federal, state, regional, or local planning agencies. Similarly, CEC Siting Regulations Appendix B (i)(1)(A) requires the application to provide tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land

use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The intent of these siting regulations along with the CEQA Guidelines Appendix G, XI Land Use and Planning, checklist question (b), is to allow for an analysis of project impacts by applying land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect (14 Cal. Code Regs. Tit. 14, div. 6, ch. 3 app G).

Long-range land use plans applicable to the project site include: the Desert Renewable Energy Conservation Plan (DRECP) Land Use Plan Amendment (LUPA), and the Designation of Energy Corridors on BLM-Administered Lands in 11 Western States (West-Wide Energy Corridor ROD). These land use plans were developed consistent with the BLM Land Use Planning Handbook (H-1601-1) to guide future BLM planning decisions in accordance with the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1711-1712). Below is a discussion of the types of policies or management actions from each plan that would be applicable to an analysis of project consistency with land use plans, policies, or regulations intended to avoid an environmental effect, as follows:

- **DRECP LUPA.** The project site is within the planning boundary of the California Desert Conservation Area (CDCA) Plan as amended by the DRECP. The DRECP LUPA contains Conservation and Management Actions (CMAs) that prescribe the allowable uses and management activities for each land use designation within the DRECP. As stated in Section 3.11.1 of the application (TN 257908), the proposed project would be located within two DRECP land use designations: Area of Critical Environmental Concern (ACEC) and General Public Lands (GPL). The DRECP LUPA identifies CMAs for each of these land use designations that are designed to mitigate siting, design, pre-construction, construction, maintenance, implementation, operation, and decommissioning activities on BLM land. As such, applicable CMAs would include LUPA-wide CMAs, ACEC-specific CMAs, and GPL-specific CMAs.

The proposed project application does not provide a discussion of the project's conformity with the DRECP LUPA CMAs. Page 3.11-10 of the application (TN 257908) states, "...[t]he project, including the solar facility and gen-tie line would be consistent with the CDCA as amended by the DRECP LUPA, and its CMAs including for the ground disturbance within the ACEC." However, the application does not list the DRECP land use policies or regulations (i.e., CMAs) applicable to the project nor does it explain how the project would be consistent with those plans and policies. A description of the applicable CMAs and an explanation of the project's conformity is necessary to support the CEQA Land Use analysis. The application also states that because the BLM ROD for the project pre-dates the adoption of the DRECP LUPA, the CMAs would not apply to the project (see TN 257912, Section 2.3.1.2). These two statements from the application conflict with each other.

A review of the BLM's *Record of Decision for the Soda Mountain Solar Project and Amendment to the California Desert Conservation Area Plan* (March 2016) shows that the BLM-approved Soda Mountain Solar Project does not include a 300-MW battery energy storage system (BESS) as currently proposed in the application before the

CEC. Furthermore, the *Soda Mountain Solar Project Proposed Plan Amendment/Final Environmental Impact Statement/Environmental Impact Report* (June 2015) does not include the BESS component of the Soda Mountain Solar Project as currently proposed. In addition to the BESS being reviewed under the CEC's EIR, staff assumes that the inclusion of the BESS component of the proposed project may trigger further environmental review under NEPA. Any subsequent environmental review would be subject to the CDCA's amended policies and mitigation requirements (i.e., CMAs) that were adopted through the DRECP LUPA.

- **West-Wide Energy Corridor ROD.** The West-Wide Energy Corridor ROD amended 92 BLM Resource Management Plans in 11 Western States, including the CDCA Plan. The West-Wide Energy Corridor ROD includes Interagency Operating Procedures (IOPs) that are designed to avoid or minimize environmental impacts during the siting and construction of individual energy projects within a designated Section 368 energy corridor. Section 3.11 of the application (TN 257908) includes a description of the West-Wide Energy Corridor ROD but does not discuss the project's conformity with the IOPs. A description of the applicable IOPs and an explanation of the project's conformity is necessary to support the CEQA Land Use analysis.

Furthermore, the application does not discuss a proposed amendment to BLM's West-Wide Energy Corridor that may impact future land use planning decisions by federal agencies for energy projects. On December 1, 2023, the BLM issued a Notice of Intent in the Federal Register to *Amend Resource Management Plans for Section 368 Energy Corridor Revisions and Prepare an Associated Environmental Impact Statement*. The proposed changes include adjustments to energy corridor designations and revisions to IOPs, and would affect energy corridors within the CDCA planning area. These changes would follow the recommendations of an April 2022 report jointly prepared by the BLM, U.S. Forest Service, and Department of Energy entitled *Energy Policy Act of 2005 Section 368 Energy Corridor Review Final Report: Regions 1-6* (Section 368 Energy Corridor Final Report). According to the Section 368 Energy Corridor Final Report, the recommended new or revised IOPs "...could be adopted as best management practices in local land use plans or at the project level to minimize potential impacts." Therefore, the BLM may choose to incorporate the proposed IOP revisions, where applicable, into the permit conditions for the proposed project's ROW Grant authorization because IOPs are intended to have mitigative effects. A list of applicable IOPs are needed to conduct staff's Land Use analysis consistent with the BLM's permit conditions to reduce an environmental effect.

**DR LAND-3.** Please provide the following information to support the CEQA Land Use analysis of project consistency with land use plans, policies, and regulations adopted for the purpose of mitigating an environmental effect:

- a. Provide a list of applicable CMAs from the DRECP LUPA and applicable IOPs from the West-Wide Energy Corridor ROD. For each applicable CMA or IOP, explain how the project would comply with the requirements of that measure.

- b. Please identify the extent to which BLM would apply the new and/or revised IOPs from the Section 368 Energy Corridor Final Report to the proposed project's ROW Grant authorization. Identify any new or revised IOPs from the Section 368 Energy Corridor Final Report that could be incorporated into the BLM's permit conditions for the project's ROW Grant authorization.

Public Resources Code section 25529.5 requires (a) if the site and related facilities specified in the application are proposed to be located within 1,000 feet of a military installation, or lie within special use airspace or beneath a low-level flight path, as defined in Section 21098, the applicant shall inform the United States Department of Defense (DoD) of the proposed project and that an application will be filed with the commission; and (b) if provided by the DoD, the applicant shall include within the application a description of its consultation with the department, with regard to potential impacts upon national security, including potential impacts on the land, sea, and airspace identified by the DoD and its impacted service components, for conducting operations and training, or for the research, development, testing, and evaluation of weapons, sensors, and tactics. If the information is provided after the application is filed, the applicant shall forward the information upon receipt.

The DoD has established a Military Aviation and Installation Assurance Siting Clearinghouse (Clearinghouse) to protect the Department's mission capabilities from incompatible energy development. The DoD conducts both formal and informal project reviews and encourages developers to request an informal review early in the process. The goal of the informal review process is to identify areas of potential impacts and refer proponents to the appropriate DoD stakeholders for further discussion before the project is submitted to the Federal Aviation Administration's (FAA) Obstruction Evaluation/Airport Airspace Analysis (OEAAA) process. For more information see: <https://www.dodclearinghouse.osd.mil/Project-Review/>

According to the California Military Energy Opportunity Compatibility Assessment Mapping Project (CaMEO CAMP) managed by the California Governor's Office of Planning and Research (OPR), the project site is within a Geographic Area of Concern and below a United States Air Force Military Training Route Corridor Area. Additionally, the project is within approximately four miles of land labeled as Fort Irwin Land Expansion associated with the nearby United States Army National Training Center at Fort Irwin (see also application Figure 2-5). For more information on CaMEO CAMP see: <https://opr.ca.gov/planning/land-use/military-affairs/>

**DR LAND-4.** To appropriately notify DoD through their federal channels, please undertake and document an informal DoD Clearinghouse review prior to submission of FAA Airspace Analysis. The DoD Siting Clearinghouse – Informal Review Request Form is available at: [https://www.dodclearinghouse.osd.mil/Portals/134/DOD\\_Siting\\_Clearinghouse\\_Informal\\_Request\\_Form\\_2023.pdf](https://www.dodclearinghouse.osd.mil/Portals/134/DOD_Siting_Clearinghouse_Informal_Request_Form_2023.pdf). In accordance with Public Resources Code, section 25519.5, file information received from DoD to the project docket upon receipt.

CEC Siting Regulations Appendix B (i)(3) requires the application to include a schedule for obtaining any permits that are outside of the CEC's authority, and the steps that the applicant must take to obtain such permits. In Appendix V, Table 2-1, the application states that a BLM ROW Grant authorization would be required for the project and would be issued concurrent with the Opt-In Application. However, the BESS component of the proposed project was not included as part of the BLM's ROD issued in 2016. Based on staff's experience with similar BLM projects within the DRECP planning area, the BLM likely has or will require the applicant to submit an amendment to the project Plan of Development (POD) per Item 7 of the federal SF-299 application (Application for Transportation, Utility Systems, Telecommunications and Facilities on Federal Lands and Property). A POD amendment would likely trigger subsequent environmental review under NEPA to cover the BESS component.

To ensure that staff's Land Use analysis of the project's conformity with federal plans, leases, and permits accurately addresses BLM's procedures, please provide the extent to which further analysis of the BESS component will be required by BLM prior to issuing the ROW Grant authorization for the proposed project.

**DR LAND-5.** Please provide the following information:

- a. Requirements that must be met by the applicant prior to BLM's issuance of a ROW Grant authorization (e.g., an amended POD and/or additional NEPA analysis to cover project components not addressed in the March 2016 BLM approval of the project as included in its ROD).
- b. A schedule for submitting any additional materials to the BLM that are required for the agency's issuance of a ROW Grant authorization for the project, and the anticipated date for receiving the BLM ROW Grant authorization.

## **PALEONTOLOGICAL RESOURCES**

Appendix B (g) (1) requires a discussion of direct, indirect, and cumulative impacts, as well as possible mitigation measures.

While discussion of impacts to paleontological resources and mitigation measures are included in Appendix H, Paleontological Resources Technical Report (TN 257932), these discussions need to be included in Section 3.7 Geology and Soils (TN 257923).

**DR PALEO-1.** Please include a discussion of impacts to, and mitigation measures for paleontological resources in Section 3.7.

**DR PALEO-2.** Since Section 3.7 includes the evaluation of paleontological resources, please include this in the title of the section.

Appendix B (i) (1) (A) requires that the application include a table that identifies the applicable laws, ordinances, regulations and standards (LORS). Table 2.2 in Appendix V

lists the regulatory setting sections for each technical section but does not list the individual LORS.

**DR PALEO-3.** Please list the individual applicable LORS in a table within Section 3.7.

Appendix B (i) (1) (B) requires that the application include a table of agencies that would issue permits outside CEC authority or enforce LORS, and Appendix B (i) (2) requires the contact information for any such agencies. Appendix B (i) (2) requires the inclusion of a schedule to obtain permits outside CEC authority.

While Table 2.1 in Appendix V lists the permits the applicant considers to be necessary for the project, this table does not indicate if any permits would be required for paleontological resources. Include a discussion in Subsection 3.7.2 of what, if any, permits are required for paleontological resources. In addition, include contact information for any state or local agencies that would be responsible for enforcing LORS related to paleontological resources.

**DR PALEO-4.** Discuss in Subsection 3.7.2 whether permits are required for paleontological resources, and if so, describe what steps have been taken and the timing of permits. If permits would not be applicable to paleontological resources, include a statement to that effect. Provide any related agency enforcement contact information.

## **PROJECT DESCRIPTION**

Chapter 2 Project Description (TN 257912), Subsection 2.4 describes the project parking areas to be located adjacent to project buildings and not expected to exceed approximately 0.33 acre, or 13,200 square feet, but does not describe the surface of the parking areas.

**DR PD-1.** Describe the proposed surface of the parking areas and include a discussion of any grading or other ground disturbance proposed.

Appendix B (b) (2) (B) requires a full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction. The application did not include a photographic reproduction showing a representative above ground section of the transmission line route prior to construction or a photographic simulation after construction.

**DR PD-2.** Please provide a full-page color photographic reproduction depicting a representative above ground section of the transmission line route prior to construction and a full-page color photographic simulation of that section of the transmission line route after construction.

Appendix B (b) (2) (C) requires a detailed description of the design, construction, and operation of any electric transmission facilities, such as power lines, substations, switchyards, or other transmission equipment, which will be constructed or modified to transmit electrical power from the proposed power plant to the load centers to be served by the facility. Such description shall include the width of rights-of-way and the physical and electrical characteristics of electrical transmission facilities such as towers, conductors, and insulators. There is very limited information about the 500 kilovolt (kV) generation tie line (gen-tie) and no information about the design, right-of-way width and physical and electrical characteristics of the gen-tie has been provided.

**DR PD-3.** Provide a description of the gen-tie that includes the design, right-of-way width and physical and electrical characteristics of the gen-tie. Include figures that show these details, as appropriate.

## **PUBLIC HEALTH**

The application did not include the public health section and information requirements. CCR, title 20 § 1704, (a) (3) include: (A) descriptions of key assumptions, methodologies, and computational methods used in the document; (B) summaries of major studies or research efforts relied upon, including ongoing research with expected completion dates; and (C) a list of referenced literature, with brief discussions of each source's relevance. The staff needs a separate section of public health that meets the above requirements.

**DR PH-1.** Please provide a separate public health section that includes descriptions of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.

**DR PH-2.** Please provide descriptions, including methodologies and findings, of all major studies or research efforts undertaken and relied upon to provide information for the document; and a description of ongoing research of significance to the project (including expected completion dates) in the public health section requested in **DR PH-1**.

**DR PH-3.** Please provide a list of all literature relied upon or referenced in the documents, along with brief discussions of the relevance of each such reference in the public health section requested in **DR PH-1**.

The application does not include a map indicating the locations of the sensitive receptors. Chapter 2 states that the project is bounded directly to BLM lands, including the Razor Off-Highway Vehicle (OHV) Recreation Area, a residence is roughly 260 feet southwest of the proposed boundary, and there are no other sensitive receptors within 1,500 feet (0.28 miles) of the project site, and actual construction occurs more than 3,500 feet (0.66 miles) from this standalone home. Staff requires further clarification on the locations of the Maximally Exposed

Individual Resident (MEIR) and Maximally Exposed Individual Worker (MEIW) receptors, as well as the impacts at these locations.

**DR PH-4.** Please provide a map showing sensitive receptor locations for MEIR, MEIW, including the distance from the project boundary.

**DR PH-5.** Please provide available health studies through the local public health department concerning the potentially affected population(s) within a six-mile radius of the proposed power plant site related to respiratory illnesses, cancers or related diseases.

**DR PH-6.** Please provide justification regarding whether a cumulative air quality impact modeling analysis is needed with updated modeling results. If yes, please submit a modeling protocol for assessing the cumulative air quality impacts of the project during its standard operational phase in combination with other stationary emissions sources within a 6-mile radius that have received construction permits but are not yet operational or are in the permitting process.

In Appendix C, the applicant uses the HARP model to evaluate cancer risks and the chronic hazard index (HI) for sensitive receptors exposed to diesel particulate matter (DPM) emissions during the construction phase. Staff needs the HARP analysis at sensitive receptors for additional requirements.

**DR PH-7.** Please provide a Health Risk Assessment of the project during both construction and operation to demonstrate the project impacts to sensitive receptors. The Health Risk Assessment should show risks of cancer, non-cancer chronic exposure, and noncancer acute exposure, whereby the chronic exposure is one that is greater than twelve (12) percent of a lifetime of seventy (70) years.

**DR PH-8.** Please provide a listing of the input data and output results, in both electronic and print formats, used to prepare the HARP health risk assessment.

For the CEC's jurisdiction and in lieu authority set forth in Public Resources Code section Appendix B (i) (1) (B), any state or local air quality permit that would have been issued from the Mojave Desert Air Quality Management District (District) will be incorporated into the CEC's certification. To assist the District in reviewing the project, the applicant should submit the necessary information to the District. To ensure the District's requirements are contained in the CEC's EIR and certification, staff needs copies of all correspondence between the applicant and the District in a timely manner to stay up to date on any issues that arise prior to completion of the environmental document.

**DR PH-9.** Please provide tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each.



**DR PH-10.** Please provide tables that identify each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies that would have permit approval or enforcement authority, but for the exclusive authority of the CEC to certify sites and related facilities.

## **SOCIOECONOMICS**

Appendix B (g) (7) (A) (i) requires a list of the applicable local agencies with taxing powers and their most recent and projected revenues.

**DR SOCIO-1.** Please provide data to address the most recent and projected revenues of each local agency with taxing power and their most recent and projected revenues.

Appendix B (g) (7) (A) (iv) requires providing the availability of skilled workers by occupation that would be required for both construction and operation of the project.

**DR SOCIO-2.** Please provide a table showing the number of skilled workers by occupation/trade required for construction and operation of the project and their availability within the County. This table can be combined with the table requested in **DR SOCIO-5.**

Appendix B (g) (7) (A) (v) requires information about the availability of temporary and permanent housing and current vacancy rates. Table 3.14-1 (p. 3.14-2) in Section 3.14 Population and Housing provides the estimated 2023 housing stock of the nearby communities and the vacancy rate, which is also described in Section 3.14.2.3. However, no information is provided about temporary housing.

**DR SOCIO-3.** Page 3 of Appendix P says that “The economy [of Baker] is based primarily on tourism.” If that is the case, there are likely temporary housing such as motels and RV parks in the project vicinity. Please provide information as to the number of rooms that are available in temporary housing such as motels and spaces in trailer/RV parks and their average occupancy rates.

Appendix B (g) (7) (A) (vi) requires information for each school district shall include current enrollment and yearly expected enrollment by grade level groupings, excluding project-related changes for the duration of the project schedule. Yearly expected enrollment by grade level is not provided.

**DR SOCIO-4.** Table A-5, in Appendix P, provides school enrollment for one, unspecified year. Please provide enrollment by grade level for the most recent year available and expected enrollment for the duration of the project schedule.

Appendix B (g) (7) (B) (i) requires an estimate of the number of workers to be employed each month by occupation during construction, and for operations, an

estimate of the number of permanent operations workers during a year of the project. For construction, Appendix P uses 200 full-time equivalent (FTE) workers during an 18-month construction period while Section 3.14 estimates an average of 200 workers with 300 during peak construction. For operations, Appendix P states 25 to 45 workers, with average of 32, while Section 3.14 states 25 to 40 personnel. Neither Section 3-14, nor Appendix P have number of construction and operation workers broken down by month or by specific trades.

**DR SOCIO-5.** Please provide a table showing breakdown of the construction workers by occupation/trade for each month throughout the project's construction period and during operations.

Appendix B (g) (7) (B) (ix) requires an estimate of the capital cost (plant and equipment) of the project. Appendix P is based on a project of 440 megawatts (MW) (which may have been the case when the project included the North Array). The current project description in Chapter 2.0 Project Description states the project is 300 MW. Hence, Appendix P likely overstates the direct, indirect, and induced impacts.

**DR SOCIO-6.** Please revise Appendix P and recalculate the capital cost (plant and equipment) of the project. Please also revise any other tables and analysis that is affected by that change.

Appendix B (g) (7) (B) (x) requires an estimate of sales taxes generated during construction and separately during an operational year of the project. The amounts in Appendix P may be overstated since Appendix P is for a 440-MW project and the proposed project is only 300 MWs. Section 3.1.5 of Appendix P (p. 17) says "The Project will not generate direct sales tax during operations." However, Section 4.2.2 of Appendix P (p. 21) states: "over 30 years of operations, the Project will generate \$565,620 in sales tax for San Bernardino County General Fund, as shown in Table 9." Also, Table 3.19-4 (pp 3.19-17 & 18) provides a list of anticipated waste quantities. If there are waste products, there are likely purchases. Hence, there must be sales taxes during operations.

**DR SOCIO-7.** Please revise your prior work and make an estimate of sales taxes generated during construction and separately during an operational year of the 300 MW project.

Appendix B (g) (7) (B) (xii) requires the applicant to provide expected direct, indirect, and induced income and employment effects due to construction and operation of the project.

**DR SOCIO-8.** Please revise your prior work and provide the expected direct, indirect, and induced income and employment effects due to construction and operation of the 300 MW project.

Appendix B (g) (7) (B) (xiii) requires a discussion of impacts to environmental justice (EJ) populations by technical areas and whether any impacts would disproportionately affect the environmental justice populations. Appendix P, Section 2.5 describes the demographics of the area surrounding the project using CalEnviroScreen.

**DR SOCIO-9.** Please provide a discussion of potential Environmental Justice impacts by technical area within a six-mile radius of the project site and make a determination whether any impacts would disproportionately affect the environmental justice populations as required by Appendix B (g) (7) (B) (xiii). It is insufficient to make a conclusory statement such as "The Project would not cause the percentiles of any of these components [of the CalEnviroScreen tool] to increase to any significant degree" (p. 15) without analysis to support that conclusion.

Appendix B (i) (1) (A) requires the preparation of tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.

**DR SOCIO-10.** Please provide a table(s) with references to where the applicability and conformance with LORS, plans, leases and permits are discussed.

## **SOILS**

Chapter 2, Section 2.5.3, identified that 449,900 cubic yards of net cut will be transported to the nearest Class II or Class III landfill with the capacity to receive it. Appendix B (g) (15) (A) (iii) requires the application identify the location of proposed disposal site for cut (excess) soil.

**DR SOILS-1.** Identify the location(s) of proposed disposal facilities willing to accept excess soil generated during project construction.

**DR SOILS-2.** Provide copies of any preliminary correspondence along with contemporaneous meeting notes regarding discussions with soil disposal facilities and include the name of officials contacted.

Chapter 2, Subsection 2.1 states the project is located on approximately 2,670 acres of land administered by the U.S. Department of Interior, BLM. Appendix I, Phase I Environmental Site Assessment (ESA), Property Description indicates the assessment presents the results for the construction of a solar energy facility on 1,490 acres. Based on this information, it appears the ESA provided did not consider the entire project area.

**DR SOILS-3.** Provide a revised ESA which considers the entire project site, as described in the application.

## TRAFFIC AND TRANSPORTATION

Appendix B (g) (5) (A) requires a regional transportation setting, on topographic maps (scale of 1:250,000), identifying the project location and major transportation facilities.

**DR TRANS-1.** There is reference in Appendix M (p. 17) to an access road to the Opah Ditch pit mine. Please provide a map that shows the location and extent of the road to be used. Please also provide a description of its nature (surface, width, etc.) and any planned improvements associated with the project.

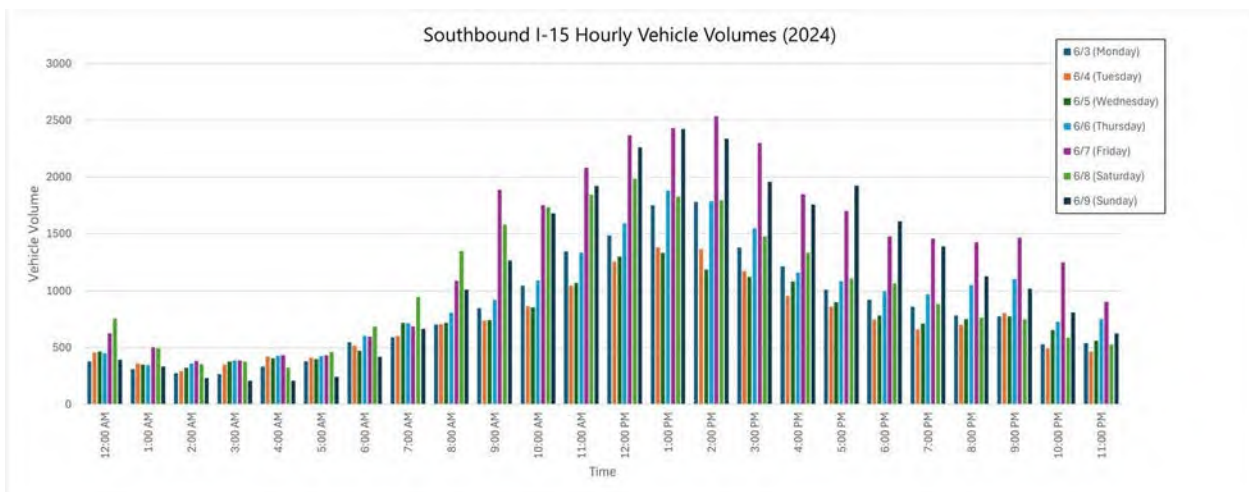
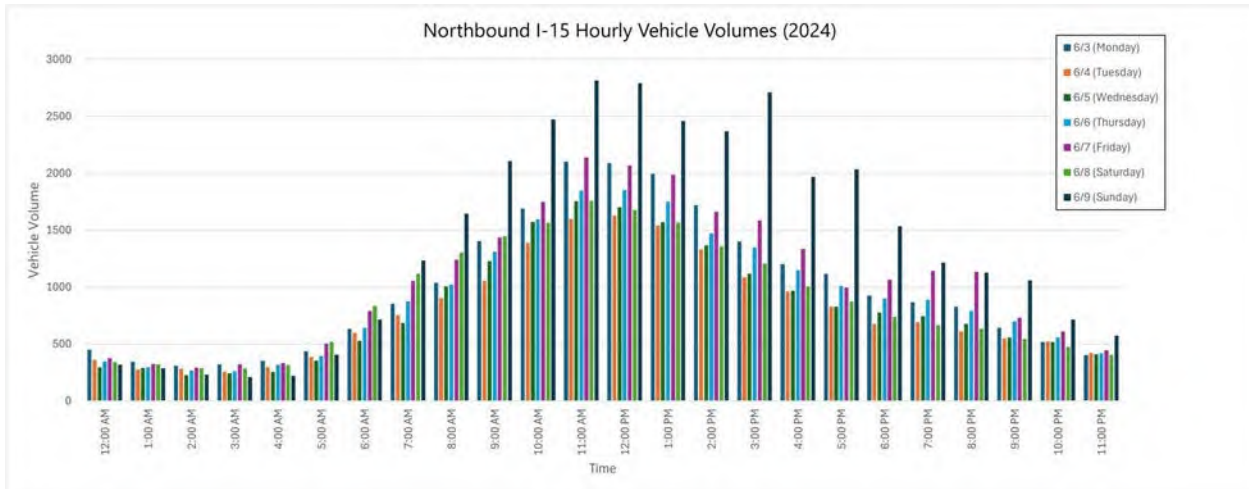
Appendix B (g) (5) (C) requires an evaluation of the project's potential impacts related to vehicle miles traveled.

**DR TRANS-2.** The vehicle miles traveled (VMT) discussion dismisses construction-related VMT. Given the site would experience over 800 trips per day during construction, including 200 heavy-vehicle trips, and many of those trips would be long-distance (due to the remote location), what is the basis for concluding it is not relevant? The question of relevance also relates to the duration of the construction phase, which isn't identified in the transportation section. Please identify CEQA guidelines that support any conclusion regarding the relevance of construction-related VMT.

Appendix B (g) (5) (D) (ii) requires current daily average and peak traffic counts.

**DR TRANS-3.** The section of Interstate 15 (I-15) near the project site is primarily a long-distance and recreational route, not a commute route. Much of this flow is from Southern California to Las Vegas on weekends. As such, the peak times are not during the typical weekday morning and evening commute. This is illustrated in the following graphics, which show the traffic volumes over a week in June 2024. The peak hour in the southbound direction was Friday at 2:00 p.m., and the peak hour in the northbound direction was Sunday at 11:00 a.m. For all days, the peaks were highest during the middle of the day, rather than the times analyzed in the application document. CEQA requires a disclosure of impacts and is not specific as to what time frame; therefore, the analysis should cover the local peak periods.

Please provide information regarding the traffic volumes (existing and with construction traffic) during the local peak periods. If construction activities would be prohibited during these periods, please indicate as such.



Sources: Caltrans Performance Measurement System (PeMS); Fehr & Peers.

Appendix B (g) (5) (D) (iii) requires current and projected levels of service before project development, during construction, and during project operation.

**DR TRANS-4.** From the information collected for **DR TRANS-3**, please provide the level of service (LOS) values for both existing conditions and with the project (during the construction phase).

Appendix B (g) (5) (D) (v) requires estimated percentage of current traffic flows for passenger vehicles and trucks.

**DR TRANS-5.** Please provide truck flows (percent of total traffic) during the peak periods identified in **DR TRANS-3**.

Appendix B (g) (5) (D) (vi) requires an identification of any road features affecting public safety.

**DR TRANS-6.** Given the speed of traffic flows on this section of I-15 (signed at 70 miles per hour, with actual being higher), how would construction trucks safely enter and exit from the Rasor Interchange during times of heavy volume on I-15? Please indicate whether Caltrans has been consulted on this matter and their response.

Appendix B (g) (5) (E) requires an assessment of the construction and operation impacts of the proposed project on the transportation facilities identified in (g)(5)(D). Also include anticipated project specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in (g)(5)(D).

**DR TRANS-7.** As Rasor Road is unimproved (dirt) beyond the interchange, please indicate how dust from construction vehicles would be controlled so as not to impair visibility on the nearby section of I-15.

**DR TRANS-8.** As the solar field would be immediately adjacent to I-15, please provide an analysis of the potential impacts of glare (reflection from the panels) on motorists of I-15. If there is a potential impact, identify how it would be mitigated.

Appendix B (g) (5) (E) (i) requires estimated one-way trip lengths for workers, deliveries, and truck haul trips generated by the construction of the project.

**DR TRANS-9.** Please estimate the direction (percentage of east vs west) that construction trucks would use for their activities and the average length of their haul. Similar for workers, please identify the likely sources of workers (geographically) and their corresponding trip length.

Appendix B (g) (5) (E) (ii) requires description of public roadways and intersections temporarily or permanently altered by construction and operation including the duration of activities.

**DR TRANS-10.** On page 3.17-24 in Section 3.17 Transportation, there is a reference to eliminating Rasor Road access to the Rasor OHV during construction. Would there be an alternative route for access to OHV during this period or would it be inaccessible? What is the expected duration of the closure?

Appendix B (i) (1) (A) requires tables that identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed.

**DR TRANS-11.** Please provide a table that summarizes the applicable transportation-related laws, ordinances, regulations, and standards, and where

project conformance is identified in Section 3.17. If project conformance is not included in this section, please provide this assessment.

Appendix B (i) (3) requires a schedule indicating when permits outside the authority of the Commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.

**DR TRANS-12.** Please indicate the schedule and steps taken related to permit or approval for all transportation-related entities with permit or approval authority, including local and state agencies whose jurisdiction may be subsumed by CEC certification of the project.

### **TRANSMISSION SYSTEM SAFETY AND NUISANCE**

Cal. Code Regs. Tit. 20 § 1704, (a) (3) (A) requires a description of all significant assumptions, methodologies, and computational methods used in arriving at conclusions in the document.

**DR TSSN-1.** Please describe the methodology which was selected to calculate electro magnetic field (EMF) values beneath the gen-tie line.

Appendix B (g) (1) requires a discussion of the existing site conditions, the expected direct, indirect, and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.

**DR TSSN-2.** Please provide an overview of the EMF, Electric field, and Corona effects of the project. As well as EMF effects underneath the gen tie line right away, substation and switch yard area. If there are any adverse consequences caused by the project, then discuss mitigation measures.

Appendix B (g) (18) (B) requires an estimate of the existing EMF from the facilities listed in (A) above and the future EMF that would be created by the proposed project, calculated at the property boundary of the site and at the edge of the rights of way for any transmission line. Also required is an estimate of the radio and television interference that could result from the project.

**DR TSSN-3.** Please provide an accurate EMF, Electric Field (EF) values, and graphs for the 500kV Gen-tie line and provide 500kV gen-tie line required number of structures, structure height, conductor type, current carrying capacity, and grounding details.

Appendix B (g) (18) (C) requires the specific measures proposed to mitigate identified impacts, including a description of measures proposed to eliminate or reduce radio and television interference, and all measures taken to reduce EMF levels.

**DR TSSN-4.** Please discuss mitigation measures that would be utilized to reduce EMF, EF, radio and television interference effects in the process of project design, construction, and operation phase, under California Public Utilities Code (CPUC) General Order (GO) 95 and 128, such as line clearances, underground duct bank designs and proper right away, etc.

Appendix B (i) (1) (A) requires tables identifying laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project, and a discussion of the applicability of, and conformance with each.

**DR TSSN-5** Please provide a table that includes laws, regulations, ordinances, standards regarding EMF and EF, which are adopted by the local, regional, state, and federal agencies, including a discussion of applicability and project conformance.

## **TRANSMISSION SYSTEM DESIGN**

For the identification of impacts on the transmission system and the indirect or downstream transmission impacts, staff relies on the Los Angeles Department of Water and Power (LADWP) Interconnection Studies to ensure the interconnecting to the grid meets the LADWP reliability standards. The studies analyze the effect of the proposed project on the ability of the transmission network to meet reliability standards. When the studies determine that the project will cause a violation of reliability standards, the potential mitigation or upgrades required to bring the system into compliance are identified. The mitigation measures often include the construction of downstream transmission facilities. CEQA requires the analysis of any downstream facilities for potential indirect impacts of the proposed project. Without a complete LADWP Interconnection Study, staff is not able to fulfill the CEQA requirement to identify the indirect effects of the proposed project.

Complete descriptions of the project transmission and interconnection facilities are also required to determine whether the project, as proposed, would comply with CPUC GO 95, 128 and 131-D construction standards. Therefore, please provide following information:

**DR TSD-1.** Please provide one-line diagrams for the project substation. Show all equipment ratings including the bay arrangement of the circuit breaker, disconnection switches, buses, transformers, and other equipment that would be required for the project interconnection to the proposed switchyard.

**DR TSD-2.** Please provide one-line diagrams for the proposed switchyard. Show all equipment ratings including bay arrangement of the breakers, disconnect switches, buses, and other equipment. Show the interconnection to the LADWP 500kV transmission system and the project substation.



**DR TSD-3.** Please provide the gen-tie structure configuration. Indicate the number of structures required to support the overhead generator tie-line and the 500 kV loop-in transmission lines of the LADWP.

**DR TSD-4.** Please provide the gen-tie conductor type, size, and current carrying capacity.

**DR TSD-5.** Please provide the most recent Generator Interconnection LADWP Reassessment Study Report if it is available.

**DR TSD-6.** Please discuss the CPUC GO 98 and 128 standards in reference to the project's overhead and underground construction facilities, such as grounding, duct banks, derated ampacity, overhead conductor clearances, and soil resistivity analysis.

**DR TSD-7.** The applicant has not discussed any TSE downstream impacts caused by the project in the Opt-in application. If any transmission upgrades are necessary, please provide information to support a CEQA analysis for all downstream upgrades needed for the Soda Mountain Solar Project.

## **VISUAL RESOURCES**

Appendix B(g)(1) requires a discussion of the expected impacts of the project. However, the six selected key observation points (KOPs) and associated simulations are inadequate to support the impact analysis, as described below, and must be revised/augmented.

The simulations for KOPs 3, 8, and 11 provide distant views of the project that understate the color contrast (and thus, noticeability) that would be anticipated from the array fields. Instead of a darker gray/blue-black color (reasonable worst-case depending on time of day, angle of view, and reflectance), the array fields present a palette of atypical, earth-tone, light- to dark-brown colors presenting minimal color contrast with the surrounding landscape. Also, the distant array fields in KOP 10 present an atypical greenish to brown color palette rather than the darker gray/blue-black color referenced above or a lighter, reflected bluish color that may be warranted depending on time of day when viewing to the south from this location.

KOPs 4 and 6 provide more proximal views of the array fields from I-15. However, in both cases the simulations present essentially no structural presence of the solar panels beyond the fence, possibly suggesting that the seven-foot-high chain-link fence would be effective in screening the up to 12-foot-high solar panels beyond the fence line (the one foot of barbed wire would not be a factor). This would not be expected, however, and these KOP simulations do not illustrate the project's visual dominance that would most likely be apparent in views from I-15.

KOP 6 is also problematic in that the frame of view is centered on the more distant (almost one mile away) substation rather than the adjacent array field, which is less than 500 feet away but out of the frame of view (to the left). The result is that KOP 6 serves no particular purpose except to, again, suggest that project visibility from I-15 would be limited, which would likely not be the case. Therefore, this KOP should either be relocated, or the frame of view reoriented to capture the visible prominence of the adjacent array field. Additionally, the location of the simulated substation appears to be inconsistent with the substation location presented in the KMZ file entitled "Soda Mountain 30% Design Project Components." The simulated substation appears to be approximately 700 feet to the east (farther away from I-15) compared to the location in the KMZ. One suggestion is to relocate KOP 6 slightly farther to the northeast to an approximate location of: Lat: 35.178497°, Long: -116.170580°. A view to the south-southeast (heading of 170°) from this location would more easily capture the nearby solar arrays that southbound travelers on I-15 would first encounter.

Furthermore, the discussion of Impact AES-1 refers to an analysis from KOP 13, which does not exist. Similarly, the discussions of Impact AES-1 and AES-4 refer to KOP 5, which is not one of the KOPs selected for analysis.

Finally, the six KOPs selected for analysis do not capture key project components, which contribute to the overall structural complexity and industrial character of the project including: 1) the substation, which at its closest point, would be slightly less than 700 feet from I-15; 2) the BESS yards; 3) the gen-tie span of I-15; 4) the gen-tie line as it diverges from I-15 to cross the alluvial valley northwest of I-15 and connects with the proposed switchyard; and 5) the switchyard, which is approximately 0.9 mile northwest of I-15.

**DR VIS-1.** Revise/augment the KOPs and associated simulations as follows.

- Revise the array field color tones for KOPs 3, 8, 10, and 11 as appropriate.
- Revise or relocate KOPs 4 and 6 and their simulations to achieve a better representation of the visual dominance that the project arrays would present when viewed from I-15. Both KOPs should be relocated closer to the arrays to more effectively capture the structural character of the project and the resulting landscape changes. A suggested alternative location for KOP 6 is provided above. That same location would also be an appropriate KOP to capture the switchyard and gen-tie line (viewing to the west with a heading of 277°) as visible to southbound travelers on I-15.
- For the KOP 6 simulation, clarify or revise the substation location.
- For the references to KOPs 5 and 13, please clarify or revise the text as appropriate.
- Establish two new KOPs at the same new location on northbound I-15: one viewing to the east and one viewing to the northwest. An approximate location (to be verified in the field and adjusted if necessary) would be: Lat: 35.163852°,

Long: -116.183510°. The frame of view to the east should be able to capture the substation, the BESS yards, a portion of the gen-tie line connecting to the substation and then converging on I-15, a portion of the array field immediately adjacent to the KOP, a portion of the drainage canal, and portions of the background array fields. The frame of view to the northwest should capture the majority of the gen-tie line diverging from the span of I-15 and then connecting to the switchyard, and the switchyard, a view that would be experienced by northbound travelers on I-15.

- Revise/update analyses and text based on the above requests.

Appendix B (g) (6) (A) requires a description of the existing landscape (built or natural) where the proposed project is to be sited and the vicinity. It also requires these descriptions along the proposed routes for any aboveground project-related linear facilities. This discussion is to include any distinguishing natural features, objects, or geologic distinguishing characteristics that are recognized for their aesthetic value. Section 3.1 Aesthetics (TN 257910), Subsection 3.1.2.2 is lacking such specific site details.

**DR VIS-2.** Expand the discussion of Section 3.1.2.2 to address any distinguishing natural features, objects, or geologic distinguishing characteristics of the project site that are recognized for their aesthetic value. If no such features exist on the site, state so.

Appendix B(g)(6)(D)(i) requires scaled elevation drawings of project buildings, structures, and major equipment. Also required is a table listing their dimensions (height, length, width, diameter). Although the visual simulations presented in Appendix D from Appendix B of the Visual Resources Technical Report provide inset structure diagrams of solar panels, and some dimensional information is provided in Appendix B Visual Resources Technical Report, Subsection 2.2 Project Description, pp. 2 to 5, this information is insufficient.

**DR VIS-3.** Provide complete elevation drawings of project buildings, structures, and major equipment including solar panels and arrays, inverters, BESS components and facilities, substation, gen-tie structures, switchyard, ancillary buildings (e.g., O&M and warehouse), fencing, and any other above-ground structures. Also include a table listing all structure dimensions (e.g., height, length, width, and diameter).

Appendix B(g)(6)(D)(ii) requires that a table and description of the exterior surface treatments and finishes (e.g., colors, flat and/or textured finishes) for the buildings, structures, major equipment, and structural materials be provided. Although Subsection 3.1.3.2, APM AES-1: Siting and Design, pp. 3.1-23 to 3.1-24 presents the applicant's commitment to provide such information at a later date following agency consultation, such information is required for this application to be deemed complete.

**DR VIS-4.** Provide a table and description of the exterior surface treatments and finishes (e.g., colors, flat and/or textured finishes) for all of the project’s proposed buildings, structures, major equipment, and structural materials.

Appendix B(g)(6)(D)(iv) requires that a project-specific conceptual landscape design plan that conforms with the city municipal code or county government code be submitted. While a Preliminary Landscape Concept Plan has been submitted in Appendix B Visual Resources Technical Report – Appendix B, which states in the General Descriptions/Design Intent that “All landscape improvements shall be designed in accordance with county of [San] Bernardino landscape standards,” this step has apparently not been taken. Therefore, there is no certainty that the submitted landscape concept plan is viable with respect to County approval, which also calls into question the validity of the visual simulations that show the intended landscaping. Therefore, County review and approval of the Landscape Concept Plan is required for this application to be deemed complete.

**DR VIS-5.** Provide a project-specific conceptual landscape design plan that has been reviewed and approved by the County of San Bernardino. The approved Plan shall be the basis for landscaping shown in project visual simulations.

Appendix B(g)(6)(D)(v) requires that a project-specific conceptual outdoor lighting control and management plan (lighting plan) be provided that explains the control of reflectance from exterior surfaces off site that conforms with the city municipal code or county government code. A Conceptual Outdoor Lighting Plan has been submitted as Exhibit 1 in Appendix B Visual Resources Technical Report - Appendix A Outdoor Lighting Impact Assessment Report. However, a discussion of reflectance (of night lighting) from exterior surfaces has not been provided. Additionally, although a review of Outdoor Lighting Regulations and Reference Standards is provided in the Outdoor Lighting Impact Assessment Report, there is no evidence that the lighting plan has been reviewed by the County of San Bernardino and has been determined to conform with the County government code.

**DR VIS-6.** Provide a project-specific conceptual outdoor lighting control and management plan (lighting plan) that explains the control of reflectance from exterior surfaces, and provide evidence that the lighting plan has been found to conform with the government code of San Bernardino County.

Appendix B (g) (6) (D) (v) a. requires that a list of the project-specific luminaires be provided including the luminaire design (e.g., full-cutoff, semi-cutoff, non-cutoff) and whether the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Also required are the project-specific luminaires’ locations on a diagram or elevation. Although the Outdoor Lighting Impact Assessment Report describes the type of luminaires to be used (25ft pole top for outdoor access/security pathways and 10ft wallpacks for access/security pathways to buildings [Substation, Switchyard, O&M,

Maintenance, and Warehouse]) and provides some technical information regarding the luminaires, the specific luminaire fixtures have not been identified. Additionally, rather than indicate whether the proposed luminaires have the International Dark-Sky Association Fixture Seal of Approval (as required), the Assessment Report states that the fixtures will be dark sky compliant but that the IDSA Fixture Seal of Approval is not required for this project. Also, luminaire type has been indicated only generally on the Conceptual Outdoor Lighting Plan, but specific luminaire fixtures and specific locations have not been identified.

**DR VIS-7.** Provide a list of the project-specific luminaires; identify the design (e.g., full-cutoff, semi-cutoff, non-cutoff); and indicate if the luminaires have the International Dark-Sky Association Fixture Seal of Approval to the extent feasible consistent with safety and security considerations. Show the project-specific luminaires' locations on a diagram or elevation.

Appendix B (g) (6) (D) (v) b. requires that a description of project surface reflectance be provided including the intensity of the specular reflectance from the exterior surface of a project's large buildings, structures, and major equipment off site to the surrounding area (e.g., the light reflected from the shiny surface). The reflectance of the object—how bright it shines—depends on the intensity of the light striking it and the materials from which it is made (e.g., glass, reinforced concrete, structural steel). This information has not been provided either in the Outdoor Lighting Impact Assessment Report or the ForgeSolar Glare Analysis Report.

**DR VIS-8.** As specified in the Siting Regulations, describe project reflectance and include the intensity of the specular reflectance from the exterior surface of the project's large buildings, structures, and major equipment off site to the surrounding area (e.g., the light reflected from the shiny surface).

Appendix B (i) (1) (A) requires a tabular or matrix presentation of the laws; regulations; ordinances; standards; adopted local, regional, state, and federal land use plans, leases, and permits applicable to the proposed project. Also required is a discussion of the applicability of, and conformance with, each. The table or matrix shall explicitly reference pages in the application wherein conformance with each law or standard during both construction and operation of the facility is discussed.

Although Subsection 3.1.1 provides a narrative discussion of applicable regulatory requirements, the data is not provided in a tabular format, and a complete discussion of the applicability of, and conformance with, each applicable law, regulation, ordinance, standard, adopted land use plan, lease, and permit is not presented.

**DR VIS-9.** As specified in the above Siting Regulation, provide a table or matrix of the laws; regulations; ordinances; standards; adopted local, regional, state, and federal land use plans, leases, and permits applicable to the project. Also provide a discussion of the applicability of, and conformance with, each. The table or matrix

shall also explicitly reference pages in the application wherein conformance with each law or standard during both construction and operation of the facility is discussed.

Appendix B (i) (1) (B) requires the identification of each agency with jurisdiction to issue applicable permits, leases, and approvals or to enforce identified laws, regulations, standards and adopted local, regional, state, and federal land use plans, and to identify agencies that would have permit approval or enforcement authority, but for the exclusive authority of the commission, to certify sites and related facilities.

Appendix V, Section 2.0, Table 2-1, p. 2-6 does not identify the agency with the jurisdiction to grant approval of the project-specific Conceptual Outdoor Lighting Control and Management Plan nor the project-specific Conceptual Landscape Plan.

**DR VIS-10.** Identify each agency with jurisdiction to issue applicable permits and/or approvals, but for the exclusive authority of the CEC, pertaining to:

- a. Project-specific Conceptual Outdoor Lighting Control and Management Plan (lighting plan).
- b. Project-specific Conceptual Landscape Plan.

Appendix B (i) (2) requires contact information of an official who was contacted within each agency. Appendix V, Chapter 2.0, Table 2-1, p. 2-6 does not identify any agency or official that was contacted with regards to the preparation and review of the project-specific Conceptual Outdoor Lighting Control and Management Plan or the Conceptual Landscape Plan.

**DR VIS-11.** Please provide the name, title, phone number, address (required), and email address (if known), of each official who was contacted within each agency, and provide the name of the official who will serve as a contact person for CEC staff.

Appendix B (i) (3) requires a schedule indicating when permits outside the authority of the CEC will be obtained and the steps the applicant has taken or plans to take to obtain such permits. While Appendix V, Section 2.0, Table 2-1, p. 2-6 includes a general schedule for obtaining the various permits identified in the table, no schedule for review/approval of the project-specific Conceptual Outdoor Lighting Control and Management Plan or the Conceptual Landscape Plan is provided.

**DR VIS-12.** Please provide the schedule for the agency review/approval of the project-specific Conceptual Outdoor Lighting Control and Management Plan and the Conceptual Landscape Plan.

## **WASTE MANAGEMENT**

Appendix B (i) (1) (A) requires that the application includes a table that identifies the applicable laws, ordinances, regulations and standards (LORS). Table 2.2 of Appendix V

lists the regulatory setting sections for each technical section but does not list the individual LORS.

**WASTE-1.** Please list the individual applicable LORS in a table within Appendix R Waste Management.

## **WATER RESOURCES**

Significant assumptions, methodologies, and computational methods. The application provides incomplete specifics on the assumptions, methodologies and computational methods used in arriving at water resource-related conclusions.

**DR WATER-1.** Provide descriptions in Section 3.10 Hydrology and Water Quality (TN 257909) of all significant assumptions, methodologies, and computational methods used, including those specifically related to calculations or other computations requested within this section.

Waste Discharge -Surface Impoundment. The application states the proposed brine ponds would be designated as Class II surface impoundments and the applicant is seeking a Title 27 Discharge Permit from the Regional Water Quality Control Board.

**DR WATER-2.** Provide a complete Form 200, Report of Waste Discharge (ROWD), for the proposed discharge, which should include a complete characterization of the proposed discharge. A complete characterization includes, but is not limited to, design and actual flows, a list of constituents and the concentration of each constituent, a list of other appropriate waste discharge characteristics, a description and schematic drawing of all treatment processes, a description of any Best Management Practices (BMPs) used, and a description of disposal methods. Also include a site map showing the location of the facility and limit maps to a scale of 1:24,000 (7.5' USGS Quadrangle) or a street map, if appropriate.

Onsite Wastewater Treatment System (OWTS). The application states a septic system would be constructed adjacent to the project buildings to support operation and maintenance employees' sanitary needs. The system is to include a septic tank and adjacent leaching area. To evaluate the environmental effects of the proposed project, a description of the specific facilities to be provided is required.

**DR WATER-3.** Please provide the following information:

- a. Average daily, maximum daily, and annual wastewater discharge for the operational phase of the project, as it relates to domestic wastewater treatment and disposal (Appendix B (g) (14) (C) (iii)).
- b. A discussion of applicability and compliance with Local Area Management Plan (LAMP) for OWTS, consideration of site exceptions which may require individual

discharge requirements, or a waiver of individual waste discharge requirements issued by the Regional Water Quality Control Board (RWQCB), along with consideration of all relevant codes and ordinances (Appendix B (i) (1) (A)).

- c. System drawings (plot and grading plans) and calculations to demonstrate the site will support onsite wastewater disposal including a soils report detailing how site conditions are conducive to onsite wastewater disposal and that the OWTS will not impact groundwater or surface water. Include plans demonstrating that the OWTS is sized appropriately, and sufficient area is available to install a septic system meeting proper setbacks including 100 percent expansion area.
- d. If a percolation report has not already been completed, submit to the CEC information in compliance with the (LAMP) for notification, testing, and evaluation. A completed percolation report must specify the design percolation rate in minutes per inch (MPI), soil profile, gravel correction factor, and slope analysis (Appendix B (g) (14) (C) (ii), (iv)).

Stormwater Discharge – Industrial Activities. Federal regulations for stormwater discharges require specific categories of facilities that discharge stormwater associated with industrial activity to obtain National Pollutant Discharge Elimination System (NPDES) permits. Due to the large number of facilities requiring permit coverage, the State Water Resources Control Board adopted Order 2014-0057-DWQ, General Permit for Storm Water Discharges Associated with Industrial Activities (Industrial General Permit), as an available option. The Industrial General Permit regulates discharges of stormwater associated with certain industrial activities, excluding construction activities. Attachment A of the permit lists covered facilities based on Standard Industrial Classification (SIC) Code. The RWQCB has discretion to adopt individual permits for any discharge, based on threat to water quality or other relevant factors.

**DR WATER-4.** Specify the applicable SIC code for your proposed project and provide analysis on NPDES permit applicability. Document any coordination with the RWQCB regarding NPDES storm water permitting requirements (Appendix B (i) (1) (A)).

**DR WATER-5.** Provide a Drainage, Erosion, and Sedimentation Control Plan (DESCP) which describes how stormwater will be managed and identifies monitoring and maintenance activities during project operation.

**DR WATER-6.** Describe specific best management practices (BMPs) developed by the BLM to be used to avoid water quality degradation and to comply with Executive Order 12088.

Stormwater Discharge – Construction Activities. Federal regulations for stormwater discharges require projects that result in construction activity with a land disturbance of 1 acre or more to obtain a NPDES permit. The SWRCB adopted Order 2022-0057-DWQ, General Permit for Storm-Water Discharges Associated with Construction Activities (Construction General Permit), which allows prospective dischargers permit coverage.



The Construction General Permit was developed to allow for statewide permit coverage, that stormwater discharge is regulated, and water resources are protected. The Construction General Permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP to include a description of proposed BMPs to control stormwater discharge from construction work sites. Standard permit registration documents (as listed in Attachment B of the Construction General Permit) include, Site Map, Risk Assessment (Standard or Site-Specific), SWPPP, Post-Construction Water Balance, and Active Treatment Systems (ATS) design as applicable. Other registration documents (e.g. NOI, fee, etc.) are required at the time of application to the RWQCB and prior to the commencement of construction activity. So staff can evaluate potential impacts and proposed mitigation measures to address those impacts, additional information is required.

**DR WATER-7.** Provide the following standard permit registration documents:

- a. Site Map showing information listed in Attachment B of the Construction General Permit;
- b. Risk Assessment using the procedure as described in the Construction General Permit, Appendix 1;
- c. Site specific SWPPP which includes visual, chemical, and sediment monitoring plans described in your application. Include the (DESCP) if both documents will be prepared;
- d. Post-Construction Water Balance completed in accordance with the Construction General Permit, Appendix 2 instructions; and,
- e. Active Treatment Systems (ATS) design (as well as any supporting documentation), proof that the system was designed by a qualified ATS design professional, or rationale why ATS is not considered based on site conditions or other factors.

Water Quality Certification. The application describes construction of solar array on approximately 2,670 acres of land administered by the U.S. Department of Interior, Bureau of Land Management (BLM). According to Appendix E1 Aquatic Resources Delineation Report (ARDR) (TN 257933):

- a. Identifies 21 non-wetland aquatic feature areas totaling approximately 611.6 acres within the 3,227.9-acre study review area.
- b. States that study review area was previously determined by the U.S. Army Corps of Engineers (USACE) to be non-jurisdictional under the Clean Water Act Section 404 program and resulting in no federal waters of the United States (WOTUS), but prior Approved Jurisdictional Determination (AJD) has expired.
- c. Defines the limits of disturbance (LOD) as 2,075.46 acres based on available 30% design civil design drawings.

- d. States project land disturbance would result in permanent impact to approximately 373.5 acres of non-wetland waters of the State.
- e. States additional mitigation measures would likely include required surveys, reporting, and compensatory mitigation.
- f. Recommends a standard Lake and Streambed Alteration (LSA) notification be submitted to California Department of Fish and Wildlife (CDFW) Region 6.
- g. Recommends a Report of Waste Discharge be submitted to the Lahontan Regional Water Quality Control Board (RWQCB) which would likely include a Temporary Impact Restoration Plan, on-site and off-site Tier 3 Alternatives Analysis for temporary and permanent impacts, and a compensatory mitigation plan.
- h. Recommends a Request For Corps Jurisdictional Determination form be submitted to the Los Angeles District USACE to request the Corps confirm if jurisdiction does or does not exist over the aquatic resources on-site.

As the application indicates, USACE has authority in determining federal dredge and fill permitting and associated jurisdictional applicability. However, CDFW and RWQCB regulations would apply for project land disturbance activities resulting in impacts to waters of the State.

Title 20, Appendix B, (g) 14 (A) requires the applicant provide all the information required to apply for applicable permits from various state and federal public resource regulatory agencies. Title 20, Appendix B, (g)14 (B) through (E) requires detailed information which may supplement application information required. For Water Discharge Requirements from the appropriate Regional Water Quality Control Board (RWQCB), application information must comply with relevant provisions of the state water code including information related to a Report of Waste Discharge (ROWD), pursuant to California Water Code Section 13260. Be advised that the CEC, in coordination with the RWQCB, will notify you of the appropriate fee to be submitted which starts to begin a completeness review and development of draft requirements.

Regarding the AJD and LSA notifications, Appendix B, (g) (13) (H) and (i) (2) specify that for each agency with jurisdiction to issue permits and approvals or agencies that would have permit approval or enforcement authority, but for the exclusive authority of the Commission to certify sites and related facilities, the applicant is to submit copies of any preliminary correspondence between the project applicant and state and federal resource agencies regarding whether federal or state permits from other agencies is required.

**DR WATER-8.** Provide a complete a 401 Water Quality Certification/Dredge and Fill application.

**DR WATER-9.** Provide an update regarding USACE permit status.

**DR WATER-10.** Include copies of any preliminary correspondence along with associated meeting notes between the project applicant and agencies regarding permitting issues or other relevant topics, and include the name of officials contacted within each agency.

Flood Control Facilities. The application (Chapter 2, Subsection 2.4.6, p. 2-16) describes construction of three drainage channels between the array fields along with twelve box culverts and eight low-water crossings at the intersection of access roads and drainage channels. The application proposes APM HWQ-2 which stipulates that if crossing existing washes is necessary, at-grade crossings will be constructed to maintain existing flow channels and sediment transport, thereby leaving stormwater runoff volume unchanged. However, the location of proposed at-grade crossing at existing washes is not specified and details are not provided. There are several statements which make unsupported findings or contradict information within the application documents provided. An example of unsupported and contradictory findings includes the statement that existing flow paths and drainage patterns would not be changed in the post-development condition but subsequently states that three distinct drainage channels will be constructed changing the existing flow pattern, along with detention basins, berms, channels, and catchments to redirect water flow. Another example includes the statement that the project is not likely to substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site but also states the project has the potential to increase the frequency of runoff rates by introducing impervious areas and modifying ground surface characteristics through grading and vegetation removal.

**DR WATER-11.** Provide the location of all at-grade crossing at existing washes. Include cross sections with elevations along each crossing alignment. Calculations are required showing estimated changes in flow rates between pre- and post-construction.

**DR WATER-12.** Provide detailed information on the estimated discharges at each of the onsite drainage channel outfall locations where they discharge into natural drainages, as well as detailed plans showing the proposed design at these locations and how it will prevent erosion.

**DR WATER-13.** Provide the appropriate analysis, mapping and discussion to demonstrate that flows diverted through and around the project reasonably approximate existing downstream conditions with regards to peak discharge values, floodplain depth and extent, and that undisturbed areas downstream of the project will not be cutoff from future flows and available sediment transport.

Drainage Patterns/Surface Runoff. The application states that according to the Federal Emergency Management Agency (FEMA), the area in which the project site is located is classified as Zone D, which indicates possible but undetermined flood hazards. The application also states that Stormwater Drainage Report includes details of design of

flood retention features necessary to avoid any increase in downstream flood peak flow rates, thereby minimizing the potential for off-site erosion and siltation of any downstream wash.

**DR WATER-14.** Provide drainage facilities design calculations and criteria including but not limited to capacity of designed system, design storm, and estimated runoff along with assumptions and calculations used to calculate runoff and to estimate changes in flow rates between pre- and post-construction.

**DR WATER-15.** Provide discussion and analysis of the effects of the project on the 100-year flood plain, flooding potential of adjacent lands or water bodies, or other water inundation zones.

Section 3.10, pages 3.10-29 to 3.10-31 states that project construction requires extensive earthwork using heavy equipment, but that minimal alterations would occur to existing drainage patterns and that hydrologic patterns would be preserved. Berms would be constructed along the edge of key drainages likely resulting in alteration of flows during high runoff events, and there would be minor changes to the soil and land cover conditions resulting from vegetation removal, soil compaction, grading, and gravel base for the permanent access roads. Applicant proposed mitigation (APM) HWQ-1, HWQ-2, and GEO-3 are proposed to address erosion or siltation on- or off-site. HWQ-1 states the project would not result in a net impact to on-site drainage or patterns and rates of erosion or sedimentation by requiring the applicant to develop and implement a comprehensive drainage, stormwater, and sedimentation control plan.

**DR WATER-16.** Provide additional discussion and specific details demonstrating the net impact and how specific mitigation measures would be implemented.

Water Supply. The application describes water to be used for construction and operation would be supplied by two existing private groundwater wells, located approximately 40 miles southwest of the project site in Newberry Springs, San Bernardino County, California, and will be trucked on-site for construction and operation purposes. Operational water use would be for potable use, dust control, panel washing, and fire protection.

San Bernardino County Code of Ordinances related to infrastructure improvement standards for new development identifies water supply options as by a water purveyor or a substantiated water well. The proposed method of supply is water hauling from a source outside the project area. Water hauling to supply water for the project for new development may be inconsistent with 83.09.050 Infrastructure Improvement Standards listed in the San Bernardino County Code of Ordinances.

The wells proposed to be used for water supply are owned by Eagle Well Drilling and Pump Service and are located within the Baja Subarea of the Mojave Basin which is within the jurisdictional boundary of the Mojave Water Agency (MWA). Case No. 208568

in the Riverside County Superior Court pertains to the adjudication of the Mojave Basin Area and the MWA was appointed as the basin Watermaster (judgement). The MWA notified CEC staff (TN258484) that the judgment (p. 23, para. 17) states "Except upon further order of the Court, each and every Party, its officers, agents, employees, successors and assigns, is ENJOINED AND RESTRAINED from transporting water hereafter Produced from the Basin Area to areas outside the Basin Area." The Soda Mountain Solar Project area is approximately 20 miles outside of the adjudicated area and the source of water indicated is located inside of the adjudicated area and as such is not a viable source of water for this project.

**DR WATER-17.** Provide a discussion of how the project complies with County ordinance related to infrastructure improvement standards for new development water supply.

**DR WATER-18.** Provide a discussion of how the project complies with state and local laws, ordinances, laws and regulations, or other approvals required to hauling or selling of water.

**DR WATER-19.** Provide a discussion of how the project complies with building, plumbing and fire codes related to water service reliability, health, and safety.

**DR WATER-20.** Provide a discussion of the status of MWA approval for the proposed use and transfer of water supply. Indicate how the water transfer complies with the Judgement. Please provide copies of any correspondence and contemporaneous meeting notes with MRA regarding these issues or other relevant topics and include the name of officials contacted at the agency.

#### Sedimentation/Erosion analysis

The application states that some sedimentation basins will be constructed to regulate flows off-site. These sedimentation basins would capture sediments that would otherwise contribute to the sedimentation/erosion equilibrium in downstream areas, thereby disturbing the balance and resulting in increase in net erosion and change in landform including deepening of channels and changing slopes which affect flow capacities of channels. A detailed analysis of sediment load to downstream areas needs to be provided.

**DR WATER-21.** Provide a sedimentation/erosion analysis and a discussion of measures that would be implemented to ensure that sediment balance in downstream areas would not be disturbed as a result of the sediments captured by the detention basin.

Lahontan Regional Board staff have reviewed relevant portions of the Opt-in application for Soda Mountain Solar Project. Based on the memorandum of agreement (MOA) between the Regional Board and the CEC, initial comments on the project with respect to water quality, what permitting requirements might be applicable, and the additional

information Regional Board staff need to complete an evaluation are listed below. Once the additional information outlined below has been provided, the Lahontan Regional Board staff requests 30 days to complete review and evaluation.

**DR WATER-22.** Please provide specific end use/disposal for all liquid and solid waste streams, including but not limited to excavated soil, solar panel waste, battery energy storage system waste, sanitary waste, process water, panel wash water, waste oil, solvents, and fuels. Additionally, provide a full characterization (chemical composition) of all liquid waste streams. This information is necessary to determine whether the applicant is required to submit a Report of Waste Discharge.

**DR WATER-23.** The Opt-in application states an onsite wastewater treatment system (OWTS) septic system is proposed to support employee sanitary needs. Information is not provided on the OWTS. Provide information on the OWTS including, but not limited to, project description, flow sources, average, daily, and annual volumes, and system type.

The Opt-in application also states any wastewater that cannot be treated by the septic system would be collected and treated or disposed of off-site. Provide information on how this wastewater would be characterized and the determination made that the OWTS cannot treat it. This information is necessary to determine whether the applicant is required to submit a Report of Waste Discharge.

**DR WATER-24.** In order for the Lahontan Water Board to be able to issue necessary permits in line with the CEC, the applicant needs to complete a 401 Water Quality Certification/Dredge and Fill application which can be found here - [https://www.waterboards.ca.gov/lahontan/water\\_issues/programs/clean\\_water\\_act\\_401](https://www.waterboards.ca.gov/lahontan/water_issues/programs/clean_water_act_401).

**DR WATER-24.** Please provide a copy of construction plans that are at least 90 percent complete. This ensures that we've evaluated the final design and identified all significant permitting requirements with respect to water quality, including any additional impacts to surface waters.

**DR WATER-25.** The Water Board's preliminary mitigation ratio for this project is 3 to 1. This ratio assumes no temporal loss, in-kind mitigation, and loss of waters. Provide the compensatory mitigation plan. Additionally, provide a restoration plan for temporary impacts.

**DR WATER-26.** The Jurisdictional Delineation report does not include maps of sufficient scale to identify waters of the state onsite or in the vicinity. This information is necessary to determine whether waters of the state that may be present on site are included in the delineation as the Lahontan Water Board asserts jurisdiction over all channelized flow. Update this report to include appropriately scaled maps and supporting documentation.

**DR WATER-27.** Provide a draft Storm Water Pollution Prevention Plan. This plan will help us better understand stormwater flow paths and capture for reuse and/or percolation, and aid in our determination of whether a National Pollutant Discharge Elimination System (NPDES) permit or an individual stormwater permit would be appropriate for this project.

**DR WATER-28.** Will the project include stormwater infiltration ponds? If so, include those design plans and ensure they show the capacity and where the ponds would discharge if they overflow.

**DR WATER-29.** To determine whether sufficient mitigations are in place and whether a Report of Waste Discharge is required, information is needed that describes the quality of process water and panel wash water. Provide a full characterization (chemical composition) of the process water and panel wash water. Provide a process water flow diagram and panel wash water management plan, to include wash frequencies and estimated volumes of water generation.

**DR WATER-30.** The Opt-in application states the disposal method for process water and panel wash water is evaporation. Information is not provided as to how process water and panel wash water will be evaporated (e.g., evaporation pond). This information is necessary to determine whether a waste management unit (pond) is needed, which would require the applicant submit a Report of Waste Discharge for an evaporation pond. Provide information on how process water and panel wash water will be evaporated. If an evaporation pond will be used, the pond must be constructed, maintained, monitored, and closed in accordance with California Code of Regulations, title 27.

## **WORKER SAFETY**

The location of this proposed project in San Bernardino County has experienced multiple days of high heat (95° F and above as defined by Cal. Code Regs., tit. 8, § 3395) in the past decade due to global climate change and more days are predicted in the future. This important worker safeguard should be discussed and described in full.

**DR WS-1.** Please include a discussion of the implementation of California Code of Regulations, Title 8, section 3395 Heat Illness Prevention in Outside Places of Employment.

Detailed descriptions of the fire suppression systems are necessary for staff to evaluate the impacts of the project.

**DR WS-2.** Please provide more details related to the BESS fire suppression systems to be installed and whether the optional “dry pipe fire suppression system” would be installed. Provide details on how the interior of a BESS system enclosure would be cooled after a fire event if the “dry pipe fire suppression system” would not be installed. Provide information on the leak detection equipment for the BESS. Provide

more information related to fire suppression systems for the overall facility including when traditional water fire suppression would be used and water supply details including the location of hydrants. Also, add setback distances and road width dimensions for the BESS Yard (on Sheets C-101 and C-103 in Appendix A2).

Section 1.2.4.5 (p. 17) notes that the BESS units would be fully certified under NFPA 855.

**DR-WS-3.** As required by NFPA 855, please add a discussion of the BESS hazard mitigation analysis to be prepared in compliance with UL 9540A. The hazard mitigation analysis shall include consideration of potential thermal runaway fault conditions occurring within a single battery storage rack, cell module or cell array (i.e., cell level, module level, unit level and installation level). The analysis shall include mitigations to prevent flammable gases released during fire, battery overcharging, and other abnormal operating conditions within the BESS from creating an explosion hazard that could injure workers or emergency first responders.

Staff reviewed Appendix Q, Table F, and found that some names were omitted.

**DR WS-4.** Please provide the missing names, titles, and addresses of contacts found in Table F.