

DOCKETED	
Docket Number:	24-OPT-03
Project Title:	Soda Mountain Solar
TN #:	259695
Document Title:	Data Request Response #1
Description:	Data Request Response #1 to September 3, 2024 Determination of Incomplete Application and Request for Information
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Soda Mountain Solar Project
CEC Data Request Response #1
October 25, 2024

On September 3, 2024, Soda Mountain Solar LLC received a Determination of Incomplete Application and Request for Information from the California Energy Commission (CEC) for the Soda Mountain Solar Project (24-OPT-03). This transmittal provides Data Request Response #1. Table 1 below identifies the areas within the revised technical reports and environmental analysis documents where the CEC data requests have been addressed. Our team anticipates submitting our second set of data responses in late November 2024.

Table 1. Data Request Response #1 October 25, 2024	
AIR QUALITY	
CEC Data Request	Applicant Response
AQ-1	Appendix C-2 – Dust Control Plan
AQ-2	Section 3-3 Air Quality - October 2024 - Revision 1, Section 3.3.1, Existing Air Quality Conditions at the Project Site, Pages 3.3-19 – 3.3-21 (Tables 3.3-3, 3.3-4, 3.3-5, and 3.3.-6)
AQ-3	Appendix C-1 Air Quality and Greenhouse Gas Technical Report - October 2024 - Revision 1: [Appendix A - CalEEMod Results]
AQ-4	Appendix C-1 Air Quality and Greenhouse Gas Technical Report - October 2024 - Revision 1: [Appendix B - Baseline Environmental Consulting Air Quality Technical Report Memorandum]
AQ-5	Not applicable - Emergency generator removed from the project design.
AQ-6	Section 3-3 Air Quality - October 2024 - Revision 1, Section 3.3.5 Cumulative Impacts, Pages 3.3-31 – 3.3-32
GREENHOUSE GAS EMISSIONS (CLIMATE CHANGE)	
CEC Data Request	Applicant Response
GHG-1	Not applicable - Emergency generator removed from the project design.
GHG-2	Not applicable - Emergency generator removed from the project design.
GHG-3	Not applicable - Emergency generator removed from the project design.
GHG-4	Section 3-8 Greenhouse Gas Emissions - October 2024 - Revision 1, Section 3.8.3.2 Methodology, Pages 3.8-10 – 3.8-11
GHG-5	Section 3-8 Greenhouse Gas Emissions - October 2024 - Revision 1, Section 3.8.3.2 Methodology, Pages 3.8-10 – 3.8-11
GHG-6	Section 3-8 Greenhouse Gas Emissions - October 2024 - Revision 1, Section 3.8.3.2 Methodology, Page 3.8-11
GHG-7	Section 3-3 Air Quality - October 2024 - Revision 1, Section 3.3.3.4 Operations, Page 3.3-24; Section 3-8 Greenhouse Gas Emissions - October 2024 - Revision 1, Section 3.8.3.4 Impact Assessment, Page 3.8-14 Energy use related to cooling of the BESS is anticipated to be offset by the power generated by the project's solar facilities.

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

EXECUTIVE SUMMARY	
CEC Data Request	Applicant Response
ES-1	Chapter 1 Executive Summary – Revision 1 - October 2024, Page 1-4, Figure 11. Project site location and existing conditions pre-construction, Page 1-4.
ES-2	Chapter 1 Executive Summary – Revision 1 - October 2024, Figure 1 2. Project simulation post-construction, Page 1-5.
ES-3	Appendix N Public Notice Package - October 2024 - Revision 1
ES-4	Chapter 1 Executive Summary – Revision 1 - October 2024, Section 1.5 Project Schedule, Page 1-2.
GEOLOGICAL HAZARDS	
CEC Data Request	Applicant Response
GEO-1	Section 3.7 Geology and Soils - October 2024 - Revision 1, Section 3.7.6 Laws, Ordinances, Regulations, and Standards, Page 3.7-25
GEO-2	Section 3.7 Geology and Soils - October 2024 - Revision 1, Section 3.7.7 Agencies Contacted and Permits and Standards, Page 3.7-25 – 3.7-26
HAZARDOUS MATERIALS HANDLING	
CEC Data Request	Applicant Response
HAZ-1	Section 3-9 Hazards and Hazardous Materials - October 2024 - Revision 1, Section 3.9.3.4 Impact Assessment, Table 3.9-3. Hazardous Materials Generated during Construction and Table 3.9-4. Hazardous Materials Generated Annually during Operation, Pages 3.9-30 – 3.9-32.
HAZ-2	Section 3-9 Hazards and Hazardous Materials - October 2024 - Revision 1, Figures 9.2, 9.3, 9.4, Pages 3.9-20 -3.9-22.
HAZ-3	Appendix Q Worker Safety - October 2024 - Revision 1, Sections 1.3.2, page 33. A Risk Management Plan is not required for the project.
HAZ-4	Appendix Q Worker Safety - October 2024 - Revision 1, Sections 1.2.4.1.3, Section 1.2.4.2.2 and Section 1.2.4.2.4. Section 3-9 Hazards and Hazardous Materials - October 2024 - Revision 1, Section 3.9.3.4, Impact HAZ-2
HAZ-5	Appendix Q Worker Safety - October 2024 - Revision 1, Sections 1.2.4.1.3, Section 1.2.4.2.2 and Section 1.2.4.2.4. Section 3-9 Hazards and Hazardous Materials - October 2024 - Revision 1, Section 3.9.3.4, Impact HAZ-2
HAZ-6	Appendix Q Worker Safety - October 2024 - Revision 1, Table E, page 22-31 Appendix R Waste Management Plan - October 2024 - Revision 1, Table E, pages 22-25 Section 3-9 Hazards and Hazardous Materials - October 2024 - Revision 1, Section 3.9.6 Laws, Ordinances, Regulations, and Standards, 3.9-42 – 3.9-45
HAZ-7	Appendix R Waste Management Plan - October 2024 - Revision 1, Table G, page 30 Section 3-9 Hazards and Hazardous Materials - October 2024 - Revision 1, Section 3.9.7 Agencies Contacted and Permits, Pages 3.9-45 – 3.9-46
HAZ-8	Appendix R Waste Management Plan - October 2024 - Revision 1, Table F, page 29

	Section 3-9 Hazards and Hazardous Materials - October 2024 - Revision 1, Section 3.9.7 Agencies Contacted and Permits, Pages 3.9-45 – 3.9-46
HAZ-9	Appendix Q Worker Safety - October 2024 - Revision 1, Table G, page 36. Correspondence with the Fire Department is included on pages 40-43.
LAND USE	
CEC Data Request	Applicant Response
LAND-1	Appendix W, BLM Record of Decision
LAND-2	Section 3-11 Land Use and Planning - October 2024 - Revision 1, Page 3.11-7
LAND-3	Section 3-11 Land Use and Planning - October 2024 - Revision 1, Section 3.11.3.4 Impact Assessment, Impact, Impact LUP-2, Pages 3.11-11
LAND-4	Appendix X – FAA Informal Review Request
LAND-5	The project applicant is currently processing an amended POD, including completing the applicable NEPA analysis, with the Bureau of Land Management. The schedule for the amended POD, NEPA document and ROW Grant authorization are concurrent with the CEC approval process with final BLM approvals estimated for Summer of 2025.
PALEONTOLOGICAL RESOURCES	
CEC Data Request	Applicant Response
PALEO-1	Section 3-22 Paleontological Resources, Section 3.22.1.1, Applicant-Proposed Measures, Page 3.22-1; Section 3.22.3.3 Impact Assessment, Pages 3.22-12-3.22-13; Section 3.22.4 Mitigation Measures, Page 3.22-13
PALEO-2	Section 3-22 Paleontological Resources
PALEO-3	Section 3-22 Paleontological Resources, Section 3.22.6 Laws, Ordinances, and Regulations, Page 3.22-14
PALEO-4	Section 3-22 Paleontological Resources, Section 3.22.7, Agencies Contacted and Permits, Page 3.22-15
PUBLIC HEALTH	
CEC Data Request	Applicant Response
PH-1	Section 3-21 Public Health
PH-2	Section 3-21 Public Health, Section 3.21.1.1, Public Health Data in the Project Vicinity, Pages 3.21-11 – 3.21-12
PH-3	Section 3-21 Public Health, Section 3.21.1.1, Public Health Data in the Project Vicinity, Pages 3.21-11 – 3.21-12 Section 3-9 Hazards and Hazardous Materials - October 2024 - Revision 1, Section 3.9.2.6, Valley Fever, Page 3.9-24
PH-4	Section 3-21 Public Health, Section 3.21.2.1, Sensitive Receptors, Page 3.21-9 (Figure 3.21-1. Sensitive Receptor Location)
PH-5	Section 3-21 Public Health, Section 3.21.1.1, Public Health Data in the Project Vicinity, Pages 3.21-11 – 3.21-12 Section 3-9 Hazards and Hazardous Materials - October 2024 - Revision 1, Section 3.9.2.6, Valley Fever, Page 3.9-24
PH-6	Appendix C-1 Air Quality and Greenhouse Gas Technical Report - October 2024 - Revision 1: [Appendix B - Baseline Environmental Consulting Air Quality Technical Report Memorandum, Page 2]

PH-7	Section 3-21 Public Health, Section 3.21.3.4, Impact Analysis, Pages 3.21-14 – 3.21-16); and Appendix C-1 Air Quality and Greenhouse Gas Technical Report - October 2024 - Revision 1: [Appendix B - Baseline Environmental Consulting Air Quality Technical Report Memorandum]
PH-8	Appendix C-1 Air Quality and Greenhouse Gas Technical Report - October 2024 - Revision 1: [Appendix B - Baseline Environmental Consulting Air Quality Technical Report Memorandum (Attachment D)]
PH-9	Section 3-21 Public Health, Section 3.21.6, Laws, Ordinances, Regulations, and Standards, Page 3.21-17; and Section 3.21.7, Agencies Contacted and Permits, Page 3.21-18
PH-10	Section 3-21 Public Health, Section 3.21.6, Laws, Ordinances, Regulations, and Standards, Page 3.21-17; and Section 3.21.7, Agencies Contacted and Permits, Page 3.21-18
SOILS	
CEC Data Request	Applicant Response
SOILS-1	Appendix R Waste Management Plan - October 2024 - Revision 1, pages 8 and 9 and Table C, page 10
SOILS-2	Appendix R Waste Management Plan - October 2024 - Revision 1, Attachment 1, pages 35-40
SOILS-3	Appendix I Phase I Environmental Site Assessment - October 2024 - Revision 1
Traffic and Transportation	
TRANS-1	Section 3-17 Transportation - October 2024 - Revision 1, Section 3.17.2.1 Regional and Local Roadway Facilities, Page 3.17-12
TRANS-2	Appendix M Transportation Analysis - October 2024 - Revision 1, Vehicle Miles Traveled Assessment, Pages 21-22
TRANS-3	Appendix M Transportation Analysis - October 2024 - Revision 1, Data Collection, Pages 13-18 PeMS graphical data is provided in Appendix C Traffic Counts and the corresponding analysis volumes in the Vistro reports in Appendix D Vistro Reports. Both are appendices of Appendix M Transportation Analysis - October 2024 - Revision 1.
TRANS-4	Appendix M Transportation Analysis - October 2024 - Revision 1, Data Collection, Pages 15-18
TRANS-5	Appendix M Transportation Analysis - October 2024 - Revision 1, Data Collection, Pages 13
TRANS-6	Appendix M Transportation Analysis - October 2024 - Revision 1, Off-Ramp Queuing Analysis, Pages 18-19. While Caltrans was not consulted on the matter, we conducted operational analyses using HCM methodologies which are consistent with Caltrans methodologies. Additionally, the project would not impact access to Caltrans facilities.
TRANS-7	Section 3-3 Air Quality - October 2024 - Revision 1, Section 3.3.3.5 Applicant-Proposed Measures, Pages 3.3-26 – 3.3-27 The project proposes improvement of a portion of Razor Road, which would include grading to widen or level the existing road and importing and compacting materials, such as soil and gravel. The Razor Road improvements may also expand the roadway width up to approximately 26 feet wide. In combination with the dust control measures, the improvements would control dust from construction vehicles.
TRANS-8	Chapter 3.1 Aesthetics, Section 3.1.3.3 Impact Assessment, Impact AES-4, Pages 3.1-31 – 3.1-34. Appendix E ForgeSolar Glare Analysis Report of EIR Appendix B Visual Resources Report
TRANS-9	Section 3-17 Transportation - October 2024 - Revision 1, Section 3.17.3.3 Impact Assessment, Impact TR-1, Page 3.17-15
TRANS-10	Chapter 3-16 Recreation, Section 3.16.3.4 Impact Assessment, Pages 3.16-10 – 3.16-11.

	The project would close Razor Road during the approximately 18 months of project construction for site security. During that time, public access to the Razor OHV recreation area would be maintained from the Basin Road exit on I-15.
TRANS-11	Section 3-17 Transportation - October 2024 - Revision 1, Section 3.17.6 Laws, Ordinances, Regulations, and Standards, Page 3.17-23
TRANS-12	Section 3-17 Transportation - October 2024 - Revision 1, Section 3.17.7 Agencies Contacted and Permits, Page 3.17-23 – 3.17-24
TRANSMISSION SYSTEM DESIGN	
CEC Data Request	Applicant Response
TSD-1	Appendix A1 Engineering Generation Facility Description, Design and Operation - October 2024 - Revision 1, Figure 1, Substation One-Line Diagram
TSD-2	Appendix A1 Engineering Generation Facility Description, Design and Operation - October 2024 - Revision 1, Figure 2, Switchyard One-Line Diagram
TSD-3	Appendix A1 Engineering Generation Facility Description, Design and Operation - October 2024 - Revision 1, Figure 3, Gen-tie Structure Configuration and Section 1.1.4, Facility Description, Overhead Generator Tie-Line, pages 3 and 4.
TSD-4	Appendix A1 Engineering Generation Facility Description, Design and Operation - October 2024 - Revision 1, Section 1.1.4, Facility Description, Overhead Generator Tie-Line, pages 3 and 4.
TSD-5	Please see Confidential Appendix O3, Interconnection Facilities Study Report – Supplement No 2 and Confidential Appendix O4, System Impact Restudy
TSD-6	Appendix A1 Engineering Generation Facility Description, Design and Operation - October 2024 - Revision 1, Section 1.1.2, Improvement Measures, page 2 and Section 1.1.4, Facility Description, Overhead Generator Tie-Line, pages 3 and 4.
TSD-7	Appendix A1 Engineering Generation Facility Description, Design and Operation - October 2024 - Revision 1, Section 1.1.4, Facility Description, page 3. There are no offsite transmission upgrades required due to downstream impacts. The only items that are required in terms of upgrades are related to protection settings at the Mead and Adelanto substations, which do not involve physical improvements or environmental impacts. No other upgrades are required.
WASTE MANAGEMENT	
CEC Data Request	Applicant Response
WASTE-1	Appendix R Waste Management Plan - October 2024 - Revision 1, Table E, pages 22-25
WORKER SAFETY	
WS-1	Appendix Q Worker Safety - October 2024 - Revision 1, Section 1.2.4.1.2, Construction Heat Illness Prevention Plan, page 9
WS-2	Appendix Q Worker Safety - October 2024 - Revision 1, Section 1.2.4.5.2, BESS Hazard Mitigation Analysis and Fire Suppression, pages 18-20
WS-3	Appendix Q Worker Safety - October 2024 - Revision 1, Section 1.2.4.5.2, BESS Hazard Mitigation Analysis and Fire Suppression, pages 18-20
WS-4	Appendix Q Worker Safety - October 2024 - Revision 1, Section 1.4, Table F, page 35