# Notice of Preparation of a Draft Environmental Impact Report for the Soda Mountain Solar Project (24-OPT-03)

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| **Date:** | August 5, 2025 |
| **To:** | Reviewing Agencies and Other Interested Parties |
| **From:** | California Energy Commission (CEC) |
| **Project Title**: | Soda Mountain Solar Project (project) |
| **Project Applicant:** | Soda Mountain Solar, LLC |
| **Docket Log:** | 24-OPT-03 |
| **NOP Review Period:** | August 5, 2025 to September 3, 2025 |

In accordance with California Code of Regulations, title 14, section 15082, California Energy Commission (CEC) staff has prepared this Notice of Preparation (NOP) to inform the Governor's Office of Land Use and Climate Innovation (LCI) (formerly known as the Office of Planning and Research), and each responsible and trustee agency that an Environmental Impact Report (EIR) will be prepared for the Soda Mountain Solar Project (project) proposed by Soda Mountain Solar, LLC (applicant) in San Bernardino County, on approximately 2,670 acres of land administered by the U.S. Bureau of Land Management (BLM). A copy of this NOP will also be filed with the county clerk in the county in which the project would be located.

The CEC is the lead agency under the California Environmental Quality Act (CEQA) and, under Public Resources Code section 25545.7, must prepare an environmental impact report for this project. Upon receipt of an application, the CEC has exclusive authority to certify the site and related facility. With certain exceptions, the issuance of a certificate by the CEC is in lieu of any permit, certificate, or similar document required by any state, local, or regional agency, or federal agency to the extent permitted by federal law, and supersedes any applicable statute, ordinance, or regulation of any state, local, or regional agency, or federal agency to the extent permitted by federal law.

Further information about the Opt-In Certification Program can be found on the CEC website at: https://www.energy.ca.gov/programs-and-topics/topics/power-plants/opt-certification-program.

## Responsible and Trustee Agencies

Pursuant to the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15082(b)), the CEC requests LCI and responsible and trustee agencies' views on the scope and content of the environmental document relevant to each agency's area of statutory responsibility that must be included in the draft EIR. Responsible agencies for this project are the State Water Resources Control Board and Regional Water Quality Control Board. The only trustee agency identified for this project is the California Department of Fish and Wildlife. At a minimum, the response shall identify:

- The significant environmental issues and reasonable alternatives and mitigation measures that the responsible or trustee agency, or the LCI will need to have explored in the draft EIR; and
- Whether the agency will be a responsible agency or trustee agency.

Due to the time limits mandated by State law, responses must be sent at the earliest possible date but not later than 30 days after receipt of this notice. Based on comments received by public agencies on the scope and content of the EIR, CEC staff may request additional information from the applicant to address such comments. If a responsible or trustee agency, or LCI, fails by the end of the 30-day period to provide the CEC with either a response to the notice or a well-justified request for additional time, CEC staff will presume that the entity has no response.

## Document Availability

The CEC has a webpage for the Soda Mountain Solar Project. The application and related project documents are viewable by clicking the "Docket Log (24-OPT-03)" link located near the upper right corner of the project webpage: https://www.energy.ca.gov/powerplant/solar-photovoltaic-pv-battery-energy-storage/soda-mountain-solar-project.

The direct link to the project docket log is: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=24-OPT-03.

Interested parties may also subscribe via the project webpage (linked above) to receive electronic notices of all project-related activities and documents related to CEC's evaluation of the application—look for the box with the words "SUBSCRIBE SODA MOUNTAIN SOLAR" to add your subscription email. Alternatively, you can go to CEC's subscription page

(https://www.energy.ca.gov/subscriptions) under "Power Plants Licensing and Projects" and check the "Soda Mountain Solar" box under "Projects Under Review Topics."

## Submitting Comments

Please submit comments electronically to the project docket. To use CEC's electronic commenting feature, go to CEC's webpage for this proceeding, (identified above), click on the "Submit eComment" link, and follow the instructions in the online form. If you have a file you would like to submit, use the "Submit e-filing" link. Be sure to include the project name in your comments. Once filed, you will receive an email with a link to them and the comments will be part of the proceeding's public record.

## Project Location and Existing Conditions

The project is located entirely on federally owned land managed by the BLM. The 2,670-acre project site is located approximately 7 miles southwest of the community of Baker in unincorporated San Bernardino County, California (Figure 2-1 and 2-7), approximately 50 miles northeast of Barstow. The project site is in portions of Sections 1 and 11-14, Township 12 North, Range 7 East; Sections 25, Township 13 North, Range 7 East; Sections 6, 7, and 18, Township 12 North, Range 8 East; Sections 17-21, 29-32, Township 13 North, Range 8 East, San Bernardino Meridian, California.

The project is bounded directly to the east by the Mojave National Preserve (administered by the National Park Service) and BLM lands, including the Rasor Off-Highway Vehicle (OHV) Recreation Area at the southeast corner. Interstate 15 (I-15), the former Arrowhead Trail Highway, runs along the western boundary of the project site. The Rasor Road Services Shell Oil gas station is located off I-15 southwest of the project site, along the access road to the project site. A residence is next to the gas station, roughly 260 feet southwest of the proposed boundary. There are no other sensitive receptors within 1,500 feet of the project site. Approximately four storm drain culverts run under I-15 adjacent to the project site. Primary access to the project site is from the Rasor Road northbound exit off I-15.

## Project Description

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 (operations and maintenance buildings, stormwater infrastructure, and related infrastructure improvements) to generate and deliver renewable electricity to the statewide electricity transmission grid. The project would generate up to 300 megawatts (MW) of renewable energy and include up to 300 MW/1,200 MW-hours (MWh) of battery storage. The batteries would be lithium ion or similar. The project would include a switchyard and substation.

The power produced by the project would be conveyed to the regional electrical grid through an interconnection with the existing Mead-Adelanto 500-kilovolt (kV) transmission line operated by the Los Angeles Department of Water and Power (LADWP). The approximately 200 foot wide, 1-mile long 500 kV gen-tie line would run from the project substation, just southeast of I-15, to the switchyard and then to the point of interconnection with the existing LADWP Mead-Adelanto transmission line. A small segment of the gen-tie line, approximately 450 feet, would cross I-15.

For more details about the project, see Chapter 2 Project Description in TN 264913, at the following link:
Updated Project Description and Responses to REV 1 DR BIO-2 and REV 1 DR ES-1,
(https://efiling.energy.ca.gov/GetDocument.aspx?tn=264913&DocumentContentId=101687).

**Probable Environmental Effects**

The CEC will prepare a Staff Assessment (SA). The SA will include a Draft EIR following the requirements of the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) and the CEQA Guidelines (Cal. Code of Regs., tit. 14, div. 6, ch. 3). The purpose of the SA, which will include a Draft EIR, is to provide objective information regarding the project's significant effects on the environment, identify possible ways to minimize the significant effects, describe reasonable alternatives to the project, assess the project's conformance with applicable local, state, and federal laws, ordinances, regulations, and standards, and provide an evaluation of the extent to which the application complies with additional licensing requirements set forth in the Public Resources Code. This information will be considered by the CEC Commissioners in deciding whether to grant a certificate to build and operate the project. The SA will include an Engineering Evaluation, Environmental Impact Assessment, assessment of the

Mandatory Opt-In Requirements, and evaluation of Other Key Topics as identified in **Table 1**.

**Table 1: Staff Assessment Topic Outline**

| Proposed Section | Topics Included |
|---|---|
| Engineering Evaluation | • Facility Design<br>• Facility Reliability<br>• Transmission System Engineering<br>• Worker Safety and Fire Protection |
| Environmental Impact Assessment | • Air Quality<br>• Biological Resources<br>• Climate Change/Greenhouse Gas Emissions<br>• Cultural/Tribal Cultural Resources<br>• Efficiency/Energy Resources<br>• Geology/Paleontology/Minerals<br>• Hazards/Hazardous Materials/Wildfire<br>• Land Use/Agriculture/Forestry<br>• Noise and Vibration<br>• Public Health<br>• Socioeconomics<br>• Solid Waste<br>• Transmission Line Safety and Nuisance<br>• Transportation<br>• Visual Resources<br>• Water Resources<br>• Alternatives Analysis |
| Mandatory Opt-In Requirements | • Workforce Requirements<br>• Community Benefits Agreement<br>• Net Positive Economic Benefit |
| Other Key Topics | • Environmental Justice<br>• Compliance Conditions<br>• Compliance Monitoring |

Preliminary review of the application and other filed information indicates the following probable environmental effects:

Air Quality

The project site is located in San Bernardino County, within the part of the Mojave Desert Air Basin under the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD). The project area is currently designated as a non-attainment area with respect to National Ambient Air Quality Standards and California Air Quality Standards for ozone and particulate matter of 10 micrometers and smaller in diameter (PM10), and California Air Quality Standards

for particulate matter of 2.5 micrometers or less (PM2.5) (Cal. Code Regs., tit. 17, §§ 60200-60210).

Construction of the project is estimated to require 18 months to complete. Construction and operational emissions are not anticipated to exceed the significance thresholds set by the MDAQMD. Staff will evaluate the significance of the ambient air quality impacts of the project based on an air quality impacts assessment.

The EIR will evaluate whether the project would result in potentially significant air quality impacts including compliance with the applicable air quality plan; result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under any ambient air quality standards; expose sensitive receptors to substantial pollutant concentrations from criteria pollutants; and/or result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Biological Resources

Staff anticipates that project construction and operation could have a potentially significant impact on biological resources. Specifically, impacts could affect various special-status wildlife species, including state and federally listed species. Ground disturbance proposed as part of the project could have adverse impacts to sensitive animals, such as desert tortoise (*Gopherus agassizii*), burrowing owl (*Athene cunicularia*), and desert bighorn sheep *(Ovis canadensis nelsoni*), and their habitats. Increased levels of human presence, noise, and fugitive dust could also adversely affect nesting birds along with other sensitive wildlife individuals, burrows, and dens if present within or adjacent to construction work areas. The introduction or proliferation of non-native weeds to sensitive desert vegetation communities may result in habitat degradation for a variety of common and special-status species known from the region. Operational impacts from increased noise and human presence and the installation of lighting could adversely affect wildlife use and movement through the area.

The applicant has proposed various mitigation measures to reduce the severity of any such impacts, including, but not limited to, implementing advanced technology that minimizes ground-disturbance due to site grading, conducting preconstruction surveys for special-status plants and wildlife, installing desert tortoise exclusion fencing, requiring worker environmental awareness training to all project staffing, and providing compensatory habitat mitigation. Staff will

evaluate the adequacy and effectiveness of these measures and anticipates drafting additional measures based upon independent research and consultation with the California Department of Fish and Wildlife (CDFW), the United States Fish and Wildlife Service (USFWS), and the United States Department of Interior Bureau of Land Management (BLM).

Cultural Resources and Tribal Cultural Resources

The project may impact cultural resources based on preliminary review. The cultural resources inventory report prepared by the applicant did not identify any archaeological resources that meet the California Register of Historical Resources criteria as historical resources. A built environment resource does qualify as a historical resource subject to the requirements of CEQA. It was determined that the proposed project would not cause a substantial adverse change in the significance of the historical resource. The inventory suggests there is a moderate potential to encounter buried archaeological deposits, and unknown human remains in the project site.

Ground disturbance proposed as part of the project could encounter and damage buried resources that meet CEQA's criteria for historical resources, likely resulting in a significant impact under CEQA. The applicant has proposed various mitigation measures to reduce the severity of any such impacts, including archaeological monitoring, worker awareness training, and implementing a discovery protocol. Staff will evaluate the adequacy and effectiveness of the applicant's proposed mitigation.

For tribal cultural resources, CEQA requires the lead agency to consult with tribes to identify such resources and assess potential impacts. The CEC will send invitation letters offering to consult with all tribes traditionally and culturally affiliated with the project area. Impacts on tribal cultural resources have not been determined at this time.

Geology, Paleontology and Minerals

As described in California Geological Survey Note 36, the project is in the southeastern portion of the Mojave Desert geomorphic province of California. The project is in the Soda Mountains, specifically on alluvial fan deposits in an intermontane desert valley. The applicant conducted geotechnical and paleontological investigations of the project site. Quaternary geologic units at, and near, the project include old (late to middle Pleistocene), young (Holocene to late Pleistocene), and active (Late Holocene) alluvial fan deposits and young

(Holocene to late Pleistocene) eolian and dune deposits. Bedrock geologic units exposed at the surface near the project include Neogene volcanic rocks, Mesozoic granitic rocks, and other Mesozoic to Precambrian intrusive igneous rocks. The Soda Mountains also contain Mesozoic marine and continental sedimentary rocks, Mesozoic volcanic rocks, and Paleozoic continental margin sedimentary rocks.

Surface fault rupture, seismic shaking, soil corrosion, and soil erosion are potentially significant geologic hazards that may require mitigation. There are many major active faults in the Mojave Desert geomorphic province and southeastern California. The project is not in an Alquist-Priolo Earthquake Fault Zone. The geotechnical investigation did not identify any active faults at the project site. The closest active fault zones to the project are the Red Lake Pass Fault, eastern California Shear Zone, Garlock Fault, and San Andreas Fault Zone. The Red Lake Pass Fault is 2.2 miles west of the project. The investigation identified potentially active faults, such as the Baker Fault, north and east of the project. A potentially active fault may intersect the project's eastern area. The fault is not observed at the surface and is potentially buried under sedimentary deposits.

Earthquakes on nearby faults may cause the project to experience seismic shaking and related geologic hazards. The project is sited on alluvial fan deposits with desert pavement surfaces, an important geologic feature. Construction may increase sediment and soil erosion through excavation, grading, and soil compaction. The applicant proposes mitigation, through design, grading, and construction, including stormwater management, to mitigate direct and indirect impacts associated with geologic hazards to less than significant.

The applicant's paleontological investigation conducted a museum records search and did not identify known paleontological resource sites within one mile of the project. However, the search identified known fossil sites in Pleistocene alluvial, fluvial, and lacustrine sedimentary deposits in the area.

In Quaternary deposits, especially alluvial fans, the potential for encountering fossils increases with depth. Holocene to late Pleistocene and late to middle Pleistocene alluvial fan deposits were assigned low to moderate paleontological sensitivity. Holocene alluvial fan deposits were assigned low paleontological sensitivity. Holocene to late Pleistocene eolian and dune deposits, Mesozoic volcanic, and intrusive igneous rocks of all ages were assigned very low paleontological sensitivity.

Paleontological resources could be encountered during construction activities where native soil and rock formations would be disturbed, such as grading, trenching for utilities, excavation for foundations, and installation of support structures. The applicant proposes mitigation through planning, training, and monitoring to reduce potentially significant impacts on unique paleontological resources from construction.

No active mining operations occur at the project site. The project is not in a designated San Bernardino County designated mineral resource zone nor in a Bureau of Land Management area for high mineral potential. The applicant anticipates no impacts to known mineral resources nor identified mineral resource recovery sites.

Hazards, Hazardous Materials, and Wildfire

The project would use standard construction hazardous materials and small quantities of hazardous materials during project operations that could pose a risk to workers and the public.

The project site is located in unincorporated San Bernardino County and would be subject to wildland fires and operation of the proposed BESS facility could increase the risk of wildfire. Staff will assess this potential risk and propose engineering and administrative controls, as well as enhanced emergency response, to reduce this risk.

Land Use

The proposed project would be located on federal lands managed by the U.S. Bureau of Land Management (BLM). BLM land use plans and policy guidance documents applicable to the project site and associated facilities include the California Desert Conservation Area Plan, as amended by the Desert Renewable Energy Conservation Plan, and by the West-Wide Energy Corridor Record of Decision. Staff will evaluate potential conflicts with these applicable plans and policies and BLM's associated land use and management designations. Staff will also evaluate physical compatibility of the proposed project with recreational use of the adjacent Rasor Road Off-Highway Vehicle Area.

Noise and Vibration

The noise levels associated with temporary project construction activities may be potentially significant but could be reduced through the implementation of a construction noise plan that will be identified and evaluated as appropriate,

including conditions of certification to ensure adverse noise and vibration impacts are reduced to less than significant or eliminated. Potential impacts could include excessive noise at the project's noise sensitive receptors. No significant noise and vibration impacts associated with project operation are anticipated.

Public Health

The project would be located in unincorporated San Bernardino County within the Mojave Desert Air Basin under the jurisdiction of the Mojave Desert Air Quality Management District.

Construction of the proposed project is estimated to require 18 months to complete. Construction activities could result in emissions of toxic air contaminants (TACs), primarily from diesel equipment, and may disturb soil containing Coccidioides spores, potentially exposing workers and the public to Valley fever. Staff will evaluate these potential impacts through a health risk assessment and assess the effectiveness of proposed dust control and diesel emissions reduction measures.

Although the project would not emit TACs during normal operation, potential fire or thermal runaway event in the battery energy storage system (BESS) could release TACs. CEC staff has not completed its analysis of the significance of the project's potential construction or operational impacts and is yet to reach a definitive conclusion. The EIR will discuss whether the project would expose sensitive receptors to substantial pollutant concentrations of toxic air contaminants during construction and during a potential BESS fire and propose mitigation measures when necessary to reduce any health risks.

Socioeconomics

The project site is located in a rural area of unincorporated San Bernardino County and could be subject to wildfire risk. Operation of the proposed BESS facility may increase the potential for fire in the event of a thermal runaway incident.

Staff will evaluate the potential socioeconomic impacts associated with fires at the proposed BESS and solar facilities, including the extent to which such an event could place additional demands on emergency response services, particularly the nearest fire department located in the community of Baker, approximately 7 miles northeast of the project site.

Transportation

The Project will generate a nominal amount of vehicle trips during on-going operations; however, during the construction period there may be transportation impacts to I-15, particularly in the eastbound direction on Friday afternoons. It is anticipated that this impact can be mitigated by adjusting the hours of construction on Fridays.

It is anticipated that the Project will be required to prepare and implement a Construction Management Plan to address the movement of workers, vehicles, equipment, and materials, including arrival and departure schedules, carpooling, a parking/staging plan, and designated workforce and delivery routes.

Visual Resources

Operation of the project including arrays of photovoltaic panels, battery enclosures, inverter structures, substation, switchyard, and 500-kV gen-tie line could have potentially significant impacts on visual resources. The aesthetic effects of the project would be assessed from 10 key observation points, evaluating the project from several locations and viewing distances to provide a representative cross-section of affected landscapes. The locations were selected based on the project's viewshed, visual exposure, and potential viewers. The applicant has proposed various mitigation measures to reduce the severity of any aesthetic impacts, including the integration of visual design elements into the construction plans, details, shop drawings, and specifications; implementation of a Conceptual Outdoor Lighting Plan; and implementation of a Conceptual Landscape Plan for the purposes of facility screening and aesthetic enhancement. Staff will evaluate the adequacy and effectiveness of the applicant's proposed mitigation. The EIR may include additional mitigation pertaining to surface treatment of structures, vegetation management, landscape screening, and night lighting management.

Water Resources

Project construction would disturb more than one acre of land and be subject to construction-related stormwater permit requirements of California's National Pollutant Discharge Elimination System General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) administered by the State Water Resources Control Board. In addition, a drainage, erosion and sedimentation control plan (DESCP) would also be adopted to address stormwater management during

operation. If necessary, at-grade crossings of washes would be constructed to minimize impact to stormwater runoff.

Based on the revised water supply assessment (TN 264970), water for the project would be supplied by up to five onsite groundwater production wells. It appears that there has been no actual characterization of the Soda Mountain subbasin groundwater resource and Department of Water Resources records suggest there are no existing water wells. Water demand for dust suppression, soil compaction and grading during project construction is anticipated at 319 acre-feet (AF) over an 18-month period, although adoption of applicant-proposed mitigation measure APM BIO-3 could reduce that demand to 223 AF. The operational water demand of 5.6 AFY would be primarily for washing PV panels.

During construction, sanitary facilities consisting of portable toilets would be supplied and maintained by a third-party vendor. The sanitary wastewater needs of the operations and maintenance building would be supported by a septic system.

CEC staff will evaluate project impacts on water resources and identify mitigation measures if necessary.

Worker Safety and Fire Protection

Industrial environments pose inherent safety and health risks to workers during construction and operations, such as fire risk. Worker safety and fire protection are regulated through laws, ordinances, regulations, and standards, at the federal, state, and local levels. Workers at an energy facility operate equipment and handle hazardous materials and may face hazards that could result in accidents or serious injury. Protective measures are employed to eliminate or reduce these hazards or to minimize the risk through special training, protective equipment, and procedural controls. The project would use standard construction hazardous materials and small quantities of hazardous materials during project operations that could pose a risk to workers. Operation of the proposed BESS facility could pose a risk of fire if a thermal runaway in a battery cell, module, or unit occurred. Staff will assess this potential risk and propose engineering and administrative controls, as well as enhanced emergency response, to reduce this risk.

**Public Scoping Meeting**

The Opt-In Certification process requires a public informational and scoping meeting to be held as near to the project site as practicable, and within 30 days of CEC's determination of a complete application on July 31, 2025 (TN 265194). The CEC expects this event will occur by the end of August pending confirmation of the venue and the availability of key participants. The informational/scoping meeting will be noticed via the project docket (weblink provided above) at least 10 days prior to its occurrence and will contain information specific to the public meeting and how to participate.

Attachments:

1. Figure 2-1, Project Site Vicinity (From Updated Project Description and Responses to REV 1 DR BIO-2 and REV 1 DR ES-1, TN 264913)
2. Figure 2-7, Project Overview Site Plan (From Updated Project Description and Responses to REV 1 DR BIO-2 and REV 1 DR ES-1, TN 264913)

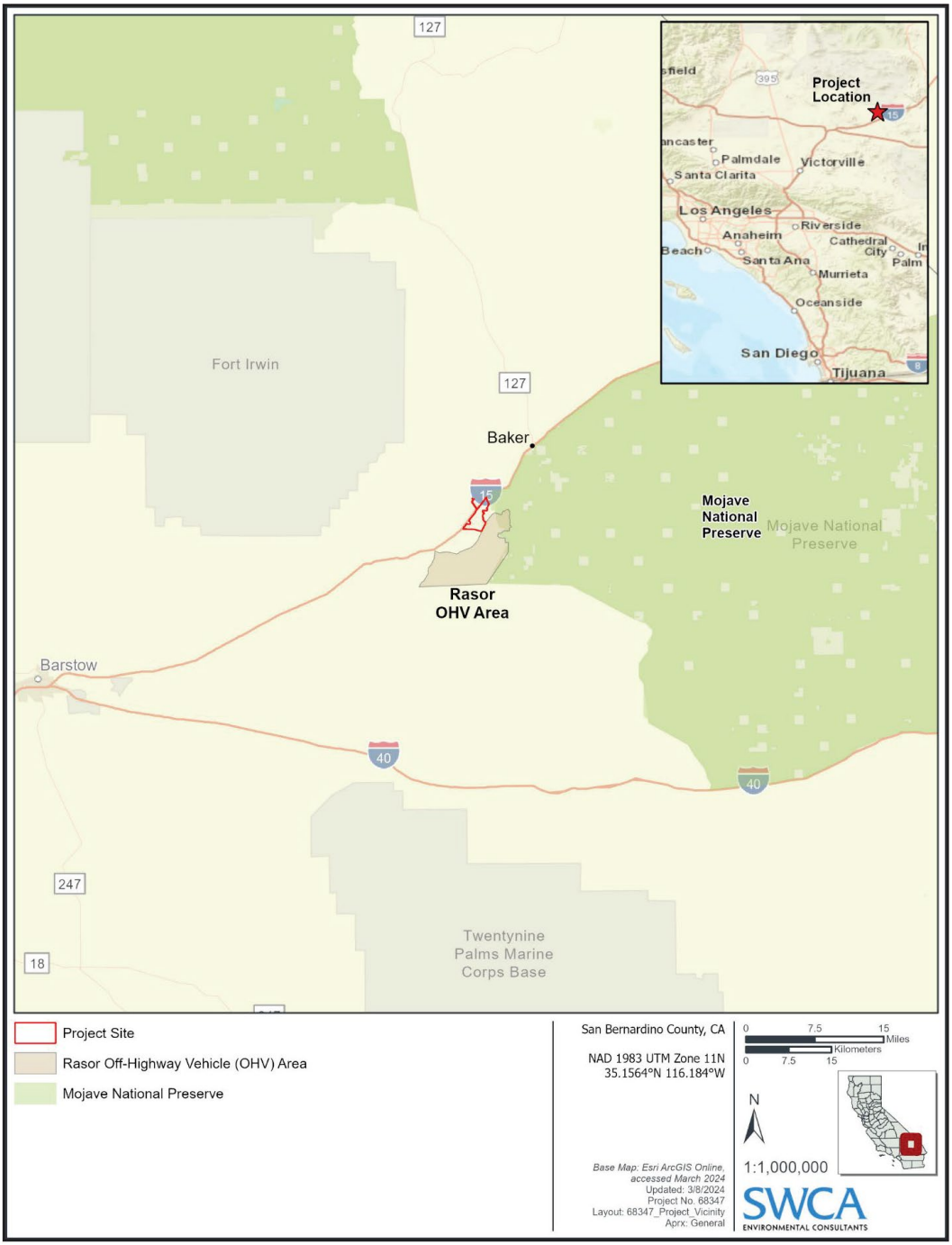



**Figure 2-1. Project site vicinity.**

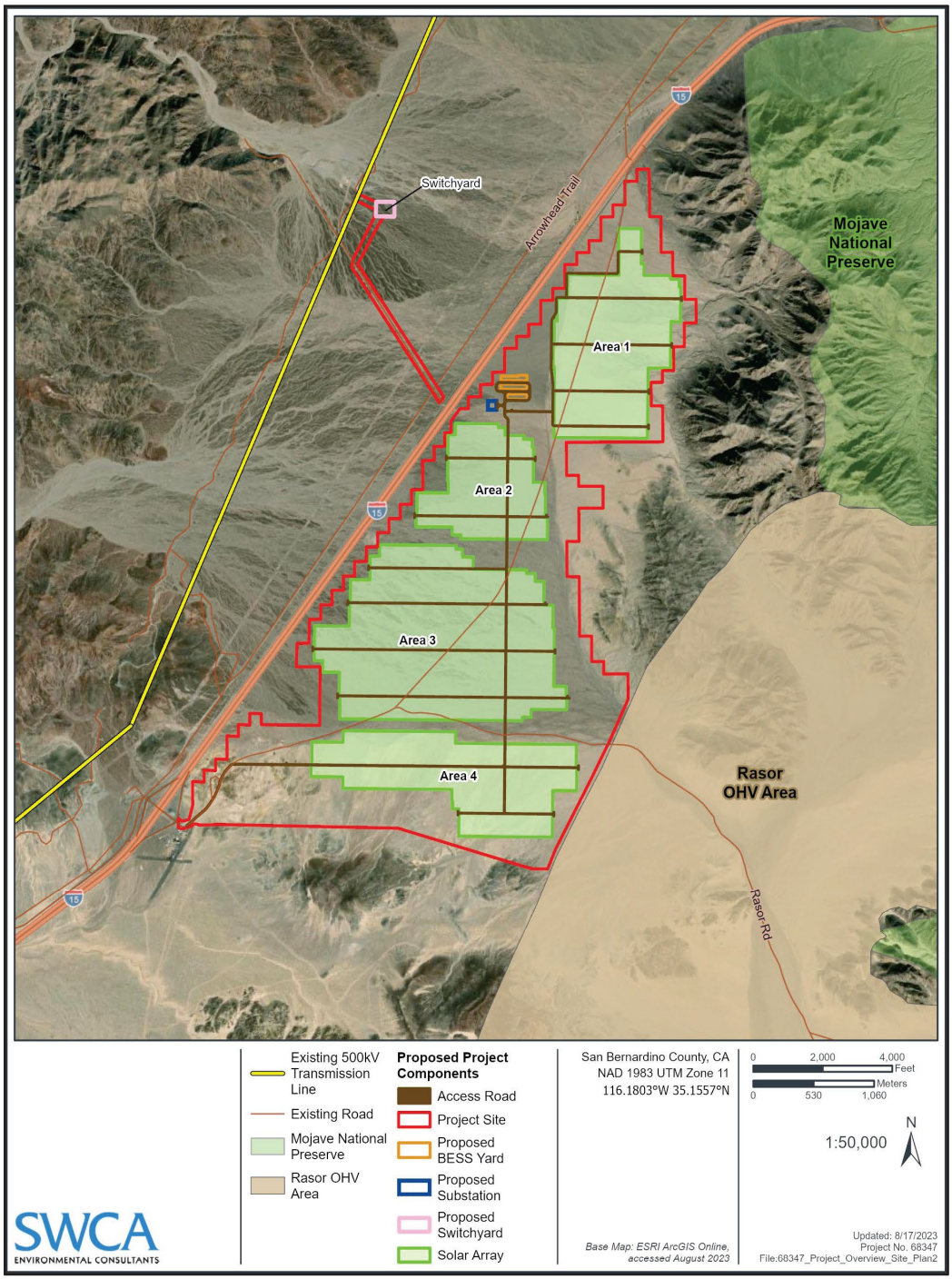



**Figure 2-7. Project overview site plan.**