Attachment A for Summary Form

Project Description (Proposed actions, location, and/or consequences).

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.

Assessor Parcel Numbers

054320156	054324119	054323116
054324117	054320109	054321107
054325101	054330203	054320107
054320157	054324120	054320110
054321118	054325112	054324114
054320112	054320131	054323113
054330102	054320106	054324116
054321117	054323117	054323114
054320111	054324101	
054325113	054320105	

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

Not all potentially significant impacts of the proposed project would be reduced to less than significant levels with Conditions of Certification (COCs) and Mitigation Measures (MMs) incorporated. The proposed Soda Mountain Solar Project would have significant unavoidable impacts to biological resources and visual resources. The Environmentally Superior Alternative, the Big Horn Sheep Buffer and Relocated Battery Energy Storage System Alternative #2, proposes a project design that would reduce impacts to biological resources to less than significant but impacts to visual resources for this alternative would remain significant and unavoidable. The COCs are proposed for the jurisdictional project components, and the MMs are recommended for the non-jurisdictional project components. The project would not be consistent with all applicable plans, policies, and regulations. The following summarizes staff's conclusions. Please see the Staff Assessment for more details.

Air Quality. *Less Than Significant with Mitigation Incorporated*. With the implementation of staff-proposed COCs, the project would have a less than significant impact on air quality and be consistent with applicable plans, policies, and regulations. The COCs require the project owner to sufficiently reduce fugitive dust and other criteria pollutants from project construction and operation. Staff's proposed COCs are effective and comprehensive for reducing air quality impacts during construction and operation. No mitigation measures for the non-jurisdictional components are recommended for Air Quality and impacts would be less than significant.

Biological Resources. *Significant and Unavoidable Impact*. The proposed project would result in significant and unavoidable impacts to desert bighorn sheep (*Ovis canadensis nelsoni*) individuals and their movement within and surrounding the project area. This species is designated as Fully Protected by the California Department of Fish and Wildlife (CDFW), pursuant to California Fish and Game Code Section 4700. Additionally, significant and unavoidable impacts would occur as a result of inconsistencies with applicable California Fish and Game Code sections that prohibit take of fully-protected species. Desert bighorn sheep in the Soda and Cady Mountains form a critical part of the Mojave Desert metapopulation and rely on intermountain movement corridors for gene flow, recolonization, and access to seasonal resources. While desert bighorn sheep are known to move within and around the project area, staff is concerned that these areas would be avoided during construction and operation due to increased human presence and limited site availability through the solar arrays. Additionally, the proposed project could compromise the use of the planned wildlife crossing being installed as part of the Brightline West High-Speed Rail Project, which is located within 1.25 miles of the project area and is designed to restore connectivity between desert bighorn sheep populations fragmented by I-15. Impacts that displace sheep, remove important foraging habitat, or result in mortality or decreased fitness would be considered significant and unavoidable. Staff has proposed COCs to reduce construction-related impacts to desert bighorn sheep, including implementing seasonal work restrictions to avoid critical lambing periods, installation of artificial water sources and exclusionary fencing, funding radio collaring to better understand how the project influences movement in the region, and ongoing monitoring. With the implementation of these COCs, project impacts would be reduced but not to levels that would be less than significant.

Construction and operation of the proposed project would not have any impact on federal or state listed plants but may impact federal or state listed wildlife and other wildlife species designated as special-status by CDFW and/or BLM, including, but not limited to, Crotch's bumble bee (*Bombus crotchii*), monarch butterfly (*Danaus plexippus*), desert tortoise (*Gopherus agassizii*), Swainson's hawk (*Buteo swainsoni*), and western burrowing owl (*Athene cunicularia hypugaea*), as well as native and migratory birds occurring within and adjacent to the project area. With the implementation of staff's proposed COCs, impacts to these species would be reduced to less than significant and would be consistent with applicable plans, policies, and regulations. The proposed COCs include the presence of qualified biological monitors during construction activities, environmental training for all project personnel, applicable species-specific surveys, exclusionary fencing, acquisition of compensatory lands, and additional measures to avoid, minimize, and mitigate potential environmental effects. The proposed COCs also fulfill standards to fully mitigate for impacts to listed species under the California Endangered Species Act.

The proposed project would also result in impacts to drainage features that meet the jurisdictional definitions of non-wetland waters of the state under the Lahontan Regional Water Quality Control Board (LRWQCB) and are considered streambeds under CDFW regulations. Staff has proposed COCs that are consistent with conditions that are typically required in a CDFW Lake and Streambed Alteration Agreement permit and include the implementation of Best Management Practices and the acquisition of mitigation lands to offset permanent and temporary impacts to these features and to reduce impacts to less than significant.

Climate Change and Greenhouse Gas Emissions. *Less Than Significant with Mitigation Incorporated*. The project would lead to a net reduction in greenhouse gas emissions across the State's electricity system. With the implementation of staff's proposed COC, the greenhouse gas emissions related to the jurisdictional portion of the project would not conflict with any plans, policies, or regulations adopted for the purpose of reducing the emissions of greenhouse gases applicable plans, policies, and regulations. Staff's proposed COC requires the project owner to demonstrate the project would use refrigerants that comply with the California Air Resources Board Hydrofluorocarbons prohibitions in all onsite cooling/refrigeration/air conditioning units. The project would therefore have less than significant greenhouse gas-related impacts to the environment with mitigation. For the non-jurisdictional portion of the project, no diesel generators or other nonelectric equipment would be used that result in GHG emissions. The operation and maintenance activities anticipated for the downstream network upgrades are those that are already in practice and would not therefore result in an increase in GHG emissions.

Cultural and Tribal Cultural Resources. *Less than Significant with Mitigation Incorporated*. There are no recorded historical resources or tribal cultural resources that will be significantly impacted by the project. However, there is a possibility that undocumented archaeological resources might be discovered during construction and that such a discovery could be a historical resource or tribal cultural resource. With implementation of staff's proposed COCs, the proposed project's impacts on cultural and tribal cultural resources would be less than significant and would be consistent with applicable plans, policies, and regulations. The COCs require implementation of a monitoring program involving appropriately qualified specialists who would observe and manage inadvertent discoveries of historical resources during construction, train the construction workforce in basic identification of historical resources, implement stop-work procedures (if required), and report to the CEC on all activities. Additionally, the monitoring program would include California Native American tribal monitors if the consulting tribes wish to participate. No mitigation measures for non-jurisdictional project components are recommended for cultural and tribal cultural resources.

Efficiency and Energy Resources. *Less Than Significant Impact*. Energy consumed by the SMSP during construction and operation would not create significant adverse effects on energy supplies or resources, nor would it consume energy in a wasteful or inefficient manner. Furthermore, through energy-efficient design and increased renewable electricity generation, the project would neither conflict with nor obstruct state or local plan, policies, and standards for renewable energy or energy efficiency and, therefore, would have no impact on those plans.

Geology, Paleontology, and Minerals. *Less Than Significant with Mitigation Incorporated*. The impacts on, and from, potential geologic hazards would be mitigated to less than significant through appropriate methods for project design, grading, construction, and operation that are based on the results of a site-specific geotechnical investigation, consistent with the California Building Code (CBC) and other applicable plans, policies, and regulations, and comply with staff's proposed COCs. Staff's proposed COC requires the project owner to perform geotechnical and geohazard investigations and incorporate that investigation's proposed mitigation into project design, grading, and construction. Compliance with staff's proposed COC, and Facility Design COCs, and Water Resources COCs, would mitigate potential impacts the project may have on geologic hazards to less than significant. Compliance would also mitigate potential impacts from geologic hazards on the project to less than significant.

The project's ground disturbing activities would likely encounter and disturb Quaternary sedimentary deposits with a high paleontological sensitivity. Potential impacts to paleontological resources would be mitigated to less than significant through conformance with applicable plans, policies, and regulations and implementation of staff's proposed COCs. Paleontological COCs require training, monitoring, and protection of paleontological resources that may be encountered during ground disturbing activities.

No known mineral resources or unique geologic features of commercial, scientific, and recreational value occur at the project site. The project would have less than significant impacts on these resources. Most potential impacts related to construction and operation of non-jurisdictional project components at the existing Adelanto and Marketplace switchyards would be less than significant because construction would occur at existing facilities and not include ground disturbance. Construction and operation of non-jurisdictional project components should comply with the CBC and all applicable plans, policies, and regulations. During construction of non-jurisdictional project components, staff recommend compliance with Water Resources mitigation measure to mitigate potential impacts on soil erosion and topsoil loss to less than significant.

Hazards, Hazardous Materials, and Wildfire. *Less than Significant with Mitigation Incorporated*. The impacts associated with the routine transport, use, disposal or accidental release of hazardous materials/waste during construction and operation would be less than significant with the implementation of staff's proposed COCs. Impacts related to unknown environmental contamination on the project site would be less than significant with the implementation of staff's proposed COCs. Impacts related to schools and airports would be less than significant as no such facilities are within the project vicinity. The project would not impair or interfere with emergency response or evacuation planning and would have a low potential for wildfire because the solar facility and BESS are not in or near a State Responsibility Area (SRA) or lands classified as a Very High Fire Hazard Severity Zone (VHFHSZ), and implementation of staff's proposed COCs would further mitigate potential wildfire impacts to less than significant.

The COCs require the following: a Hazard Materials Business Plan (HMBP) and Spill Prevention Control and Countermeasure Plan (SPCC); advance approval for changes in hazardous materials; hazardous waste generator identification numbers; site security plans for construction and operation; a Soils Management Plan; procedures for professional staffing, management, and actions in the case of suspected contaminated soil and/or groundwater; and an air quality and water quality sampling plan in case of a container fire at the BESS.

With implementation of staff's proposed COCs, the jurisdictional project components would be consistent with applicable plans, policies, and regulations, and the project would have less than significant impacts related to hazards, hazardous materials/waste and wildfire. Additionally, the hazards, hazardous materials/waste and wildfire impacts from the construction and operation of non-jurisdictional project components, subject to permitting by the Los Angeles Board of Water and Power Commissioners, would be less than significant and no mitigation would be required.

Land Use. *Less than Significant with Mitigation Incorporated*. Rasor Road is the primary access route to the Rasor Off-Highway Vehicle (OHV) Special Recreation Management Area (SRMA), and the proposed project would utilize Rasor Road during project construction and operation. Staff assumes that public access along Rasor Road would need to be limited or closed during road improvement and realignment activities and during movement of heavy equipment. Closure of Rasor Road would effectively preclude access to the Rasor OHV SRMA, which is a designated recreational resource. With implementation of staff proposed COCs, project activities would not preclude access to the Rasor OHV SRMA, and any temporary restrictions or access delays along Rasor Road would be communicated to the public. Potential impacts to recreation access would be mitigated to less than significant.

The proposed project would only be subject to federal policies and management actions set forth in BLM's adopted resource management plans and decision documents. Potential impacts associated with BLM's land use plans and policies adopted for the purpose of mitigating an environmental effect would be less than significant, because there would be no new policy conflicts created by the project.

Noise and Vibration. *Less Than Significant with Mitigation Incorporated*. Despite the generation of noise louder than ambient levels, such as from pile driving and other construction activities, with the implementation of staff's proposed COCs, the project's construction and operation would have a less than significant impact related to noise and vibration and would be consistent with applicable plans, policies, and regulations. The COCs require a noise complaint process, restrictions on construction activities, the use of pile driving noise controls, and an occupational noise survey to verify project noise limits are met. The Noise and vibration impacts from the construction and operation of the non-jurisdictional project components would be than significant and would not require any MMs.

Public Health. *Less Than Significant with Mitigation Incorporated*. With the implementation of staff's proposed COCs to minimize personnel and public exposure to Valley fever, the project would have a less than significant impact on public health and the jurisdictional project components would be consistent with applicable plans, policies, and regulations. No MMs for non-jurisdictional project components are recommended for public health and impacts would be less than significant.

Socioeconomics. *Less Than Significant Impact with Mitigation Incorporated*. Construction and operation of the Soda Mountain Solar Project would not induce unplanned population growth in the region. The regional labor force within a practical commuting distance of the project site is adequate to meet construction labor demands, and the project would require only a minimal number of permanent operations staff, resulting in no long-term housing demand. Temporary construction workers who elect not to commute would have access to sufficient short term lodging accommodations in nearby communities, avoiding any displacement or strain on local housing resources. Accordingly, the project would result in less than significant impacts related to population growth or the displacement of people or housing.

Construction and operation of the project would also result in less than significant socioeconomic impacts on public services. Although construction activities would incrementally increase demand for fire protection, emergency medical response, law enforcement, and related public services, these effects would be minimized by implementation of staff's recommended COCs for socioeconomics; hazards and hazardous materials; transportation; and worker safety. With these COCs in place, the project would not substantially degrade service ratios, response times, or service capacities. The project would not necessitate the construction of new public service facilities or the expansion of existing ones, and it would be consistent with applicable regional plans, policies, and regulations.

The project would not require new or expanded recreational facilities and would not interfere with existing recreational uses in the surrounding region. Additionally, socioeconomic impacts associated with any necessary utility interconnections and downstream upgrades would also be less than significant with implementation of applicable mitigation for hazards, hazardous materials, wildfire risk, and worker safety.

Solid Waste Management. *Less Than Significant with Mitigation Incorporated*. Solid waste produced during project construction and operation would be recycled to the extent possible or otherwise disposed of at certified local landfills with available capacity. This would be reinforced by implementation of the construction and operational waste management plans included in staff's proposed COCs. Therefore, waste generated by the proposed project, including those sent to landfills, as well as materials handled by third party waste disposal resulting from construction and operation of the project, would have a less than significant impact and would conform with applicable plans, policies, and regulations. Additionally, impacts from network upgrades at the existing Marketplace and Adelanto substations, and utility switchyard and loop-in transmission lines, which would be under LADWP jurisdiction, would be less than significant with the inclusion of recommended MMs (operational waste management plan).

Transmission Line Safety and Nuisance. Less Than Significant with Mitigation Incorporated. With implementation of staff's proposed COCs, potential hazards and impacts to receptors associated with transmission lines and related structures and facilities for the project would have a less than significant impact related to transmission line safety and nuisance and would conform with applicable plans, policies, and regulations.

The proposed gen-tie line would be maintained according to the standard procedures of the American National Standard Institute/Institute of Electrical and Electronic Engineers guidelines for line safety and field management. The construction and operation of the project's new collector feeders, gen-tie line, on-site substation, and switchyard would not contribute to electromagnetic field (EMF) levels, corona, audible noise, or radio and television interference beyond acceptable standards. On-site worker or public exposure would be short-term and at levels expected for LADWP's lines of similar design and current-carrying capacity. Implementing grounding and other field-reducing measures in strict adherence to current utility standards and guidelines will further minimize the potential for nuisance shocks.

With staff's proposed COCs, the safety and nuisance impact from the construction and operation of the proposed substation, switchyard, collector feeders, and the gen-tie line would be less than significant. Additionally, impacts from the utility switchyard and downstream network upgrades would be reduced to less than significant since these components are subject to permitting by the Los Angeles Board of Water and Power Commissioners, which include compliance with LADWP and Federal Aviation Administration (FAA) regulations for structures 200 feet and above.

Transportation. *Less Than Significant with Mitigation Incorporated*. The project would have a less than significant impact related to transportation and with implementation of staff's proposed COCs, the project would conform with applicable plans, policies, and regulations. The COCs require: (1) the project cease all construction activities on Friday's at 1:00, with no construction on Fridays prior to a Federal Holiday, to avoid an impact to the County's Level of Service policy, (2) preparation and implementation of a Construction Management Plan to cover traffic controls, emergency access, and on-site speed limits, (3) compliance with applicable limitations on vehicle sizes, weights, driver licensing and truck routes, and (4) securing permits and licenses for transport of hazardous materials.

Visual Resources. *Significant and Unavoidable*. Project components would appear as a collection of geometric shapes and complex industrial forms that would exhibit considerable industrial character, which would contrast with the natural forms, lines, and textures of the existing desert landscape character. Travelers on I-15 and visitors to the surrounding desert recreational lands would have high viewer sensitivity to the substantial landscape changes that would occur to the project site and its surroundings. With the implementation of COCs and MMs, project impacts would be reduced but not to levels that would be less than significant. COCs would require the preparation of a: (1) construction coordination on scenic resources mitigation plan, (2) structural surface treatment, (3) vegetation management plan, (4) landscape screening Plan, (5) night lighting management plan, and (6) glint and glare mitigation and monitoring plan. Recommended MMs include (1) structural surface treatment, (2) vegetation management, and (3) night lighting management. Staff also concluded that the proposed project's degradation of the existing visual character or quality of the public views, and visibility of the proposed project would result in non-conformance with several federal and San Bernardino County visual resource management objectives, principles, or policies.

Water Resources. *Less Than Significant with Mitigation Incorporated*. Groundwater extracted from onsite wells would be the primary project water supply for both construction and operations. Although the local groundwater subbasin is unadjudicated and outside of water district jurisdiction, impact to project site aquifers would be mitigated by staff's proposed COCs and adherence to the San Bernardino County Desert Groundwater Management Ordinance (§ 33.06551). The applicant proposed to change the stormwater design to remove the previously proposed stormwater berms and associated drainage features. These revisions are incorporated as a staff proposed COC, which minimizes grading and ground disturbance by preserving existing drainage patterns and applying fluvial geomorphic stormwater design principles rather than engineered berms and channels. Impacts due to stormwater runoff would be mitigated by staff's proposed COCs both during construction and operation. Dredge and fill impacts to ephemeral streams would be mitigated by staff's proposed COCs and waste discharge requirements administrated by the LRWQCB per Clean Water Action Section 401. During project construction, sanitary wastewater needs would be addressed by portable toilets maintained by a local contractor. During project operation, the facility would be operated and monitored remotely, and no permanent sanitary facilities are planned for the project. Additionally, impacts from network upgrades at the existing Marketplace and Adelanto substations, and utility switchyard and loop-in transmission lines, under LADWP jurisdiction, would be less than significant with inclusion of staff's recommended mitigation measures, which includes measures to manage stormwater pollution prevention during operation.