# MEMORANDUM

Date: August 26, 2024

To: Cooper Kass, Angel Law

From: Andy Zdon, P.G., C.E.G., C.Hg.

Subject: **Water-supply Comments**
**Easley Solar Comments**
**Chuckwalla Valley, Riverside County, California**

Roux Associates, Inc. (Roux) is pleased to provide the following information regarding our review of the water supply evaluation for the proposed IP Easley Solar Project (Project) near Desert Center, California. This Project is as described in the Project Recirculated Draft and Final Environmental Impact Reports (DEIR and FEIR respectively, County of Riverside, 2024). The Project is a utility-scale solar photovoltaic (PV) electrical generating and storage facility, with associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid. The proposed Project application area is located on approximately 3,735 acres of private and BLM-administered land, in Riverside County north of Desert Center, California (Riverside County Planning Department, 2024).

According to the water supply assessment/impact analysis prepared by GSI Water Solutions (2024), as part of that analysis, groundwater impacts due to pumping were evaluated based on groundwater modeling, largely based on previous modeling results (e.g., Fang, et.al., 2021). Although the GSI Water report uses the tools that are recommended in the Best Management Practices associated with the Desert Renewable Energy Conservation Plan, the report fails to provide a robust discussion of model development, calibration, sensitivity analyses, and limitations. Due to the absence of key foundational information in the prior modeling documentation which serves as a basis for the Project impact analysis, there are substantial information/data gaps that must be addressed for the drawdown and water budget estimations to be considered reliable. Additionally, aspects of the basin conceptual model (e.g., groundwater recharge) are unrealistic as noted below and affect the reliability of the impact analysis.

The comments below are of a more foundational and conceptual nature. As such, a more granular review of specific assumptions, estimates and impacts was not conducted as the items described below are foundational and should be revisited. Those aspects would likely change after addressing the issues described below.

**Groundwater Recharge**

A key aspect of the water supply assessment is the estimate of groundwater recharge. That parameter should substantially affect model results. Tables 4 and 5 in the water supply assessment (GSI Water, 2024) present a range of groundwater recharge estimates (4,997 to 8,846 acre-feet per year (afy)). These recharge estimates appear to be substantially high. The U.S. Geological Survey (Devine, 2000) in their review of Fenner Valley watershed conditions (approximately 50 miles northeast at higher, wetter elevations with lower evaporation rates) indicated that little, if any, groundwater recharge would occur at elevations below 4,000 feet above mean sea level (ft msl). Nearly all of Chuckwalla Valley falls below that elevation.

Precipitation at Blythe east of Chuckwalla Valley is less than 4 inches per year. Similarly, precipitation at the Eagle Mountain station (within Chuckwalla Valley, record from 1933 to 2016) was also less than 4 inches per year. In their studies of Borrego Valley to the south of Chuckwalla Valley, the U.S. Geological Survey similarly noted (Faunt, et.al., 2015) that:



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> "*Because the average precipitation rate is 5.83 in/yr. (Western Region Climate Center, http://www.wrcc.dri.edu/ cgi-bin/cliMAIN.pl?ca0983 accessed September 29, 2015), the PET (potential evapotranspiration) rate is 71.6 in/yr (California Irrigation Management System, 2012), and soil moisture requirements by plants near the root zone are high, recharge from direct infiltration of precipitation is considered negligible."*

Based on these U.S. Geological Survey investigations in differing regions south and north of Chuckwalla Valley, and the precipitation records in the Chuckwalla Valley, the potential groundwater recharge is likely substantially less than used in the water supply assessment and as a basis for the DEIR and the FEIR.

The influence of this overestimation of recharge in relation to the Project water supply assessment is likely substantial. This would affect both the original calibration of the modeling, associated aquifer parameters, and the underflow estimates. Additionally, the extent of drawdown and reductions of other groundwater budget parameters (e.g., reduction of underflow toward groundwater basins between Chuckwalla Valley and the Colorado River) would also be affected.

**Groundwater Modeling**

The modeling report by Fang is presented in the form of a journal article. It is unclear to Roux whether the article is in its final form or remains in draft form. This is because the versions of the documents that Roux was able to access online (via the "escholarship.org" link provided in the FEIR) remained in typical draft form for a journal article (e.g., double-spacing, line numbering, etc., for editing purposes). If it remains in draft form, relying on a draft product would be problematic. Further, several editorial and/or typographical errors in the text make it unclear as to whether a peer review was conducted on the paper.

Assuming that the model is a final product, the numerically intensive manner of the approach combined with the general lack of measured soil/aquifer hydraulic parameters for the Chuckwalla Valley aquifer system indicates that substantial uncertainty is likely to accompany the results of the analysis. On top of that substantial uncertainty, given the format of the Fang report and likely size limitations for an article, key aspects of a standard modeling report are not included. These include a sensitivity analysis of the parameters used, uncertainties and/or quality assurance/quality control of modeling, and limitations of the use of the model.

These same issues carry on in the water supply assessment (GSI Water, 2024). For example, the model development is only described in a cursory manner while calibration, sensitivity analyses, and modeling limitations are not presented. These are standard sections in groundwater modeling reports as described the U.S. Geological Survey (Riley and Harbaugh, 2004), and standard modeling texts (e.g., Anderson & Woessner, 1992). A copy of the USGS guidelines are attached. Absent these report aspects which are standard sections of a modeling report (which the water supply assessment clearly is), assessing the reliability of the modeling tool used to assess Project impacts is not possible.

**Closing**

Given the absence of foundational information related to the water supply assessment and the excessive estimation of groundwater recharge for Chuckwalla (and the corresponding implications of these deficiencies on the reliability of the Project impact analysis) we are unable to provide further substantive review to assess the proposed water-supply for the Project. Similarly, county decision-makers cannot make a fully informed decision as to whether the Project would substantially decrease groundwater supplies such that the Project (or cumulative projects) may impede sustainable groundwater management of the basin (Impact HWQ-2).

We recommend that the water supply assessment be revisited to address these issues. Further, we believe that a review of the underlying modeling (Fang, et.al., 2021) be performed by an independent research group such as the U.S. Geological Survey. If these modeling tools are going to be relied upon for land management decision-making, the high-degree of uncertainty, and potential unreliability leads to

substantial risk in decision-making that would not only affect Chuckwalla Valley, but downgradient basins as well.

We appreciate the opportunity to comment on the Project environmental review. Should you need further assistance, please contact Andy Zdon at (925) 640-7807, or by email azdon@rouxinc.com.

**References**

Anderson, Mary P., and William Woessner, 1992. Applied Groundwater Modeling: Simulation of Flow and Transport. Academic Press, San Diego. 381p.

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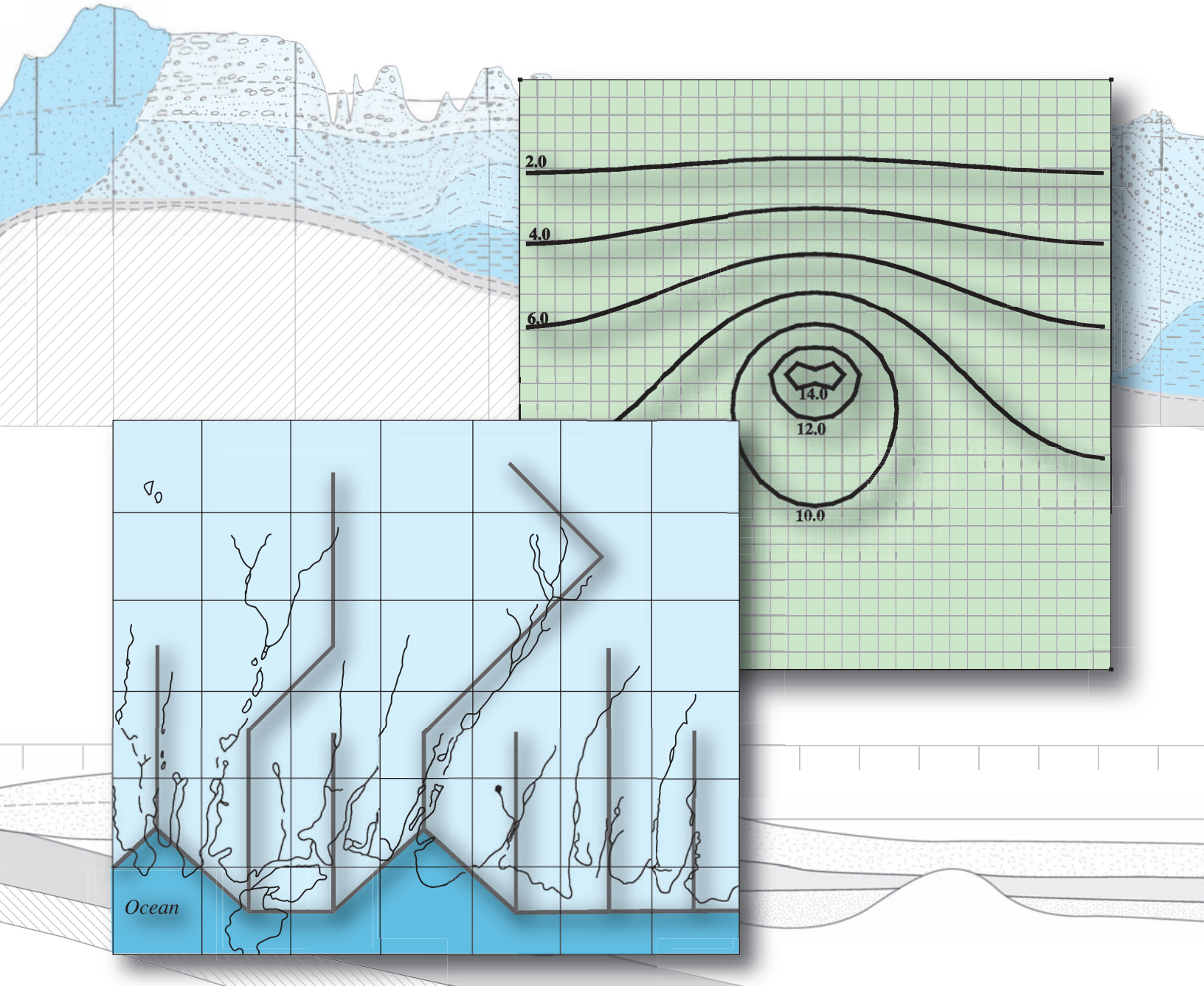
# Guidelines for Evaluating Ground-Water Flow Models

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# Guidelines for Evaluating Ground-Water Flow Models

By Thomas E. Reilly and Arlen W. Harbaugh

Scientific Investigations Report 2004-5038

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*Suggested citation:*
Reilly, T.E., and Harbaugh, A.W., 2004, Guidelines for evaluating ground-water flow models: U.S. Geological Survey Scientific Investigations Report 2004-5038, 30 p.

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# Conversion Factors

| Multiply | By | To obtain |
|---|---|---|
| foot (ft) | 0.3048 | meter (m) |
| mile (mi) | 1.609 | kilometer (km) |
| square mile ($mi^2$) | 2.590 | square kilometer ($km^2$) |
| cubic foot per second ($ft^3/s$) | 0.02832 | cubic meter per second ($m^3/s$) |

English units are used in all original work presented in this report. Figures and results from published studies are also presented throughout this report. The system of units that were originally used in these previously published studies are retained in this report in order not to introduce any errors and to show the level of approximation used in the investigator's estimates.

# Guidelines for Evaluating Ground-Water Flow Models

By Thomas E. Reilly and Arlen W. Harbaugh

## Abstract

Ground-water flow modeling is an important tool frequently used in studies of ground-water systems. Reviewers and users of these studies have a need to evaluate the accuracy or reasonableness of the ground-water flow model. This report provides some guidelines and discussion on how to evaluate complex ground-water flow models used in the investigation of ground-water systems. A consistent thread throughout these guidelines is that the objectives of the study must be specified to allow the adequacy of the model to be evaluated.

## Introduction

The simulation of ground-water flow systems using computer models is standard practice in the field of hydrology. Models are used for a variety of purposes that include education, hydrologic investigation, water management, and legal determination of responsibility. In the most general terms, a model is a simplified representation of the appearance or operation of a real object or system. Ground-water flow models represent the operation of a real ground-water system with mathematical equations solved by a computer program. A difficulty that faces all individuals attempting to use the results of a model is the development of an understanding of the strengths and limitations of a model analysis without having to reproduce the entire analysis.

The primary purpose of this report is to help users of reports that document ground-water flow models evaluate the adequacy or appropriateness of a model. A secondary purpose for this report is to provide for model developers a guide to the information that should be included in model documentation. The information in this report is mainly qualitative. It reflects the views developed by the authors on the basis of over 50 years combined experience with ground-water modeling. The authors have used models, reviewed modeling studies and reports, provided modeling advice, taught modeling courses, and developed computer model programs.

It is important to distinguish among three terms we use to discuss the modeling process: conceptual model, computer model program, and model. A "conceptual model" is the hydrologist's concept of a ground-water system. A "computer model program" is a computer program that solves ground-water equations. Computer model programs are general purpose in that they can be used to simulate a variety of specific systems by varying input data. A "model" is the application of a computer model program to simulate a specific system. Thus, a model incorporates the model program and all of the input data required to represent a ground-water system. The modeler attempts to incorporate what he or she believes to be the most important aspects of the conceptual model into a model so that the model will provide useful information about the system.

The information provided in this report is generally relevant to all types of ground-water flow model programs; however, the examples cited throughout the report use the model program MODFLOW (Harbaugh and others, 2000).

This report reviews the important aspects of simulating a ground-water flow system using a computer model program and explains the ramifications of various design decisions. An important part of the information necessary for evaluating a model is the intended use of a model, because it is impossible to develop a model that will fulfill all purposes. Further, the intended use must be specific as opposed to general. For example, saying that a model will be used to evaluate water-management alternatives is inadequate. Specific information about the alternatives to be considered also would be necessary. Thus, a consistent thread throughout this report is the need to consider the purpose of a model when evaluating the appropriateness of the model.

## Appropriateness of the Computer Model Program

Many computer model programs are available for simulating ground-water systems. Each computer model program can be characterized by the mathematical method used to represent ground-water equations (Konikow and Reilly, 1999), assumptions, and the range of simulation capabilities. For example, the mathematical method in MODFLOW is finite difference in space and time, with backward difference for time. Major

assumptions are (1) confined three-dimensional flow with water-table approximations, and (2) principal directions of hydraulic conductivity are aligned with the coordinate axes. A variety of hydrologic capabilities are included, for example, the simulation of wells, rivers, recharge, and ground-water evapotranspiration. There also are simple analytical models that assume homogeneous conditions for one or two dimensions that can be used to solve some problems. The tool or computer model program used can be as simple or as complex as required for the problem, but the method, assumptions, and capabilities must be evaluated to assure that the tool is appropriate and can provide scientifically defensible results.

Questions to be answered in the evaluation of the appropriateness of the modeling program are:

1. Are the objectives of the study clearly stated?
2. Is the mathematical method used in the computer model program appropriate to address the problem?
3. Does the numerical or analytical model selected for use simulate the important physical processes needed to adequately represent the system?

# Different Modeling Approaches to Address a Problem

A general-purpose computer model program such as MODFLOW can be used in many ways to address a problem as illustrated in table 1. Approaches to a problem that are commonly used are: calibrated model, hypothetical system model, sensitivity analysis, superposition, and particle tracking. Frequently, several approaches are combined to address a problem.

## A Calibrated Model

A model that is "calibrated" is required to address many hydrologic problems. Model calibration in its most limited meaning is the modification of model input data for the purpose of making the model more closely match observed heads and flows. Adjustment of parameters can be done manually or automatically by using nonlinear regression statistical techniques. In the broader meaning of model calibration, parameter adjustment is only one aspect of model calibration. Key aspects of the model, such as the conceptualization of the flow system, that influence the capability of the model to meet the problem objectives also are evaluated and adjusted as needed during calibration. For example, it may be noticed that some of the parameters that result in the best match to observations are not reasonable based on other knowledge of their values. This may indicate that there is a conceptualization problem with the model. Thus, the closeness of fit between the simulated and observed conditions, and the extent to which important aspects of the simulation are incorporated in the model are both important in evaluating how well a model is calibrated. In practice, calibration is conducted differently by each investigator; some examples that discuss calibrated models are Luckey and others (1986), Buxton and Smolensky (1999), and Anderson and Woessner (1992, section 8.3 and 8.4).

The amount of effort that is required in calibrating a ground-water flow model is dependent upon the intended use of the model (that is, the objective of the investigation). Most models of specific ground-water systems that are used to estimate aquifer properties, understand the past, understand the present, or to forecast the future are calibrated by matching observed heads and flows. Determining if the calibration is sufficient for the intended use of the model is very important in evaluating whether the model has been constructed appropriately. (See later section for more on evaluating the adequacy of model calibration.)

## A Hypothetical Model

A hypothetical model is a model of an idealized or representative system as opposed to a model of a specific system. In an attempt to understand the basic operation of a ground-water system, the determination of whether to develop a model of a hypothetical idealized system or a model of an actual system greatly affects the amount of data needed to construct the model. Hypothetical models are not calibrated, but input data are frequently adjusted during model development to make the model fit the idealized system or to test how the model responds. The utility of hypothetical models is that the system can be defined exactly and the cause and effect processes under investigation can be clearly identified with minimal cost. The input data needed to define the hypothetical system can be as simple or as complex as required to investigate the processes of interest. No effort is required to collect and interpret data from an actual ground-water system and no uncertainty exists in the ability of the model to represent the system, which results in substantial cost savings compared to making a model of a specific system. Hypothetical models have been used to examine various processes that affect or are affected by ground-water flow, for example: boundary conditions (Franke and Reilly, 1987), contributing areas to wells (Morrissey, 1989; Reilly and Pollock, 1993), and model calibration (Hill and others, 1998).

## Sensitivity Analysis

Sensitivity analysis is the evaluation of model input parameters to see how much they affect model outputs, which are heads and flows. The relative effect of the parameters helps to provide fundamental understanding of the simulated system. Sensitivity analysis also is inherently part of model calibration. The most sensitive parameters will be the most important parameters for causing the model to match observed values. For example, an area in which the model is insensitive to hydraulic conductivity generally indicates an area where there is relatively little water flowing. If the model is being calibrated, then changing the value of hydraulic conductivity in this area will

**Table 1.** Types of problems that may initiate a hydrologic study involving a ground-water flow model.

| Problem Type | Reason for Undertaking Study | Approach to Model the Problem |
|---|---|---|
| Basic Understanding of Ground-Water System | Investigation of hydrologic processes | • Hypothetical system model<br>• Superposition<br>• Particle Tracking |
| | Determination of effective data collection network | • Calibrated model<br>• Hypothetical system model<br>• Superposition<br>• Sensitivity analysis |
| | Preliminary model to determine current level of understanding | • Calibrated model<br>• Hypothetical system model<br>• Superposition<br>• Sensitivity analysis |
| Estimation of Aquifer Properties | Aquifer test analysis | • Calibrated model<br>• Superposition |
| | Determination of aquifer properties | • Calibrated model |
| Understanding the Past | Understanding historical development of an aquifer system | • Calibrated model |
| | Estimation of predevelopment conditions | • Calibrated model |
| Understanding the Present | Determination of the effect of ground-water pumpage on surface-water bodies | • Calibrated model<br>• Superposition<br>• Particle Tracking |
| | Determination of sources of water to wells | • Calibrated model<br>• Particle Tracking |
| | Determination of responsible parties causing impacts on the system | • Calibrated model<br>• Particle Tracking |
| Forecasting the Future | Management of a system | • Calibrated model<br>• Superposition<br>• Particle Tracking |

not help much in causing the model to match observations. The calibration will not provide much certainty about the value of the parameter, but the uncertainty will not matter provided the model is not used in situations where large amounts of water will flow in that area. Such a model, however, would probably not be suitable for evaluation of recharge or withdrawal in this area because the amount of flow in the area would be much greater than it was when the model was calibrated, and the uncertainty from the calibration would be unacceptable. Anderson and Woessner (1992, p. 246-257) provide some examples of sensitivity analyses.

Sensitivity analysis can be conducted manually or automatically. In the manual approach, multiple model simulations are made in which ideally a single parameter is adjusted by an arbitrary amount. The changes to the model output for all of the parameter changes may be displayed in tables or graphs for evaluation. The automatic approach directly computes parameter sensitivity, which is the change in head or flow divided by the change in a parameter. Automatic sensitivity analysis is inherently part of automatic parameter adjustment for model calibration. The automatic parameter adjustment algorithm uses parameter sensitivity to compute the parameter values that cause the model to best match observed heads and flows.

## Superposition

Superposition (Reilly and others, 1987) is a modeling approach that is useful in saving time and effort and eliminating uncertainty in some model evaluations. Models that are designed to use superposition evaluate only changes in stress and changes in responses. Most aquifer tests that analyze drawdown use superposition. Only the change in heads (the drawdown) and change in flows are analyzed, which assumes the response of the system is only due to the stress imposed and is not due to other processes in the system. The absolute value of the head and a quantification of the actual regional flows are not needed. In the past, superposition was frequently used with analog model analysis of ground-water systems because electrical simulation of areal stresses and boundary conditions was extremely difficult. As modern numerical computer models made simulation of all stress conditions easier, superposition was used less frequently in areal models. If the problem to be solved involves only the evaluation of a change due to some change in stress, however, the application of superposition can greatly simplify the data needs for model development. Superposition is strictly applicable to linear problems only, that is, constant saturated thickness and linear boundary conditions. If the system is relatively linear, however, for example the saturated thickness does not change by a significant portion (no absolute guidance can be given, but some investigators have used a 10 percent change in thickness as a rule of thumb), superposition can still provide reasonably accurate answers. Currently, superposition is used primarily in the simulation of aquifer tests, in that only changes due to the imposed change in stress (that is, the well discharge) are simulated and zero drawdowns are specified as the initial and boundary conditions; example simulations are presented in Prince and Schneider (1989) and McAda (2001).

## Particle Tracking

Particle tracking (Pollock, 1989) is the determination of the path a particle will take through a three-dimensional ground-water flow system. The determination of the paths of water in the flow system aids in conceptualizing and quantifying the sources of water in a modeled system. For example, Buxton and others (1991) used particle-tracking analysis to determine recharge areas on Long Island, New York, and Modica and others (1997) made use of particle tracking in the context of a ground-water flow model to understand the patterns and age distribution of ground-water flow to streams of the Atlantic Coastal Plain. Although particle tracking is useful in determining advective transport, this report does not address the use of models to determine transport of chemicals, but rather refers to the approach of using particle tracking to understand the flow system.

## Spatial and Temporal Approaches

In addition to the overall modeling approaches discussed above, many model programs can be used in one, two, or three dimensions, and they can be applied as transient or steady state. The simplification of the model domain to one or two dimensions, either in plan view or cross section, is used to minimize the cost of constructing a model. The simplification of the system to one or two dimensions, however, must be consistent with the flow field under investigation and consistent with the objectives of the study. Consistent with the flow field, means that there is no or negligible flow orthogonal to the line or plane of the one- or two-dimensional system being simulated.

Steady-state models are used widely, although true steady-state conditions do not exist in natural systems. All natural systems fluctuate in response to climatic variations that can be seasonal, annual, decadal or longer. In steady-state models, an assumption is made that a system can be represented by a state of dynamic equilibrium or an approximate equilibrium condition. If the objectives of the investigation do not require information on the time it takes for a system to respond to new stresses or the response of the system between periods of relative equilibrium, then simulation of the system as a steady-state system may be a reasonable approach. However, if the system is not at a period of equilibrium or approximate equilibrium during the periods of interest, then a transient analysis is required.

Questions to be answered in the evaluation of the appropriateness of the modeling approach to analyze the problem are:

1. Is the overall approach (calibrated model, hypothetical system model, sensitivity analysis, superposition, and particle tracking) for using simulation in addressing the objectives clearly stated and appropriate?
2. If the analysis is not three dimensional, is the representation of the system using one or two dimensions appropriate to meet the objectives of the study and justified in the report?
3. If the model is steady state, is adequate information provided to justify that the system is reasonably close to a steady-state condition?

Models of ground-water systems may be very different in their level of complexity. Whether the model design and approach are appropriate for the problem being investigated must be evaluated. This evaluation requires a clear statement of the problem to be investigated and the modeling approach. A further requirement is an understanding of the model design. The remainder of this report focuses on specific aspects of model design that should be examined in determining the worth of a particular model. These aspects are: discretization and representation of the hydrogeologic framework, boundary conditions, initial conditions, accuracy of the numerical solution, and accuracy of calibration for the intended use of the model.

# Discretization and Representation of the Hydrogeologic Framework

A fundamental aspect of numerical models is the representation of the real world by discrete volumes of material. The volumes are called cells in the finite-difference method, and the volumes are called elements in the finite-element method. The accuracy of the model is limited by the size of the discrete volumes. Further, for transient models, time is represented by discrete increments of time called time steps in most model programs. The size of the time steps also has an impact on the accuracy of a model. The issue of the size of the discrete volumes and time steps is discussed for the finite-difference method.

## Cell Size

The size of cells determines the extent to which hydraulic properties and stresses can vary throughout the modeled region. Hydraulic properties and stresses are specified for each cell, so the more cells in a model, the greater the ability to vary hydraulic properties and stresses. If the cell size is too large, important features of the framework may be left out or poorly represented. Accordingly, it is important to evaluate the known (or assumed) variation of hydraulic properties and stresses of the system being simulated compared to the size of the cells. For example, the differences in the representation of a confining unit in a regional ground-water flow model and a sub-regional model of Long Island, New York (Buxton and Reilly, 1987) are substantial (fig. 1), and the locations where the clay is absent is much better represented at the finer scale. In a parallel sense, the representation of the streams and shoreline are different depending on the scale (fig. 2). The intended use of the model and the importance of the features being discretized affect both the evaluation of whether the model is discretized appropriately and whether important features are missing that would cause a systematic error or bias in the simulation results.

Figure 3 shows the difference in simulated drawdown when different cell sizes are used to simulate pumping from two wells in a one-layer model. The 3,300 ft by 3,300 ft system is confined with a uniform transmissivity of 10,000 $ft^2/d$. No-flow boundaries surround all sides except the northern boundary, which has a specified head of 0 ft. The wells are 200 ft apart, and each is pumped at a constant rate of 100,000 $ft^3/d$. Figure 3A shows drawdown with a grid spacing of 300 ft. With this grid spacing, the two wells are located in a single cell, so the model "sees" the two wells as a single well pumping at 200,000 $ft^3/d$. Figure 3B shows the same system using a 100-ft grid spacing; this spacing allows each well to be represented separately. Both grids result in nearly identical drawdown for distances greater than 500 ft from the wells, but the drawdown is quite different close to the well.

Continuity of geologic deposits can be disrupted when cells are too large; for example, isolated cells, unintended holes

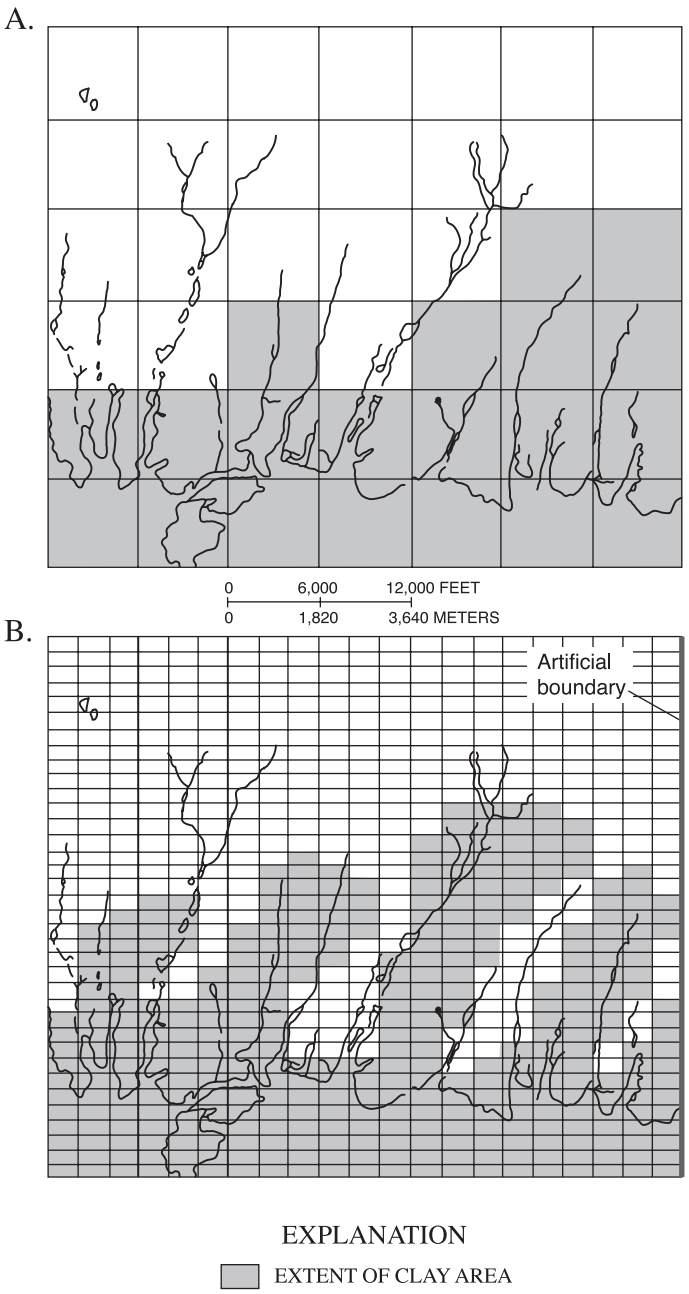


**Figure 1.** Extent of the south-shore confining unit on Long Island, New York, (A) as represented in a regional ground-water flow model grid, and (B) as represented in a sub-regional ground-water flow model grid. (Modified from Buxton and Reilly, 1987.)

in confining units, and breaks in channels with high conductivity can occur. An example of this is shown in figure 4 where a high hydraulic-conductivity channel becomes discontinuous when discretized with finite-difference cells that are too large to accurately define the important feature of the framework. The effect of the high hydraulic-conductivity channel is not adequately represented in a model with this discretization because it is not represented as a channel but rather as a set of discontinuous pockets of high hydraulic conductivity.

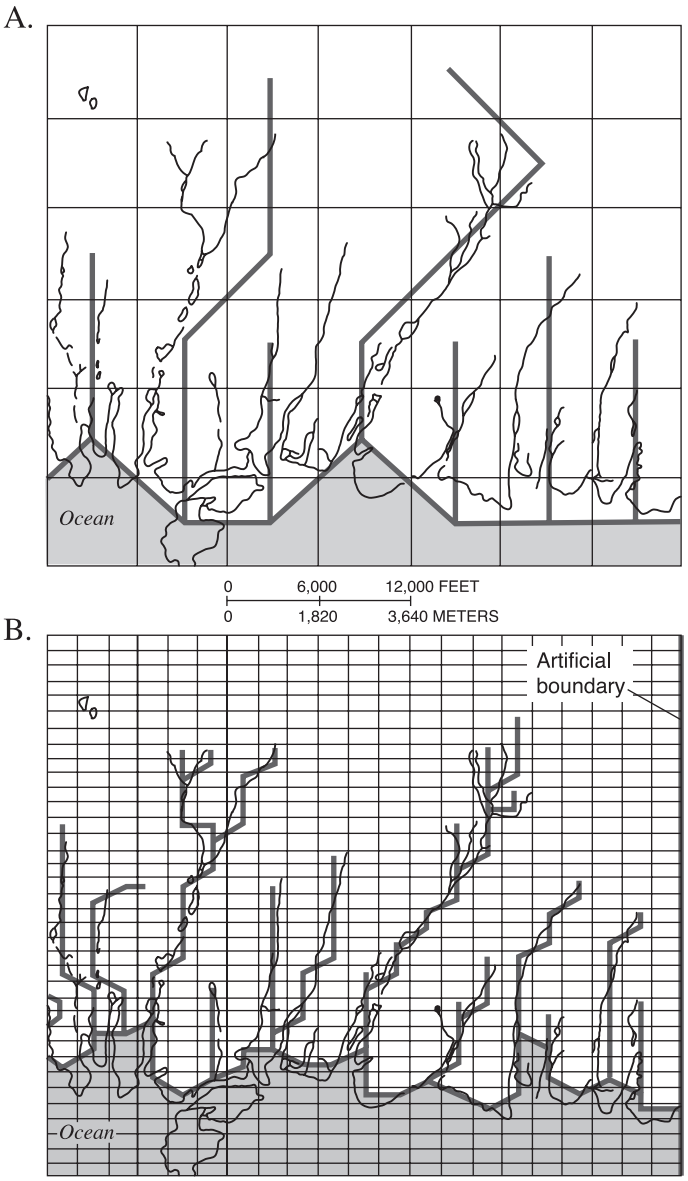


**Figure 2.** Representation of stream and shoreline boundaries on Long Island, New York, (A) as represented in a regional ground-water flow model grid, and (B) as represented in a sub-regional ground-water flow model grid. (Modified from Buxton and Reilly, 1987.)

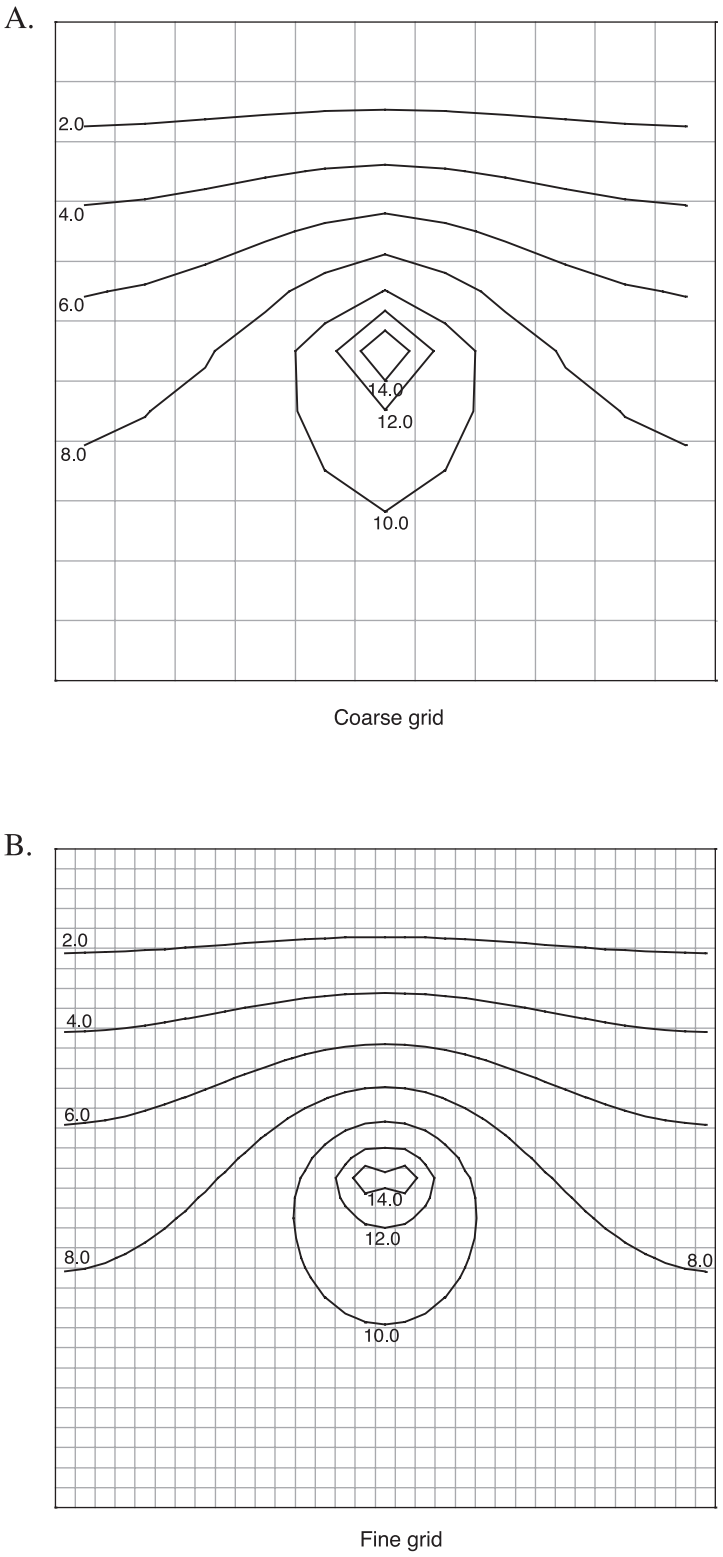


**Figure 3.** Simulated drawdown from two wells using different grid spacings.

Further, selecting a cell size that is just adequate to represent the variation of hydraulic properties and stresses generally is inadequate. A change in a property or stress in a system has an effect on the computed head some distance away. A complex distribution of hydraulic properties and stresses results in a complex head distribution. Many cells are needed to simulate a complex head distribution because the finite-difference method computes a single value of head for each cell. Many single values are required to approximate a complex distribution. Thus, it is important to incorporate a sufficient number of cells to allow the complexity of head distribution to be simulated. A simple example is shown in figure 5. A system is simulated with two different grid spacings, as described for figure 3, except that a single well pumping 200,000 $ft^3/d$ is being simulated. The figure shows a cross section of head along the row containing the well. The head distribution is most complex near the well, and

accordingly, there is noticeable difference in drawdown for the two grid spacings near the well. If accuracy of head near the well is not important to the problem, then the coarse grid is probably acceptable. But, if accuracy is needed near the well, then the finer grid would be necessary.

Some of the examples in this report have used uniform horizontal grid spacing; however, finite-difference models generally allow the widths of rows and columns to vary, which is called variable grid spacing. The use of variable grid spacing allows some flexibility to make cells smaller in some areas and coarser in other areas. Another approach to allowing cell sizes to vary, called telescopic refinement, is to couple a finer grid model to a subregion of a coarser grid model. This approach can avoid having the elongated cells, which are characteristic of using variable grid spacing. An approach for implementing telescopic refinement with MODFLOW is documented in Leake and Claar (1999).

In the vertical direction, two approaches commonly are used to represent the hydrogeologic framework in the model—uniform model layers (a rectilinear grid) and deformed model layers (fig. 6). Deformed model layers allow horizontal

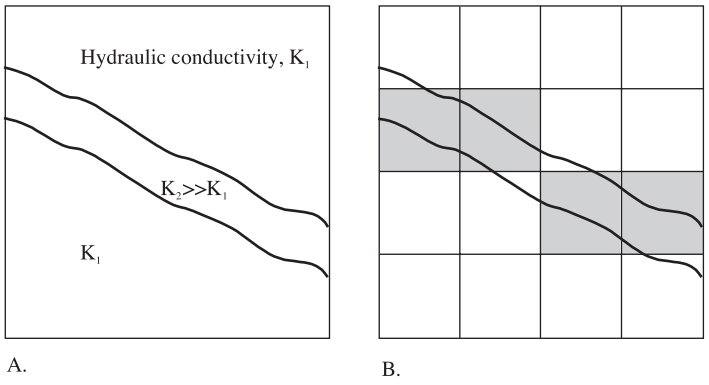


**Figure 4.** Large finite-difference cells may be inadequate to represent some important features of a ground-water system. (A) Map of the distribution of horizontal hydraulic conductivity showing a channel of high hydraulic conductivity. (B) Finite-difference cells representing the high hydraulic-conductivity channel are no longer continuous, because there is no direct connection between diagonal cells in the finite-difference method.

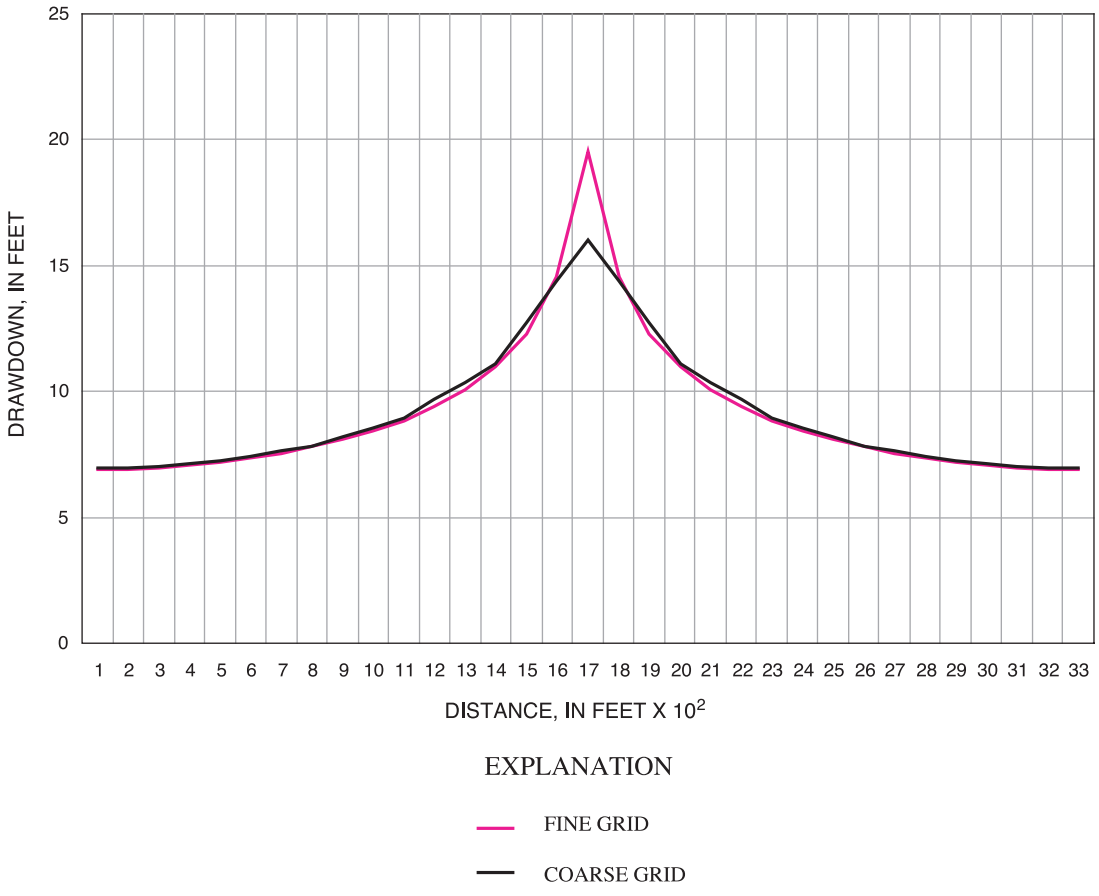


**Figure 5.** Cross section of drawdown showing the effect of grid spacing.

continuity to be maintained with fewer cells at the expense of introducing some error in the finite-difference method. As examples, the discretization of the geologic framework into uniform model layers was used in the simulation of ground-water flow on Cape Cod, Massachusetts as shown in figure 7 (modified from Masterson and others, 1997), and the discretization of the geologic framework by deformed or hydrogeologic model layers was used in the simulation of ground-water flow on Long Island, New York as shown in figure 8 (modified from Buxton and others, 1999).

A two-dimensional (single-layer) model and a three-dimensional (eight-layer) model of Cape Cod, Massachusetts, provide an example of the effect of vertical discretization on model results. The number of layers used to discretize the aquifer affects the resultant flow field and estimation of the area contributing recharge to pumping wells. The ground-water flow system in the example consists of a thick (250–500 ft) multilayered sequence of unconsolidated deposits or materials that range in grain size from gravel and sand to silt and clay and includes numerous overlying ponds and streams and variable

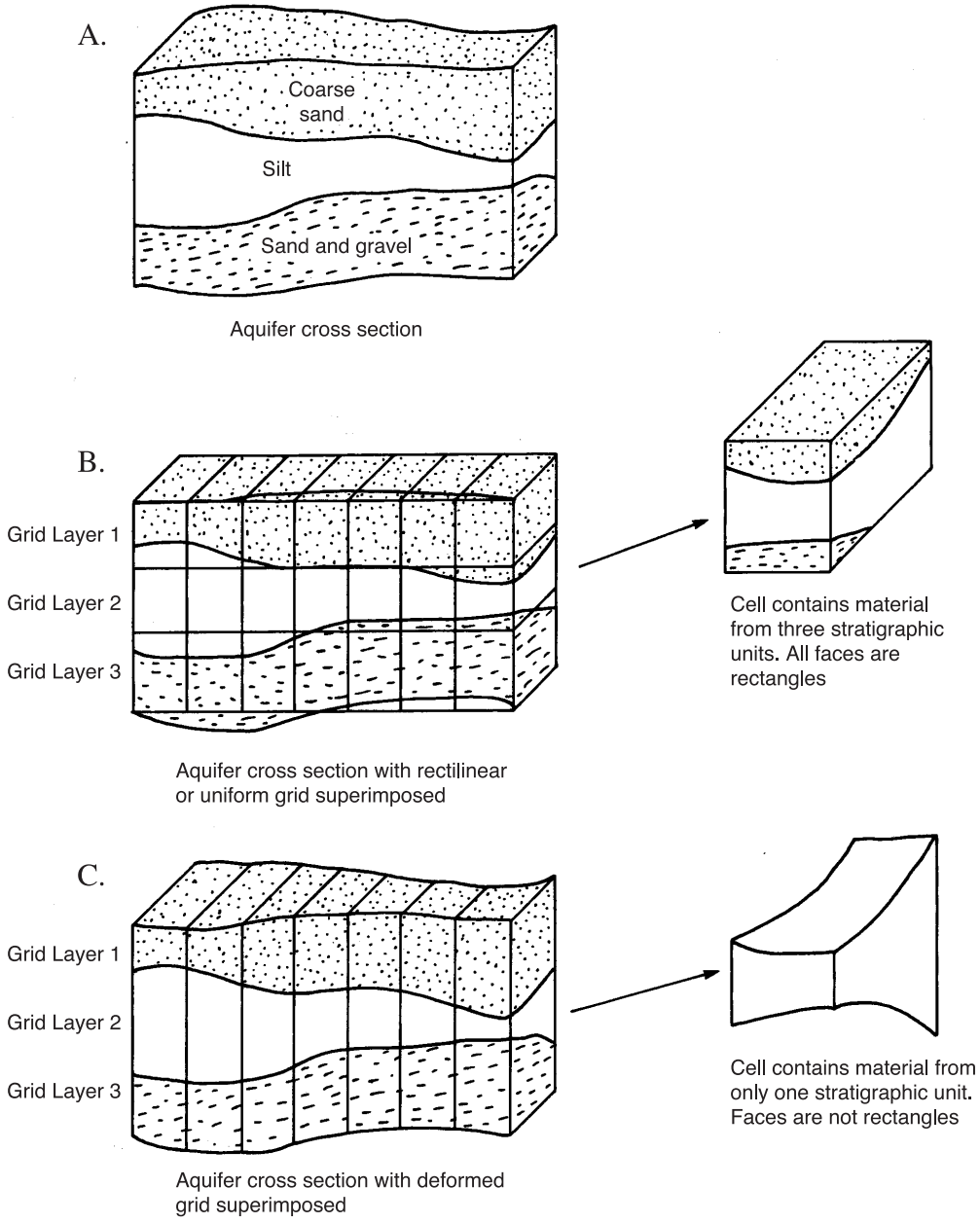


**Figure 6.** Schemes of vertical discretization for (A) aquifer cross section, (B) aquifer cross section with rectilinear or uniform grid superimposed, and (C) aquifer cross section with deformed grid superimposed.

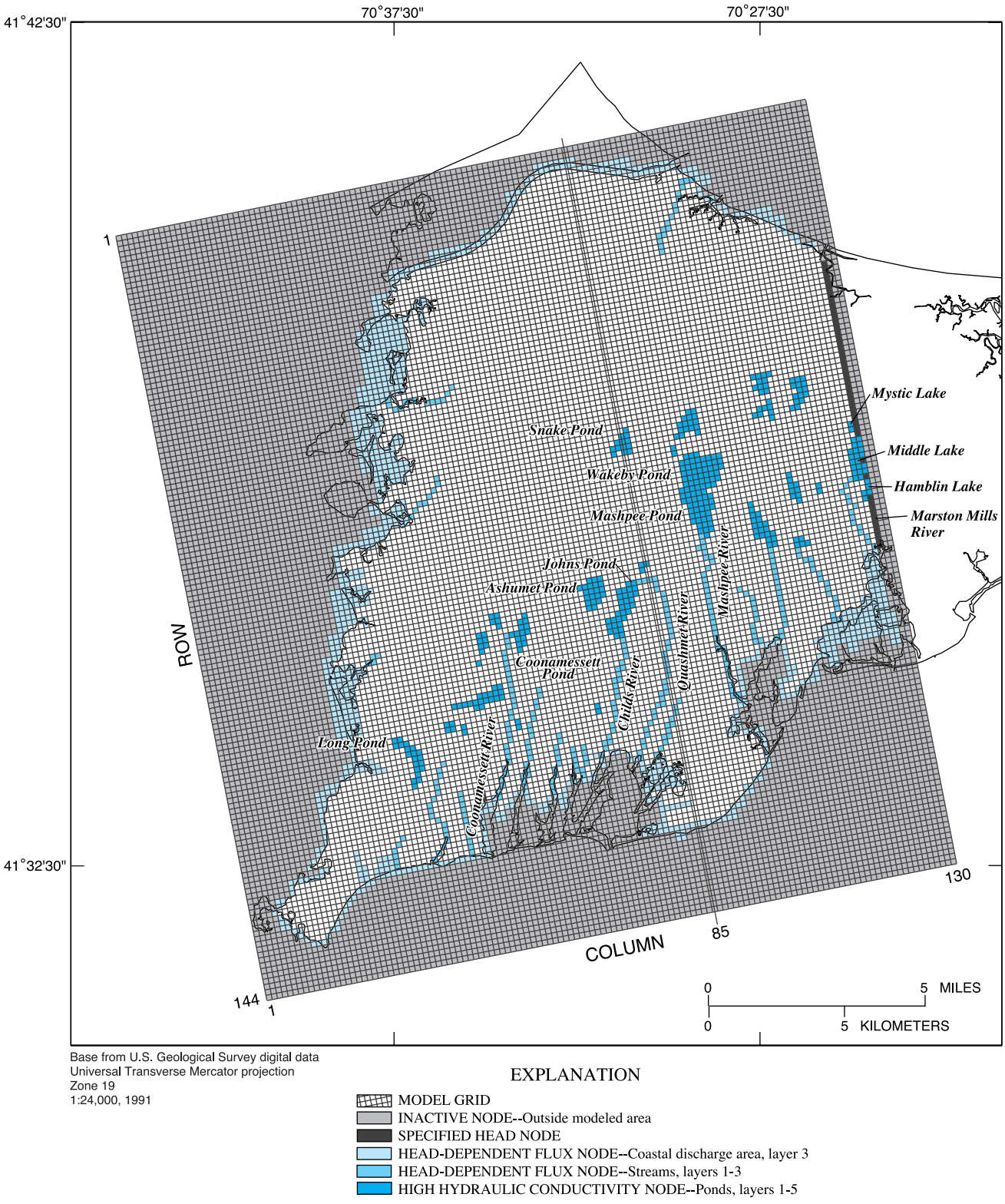


**Figure 7A.** Horizontal and vertical discretization using uniform layers for the model simulating ground-water flow on Cape Cod, Massachussetts. Horizontal grid. (Modified from Masterson and others, 1997.)

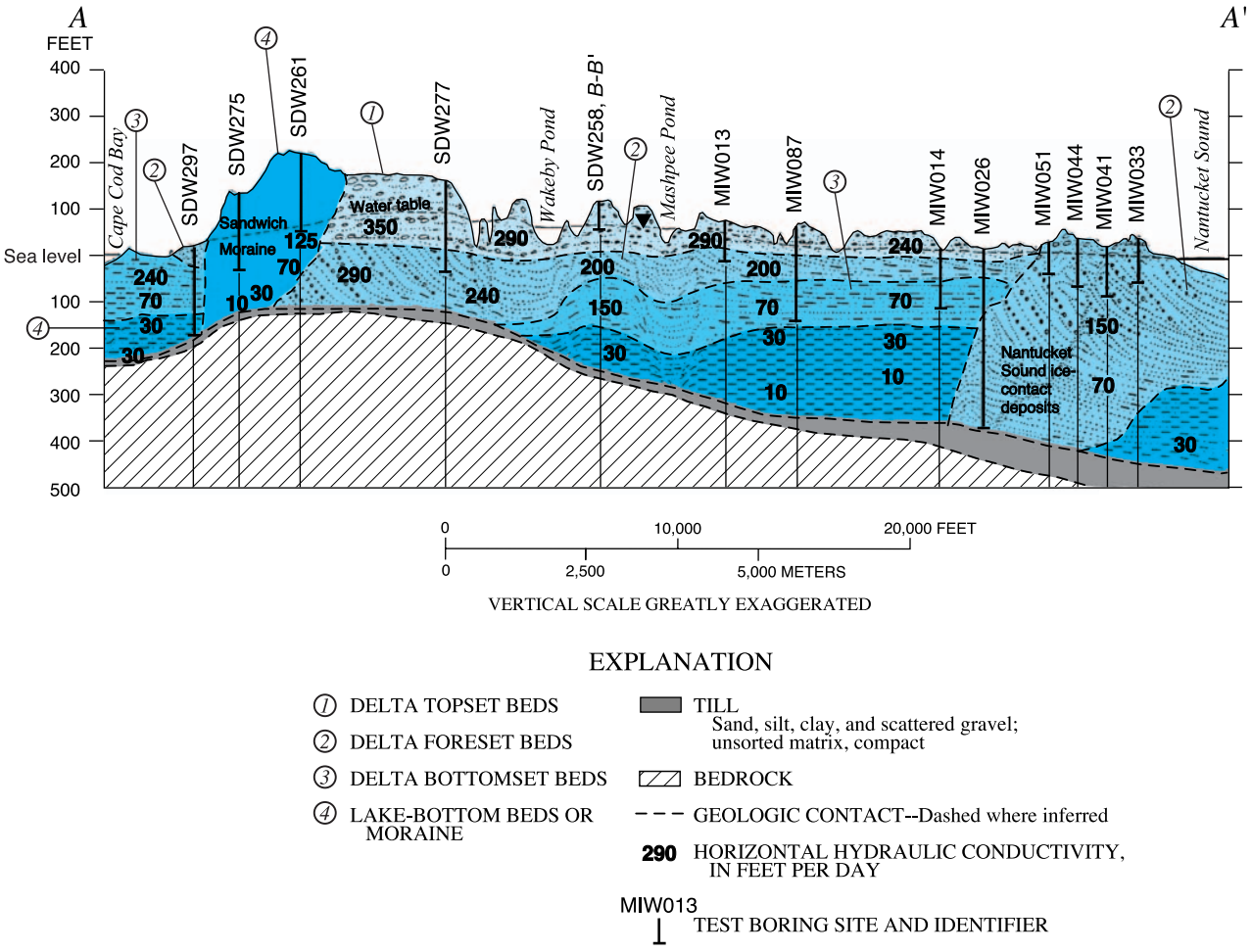


**Figure 7B.** Horizontal and vertical discretization using uniform layers for the model simulating ground-water flow on Cape Cod, Massachussetts. Hydrogeologic cross section near column 85. (Modified from Masterson and others, 1997.)

recharge rates from precipitation. More than 30 public-supply wells, screened at various depths, withdraw water from the system at widely differing rates. The three-dimensional model was developed first and then simplified into a two-dimensional model that was calibrated independently; consequently, the total transmissivities of the two models are not identical. The contributing recharge areas for the two-dimensional model and three-dimensional model (fig. 9) are different, however, even though both models represent the flow field on Cape Cod, Massachusetts. In the two-dimensional model (fig. 9A), the contributing areas are fairly typical of the simple ellipsoidal shapes that are delineated by two-dimensional analytical and numerical modeling techniques. In comparison, however, the shapes of the contributing recharge areas using the multilayer three-dimensional model (fig. 9B) are more complex (Barlow, 1994; Franke and others, 1998).

In evaluating a ground-water flow simulation, the proper or sufficient discretization is not straightforward to determine. Enough detail is required to represent the hydraulic properties, stresses, and complexities of the flow field for the objectives of the study; yet, the cost will be less if the model is kept as simple as possible so that data entry, computer resources, and analysis of model output are as minimal as possible. Thus, the determination of the proper discretization is always a compromise. Ideally, the modeler would test the effect of grid spacing on a model to help determine the optimal grid spacing; however, the authors have not seen this done with any frequency. The model documentation should justify the discretization that is used.

## Specifying Properties of Cells

A second aspect of representing the hydrogeologic framework is the choice of the hydraulic properties assigned to the cells. When simulating an actual system (as opposed to a hypothetical system), the properties of a system are generally not known at every cell in the grid; therefore, interpolation from limited real-world data must be done. Given the uncertainty of knowledge of the distribution of hydraulic properties, groups of cells are sometimes given a uniform value rather than attempting to define an individual value for every cell. Interpolation schemes, such as distance weighting and various geostatistical

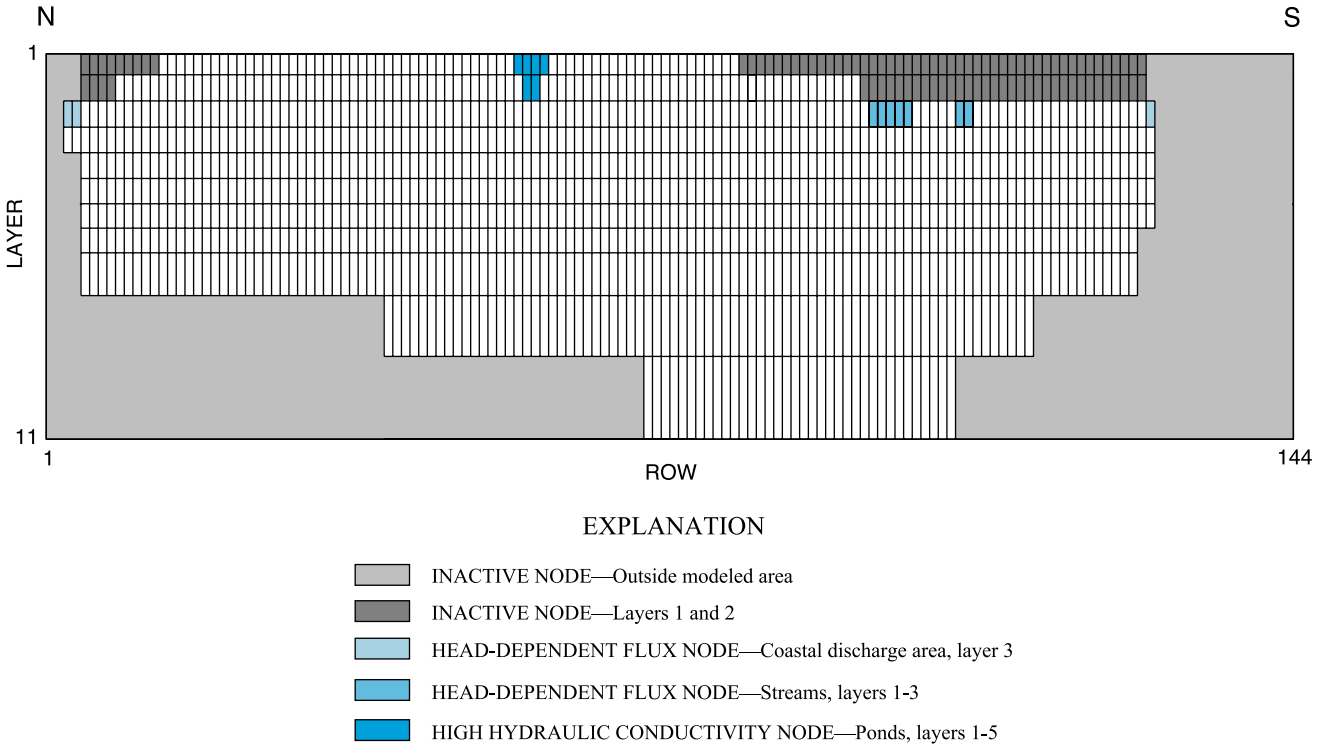


**Figure 7C.** Horizontal and vertical discretization using uniform layers for the model simulating ground-water flow on Cape Cod, Massachussetts. Vertical grid using uniform layers along column 85. (Modified from Masterson and others, 1997.)

methods, also are used. The user of a model should evaluate the appropriateness of the interpolation scheme. To make such evaluation possible, the model documentation should specify the interpolation method used and include the rationale for using that interpolation method.

Three examples of interpolated hydraulic conductivity data for a hypothetical system are shown in figure 10. All three examples are based upon the assumption that values are known (presumably from aquifer tests) at four points. Figure 10A shows the use of the nearest-neighbor method. For every cell, the data point that is closest to the center of a cell is used as the cell value. An even simpler approach would be to use a single value for all the cells that is the average of the four known values. This simpler approach could be justified if the known values are not considered to be accurate. Figure 10B shows grid values determined by using a weighted average of the four known values based on the inverse distance squared from the center of a cell to the four points. Finally, figure 10C shows grid values determined from the hydraulic conductivity of the two adjacent contours. The value for a cell is the distance-weighted average of the two contour values. Contours were drawn based on the four known points plus additional geologic information about the types of sediments throughout the area (which was made up for this example). The three distributions shown in figure 10 differ significantly even though they are all based on the same four data points. There are many other methods available for interpolation that would each produce different parameter distributions.

The authors are aware of only one general guideline to help determine the best interpolation method to use in a particular situation. This guideline states that it is best to use the simplest interpolation method that is consistent with the known data. The rationale for this guideline is that unwarranted complexity in the discretized values builds a bias into a model that affects all future use. Ideally the model developer would evaluate the importance of the interpolation method by testing different methods and comparing the effect on model results. Such testing is not always practical depending on the resources available for model development.

The chosen interpolation method is often implemented by a computer program. The model documentation should reference the program that is used. Some model programs incorporate interpolation capabilities. For example, the Hydrogeologic-Unit Flow (HUF) Package (Anderman and Hill, 2000) in MODFLOW vertically averages hydraulic properties for cells based on real-world geometry of hydrogeologic units.

The discretization of the storage properties of the ground-water system has some intricacies of its own. The two main types of aquifer storativity are confined storage (specific storage) and unconfined storage (specific yield). Unconfined storage is related to the release of water as the water table lowers (dewatering of the aquifer material); thus, it occurs only along the top boundary of the saturated flow system. Confined storage is related to the release of water as the head drops because of expansion of the water itself as the pressure changes and changes in the solid framework of the aquifer (no dewatering

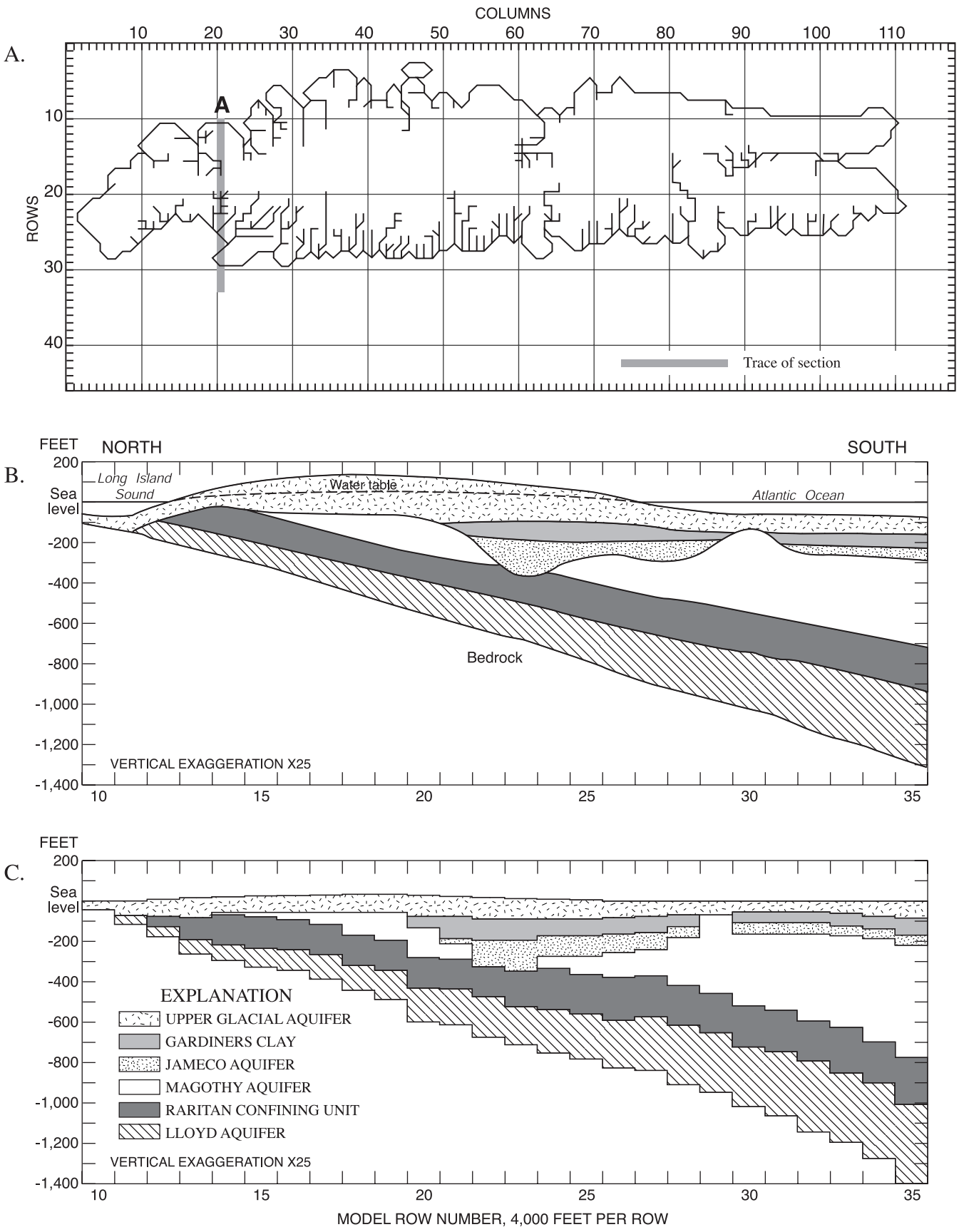


**Figure 8.** Horizontal and vertical discretization using deformed layers for the model simulating ground-water flow on Long Island, New York: (A) horizontal grid, (B) hydrogeologic cross section, and (C) vertical grid using deformed layers. (Modified from Buxton and others, 1999.)

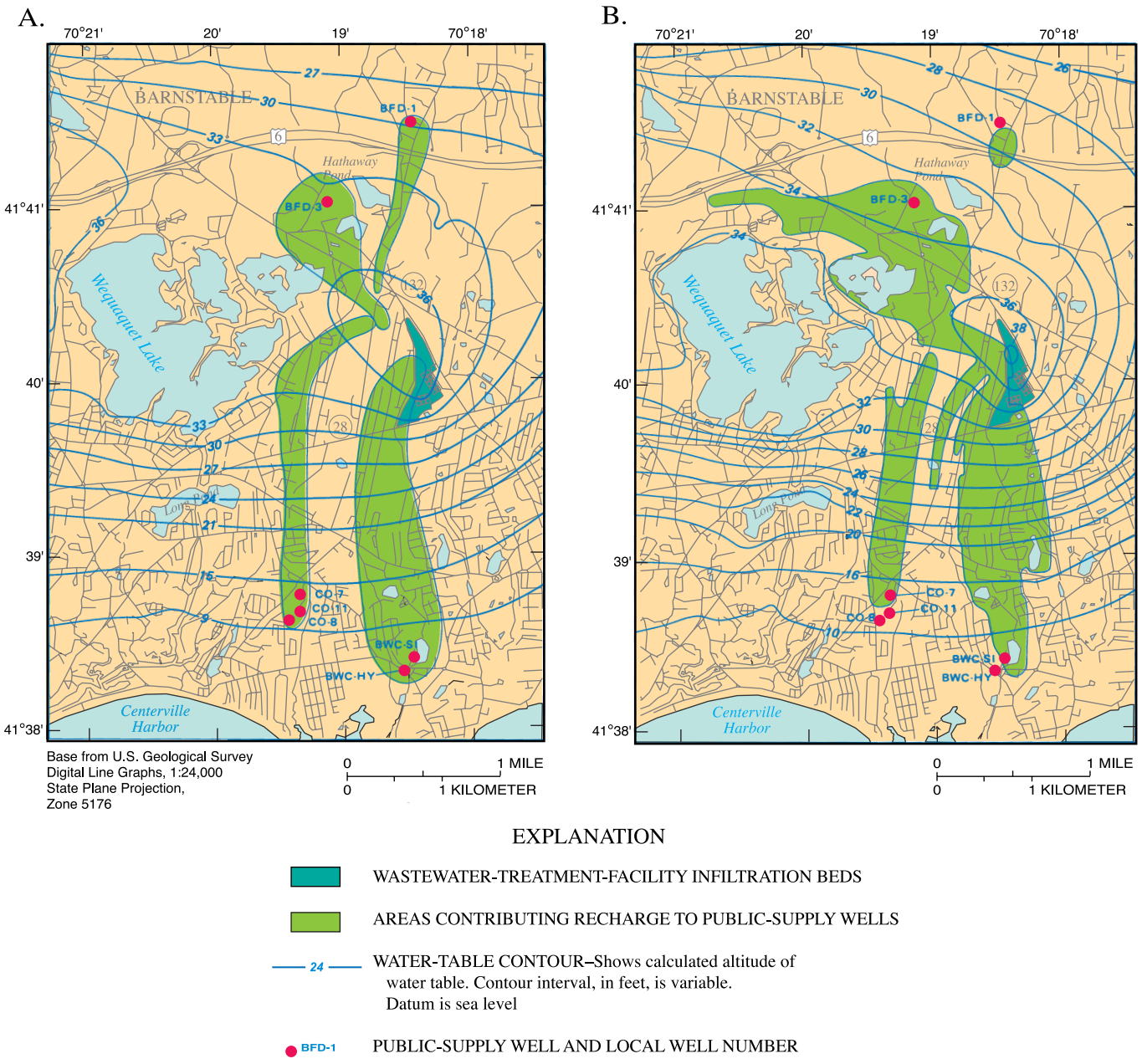


**Figure 9.** Comparison of areas contributing recharge to seven public-supply wells as determined by two different numerical models, Cape Cod, Massachusetts: (A) results from a two-dimensional single-layer model, and (B) results from a three-dimensional eight-layer model. (Modified from Barlow, 1994; and Franke and others, 1998.)

occurs). In simulating the changes in storage for transient systems, it is important that the unconfined storage occurs only at the top boundary (or top active layer), even if the water-table aquifer is divided into many layers. Some model programs, such as MODFLOW, control which storage coefficient is used based on the layer geometries and heads, thus ensuring that the proper (either the specific storage or the specific yield) coefficient is used. Other model programs require the user to specify the coefficient for each cell. Some investigators have erroneously specified specific yield for all layers in an unconfined aquifer, when it should be specified only for the uppermost active layer, causing incorrect quantities of water to be simulated from storage. Thus, care must be taken in determining if the proper storativity is simulated in a model.

Models that simulate a water table also can have a uniqueness problem related to the representation of the hydrogeologic framework by discrete volumes. Ground-water model programs such as MODFLOW allow cells representing the water table to go dry (desaturate) so that ground-water flow is not simulated in those cells. Cells also can convert from dry to wet in some situations. Cell wetting and drying depends on a variety of factors such as initial conditions, the iterative solution process, and

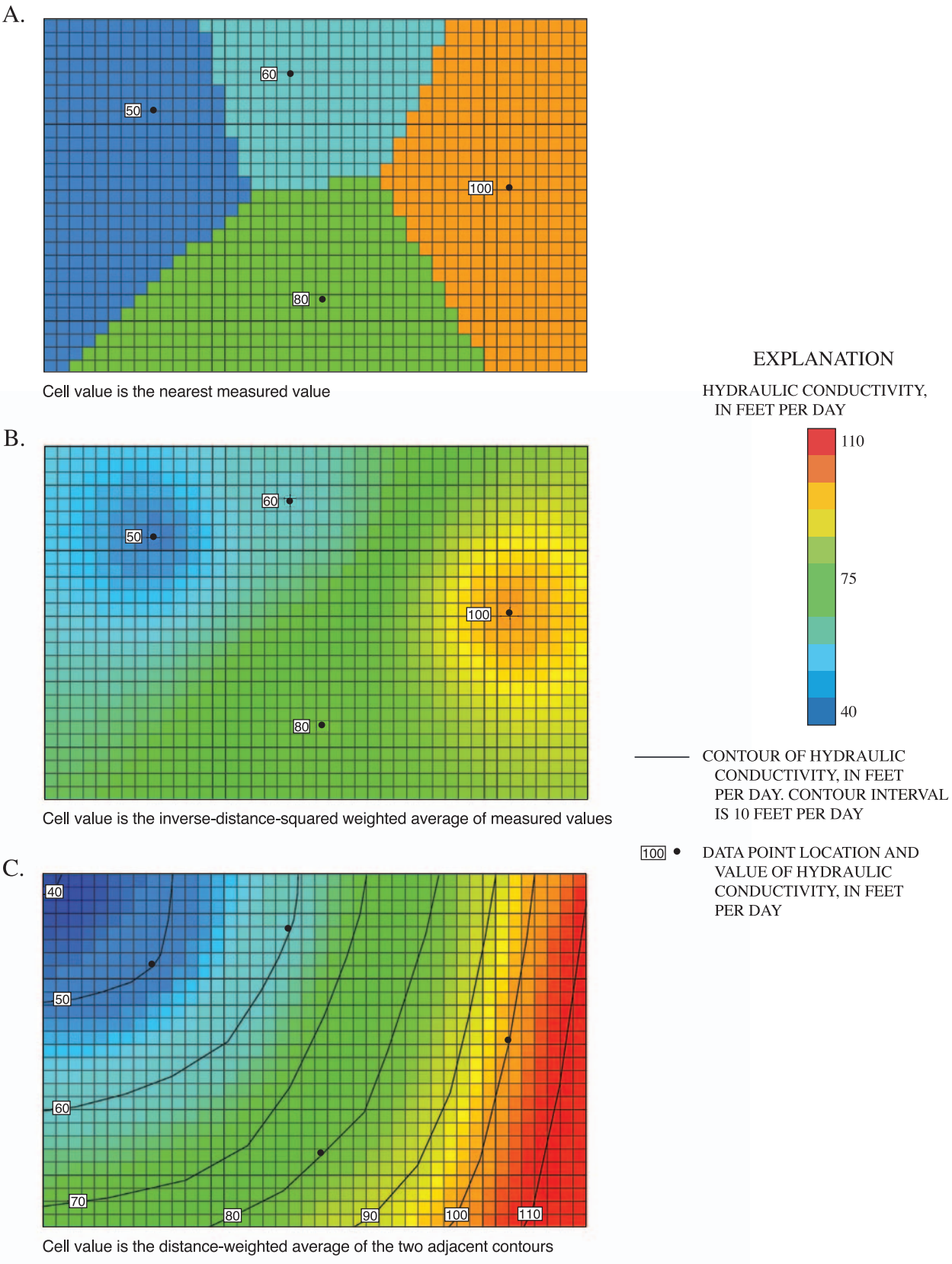


**Figure 10.** Examples of interpolating data for cells from measured data. (A) Cell value is the nearest measured value, (B) cell value is the inverse-distance-squared weighted average of measured values, and (C) cell value is the distance-weighted average of the two adjacent contours.

user-specified options to control wetting and drying. By varying these factors, it is possible to change the number of dry cells, and thus the head will vary. Careful evaluation is required to detect the potential for nonuniqueness and reject solutions that are unreasonable.

To avoid solver convergence problems that sometimes occur when cells can convert between wet and dry, some investigators have resorted to specifying cells representing the water table as having a constant saturated thickness. It is important to evaluate the extent to which this has been done and the degree to which the thickness represented by the simulated heads varies from the assumed specified thickness. For steady-state models, the following process can be repeated until the simulated saturated thickness is reasonably close to the specified saturated thickness:

1. Run the model.
2. Compare the simulated saturated thickness (head minus bottom elevation) to the specified saturated thickness.
3. Adjust the specified saturated thickness to match the simulated thickness.

For transient models, the changes in saturated thickness throughout the simulation can be compared to the specified saturated thickness to insure that the change is small compared to the total saturated thickness.

## Time Steps

Transient models simulate the impact of stresses over time. In MODFLOW, time is divided into time steps, and head is computed at the end of each time step. Many time steps are required to simulate a complex distribution of head over time. This is similar to the need for many cells to represent the spatial distribution of head. It is important to incorporate enough time steps to allow the temporal complexity of head distribution to be simulated.

Figure 11 shows the effect of using different numbers of time steps to simulate the drawdown of a well. The system is the same as that used for the fine-grid simulation in figure 3, with a dimensionless storage coefficient of 0.01 and a well located in the cell at row 17 and column 17. The hydrographs are for the cell at row 17, column 13, which is the 4$^{th}$ cell directly to the left of the pumping cell. At the start of the simulation, the well is turned on with a pumping rate of 100,000 ft$^3$/d. Each time step is 1.5 times longer than the previous time step, which results in more time steps in early time when head is changing most rapidly. Use of six or more time steps in this model produces nearly the same results, but four or less time steps produces much different results, especially in early time.

MODFLOW also makes use of stress periods to facilitate specification of stress data. A stress period is a group of one or more time steps in which stress input data are constant. In many situations, it is appropriate to maintain the same stresses for multiple time steps, so combining time steps into a stress period for the purposes of data input minimizes the data preparation effort. A new stress period must start whenever it becomes necessary to change stress input data. If stress periods are too long, important dynamics of the stresses may be left out or poorly represented. For example, the Well Package of MODFLOW (Harbaugh and others, 2000) allows pumping rates for wells to change every stress period, and within a stress period the pumping is constant. If the simulation is broken into stress periods of one year, for example, but the actual pumping rate changes more frequently, then stress periods may need to be shorter.

The intended use of the model is also an important factor in evaluating whether the size of stress periods and time steps is appropriate. Considering again the simulation of wells, if a model is used to analyze the average response of a system over many years, then pumping might be represented as yearly averages using yearly stress periods. There would likely be multiple time steps in each yearly stress period, but the stress would remain constant for each year. Thus, hourly, daily, and seasonal variations in pumping would be ignored. But, if a model is used to simulate seasonal system response, then pumping should be represented with shorter stress periods – perhaps monthly.

Questions to be answered in evaluating the appropriateness of the discretization and the representation of the hydrogeologic framework in the simulation of the ground-water system are:

1. Does the horizontal discretization represent the important features of the hydrogeologic framework to meet the objectives of the study?

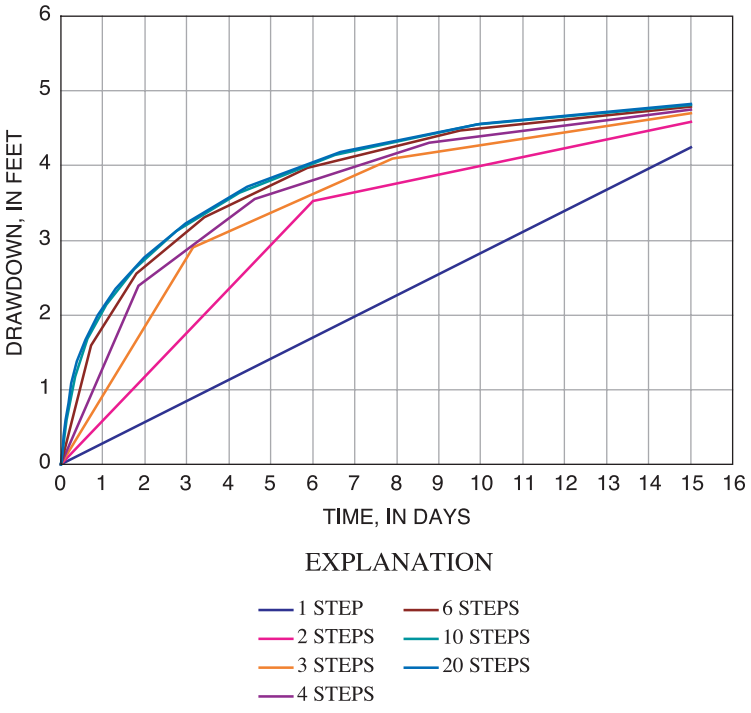


**Figure 11.** Drawdown versus time for different numbers of time steps.

2. Are the physical boundaries represented appropriately in space by the discretized representation?
3. Is the horizontal discretization appropriate to represent the degree of complexity in the aquifer properties and head distribution (flow system)?
4. Does the vertical discretization adequately represent the vertical connectivity and transmitting properties of the hydrogeologic framework to meet the objectives of the study? Does the method of vertical discretization, either a rectilinear grid or deformed grid, introduce any bias into the representation of the hydrogeologic framework?
5. Is the method of assigning parameter values to individual cells explicitly explained? Is the method appropriate for the objectives of the study and the geologic environment?
6. If the ground-water system is transient, then is the specification of storage coefficients appropriate?
7. If the ground-water system is unconfined in some areas, then is the treatment of changes in saturated thickness and the potential for cells to go dry explained and appropriate? If cells have gone dry, does the resultant solution seem appropriate?
8. Is the time discretization fine enough to represent the degree of complexity in stresses and head distribution over time?

The evaluation of the proper or sufficient discretization of the hydrogeologic framework of a ground-water flow simulation is not straightforward to determine. The continuity of deposits and the reasonableness of the specification of values for each cell in light of the depositional environment of the hydrogeologic framework must be considered. As always, the objectives of the study also determine which features must be represented in the model and the level of detail required to adequately represent their effect on the flow system.

## Representation of Boundary Conditions

Boundary conditions are a key component of the conceptualization of a ground-water system. The topic of boundary conditions in the simulation of ground-water flow systems has been discussed in Franke and others (1987) and Reilly (2001).

As discussed in Reilly (2001), computer simulations of ground-water flow systems numerically evaluate the mathematical equation governing the flow of fluids through porous media. This equation is a second-order partial differential equation with head as the dependent variable. In order to determine a unique solution of such a mathematical problem, it is necessary to specify boundary conditions around the flow domain for head (the dependent variable) or its derivatives (Collins, 1961). These mathematical problems are referred to as boundary-value problems. Thus, a requirement for the solution of the mathematical equation that describes ground-water flow is that boundary conditions must be prescribed over the boundary of the domain. Boundary conditions also represent any flow or head constraints within the flow domain. For example, recharge from percolation of precipitation, river interaction, and pumping from wells are simulated as boundary conditions. Three types of boundary conditions—specified head, specified flow, and head-dependent flow—are commonly specified in mathematical analyses of ground-water flow systems. The values of head (the dependent function) in the flow domain must satisfy the preassigned boundary conditions to be a valid solution.

In solving a ground-water flow problem, however, the boundary conditions are not simply mathematical constraints; they generally represent the sources and sinks of water within the system. Furthermore, their selection is critical to the development of an accurate model (Franke and others, 1987). Not only is the location of the boundaries important, but also their numerical or mathematical representation in the model. This is because many physical features that are hydrologic boundaries can be mathematically represented in more than one way. The determination of an appropriate mathematical representation of a boundary condition is dependent upon the objectives of the study. For example, if the objective of a model study is to understand the present and no estimate of future conditions is planned, then local surface-water bodies may be simulated as known constant-head boundaries; however, if the model is intended to forecast the response of the system to additional withdrawals that may affect the stage of the surface-water bodies, then a constant head is not appropriate and a more complex boundary is required. A model of a particular area developed for one study with a particular set of objectives may not necessarily be appropriate for another study in the same area, but with different objectives. All of these aspects of boundary conditions must be considered in evaluating the strengths and weaknesses of a ground-water flow model.

In the ground-water flow modeling process (fig. 12), boundary conditions have an important influence on the areal extent of the model. Ideally in developing a conceptual model, the extent of the model is expanded outward from the area of concern both vertically and horizontally so that the physical extent coincides with physical features of the ground-water system that can be represented as boundaries. The effect of these boundaries on heads and flows must then be conceptualized, and the best or most appropriate mathematical representation of this effect is selected for use in the model.

When physical hydrologic features that can be used as boundary conditions are far from the area of interest, artificial boundaries are sometimes used. The use of an artificial boundary should be evaluated carefully to determine whether its use would cause unacceptable errors in the model. For example, a no-flow boundary might be specified along an approximated flow line at the edge of a modeled area even though the aquifer extends beyond the modeled area. The rationale might be that the artificial boundary is positioned far enough from the area of interest that whatever is simulated in the area of interest would not cause significant flow across that area of the system. The rationale for artificial boundaries can generally be tested using the model. In the example of an artificial no-flow boundary, the

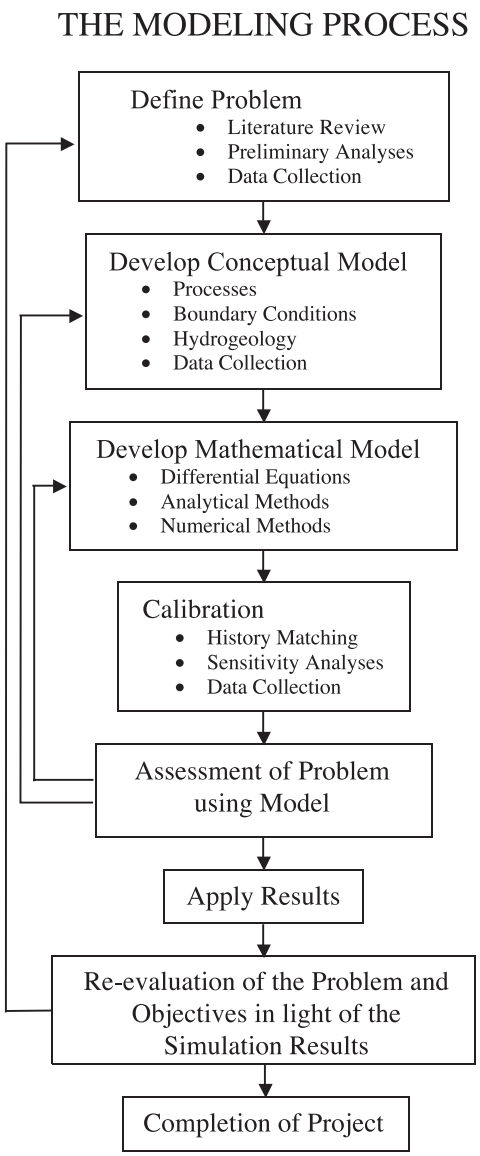


**Figure 12.** Flow chart of the ground-water flow modeling process. (From Reilly, 2001.)

appropriateness can be tested by looking at how much the head changes near the boundary when the model is used for its intended purpose. Substantial change in heads near the boundary is an indication that significant flow across the region would occur if the artificial boundary were not imposed.

Another example of an artificial boundary is a specified-head boundary at a location where there is no source of water to maintain the head at its specified value. The appropriateness of this boundary can be tested by evaluating the flow from the boundary and the change in flow due to changes in parameter values or stresses within the model. If a stress causes a large change in flow from the boundary, then the head would probably change at the boundary if it were not artificially fixed. Artificial boundaries, if applied improperly and not evaluated, can overly constrain the response of the system and bias the results of an analysis. A frequently observed example is when the area of interest for a study is artificially bounded by specified heads, without regard to the flow being simulated from this boundary into the study area. In this case, the model may not be sensitive to parameter values and stresses because the specified heads artificially keep the simulated heads from deviating much. For further discussion of this topic, see Franke and Reilly (1987).

The objective of the modeling analysis and the magnitude of the stresses to be simulated also influence the selection of the appropriate approach to simulate the physical features that bound the ground-water system. When ground-water systems are heavily stressed, the physical features that bound the system can change in response to the stress. Any representation of these features must account for these potential changes, either by understanding the limitations of the simulation or by representing the physical feature as realistically as possible.

In evaluating the appropriateness of a ground-water flow model, the boundary conditions are key because they determine where the water enters and leaves the system. If the boundaries are inappropriate, the model will be a poor representation of the actual ground-water flow system. Questions to be used in evaluating the boundary conditions of a ground-water flow model are:

1. Are all the external boundaries of the model associated with a definable physical feature?

If no –

   A. Why not?

   B. Is sufficient justification provided to warrant the use of artificial boundaries?

   C. Are the effects of the "artificial" boundaries tested in the calibration of the model and documented in the report? Does the documentation of their use and their testing make a convincing argument for their reasonableness?

If yes –

   A. Is the mathematical representation of the physical feature appropriate?

   B. Are there conditions under which the representation of the boundary used in the model would become invalid? Are these conditions discussed?

2. Do the boundary conditions of the model overly constrain the model results so that the calibration is insensitive and the predictions are not realistic?

## Representation of Initial Conditions in Transient Simulations

Initial conditions represent the heads at the beginning of a transient simulation. Thus, initial conditions serve as a boundary condition in time for the transient head response of a ground-water model solution. Initial conditions are used only in transient simulations, and are different from starting heads (or

the initial guess) in steady state solutions. In steady-state solutions, the starting heads can and do affect the efficiency of the matrix solution, but the final correct solution should not be affected by different starting heads. In transient solutions, however, the initial conditions are the heads from which the model calculates changes in the system due to the stresses applied. Thus, the response of the system is directly related to the initial conditions used in the simulation.

The changes in head that occur in the transient model due to any applied stress will be a combination of the effect of the change in stress on the system and any adjustments in heads as a result of errors in the initial head configuration (the initial conditions). Adjustments in heads resulting from errors in the initial head configuration do not reflect changes that would occur in the actual system, but rather occur because the heads specified as the initial condition are not a valid solution to the numerical model. Because errors in the initial head conditions cause changes in head over time during the simulation, it is best to begin all transient simulations with a head distribution that is a valid solution for the model. This ensures that there are no discrepancies (or errors) between the specified initial conditions and a valid head solution for the model.

For simulations that start from a period when the aquifer system was in a steady-state equilibrium, the development of appropriate initial conditions is straightforward. A simulation of the steady-state period should be made. The results of this simulation should then be used as the initial conditions for the transient simulation.

Sometimes, however, it is not possible to start a simulation from a point in time where the aquifer was in steady-state equilibrium. This condition could occur if the simulation is intended to simulate seasonal or other cyclic conditions where the system is never at steady state, or in instances where there is a period of unknown stress that cannot be reproduced accurately, or when it is not feasible to simulate the entire period of record from a time of steady state because of time and money constraints. Under these conditions, it is important that the initial conditions used do not bias the results for the period of interest. Some rules of thumb for the evaluation of the appropriateness of the initial conditions in these non-ideal situations are to evaluate the time constant of the system under investigation and to test the effect of different initial conditions on the results of the model.

The time constant for a ground-water system is derived from a dimensionless form of the ground-water flow equation and is defined as (Domenico and Schwartz, 1998, p. 73):

$$T = \frac{S_s L^2}{K},$$

where $T$ is the time constant (T), $S_s$ is the specific storage of a confined aquifer ($L^{-1}$), $L$ is a characteristic length of the system (L), and $K$ is the hydraulic conductivity ($LT^{-1}$). The effect of any transient condition will not be observable if the time after the condition occurs is significantly larger than the time constant for the aquifer ($T$) (Domenico and Schwartz, 1998). Thus, the effect of a poor or erroneous initial condition (assuming the rest of the model including boundary conditions is correct) should not be observable in model results that are for periods of time significantly larger than the time constant for the aquifer. The time constant is developed from the ground-water flow equation for a confined system with homogeneous hydraulic conductivity. Thus, its application in actual systems is not always exact. The appropriate characteristic length ($L$) of the system is usually chosen to represent the distance between major boundaries. The specific storage ($S_s$) represents the compressible storage characteristics of the system; however, an equivalent storativity for unconfined aquifers could be calculated as the specific yield ($S_y$) divided by the thickness (b) of the unconfined aquifer. For unconfined aquifers, an approximate time constant would be:

$$T = \frac{S_y L^2}{bK}.$$

The determination of the importance and duration of effects of erroneous or imperfect initial conditions can also be accomplished by testing the effect of different initial conditions on the model under study. This test is accomplished by simulating the same system with the stresses and different initial conditions. When the simulations for all the different initial conditions produce the same result, then one can assume the influence of the inaccurate initial conditions is negligible at all following time periods.

A simulation of a simple transient ground-water system can illustrate some of these points. In the illustrative simulation, the simple transient ground-water system is 20,000 ft long and 20,000 ft wide with two aquifers separated by a confining unit, and bounded by no-flow boundaries with a stream along one edge. The aquifer has uniform areal recharge of 0.003 ft/d. The upper aquifer is unconfined and both aquifers have a horizontal hydraulic conductivity of 50 ft/d and a vertical hydraulic conductivity of 5 ft/d. The confining bed is 10-ft thick with a vertical hydraulic conductivity of 0.001 ft/d. The system is discretized as shown in figure 13, and simulated using the finite-difference model MODFLOW. The areal grid size is 1,000 ft by 1,000 ft, and the two aquifers are each represented by two layers; the bottom aquifer is represented by a lower layer (layer 4) 50-ft thick overlain by a 40-ft thick layer (layer 3), and the unconfined aquifer is represented by a 50-ft thick layer (layer 2) overlain by a layer (layer 1) with a uniform bottom at –50 ft, which allows changes in thickness as a function of the head. The stream is represented as a constant head of 0 ft along the right-hand boundary in the top layer. The specific yield for the top layer is 0.2 and the specific storage for the entire model domain is $1.0 \times 10^{-6}$ 1/ft.

The steady-state head distribution for the simple system in layer 1 is symmetric perpendicular to the stream and varies from 67.94 ft at the ground-water divide to 0.0 ft at the stream (fig. 14). A transient simulation is run from the initial steady state to examine the effect of a well discharging 100,000 $ft^3$/d from layer 3 in cell 10, 10 (9,500 ft from the divide). The correct simulation has as the initial condition the steady-state head

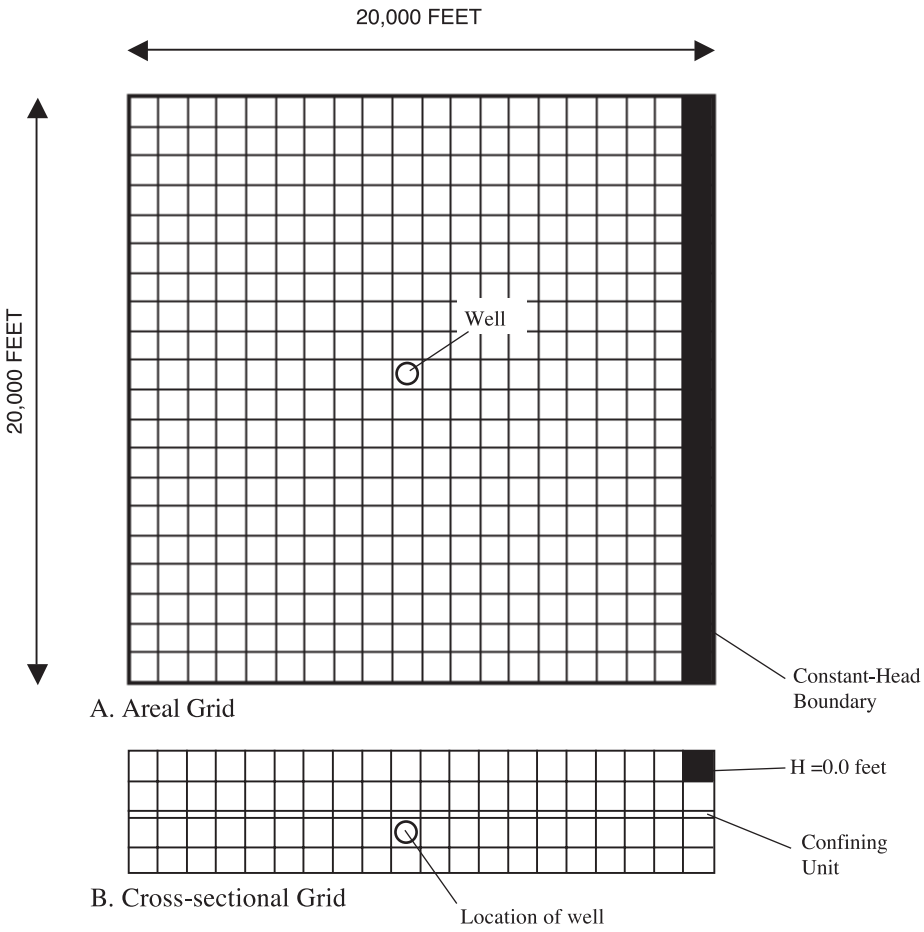


**Figure 13.** Extent and model grid of the finite-difference model used to illustrate initial conditions: (A) areal grid, and (B) cross-sectional grid.

distribution before the well began discharging; the response of the system through time is shown at the divide in layer 1 (fig. 15A) and at the cell containing the well in layer 3 (fig. 15B). The effect of inaccurate initial conditions can be observed in the response of the aquifer at these same locations. Two different initial conditions, as shown on figure 14, are used to test the response of the system to inaccurate initial conditions. These two other conditions are a uniform head of 100 ft everywhere (all layers), except at the stream, and a linearly changing initial head ranging from 95 ft to 0 ft at the stream. The response of the system over time in response to the pumping well compared to the correct response that used the steady-state head distribution is shown in figure 15 for a cell in layer 1 at the divide and for the cell containing the well in layer 3. The time constant can also be calculated for this system, although some approximations must be made to estimate a saturated thickness. If the saturated thickness of the unconfined aquifer is assumed to be 100 ft (the thickness at the stream), then the time constant is calculated as:

$$T = \frac{0.2(20,000\text{ft})^2}{100.\text{ft}(50\ \text{ft/d})} = 1.6\times10^4\ \text{days} = 44\ \text{years}.$$

As shown in figure 15, the curves for the two inaccurate initial conditions do not approach the correct transient response until about 20 to 40 years after the start of pumping. Thus, inaccurate initial conditions can cause errors for a significant time period in transient simulations.

Examination of the simulated response through time from 0-5 years in the finite-difference cell containing the well illustrates some interesting points. The correct response of the system is simulated for the case with the steady-state heads as the initial conditions (fig. 16); the initial value for the head is 50.09 ft in the cell containing the well. The case with the linearly varying heads as initial conditions has the initial value for the cell containing the well equal to 50.0 ft, which is almost the same as the correct steady-state value. Even though the initial conditions in the individual cell are almost the same, the response is different, because the initial conditions over the entire model domain affect the head response. The response of the system with the linearly varying initial conditions is obviously in error because the response of the system shows an increase in head after the first time step in response to pumping, which is not physically reasonable.

Questions to be used in evaluating the initial conditions of a ground-water flow model are:

1. Does the transient model simulation start from a steady-state condition?

If yes –

A. Were the initial conditions generated from a steady-state simulation of the period of equilibrium, which is the preferred method?

B. If the initial conditions were not generated from a steady-state simulation of the period of equilibrium, then is there a compelling reason why they were not generated, or are the initial conditions invalid?

If no –

A. Was it possible to select a period of equilibrium to start the simulation and make the determination of initial conditions more straightforward? If it is possible, then the model should have simulated the transient period from the period of equilibrium.

B. If it was not possible to select a period of equilibrium to start the simulation, then what was the justification for selecting the starting time and the initial conditions for the simulation? How was it shown that the initial conditions used did not bias the result of the simulation?

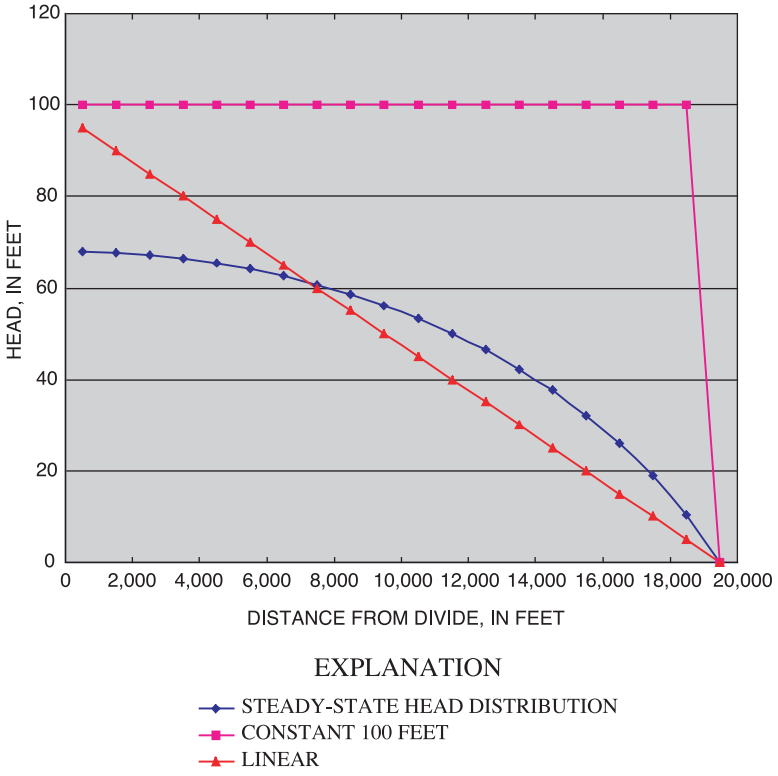


**Figure 14.** Head distribution along a model row from the divide to the constant-head node for three different initial conditions used for a transient simulation.

## Accuracy of the Matrix Solution

Discrete numerical models involve the solution of large sets of simultaneous algebraic equations (Harbaugh and others, 2000). This solution of large sets of algebraic equations usually involves the use of sophisticated matrix solution techniques. Most of the solution techniques are iterative in nature whereby the solution is obtained through successive approximation, which is stopped when it is determined that a "good" solution has been obtained (Bennett, 1976). The criterion used in most iterative solution techniques is called the "head change criterion." When the maximum absolute value of head change from all nodes during an iteration is less than or equal to the selected head change criterion, then iteration stops.

When evaluating a ground-water flow model, even if the computer model has output results, one must check to determine if indeed a solution has been obtained by the matrix solution technique. The first check is to evaluate the head change criterion. Was the head change criterion set small enough to obtain a model solution with minimal error? One means of evaluating the head change criterion is to examine the global mass balance for the model. If the error in the mass balance (for example, total inflow minus total outflow divided by one half the sum of the inflow and outflow) over the entire model domain is small, usually less than

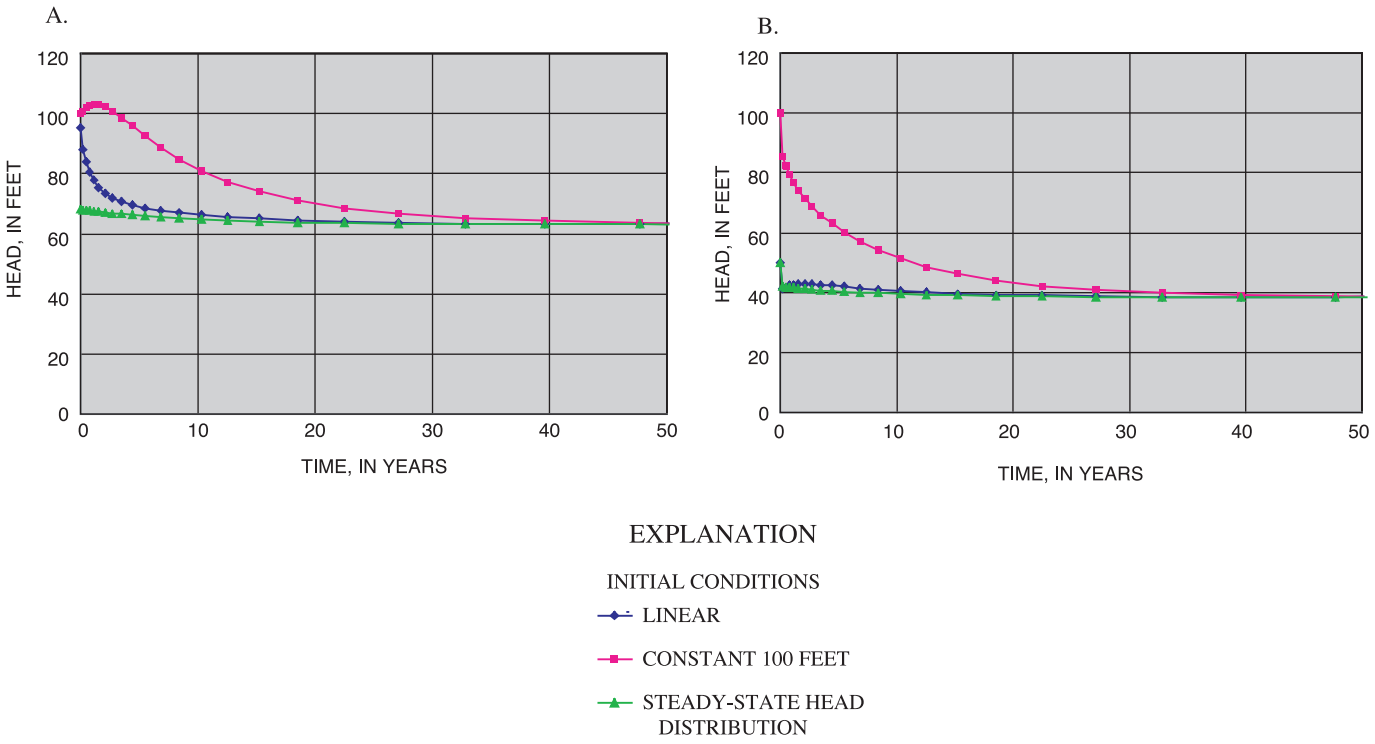


**Figure 15.** Head in a cell through time in response to a well discharging at a rate of 100,000 $ft^3/d$: (A) the head in layer 1 at the divide, and (B) the head in the cell with the discharging well in layer 3.

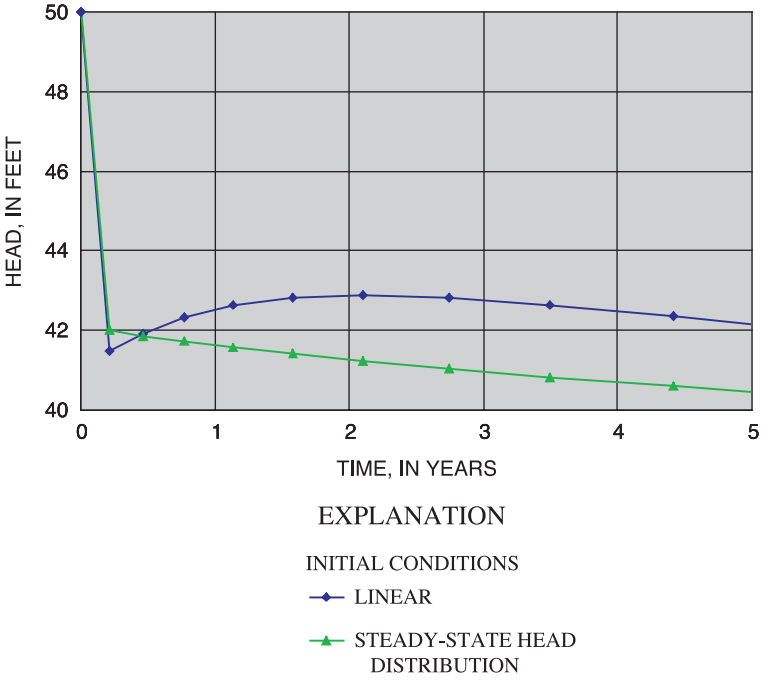


**Figure 16.** Head in the well for the first 5 years after the start of pumping for the cases using the initial conditions of the steady-state head distribution and the linearly varying head distribution.

0.5 percent, then the head change criterion is assumed to have been sufficient. If the error in the mass balance calculations is significant, then the matrix solution was not good and the model should be corrected by improving the matrix solution. The matrix solution can be improved by lowering the head change criterion, adjusting iteration parameters (if the solution techniques use iteration parameters), using different starting heads for steady-state simulations, or using a different solution technique.

Even if the head change criterion is met and the global mass balance error is small, the model solution may not be appropriate for the system under investigation. Two potential reasons are that some models can either be mathematically nonunique or very nonlinear. The mathematically nonunique problem usually is a poorly posed problem where a model has only specified-flow boundary conditions and no other boundary condition that specifies a head or datum (such as, constant head, river stage, general head boundary, etc.). In this type of problem, there is a family of solutions all with the same gradients but different absolute heads. The matrix solution technique may not converge or it may converge to one of the infinite number of possible solutions.

In nonlinear problems, the solution affects the coefficients of the matrix being solved; thus, the solution affects the problem being solved. As a result, the manner in which the iterative solution technique approaches a solution can affect the final solution. An example from Reilly (2001) illustrates this point. Consider a one-dimensional water-table system with a sloping impermeable bottom that contains a specified head and extends 5,000 m, with an areal recharge rate of 0.5 m/yr. The starting head for the equation solution is specified at 20 m, which is above all the bottom elevations of the cells but yet close to the magnitude of the expected results. Figure 17A is a cross-sectional view of a finite-difference representation of the steady-state solution. The cell farthest from the specified head is simulated as being dry. The total recharge flowing to the specified head cell for a 500-m width is 2,740 $m^3$/d. The convergence criterion of the model was met and the mass balance was excellent (showing 0.00 percent budget discrepancy). Now consider figure 17B, which is the result of a simulation of the same problem, except the starting head for the matrix solution was set at 100 m. As is shown in figure 17 and table 2, three cells are now simulated as being dry. The result is that less recharge is simulated as entering the model and the heads and water budgets are reduced accordingly, with only 2,055 $m^3$/d being represented as recharge entering the system for a 500-m width. Although both solutions converged and had excellent mass balances, at least one of them is incorrect. Because it is a nonlinear problem, it is not easy to determine which solution is correct. The rate of convergence and the method of making cells inactive must be considered and evaluated. After evaluating these aspects, and noting that the head in cell 7 (table 2 and fig. 17) of the second model is above the bottom elevation of cell 8, which was converted to dry during the iterative process, it seems that the first model most likely is correct. In the second model, the iterative solution, in attempting to converge, apparently overshot the bottom of some of the cells, which prematurely or erroneously truncated the area from the active model domain,

**Table 2.** Heads calculated for the same system with areal recharge and two different intitial heads.

[m, meters]

| Cell number | Bottom elevation of cell | Head calculated with the initial head at 20 m | Head calculated with the initial head at 100 m |
|---|---|---|---|
| 1 | -30.0 | 0.00 | 0.00 |
| 2 | -25.0 | 1.93 | 1.46 |
| 3 | -20.0 | 3.83 | 2.86 |
| 4 | -15.0 | 5.68 | 4.17 |
| 5 | -10.0 | 7.49 | 5.38 |
| 6 | -5.0 | 9.24 | 6.42 |
| 7 | 0.0 | 10.90 | 7.20 |
| 8 | 5.0 | 12.45 | Dry |
| 9 | 10.0 | 13.81 | Dry |
| 10 | 15.0 | Dry | Dry |

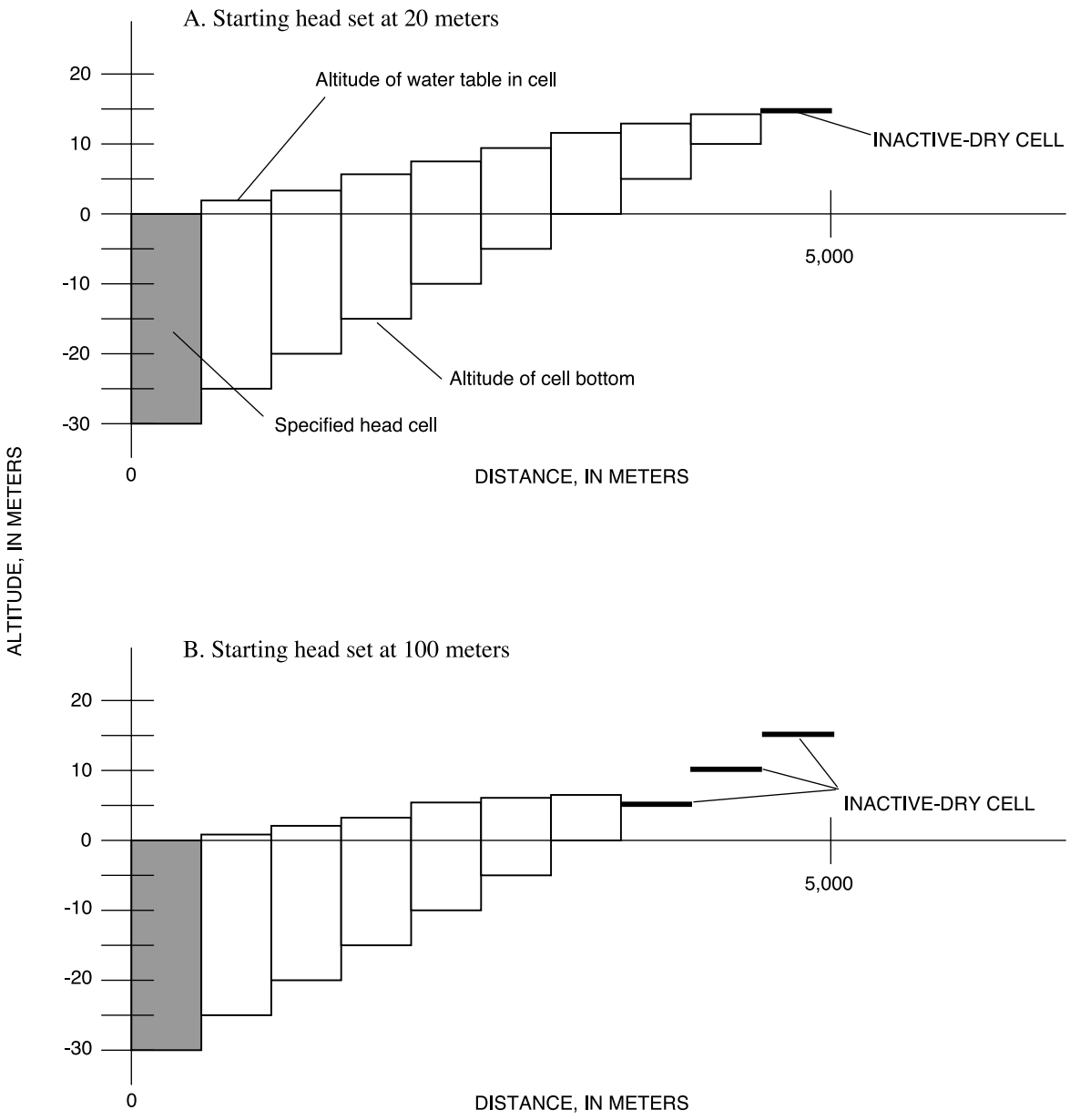


**Figure 17.** Cross-sectional view of a finite-difference representation simulating a variable thickness ground-water system with flow to a specified head due to areal recharge: (A) starting head set at 20 meters, and (B) starting head set at 100 meters. (From Reilly, 2001.)

and resulted in the wrong problem being solved. The model developer or user must carefully evaluate nonlinear problems and monitor the rate of convergence to ensure that cells that should be part of the active problem domain are not removed.

The accuracy of the matrix solution usually is not an issue with ground-water models that meet the head change criterion and have small mass balance errors. It is important when using models and especially nonlinear models, however, to keep in mind that the accuracy of the solution is not assured, which is another aspect for continued evaluation. Some models do not converge smoothly, and investigators use non-standard methods (tricks) to obtain a model solution. For example, some non-standard methods that have been used include: the saving of intermediate solutions that have not yet converged and changing matrix solution parameters when restarting the model; making a nonlinear water-table simulation linear by fixing the saturated thickness of the model; and obtaining a steady-state solution by using storage to slow convergence and damp the approach to the solution through simulating a long transient time period. As long as the non-standard method does not violate any important hydrologic process, they are usually transparent to the final solution and are appropriate. However, these

non-standard techniques should be evaluated to determine whether they cause potential errors to be introduced to the model solution.

Questions to be addressed when evaluating the adequacy of the matrix solution in the simulation of a ground-water system are:

1. Is the ground-water system and set of matrix equations linear or nonlinear?

If linear –

   A. Was the head change criterion met and was it sufficiently small to obtain an acceptable (that is, less than 0.5 percent error) global mass balance?

If nonlinear –

   A. Was a nonlinear matrix solution technique used?

   B. Was the head change criterion met and was it sufficiently small to obtain an acceptable (that is, less than 0.5 percent error) global mass balance?

   C. Did the nonlinear terms, such as cells going dry or drains turning off, behave smoothly during the iteration process? Or were there large oscillations that would indicate a potential for convergence to an incorrect solution?

   D. Were any "tricks" used to smooth convergence, such as setting saturated thickness as a constant in water-table simulations, and are the assumptions used in defining these artificially constrained features reasonable for the solution obtained?

2. Does the solution seem reasonable for the problem posed? If it is not and there are no input data errors, then another matrix solution technique should be tried to determine whether it is a matrix-solution issue or some other problem.

## Adequacy of Calibration for Intended Use of Model Results

As discussed previously, not all objectives of using a ground-water model require calibration. For models that require calibration, however, an evaluation of the adequacy of the calibration is another difficult task. There are different quantitative measures that investigators use to show the accuracy of the calibration of a ground-water flow model. Some of these are: the mean error, the mean absolute error, and the root mean squared error (Anderson and Woessner, 1992). The areal distribution of residuals (differences between measured and simulated values) also is important to determine whether some areas of the model are biased either too high or too low. The difficulty that arises, however, is how to determine what is good enough.

As stated previously, key aspects of the model, such as the conceptualization of the flow system, that influence the appropriateness of the model to address the problem objectives, are often not considered during calibration by many investigators; their focus is on the quantitative measures of goodness of fit. However, the appropriateness of the conceptualization of the ground-water system and processes should always be evaluated during calibration. Thus, the method of calibration, the closeness of fit between the simulated and observed conditions, and the extent to which important aspects of the simulation were considered during the calibration process are all important in evaluating the appropriateness of the model to address the problem objectives.

Freyberg (1988) reported on a class exercise where different models were calibrated by students using the same model and identical sets of data. Freyberg's observations of the exercise showed that "success in prediction was unrelated to success in matching observed heads under premodification conditions." He concluded, "good calibration did not lead to good prediction." This is not to imply that matching heads is unimportant, only that there are other factors that need to be considered in determining the "goodness" of a model. Put in terms of logic, a good match between calculated and observed heads and flow is a necessary condition for a reasonable model, but it is not sufficient. The conceptual model and the mathematical representation of all the important processes must also be appropriate for the model to accurately represent the system under investigation. Thus, a model that matches heads and flows well must also be evaluated to determine if it is a reasonable representation of the system under study. As stated by Bredehoeft (2003), "A wrong conceptual model invariably leads to poor predictions, no matter how well the model is fit to the data."

Thus, the evaluation of the adequacy of the calibration of a model should be based more on the insight of the investigators and the appropriateness of the conceptual model rather than the exact value of the various measures of goodness of fit. For example, it would be possible to specify every cell in a model that had an observation associated with it as a specified head cell in the model. This would produce a perfect match between simulated and observed heads, however, it is conceptually unreasonable to simulate random cells as specified heads that could serve as sources and sinks of water. Thus, although the measures of calibration might make it appear to be a well-calibrated model, in effect the violation of a reasonable conceptual model makes it a poor model. A model developed according to a well-argued conceptual model with minor adjustments, in our opinion, is generally superior to a model that has a smaller discrepancy between simulated and observed heads because of unjustified manipulation of the parameter values. A reasonable representation of the conceptual model and sources of water is more important than blindly minimizing the discrepancy between simulated and observed heads.

Models can be calibrated by trial and error or by automatic parameter estimation techniques, such as nonlinear regression to minimize some measure of goodness of fit between the simulated and observed values. A key concept in automatic parameter estimation methods is that a limited set of parameters used in the model is designated to be automatically adjusted. These parameters usually are identified for specific regions (or zones)

of the model that are determined before the calibration process (a priori). An example of parameter zones for hydraulic conductivity is shown in figure 18 for the top two layers of a model of the Albuquerque Basin, New Mexico (Tiedeman and others, 1998). In this example, the zones represent different hydrogeologic units. The areal extent of these units remains fixed during automatic calibration, and the conceptualization of the location and extent of these zones is part of the information specified before the automatic calibration process. The parameters and boundary conditions that are not identified for automatic calibration either remain fixed at their initial values or must be calibrated by trial and error. In addition, most automatic calibration methods weight observations according to the investigators insight into the reliability of the observations. Obviously, if the model is conceptualized incorrectly, the parameter zones are not representative of the actual parameter distribution, the fixed parameters and boundary conditions are poorly chosen, or the weighting functions are not appropriate, then the resultant estimates of the parameter values will be inaccurate even if the residual between observed and simulated conditions is automatically minimized.

If there are errors in the model conceptualization, the parameter zones selected, and the weighting functions defined for observed values, then the parameter estimation methods will provide the best parameters for the poorly defined model. This does not mean that the model will be an accurate representation of the system or will produce reasonable predictions. Perhaps the best use of the formal parameter estimation methods is to test different model, zone, and weighting function conceptualizations and determine which conceptualizations are most reasonable. In testing alternative models, Hill (1998) states that better models will have "three attributes: better fit, weighted residuals that are more randomly distributed, and more realistic optimal parameter values." This approach was used by Yager (1996) to test three different model conceptualizations for the Niagara Falls area in New York and by Tiedeman and others (1998) to test six different system conceptualizations of the Albuquerque Basin system. This use of parameter estimation provides a quantitative means (although some subjectivity comes into determining which model is good enough) to test different conceptualizations.

In trial and error calibration, investigators have the ability to continuously change their conceptualization of the system and parameter distributions in order to improve the calibration fit, although the benefits of these changes are frequently difficult to quantify. It is the insight and skill of the investigator during a trial and error calibration that will control how well a model represents the ground-water system under investigation. In evaluating the adequacy of a model calibration, the conceptual model and the insight of the investigators generally are more important than just an evaluation of quantitative measures of goodness of fit.

Questions to be addressed in evaluating the adequacy of calibration of a model using either trial and error or automatic methods are:

1. Is the conceptual model of the system under investigation reasonable?
2. Are the mathematical representations of the boundary conditions reasonable for the objectives of the study?
3. Does the simulated head and flow distribution mimic the important aspects of the flow system, such as magnitude and direction of the head contours?
4. Does some quantitative measure of head and flow differences between the simulated and observed values seem reasonable for the objectives of the investigation?
5. Does the distribution of areas where simulated heads are too high and areas where simulated heads are too low seem randomly distributed? If they are not randomly distributed, then is there a hydrogeologic justification to change the model and make the residuals more random areally?

Just because a model is constructed and calibrated, does not ensure that it is an accurate representation of the system. The appropriateness of the boundaries and the system conceptualization is frequently more important than achieving the smallest differences between simulated and observed heads and flows.

## Model Input Data, Output Listing, and Report Consistency Check

In evaluating the adequacy of a model, the input data, output listing, and report ideally should be compared with each other to ensure that they all represent the same analysis. Depending on the level of evaluation being undertaken, this comparison can vary greatly in its thoroughness. Many times the output listing and input data sets are not available to the person evaluating the model, so there is nothing that can be checked.

If the listing file is available, then it is useful as a minimum to compare some of the model output to information in the report. The simulated water budget in the output listing can be compared to budget values determined from the system conceptualization and real-world measurements provided in the report. For example, if the areal recharge rate is specified in the report, the total recharge over the modeled area can be calculated and compared to the reported recharge in the model budget. Heads or drawdowns in the model output listing can be compared to values in the report.

If a more thorough evaluation is required, then the input data can also be checked. Although it is impossible to ensure that all the preprocessor steps and manual data entry were undertaken correctly, data checking can increase confidence that the model is consistent with the description in the report. Whether the model data files were constructed by manually entering information into files or by using a graphical user interface, there is the possibility that the data files contain errors.

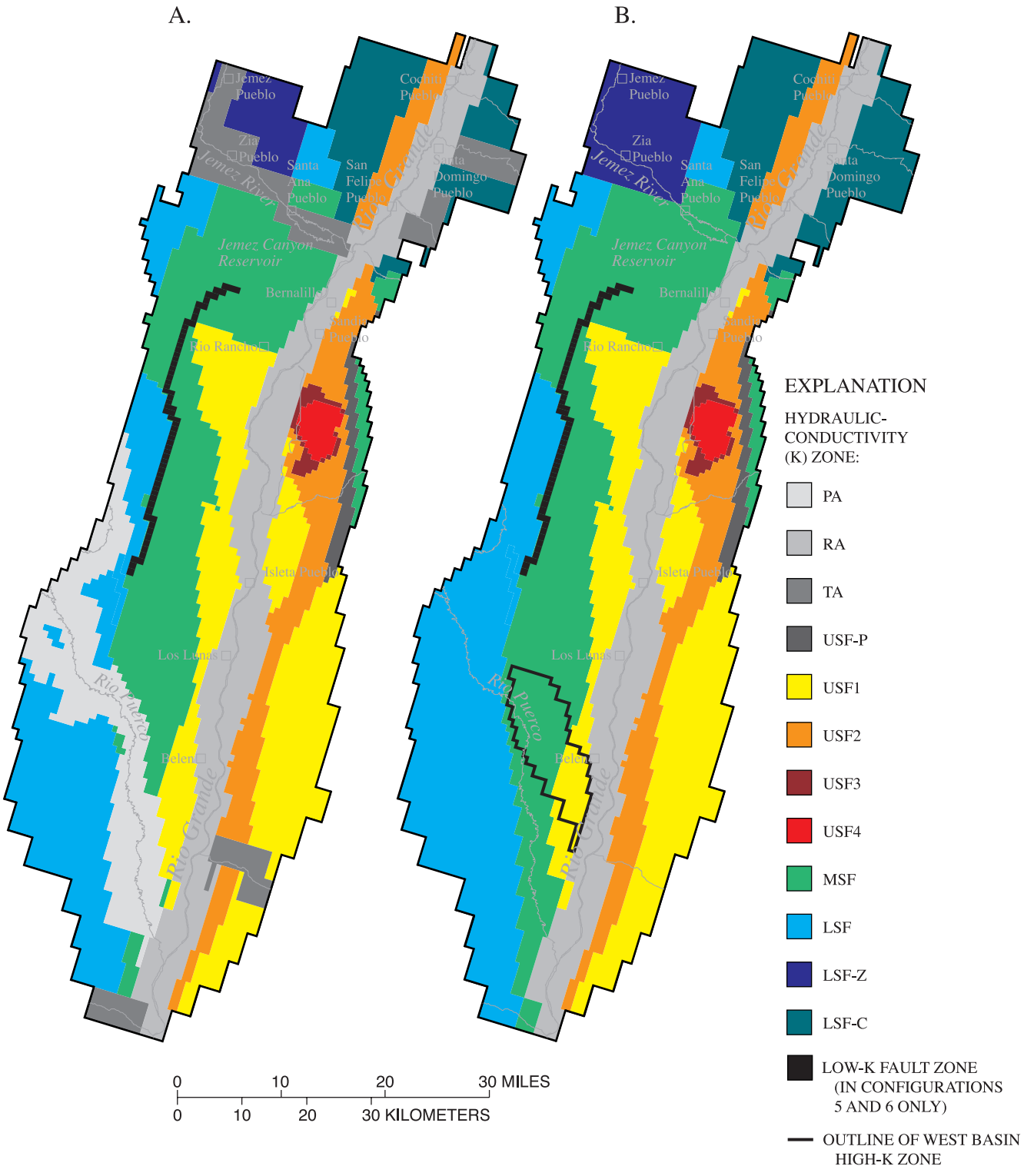


**Figure 18.** Hydraulic-conductivity zones identified for automatic parameter estimation in a ground-water flow model of the Albuquerque Basin, New Mexico: (A) zones in model layer 1, and (B) zones in model layer 2. (From Tiedeman and others, 1998.)

Examples of possible errors are: numbers scaled improperly, inconsistent data, data entered into incorrect fields, data assigned to incorrect cells, typographical errors, and many others. An example of inconsistent data is the use of inconsistent time or space units for different parts of the data. For example, pumping might be entered in cubic feet per second ($ft^3/s$) and hydraulic conductivity in feet per day (ft/d). An example of data assigned to incorrect cells is the specification of stress data, for example pumping wells located in inactive cells.

The extent to which the input data can be checked depends on the size of the model, available resources, and how the data were entered. Typical models vary in size from several thousand cells to over a hundred thousand cells. There are multiple data values per cell, so it is impractical to check every input value in even the smaller models. Thus, data scanning is a better term to describe the data-checking process. If data files are available, then they can be checked or scanned directly. If the output listing is available and if this listing contains an echo of the input data, then usually it is easier to examine the output listing than the input files. Also, seeing the data in the output listing provides added confirmation that the data files have been properly read by the model program.

Some checks that can be considered are:

1. Do the model water-budget quantities seem appropriate for the values described for the actual system in the report?
2. Are the input data the same as those described in the report?
3. Are data values consistent and assigned to appropriate cells?

Checking the information that is read directly by the model increases confidence that the simulation is indeed a solution to the problem described. The level of evaluation required determines the thoroughness of the consistency check that should be undertaken.

## Model Reporting and Archiving

Because models are embodiments of scientific hypotheses, a clear and complete documentation of the model development is required for individuals to understand the hypotheses, to understand the methods used to represent the actual system with a mathematical counterpart, and to determine if the model is sufficiently accurate for the objectives of the investigation. As stated in U.S. Geological Survey Office of Ground Water Technical Memorandum 96.04 (see appendix), there is no rigid checklist or recipe for reporting on the use of simulation in a ground-water study. The appropriate level of documentation will vary depending on the study objectives and the complexity of the simulations. A valuable result of the ground-water modeling effort is the insight gained by the investigator during the modeling process about the functioning of the flow system. This understanding of the flow system gained during the modeling process can be an important product of the study and should be appropriately discussed and documented in the modeling report.

The general structure of a well-constructed report describing simulation is much the same as that for any investigative study. It should present (1) the objectives of the study, (2) a description of the work that was done, (3) logical arguments to convince the reader that the methods and analyses used in the study are valid, and (4) results and conclusions.

Ten specific topics that should be addressed in reports that describe studies in which simulation is used are listed and explained in U.S. Geological Survey Office of Ground Water Technical Memorandum 96.04 to aid individuals in documenting their model studies. These 10 topics are:

1. Describe the purpose of the study and the role that simulation plays in addressing that purpose.
2. Describe the hydrologic system under investigation.
3. Describe the mathematical methods used and their appropriateness to the problem being solved.
4. Describe the hydrogeologic character of the boundary conditions used in the simulation of the system.
5. If the method of simulation involves discretizing the system (finite-difference and finite-element methods for example), describe and justify the discretized network used.
6. Describe the aquifer system properties that are modeled.
7. Describe all the stresses modeled such as pumpage, evapotranspiration from ground water, recharge from infiltration, river stage changes, leakage from other aquifers, and source concentrations in transport models.
8. For transient models, describe the initial conditions that are used in the simulations.
9. If a model is calibrated, present the calibration criteria, procedure, and results.
10. Discuss the limitations of the model's representation of the actual system and the impact those limitations have on the results and conclusions presented in the report.

Once the study is finished, it is always useful to organize and archive the model files. The purpose of the archive is to ensure that the results are reproducible in the future either by the model developer or other interested parties. Thus, the archive should reference any published reports on the model and provide enough explanation in a text "readme" file for the model to be used by others. The archival of the model provides good scientific practice and reproducibility of results.

## Summary

Ground-water models are designed and built to meet specific objectives. Models must be critically evaluated to ensure that there are no data input errors and that the conceptual model does indeed accurately represent the actual ground-water system sufficiently to meet the objectives of the study. The items to be evaluated are: the appropriateness of the model program, the discretization and representation of the geologic framework, the representation of the boundary conditions, the representation of the initial conditions, and the accuracy of the matrix solution.

Ground-water flow models attempt to reproduce, or simulate, the operation of a real ground-water system using a mathematical counterpart (a mathematical model). Thus, the evaluation of the model is intended to ensure that the model program and numerical representation of the important aspects of the system are sufficient to meet the objectives of the study. The guidelines presented in this report raise some of the important aspects of model evaluation.

## Acknowledgments

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# Appendix

April 24, 1996

OFFICE OF GROUND WATER TECHNICAL MEMORANDUM NO. 96.04

Subject: PUBLICATIONS—Policy on documenting the use of ground-water simulation in project reports

It has been more than two decades since Ground Water Branch Technical Memorandum No. 75.11 was released on the subject of documenting the use of ground-water simulation in project reports. Because of the time lapse, changes in modeling techniques, and the frequency of problems found when reports are reviewed, a revisit to policy on this subject is appropriate.

There is no rigid checklist or recipe for reporting on the use of simulation in a ground-water study. The appropriate level of documentation will vary depending on the project objectives and the complexity of the simulations. The general structure of a well-constructed report describing simulation is much the same as that for any investigative study. It should present (1) the objectives of the study, (2) a description of the work that was done, (3) logical arguments to convince the reader that the methods and analyses used in the study are valid, and (4) results and conclusions.

Specific topics that should be addressed in reports that describe studies in which simulation is used include the following.

1. Describe the purpose of the study and the role that simulation plays in addressing that purpose.

   The objective of the simulation must be clearly stated. The model should be represented as a tool to help solve specific problems or answer specific questions rather than as an end product.

2. Describe the hydrologic system under investigation.

   The extent, nature of boundaries, transmitting properties, storage properties, sources of water, discharge mechanisms and other relevant components of the ground-water system should be described as known or conceptualized. Usually this can be accomplished in part by referencing previous works, but major relevant system characteristics should be summarized in the report that describes the simulation.

3. Describe the mathematical methods used and their appropriateness to the problem being solved.

   In most cases, a reference to a readily available publication will be sufficient to document mathematical details; however, it will usually be desirable to briefly summarize the methods that are used. For a well-documented computer program, this will often require only a paragraph or two. If a documented computer program is modified such that computed values are affected, the modifications should be documented and evidence that the modifications are correct should be supplied.

4. Describe the hydrogeologic character of the boundary conditions used in the simulation of the system.

   In many cases, the model boundaries are placed where the aquifer terminates against relatively impermeable rocks or is intersected by a perennial stream whose head variation in time and space is known. In other cases, the aquifer may be so extensive relative to the area of interest that the modeled area may need to extend beyond the project area to accurately simulate the natural boundaries of the aquifer system. If the modeled area is arbitrarily truncated at some distance from the area of interest, it should be shown that the selection of the arbitrary boundary condition does not materially affect the ability of the model to simulate the system for the purposes of the study. Internal boundaries such as streams, lakes, and pinchouts of important hydrogeologic zones should be identified and their representation in the model should be described in the report. A clear, convincing argument of the appropriateness of the boundary conditions used in the model to represent the actual system should be made for the entire bounding surface of the modeled volume or cross section, as well as for any internal boundaries.

5. If the method of simulation involves discretizing the system (finite-difference and finite-element methods for example), describe and justify the discretized network used.

   The spacing and distribution of the blocks, elements, or subregions should reflect, in part, the spatial variability of the hydraulic parameters and the location of boundaries (for example streams, lakes, bed pinchouts), human-made features (for example wells and dams), and stresses. In most cases, a map showing the discretized network superimposed on the study area is required. Vertical discretization should be described and/or shown on illustrations. The manner in which time is discretized for transient models also should be described. If a steady-state model is used to simulate an average or approximate steady-state condition, discuss the errors that could be introduced in the study results as a consequence of using a steady-state model.

6. Describe the aquifer system properties that are modeled.

   Explain whatever inferences are made from field data and previous studies as to the spatial variation of hydraulic properties of aquifers and confining beds and how discretized values are computed throughout the simulated area. During model calibration (see item 9), modeled values are often changed; the final aquifer

system properties that are modeled should be described in the report. This can be through maps or descriptions in the text. Lists of model arrays do not generally provide much understanding of the model and accordingly should not be included in the report unless it is expected that readers will want to repeat the simulations. If lists of arrays are included, they should usually be provided on electronic media. Note that Office of Ground Water Technical Memorandum No. 93.01 describes the separate requirement for archiving the complete model data sets used in ground-water projects.

7. Describe all the stresses modeled such as pumpage, evapotranspiration from ground water, recharge from infiltration, river stage changes, leakage from other aquifers, and source concentrations in transport models.

   The relations between observed and modeled stresses should be described. For example, it usually is desirable to provide a representative sample of actual pumping histories and the corresponding modeled pumping histories, although such information would not necessarily be provided for every pumped well. The manner in which stresses are averaged within the discretized time and space scheme should also be described. If a steady-state model is used to simulate an average or approximate steady-state condition, describe how the average stresses representing this system are calculated.

8. For transient models, describe the initial conditions that are used in the simulations.

   Ideally, a transient simulation will start from a steady-state condition, and the steady-state initial conditions will be generated by a steady-state simulation using the same model. In this case, the steady-state simulation must use the same hydraulic and stress parameters that are used in the transient simulation, except that the transient stresses are removed. In situations where it is not possible to start a transient model from a simulated steady-state condition, it is necessary to describe how the initial conditions were derived. It is also important to estimate the error in the derived values and the possible impact on the model results.

9. If a model is calibrated, present the calibration criteria, procedure, and results.

   Describe the source of the observed data to which model results are compared. Explain the appropriateness of using these data for model comparisons and the rationale for any adjustments made to actual observations when making the comparisons. For example, when steady-state models are used to simulate an approximate steady-state condition, it is important to explain to what extent the observations that have been made at specific points in time correspond to the approximate steady-state condition being simulated. Give a representative sample of the actual comparisons used for calibration, and show the locations of the observation points on maps. When the number of observations is extensive, locations of representative points can be shown. It is important to report and use as many types of data as possible for calibration. For example, in a flow model, both head and flow observations are desirable for use in calibration.

10. Discuss the limitations of the model's representation of the actual system and the impact those limitations have on the results and conclusions presented in the report.

    Evaluating the sensitivity of the computed model responses to changes in parameter values that reflect plausible parameter uncertainty helps to assess the model reliability. If the model is to be used to make specific projections, it is useful to estimate the impacts of the uncertainty of parameter values on the projections. In calibrated models, a concern is nonuniqueness, which is the extent to which other combinations of parameter values or configurations may result in an equally good fit to the observed data. Discuss the extent to which nonuniqueness may affect the use of the model in the study.

In summary, a report describing a study in which simulation is used should address the above topics; however, there is considerable flexibility in the form of such a report. The report should describe the purpose of the simulation and convince the reader that the use of simulation is credible. The report should further describe the system being simulated, the methods of simulation, and the data that are used.

William M. Alley
Chief, Office of Ground Water

Distribution: A, B, S, FO, PO

This memorandum supersedes Ground Water Branch Technical Memorandum No. 75.11

# U.S. Department of the Interior
# Bureau of Land Management

## Environmental Assessment

**DOI-BLM-CA-D060-2023-0010-EA**

# Easley Renewable Energy Project

**August 2024**

**Preparing Office:**

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**TABLES**



**FIGURES (Appendix A: Maps and Figures)**

**APPENDICES**

# 1.0 INTRODUCTION

## 1.1 Introduction

The Bureau of Land Management (BLM) has prepared this Environmental Assessment (EA) pursuant to the National Environmental Policy Act of 1969 (NEPA, 42 U.S.C. Section 4321), Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations [CFR] Parts 1500–1508),[1] Department of the Interior NEPA Regulations (43 CFR Part 46), and BLM NEPA Handbook H-1790-1, for the Easley Renewable Energy Project (Easley Project or Project) proposed by IP Easley, LLC (the Applicant), a subsidiary of Intersect Power, LLC.

This EA evaluates the environmental effects of constructing, operating, maintaining, and decommissioning Intersect Power's Easley Renewable Energy Project, a 400-megawatt (MW) solar photovoltaic (PV) project in Riverside County, California (see Figure 1-1, Project Vicinity in EA App. A). This project includes a 650 MW battery energy storage system (BESS), access roads, and other appurtenant facilities. A 6.7-mile 500 kilovolt (kV) generation-tie (gen-tie) line would connect to the power grid, mainly traversing across the Oberon Renewable Energy Project site that is located to the south and adjacent to the Easley Project site, and then connecting to the existing Oberon substation on the Oberon Project site, owned by Intersect Power Company. From the Oberon onsite substation, the project's generated power would be transmitted to the Southern California Edison (SCE) Red Bluff Substation via the existing Oberon 500 kV gen-tie line. All figures referenced in this EA are provided in EA Appendix A. A summary of consultation/coordination and a list of preparers of the EA is included in Appendix B.

Public lands within the Project solar application area are lands designated as a Development Focus Area (DFA) under BLM's Desert Renewable Energy Conservation Plan (DRECP) and associated Record of Decision (ROD), and thus, have been targeted for renewable energy development (BLM, 2016a). Because the proposed Project is partially located on federal land under management of the BLM, the BLM is the lead federal agency under NEPA.

Depending on the timing of the interconnection agreement, the Easley Project could be operational as early as late 2025. The Project would operate for a minimum of 35 years and up to 50 years. At the end of its useful life, the Project would be decommissioned, and the land returned to its pre-Project conditions.

### 1.1.1 Background on BLM Filings and Agency Roles and Responsibilities

Several of the Easley parcels were included in BLM's Standard Form (SF-299) application and amendments by Aurora Solar, LLC, Starlight 2020, LLC, and IP Oberon, LLC, between November 2017 to February 2021. In June 2021 and January 2022, an SF-299 and an amendment were submitted to BLM to add additional land and officially change the project name to the Easley Renewable Energy Project. BLM updated the project serial number to CACA-106049952. With the amendment, the total project area then totaled 10,160 acres, of which 8,338 acres were BLM-administered land and 1,822 acres were private lands. In July 2022, IP Easley, LLC, submitted another SF-299 amendment removing 3,847 acres of BLM-administered public lands from the Project application area. The BLM lands removed were primarily the eastern and central parcels where solar development would have been inconsistent with the DRECP, the applicable BLM land use plan for this area, and mainly with identified Conservation Management Actions (CMAs) identified in the plan. The Proposed Action described herein now includes 2,745 acres of BLM lands and 990 acres of private lands.

The BLM is preparing this EA as the lead agency under the NEPA. The County of Riverside is preparing a separate Environmental Impact Report (EIR) as the lead agency responsible for environmental review of

[1] The CEQ regulations implementing NEPA were updated in 2020, and again in 2024, including changes to 40 CFR 1500.1. Because the NEPA process leading to this EA began with submittal of an application to BLM on September 5, 2019, this EA has been completed under the NEPA regulations in place prior to the 2020 and 2024 updates. *See* 40 CFR 1506.12 (2024); 40 CFR 1506.13 (2020).

the project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code section 21000 et seq.

### 1.1.2 Desert Renewable Energy Conservation Plan

This EA tiers to the DRECP Final Environmental Impact Statement (FEIS) (BLM, 2016) as described in Section 1.5, Tiering and Incorporation by Reference. The DRECP is a collaborative, interagency landscape-scale planning effort covering 22.5 million acres in seven California counties—Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino, and San Diego. The DRECP has two primary goals. One is to provide a streamlined process for the development of utility-scale renewable energy generation and transmission in the deserts of southern California consistent with federal and state renewable energy targets and policies. The other is to provide for the long-term conservation and management of special-status species and desert vegetation communities, as well as other physical, cultural, scenic, and social resources within the DRECP Plan Area using durable regulatory mechanisms. DRECP planning decisions are "…*designed to both provide effective protection and conservation of important desert ecosystems, while also facilitating the development of solar, wind and geothermal energy projects in those unique landscapes*." The DRECP Land Use Plan Amendment (LUPA) and supporting FEIS identified lands within the California desert that would be appropriate for conservation and lands that would be appropriate for renewable energy development, called Development Focus Areas (DFA) (BLM, 2016). The FEIS supporting the DRECP Record of Decision (ROD) comprehensively evaluated utility-scale renewable energy development in the California Desert including the East Riverside DFA, where the Project is located. The FEIS considered impacts to all resources potentially impacted by renewable development and included CMAs designed to reduce the effects of development on sensitive resources as well as highlighting other types of mitigation that might be required to further reduce impacts (BLM, 2016).

When evaluating the Project in this EA, if the BLM determines that the project or an alternative would result in any new significant impact not disclosed in the DRECP FEIS, the BLM will prepare a project-specific EIS before authorizing the Project. If the BLM determines there are no new significant impacts, then the BLM expects to issue a Finding of No New Significant Impact (FONNSI) documenting the reasons why implementation of the selected alternative would not result in significant environmental impacts that were not previously analyzed and disclosed in the DRECP FEIS. As described in EA Chapter 3, the BLM found that the conditions and environmental effects described in the DRECP FEIS are still valid and this EA addresses any exceptions (43 CFR § 46.140). The BLM has determined that private lands will be covered under the Section 7 consultation process. In addition, the project proponent has committed to complying with the CMAs on both public and private lands.

## 1.2 Project Location

The project would be located in the central part of the Chuckwalla Valley in Riverside County, approximately 2 miles north of Interstate 10 (I-10) and the town of Desert Center, and near the community of Lake Tamarisk. The Project's solar PV panels and appurtenant facilities would be constructed on approximately 2,745 acres of public land administered by BLM in addition to approximately 990 acres of private land within the jurisdiction of the County of Riverside. A 6.7-mile 500 kV gen-tie line would traverse in a southwesterly direction and adjacent to State Route 177 for approximately 1.5 miles and then traverse east across the Oberon Project site for approximately 5.2 miles and connect into an approved substation on public lands within the Oberon Renewable Energy Project site. From the Oberon substation, the power generated by the Easley Project would be transmitted to the SCE Red Bluff Substation via the Oberon 500 kV gen-tie line. BLM-administered land for the Project is within BLM's California Desert Conservation Area (CDCA) Planning Area and within a DFA designated by the DRECP LUPA.

Figure 1-1, Project Vicinity (EA App. A) illustrates the location of the Project and its relationship to major highways, access roads, and communities. Figure 1-2, Project Area (EA App. A) shows the Project area and the gen-tie line. Figure 1-3 (EA, App. A) shows the Proposed Project's solar panel, substation, and BESS layout. Nearby land uses include previously developed or developing solar facilities, transmission

lines, fallow and active agriculture, and residences, both rural and within Lake Tamarisk. The private parcels consist of primarily manmade features that include aquaculture, deciduous orchard/ fallow agriculture or developed areas.

The existing Desert Sunlight and Desert Harvest solar projects are north of the proposed Project and Athos Renewable Energy Project is located to the east. The Oberon Renewable Energy Project, and the Arica, Victory Pass and Palen Solar Projects are located to the southeast. The Sapphire Solar Project, proposed by EDF Renewables, is adjacent to the northern portion of the Easley Project. Figure 1-4, Desert Center Solar Projects & DRECP Context (EA, App. A), shows the proposed Easley Project in relation to other existing, approved, and proposed solar facilities in eastern Riverside County and illustrates the proposed consolidation of the gen-tie corridors.

Except for the eastern portion of the gen-tie line, the Project site is outside of, but in proximity to, desert tortoise critical habitat and the Desert Wildlife Management Area (DWMA). Both the Alligator Rock and Chuckwalla Areas of Critical Environmental Concern (ACEC) are less than 3 miles south and the closest Joshua Tree National Park boundary is located approximately 4 miles northeast of the Project site. The Project site includes a desert tortoise linkage area as defined in the DRECP (the Pinto Wash Linkage). The Project is situated within the Desert Center, Victory Pass, East of Victory Pass, and Corn Spring 7.5 USGS topographic quadrangles.

Ground surface elevations at the project range from approximately 800 feet above mean sea level (amsl) in the southwest portion of the site and 550 feet amsl in the northeast portion of the site. The topography of the project site slopes downward toward the northeast at a gradient of less than 1 percent. The surrounding mountain elevations range from over 3,000 feet amsl (Palen Mountains within the Palen/McCoy Wilderness to the east of the project) to over 5,000 feet amsl (Eagle Mountains within Joshua Tree National Park to the west of the project). Vegetation within the project area is mostly creosote bush scrub with other natural communities intermixed. One vegetation community (desert dry wash woodland) is identified by BLM and the California Department of Fish and Wildlife (CDFW) as sensitive.

## 1.3 Purpose and Need

### 1.3.1 BLM's Purpose and Need

The BLM's purpose is to respond to the IP Easley, LLC, a subsidiary of Intersect Power, LLC, request under Title V of the Federal Land Policy and Management Act of 1976 (FLPMA) (43 U.S.C. Section 1761(a)(4)) for a right-of-way (ROW) grant to construct, operate, maintain, and decommission a solar PV electric generating and energy storage facility and appurtenant facilities on public lands. In responding to the application, BLM must consider BLM's multiple-use mandate, and comply with FLPMA, the BLM ROW regulations, the Energy Act of 2020 [Consolidated Appropriations Act of 2021, Division Z, TITLE III, Subtitle B, Section 3104, 116 P.L. 260, 134 Stat. 1182 (December 27, 2020), now codified at 43 U.S.C. § 3001 et seq.], and other applicable federal laws, as well as the need to promote certain policy objectives, including Executive Order 14008, described below.

Executive Order 14008 dated January 27, 2021, "Tackling the Climate Crisis at Home and Abroad" directs the Secretary of the Interior to identify steps that can be taken to increase renewable energy production on public lands and manage federal lands to support robust climate action while ensuring protection for our lands, waters, and biodiversity (see sections 204 and 207). Furthermore, this Project would contribute to California State Senate Bill 100 that requires a 60 percent renewable energy portfolio standard by 2030 and sets a 100% clean, zero carbon, and renewable energy policy for California's electricity system by 2045.

The need for this action is established by the BLM's responsibility under Section 501(a)(4) of FLPMA, which authorizes the BLM to issue ROW grants on public lands for systems for generation, transmission, and distribution of electric energy.

### 1.3.2 Decision to be Made by BLM

The BLM Authorized Officer will review the Proposed Action (described in Section 2.3 as Alternative 2) and other alternatives and decide whether to deny the Applicant's application, approve the application, or approve the application with modifications. The BLM may include any terms, conditions, and stipulations it determines to be in the public interest and may modify the proposed use or change the route or location of the proposed facilities (43 CFR 2805.10(b)(1)). This decision will be an implementation decision.

## 1.4 Scoping and Issues

### 1.4.1 Issues Analyzed in Detail

BLM has considered input received during internal and external scoping under NEPA, as well as during review of site-specific issues and resources affected. The BLM held a NEPA public scoping meeting on October 4, 2023. This section summarizes the verbal and written comments received from the public and agencies during the scoping period for the proposed Project. Applicable scoping comments for each issue or resource area are addressed in EA Section 3 for the issues or resource areas analyzed in detail. The scoping comments were evaluated for each issue or resource area identified through the scoping process and are summarized below in Table 1-1. The scoping comments are included in detail in EA Appendix C (Scoping Report).

**Table 1-1. Summary of Scoping Comments for Issue Areas Analyzed in Detail**

| Scoping Issue Area Comments | EA Section Addressed |
|---|---|
| **Air Quality and Greenhouse Gas Emissions** | |
| Use of dust monitoring equipment to address health concerns | Section 3.2.3 |
| Inclusion of a Dust Control Plan and address potential air quality violations during construction | Section 3.2.3 |
| **Noise and Vibration** | |
| Potential impacts from construction noise and activities to exceed local noise ordinances | Section 3.3.3 |
| **Vegetation and Wildlife Resources** | |
| Minimization of surface disturbance during project construction and preserving natural vegetation and soils | Section 3.4.3 |
| Assess the risk of increased bird fatalities and wildlife impacts due to the solar panels and project construction and operation | Section 3.4.3 |
| Assess the use of wildlife-friendly fencing | Section 3.4.3 |
| Protection, preservation, and monitoring of the Mojave Desert tortoise | Section 3.4.3 |
| **Visual Resources** | |
| Preserving dark skies near Joshua Tree National Park | Section 3.5.3 |
| Visual impacts from the proximity of solar infrastructure, fencing, and gen-tie line to the Lake Tamarisk Desert Resort community | Section 3.5.3 |
| Potential impacts from glint and glare | Section 3.5.3 |
| **Water Resources** | |
| Estimate project water usage during construction and operation, including impacts on local water users and resources | Section 3.6.3 |
| Potential impacts on the Colorado River Aqueduct (CRA) and associated facilities | Section 3.6.3 |
| Placement of solar panels to minimize potential erosion and hydrological impacts | Section 3.6.3 |
| Potential impacts on the Eagle Mountain Pumping Plant and the Hinds Pumping Plant | Section 3.6.3 |
| Potential impacts for flooding due to stormwater runoff | Section 3.6.3 |

| Scoping Issue Area Comments | EA Section Addressed |
|---|---|
| **Alternatives** | |
| Evaluate alternatives that would minimize effects on desert dry wash woodland | Section 2.3, 3.4.3 |
| Provide a minimum buffer distance from Lake Tamarisk community | Section 2.4, 2.5 |
| Evaluate development footprint that would avoid wildlife habitat | Section 2.3, 3.4.3 |

Table 1-2 lists the agencies, organizations, and tribes that provided written scoping comments. Additional comments were received from numerous individuals.

**Table 1-2. Agencies, Organizations, and Tribes Providing Scoping Comments**

| Commenter | Date |
|---|---|
| **Agencies** | |
| U.S. Environmental Protection Agency | 10/23/2023 |
| U.S. Fish & Wildlife Service | 10/03/2023 |
| The Metropolitan Water District of Southern California | 10/23/2023 |
| **Organizations** | |
| Basin and Range Watch | 10/23/2023 |
| California Native Plant Society | 10/23/2023 |
| Center for Biological Diversity | 10/20/2023<br>10/23/2023 |
| Chuckwalla Valley Raceway/Association | 10/04/2023<br>10/22/2023 |
| Defenders of Wildlife | 10/03/2023 |
| Desert Tortoise Council | 10/23/2023 |
| International Brotherhood of Electrical Workers Local Union 440 | 10/19/2023 |
| Intersect Power | 10/23/2023 |
| Lake Tamarisk Desert Resort | 10/22/2023 |
| Morongo Basin Conservation Association | 10/23/2023 |
| **Tribal Governments** | |
| Colorado River Indian Tribes | 10/13/2023 |
| **Public** | **Various** |
| Public Comments Received | Various dates |

### 1.4.2 Issues Eliminated from Detailed Analysis

Based on internal and external scoping and public and Tribal comments, 100 additional issues were identified. These issues were consolidated into eight relevant issue or resource area groupings and evaluated, but not analyzed in detail, and are listed in Appendix D (Issues Considered but Not Analyzed in Detail) along with the rationale for not providing a detailed analysis of each issue or resource area. Largely, issues were dismissed from detailed analysis based on incorporation and compliance with the CMAs deemed applicable to the Project and associated mitigation measures that minimize and/or eliminate potential effects from the Proposed Action (see Appendix F, Mitigation Measures and Construction Management Actions).

## 1.5 Tiering and Incorporation by Reference

This EA tiers to the following environmental impact statements completed at the BLM state or national level.

**2016 DRECP Final Environmental Impact Statement (FEIS)/Record of Decision (ROD)/Land Use Plan Amendment (LUPA)**. This EA tiers to the 2016 DRECP FEIS/ROD/LUPA (BLM, 2016), hereafter referred to as the DRECP. As described in Section 1.1.2, the DRECP analyzed the impacts of constructing, operating, and decommissioning solar projects throughout the CDCA and in the DFA in eastern Riverside County where the project is located. BLM's objectives for the DRECP, as reflected in the LUPA are to:

- Conserve biological, physical, cultural, social, and scenic resources.
- Promote renewable energy and transmission development, consistent with federal renewable energy and transmission goals and policies, in consideration of state renewable energy targets.
- Comply with all applicable federal laws, including the BLM's obligation to manage the public lands consistent with the FLPMA's multiple-use and sustained yield principles, unless otherwise specified by law.
- Comply with Congressional direction regarding management of the CDCA in Section 601 of FLPMA, including to "[p]reserve the unique and irreplaceable resources, including archaeological values, and conserve the use of the economic resources" of the CDCA (FLPMA 601[a][6]; 43 United States Code [U.S.C.]1781(a)(6)).
- Identify and incorporate public lands managed for conservation purposes within the CDCA as components of the National Landscape Conservation System (NLCS), consistent with the Omnibus Public Land Management Act of 2009 (Public Law 11111) ("Omnibus Act").
- Amend land use plans consistent with the criteria in FLPMA and the CDCA Plan.
- Coordinate planning and management activities with other federal, state, local, and tribal planning, and management programs by considering the policies of approved land resource management programs.
- Ensure that the BLM land use plan is consistent with state and local plans to the maximum extent consistent with federal law.
- Make some land use allocation decisions outside the DRECP area but within the CDCA, including Visual Resource Management Classes, land use allocations to replace multiple use classes, and NLCS designations.

The DRECP FEIS considered impacts to all resources potentially impacted by renewable development. The FEIS included CMAs designed to reduce the effects of development on sensitive resources and highlighted other types of mitigation that might be required to further reduce impacts. The DRECP FEIS analyzed the types of direct, indirect, and cumulative effects caused by solar development, including on sensitive habitats such as those found in the project site. Appendix C to the Plan of Development (POD), included in EA Appendix E, reviewed all applicable CMAs, and discussed how the Proposed Action and alternatives would comply with each (IP Easley, 2023).

**2009 Westwide Energy Corridor (WWEC) Final Programmatic Environmental Impact Statement (PEIS) and Record of Decision**. The WWEC PEIS evaluated potential impacts associated with the proposed action to designate corridors on federal land in eleven Western States (Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming) for oil, gas and hydrogen pipelines and electricity transmission and distribution facilities (BLM, 2008). The BLM and USFS signed RODs in January 2009 amending their respective land use plans and designating Section 368 energy corridors as the preferred location for development of energy transport projects on lands managed by the BLM and USFS. The RODs also identified interagency operating procedures to expedite the permitting process; to provide coordinated, consistent interagency management procedures for permitting ROWs within the corridors; and to identify mandatory requirements for future projects.

Most of the Easley gen-tie line would be sited within Section 368 Federal Energy Corridor 30-52 designated by the WWEC Final PEIS (BLM, 2008) and ROD.

**2007 and 2016 BLM Final Vegetation Treatments PEIS/RODs in 17 Western States**. This EA also tiers to the 2007 *Vegetation Treatments Using Herbicide on Bureau of Land Management Lands in 17 Western States Final PEIS*, as well as the 2016 *Final Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States*. The 2007 Final Vegetation Treatments PEIS and ROD analyzed the effects from 14 herbicide active ingredients that were identified by the BLM as effective in treating certain types of vegetation. The 2016 Final Vegetation Treatments PEIS and ROD incorporated the 2007 PEIS by reference and analyzed an additional three herbicide active ingredients. These two documents address a wide range of issues, including the effect of these herbicides on the health of humans, vegetation, fish and wildlife, livestock, and wild horses and burros and also consider water quality and Native American use of resources and evaluate the cumulative impact of herbicide use by the BLM and other landowners in the West.

The 2007 Final PEIS ROD included Standard Operating Procedures (SOPs) associated with chemical control applications (BLM, 2007a). SOPs are the management controls and performance standards required for vegetation management treatments. These practices are intended to protect and enhance natural resources that could be affected by future vegetation treatments. The SOPs are listed in EA Appendix H and are incorporated by reference. These SOPs will be followed to ensure that risks to human health and the environment from herbicide treatment actions will be kept to a minimum.

In addition to SOPs, the 2007 PEIS ROD identified mitigation measures to avoid potential adverse environmental effects caused by vegetation treatment activities using herbicides (BLM, 2007b). These measures are also incorporated by reference. The SOPs and mitigation measures ensure that all practicable means to avoid or minimize environmental harm have been adopted by the BLM.

SOPs noted by the PEIS for managing noxious weeds and invasive plants include, but are not limited to, the following:

- Take actions to prevent or minimize the need for vegetation control, whenever and wherever feasible, considering the management objectives of the site.
- Use effective nonchemical methods of vegetation control wherever feasible.
- Use herbicides only after considering the effectiveness of all other potential methods.

The PEIS considered several management objectives when determining appropriate treatment of an infestation:

- Containment to prevent weed spread from moving beyond the current infestation perimeter
- Control to reduce the extent and density of a target weed
- Eradication to completely eliminate the weed species including reproductive propagules (this is usually only possible with small infestations); and
- Restoration of native plant communities and habitats using native species that are adapted to the project site to compete with invasives.

Through this process, the BLM has approved the use of various herbicides in 17-western states (BLM, 2007b). Information Bulletin No. 2017-078 (BLM, 2017) provides instructions for implementing the Final Programmatic Environmental Impact Statement Using Aminopyralid, Fluroxypyr, and Rimsulfuron on the Bureau of Land Management Lands in 17 Western States.

## 1.6 Conformance with Land Use Plans, Laws, Regulations, and Policies

The Project would comply with all applicable statutes and regulations. The regulatory framework relevant to the various resource areas affected by the project is identified in EA Appendix G.

The solar PV facility site and integrated battery storage system, as well as associated electrical infrastructure, are located on BLM-administered public lands within a DFA designated by the DRECP LUPA (DRECP; 2016). The DRECP amended the CDCA Plan to allow for development of solar energy generation and appurtenant facilities on public lands in this specific area as part of a DFA. Consistent with the DFA definition, the project area has been designated under FLPMA as suitable for renewable energy development and energy accessory uses.

BLM evaluated whether the Proposed Action complies with the DRECP CMAs, including consideration of additional information (see POD Appendix C included in EA Appendix E). The Proposed Action (Alternative 2) and Alternatives 3. Reduced Acreage and 4. Community Buffer, comply with the CMAs identified in the DRECP LUPA, as summarized in EA Appendix F for full discussion.

Most of the Easley Project 500 kilovolt (kV) gen-tie line would be separate but collocated within the Oberon 500 kV gen-tie line ROW that is within the Section 368 Federal Energy Corridor 30-52, as established by the WWEC PEIS and ROD (2009). This PEIS and ROD amended BLM land use plans to establish utility corridors for electrical transmission and other utility infrastructure throughout the western states. Corridor 30-52 was not identified as a corridor of concern (see also POD Appendix E, Right-of-Way, and Utility Corridor Conflict Analysis, included in EA Appendix E). Therefore, the project would comply with the WWEC ROD.

In addition to the CDCA, as amended, and WWEC Plans, the Northern and Eastern Colorado Desert Coordinated Management (NECO) Plan also amended the CDCA Plan and includes management of travel routes within the project area. The project would close BLM open routes but would not preclude travel through the area because there are multiple redundant routes in the area, and therefore, would be compatible with the NECO Plan amendments and DRECP CMAs (EA Appendix A, Fig. 1-5).

# 2.0 ALTERNATIVES

The Applicant proposes to construct, operate, maintain, and decommission the Easley Renewable Energy Project, which would consist of a 400 MW solar PV electricity generating station, battery energy storage system, electrical collector lines and substation, gen-tie line, and associated access roads, on BLM-managed and private land near Desert Center, Riverside County, California. Pursuant to 43 CFR §§ 2805.15(b) and 2805.14(b), the BLM may require other ROW holders to collocate with the Oberon solar facilities.

For solar energy development facilities, the BLM may issue a ROW grant for up to 50-years, plus the initial partial year of issuance (43 CFR § 2801.9(d)(3)). At that time, the project owner may apply to the BLM to renew the ROW grant for an additional period of time. At the end of the project's useful life, or at the end of the ROW grant, if it is not renewed, the solar facility and associated components would be decommissioned, and the land returned to its pre-project contours. The Applicant would reclaim and revegetate the project area pursuant to POD Appendix Y: Closure, Decommissioning, and Reclamation Plan (in EA Appendix E) that outlines Site reclamation goals and success standards (Section 5.1). These standards require that total vegetative cover and relative cover of native to nonnative plant species within restored lands be similar to that observed in reference areas in the immediate site vicinity and that the soil surface is stabilized to reduce dust and erosion to a degree at or below natural background levels and that reduces cover of nonnative plants. The plan identifies revegetation measures, supplemental seeding, and plant species selection. Monitoring and maintenance would be required until success standards are met.

Various ROWs have been granted to other developers or are pending within portions of the proposed BLM ROW for the project, as detailed in EA Chapter 3.1 (see Figure 1-4, Desert Center Solar Projects & DRECP Context in EA, App. A). BLM has notified the other holders of ROWs in the area of the Easley application

that might affect their existing ROW, and BLM will consider the recommendations from the other holders (43 CFR § 2807.14). The Applicant will also work closely with other ROW holders and applicants in the area, in coordination with BLM staff, to consolidate ROWs and minimize and avoid conflicts to the extent commercially feasible (see POD Appendix D included in EA Appendix E).

## 2.1 Background

The total project area originally proposed totaled 10,160 acres, of which 8,338 acres were BLM-administered land and 1,822 acres were private lands. In July 2022, IP Easley, LLC, submitted an updated SF-299 removing 3,847 acres of BLM-administered public lands from the Project application area. The BLM lands removed were primarily the eastern and central parcels, which included the following resources:

- Aeolian sands comprising the northern half of central parcel and entire eastern parcel; thereby impacting design of the Project site since sand movement must be considered (CMAs DFA-VPL-BIO-DUNE-1 and DFA-VPL-BIO-DUNE-2).
- Potential for two rare plants of concern located within aeolian sands: chapparal sand verbena (*Abronia aillosa var aurita*) and Harwood's wooly aster (*Eriastrum harwoodii*) requiring 0.25-mile avoidance setback (CMA LUPA-BIO-PLANT-2).
- High occupancy of Mojave fringe-toed lizard within the active aeolian sand areas (CMA LUPA-BIO-DUNE-4 & 5).
- Desert dry wash woodland on southern half of central parcels requiring 200-foot avoidance setback (CMAs LUPA-BIO-RIPWET-1 and LUPA-BIO-13).
- Potential cultural resources sensitivity.

The parcels removed from the original project footprint were in areas where the identified CMAs could not be met. The Proposed Action described herein now includes 2,745 acres of BLM lands and 990 acres of private lands, totalling 3,735 acres.

As part of the DRECP, CMAs LUPA-BIO-RIPWET-1, LUPA-BIO-SVF-6, and LUPA-BIO-3 require solar energy development projects to avoid these described habitats to the maximum extent practicable, with a specified setback of 200 feet under CMA LUPA-BIO-RIPWET-1. According to the DRECP LUPA glossary, "maximum extent practicable" means that "implementation of the CMA is required unless there is no reasonable or practicable means of doing so that is consistent with the basic objectives of the activity." The Applicant refined the development footprint of the Proposed Action to avoid desert dry wash woodland areas by incorporating a minimum 200-foot setback between these areas and the nearest solar panels.

## 2.2 Alternative 1: No Action

Under Alternative 1, the No Action Alternative, the BLM Authorized Officer would deny the Applicant's ROW application in accordance with BLM regulations at Title 43 CFR §2804.26. Construction of a solar generating and integrated energy storage facility and associated infrastructure, including the 500 kV gen-tie line, and upgrades by SCE to Red Bluff Substation would not occur.

The No Action Alternative considers what would be reasonably expected to occur in the foreseeable future if the proposed Project is not approved and does not take place. The BLM would continue to manage the land under its current plan as a DFA and the land would be available for future solar applications.

## 2.3 Alternative 2: Proposed Action

The Proposed Action (EA App. A, Figure 1-3) would involve the construction and operation of a solar and energy storage facility on 990 acres of private land and 2,745 acres of BLM-administered lands. The Project would include a 400 MW solar photovoltaic electricity generation station, battery energy storage system,

electrical collector lines, on-site substations, access roads, operations and maintenance building, and security fencing. A 6.7-mile 500 kV generation-tie line would connect to the power grid, mainly traversing across the Oberon Renewable Energy Project site located to the south and adjacent to the Easley Project, and then connecting to the existing Oberon substation. From there, generated power would be transmitted to the SCE Red Bluff Substation via the existing Oberon 500 kV gen-tie line.

Except for minor incursions[2] by gen-tie and collector lines and access roadways, the Proposed Action would avoid desert dry wash woodland with a 200-foot buffer, relocating some panels into a designated utility corridor and arranging the PV arrays to avoid these areas. Access roads remaining in buffer areas would have limited use.

## 2.4 Alternative 3: Reduced Acreage

The Reduced Acreage Alternative (EA App. A, Figure 2-9), similar to the Proposed Action, would remove approximately 50-acres of solar panels in two locations closest to the Lake Tamarisk community. A 30-acre collection of solar arrays would be removed located northeast of the Lake Tamarisk Desert Resort, and an additional 20-acre collection of arrays would be removed directly north of Lake Tamarisk. With this reduction, solar panels would be approximately 2,350 feet (0.45 miles) from the northeast corner of the Lake Tamarisk Desert Resort community compared to 750 feet (0.14 miles) under the Proposed Action. In addition, removal of the 20 acres of solar arrays would result in solar arrays being approximately 3,696 feet (0.7 miles) from the north end of Lake Tamarisk compared to 2,640 feet (0.5 miles) under the Proposed Action. The electrical output would be reduced to 390 MW compared to 400 MW for the Proposed Action.

In response to visual concerns, the onsite substation and battery energy storage system would be moved at least 0.7 mile to the northeast on either BLM-administered land (Substation Alternative A) or private land adjacent to SR-177/Rice Road (Substation Alternative B). This alternative substation location would be over 1.2 miles from residences within Lake Tamarisk, compared to approximately 0.6 mile under the Proposed Action.

The 500 kV gen-tie line under this alternative would exit the substation to the south, cross Hwy 177/Rice Road, then turn southwest to parallel the roadway on BLM land before crossing back to rejoin the Proposed Action route across the Oberon Project. At 7.5 miles, this gen-tie route would be approximately 0.8 miles longer than under the Proposed Action (6.7 miles).

## 2.5 Alternative 4: Community Buffer

The Community Buffer Alternative (EA App. A, Figure 2-10) would be located within the Project footprint and be similar to the Proposed Action, however, all panels would be removed within 1.5 miles to the east, 2 miles to the northeast, and 1 mile north of the nearest existing Lake Tamarisk Desert Resort. With the setback, approximately 530 acres would not be developed with solar panels compared to the Proposed Action and 480 acres not developed compared to the Reduced Acreage Alternative (with the 50 acres of solar panel already removed). Underground medium voltage 34.5 kV lines may need to cross within the setback area to connect the solar facility development areas to the onsite substation.

This alternative includes the construction of two earthen berms to screen the view of the solar facility from Lake Tamarisk Desert Resort, and would relocate the Project's substation, BESS facility, and O&M building approximately 1.25 miles northeast of the substation site in the Proposed Project. The earthen and sand berms would be 10-ft high, 20-ft across and 1,060 and 2,290 ft-long for the northern and easterly berms respectively and would be placed on the boundary but within the buffer area. Material would have

[2] Small-scale allowable impacts to sensitive resources, as per specific CMAs, that do not individually or cumulatively compromise the conservation objectives of that resource or rise to a level of significance that warrants development and application of more rigorous CMAs or a DRECP LUPA amendment. Minor incursions may be allowed to prevent or minimize greater resource impacts from an alternative approach to the activity. Not all minor incursions are considered unavoidable impacts.

to be imported for the berms given the lack of potential fill material in the immediate project vicinity. Each berm would require approximately 2,000 cubic feet of fill each, for a total of 4,000 cubic feet.

The relocation of the Project substation, BESS, and O&M building to an area adjacent to Hwy 177 would increase the length of the Project's gen-tie line to approximately 8.15 miles over the 6.7-mile length of the Proposed Project. The gen-tie line would be routed through the project site and around a private land parcel for 0.45 miles, then crossing to the east side of Hwy 177 and proceeding in a southerly direction for 2.3 miles, before proceeding east within the Oberon Solar Project to the Oberon Switchyard. Routing the gen-tie line across the Project site would increase the gen-tie length by 1.45 miles, as compared to the Proposed Project, and would preclude installation of solar panels along the gen-tie's 175-foot-wide right-of-way. This would result in the loss of nearly 14 acres of the solar field.

Additional acreage would also be lost to account for rerouting the gen-tie line across the solar facility site from the relocated substation site. Alternative 4 would therefore result in a reduction of at least 80 to 100 MW compared to the proposed Project and would generate 300 to 320 MW. This output compares to the Proposed Action at 400 MW and the Reduced Acreage Alternative at up to 390 MW.

## 2.6 Project Components

Project components of the Proposed Action are described in Appendix L (Project Components).

### L.1 Project Components Common to Action Alternatives

Common Project components of the Proposed Action, Reduced Acreage Alternative, and Community Buffer Alternative (collectively, the "Action Alternatives") are described in Appendix L (Project Components) for additional details.

### L.2 Construction Activities Common to Action Alternatives

Common construction activities of the Proposed Action, Reduced Acreage Alternative, and Community Buffer Alternative (collectively, the "Action Alternatives") are described in Appendix L (Project Components) for additional details.

### L.3 Operation and Maintenance Activities Common to Action Alternatives

Common operation and maintenance activities of the Proposed Action, Reduced Acreage Alternative, and Community Buffer Alternative (collectively, the "Action Alternatives") are described in Appendix L (Project Components) for additional details.

### L.4 Decommissioning

Decommissioning activities are described in Appendix L (Project Components) for additional details.

## 2.7 Summary of Alternatives

Table 2-1 provides a summary of the four alternatives analyzed in EA Chapter 3.

**Table 2-1. Summary of Alternatives Evaluated (Estimated: Final TBD)**

| Alternative (Alt.) | Name & Description | Capacity (MW) | Project Components on BLM Lands (acres) | Project Components on Private Lands (acres) | Permanent Disturbance Footprint (acres) | Portion of Application Area Not Developed (acres avoided) | Within Development Footprint (acres) | |
|---|---|---|---|---|---|---|---|---|
| | | | | | | | Desert Pavement | Desert Dry Wash Woodland |
| Alt. 1 | **No Action**<br>• No construction of solar facility and associated components. | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Alt. 2 | **Proposed Project**<br>• PV panels mounted as single panels on single axis tracker.<br>• 34.5 kV interior collection lines.<br>• 650 MW BESS, substation, O&M area located 0.7 miles east of Lake Tamarisk.<br>• 6.7-mile 500 kV gen-tie line connecting to Oberon Substation.<br>• Avoid most desert dry wash woodland including 200-foot buffer. | 400 | 1,211 | 629 | 1,995 | 1,688 | 40 | 16 |
| Alt. 3 | **Reduced Acreage**<br>• Reduce solar arrays by 50 acres in two locations near Lake Tamarisk.<br>• Move substation, BESS, and O&M area approximately 0.7 miles to the northeast and adjacent to Hwy 177.<br>• Lengthen gen-tie by 0.8 miles over Alt. 2 (7.5 miles). | 390 | 1,175 | 625 | 1,962 | 1,725 | 33 | 18 |
| Alt. 4 | **Community Buffer**<br>• Eliminate project components on 530 acres north of Lake Tamarisk creating a buffer.<br>• Construct 2 berms 1 mile north and 1.3 miles northeast of Lake Tamarisk (10-ft high, 20-ft across and 1,060 and 2,290 feet-long, respectively).<br>• Move substation, BESS, and O&M area approximately 1.25-miles northeast to 17-acre area adjacent to Hwy 177.<br>• Lengthen gen-tie by 1.45 miles over Alt. 2. (8.15 miles). | 320 | 926 | 579 | 1609 | 1,999 | 33 | 6 |

## 2.8 Alternatives Considered but Eliminated from Detailed Analysis

Six other alternatives were considered but eliminated from detailed analysis:

- Federal Land Alternative
- Private Land Alternative
- Alternative Solar Technologies
- Alternative Renewable Energy Technologies
- Conservation and Demand-Side Management
- Earthen Berms

Appendix M describes each of these alternatives and explains why each one was eliminated from detailed analysis.

# 3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

## 3.1 Introduction and Issues Analysis

This section describes the affected environment—the present conditions and trend of elements of the human environment that may be impacted by implementing one of the action alternatives. This section then describes, relative to that baseline, the environmental consequences to each resource that would result from implementing each of those alternatives. That discussion analyzes the anticipated direct, indirect, and cumulative effects.[3] The effects analysis considers use of CMAs to reduce the effects. Where the CMAs themselves do not reduce the effects, other mitigation measures that would avoid or reduce adverse effects are considered.

### 3.1.1 Issues Identification

Issues are points of discussion, dispute, or debate about the environmental effects of proposed actions. CEQ's NEPA regulations require agencies to "Identify and eliminate from detailed study the issues that are not significant or have been covered by prior environmental review(s) (40 CFR §1506.3 of this chapter), narrowing the discussion of these issues in the statement to a brief presentation of why they will not have a significant effect on the human environment or providing a reference to their coverage elsewhere." (40 CFR §1501.9(f)(1)). The objective in NEPA is to "Identify environmental effects and values in adequate detail so the decision maker can appropriately consider such effects and values alongside economic and technical analyses." (40 CFR §1501.2(b)(2)). The BLM therefore analyzes issues in detail when:

- Analysis is necessary to make a reasoned choice between alternatives (that is, does it relate to how the proposed action, or alternatives respond to the purpose and need?); or
- Analysis is necessary to determine the significance of impacts. The BLM identified relevant issues by reviewing public comment and through internal interdisciplinary team discussions during NEPA scoping and design of the proposed action.

### 3.1.2 Issues Identified for Analysis

The issues identified during internal and external scoping pointed the BLM to possible environmental effects, thus helping to refine the Proposed Action. Scoping also helped identify the CMAs or other mitigation that would reduce the severity of effects. The BLM identified five issues for detailed analysis that develop a meaningful comparison between alternatives and determine the significance of project impacts, enabling informed decision-making. Remaining issue areas that were determined to not require detailed

[3] Direct effects are those caused by the action and occurring at the same time and place. Indirect effects are those caused by the action but occurring later or in a different location. Cumulative effects result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions.

analysis, as a result of the screening process, are discussed in detail in Appendix D (Issues Considered but Not Analyzed in Detail) in this EA. The issue areas analyzed in detail in Sections 3.2 through 3.7 in this EA, along with each associated issues statement evaluated for analyses, are listed below:

- Air Quality and Greenhouse Gas Emissions: Would the project expose air-quality sensitive receptors to adverse air pollutant concentrations?
- Noise and Vibration: Would the project generate noise that would adversely affect sensitive receptors?
- Vegetation and Wildlife Resources: Would the project affect plant species and native plant communities, including microphyll woodlands, either directly or indirectly, including through degradation or habitat loss? Would the project affect federally listed and special status plants, fish, wildlife, either directly or indirectly, including through degradation or loss of habitat?
- Visual Resources: Would the project result in short-term or long-term diminished landscape character?
- Water Resources: Would the project affect water resources, including surface water, floodplains, and groundwater?

### 3.1.3 Affected Environment

The identified issues determine the extent of the affected environment under consideration. The EA presents information on the affected environment where data is relevant to understanding of potential impacts and is necessary to answer to the question captured in the issue statement.

The description of the affected environment includes the current condition of resources relevant to each issue area, and the characteristics that may be subject to impacts of the three action alternatives, the Proposed Action, Reduced Acreage and Community Buffer Alternatives, and the No Action Alternative. Where a supplemental authority, such as a statute, regulation, or executive order should be considered as part of the environmental analysis, it is included in this section.

### 3.1.4 Cumulative Effects

The following information regarding past, present, and reasonably foreseeable actions for cumulative effects applies to all action alternatives, and for all resource impacts discussed below. Reasonably foreseeable future actions are those for which there are existing decisions, funding, formal proposals, or which are highly probable, based on known opportunities or trends. Appendix M, Tables M.2-1 and M.2-2 include the list of all foreseeable projects on private and BLM-administered land in the Desert Center and Blythe region within the East Riverside DFA as identified in the DRECP.

The Project and alternatives, in combination with the 30 identified local energy projects (solar, pumped storage, and transmission substations), would contribute to cumulative effects within this DFA (See EA App. A, Figure 1-4). The DRECP, FEIS Section IV.25.3.20 (page IV.25-101) states that during construction and decommissioning of renewable projects permitted under the DRECP, activities and equipment visible from residences, public roads, and public preserves would result in short-term impacts. Examples include dust and exhaust emissions, removal of vegetation during site clearing, grading, presence of vehicles and equipment, mobilization and demobilization activities, material delivery and staging, assembly of components, site lighting, and construction and later removal of structures.

Renewable projects were anticipated to be developed in this DFA over the same general time frame resulting in the potential for overlap construction activities. There has been nearly continuous solar energy development in this vicinity since the start of the Desert Sunlight Solar Project in late 2011. A potential overlap of construction activities could occur with the adjacent Sapphire Solar Project.

Renewable energy facilities permitted under the DRECP would require equipment, structures, fencing, roads, and other elements to operate a facility that would have a long-term effect on the environment. The area near Desert Center is recognized in the DRECP as having the potential for experiencing a substantial

introduction of dozens of renewable projects. In addition, projects such as the Devers-Palo Verde II 500 kV Transmission Line contribute to the overall cumulative effects.

However, these projects incorporate numerous CMAs and BPMs designed to reduce the overall cumulative effects within the DFA. These measures include implementation of fugitive dust control plans, surface treatments of project structures and buildings to minimize visual intrusion and contrast by blending with (matching) the existing characteristic landscape colors, applying weather coating to the exterior security fencing to minimize effects, implementing an effective night lighting management program to minimize fugitive light and protect night sky, and adding project design features including proper siting and location.

## 3.2 Issue 1: Air Quality and Greenhouse Gas Emissions

### 3.2.1 Air Quality Issue Statement and Methodology for Analysis

*Would the project expose air-quality sensitive receptors to adverse air pollutant concentrations or generate greenhouse gas emissions that would have a significant impact on the environment?*

This section describes the affected environment with respect to air quality for the proposed Project, and the analysis describes the Project's sources of air pollutant emissions during construction and operation and the localized effects of those emissions. The POD Appendix S (Air Quality Emissions Report) provides details on the construction and operational assumptions for the proposed Project and resulting emissions estimates used in this analysis.

### 3.2.2 Affected Environment

The Project would be located in Riverside County within the jurisdiction of the South Coast Air Quality Management District (SCAQMD) in the Mojave Desert Air Basin (MDAB). The Air Quality Emissions Report provides input regarding the air basin, regulations, thresholds of significance, and impacts (see POD Appendix S).

**Criteria Air Pollutants**. Air quality is determined by measuring ambient concentrations of air pollutants. Criteria pollutants are those described in the Clean Air Act for which acceptable levels of exposure can be determined and for which health-based standards have been set. The criteria pollutants are ozone, respirable particulate (PM10), fine particulate matter (PM2.5), carbon monoxide (CO), nitrogen dioxide (NO2), sulfur dioxide (SO2), and lead. Reactive organic gases (ROG), including volatile organic compounds (VOC), are regulated as precursors to ozone formation. The Riverside County portion of the MDAB is in non-attainment for ozone and PM10 under the California Ambient Air Quality Standards. The MDAB is in attainment with the National Ambient Air Quality Standards for all criteria pollutants (see POD Appendix S) and generally enjoys good air quality.

**Greenhouse Gas Emissions.** The "greenhouse effect" that allows heat radiated from the Earth's surface to warm the atmosphere affects global climate through the presence of naturally occurring greenhouse gases (GHGs). The greenhouse effect is driven mainly by water vapor, aerosols, carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O). Human activity directly contributes to emissions of GHGs. Globally, the presence of GHGs affects temperatures, precipitation, sea levels, ocean currents, wind patterns, and storm activity. The primary observed changes in California's climate include increased annual average air temperatures, more frequent extremely hot days and nights, and increased severity of drought. Impacts to physical systems affected by warming temperatures and changing precipitation patterns show decreasing snowmelt runoff, shrinking glaciers, rising sea levels, and increasing fire severity. Impacts to terrestrial, marine, and freshwater biological systems are resulting in changes to habitat, architecture, and food supply, with the potential to impact human well-being (OEHHA, 2018).

Modeling shown by Cal-Adapt, from the Geospatial Innovation Facility at University of California, Berkeley indicates that the project area could experience higher annual average maximum temperatures, greater numbers of extreme heat days, and longer dry spells in the mid-century to end-of-century periods.

**Valley Fever.** Valley Fever (coccidioidomycosis) is an illness caused by the inhalation of soil dwelling *Coccidioides* fungus spores. *Coccidioides* fungus lives in the top 2 to 12 inches of soil. The fungus is common in many parts of California, notably in the Central Valley and in the western Mojave Desert or other dry areas (CDPH, 2013). There was an average of under 6 cases of reported Valley Fever in Riverside County annually during the period from 2011 to 2017 (CDC, 2020). Humans become infected when the fungal spores are released into the air by soil disturbing activities and people inhale the spores. Valley Fever is not transmitted directly from person to person. Valley Fever is potentially serious; in California more than 1,000 people are hospitalized and around 80 people die from Valley Fever every year (CDPH, 2020).

### 3.2.3 Direct and Indirect Environmental Effects

All construction- and operation-related emissions are quantified based on the best available forecast of activities. This analysis uses results from the Air Quality Emissions Report (AQER) (POD Appendix S) which use the California Emissions Estimator Model (CalEEMod; version 2020.4.0) software developed by the California Air Pollution Control Officers Association (CAPCOA). This is the most recent version of the CalEEMod software, and it relies upon mobile source emission factors from the Air Resources Board (ARB) OFFROAD2011 inventory and EMFAC2017 models. Details on the construction activity assumptions, emission factors, and resulting quantities of emissions output by CalEEMod appear in the AQER.

**Alternative 1: No Action**

Under the No Action Alternative, construction and operation of the solar facilities, gen-tie line, and associated infrastructure would not occur and therefore no air emissions would be generated through construction, operation, or decommissioning. Because soil disturbance would not occur, there would not be increased risk of Valley Fever spores being released and associated illness. It would not result in any direct, indirect, or cumulative impacts to air quality or GHG emissions. The lands within the DFA would remain open to future solar project or linear facilities.

**Alternative 2: Proposed Action**

***Air Quality***

General conformity with de minimis thresholds (40 CFR Part 93, Subpart B, et seq.) may be used in the characterization of an air quality impact for NEPA purposes.[4] Because the Riverside County portion of the MDAB has federal designations of unclassifiable/attainment for all pollutants, including ozone (with NOx and VOC as precursors) and PM10, federal agency actions are not subject to Clean Air Act general conformity review requirements. Because no general conformity emissions thresholds specifically apply in the Riverside County portion of the MDAB, this analysis instead compares the emissions of implementing the Proposed Action to the de minimis thresholds for NOx, VOC, and PM10 that would apply in the nearby Salton Sea Air Basin portion of the SCAQMD jurisdiction.[5] These criteria air pollutant rate thresholds are: 25 tons per year of NOx or VOC; 70 tons per year of PM10 or PM2.5; and 100 tons per year for CO and SOx. This meets DRECP CMA LUPA-AIR-3 and CMA LUPA-AIR-4.

Tables 3.2-1 and 3.2-2 shows that levels of emissions of criteria air pollutants from the development of the Proposed Action would not exceed any annual emissions thresholds and are unlikely to cause any new violation of the ambient air quality standards (see AQER in POD Appendix S).

[4] 40 CFR 93 § 153 defines de minimis levels, that is, the minimum threshold for which a conformity determination must be performed, for various criteria pollutants in various areas. The phrase "de minimis" means "of minimum impact," thus, qualification for de minimis means there would be no significant contamination of the air.

[5] The Salton Sea Air Basin is adjacent to and upwind of the project area. The EA provides this information about the project area and this portion of Salton Sea Air Basin because these areas are both under the same air quality management jurisdiction of SCAQMD. Additionally, the primary transportation corridor for the project (along I-10) travels through the nearby Riverside County portion of the Salton Sea Air Basin.

Table 3.2-1 summarizes the annual emissions of anticipated construction, without potential mitigation. Unmitigated annual emissions for construction phase activities do no exceed NEPA thresholds.

**Table 3.2-1. Construction, Annual Emissions without Mitigation**

| | Annual Emissions, per year (ton/year) | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **NOx** | **CO** | **SOx** | **PM10** | **PM2.5** |
| Maximum Annual Emissions, without Mitigation | 2.87 | 17.84 | 27.19 | 0.08 | 25.15 | 3.95 |
| Annual Emissions Thresholds for NEPA Purposes | 25 | 25 | 100 | 100 | 70 | 70 |

Source: Table 6 in POD Appendix S.

Table 3.2-2 summarizes the annual emissions of anticipated construction, including mitigation for dust control practices (MM AQ-1) and off-road equipment engine standards (MM AQ-2). Annual mitigated CO emissions are slightly higher than unmitigated, due to the fact that NOx and CO emissions are inversely related, and emission control measures aim to balance these. Tier 4 engines maintain low CO emissions, though they are slightly higher in order to maximize NOx emission reductions. Mitigation measures included in the calculation of the reported emissions include Tier 4 engine usage, watering exposed areas, watering unpaved roads, and the use of soil stabilizer, as these are the emission reduction measures available in the modelling software. Additional mitigation measures as described in MM AQ-1 would further decrease fugitive dust emissions. Watering the site twice daily is a 55% effective PM10 control measure per Rule 403, per SCAQMD Table XI-A, dust suppressants are 84% effective PM10 control measure, limiting on site vehicle speeds on unpaved roads to 15pmh is 57% effective, and graveling of unpaved exits from the construction site to prevent track-out is a 46% effective PM10 control measure (SCAQMD, 2007).

**Table 3.2-2. Construction, Mitigated Annual Emissions**

| | Annual Emissions, per year (ton/year) | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **NOx** | **CO** | **SOx** | **PM10** | **PM2.5** |
| Maximum Annual Emissions, Mitigated | 1.73 | 9.25 | 28.43 | 0.08 | 6.99 | 1.65 |
| Annual Emissions Thresholds for NEPA Purposes | 25 | 25 | 100 | 100 | 70 | 70 |

Source: Table 7 in POD Appendix S.

Construction equipment and on-road vehicle traffic associated with construction would create exhaust emissions from fuel combustion, and particulate matter from ground disturbing activities. Wind erosion of surfaces exposed during ground disturbance and activities on paved or unpaved surfaces can cause fugitive dust emissions. With implementation of MM AQ-1 and MM AQ-2, fugitive dust emissions would be 78lbs/day, which would below local SCAQMD daily construction threshold of 150 lbs/day (see POD Appendix S, AQER). This meets CMA LUPA-AIR-2.

During construction, the emissions created would be intermittent and variable because construction would occur in phases. Pollutants would be emitted from several individual pieces of equipment widespread over the site. Concentrations of hazardous air pollutants and toxic diesel particulate matter (DPM) emissions from mobile sources and equipment are greatly reduced by distance, such that a separation of 1,000 feet normally allows sensitive land uses to avoid high levels of DPM concentrations (ARB, 2005). Due to this, the localized ground-level concentrations of criteria air pollutants and other toxic air contaminants would not be likely to reach substantial or adverse levels. To reduce such concentrations further still, all activities would comply with MMs AQ-1 (Fugitive Dust Control Plan) and AQ-2 (Control On-Site Off-Road Equipment Emissions) to meet SCAQMD Rule 402 (Nuisance) and Rule 403 (Fugitive Dust) (see full text

of measures in EA Appendix H). MM AQ-1 would also meet CMA LUPA-AIR-5. Since there are a small number of workers (no more than 10) during operation for ongoing maintenance, operation-related emissions would be minor and limited.

As shown in Table 3.2-1, the Proposed Action would not exceed any annual emissions thresholds derived from general conformity regulations, which also serves to meet CMA LUPA-AIR-1. The emissions shown in Table 3.2-1 are well within the assumptions of estimated construction-phase emissions included in the analysis in the DRECP FEIS Section IV.2.3.2.1, Table IV.2-3.

The nearest federal Class I area is the boundary of the Joshua Tree National Park, which is approximately 3 miles away from the nearest boundary of the project site. Under Section 162(a) of the Clean Air Act, federal Class I areas have special air quality protections to preserve visibility in areas such as National Parks and Monuments. Temporary and potentially adverse impacts to visibility at the Class I area could occur due to construction-related emissions. The source of emissions during construction would occur near the ground level, so dust emissions would have a limited ability to affect distant vistas, and emissions would be dispersed across the project site so impacts to Class I areas would be minimal. Implementation of MM AQ-1 would further reduce any fugitive dust. The Proposed Action would not trigger any requirements in the federal Prevention of Significant Deterioration permitting program, which addresses visibility impairment due to stationary sources in the region.

The proposed action is required to comply with SCAQMD Rule 403 – Fugitive Dust. This rule is part of the EPA-approved State Implementation Plan and specifies Best Available Control Measures, Fugitive Dust Control Plans, and other actions at potential fugitive dust sources, including large operations such as the proposed action, necessary to ensure compliance with applicable air quality standards in the context of reasonably expected development in the District. Implementation of Rule 403 together with BLM-approved CMAs will maintain compliance with NAAQS in all areas surrounding the proposed action, including nearby communities and Joshua Tree National Park. The rule provides that PM10 monitoring will be conducted at the site by SCAQMD at the site owners expense if determined necessary by the SCAQMD Board.

**Valley Fever**. Construction activities such as grading, excavation, and construction vehicle traffic, could loosen and stir up soil potentially containing *Coccidioides* fungus spores, exposing workers and the public to potentially contracting Valley Fever. Ways to reduce the risk of Valley Fever include avoiding exposure to dusty air or dust storms, preventing dirt or dust from becoming airborne by wetting or use of palliatives, and if working at a dusty site, use of an N95 or equivalent mask or respirator (CDPH, 2013). Construction activities for the project would be subject to stringent dust control requirements (including SCAQMD Rules 402 and 403). Implementation of MM AQ-1 (Fugitive Dust Control Plan) would reduce the potential for workers and the public to contract Valley Fever.

**Herbicide Use.** State and local air quality regulatory agencies do not have specific regulations for manual, mechanical, or herbicide treatment methods. The PEIS provided a detailed analysis of potential air quality impacts associated with the application of herbicides (pages 4-5 through 4-13). Only herbicides included in the PEIS would be used. The PEIS ROD identified SOPs for air quality (See EA Appendix B).

Herbicides not analyzed under the PEIS but approved for use by BLM-CA or have an approved project PUP, would be considered for use. All applications would occur in compliance with EPA regulations and the product manufacturer's label instructions. Application of herbicides will be suspended when wind velocity exceeds 10 mph during application of liquids or 15 mph during application of granular herbicides. Additional information regarding use and control of herbicides for vegetation management are addressed in Section 3.4, Vegetation and Wildlife Resources.

***Greenhouse Gas Emissions***

The project would cause GHG emissions due to fossil-fuel consumption during construction, operation, and decommissioning, and because of land use conversion. The operation of the project would produce electricity from renewable resources, which could displace the need to produce electricity from fossil fuel resources. If the electricity from the project displaces electricity produced from fossil fuels, then the amount

of GHGs emitted over the 30-year life of the project from construction, plus the loss of carbon sequestration potential due to land use conversion, would be far less than the GHG emissions from equivalent power production by conventional resources (see AQER in POD Appendix S).

The proposed Project would produce up to about 840,000 megawatt-hours (MWh) each year for end-use by California's customers. The electricity produced by the project will minimize or eliminate the need to produce electricity from California's flexible natural gas-fired resources or the need to otherwise import electricity to California. This would avoid GHG that could otherwise be emitted by fuel-burning generators at a rate of approximately 333,686 $MTCO_2e$ per year, after accounting for line losses based on an avoided emissions displacement factor of 0.373 MT of $CO_2$ per MWh for the 650 MW BESS (CEC, 2019).

The BESS component would allow the solar facility to shift the solar output to the grid-wide system peak (evening) hours when the solar production has the most benefits (or is most valuable in deferring use of natural gas elsewhere). By using power to charge the storage component before discharging, some round-trip loss of energy would occur, and this would reduce the overall MWh-produced for end-users. The output of the storage component would be likely to be timed (dispatched) to occur during hours of peak demand for electricity. By dispatching stored renewable power during the hours of highest demand, the storage component is likely to result in beneficial GHG effects by displacing the peak-hour use of fossil fuel-burning generating units on the grid.

The SCAQMD recommends construction emissions to be amortized over the life of the project, defined as 30 years, meaning that the total construction emissions are divided by 30 years to give a yearly amortized emission rate. Amortized GHG emissions would be equivalent to an annualized rate of 399 $MTCO_2e/yr$, operational direct on-site activities would add an additional 559 $MTCO_2e$/year, and land use conversion would result in up to 16,098 $MTCO_2e/yr$ of sequestration capability lost (see AQER in POD Appendix S). As mentioned previously, approximately 333,686 $MTCO_2e$ would be avoided per year due to avoided fossil fuel energy by the proposed Project.

The amount of GHGs emitted over the 50-year or more life of the project from construction, plus the loss of carbon sequestration potential due to land use conversion, plus emissions due to O&M activities would be far less than the GHGs emitted from equivalent power production by conventional fossil fuel resources and cement production during construction. Net GHG emissions related to the proposed Project would be negative, and as such would have a reduced impact on the rate of climate change. Accordingly, the project would contribute towards achieving GHG emissions reduction targets in the State of California.

**Alternative 3: Reduced Acreage Alternative**

The Alternative 3 would remove approximately 30-acres of solar panels closest to the Lake Tamarisk community, plus an additional 20 acres of panels further North. In Alternative 3, solar panels would be approximately 2,350 feet from the northeast corner of the Lake Tamarisk Desert Resort community compared to 750 feet under the Proposed Project. Peak daily rate of emissions during construction depends on peak day workforce and peak day fleet of equipment, if those are scaled down under Alternative 3, then resulting emissions would be scaled down. Yearly emissions, would be scaled down due to a decrease in total panels installed. Construction equipment and on-road vehicle traffic associated with construction would create exhaust emissions from fuel combustion, and particulate matter from ground disturbing activities and wind erosion of surfaces exposed during ground disturbance.

Table 3.2-3 summarizes the annual emissions within each of the calendar years of anticipated construction, without mitigation measures. Table 3.2-4 summarizes annual emissions including mitigation for dust control practices (MM AQ-1) and off-road equipment engine standards (MM AQ-2). Emissions compared to the Proposed Action and over the course of the project would be approximately 17% decreased due to the decrease in site acreage and solar panels installed.

**Table 3.2-3. Construction, Annual Emissions without Mitigation for Alternative 3**

| | Annual Emissions, per year (ton/year) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | NOx | CO | SOx | PM10 | PM2.5 |
| Maximum Annual Emissions, without Mitigation | 2.38 | 14.81 | 22.57 | 0.07 | 20.87 | 3.28 |
| Annual Emissions Thresholds for NEPA Purposes | 25 | 25 | 100 | 100 | 70 | 70 |

Source: EA Appendix A, Figure 3.2-1.

**Table 3.2-4. Construction, Mitigated Annual Emissions for Alternative 3**

| | Annual Emissions, per year (ton/year) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | NOx | CO | SOx | PM10 | PM2.5 |
| Maximum Annual Emissions, Mitigated | 1.44 | 7.68 | 23.60 | 0.07 | 5.80 | 1.37 |
| Annual Emissions Thresholds for NEPA Purposes | 25 | 25 | 100 | 100 | 70 | 70 |

With an approximately 17% decrease in acreage as compared to Alternative 2, GHG emissions for Alternative 3 would be approximately equivalent to an annualized rate of 14,156 MTCO2e/year. Approximately 200,167 MTCO2e would be avoided per year due to avoided fossil fuel energy under Alternative 3. The overall air quality and GHG emissions generated through construction activities would not exceed any annual emissions thresholds, including the SCAQMD thresholds for criteria pollutants and GHG emissions. For Alternative 3, the associated direct, indirect, and cumulative effects to air quality and GHGs would be slightly less than those of the proposed Project, although the net decrease in GHG emissions would also be slightly less than the decrease in GHG emissions from the Proposed Action.

**Alternative 4: Community Buffer**

Alternative 4 would remove all panels within 1 mile to the north, 1.5 miles to the east, and 1.75 miles to the northeast of the property line of the nearest residence in the Lake Tamarisk Desert Resort. The Community Buffer Alternative would also include the construction of two berms in locations requested by the commenters to screen the view of the solar facility from Lake Tamarisk Desert Resort. As with Alternative 3, if peak daily rate of emissions during construction are scaled down under Alternative 4, then resulting emissions would be scaled down as well. Yearly emissions would be scaled down due to a decrease in total panels installed. Approximately 250 trucks would be needed to import up to 4,000CY of fill for the berms. Construction equipment and on-road vehicle traffic associated with construction would create exhaust emissions from fuel combustion, and particulate matter from ground disturbing activities and wind erosion of surfaces exposed during ground disturbance. Additionally, the earthen berms would be difficult to stabilize with vegetation, and therefore, could become a source of erosion and fugitive dust during windy periods.

Table 3.2-5 summarizes the annual emissions within each of the calendar years of anticipated construction, without mitigation measures. Table 3.2-6 summarizes annual emissions including mitigation for dust control practices (MM AQ-1) and off-road equipment engine standards (MM AQ-2). Emissions over the course of the project would be approximately 27% decreased due to the decrease in site acreage and solar panels installed.

**Table 3.2-5. Construction, Annual Emissions without Mitigation for Alternative 4**

| | Annual Emissions, per year (ton/year) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | NOx | CO | SOx | PM10 | PM2.5 |
| Maximum Annual Emissions, without Mitigation | 2.10 | 13.02 | 19.85 | 0.06 | 18.36 | 2.88 |
| Annual Emissions Thresholds for NEPA Purposes | 25 | 25 | 100 | 100 | 70 | 70 |

Source: EA Appendix A, Figure 3.2-1.

**Table 3.2-6. Construction, Mitigated Annual Emissions for Alternative 4**

| | Annual Emissions, per year (ton/year) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | NOx | CO | SOx | PM10 | PM2.5 |
| Maximum Annual Emissions, Mitigated | 1.26 | 6.75 | 20.75 | 0.06 | 5.10 | 1.20 |
| Annual Emissions Thresholds for NEPA Purposes | 25 | 25 | 100 | 100 | 70 | 70 |

Source: EA Appendix A, Figure 3.2-1.

With an approximately 27% decrease in acreage, GHG emissions for Alternative 4 would be approximately equivalent to an annualized rate of 12,451 $MTCO_2e$/year. Approximately 148,842 MTCO2e would be avoided per year due to avoided fossil fuel energy under Alternative 4. The overall air quality and GHG emissions generated through construction activities would not exceed any annual emissions thresholds, including the SCAQMD thresholds for criteria pollutants and GHG emissions. For Alternative 4, the associated direct, indirect, and cumulative effects to air quality and GHGs would be slightly less than those of the proposed Project, although the net decrease in GHG emissions would also be slightly less than the decrease in GHG emissions from the proposed Project.

### 3.2.4 Cumulative Effects

For air quality, the geographic scope of cumulative effects includes consideration of regional air emissions across the entire MDAB. The incremental contribution of the proposed solar facility would be reduced through implementation of MMs AQ-1 and AQ-2. Construction emissions would not cause substantial long-term cumulative impacts because the construction-related criteria air pollutant emissions would be mitigated and would cease with completion of the 20-month duration of work, and the incremental contribution of the project to the cumulative air quality impact would be reduced to the extent feasible during construction.

As noted in the DRECP FEIS Section IV.25.3.2 (p. IV.25-32), cumulative renewable energy projects would create construction dust and exhaust emissions from construction equipment and vehicles. This increase could violate or contribute to an existing violation of air quality standards, which would be an air quality impact during the limited or short-term phases of construction. Any cumulative project would require environmental permitting and would comply with applicable DRECP CMAs (CMAs LUPA-AIR-1 to -5) and likely incorporate mitigation measures to reduce the short- and long-term air emissions and thus would not conflict with applicable air quality plans.

GHG emissions are inherently a cumulative concern with a cumulatively global scope. The evaluation of GHG impacts demonstrated that the project would result in a long-term net reduction of GHGs through avoided fossil-fuel burning. Likewise, DRECP FEIS Section IV.25.3.3 (p. IV.25-36) concludes that potential renewable energy projects permitted under the DRECP would facilitate the GHG emissions reductions that California expects to achieve by generating electricity from renewable energy resources rather than fossil fuel technologies.

The construction-phase emissions related to the proposed project would likely occur concurrently with other cumulative projects in the Mojave Desert Air Basin and would contribute to the adverse effects of other cumulative projects on air quality. Because construction-related criteria air pollutant emissions would be mitigated and would entirely cease after construction, within an approximately 20-month duration of work, the construction emissions would not cause substantial long-term cumulative impacts. The incremental contribution of the proposed project to the cumulative air quality impact would be reduced to the extent feasible during construction and would not be considerable.

## 3.3 Issue 2: Noise and Vibration

### 3.3.1 Noise and Vibration Issue Statement and Methodology for Analysis

*Would the project generate noise or vibration that would adversely affect sensitive receptors?*

Analysis of noise and vibration levels was performed through quantitative estimates of expected noise levels, review of agency policies and regulatory requirements, and qualitative analyses for issues that do not readily lend themselves to quantitative evaluation. Quantitative analyses were prepared to address noise and vibration from use of construction equipment on site, noise from construction-related traffic, and noise from facility operations.

The area of interest for noise and vibration issues is typically localized. Airborne noise dissipates with increasing distance from the noise source. The distances involved depend primarily on the intensity of the noise generated by the source, and partly on weather conditions such as wind speed and direction, the height and strength of temperature inversions, and the height of cloud cover. For noise sources such as construction activity and vehicle traffic, although potentially audible over large distances, the region of greatest influence is typically less than 0.25 miles (1,320 feet) from the noise source (Riverside County Noise Ordinance No. 847). The Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual, considers an exterior construction noise level of 80 dBA Leq as a reasonable daytime threshold for noise sensitive residential land use with a nighttime exterior construction noise level of 70 dBA Leq (FTA, 2018).

Ground-borne vibrations similarly dissipate rapidly with increasing distance from the vibration source. The distances involved depend primarily on the intensity of the vibrations generated by the source, and partly on soil and geologic conditions. Detectable vibrations will travel the greatest distance through solid rock and the least distance through loose, unconsolidated soils or saturated soils. For vibration sources such as construction activity and vehicle traffic, the region of influence is typically less than 200 feet from the vibration source (Caltrans, 2020).

### 3.3.2 Affected Environment

Ambient noise measurements were not conducted for this analysis because the environmental setting can be described from information drawn from previous studies in the area. The noise environment of the Project area depends on the proximity of the receiver to noise from vehicular traffic on State Route 177 (SR-177) or Interstate 10 (I-10). Locations away from these highways experience extremely low levels of noise. Because few human-induced sources of noise occur around the Project area, the noise environment is generally serene and quiet apart from traffic on the area roadways. Based on population density in the Project area, the natural background day-night noise levels are likely 35 to 45 dBA, which corresponds to the range of levels in wilderness and typical rural area daytime background conditions (BLM, 2010; BLM, 2015).

Historically, noise surveys conducted for the Riverside County General Plan found locations along I-10 to be exposed to approximately 81.9 dBA Ldn near the edge of the highway and over 60 dBA Ldn for any location within approximately 2,000 feet of the I-10 centerline (Riverside County, 2015a). Locations along SR-177 are exposed to less noise due to lower levels of traffic. Traffic data collected for SR-177 near the Project site shows roughly 2,200 vehicles daily and approximately 14 percent of the baseline vehicles are trucks (Caltrans, 2020). With this mix of baseline traffic, baseline noise levels would be approximately

63 dBA Ldn at 100 feet from the centerline of SR-177. For any location more than 400-feet from SR-177, baseline noise levels would be less than 55 dBA Ldn (see Appendix I, Noise Calculations).

**Noise Sensitive Receptors.** In the Riverside County Noise Ordinance and Noise Element, "noise-sensitive" land uses include but are not limited to residences, passive recreation areas, schools, hospitals, rest homes, places of worship, and cemeteries (Riverside County, 2015a, b).

The proposed Easley Project site is near the Lake Tamarisk community in unincorporated Riverside County and would develop land that is primarily used as open space. The proposed Project site is adjacent to the alignments of SR-177 (or Rice Road) and Kaiser Road.

The nearest sensitive land uses include the Lake Tamarisk community and occasional rural residences along SR-177 (Rice Road), such as near Black Binder Road. The Lake Tamarisk community and homes along Kaiser Road would be adjacent to the southwestern-most parcels of the proposed Easley Project. The nearest home in Lake Tamarisk on Shasta Drive would be approximately 0.05 miles (260 feet) from the boundaries of the Easley Project, although construction activity would be set back, at least 200 meters (656 feet), from this residential land use.

### 3.3.3 Direct and Indirect Environmental Effects

Analysis of noise and vibration levels was performed through quantitative estimates of expected noise levels, review of agency policies and regulatory requirements, and qualitative analyses for issues that do not readily lend themselves to quantitative evaluation. Quantitative analyses were prepared to address noise and vibration from use of construction equipment on site, noise from construction-related traffic, and noise from facility operations.

**Alternative 1: No Action**

The No Action Alternative would not develop the solar facility and gen-tie line, and it would avoid all new construction and/or operational activities. It would not result in any change in ambient noise levels or generate noise from any new sources. Therefore, the No Action Alternative would have no noise impacts. The lands within the DFA would remain open to future solar project or linear facilities.

**Alternative 2: Proposed Action**

**Siting**. The Proposed Action is consistent with Riverside County General Plan, Noise Element Policy N 1.2 by concentrating facilities near SR-177 and Kaiser Road and in the vicinity of other noise-producing land uses such as the Desert Center Airport and Chuckwalla Valley Raceway. The gen-tie segments would be adjacent to other existing facilities and should be consistent with existing ambient noise levels during operation (Riverside County, 2015).

**Construction of Solar and Energy Storage Facilities.** Construction of the solar and energy storage facilities would use equipment such as trucks, light-duty vehicles, backhoes, loaders, excavators or trenchers, forklifts, cranes, compactors, and drill rigs or augers. The activity likely to cause the highest noise levels at the site would be installation of steel piles for supporting PV structure. Maximum intermittent noise levels near steel pile installation activities are up to 90 dBA Lmax (Maximum Sound Level) and 83 dBA Leq at 50 feet. For activities other than pile installation, typical maximum intermittent noise levels near the equipment would vary up to 84 dBA Lmax and 80 dBA Leq at 50 feet.

The noise levels caused by typical activities within the site would be substantially lower when experienced at locations distant from the site boundaries. Because sound fades over distance, on-site noise would diminish over the additional distances separating noise sensitive receptors from the proposed activities. Assuming the standard spherical spreading loss (reduction of 6 dB per doubling of distance) and the highest unmitigated construction noise source of 83 dBA Leq at 50 feet, the noise level caused by a typical spread of construction equipment would be 62 dBA Leq at the nearest occupied residences in the Lake Tamarisk community, 200 meters (656 feet) from the nearest proposed construction. This demonstrates that the nearest

receiver locations would not be exposed to noise levels exceeding the reasonable daytime 80 dBA Leq or the nighttime 70 dBA Leq thresholds during construction activities (see Appendix I, Noise Calculations).

With respect to construction-related traffic noise, development activities would also cause offsite noise, primarily due to trucks needed to deliver and remove materials and from the traffic of commuting workers. Haul trucks would make trips to bring equipment, water, and materials to the site and remove waste. Access to the site would be from SR-177 (Rice Road) and Kaiser Road. The instantaneous peak noise levels from passing trucks and commuting worker vehicles would be approximately 70 to 76 dBA at 50 feet. This noise would be concentrated at staging areas, along access roads, and the thoroughfares used by Project traffic, primarily SR-177 and Kaiser Road. Along SR-177, the traffic from construction-related workers and haul trucks would increase SR-177 day-night noise levels by 3 dBA over the baseline levels, from 63 dBA to approximately 66 dBA Ldn within 100 feet of the centerline or from 64 dBA to 67 dBA CNEL.

Construction noise would result in a perceptible, but temporary, increase in daytime environmental noise, nearby to the solar facility and along the traffic routes. This is consistent with DRECP FEIS Section IV.21.3.2 (page IV.21-21), which notes that construction renewable energy technologies and transmission would result in increases in short-term noise levels in the vicinity of the developments and that receptors around these lands would be exposed to short-term noise impacts from construction activities. For evening or nighttime construction-related traffic, the effects on day-night noise levels would be more pronounced than traffic confined to daytime hours because of the increased sensitivity during the evening and nighttime hours (between 7:00 p.m. and 7:00 a.m.). The Project could conflict with Riverside County General Plan policies to minimize the impacts of construction noise if Project construction traffic along SR-177 and Kaiser Road would cause day-night noise levels to substantially increase during evening or nighttime hours. To reduce the impact of evening and nighttime construction traffic noise, this analysis recommends mitigation to restrict construction deliveries to daytime hours.

Mitigation Measures (MMs) N-1 (Construction Restrictions), N-2 (Public Notification Process), and N-3 (Noise Complaint Process) would ensure that construction activities outside of daytime hours would be limited to light-duty equipment and vehicles, and notification and complaint resolution processes would be established (see Appendix F for the full text of all mitigation measures.) Any variance to construction hours authorized by Riverside County in accordance with MM N-1 will be provided to the BLM, and public notification in accordance with MM N-2 will inform the nearby residents and visitors of the updated construction hours and duration of the variance.

In addition, the Applicant has stated in APM NOISE-1 (see POD Appendix T) that it will avoid or minimize use of any impact hammer for pile driving or other equipment similarly capable of producing disruptive noise during construction activities within a one-mile radius from the residential parcel on the northeast corner of the Lake Tamarisk Desert Resort community during the winter months of highest residency (November 1 to March 31). If, based on the final construction schedule, use of such equipment is necessary within this geographic area during the aforementioned time period, the Applicant will avoid or minimize this construction activity in the early morning or late evening. Implementation of APM NOISE-1 will further reduce this impact.

**Construction of the 500kV Gen-Tie Line.** Construction of the 500 kV gen-tie structures and installation of poles and conductors would involve a line truck, water truck, crane, backhoe, excavator, and helicopters. Gen-tie construction noise would result in a readily perceptible, but temporary, increase in daytime environmental noise. Gen-tie construction activities would only intermittently affect any one location as the construction crews move along the alignment.

Near each pole site, the equipment in the gen-tie construction spread and overhead helicopter operations would generate increase ambient noise during use of offroad equipment and during helicopter overflights, takeoffs, and landings. Helicopter operations could be expected to generate noise levels of approximately 92 dBA within about 100 feet to 450 feet of the source depending on payload capacity of the helicopter, and locations a few hundred feet from the source would experience less than 90 dBA (U.S. Forest Service, 2023). Using a helicopter for 15 minutes in a typical hour would result in approximately 83 dBA Leq at

200 meters (656 feet) (see Appendix I, Noise Calculations), this is a conservative estimate as the final location of the gen-tie line is approximately 3,906 feet from the nearest dwelling.

Mitigation Measure N-1 (Construction Restrictions) would ensure that construction activities outside of the schedule of the Riverside County Noise Ordinance would be limited to light-duty equipment and vehicles, and Mitigation Measures N-2 (Public Notification Process) and N-3 (Noise Complaint Process) would also ensure that nearby residents are provided advance notification of potentially adverse noise conditions and to ensure that complaints are resolved. For construction of the gen-tie, this impact with mitigation would not be significant.

**Vibration**. During construction, the impact or vibratory pile drivers used for installing steel piles would have the greatest radius of potential ground borne vibration impacts and could result in vibration that is perceptible and potentially annoying for occupants within 100 feet of the source. No occupied residential structures would be nearer than 500-feet to the proposed project facilities. At this distance, construction vibration would not be felt by residences at a level considered annoying Project-related vibrations would not cause adverse physical effects to structures, because no structures susceptible to damage are known to be nearby. During operation, there would be no sources of potential vibration that could be perceptible in the surrounding area.

**Operation and Maintenance**. Operations-related activities that could cause minor levels of noise in the areas of the proposed Project include upkeep, maintenance, inspections, vegetation management, solar module washing, fire safety, and site security. The proposed Project would also include stationary sources of noise in the form of PV panel tracking system motors, the inverter-transformer stations that operate when the solar panels produce electricity in the daytime, BESS, and the 500 kV gen-tie line.

Throughout the solar field, the equipment that could generate the most prominent stationary source noise would be the pad-mounted inverter-transformer stations. The off-site noise levels produced by the individual inverters and transformers would depend on the final equipment selected and the ultimate locations of the individual inverter stations. The typical performance specification of a commercial or utility-scale inverter with cooling system and enclosure would be to achieve a design standard of 67 dBA at a distance of 32.8 feet (10 meters). With multiple units on each skid to achieve up to a 5,000-kilowatt output, the resulting noise level would be approximately 71 dBA at 50 feet and 45 dBA Leq at 1,000 feet from each inverter-transformer pad. Noise levels from tracker motors and actuators throughout the solar field would not be discernable in the background conditions at any locations over 200 feet from the edges of the solar field (see Appendix I, Noise Calculations).

The dominant stationary sources of noise near the proposed operation and maintenance (O&M) building would be related to the heating, ventilation, and air conditioning units (HVAC), if necessary for the O&M building and the BESS enclosures. The transformers and switchgear to within the onsite substation yards would also include cooling fans and pumps. Typical cooling systems for the BESS and transformers could generate 75 dBA at a distance of 32.8 feet (10 meters), which would result in 44 dBA Leq at 1,200 feet from the BESS equipment (see Appendix I, Noise Calculations).

The proposed Project would be operated by up to ten permanent staff on the site at any one time. Occasional vehicular noise would also be caused by crews for ongoing facility maintenance and repairs and for module washing and security patrols. These activities would normally involve only a small crew, and the Project-related O&M traffic would be sporadic.

**Alternative 3: Reduced Acreage Alternative**

The Reduced Acreage Alternative (Alternative 3: App. A, Fig. 2-9) would remove approximately 50-acres of solar panels closest to the community of Lake Tamarisk. The reduction in acreage would increase the distances to sensitive receptors from the proposed Project sources of noise and vibration. The decrease in solar panel area would result in a slight decrease in the potential for sensitive receptors to be exposed to noise and vibration near the existing community of Lake Tamarisk when compared with the impacts of the proposed Project.

Alternative 3 would reduce the noise and vibration levels experienced by sensitive receptors and reduce the noise and vibration impacts when compared to the proposed Project. As with Alternative 2, noise levels caused by typical activities within the site would be substantially lower when experienced at locations distant from the site boundaries. Because sound fades over distance, on-site noise would diminish over the additional distances separating noise sensitive receptors from the proposed activities. Since the distance between construction and the Lake Tamarisk community would be increased in Alternative 3, the noise level caused would be less. Assuming the standard spherical spreading loss (reduction of 6 dB per doubling of distance) and the highest unmitigated construction noise source of 83 dBA Leq at 50 feet, the noise level caused by a typical spread of construction equipment would be 51 dBA Leq at the nearest occupied residences in the Lake Tamarisk community, 2,350 feet from the nearest proposed construction. The nearest receiver locations would not be exposed to noise levels exceeding the reasonable daytime 80 dBA Leq or the nighttime 70 dBA Leq thresholds during construction activities. (EA App. A, Figure 3.3-1) Overall, the effects of Alternative 3 would be slightly reduced from the proposed Project, and mitigation identified for the proposed Project would be the same under this alternative.

**Alternative 4: Community Buffer Alternative**

The Community Buffer Alternative (EA App. A, Figure 2-10) would be located within the Project footprint and be like the Proposed Action, however, all panels would be removed within 1.5 miles to the east, 2 miles to the northeast, and 1 mile north of the nearest existing Lake Tamarisk Desert Resort. With the setback, approximately 530 acres would not be developed with solar panels compared to the Proposed Action and 480 acres not developed compared to the Reduced Acreage Alternative (with the 50 acres of solar panel already removed). Underground medium voltage 34.5 kV lines may need to cross within the setback area to connect the solar facility development areas to the onsite substation. This alternative includes the construction of two earthen berms to screen the view of the solar facility from Lake Tamarisk Desert Resort, and would relocate the Project's substation, BESS facility, and O&M building approximately 1.25 miles northeast of the substation site in the Proposed Project.

The relocation of the Project substation, BESS, and O&M building to an area adjacent to Hwy 177 would increase the length of the Project's gen-tie line to approximately 8.15 miles over the 6.7-mile length of the Proposed Project. The gen-tie line would be routed through the project site and around a private land parcel for 0.45 miles, then crossing to the east side of Hwy 177 and proceeding in s southerly direction for 2.3 miles, before proceeding east within the Oberon Solar Project to the Oberon Switchyard. Routing the gen-tie line across the Project site would increase the gen-tie length by 1.45 miles, as compared to the Proposed Project.

Like the Alt. 3. Reduced Acreage Alternative, this alternative would remove approximately 50-acres of solar panels closest to the community of Lake Tamarisk. The reduction in acreage would increase the distances to sensitive receptors from the proposed Project sources of noise and vibration. The decrease in solar panel area would result in a slight decrease in the potential for sensitive receptors to be exposed to noise and vibration near the existing community of Lake Tamarisk when compared with the impacts of the proposed Project. However, there may be a short-term effect in this area during placement of the underground medium voltage 34.5 kV lines crossing within the buffer area if determined necessary.

Alternative 4 would reduce the noise and vibration levels experienced by sensitive receptors and reduce the noise and vibration impacts when compared to the proposed Project. As with Alternative 2, noise levels caused by typical activities within the site would be substantially lower when experienced at locations distant from the site boundaries. Because sound fades over distance, on-site noise would diminish over the additional distances separating noise sensitive receptors from the proposed activities. Since the distance between construction and the Lake Tamarisk community would be increased in Alternative 4, the noise level caused would be less. The noise level caused by a typical spread of construction equipment would be 45 dBA Leq at the nearest occupied residences in the Lake Tamarisk community, 4,641 feet from the nearest proposed construction. Using a helicopter for 15 minutes in a typical hour would result in approximately 66 dBA Leq at 4,641 feet. The nearest receiver locations would not be exposed to noise levels exceeding

the reasonable daytime 80 dBA Leq or the nighttime 70 dBA Leq thresholds during construction activities (EA App. A, Figure 3.3-1). Overall, the effects of Alternative 4 would be slightly reduced from the proposed Project, and mitigation identified for the proposed Project would be the same under this alternative.

### 3.3.4 Cumulative Effects

Noise sources attributable to cumulative projects may cause adverse effects within approximately one mile of a project site including truck routes, but the region of greatest influence is typically within 0.5 miles from the boundary of a project site. Similarly, vibration sources that typically occur with construction activity or vehicle traffic have a region of influence that is limited to approximately 200-feet. The geographic scope for cumulative noise and vibration effects includes the West-wide Section 368 Energy Corridors and the development activities of existing, past, present, and reasonably foreseeable future projects in the Desert Center area.

Limited areas of cumulative project construction activities could be within 0.5 mile of the proposed Project. Simultaneous construction activity would have the potential to cause overlapping construction noise impacts with construction of the proposed Project. Active pieces of construction equipment normally cause no more than 85 dBA when measured 50 feet from the source. Construction-phase noise impacts would be short-term and limited in nature, with construction activities for all cumulative projects normally being limited to the daytime. The duration of construction work for the proposed Project would be approximately 20 months, and after that time, few notable permanent sources of noise would occur with the proposed solar facility, BESS, and gen-tie and the cumulative projects.

The Proposed Action would be built near other projects within the geographic scope for noise and vibration. The noise and vibration effects of the equipment used for construction of the proposed solar facility and gen-tie line may overlap spatially and temporally with other similar projects, such as the Sapphire Solar Project, adjacent to the Easley Project and presently under review by the BLM and Riverside County. This project is a proposed 117 MW solar PV project on private land. The gen-tie line would cross BLM-administered land to connect into Desert Harvest Substation/Red Bluff Substation. The noise and vibration effects of the equipment used for construction of other present and future cumulative projects would depend on the site-specific needs and schedules, and the impacts may or may not overlap spatially and temporally with those of the Project. This is consistent with the analysis in DRECP FEIS Section IV.25.3.21 (page IV.25-103) which notes that cumulative projects, in particular in the Desert Center region, could result in cumulative noise during construction. Cumulative noise impacts would be reduced through compliance with local laws and regulations, implementation of typical mitigation, and implementation of the Health, Safety, and Noise Plan (POD Appendix T) to protect sensitive receptors from noise and implement feasible noise controls.

Cumulative noise impacts would be reduced through compliance with local laws and regulations and implementation of typical mitigation to protect sensitive receptors from noise and implement feasible noise controls. Cumulative renewable energy projects and other development that is subjected to the environmental permitting process would have a detailed analysis of noise and land use conflicts as part of the project-level environmental review. The permitting process normally requires each project to comply with local standards and to avoid noise-related land use conflicts. This means that all projects, even if unrelated to the proposed Project, would need to comply with the local community noise standards, such as the Riverside County Noise Ordinance #847. Additional mitigation may be applied to the cumulative projects through environmental permitting by lead agencies. Although sources of noise associated with cumulative project operations, including employee vehicles accessing the sites, power inverters, and other power system infrastructure could impact residences that are near the proposed Project, the mitigation recommended in this analysis would ensure that the Project's incremental contribution to the cumulative noise impact would not be considerable.

The primary sources of noise associated with solar facility operations that could combine with the cumulative projects to result in a potential cumulative impact near sensitive receptors would be employee vehicles accessing the site. Given the limited number of employees during operations of the proposed

project and the nearby cumulative projects, the cumulative operational noise impact would not be cumulatively significant.

Cumulative effects due to ground-borne vibration would occur only if there were sources of the vibration within approximately 200 feet from the boundaries between the Project site and cumulative project sites. Boundaries of cumulative projects occur within 200 feet of the proposed Project site, but these shared boundaries are not within 200 feet of existing residences. The areas of potential overlap of cumulative project construction-related vibration would not be likely to create a cumulative vibration impact at residences near the proposed Project, and no cumulative effects would be likely from ground-borne vibration.

Mitigation Measures MM N-1 to MM N-3 would be implemented to address potential noise and vibration impacts for the proposed Project. No additional mitigation is required.

Given compliance with noise standards, implementation of mitigation, the areas of potential overlap of noise and vibration and cumulative project construction-related effects would not be likely to create a cumulative noise or vibration impact at residences near the Proposed Action, and no cumulative effects would be likely from noise or vibration.

## 3.4 Issue 3: Vegetation and Wildlife Resources

### 3.4.1 Vegetation and Wildlife Resources Issue Statement and Methodology for Analysis

*Would the project affect plant species and native plant communities, including microphyll woodlands, either directly or indirectly, including through degradation or habitat loss?*

*Would the project affect federally listed and special status plants, fish, wildlife, either directly or indirectly, including through degradation or loss of habitat?*

The impact analysis analyzes potential direct, indirect, and cumulative impacts of the proposed Project on vegetation and wildlife resources. The analysis also considers the potential for incremental impacts of the Project to combine with impacts of other projects and activities to adversely affect biological resources in the area. Conservation Management Actions (CMAs), identified in the DRECP, and mitigation measures are identified to avoid or reduce potential impacts, and the potential for residual impacts is evaluated.

### 3.4.2 Affected Environment

This section of the EA summarizes the vegetation and wildlife resources at the project site as described in the Biological Resources Technical Report, Easley Solar Project, Riverside County, California (BRTR), prepared by Ironwood Consulting Inc. in November 2023 (Ironwood, 2023). The BRTR is provided for reference in POD Appendix G, which is included within Appendix E of this EA. Full coverage wildlife surveys and focused special-status plant surveys were performed in fall 2019 through spring of 2022 on all portions of the project site.

Appendix M presents detail on the affected environment, including the following topics:

- Vegetation and Habitat
- Threatened and Endangered Species
- Other Special-Status Plants
- Threatened and Endangered Wildlife
- Other Special-Status Wildlife
- Wildlife Movement

### 3.4.3 Direct and Indirect Environmental Effects

The analysis is based on the biological resources observed at the proposed project site, as described in the BRTR (POD Appendix G in EA Appendix E) and included data from CNDDB queries and recent surveys. The analysis is also based on the description of the Proposed Action and other alternatives, and the analysis presented in the DRECP FEIS (BLM, 2015).

A summary of impacts from the solar facility and gen-tie footprint to desert dry wash woodland, and desert tortoise critical habitat are presented in Table 3.4-1.

**Alternative 1: No Action**

Under the No Action Alterative, the project would not be constructed. The BLM would continue to manage the proposed project site according to the existing land use designations and current level of impacts to vegetation and wildlife would continue to occur across the project site. The lands within the DFA would remain open to future solar project or linear facilities.

**Alternative 2: Proposed Action**

The Proposed Action would result in direct and indirect effects to vegetation and wildlife during construction and operation of the project, which is consistent with Section IV.7.2.1.2 (page IV.7 23) of the DRECP FEIS that discusses the removal of vegetation and loss of habitat for wildlife species with construction and decommissioning of renewable energy generating and transmission projects. Except for minor incursions by gen-tie and collector lines and access roadways, each of the project development alternatives would avoid desert dry wash woodland with the required 200-foot buffer mapped microphyll woodland and would be located within the surrounding 200-foot setback area as required by CMA LUPA-BIO-3 (see EA Appendix F for detailed description). To avoid placing PV panels in these areas, the project design for all project development alternatives relocated some panels into a designated utility corridor and arranged the PV arrays in a form-fitting manner to avoid desert dry wash woodland and their surrounding setback areas. The roads that remain in the setback areas will be used irregularly (approximately once per quarter annually) and only in connection with required maintenance and emergency repairs. The direct and indirect effects would be avoided (except for minor incursion as defined by the DRECP LUPA), minimized, or offset by adherence to DRECP CMAs to reduce the effects. Where CMAs do not reduce the effects, other mitigation measures that would avoid or reduce adverse effects are considered. The full text of all mitigation measures and applicable CMAs is included in EA Appendix F.

**Vegetation and Habitat**

The Proposed Action would have a long-term impact on native habitats by removing or substantially altering the soils and vegetation. This is consistent with the analysis in the DRECP FEIS Section IV.7.3.2.1 (page IV.7-114), which notes that approximately 52,000 acres of desert scrubs would be anticipated to be impacted by renewable development and notes that CMAs would help avoid and minimize the effects.

There are two primary natural vegetation communities (creosote bush scrub and desert dry wash woodland) as well as one distinct natural habitat type (desert pavement). One vegetation community (desert dry wash woodland) is identified by BLM and the California Department of Fish and Wildlife (CDFW) as sensitive, as described below under Sensitive Vegetation Communities.

Two areas of wetlands were identified on the Project site and are associated with adjacent aquaculture and agriculture activities. The wetland areas provide supportive soil conditions for the establishment of tamarisk. The aquatic resources in the Project site are subject to state jurisdiction under regulations by Regional Water Quality Control Boards (RWQCBs) and CDFW.

Long-term impacts would include vegetation removal and soil disturbance and loss of native habitats. During construction, the project would affect surrounding habitat by introducing noise and lighting, which may affect wildlife behavior in the short-term, as wildlife may try to avoid these construction-related nuisances. Dust generated from project construction could affect plant processes, such as photosynthesis,

however dust control activities are required to reduce fugitive dust plumes from extending beyond the property lines. Other activities could attract wildlife to the project site during construction. Water used for dust control and food related trash generated by workers could attract wildlife to the site during construction.

In accordance with DRECP CMA LUPA-BIO-COMP-1, impacts to specified biological resources, including suitable plant and wildlife habitat and federally designated Critical Habitat, are to be compensated for by the Applicant. The minimum compensation acreage requirements are included in MM BIO-5b in EA Appendix F and in Table 3.4-1. The compensation acreage requirements would be adjusted as needed based on the footprint of the approved alternative, final engineering, and/or any future modifications during implementation.

**Table 3.4-1. Easley Project Compensation Acreages (Estimated. Final Acres to be Determined)**

| IMPACT | Easley Project (acres) |
|---|---|
| Sonoran creosote bush scrub impact (outside desert tortoise critical habitat) | 1,481.4 |
| Desert pavement impact | 52 |
| Desert dry wash woodland impact (direct) | 31.4 |
| Desert tortoise critical habitat impact | Up to 20 |
| **COMPENSATION** | |
| Sonoran creosote bush scrub compensation (outside of desert tortoise critical habitat) (1:1) | |
| Desert pavement compensation (outside of desert tortoise critical habitat) (1:1) | |
| Dry desert wash woodland (direct; inside and outside of desert tortoise critical habitat) (5:1) | |
| Desert tortoise critical habitat compensation (not including desert dry wash woodland) (5:1) | |
| **COMPENSATION TOTAL** | **TBD** |

While chemical control with herbicides may be necessary to control the spread of noxious weeds, non-native and invasive species following construction, herbicide use may pose risks to native vegetation and wildlife. Use of BLM-CA approved herbicides would minimize risk. For details, see Pesticide and Herbicide Use, below.

These direct and indirect impacts to habitat would be minimized through mitigation measures as detailed in EA Appendix F. Habitat compensation through acquisition of compensation lands, revegetation of short-term impact areas, pre-construction surveys and marking of sensitive resources for avoidance, implementing management plans, and construction crew training are identified in MMs BIO-1 through BIO-7.

The process for chemical control treatments of noxious weeds, invasive and non-native plants is described in an Integrated Weed Management Plan (IWMP) (see MM BIO-4 and POD Appendix N), followed by a Pesticide Use Proposal (PUP) for specific chemical treatments, both approved by the BLM.

Revegetation of temporarily impacted areas would be conducted in accordance with a Vegetation and Resources Management Plan (MM BIO-5). Compensation for impacts to desert dry wash woodland and desert tortoise critical habitat would be mitigated at a ratio of 5:1 (MM BIO-5a and MM BIO-5b) in compliance with DRECP CMA LUPA-BIO-COMP-1.

Implementation of CMAs and MMs would reduce and offset the impacts of the proposed project on vegetation and habitat.

***Sensitive Vegetation Communities***

One vegetation community, DDWW, is identified by BLM and CDFW as sensitive due to the association with alluvial processes, which results in habitat that supports greater food, nesting, cover, and wildlife diversity than the surrounding desert. The Project would comply with DRECP CMAs by avoiding DDWW with a 200-foot setback, except for minor incursions (linear features with minimal ground disturbance) to be determined during final design. Impacts to dry washes, wetlands, and DDWW are subject to authorization by the CDFW under the California Fish and Game Code.

MM BIO-5b requires off-site compensation for DDWW at a ratio of 5:1. The project's proposed compensatory habitat package includes at least 5,550 acres of off-site habitat, including at least the required 425 acres of microphyll woodland habitat to mitigate for the eighty-five acres directly impacted as dictated under the DRECP CMA LUPA-BIO-COMP-1.

Additional mitigation measures would be implemented to further minimize and avoid impacts to DDWW and its setback. MM BIO-1 to MM BIO-4 require pre-construction surveys and marking of sensitive resources, revegetation and invasive species management plans, and construction crew training, which would reduce direct and indirect impacts to vegetation.

Avoidance of DDWW in the project area and preservation of off-site habitat would reduce and offset direct impacts to DDWW. DDWW was avoided, except for minor incursions. Impacts to DDWW habitat would be avoided and minimized with implementation of mitigation measures, and direct loss of DDWW would be compensated offsite at a ratio of at least 5:1 as required by the DRECP.

***Impacts of Pesticide and Herbicide Use on Vegetation***

Chemical control through the use of herbicides kill or inhibit plant growth and can be highly effective in controlling many invasive plants. Different invasive plant species may require different herbicides, application rates, and times of application. Application of herbicides, as specified in the IWMP, would involve controlled applications, and not broadcast treatments. Chemical treatment with herbicides known to have residual toxicity, such as pre-emergent plants, may be used. To reduce potential indirect impacts associated with herbicide application, only the following application methods are anticipated to be used: wick (wiping onto leaves); cut stump; basal bark girdling; and foliar spot spraying with backpack sprayers or pump sprayers at low pressure or with a shield attachment to control drift, and only on days with winds not exceeding 10 mph, or with a squeeze bottle for small infestations.

The environmental risks of using herbicides would be minimized by using BLM-CA approved marker dyes to make the herbicide visible in areas where it has been applied. Marker dyes used would not have toxic environmental effects independent from the associated herbicides. Higher visibility is desirable because it allows personnel to protect themselves more effectively against contamination; prevents unintended multiple application to a particular area or plant; ensures complete coverage of the target area and plants; and informs personnel of overspray and wind-drift issues, which protects non-target plants.

Herbicides may be used on site during construction and O&M to control the spread of noxious weeds, non-native and invasive species. Chemical control would involve the targeted use of BLM-CA approved herbicides and adjuvants applied to foliage using backpack sprayers as outlined in the IWMP (see POD Appendix N). Pesticide use would be in accordance with an approved Pesticide Use Proposal (PUP).

This EA tiers to BLM's *Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Final Programmatic Environmental Impact Statement (PEIS)* (BLM, 2007), which analyzes the impacts of using chemical control (herbicides) to treat weeds and manage vegetation on public lands. The PEIS identifies impacts to the environment associated with herbicide use, appropriate best management practices, standard operating procedures (SOPs), mitigation measures, and conservation measures for avoiding or minimizing adverse impacts.

Overall effects of noxious weeds, non-native and invasive species management on native vegetation would be beneficial. Removal of noxious weeds, non-native and invasive species will improve suitable foraging,

nesting, and migratory habitat; reduce non-native seed dispersal from each treated area; and allow native species to recolonize.

However, herbicides can pose risks to native vegetation. Several terrestrial herbicides are non-selective and could adversely impact non-target vegetation. Accidental spills and herbicide drift from treatment areas could be particularly damaging to non-target vegetation and could reach non-target vegetation on public or private lands near treatment areas.

The impacts of pesticide use to wildlife were analyzed in the PEIS (pages 4-118 through 4-124). The proposed project would have an overall beneficial effect on wildlife (including listed and other special-status species) because it would prevent the habitat degradation and loss of native forage that would result if noxious weeds, non-native or invasive plants were introduced and spread in and outside of the project area. Herbicides that persist on site could adversely affect animals that feed on target plants or are exposed to the herbicides (e.g., by digging or rolling in treated soil). The IWMP specifies usage parameters to prevent potential risks, including specific measures to avoid application in the vicinity of native vegetation or special-status wildlife forage plants, and to avoid overspray or spillage in any areas.

According to the PEIS, field studies suggest that appropriate herbicide use is not likely to have significant direct toxicological effects on wildlife. Based on the analysis in the PEIS (pages 4-118 through 4-123) and the Vegetation Treatment BA (page 2-7 through 2-22), which was based upon Ecological Risk Assessments (ERAs) from both BLM and Forest Service, risks to terrestrial wildlife from invasive plant treatments using the proposed herbicides range from no risk to moderate risk from direct spray and ingestion of contaminated vegetation or prey (BLM, 2007a). Chemical use proposed to control noxious weeds, non-native and invasive species on the project site would exclusively be BLM-CA approved herbicides and adjuvants that have been analyzed in the PEIS (BLM, 2007). These herbicide formulations include chlorsulfuron, clopyralid, glyphosate, imazapyr, and triclopyr, all of which are described in greater in the associated IWMP. Herbicides that represent the lowest risk for negative effects to sensitive species present on site would be prioritized.

Following the most current manufacturer's label, the IWMP specifies application rate parameters and handling instructions to minimize potential risks, including ways to minimize impacts to native vegetation or special-status plants, and to avoid overspray or spillage in any areas. Additionally, the IWMP and EA Table 2-4 specify proposed usage and formulations of herbicides for the project and would incorporate all applicable SOPs for applying herbicides listed in EA Appendix H.

Noxious weeds, non-native and invasive species treatment and control would occur as needed and recommended by the project's Weed Management Biologist. Monitoring for weeds will be conducted twice annually throughout construction, operations, and decommissioning phases as required by the IWMP to identify noxious weeds, non-native and invasive plants that may be present during various times of the year. Only adjuvants and herbicides approved for use in California and detailed in the IWMP/PUP would be used on BLM lands associated with this project. Herbicide usage would not result in any new adverse impacts, or impacts of greater magnitude, than those described in detail in the 2007 Vegetation Treatments PEIS (BLM, 2007) (see EA Section 1.5). Overall effects of invasive plant management on wildlife would be beneficial.

With implementation of mitigation measures, including the IWMP and the PUP, impacts to native, desirable vegetation from use of herbicides would be minimized. Overall effects of noxious weeds, non-native and invasive plant management on native vegetation and habitat would be beneficial.

**Special-status Plants**

***Threatened and Endangered Plants***

No effects to State or federally listed threatened or endangered plants would occur, as they do not occur in the project site.

### *Other Special-Status Plants*

No BLM sensitive plants were observed on the project site.

One CRPR 2B.2 plant also listed in the DRECP as a Special Vegetation Feature, Crucifixion thorn, was documented on the project site. One individual was observed. Additional suitable habitat for Crucifixion thorn is located within washes in the project area. No additional occurrences have been observed on the project site. The known individual Crucifixion thorn is located along the northern boundary of the site and is outside of the development footprint would be avoided.

One CRPR 3.2 plant, California ditaxis, occurs in the Project site and was recorded in forty-three locations during spring 2022 surveys (BRTR in POD Appendix G, EA Appendix E). Two of these locations will be directly impacted by the private land development and there are four records adjacent to the private lands, but outside of the impact boundaries (on BLM land). All plants recorded on BLM land are outside of the development footprint and will not be impacted.

One CRPR 4.2 plant, Utah milkvine, occurs on the Project site. One individual was observed, and suitable habitat exists throughout the Project site. One CRPR 4.3 plant, Desert unicorn plant, was observed at 223 locations throughout the site during surveys.

Suitable habitat for glandular ditaxis (CRPR 2B.2) and spiny abrojo (CRPR 4.3) is located within the Project area but were not observed. No other special-status plant species were observed.

## Wildlife, Including Special-status Wildlife

### *Threatened and Endangered Wildlife*

Potential project impacts to species are analyzed below:

**Desert Tortoise.** Desert tortoise sign (class 4 and 5 carcasses) have been observed primarily in the eastern portion of the project site in desert dry wash woodland, with carcasses observed in the western portion, as presented in Section 3.5.2 (Affected Environment).

The 2017 5-year review for desert tortoise (USFWS, 2017) describes the BO (USFWS, 2016) issued for the DRECP LUPA. USFWS acknowledged that approximately 11,290 acres of modeled desert tortoise habitat within the DFAs would eventually be developed for renewable energy. The modeled habitat is based on a 0.5 threshold for suitable desert tortoise habitat (Nussear et al 2009). USFWS also notes that the DRECP LUPA increased the amount of land managed for conservation by approximately 2.5 million acres (USFWS, 2017). The DRECP LUPA FEIS described that some desert tortoise critical habitat would be impacted if renewable energy were constructed in the DFAs, assuming up to 8,000 acres of disturbance to desert tortoise critical habitat (DRECP FEIS Section IV.7.3.2.1, page IV.7-134). USFWS concluded that the DRECP LUPA was not likely to jeopardize the continued existence of the desert tortoise, and would benefit its recovery (USFWS, 2016; 2017).

The BO concludes, “because of the nature of the habitat in this area, the minor overlap of portions of the East Riverside DFA and the Chuckwalla critical habitat unit would not have a measurable effect on the ability of the critical habitat to support viable populations or to provide for movement, dispersal, and gene flow.” Additionally, the project would meet the CMA requirement to mitigate critical habitat loss at a 5:1 ratio, which would offset direct impacts to critical habitat.

Since the completion of the 2021, 5-year review (USFWS, 2021), the USFWS has issued biological opinions related to renewable energy development. While USFWS notes that the development of large solar facilities has reduced the amount of habitat available to desert tortoises, these biological opinions concluded that proposed solar plants were not likely to jeopardize the continued existence of the desert tortoise because they were primarily located outside of critical habitat and areas of critical environmental concern that contain most of the land base required for recovery of the species and because the actions included numerous measures intended to protect desert tortoise consistent with the recommendations in the desert tortoise recovery plan.

With the implementation of DRECP CMAs LUPA-BIO-IFS-4, LUPA-BIO-IFS-5, LUPA-BIO-IFS-8, and LUPA-BIO-IFS-9 and the project-specific mitigation measures in EA Appendix F, the Proposed Action would minimize mortality or injury to desert tortoises present in the project area during construction, O&M, and decommissioning activities. As allowed in DRECP CMA LUPA-BIO-IFS-4, the BLM and USFWS would need to grant an exemption or variance to conduct desert tortoise clearance surveys in a limited area (300-acres plus buffer) outside of the desert tortoise activity period.

MM BIO-7 includes an option of permanent desert tortoise exclusion fencing around each solar facility or a monitoring and avoidance program to minimize potential impacts to desert tortoise onsite during O&M and ensure that any take of desert tortoise during O&M would be in accordance with an approved Incidental Take Permit.

Desert tortoises, eggs, or burrows could be harmed during clearing or grading activities. Tortoises could become entrapped within open trenches and pipes. Construction or O&M activities could also result in direct mortality, injury, or harassment of tortoises or loss of eggs due to vehicle strikes. Other direct effects could include individual tortoises or eggs being crushed or entombed in their burrows, disruption of tortoise behavior during construction or operation of facilities, and disturbance by noise or vibrations from heavy equipment. Desert tortoises may also be attracted to the construction area by shade beneath vehicles, equipment, or staged construction materials, or the application of water to control dust, placing them at higher risk of injury or mortality. This is consistent with the analysis in the DRECP FEIS Section IV.7.3 (page IV.7-23 and IV.7-24 for general impacts from renewable development and page IV.7-127 for impacts in the specific area of the Proposed Action) regarding impacts to desert tortoise in the Cadiz Valley and Chocolate Mountains area.

Construction and operation could create "subsidies," such as food, water, nest sites, or perch sites, for common ravens or other opportunistic predators. Ravens prey on juvenile desert tortoises, contributing to an overall decline in tortoise recruitment. Other effects could include the introduction and spread of invasive weeds and increased human presence. A Raven Management Plan is included in POD Appendix J in EA Appendix E (POD). This is consistent with the analysis in the DRECP FEIS Section IV.7.3.2.1 (page IV.7-155) which highlights the increased predation of listed and sensitive wildlife species attributed to ravens.

Direct and indirect impacts to desert tortoises would be minimized through avoidance of desert dry wash woodland habitats (except for minor incursions) and implementation of MM BIO-7 (Desert Tortoise Protection) which is consistent with CMA LUPA-BIO-IFS-4 and -5 and requires a USFWS Authorized Biologist be present onsite during construction to conduct or direct pre-construction clearance surveys for each work area, direct Biological Monitors to watch for tortoises wandering into the construction areas, check under vehicles, and examine excavations and other potential pitfalls for entrapped animals. The Authorized Biologist will be responsible for overseeing compliance with desert tortoise protective measures and for coordination with the project's Lead Biologist. The Authorized Biologist shall have the authority to halt all project activities that are in violation of these measures or that may result in take of a desert tortoise.

No desert tortoise would be handled or relocated without authorization from USFWS and CDFW. An incidental take authorization from both agencies would be obtained to address any potential take of desert tortoise, including authorization to handle or translocate desert tortoise. Desert tortoises would be handled or translocated according to a Desert Tortoise Relocation Plan, pending approval by both agencies. Once an alternative is selected, the BLM will initiate consultation under Section 7 of the Endangered Species Act. The Applicant will apply for incidental take authorization from CDFW under the California ESA (CESA) Section 2081 which requires review under CEQA.

The project would impact nearly 20- acres of the Chuckwalla CHU. This impact is consistent with the DRECP FEIS Section IV.7.3.2.1 (page IV.7-134) which notes that approximately 8,000 acres of impacts to desert tortoise critical habitat could result from development of renewable energy and transmission including in the Chuckwalla CHU. MM BIO-5b would require habitat compensation for impacts to federally designated critical habitat at a ratio of 5:1.

The conditions found within the onsite and compensation site critical habitat areas were compared using the USFWS Physical and Biological Features (PBFs) of critical habitat. PBFs are specific elements of physical or biological features that provide for a species' life-history processes and are essential to the conservation of the species. The desert tortoise PBF criteria are used by USFWS to place lands within critical habitat designation. The DRECP BO (BLM, 2016) discusses three PBFs in the context of the Chuckwalla CHU and determines that they are not measurably affected by development in the overlap part of the CHU. The BO notes the fragmentation effect of the freeway on CH and that boundaries were drawn along section lines (rather than habitat features). The BO concludes: "[b]ecause of the nature of the habitat in this area and the fact that the Bureau will require the maintenance of wildlife corridors in this area, the minor overlap of portions of the East Riverside DFA and the Chuckwalla CHU would not have a measurable effect on the ability of the CHU to support viable populations or to provide for movement, dispersal, and gene flow. The maximum acreage of overlap is approximately 4,498 acres; however, because the [BLM] (2015c, page II.3169, CMA LUPA-BIO-13) will maintain substantial wildlife corridors in this region, the actual amount of disturbance to Chuckwalla CHU would be substantially less." (Note that the Easley Project design supports general wildlife movement through the area, consistent with CMA LUPA-BIO-13.)

**Listed Birds.** There is no suitable nesting habitat on or near the project site for four federally listed bird species known from the vicinity (western yellow-billed cuckoo, southwestern willow flycatcher, least Bell's vireo, and Yuma Ridgway's rail); therefore, there would be no direct or indirect effects to nests, nest success, or nesting habitat. Three of the species, western yellow-billed cuckoo, least Bell's vireo, and Yuma Ridgway's rail, exhibit migratory or movement behavior through the California desert and may use the site for foraging and resting during migratory stopovers (USFWS, 2016). Direct removal of vegetation and habitat on the project site would reduce availability of stopover foraging habitat. Indirect impacts would include increased noise, dust, light, and activity, which may impact migratory or foraging behavior. After completion of construction and throughout the life of the Project, the solar facilities and other Project components may present a collision or electrocution risk to birds.

Impacts to resident and migratory birds would be avoided and minimized with implementation of mitigation measures. Implementation of MMs BIO-1 through BIO-5, which require habitat compensation, revegetation of temporary impact areas, pre-construction surveys and delimiting sensitive resources, areas, implementation of management plans, and construction crew training, would minimize and offset adverse impacts to native vegetation, thereby minimizing impacts to bird and bat habitat. MM BIO-6 (Wildlife Protection) would minimize impacts to birds through site inspections, prevention of attractants such as trash or water, hazardous material avoidance, and vehicle speed limits. MM BIO-9 requires a Bird and Bat Conservation Strategy (BBCS) that will identify potential hazards to birds and bats during O&M, implement nesting bird surveys prior to construction per a separate Nesting Bird Management Plan (NBMP), and include monitoring, avoidance of nesting seasons, and documentation of bird and bat mortality during O&M.

**Swainson's Hawk.** The project site provides potential migration season foraging habitat for Swainson's hawk; no Swainson's hawk was observed during biological resources surveys or avian counts. The site is located approximately 200 miles outside the nesting range in California desert habitats. Loss of foraging habitat would be mitigated and offset through MM BIO-5 (Vegetation Resources Management Plan which requires compensation for permanent impacts to native vegetation and habitat. Impacts due to potential collision and electrocution are discussed below under Protected Birds and Bats and would be minimized with MM BIO-8 (Bird and Bat Conservation Strategy) and MM BIO-10 (Gen-tie Lines).

**Gila Woodpecker.** Desert wash woodlands on the solar facility site may provide suitable nesting and foraging habitat for Gila woodpecker. Although no Gila woodpecker observations were made during surveys, there is at least a low probability that they may nest in desert wash woodland habitat on or near the project site, which is near the western margin of the Gila woodpecker's range.

Mitigation measures would be implemented to minimize impacts to vegetation and habitat and special-status birds, as described previously for Riparian Birds.

***Other Special-status Wildlife***

**Protected Birds and Bats.** Special-status birds and bats use habitats in the project area, including golden eagle (foraging only) (CFP, WL, BCC, BLMS), western burrowing owl (State SSC, BLMS), pallid bat (SSC, BLMS), Townsend's big-eared bat (SSC, BLMS), western mastiff bat (SSC, BLMS), western yellow bat (SSC), California leaf-nosed bat (SSC, BLMS), big free-tailed bat (SSC), and pocketed free-tailed bat (SSC).

The project would directly remove foraging, nesting, and burrow habitat and indirectly impact protected birds and bats due to increased noise, dust, activity, and disturbance during project construction and operation. Impacts to raptors and golden eagles would include loss of foraging habitat. Impacts to burrowing owls could include direct mortality from mechanical crushing of individuals or burrows by vehicles and construction equipment. New structures such as fencing, solar panels, and the gen-tie line could introduce nest or perch sites for opportunistic predators that could prey on some special-status wildlife or compete with other special-status species. The aforementioned potential direct and indirect effects to birds and their habitat are consistent with the discussion in DRECP FEIS Section IV.7.3.2.1 (page IV.7-127), which notes birds and suitable habitat. Further discussion of details of species impacts and bird collision and electrocution are included below.

Implementation of mitigation measures, as described for listed birds, would minimize impacts to special-status birds and bats. MMs BIO-1 through BIO-5 would minimize and offset adverse impacts to native vegetation, thereby minimizing impacts to bird and bat habitat. MM BIO-8 would minimize impacts with pre-construction surveys. The MM BIO-9 Nesting Bird Management Plan (NBMP) under MM BIO-8 includes requirements for nest surveys, avoidance, and protection. The Bird and Bat Conservation Strategy (BBCS) per MM BIO-8 will implement monitoring and documentation of bird and bat mortality during O&M. MM BIO-11 (Burrowing Owl Avoidance and Relocation) requires a relocation plan for burrowing owl.

*Golden Eagle*. The site does not provide suitable golden eagle nesting habitat. However, the site provides suitable foraging habitat, and is within potential foraging distance of known golden eagle nesting territories located in the Eagle Mountains and the Coxcomb Mountains. Golden eagles may be at risk of collision with gen-tie lines due to their large size.

Foraging habitat loss may affect golden eagles during nesting, winter, or migratory seasons.

*Western Burrowing Owl.* Burrowing owls, burrows, and sign were observed at the project site and suitable habitat is present. Potential direct project impacts to burrowing owls include mechanical crushing of individuals or burrows by vehicles and construction equipment, habitat loss, and noise and disturbance to surrounding habitat.

*Special-Status Bats*. Several special-status bats could use the project site for foraging. There is limited roosting potential on the project site in the dry wash woodland habitat. No active bat roosts were documented on the Project site during surveys. Project construction could adversely impact special-status bats through the elimination of desert shrubland foraging habitat and desert dry wash that has potential for roosting.

Solar energy development is a relatively new anthropogenic feature for bats to encounter, and responses are not well studied. Ongoing studies have shown that bats are susceptible to collisions with moving structures such as wind turbines, but infrequently collide with stationary structures (WEST, 2020). Bat mortality could also occur if individuals became trapped in other infrastructure. Bat carcasses were rarely detected at utility-scale PV solar energy facilities that have been monitored. It is anticipated very few bat fatalities will occur during the life of the project based on the absent to very low bat fatalities discovered at regional projects. Recent studies in the United Kingdom indicate a lower level of bat activity at PV solar farm sites, indicating that the panels may be causing some bats to alter their flight paths to areas without panels.

*Collision.* After completion of construction and throughout the life of the project, the solar facilities and other components may present a collision or electrocution risk to birds. Collisions typically occur when the structures are not visible (e.g., power lines or guy wires at night), or are deceptive (e.g., glazing, and reflective

glare) or confusing (e.g., light refraction or reflection from mist). Impacts due to collision are consistent with the analysis in the DRECP FEIS Section IV.7.1.1.2 (page IV.7-10), which notes that solar structures found in large solar generation facilities mimic water bodies (i.e., "lake effect") and create solar flux that result in collision, and Section IV.7.3.2.1 (page IV.7-158), which notes that the highest anticipated collision risk was in the Cadiz Valley and Chocolate Mountain area where the project is located.

While individual impacts to birds may be expected due to collisions with project facilities and equipment, the risk to avian populations is minimal. A collection of monitoring studies at PV solar facilities in three bird conservation regions (BCRs) in California and Nevada have documented 669 fatalities, with 54.71% being common songbirds (WEST, 2020).

Post-construction monitoring data was collected from regional Sonoran and Mojave Deserts (SMD) projects. The SMD projects annual fatality rates range from 0.08 to 2.99 birds per MW per year, with a mean of 1.31 birds per MW per year. Based on studies of the gen-ties associated with Blythe, McCoy, and Desert Sunlight Solar Projects, it is estimated approximately 60 birds per km per year may collide with the lines (WEST, 2020).

Using these average values, approximately 655 (1.31 x 500 MW) bird fatalities are predicted annually in the solar arrays. An additional 432 bird fatalities (60 x 7.2 km (4.5 miles)) are predicted annually along the gen-tie in an average year (WEST, 2020).

*Electrocution*. Large birds can be electrocuted by transmission lines if the bird's wings simultaneously contact conductors, or a conductor and a grounded structure. Configurations less than 1 kV or greater than 69 kV, such as the gen-tie line, typically do not present an electrocution potential, based on conductor placement and orientation (APLIC, 2006).

MM BIO-8 requires a Bird and Bat Conservation Strategy (BBCS), which is also in compliance with CMA LUPA-BIO-17 that requires a BBCS be developed and implemented for the project. The Easley Project BBCS is included in POD Appendix M (see EA Appendix E, POD). Implementation of MM BIO-10 (Gen-tie Lines) would require design and construction of the gen-tie line to avoid potential for electrocution and minimize potential for roosting on the structures or colliding with them. These measures would effectively minimize impacts to birds near the proposed gen-tie route. Monitoring the project during construction and O&M phases (see MM BIO-8 and POD Appendix M) will confirm whether collisions with solar and electrical infrastructure are consistent with the avian mortality numbers recorded at similar projects.

**Couch's Spadefoot Toad.** Couch's spadefoot toad uses late season monsoonal rain pools for breeding, development and hatching of eggs into tadpoles and then juvenile toads. It requires rain pools that hold water long enough for the eggs and tadpoles to develop, and then disperse into surrounding habitat (approximately 1 week). Couch's spadefoot toad was not observed during surveys, but potential suitable breeding habitat is present within the Project site in areas where water accumulates. Nineteen data points were documented throughout all survey periods as potential breeding habitat where water may accumulate after rainfall or where human activity creates perennial water sources. Several data points are along a channel with wetlands and areas of open water created from drainage from the aquaculture farm. This habitat was checked in the late summer of 2022 following substantial regional rainfall. Within the same period, breeding pools were recorded approximately 20-miles southeast of the Project site. There was no standing water observed within the mapped potentially suitable habitat within the Project. The potential for Couch's spadefoot toad to occur on the Project site is expected to be low; future surveys will occur opportunistically during summer months of May through September when sufficient rainfall in warmer temperatures allow for breeding to determine occupancy (See BRTR (POD Appendix G in EA Appendix E)).

Impacts to Couch's spadefoot toad, if present, may include direct loss of habitat, mortality from crushing or vehicle collision, or increased predation by opportunistic predators. MMs previously discussed would minimize adverse impacts to native vegetation and habitat and offset the permanent habitat loss through off-site habitat compensation. MM BIO-6 (Wildlife Protection) would minimize mortality and injury with

implementation of pre-construction surveys, vehicle speed limits, and measures to prevent entrapment and release entrapped wildlife.

***BLM Sensitive and State Protected Species***

**Desert kit fox and American badger.** Active and inactive desert kit fox burrows were observed on the project site. Suitable habitat for American badgers is located throughout the project site and active burrows with dig marks and recent tracks were observed; however, no live individuals were observed.

Both species could use native habitats wherever prey animals may be present, and soils are suitable for burrows. Potential direct impacts to American badger and desert kit fox include mechanical crushing of individuals or burrows by vehicles and construction equipment, habitat loss, and noise and disturbance to surrounding habitat. Exclusion or security fencing could entrap desert kit foxes or badgers in the construction area. MM BIO-1 through MM BIO-5b, listed in EA Appendix F, would minimize adverse impacts to native vegetation and offset the permanent habitat loss through off-site habitat compensation. MM BIO-6 (Wildlife Protection) and MM BIO-12 (Desert Kit Fox and American Badger Relocation) would prevent or minimize potential injury to desert kit fox and American badger. MM BIO-6 identifies practices and requirements to prevent or minimize wildlife injury and mortality, and MM BIO-12 specifies details for pre-construction surveys, exclusion of animals from dens, passive relocation from the site, and avoidance of natal dens.

**Burro Deer.** Nearby active agricultural areas provide a dependable water source for burro deer. Additionally, desert dry wash woodland habitat may provide seasonal foraging or cover habitat for burro deer. Potential impacts of the project would include loss of habitat and restriction of movement to water sources due to the presence of the security fencing surrounding the solar facilities. Burro deer are expected to avoid project-related disturbance during construction and O&M, and no special measures are necessary to exclude them from work areas. MMs BIO-1 through BIO-5, listed in EA Appendix F, would minimize adverse impacts to native vegetation, including burro deer habitat, and offset the permanent habitat loss through off-site habitat compensation. Potential impacts to burro deer movement are addressed in the Wildlife Movement Section below.

***Impacts of Pesticide and Herbicide Use on Wildlife***

The impacts of pesticide use to wildlife were analyzed in the PEIS (pages 4-118 through 4-124). The proposed project would have an overall beneficial effect on wildlife (including listed and other special-status species) because it would prevent the habitat degradation and loss of native forage that would result if noxious weeds, non-native or invasive plants were introduced and spread in and outside of the project area. However, herbicides may pose risks to terrestrial or aquatic animal species as described in detail in the PEIS (see pages 4-118 through 4-124). Herbicides that persist on site could adversely affect animals that feed on target plants or are exposed to the herbicides (e.g., by digging or rolling in treated soil). The IWMP specifies usage parameters to prevent potential risks, including specific measures to avoid application in the vicinity of native vegetation or special-status wildlife forage plants, and to avoid overspray or spillage in any areas.

According to the PEIS, field studies suggest that appropriate herbicide use is not likely to have significant direct toxicological effects on wildlife. Based on the analysis in the PEIS (pages 4-118 through 4-123) and the Vegetation Treatment BA (page 2-7 through 2-22), which was based upon Ecological Risk Assessments (ERAs) from both BLM and Forest Service, risks to terrestrial wildlife from invasive plant treatments using the proposed herbicides range from no risk to moderate risk from direct spray and ingestion of contaminated vegetation or prey (BLM, 2007a). Chemical use proposed to control noxious weeds, non-native and invasive species on the project site would exclusively be BLM-CA approved herbicides and adjuvants that have been analyzed in the PEIS (BLM, 2007), in These herbicide formulations include: chlorsulfuron, clopyralid, glyphosate, imazapyr, and triclopyr, all of which are described in greater in the associated IWMP. Herbicides that represent the lowest risk for negative effects to sensitive species present on site would be prioritized.

Herbicide application would have an overall beneficial effect for wildlife (including listed and other special-status species) because the control of noxious weeds, invasive and non-native species helps to prevent habitat degradation and loss of native forage that may result if noxious weeds, invasive and non-native plants were introduced, allowed to establish, and spread into and outside of the project area. However, herbicides may pose risks to native animal species. Herbicides that persist on site could adversely affect animals that feed on non-native plants or are exposed to the herbicides (e.g., by digging or rolling in treated soil). The IWMP (POD Appendix N in EA Appendix E) specifies maximum application rates to minimize potential risks, including ways to minimize impacts to native vegetation or special-status wildlife forage plants, and to avoid overspray or spillage in any areas. Additionally, following the most current manufacturer's label, the IWMP specifies proposed usage and formulations of herbicides at the project site and would incorporate all applicable SOPs for applying herbicides and BMPs listed in EA Appendix H. Applicable mitigation measures for the project would also be implemented during invasive plant management, see EA Appendix F.

According to the PEIS (BLM, 2007a), field studies suggest that appropriate herbicide use is not likely to have significant direct toxicological effects on wildlife. Based on the analysis in the PEIS (pages 4-118 through 4-123) and the Vegetation Treatment BA (pages 2-7 through 2-22), which was based upon ERAs from both BLM and the U.S. Forest Service, risks to wildlife (terrestrial) from noxious weed, non-native and invasive plant treatments using herbicides proposed for potential use on-site would be detailed in the IWMP and the PUP.

Herbicide use would not result in adverse impacts, or impacts of greater magnitude, than those described above for special-status wildlife. Overall effects of noxious weed, invasive and non-native plant management on wildlife would be beneficial, improving habitat quality and native cover. With implementation of mitigation measures, including the IWMP and the PUP, impacts to wildlife from use of herbicides would be minimized.

***Wildlife Movement***

Development within the linkage area would reduce the available wildlife movement habitat for many species, including desert tortoise and burro deer. Construction activities could temporarily discourage wildlife from approaching the project site due to noise and disturbance. After construction, the proposed solar facilities would interfere with local-scale wildlife movement by larger species unable to cross the facilities due to project fencing that may be installed. The BLM may require the installation of Wildlife-friendly fencing on portions of the proposed facility should the BLM find it be in the public's interest and protect the resources. Should BLM require Wildlife-friendly fencing, temporary desert tortoise exclusion fencing may be removed after construction and vegetation is substantially reestablished and wildlife-friendly fencing installed in its place.

The DRECP identifies the Pinto Wash Linkage (PWL), described further below, that partially overlaps with the northern portion of the Project site within the DFA. The PWL was identified as an interconnection between the Joshua Tree TCA and Chuckwalla TCA by the DRECP. Analysis discussed further below indicates that the functional portion for connectivity of the PWL is within its northwestern most extent and the development of the Project site within the southeastern most portion of the PWL, which overlaps with the DFA, will not impact the PWL's function as a linkage.

The PWL is described in the DRECP as an important linkage for desert tortoise connectivity. However, its boundaries have varied since it was first described by USFWS in project-specific BOs, including for the Desert Sunlight and Desert Harvest Solar Projects, prior to the development of the DRECP. The PWL, as mapped in the DRECP, appears to be a digital interpretation of the Tortoise Habitat Connectivity boundary introduced in the Desert Sunlight BO but with more precise boundaries based on land ownership. Under the DRECP, the PWL occupies a vast area, occupying over 32,500 acres in total. Portions of the PWL overlap BLM-designated ACEC, while others overlap BLM-designated DFA, and other BLM managed lands that are not designated as ACEC or DFA.

The boundaries of the area serving a linkage function in this region have changed over time and the PWL, as codified in the DRECP, includes approximately 10,0000 acres that lack potential for desert tortoise connectivity due to low quality habitat and existing obstacles to movement (as demonstrated by the GIS attributes that denote habitat quality in the DRECP. The DRECP PWL includes polygons of high and low habitat value ratings as well as non-habitat. In addition, the DRECP PWL includes polygons of high value habitat with habitat category notes of "lost or severely disturbed habitat" in its descriptions. The low and non-habitat areas within the PWL generally overlap with the DFA, while high value habitat overlaps with ACEC designated lands.

The southern portion of the PWL falls within a DFA designated by the DRECP as an area targeted for renewable energy development. Desert Sunlight and Desert Harvest are located within that same southern portion of the PWL characterized by low quality or non-habitat (though both projects pre-date the DRECP).

All BLM lands included in the Project footprint are designated by the DRECP as DFA lands. The north-westernmost portion of the Project site is located within the area where the DRECP-designated DFA overlaps with the southeasternmost portion of the PWL that is categorized as non-habitat or low-quality habitat.

The Project site does not occur within the high-quality habitat portion of the PWL nor within the areas that have been modelled as a functional linkage area. The best modelled habitat for connectivity of the PWL is the northern and western portions, outside of the DFA and well outside of the Project footprint. Analysis of the long-term viability of desert tortoise populations and the function of the linkage from the development of the Project site is further discussed below.

The portion of the Project site that overlaps with the PWL is classified as low quality and non-habitat by the DRECP. These areas correspond well with the predicted occupancy model for desert tortoise (Nussear et al 2009), where the non-habitat areas are classified as 0 or 0-0.1 for predicted occupancy and the low-quality habitat area corresponded with 01.-0.3 in predicted occupancy (See BRTR Figure 9 POD Appendix G in EA Appendix E). Assorted studies have used ≥ 0.5 to denote the threshold for suitable habitat for desert tortoise (USFWS 2011, 2012). Conversely, lands that score < 0.5 have a low to moderate probability of desert tortoise occupancy. The entirety of the Project site is below the 0.5 threshold for suitable habitat and the area that overlaps with the PWL has the lowest score for suitable habitat (majority of the area had a habitat value of 0-0.1, with small areas of 0.2 values, which are far below the threshold for suitable habitat). These areas of low habitat suitability also align with the DFA.

Empirical data from protocol surveys on the Project site did not yield any active desert tortoise data (burrow, tracks, scat, live individuals) within the footprint. Only desert tortoise carcasses were observed, located outside of the PWL where it overlaps with the DFA and the Project site in areas that had low to moderate levels of occupancy from 0.3-0.5). These carcasses were all older classifications (class 4: 4 years, shell bone falling apart, growth rings on scutes peeling, bone fissured or class 5: >4 years, disarticulated and scattered). Empirical data thus indicate low desert tortoise habitat suitability within the Project site overall, consistent with the expectations of habitat models, and even lower quality habitat in the portion of the Project site and DFA that overlap with the PWL. Empirical data from adjacent renewable projects also did not indicate any active desert tortoise sign nearby (Ironwood 2019, 2021).

Current desert tortoise population density within and adjacent to the Project site is extremely low and correlates with low habitat suitability and predicted occupancy. Development of the Project site will have very little impact, if any, on the local desert tortoise population and will not compromise the function of the PWL, given the poor quality of the existing habitat (in the area where the PWL overlaps with the Project site and the DFA) and the fact that the functional portion of the PWL is located far northwest of the Project site.

Stressors of multiple human uses have been identified as reducing habitat suitability (Averill-Murray et al 2012). There are several existing anthropogenic disturbances near and adjacent to the Project site that negatively impact habitat suitability and already inhibit or constrict connectivity between the portion of the PWL that overlaps with the Project site and the DFA, and the functional portion of the PWL to the northwest.

Directly north of the Project site is the existing Desert Sunlight Solar Farm and the Desert Harvest Solar Farm. Directly northwest of and southwest of Easley is the Athos Renewable Energy Project. Adjacent to and within Easley's footprint are active and fallow agricultural lands. Directly south of the Project site is the Lake Tamarisk community and the under-construction Oberon Renewable Energy Project. Kaiser Road borders the westernmost edge of the Project site and Highway 177 borders the eastern edge. An existing transmission line also crosses part of the Project footprint within the PWL. Anthropogenic disturbances, particularly roads and highways also have some potential to contribute to desert tortoise mortalities.

Overall, desert tortoises do not coexist well with development and are absent when more than 10% of land in an area is developed, which includes urban development, cultivated agriculture, energy development, surface mines, pipelines, and transmission lines (Carter et al 2020). The portion of the PWL that overlaps with the DFA already has low connectivity value due to existing conditions, and the development of Project site will not further compromise its function.

CMA LUPA-BIO-13 requires projects along the edges of the biological linkages to maximize the retention of microphyllous woodlands, to maintain the function of the connectivity area (see EA Appendix F for the applicability of DRECP CMAs to the Easley Project).

The revised version of Alternative 2 would no longer be set back 300-feet from I-10 to preserve the Section 368 utility corridor, as described in the draft EA. While eliminating this setback would restrict east-west movement along the northern side of I-10 between the I-10 underpasses, the increased setback from desert dry wash woodland in two higher quality north-south washes within the wildlife linkage corridor would support wildlife movement north and south of the freeway.

The proposed project would also include an Operations phase fencing design option for fenced areas where a gap along the bottom of the fence would allow small wildlife, including possibly desert tortoises to pass through. MMs BIO-5 and BIO-5b would require acquisition and management of off-site vegetation and habitat in perpetuity to offset the long-term loss of natural vegetation and habitat on the project site, including desert dry wash woodland and critical habitat.

Once completed, the gen-tie line, would have minimal effects on terrestrial wildlife movement because no new barrier to movement would be constructed beneath the line. However, the gen-tie towers and conductors would present a collision hazard for birds, including special-status species. MMs BIO-8 and BIO-9, previously discussed, would minimize impacts to wildlife movement across the proposed gen-tie route. Construction of towers and fencing would provide increased perching opportunities for predatory birds including raptors and ravens. MM BIO-7 includes preparing and implementing a Raven Management Plan that would manage raven subsidies and attractants. MM BIO-10 requires the gen-tie structures be designed to discourage use by raptors for perching or nesting.

**Alternative 3**

The Reduced Acreage Alternative would be similar to the Proposed Action but would remove approximately 50 acres of solar panels closest to the community of Lake Tamarisk. The onsite substation and BESS would be moved at least 0.7 mile to the northeast (farther from the community of Lake Tamarisk), on either BLM-administered land (Substation Alternative A) or private land adjacent to SR-177/Rice Road (Substation Alternative B) (EA App. A Figure 2-9, Reduced Acreage Alternative). The 500 kV gen-tie line would exit the substation to the south and would cross SR-177/Rice Road before turning to the southwest to parallel the roadway on BLM land within the Easley site to rejoin the proposed route where it would cross SR-177/Rice Road onto the Oberon Project. At 7.5 miles, the length of the 500 kV gen-tie line under the Reduced Acreage Alternative would be approximately 0.8 miles longer than the proposed 500 kV gen-tie line (6.7 miles). All other project features would be the same as the Proposed Action.

By removing the solar arrays, having 50 acres of additional desert habitat would be a positive impact on surrounding habitat areas. Approximately 9 acres of desert pavement would also be avoided by removing these solar panels. CMAs and mitigation measures would be implemented, and overall impacts would be the same as the proposed Project.

**Alternative 4**

The Community Buffer Alternative would be similar to the Proposed Action but would remove 530 acres of development within 1 mile of the residences of the Lake Tamarisk Desert Resort referred to as the buffer area. Underground medium voltage 34.5 kV lines, however, may need to cross within the buffer area to connect the solar facility development areas to the onsite substation. This alternative includes the construction of two earthen berms to screen the view of the solar facility from the Lake Tamarisk Desert Resort, and would relocate the Project's substation, BESS facility, and O&M building to a location adjacent to Hwy. 177, approximately 1.25 miles northeast of the substation site in the Proposed Project. Because of the relocation of the substation, this alternative would increase the length of the gen-tie by 1.45 miles. By removing the solar development areas within one mile of the Resort, having 530 acres of undisturbed desert habitat would be a positive impact on surrounding habitat areas, allowing an increase in wildlife movement through the area.

In the Community Buffer Alternative, an additional 10-acres of desert dry wash woodland and 6.5-acres of desert pavement would not be disturbed. The area where the solar development would be removed overlaps moderate to high quality desert tortoise habitat areas with predicted desert tortoise occupancies of 0.3-0.7 (Nussear et all., 2009). The absence of solar development would have a positive impact on tortoises, if present, due to the lack of development of these areas. Installation of the earthen berms could adversely affect the drainage patterns, possibly causing the degradation of adjacent desert tortoise habitat (Abella and Berry, 2016) and could also interfere with wildlife movement through the area.

An increase in the overall length of the gen-tie line could increase the likelihood of bird collisions and electrocutions. CMAs and mitigation measures would be implemented, and overall impacts would be the same as the proposed Project.

### 3.4.4 Cumulative Effects

The geographic extent for this cumulative analysis includes the desert portion of Riverside County (Palm Springs to the Colorado River) because it consists of similar habitat over large areas and encompasses regional populations of species that could be directly or indirectly affected by the Proposed Action.

As the number of solar projects and other developments increase in the region, the cumulative effects to wildlife and vegetation resources increase. This analysis considers the current and fore-seeable future projects identified in Appendix M (Tables M.2-1 and M.2-2). Individually, these projects would contribute to reduced habitat availability and result in increased habitat fragmentation for both wide-ranging and localized habitat niche special-status species. Cumulatively, these projects would total more than 64,000 acres of development if constructed and include many miles of transmission lines.

The DRECP is a regional planning effort that includes conservation within BLM land designations as well as implementation of biological resource CMAs to reduce potential cumulative effects to natural communities. Cumulative impacts to biological resources from projects in the DRECP Plan area are analyzed in the DRECP FEIS Section IV.25.3.7 (page IV.25-53) and includes impacts to native vegetation, sensitive wildlife, and their habitat. Table IV.25-5 identifies cumulative impacts to desert tortoise (less than 1% of habitat in DFAs and 88% in conservation). Implementation of the CMAs as part of the overall conservation strategy would reduce the adverse effects from the loss of native vegetation and impacts to sensitive plants and wildlife resulting from renewable energy development activities within DFAs.

The project would not affect the overall function of the desert dry wash woodland in the area for the reasons described in Section 3.5.2 and cumulative impacts to habitat and species would be the same as those described in the DRECP FEIS. Impacts to desert dry wash woodland would be avoided on private lands, as on BLM lands in accordance with the DREPC CMAs. The proposed Project would avoid desert dry wash woodland with the exception of minor incursions, so it would not contribute to cumulative effects. Indirect effects from the Easley Project in adjacent habitats would be minimized with a buffer from desert dry wash woodland habitat on both private and public lands. Additionally, the project would have a beneficial impact

to vegetation through avoiding the introduction and spread of invasive plants with implementation of integrated weed management.

For the project, MMs BIO-1 through BIO-12 as detailed in EA Appendix F, would be implemented to minimize, and compensate for its project-specific impacts as well as its contribution to regional cumulative effects to vegetation and wildlife resources. These mitigation measures, along with conservation within proposed BLM land designations and biological resource CMAs per the DRECP LUPA and FEIS, would reduce the cumulative effect to biological resources.

## 3.5 Issue 4: Visual Resources

### 3.5.1 Visual Resources Issue Statement and Methodology for Analysis

*Would the project result in short-term or long-term diminished landscape character?*

The impact analysis analyzes potential direct, indirect, and cumulative impacts of the proposed Project on visual resources. The analysis also considers the potential for incremental impacts from the Project to combine with impacts of other projects and activities to adversely affect visual resources in the area. Conservation Management Actions (CMAs), identified in the DRECP, and mitigation measures are identified to avoid or reduce potential impacts, and the potential for residual impacts is evaluated. Information presented on visual resources and the potential for project induced glare is taken primarily from the Visual Analysis Report and Glare Assessment, dated May 2024, and located Appendix Q to the POD (EA Appendix E). References used are cited in this report.

### 3.5.2 Visual Resource Management Program

The FLPMA (43 United States Code 1701) and the BLM Land Use Planning Handbook (2005) both emphasize the importance of protecting the quality of scenic resources on public lands. FLPMA sections relevant to the DRECP/LUPA are Section 102(a) that identifies “scenic values” as resources for public land management. Section 201(a) identifies that the Secretary of Interior shall prepare and maintain an inventory of all public lands and their resources and other values including scenic values. Section 505(a) provides that each right-of-way granted on public lands shall contain terms and conditions which will minimize damage to existing scenic and esthetic values, among other resources. (BLM 1976)

FLPMA’s legal mandate to protect the quality of scenic resources on public lands is carried out by BLM and is detailed in BLM’s Visual Resource Management (VRM) system. The VRM system has two key aspects: both inventorying and then managing visual resources (BLM 1984). Through the Visual Resource Inventory (VRI) process, BLM identifies the visual resources of a given area and based upon specific standards, assigns an inventory class to each area. This process involves rating the visual appeal of a tract of land (scenic quality evaluation), measuring public concern for scenic quality (sensitivity level analysis), and determining the extent to which an area is visible from travel routes and other observation points (distance zones). VRI classes are assigned through the inventory process. Class I is assigned to those areas where a management decision has been made previously to maintain a natural landscape (for example, wilderness). VRI Classes II, III, and IV are assigned based on a combination of scenic quality, sensitivity level, and distance zones. Inventory classes are informational in nature and provide the basis for considering visual values in the land use planning process.

The four VRI classes are the foundation upon which BLM considers visual values in its management planning processes. Visual resource management (VRM) classes are assigned through the land use planning process.

BLM’s Visual Resource Management program includes a standardized system to review lands actions for resource management plan conformance. Visual contrast rating worksheets are completed to determine if a project conforms to the VRM Class objective. The VRI process forms the basis for analyzing the effects of the Project on visual resources within the surrounding lands. The Visual Analysis Report and Glare Assessment for the Easley Renewable Energy Project, located in EA Appendix E, POD Appendix Q,

describes the methodology for visual analysis and VRM contrast rating, and provides an analysis of the visual characteristics within and surrounding the Project. Included in this analysis are the existing VRM Class areas, seven Key Observation Points (KOP) for assessing the various factors that are considered in the evaluation of a landscape's existing visual resources, visual contrast rating analyses that identify the existing landscape characteristics and degree of visual contrast presented by the Project from each KOP, and a detailed discussion of each KOP and VRM Class consistency using pre-project photographs and post-project visual simulations for each of the three Project action-alternatives Numbers 2, 3, and 4.

### 3.5.3 Affected Environment

The landscape of the project is part of the Great Basin section of the Basin and Range physiographic province, a vast desert area of the western U.S. extending from eastern Oregon to western Texas. The project's location, within Chuckwalla Valley in eastern Riverside County, is characterized by a transition between the high elevation Mojave Desert and the lower elevation Sonoran Desert. The Chuckwalla Valley is characterized by a broad and relatively flat valley floor with braided arroyos across much of the general project area, sand dunes across the northern portion of the valley, and dry lake beds or playas on the eastern valley, all bordered by rugged mountain ranges including the Eagle Mountains to the west and north, the Coxcomb and Granite mountains to the north, the Palen Mountains to the northeast, and the Chuckwalla Mountains to the south, all within a twelve-mile radius. The rugged ridges, angular forms, and light-tan to lavender and bluish hues of the mountains provide a contrast of visual interest to the flat, light-colored, horizontal landform of the Chuckwalla Valley floor. Views within Chuckwalla Valley tend to be expansive and capture a landscape that appears relatively visually intact, though numerous dispersed energy facilities and other human elements are visible.

The viewshed (the area within which the project could potentially be seen) encompasses much of the Chuckwalla Valley and the project-facing slopes and ridgelines of the surrounding mountains, including areas within Joshua Tree National Park (JTNP). Figure 3.2-1A in POD Appendix Q (in EA Appendix E) illustrates the visibility of the project according to a "line-of-sight" terrain model that does not account for possible vegetation or structural screening.

A notable feature of the flat desert landscape is the potential for large projects to be seen over great distances. However, due to the relatively low profile of the solar panels, the majority of viewers would be at elevations similar to that of the project, and the views would typically be limited to the edges of the solar fields. More precisely, the typical viewing distance zone that most viewers would experience is foreground/ middleground (under 5 miles) due to the relatively close proximity of I-10, SR-177, and other viewpoints. The exception would be for more elevated views (e.g., Alligator Rock and Chuckwalla Mountains, and portions of JTNP including the Eagle and Coxcomb Mountains, all located within 10 miles of the proposed facility). Elevated (or superior) views from these locations would have the potential to see the entirety of the array fields, which would then appear to be more visibly expansive.

There are a number of sensitive land uses and protected areas within the project's viewshed including:

- Desert Lily Preserve ACEC
- Palen Ford ACEC
- Alligator Rock ACEC
- Chuckwalla ACEC
- Palen Dry Lake ACEC
- Palen McCoy Wilderness
- Joshua Tree Wilderness
- Chuckwalla Mountains Wilderness
- Joshua Tree National Park

The communities of Desert Center and Lake Tamarisk are in close proximity to the proposed project. Potentially affected viewers include residential viewers in Lake Tamarisk Desert Resort and dispersed rural residences; as well as recreational visitors to ACECs, wilderness areas, and open public lands; and travelers along the main transportation corridors (I-10 and SR-177).

The presently undeveloped project site is situated north of I-10 and primarily west of SR-177, with the exception of two parcels totaling 143 and 40 acres. The western side of the project directly abuts Kaiser Road, and the community of Lake Tamarisk is adjacent to the southwest corner of the project. Adjacent

solar projects include Oberon, Desert Sunlight, Desert Harvest, and Athos with these projects having concentrations of solar panels broken by interspersed desert, both within and adjacent to the solar projects. Other modifications in the area include I-10 to the south, the small community and highway stop, Desert Center, various electrical transmission and solar gen-tie lines, and the Red Bluff Substation.

The majority of the BLM lands are predominantly intact, while the private lands are characterized by disturbances generally associated with past agriculture. The remaining area, surrounding the project, is lightly populated and consists mainly of desert scrub (largely scattered creosote bushes), scattered microphyll woodland, lakebed, and sand dune landscapes that are relatively intact.

Lands within the project area are located within a Development Focus Area (DFA) per the 2016 DRECP LUPA, which assigns VRM Class IV to DFAs (BLM, 2016). As defined in BLM Manual H-8410-1 Visual Resource Inventory (BLM, 1986a), the VRM Class IV management objective is:

> *"…to provide for management activities, which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements in the predominant natural features of the characteristic landscape."*
>
> *The effects of this proposed project and alternatives on visual resources in this area will, therefore, be compared against the guidelines established for VRM Class IV.*

### 3.5.4 Direct and Indirect Environmental Effects

Under BLM's Visual Contrast Rating (VCR) System, the Proposed Action (Project) and alternatives are analyzed for their effects on visual resources using an assessment of the visual contrast within the landscape created by components of the Project. Impacts to the visual resource values and conformance with VRM Class Objectives are evaluated through a contrast rating process described below. The degree to which the Project and alternatives adversely affect the visual quality of a landscape is directly related to the amount of visual contrast between the action alternatives and the existing landscape character.

VCRs were determined at each KOP using the BLM's VRM System manual (BLM, 1986b) and are identified in POD Appendix Q, Figure 3.2-1B. The VCR forms are provided in Section 3 of the POD. Under the VRM VCR System, the degree to which a project affects the visual quality of a landscape depends on the visual contrast created between the project components and the major features, or predominant qualities, in the existing landscape. Visual contrast evaluates a project's consistency with the visual elements of form, line, color, and texture already established in the viewshed. In a sense, visual contrast indirectly indicates a particular landscape's ability to absorb a project's components and location without resulting in an uncharacteristic appearance.

Other elements are considered in evaluating visual contrast include the degree of natural screening by vegetation and landforms; placement of structures relative to existing vegetation, landforms, and other structures; observer's angle of view relative to the project; distance from the point of observation; viewing duration/spatial relationships; atmospheric conditions; season of use; lighting conditions; and relative size or scale of a project. Once the degree of anticipated contrast is determined (ranging from none to strong), a conclusion on the overall level of change is made (ranging from very low to high) and compared to the applicable VRM Class for a determination of project conformance with the VRM Class Objectives, in this case, VRM Class IV.

The KOPs, identified in Fig. 3.2-1B of POD Appendix Q, are determined to be the most critical viewpoints along commonly traveled routes or other likely observation points in proximity to the project. These KOPs provide an effective cross-section to analyze the effects of the project on visual resources in the area. KOP locations include: (1) sensitive residential communities near the project (Lake Tamarisk Desert Resort); (2)

important recreation facilities (Alligator Rock ACEC); and (3) important travel routes (eastbound and westbound I-10 and northbound SR-177).

While the effects on visual resources are almost always direct, two exceptions include: (a) the project's indirect effect of contributing to the perceived industrialization of the landscape, as dis-cussed in Section 3.6.3 (Cumulative Effects) below and (b) the effects of increased construction vehicle traffic on regional roads (I-10 and SR-177), which is not expected to be noticed by the casual observer. To the extent that a casual observer or local resident perceives any increase in traffic, the duration of the effects would be short-term. The effects addressed in the following paragraphs should be considered direct effects unless otherwise noted.

#### 3.5.4.1 DRECP-Conservation Management Actions for VRM (CMAs)

Projects proposed within the DRECP must comply with the CMAs, identified in the EA, Appendix F, Mitigation Measures and Conservation Management Actions, pertaining to visual resources. These CMAs include LUPA-VRM-1 that requires proposed projects to manage visual resources in accordance with the VRM Classes. Under LUPA-VRM-2, activities within each of the VRM Class polygons must meet the identified VRM objectives as measured through a visual contrast rating process. The Project is within a VRM Class IV that provides for a high level of change.

LUPA-VRM-3 identifies that transmission facilities are to be designed and located to meet the VRM Class objectives for the area in which they are located including in designated corridors, and that all reasonable effort must be made to reduce visual contrast of these facilities in order to meet the VRM Class before pursing RMP amendments. These efforts include using lattice towers (vs. monopole), color treating facilities using an approved color from the BLM Environmental Color Chart CC-001 (dated April 2014) on towers and support facilities and employing other BMPs to reduce contrast. A comprehensive list of BMPs is identified in BLM's "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands", within which numerous of the above Project adopted BMPs are found.

DFA-VPL-VRM-1 encourages project development in a planned fashion within DFAs (e.g., similar to the planned unit development concept used for urban design—i.e., in-fill vs. scattered development, use of common road networks and gen-tie lines, and use of similar support facility designs materials and colors etc.) to avoid industrial sprawl. The Project is located in close proximity to other renewable development and an existing electric substation. The Easley Project will share access roads and utilize existing roads to the extent feasible. In addition, the Easley Project will interconnect to the Oberon Substation and utilize the Oberon gen-tie line to the Red Bluff Substation. Note: Variance Process Lands (VPL) do not apply to this project.

DFA-VPL-VRM-2 identifies that development in DFAs and VPLs are required to incorporate visual design standards and include the best available, most recent BMPs, as determined by BLM (e.g. Solar PEIS, West Wide Energy Corridor PEIS, and BLM's "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands", as well as other programmatic BMP documents). The Project is implementing this CMA as reflected in project design and adopted mitigation measures as outlined in subsequent sections.

DFA-VPL-VRM-3: Required Visual Resource BMPs, identifies that all development within the DFAs and VPLs will abide by the BMPs addressed in the most recent version of the document "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands", including, but not limited to color-treating solar facilities and transmission monopoles Shadow Gray per the BLM Environmental Color Chart CC001 unless a more effective color choice is selected by the local Field Office VRM specialist, lattice towers and conductors having non-specular qualities, and implementing BMPs to minimize impacts to night sky including light shielding. The Project is implementing this CMA as reflected in project design and adopted mitigation measures as outlined in subsequent sections.

DFA-VRM-1 requires that all DFAs be managed as VRM Class IV to allow for industrial scale development and employ best management practices to reduce visual contrast of facilities. The Project is within a DFA and is identified as being managed under VRM Class IV, however, numerous BPAs have been identified to reduce visual contrast and protect visual resources.

DFA-VRM-2 identifies that regional mitigation for visual impacts is required in DFAs. Mitigation is based on the VRI class and the underlying visual values (scenic quality, sensitivity, and distance zone) for the activity area as it stands at the time the ROD is signed for the DRECP LUPA. Compensatory mitigation may take the form of reclamation of other BLM lands to maintain (neutral) or enhance (beneficial) visual values on VRI Class II and III lands. However, no mitigation is required on VRI Class IV areas.

#### 3.5.4.2 Applicant Proposed Mitigation for VRM

To meet these DREC requirements, the Project proponent has identified mitigation measures to adopt (Applicant Proposed Measures) that will reduce, or in some cases, eliminate impacts of the project on visual resources, as found in EA Appendix F, Mitigation Measures and Conservation Management Actions. These include:

**MM AQ-1: Fugitive Dust Control Plan.** Windblown dust can be highly visible and is a particular problem in the arid southwestern states. Dust abatement and wind erosion control measures reduce the visual impact of airborne dust within and in the vicinity of the project site as well as reduce particulate levels in the atmosphere that impede overall visibility. This is especially important in the vicinity of Joshua Tree National Park where the EPA has mandated stringent levels of protection related to air quality.

**MM AES-1: Surface Treatment of Project Structures and Buildings.** The Project proponent has adopted measures involving treating the surfaces of all non-temporary, large Project structures and buildings (O&M building, inverters, electrical enclosures, gen-tie poles and conductors) visible to the public such that: (a) their colors minimize visual intrusion and contrast by blending with (matching) the existing characteristic landscape colors; (b) their colors and finishes do not create excessive glare from surface brightness; and (c) their colors and finishes are consistent with local policies and ordinances. The transmission line conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. A procedure would be implemented to ensure proper treatment maintenance for the life of the Project. In addition, a specific Surface Treatment Plan would be submitted to the BLM and Riverside County for approval that will satisfy these requirements.

**APM AES-1: Security Fencing.** To reduce operational visual impacts of the Project to the Community of Lake Tamarisk, the Project owner will apply a weathering coating (Natina or substantially similar) to the Project security fencing located closest to the Community. Natina turns galvanized steel or metal into a rustic, brown finish. The length of coated fencing will be approximately one mile and depend on the location(s) of most visible security fencing.

**MM AES-2: Project Design.** The Project proponent has utilized design fundamentals in project design including proper siting and location; reduction of project visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. Design strategies to address these fundamentals include proper use and manipulation of vegetation such as retaining vegetation where feasible in lieu of full grading of surface areas, utilizing harmoniously colored and/or self-weathering facilities, and reducing the amount of disturbed area and blending the disturbed areas into the characteristic landscape.

**MM AES 3: Night Lighting Management.** The Project proponent has adopted measures involving designing and installing all permanent exterior lighting and all temporary construction lighting such that: (a) lamps and reflectors are not visible from beyond the Project site, including any off-site security buffer areas; (b) lighting does not cause excessive reflected glare; (c) direct lighting does not illuminate the nighttime sky, except for required FAA aircraft safety lighting; (d) illumination of the Project and its immediate area is minimized; and (e) it complies with local policies and ordinances. The Project proponent shall also consult with the NPS Night Sky Program Manager in the development of the night lighting and comply

with stricter standards for light intensity. In addition, prior to construction, the Project proponent would submit to BLM, Riverside County, and NPS JTNP for review a Night Lighting Management Plan including a comprehensive list of appropriate mitigation including lighting that is of minimum necessary brightness consistent with operational safety and security, lighting that incorporates appropriate fixture hoods/ shielding, emphasis of LPS or amber LED lighting, and use of surface treatment specifications that minimize glare and skyglow.

**Alternative 1 No Action Alternative**

Under the No Action Alternative, project construction and associated infrastructure would not occur. Because no project would be built, and no ground disturbance would occur, the No Action Alternative would have no direct or indirect impacts on Visual Resources. The lands within the DFA would remain open to future solar project development or linear facilities.

**Alternative 2 Proposed Action**

**Construction of the Proposed Action.** Construction would include short-term visual effects of equipment and vehicle use, material storage and assembly, and other construction related activities at and adjacent to the proposed solar development site including access roads and along the gen-tie ROW. These effects would result from site clearing and grading, fence construction, assembly and installation of solar arrays and collection lines, placement of transmission structures as well as conductor stringing and pulling, and post-construction reclamation activities. Visual contrasts from the current situation would be associated with construction equipment and vehicles, human activities, and surface disturbance resulting in creation of disturbed areas with soils of uniform and lighter tans and smooth textures, in contrast to adjacent areas with darker tan soils of smooth to coarse textures, and loss of the existing patchy clumps of irregular vegetation with tans to golden yellow grasses and green to reddish hues for shrubs.

As construction progresses, structures would become apparent, and the linear form and vertical lines associated with solar arrays and gen-tie poles would cause an increasingly moderate contrast with the horizontal to angular and irregular forms and lines of the existing landforms and the patchy and irregular forms and lines of the valley vegetation. The Project's dark array panels would result in strong contrast with the lighter earth tones of the valley's soils and rock. At various viewing distances, the Project's smooth, manufactured surfaces would cause weak texture contrast with the matte to coarse textures attributable to valley soils, rock, and vegetation. The following KOPs are representative of the overall views of this proposed project as related to changes in visual resources.

Construction activities within the solar facility site would be visible from KOP 1- Eastbound on I-10, as this location is characterized by an open landscape enabling extended views of the project area (POD Appendix Q, Fig. 3.2-2B). Construction of the gen-tie line would also be perceptible in the area of SR-177. KOP 2 -Westbound 1-10 is characterized by a much-reduced view of construction activities within the solar arrays, however, construction of the gen-tie line would be very prominent in the immediate foreground (App. Q, Fig. 3.2-3B). Use of cranes and conductor installation equipment associated with gen-tie construction would create a prominent visual contrast and change in this area.

The view from Alligator Rock, directly south of Desert Center and south of I-10 (KOP 3), provides a prominent view of Chuckwalla Valley including the entirety of the project site, ranging from 1.6 to 5.6 miles distant. Construction activities associated with the BESS, substation, gen-tie line, and solar arrays would be visible from this location (POD Appendix Q, Fig. 3.2-4B).

The view from Lake Tamarisk Desert Resort (KOP 4) is characterized by screening of much of the construction activities by intervening vegetation with portions of the solar site being visible to the northeast and east, and with viewing distances ranging from 0.3 to 1.5 miles. This would include activities associated with construction of the BESS, and portions of the gen-tie line in the area leaving the site (POD Appendix Q, Fig. 3.2-5B). However, views of vehicles and equipment above the surrounding vegetation would be visible.

In addition to the KOP 4 figures from December 2022 (Figures 3.2-5A, 5B, and 5C), a second series of three images (Figures 3.2-5D, 5E, and 5F) was captured in October 2023 with an 8-foot camera elevation (above the ground). This slightly elevated view was obtained and evaluated because it was thought to be more representative of the "porch-height" views that some of the private residences along the eastern resort perimeter experience. This simulation illustrates a very slight increase in visibility of some project features due to the ability to "see over" some of the intervening screening vegetation with the elevated viewing perspective. As the Existing View image presented in Figure 3.2-5D, at 8-foot height, captures essentially the same landscape features that are shown in the same frame of view presented in the original existing view presented in Figure 3.2-5A, at a 5.5-foot camera elevation, there would be no difference between views of construction activities at ground or "porch-height" levels.

The view from KOP 5 – Northbound SR-177 is characterized by much of the project activity being screened by intervening vegetation, including construction activities associated with the substation, solar arrays, and BESS, however, activities associated with construction of the gen-tie line would be very prominent as it both spans and traverses parallel to SR-177 (POD Appendix Q, Fig. 3.2-6B).

The view from KOP 6 – Southbound on SR177 and adjacent to the facility, would allow for construction activities to be very prominent in the immediate foreground, however, some intervening roadside vegetation would partially obscure those activities.

KOP 7, Figure 3.2-8B, located at the northern end of Shasta Drive in Lake Tamarisk Desert Resort, presents an elevated 8-foot camera height (porch height) of the Project. Portions of the solar arrays along the valley floor would be partially visible from this location, at viewing distances ranging from approximately 0.5 to 0.85 miles. While this vegetation would screen portions of the project construction activities, including surface preparation and array installation, construction equipment and vehicles, human activities, and dust would be visible throughout. As the solar arrays are constructed, their noticeable linear form and horizontal line would result in weak to moderate (form) to moderate (line) contrast with the horizontal to angular and irregular forms and lines of the existing landforms (valley floor and background mountains) and the patchy and irregular forms and lines of the valley vegetation. The dark array panels, where visible, would result in moderate contrast with the lighter earth tones of the valley's soils and rock and the Project's smooth, manufactured surfaces would cause weak texture contrast with the matte to coarse textures attributable to valley soils, rock, and vegetation.

Over the long term, areas of ground surface disturbance and vegetation removal (characterized by high color, line, and texture contrasts) could remain visible from various vantage points and for extended periods after construction. Desert revegetation is generally of limited success. Over the site as a whole, areas left vacant to protect microphyll woodlands would break-up views of disturbed areas as they rehabilitate. In addition, since most Foreground/Middleground views of these areas would be at similar elevations (at grade), much of the contrast associated with unnatural vegetative patterns and/or lines would be screened from view by intervening vegetation and the new facilities.

Although this longer-term visual contrast could appear prominent from some viewing locations, the resulting moderate to high levels of visual change would still be consistent with the applicable BLM VRM Class IV management objective, and thus the project would comply with CMAs LUPA-VRM-1 and LUPA-VRM-2. This Class IV objective anticipates the potential for high levels of change to the existing landscape character to facilitate management objectives within DFAs. However, the Project has adopted numerous CMAs, mitigation measures, and BMPs, identified in EA, Sections 3.5.3.1 and 2, that will minimize and, in some cases, eliminate effects to visual resources.

The indirect visual effect associated with increased construction vehicle traffic on regional roads (I-10 and SR-177) is not expected to be noticed by the casual observer. To the extent that any increase in traffic is perceived, the effects would be short-term. Implementation of mitigation measures, including those identified in BLM's Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands (BLM, 2013), would reduce any short-term effects experienced by sensitive viewers. Furthermore, the visual impact of construction is consistent with the DRECP FEIS

analysis, in Section IV.20.3.2.1 (page IV.20-27) which noted that during construction, activities and equipment visible from residences, public roads, and public preserves would result in short-term diminished scenic quality for viewers.

**Operation & Maintenance of the Proposed Action**. Operation and maintenance would involve a photovoltaic solar facility occupying 3,735-acres, along with ancillary facilities including a substation, BESS, electrical collection lines, access roads, and a 6.7-mile gen-tie line. The views from KOPs 1-7, during operation and maintenance, would contrast with the construction phase of the project in that construction equipment, vehicles, and extensive human activity would have substantially diminished, having been replaced by the linear form and vertical lines associated with operational solar arrays and gen-tie poles as well as a much-reduced level of operation and maintenance activities.

The visual prominence of these facilities would depend on the distance of the viewers, the extent of visual screening by intervening vegetation, and the viewpoint position (at-grade or elevated). At-grade and edge-on views of the array fields (most typical and including KOPs 1, 2, and 4 generally limit the view to the array field edge facing the viewer and present as a narrow, horizontal band along the valley floor. The prominent linear form and horizontal to vertical lines associated with the solar arrays and gen-tie poles would generally cause a moderate contrast with the irregular forms and lines of the existing landforms and the patchy and irregular forms and lines of the valley vegetation. The Project's dark array panels and brown gen-tie poles would result in strong contrast with the lighter earth tones of the valley's soils and rock and the tans and golden yellow grasses, muted greens with reddish hues of the local shrubs. In addition, the smooth to matte textures of the project structures would generally contrast with granular to coarse valley floor soils and matte textured vegetation. In these cases, the form, line, and color contrasts trend toward moderate or moderate to strong with levels of visual change from moderate to high depending on viewing circumstances. The overall prominence of these structures can be obscured by vegetation and distance where applicable.

As shown in KOP 1, the Project would result in various degrees of visual contrast within a viewing distance ranging between 2.5 to 5.6 miles. Specifically, the Project's prominent linear form and horizontal to vertical lines associated with the solar arrays and gen-tie poles would cause moderate contrast with the horizontal to angular and irregular forms and lines of the existing landforms and the patchy and irregular forms and lines of the valley vegetation. The Project's smooth, manufactured surfaces would cause weak contrast with adjacent solar facilities but moderate contrast with the matte to coarse textures attributable to valley soils, rock, and vegetation. The Project's dark array panels would result in strong contrast with the lighter earth tones of the valley's soils and rock but would minimally contrast with the existing solar facilities. The gen-tie line would be perceptible as it parallels SR 177 to the south. The BESS and substation, however, would be substantially obscured from view by vegetation. The resulting overall visual change is determined to be moderate to high and would degrade the existing visual character and quality of the landscape as viewed from KOP 1. The overall level of change from KOP 1 would be moderate to high.

As shown in KOP 2, the Project's prominent linear form and horizontal to vertical lines associated with the solar arrays, BESS, and gen-tie poles would cause moderate contrast with the horizontal to angular and irregular forms and lines of the existing landforms (valley floor and background mountains) and the patchy and irregular forms and lines of the valley vegetation. The Project's solar arrays, prominently visible as continuous, linear, horizontal, medium- to dark gray to bluish-black patches on the valley floor, and partially screened from I-10 views by intervening vegetation, would cause moderate contrast with the lighter earth tones of the valley's soils and rock but minimal contrast with other existing solar facilities in the vicinity. The gen-tie line paralleling SR 177, and then I-10, would be a visually prominent feature in the foreground views from I-10 with the dark-brown gen-tie poles causing moderate contrast with the lighter earth tones of the valley's soils and rock, background landforms. The Project's smooth, manufactured surfaces would cause weak contrast with adjacent solar facilities but moderate contrast with the matte to coarse textures attributable to valley soils, rock, and vegetation. The BESS and substation, however, would be substantially obscured from view by intervening vegetation. The resulting overall visual change caused by the Project

would be moderate and would degrade the existing visual character and quality of the landscape as viewed from KOP 2. The overall level of change from KOP 2 would be moderate.

KOP 3 is the only KOP that provides an elevated perspective of the project, from Alligator Rock, which enables the viewer to see "into" the solar fields from approximately three to 5.6 miles distant. The solar arrays would be visually co-dominant with other adjacent solar projects, creating dark-to light-colored areal masses (depending on panel orientation and time of day) extending across the floor of Chuckwalla Valley and located east and west of SR-177 and north of I-10. Inset within this darker mass would be the prominently white, linear area of the BESS, located adjacent to the cluster of gray and vertical structural elements comprising the substation (barely visible in this view).

The dark, rust-colored vertical poles of the gen-tie line would also be noticeable as it parallels the east side of SR-177, before turning east to parallel other existing gen-tie lines. The Project's prominent linear form and horizontal to vertical lines of the solar arrays, BESS, and gen-tie line would cause weak to moderate contrast with the horizontal to angular and irregular forms and lines of the existing landforms (valley floor and background mountains) and the patchy and irregular forms and lines of the valley vegetation. The Project's form and line contrast, however, would be consistent with the adjacent solar facilities and gen-tie lines already established in the landscape, resulting in overall weak to moderate form and line contrast. Overall, the Project's smooth, manufactured surfaces would cause no contrast with adjacent solar facilities, but weak contrast with the matte to coarse textures attributable to valley soils, rock, and vegetation, resulting in an overall weak level of texture contrast. The medium to very dark gray and blue/black hues of the arrays, and brown gen-tie poles, would present a moderate to strong contrast compared to adjacent soils, rocks, and vegetation. The overall level of change from KOP 3 would be moderate.

The view (KOP 4) of the project from the Lake Tamarisk Resort includes a 30-acre block of solar arrays located 0.20 miles to the northeast, including portions of the white-colored BESS being partially visible approximately 0.7 miles to the east. Most of the substation, in the same approximate location as the BESS, would be screened from view. In addition, the proposed brown gen-tie line poles would be visible as it extends east to connect to the Red Bluff Substation (at viewing distances ranging from 0.8-0.9 miles). The prominent linear form and horizontal to vertical lines associated with the Project's solar arrays, BESS, and gen-tie line, would result in moderate to strong contrast with the horizontal to angular and irregular forms and lines of the existing landforms (valley floor and background mountains) and the patchy and irregular forms and lines of the valley vegetation. The overall level of change from KOP 4 would be moderate.

As discussed in the previous section involving project construction impacts, the addition a second series of three images (Figures 3.2-5D, 5E, and 5F) to the KOP 4 figures, with an 8-foot camera above-ground elevation, captures essentially the same landscape features that are shown in the same frame of view presented as the original existing view presented in Figure 3.2-5A at a 5.5-foot camera elevation. This 8-foot view represents a "porch-height" similar to that seen from the private residences along the eastern resort perimeter. The overall level of change from KOP 4 would be moderate to high.

KOP 5 presents a view of the Proposed Project from the northbound SR-177, approximately 1.5 miles northeast of Desert Center, and illustrates a majority of the Project viewing distances ranging from approximately 0.9 mile to approximately three miles. Intervening vegetation screens portions of the Project. The arrays would present as a visually noticeable, dark- to light-colored horizontal band extending across the valley floor (depending on panel orientation and time of day). The Project substation (a termination point for the gen-tie line) would be partially visible to the west of SR-177 at a viewing distance of approximately 0.7 mile. A portion of the BESS, which would be white in color, would be partially visible behind and beyond the substation at a viewing distance ranging from approximately 0.7 to 0.9 mile.

The proposed gen-tie line would present as dark, rust-colored, vertical structures at viewing distances (from this location) ranging from approximately 140 feet to approximately 0.7 mile (where it connects to the proposed substation). The gen-tie line would be the most visually prominent Project feature from KOP 5 as it extends south from the substation before turning southwest to parallel the east side of SR-177.

The Project would result in varying degrees of visual contrast in the context of an existing landscape that includes not only the natural landform, vegetative patterns, and earth-tone colors and textures of a desert valley, but also the industrial characteristics of several solar projects in the immediate vicinity of the Project site. Specifically, the Project's prominent linear form and horizontal to vertical lines associated with the solar arrays, BESS, substation, and gen-tie line would cause moderate contrast with the horizontal to angular and irregular forms and lines of the existing landforms (valley floor and background mountains) and the patchy and irregular forms and lines of the valley vegetation. However, the Project's form and line contrast would be consistent with the nearby solar facilities and utility lines already established in the landscape, including the wood pole utility line that parallels the west side of SR-177.

The Project's darker array panels would cause moderate contrast with the lighter earth tones of the valley's soils and rock and even vegetation but minimal contrast with the existing solar facilities and repaved roadway. The white color of the BESS would cause moderate contrast with the darker vegetation. The dark brown color of the gen-tie poles would cause moderate to strong contrast with the lighter background sky and earth-tone colors of soils and background landforms but would be consistent in color with the adjacent and nearby existing utility poles. The resulting overall color contrast would be moderate to strong. At this viewing distance, the Project's smooth, manufactured surfaces would cause weak contrast with the matte to coarse textures attributable to valley soils, rock, and vegetation and weak contrast with adjacent solar facilities. The overall level of change from KOP 5 would be moderate.

KOP 6 is representative of the immediate foreground views of the Project area, located immediately adjacent to both sides of SR-177, with the Project presenting a visually significant energy infrastructure feature introduced into the desert valley landscape. The prominent linear form, horizontal lines, and darker color of the solar arrays would all exhibit strong visual contrast compared to the angular and irregular forms and lines of the existing landforms (valley floor and background mountains), the patchy and irregular forms and lines of the valley vegetation, and lighter earth tones of the valley's soils, rock, and vegetation. The dark array panels, however, would cause minimal contrast with the existing repaved roadway. The gen-tie line would be barely discernible, and the BESS and substation substantially screened from view. The Project's overall visual contrast, as experienced at KOP 5 and similar locations along SR-177, would be strong (high) and the resulting visual effect would be adverse. The overall level of change from KOP 6 would be high.

KOP 7, Figure 3.2-8B, located at the northern end of Shasta Drive in Lake Tamarisk Desert Resort presents an elevated 8-foot camera height (porch height) of the Project. While much of the Project shown in Figure 3.2-8B would be screened from view by intervening vegetation, portions of the solar arrays along the valley floor would be partially visible at viewing distances ranging from approximately 0.5 to 0.85 miles. Where visible, the arrays would present as a visually noticeable, medium gray to dark-colored horizontal band (depending on panel orientation and time of day) extending across the valley floor. The open landscape would enable extended view durations of the Project from the resort.

This noticeable linear form and horizontal line associated with the Project's solar arrays would result in weak to moderate (form) to moderate (line) contrast with the horizontal to angular and irregular forms and lines of the existing landforms (valley floor and background mountains) and the patchy and irregular forms and lines of the valley vegetation. The Project's dark array panels, where visible, would also result in moderate contrast with the lighter earth tones of the valley's soils and rock. At this viewing distance, the Project's smooth, manufactured surfaces would cause weak texture contrast with the matte to coarse textures attributable to valley soils, rock, and vegetation. Therefore, the Project's visual contrast would be moderate.

The findings for these KOPs are consistent with the analysis presented in the DRECP FEIS (page IV.20-28), which notes that the structure, size, and industrial character of utility-scale renewable energy and transmission facilities during their operation and maintenance, as well as any associated glare, reflectivity, and lighting, would visually contrast with surrounding undeveloped land and result in long-term diminished scenic quality. In all cases, the resulting moderate to high levels of visual change would be consistent with the applicable VRM Class IV management objective.

However, implementing CMAs, mitigation measures, and BMPs from BLM's Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands (BLM, 2013), as identified in Sections 3.6.3.1 & 2, will reduce long-term effects on visual resources. These include implementation of a Fugitive Dust Control Plan that will reduce the effects of wind-blown particulates causing plumes and haze; utilizing design fundamentals in project design to minimize visual contrast and disturbance including effective vegetation management; treating the surfaces of all non-temporary, large Project structures and buildings (O&M building, inverters, electrical enclosures, gen-tie poles and conductors) visible to the public in order to minimize visual intrusion and potential glare; applying brown-colored weathering coating to the security fencing in areas visible from Lake Tamarisk; and managing night lighting to minimize visual effects including coordinating development of a Night Lighting Management Plan with the BLM, Riverside County, and NPS JTNP.

**Daytime Glare.** The full Glare Assessment report is presented in EA Appendix E, POD Appendix Q, Visual Analysis Report and Glare Assessment, dated May 2024. For this project, glare was modeled using ForgeSolar (2023) glare analysis tools. While the exact model of the PV panels has not been finalized, the parameters of the First Solar Series 7 technology were used as a best-guess technology to run the model to predict any potential impacts to pilots on approach to Desert Center or operators of motor vehicles in the Project area in eastern Riverside County. To determine whether military pilots in the area could experience adverse effects, the glare analysis (2024) also includes segments of two low-level military training routes (MTR), identified as ID-217 and ID-296, that intersect the airspace above the Project.

The model assumed the use of single-axis rotation tracking solar PV panels with a portrait module orientation made of smooth glass without anti-reflective coating, and it used default direct normal irradiance (DNI), which varies and peaks at 1,000 Watts per square-meter (W/m2). In addition, the model considered variations in panel reflectivity with respect to the position of the sun. The assumptions used for the solar panel configuration for all PV panel arrays analyzed is found in Section 5. Glare Assessment, of the Visual Analysis Report and Glare Assessment (p. 52).

There are two types of glare that could be associated with solar panels. Green glare is defined as glare with a low potential to cause an after-image, or flash blindness, when observed prior to a typical blink response time. Yellow glare is defined as glare with a potential to cause an after-image when observed prior to a typical blink response time. Overall, there is a possibility of green glare that could result from the Project PV arrays. However, there is no yellow glare that would result from the solar panels.

Modeled observation points included two route receptors along State Route (SR) 177/Rice Road and R2/Kaiser Road, and one flight path receptor at the Desert Center Runway Approach. Modeled receptors also include two low-level military training routes that intersect the airspace above the Project. Receptors are modeled for flight along MTR ID-217 at a low altitude limit of 200 feet above ground level, and along MTR ID-296 at 300 feet above ground level. Additionally, model runs were conducted for U.S. FAA 2013 and the 2021 Policy Adherence. There are no Air Traffic Control Towers (ATCTs) within two miles of the Project, therefore there were no ATCT receptors assessed. According to the model results, the flight path receptors on the Desert Center Runway Approach would not be impacted by glare from the solar panels; however, some portions of the ground-level routes and MTR receptors have a low potential of being impacted by glare.

Green glare is predicted for ground-level travelers along SR 177/Rice Road from the Project PV arrays adjacent to the road for 313,668 minutes (5,227 hours) of the year. Any potential glare impacts for this route receptor would occur year-round approximately between 5:30 am and 12:30 pm. Additionally, mid-March through the end of September, there is a potential for glare between the hours of 2:00 pm and 7:00 pm. Similarly, green glare is predicted for ground-level travelers along R2/Kaiser Road from the Project PV arrays east of Kaiser Road for 45,249 minutes (754 hours) of the year. Any potential glare impacts for this route receptor would occur from January to mid-May and from mid- July to December, with an approximate maximum duration of 12:00 pm to 5:00 pm. From May to August, potential glare impacts would occur from 6:00 pm to 7:00 pm.

For pilots, there would be no glare of any kind for ATCTs, and that there would be no glare for the Desert Center Runway Approach flight path receptors within two miles. Military pilots at the low altitude limits of MTR in the area could receive green glare at a total annual rate of up to 322,336 minutes (5,372 hours), depending on location. The total annual green glare reported by the model for each receptor may include duplicate times of glare from multiple reflective surfaces.

Therefore, green glare, having a low potential for temporary after-image, is predicted at various levels along area roadways, MTR ID-217 at 200 feet above ground level, and MTR ID-296 at 300 feet above ground level, as a result of the Project. There is no yellow glare predicted.

**Visible Night Lighting.** The DRECP FEIS (Section IV.20.2.1.3) acknowledges that the need for security and safety lighting could contribute to light pollution in areas where night lighting is otherwise absent or minimal. Light impacts include skyglow, off-site light trespass, and glare, which would be addressed through implementation of CMAs LUPA-BIO-13 (General Siting and Design) and DFA-VPL-VRM-1 (Required Visual Resource BMPs). In compliance with the CMAs, lighting at the facilities would be of the minimum necessary and restricted to areas required for safety, security, and operation. Given the relatively sparse development in the surrounding area and the general lack of stationary nighttime lighting (there is considerable transient [vehicles] lighting along the adjacent I-10), the introduction of nighttime lighting would constitute a potentially significant impact. Thus, motion sensitive, directional security lights would be installed to provide adequate but controlled illumination around the substation areas, at each inverter cluster, at gates, and along perimeter fencing. All lighting would be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties. The motion sensor would be triggered by movement at a human's height, as not to be triggered by smaller wildlife.

Lighting, including in the perimeter fencing areas, would be supplemented by use of infrared security cameras, motion detectors, and/or other similar technology to allow for monitoring of the site through review of live footage 24 hours a day, 7 days a week. These cameras or other equipment would be placed along the perimeter of the facility, at the inverters, laydown areas and/or pre-fabrication areas. Security cameras located at the inverters would be posted on poles approximately 20 feet high.

The level and intensity of lighting during operations would be the minimum needed and would comply with guidelines, such as BLM Technical Note 457 (Night Sky and Dark Environments: Best Management Practices for Artificial Light at Night on BLM-Managed Lands) on BLM-administered land to the maximum extent feasible. This includes using the minimum number of luminaires and lights with the lowest lumen output consistent with safe and secure operation. As part of a Night Lighting Management Plan, the number and location of lights, lumen output, and backlight, up-light, and glare (BUG) ratings for each would be assessed in order to minimize or eliminate diffuse light outside of the intended lighted areas. Luminaires would be inspected periodically for proper aiming, luminaire damage, lumen depreciation (loss of the original light output that occurs over time), and lens and reflector degradation, and clean dirt, dust, or dead insects that obscure light or the photocell sensor.

Additionally, the Night Lighting Management Plan would be implemented to mitigate any potential night lighting impacts for all alternatives and includes methods to reduce lighting beyond the project sites and consultation with the NPS Night Sky Program Manager overseeing JTNP. Effective implementation of a Night Lighting Management Plan would substantially minimize the potential for visible night lighting impacts.

**Alternative 3: Reduced Acreage Alternative**

The Reduced Acreage Alternative would be located within the proposed Project application area and has been developed in response to concerns expressed by the Lake Tamarisk Desert Resort community during the CEQA scoping process. The Reduced Acreage Alternative would be similar to the Proposed Action but would remove approximately 50 acres of solar panels in two locations closest to the Lake Tamarisk Desert Resort. A 30-acre collection of solar arrays would be removed located northeast of the Lake Tamarisk Desert Resort, and an additional 20-acre collection of arrays would be removed directly north of Lake

Tamarisk. With this reduction, solar arrays would be approximately 2,350 feet (0.45 miles) from the northeast corner of the Lake Tamarisk Desert Resort community compared to 750 feet (0.14 miles) under the Proposed Action. In addition, removal of the 20 acres of solar arrays would result in solar arrays being approximately 3,696 feet (0.7 miles) from the north end of Lake Tamarisk compared to 2,640 feet (0.5 miles) under the Proposed Action. In response to visual concerns, the substation and BESS would also be moved 0.6 miles to the northeast (farther from the community of Lake Tamarisk), on either BLM-administered land (Substation Alternative A) or private land adjacent to SR-177/Rice Road (Substation Alternative B) (see Figure 2-9, Reduced Acreage Alternative). The alternative substation would be over 1.2 miles from the residences within Lake Tamarisk as opposed to approximately 0.6 mile under the proposed Project. An additional seven gen-tie poles, located adjacent to Hwy 177, would be added due to the placement of the substation and BESS further northeast of the Alternative 2 location.

Given the minimal number of solar arrays to be removed under this alternative and the greater viewing distances and screening by vegetation, there would not be any noticeable changes in the visual effects from KOP 1, 2, and 3.

As shown in KOP 4 at an 8-foot camera height (Fig. 3.2-5C), the 30-acres of solar arrays, representing a thin but noticeable linear form and horizontal line, would be removed and no-longer visible. The BESS, which previously appeared as a noticeable white, linear feature along the valley floor to the east of the resort and was substantially screened by intervening vegetation, would no longer be in view from KOP 4 due to screening by intervening array panels and vegetation. The substation, moved to the northeast, would be partially screened from view by intervening array panels and vegetation, essentially faintly visible as a cluster of vertical, gray structures at the end of the gen-tie line. The gen-tie line would now extend farther north on SR 177, with approximately seven additional structures being visible as contrasting vertical and brown-colored gen-tie line poles that result in a moderate to strong contrast with the lighter earth tones of the valley's soils and rock and the tans, the golden yellow grasses, muted greens with reddish hues of the local shrubs, and the generally horizontal and irregular landform and vegetation. The overall level of change from KOP 4 would be moderate.

As depicted in Figure 3.2-5C (Dec. 2022), this alternative represents a positive change in the visual impacts of the proposed project as seen from the Lake Tamarisk Resort (Figure 3.2-5B). These positive effects would be visible during both project construction and operation/maintenance. As discussed previously, the addition of Figure 3.2-5F (October 2023) to the KOP 4 figures, with an 8-foot camera above-ground elevation, captures essentially the same visual effects that are shown in the same frame of view presented in Figure 3.2-5C (Dec. 2022).

As shown in KOP 5, this alternative would still result in a moderate to strong level of visual contrast (form, line, and color). The relocation of the substation and BESS to the parcel directly adjacent to Hwy 177, and the addition of the seven gen-tie poles, would contribute to this moderate to strong contrast. The Project's dark grey to black, linear, and smooth array panels would also contrast with the lighter earth tones of the valley's soils and rock, and the matte to coarse textures attributable to valley soils, rock, and vegetation. Overall, there would be no change in the moderate level of change at this KOP between the Alternatives 2 and 3.

As depicted in KOP 6, the limited number of arrays to be removed would not be visible from KOP 6, therefore there would still be strong levels of visual contrast and an overall high level of visual change as viewed from this KOP. While the substation is barely discernable beyond the solar arrays at 1.8 miles distant, the extension of the gen-tie lines along Hwy 177, involving seven additional poles, would be visible. Overall, the level of change would be high for both alternatives 2 and 3.

As depicted in KOP 7 (Figure 3.2-8C), several groups of arrays north of Lake Tamarisk would be removed resulting in a narrower visible line of more distant solar arrays when compared to Proposed Project. These less noticeable arrays would be partially screened from view by intervening vegetation as shown in the simulation. The resulting visual contrast would be weak to moderate, and the overall level of change would be low to moderate. Overall, removal of these 20 acres of solar arrays would represent a low to moderate

positive change in views to the north of KOP 7. The overall level of change from KOP 7 would be low to moderate.

While the overall level of visual change associated with this alternative would be consistent with the applicable BLM VRM Class IV management objective, reducing the contrast between the project and the surrounding landform and vegetation would have a beneficial effect in the vicinity of the Lake Tamarisk Desert Resort and community.

In addition, removing the 50 acres of solar panels closest to the community of Lake Tamarisk, as well as moving the substation and BESS approximately 0.7 mile to the northeast, would have similar benefits in reducing the effects of any residual visible night lighting in this vicinity after implementing the project Night Lighting Management Plan. A slight and similar reduction in glare would also occur in the vicinity of the Lake Tamarisk Resort by the removal of these solar arrays, however, the project overall is determined to not have an adverse effect on travelers on I-10 and SR-177, the residents of Desert Center and Lake Tamarisk, and users of nearby designated wilderness and ACECs.

**Alternative 4: Community Buffer Alternative**

The Community Buffer Alternative would be located within the proposed Project application area; however, all solar panels would be removed within 1.5 miles to the east, 2 miles to the northeast, and 1 mile north of the Lake Tamarisk Desert Resort (see Figure 2-10). This alternative includes the construction of two earthen berms to screen the view of the solar facility from the Lake Tamarisk Desert Resort, and would relocate the Project's substation, BESS facility, and O&M building to a 17-acre location adjacent to Hwy. 177, approximately 1.25 miles northeast of the substation site in the Proposed Project. The gen-tie line to approximately 8.15 miles over the 6.7-mile length of the Proposed Project. The gen-tie line would be increased to 8.15 miles in length, routed through the project site and around a private land parcel for 0.45 miles, then crossing Hwy 177 and proceeding on the eastern side of the highway in a southerly direction for 2.3 miles, before proceeding east within the Oberon Solar Project to the Oberon Switchyard.

The two berms are located north and east of Lake Tamarisk and are designed to screen the view of several solar panel locations from the residents of Lake Tamarisk. The closest residences within Lake Tamarisk Desert Resort are 1.0 miles from the northern berm and 1.35 miles from the eastern berm. The earthen berms would be 10-ft high, 20-ft across and 1,060-ft and 2,290 ft long for the northern and easterly berms respectively.

As depicted in KOP 1, the removal of arrays within one mile of Lake Tamarisk Desert Resort would not appear substantially different from the Project when viewed from KOP 1 due to viewing distance and vegetative screening. Similarly, the substation and BESS relocation, gen-tie line extension, and berm located one mile north of the Resort would not be present as noticeable changes when viewed from KOP 1. The level of change of this alternative would be moderate, in contrast to the moderate to high level determined to exist under the Alternatives 2 and 3 where a stronger line and color contrast is evident.

Similar to KOP 1, the removal of arrays within one mile of Lake Tamarisk Desert Resort would not appear substantially different from the Project when viewed from KOP 2 due to viewing distance and vegetative screening. The substation and BESS relocation, gen-tie line extension, and berm located one mile north of the Resort would also not present a noticeable change when viewed from KOP 2. The level of change for this project would be moderate for all three action alternatives given the lack of substantial change between the views from KOP 2 between alternatives.

Given the increased elevation of KOP 3 (Alligator Rock), the remaining project-wide solar arrays would still be readily visible from this location, resulting in a less than noticeable reduction in the visual contrast from the removal of the solar arrays within the one-mile buffer. The two berms would also not be noticeable features as they would be barely visible against the light, horizontal lines along the valley floor. From this distance, the relocation of the substation and BESS and extension of the gen-tie line would also not present noticeable changes when viewed from KOP 3. The resulting visual contrast would, therefore, still be weak to moderate, and the overall level of change would be moderate.

As viewed from KOP 4, the primary visual difference between this alternative and the Project, illustrated in Figure 3.2-5B is the removal of the closest solar array groups to the northeast (approximately 0.27 to 0.6 mile distant) of the Lake Tamarisk Desert Resort. The removal of the closest panel arrays from the viewer, however, opens up view corridors to more distant arrays as is evident in this KOP. This alternative also includes an approximately 2,290-ft long, 10- foot-high screening berm that would be installed immediately west of the relocated substation and BESS. The berm would effectively screen the BESS from view from KOP 4 and would screen some of the lower substation components as well. As illustrated in Figure 3.2-5D, the berm is perceptible as a light streak along the valley floor that is substantially screened by intervening vegetation. The resulting visual contrast from this alternative would be less than that caused by the proposed Project and Alternative 3 with weak to moderate form and line contrasts and weak color and texture contrasts. The overall level of change would be low to moderate.

As shown in KOP 5, the removal of arrays within one mile of Lake Tamarisk Desert Resort would eliminate the arrays immediately west and northwest of the substation. Additionally, the relocation of the substation and BESS farther north along SR 177, extension of the gen-tie line farther north, and installation of the berm (visible as a light streak along the valley floor) would reduce the visibility of those facilities from this KOP. However, the overall visual change would still be moderate, and the visual impact of the substation, BESS, and extended gen-tie line would simply be transferred farther north along SR 177. The overall level of change would remain as moderate.

The removal of arrays within one mile of Lake Tamarisk Desert Resort would not be visible from KOP 6 due to screening by intervening panel arrays. Like Alternative 3 and due to the viewing distance and screening by intervening panel arrays and vegetation, the relocation of the substation and BESS and extension of the gen-tie line under this alternative would not be a noticeable change when viewed from KOP 6. However, the solar arrays in close proximity to this KOP are a strong contrast to adjacent vegetation and landforms. As a result, this alternative would still result in strong levels of visual contrast and an overall high level of visual change.

As shown in KOP 7 (Figure 3.2-8D), taken from an 8-foot camera height (porch height), all arrays within one mile of the Lake Tamarisk would be eliminated, and an approximate 1,060-ft long, 10-ft high screening sand berm would be installed to partially screen panel arrays north of the berm. The remaining arrays to the north (beyond the one-mile exclusion area) are barely perceptible. The berm is visible as a light, horizontal line along the valley floor, substantially screened from view by intervening vegetation, and determined to have a weak to moderate color contrast compared to surrounding soil and vegetation. The resulting overall visual contrast would be weak, and the level of change would be low.

The overall level of visual change associated with this alternative would be consistent with the applicable BLM VRM Class IV management objective. Eliminating the solar arrays within the exclusion area and placement of the berms would reduce the level of change to low, as compared to the low to moderate level determined to exist for the Project and Alternative 3 and would represent a beneficial effect.

### 3.5.5 Cumulative Effects

The Project and alternatives, in combination with the 30 identified local energy projects (solar, pumped storage, and transmission substations), would contribute to cumulative visual impacts when viewed by sensitive viewing populations along I-10 and Hwy 177, from nearby communities and residences, from portions of JTNP, and in the surrounding mountains and wilderness (See EA Appendix A, Figure 1-4). While the DRECP identifies that DFAs are to be managed as VRM Class IV that provides for a high level of visual change, the DRECP FEIS identifies JTNP as a Visually Important Management Unit located adjacent to this DFA (DRECP Section III.20.3.1, page III.20-22). In addition, VRM Class II, allowing only a low level of visual change, are located adjacent and to the west of these DFA lands.

The Project and alternatives would add to these impacts from the introduction of substantial visual contrast associated with discordant geometric patterns in the landscape; the introduction of large-scale, built facilities with prominent industrial character; the creation of unnatural lines of demarcation in the valley

floor and inconsistent color contrasts; and from the addition of visible night lighting within the Chuckwalla Valley. For many travelers along I-10, the scenic experience would be degraded due to the perceived "industrialization" of the landscape.

The DRECP, FEIS Section IV.25.3.20 (page IV.25-101) states that during construction and decommissioning of renewable projects permitted under the DRECP, activities and equipment visible from residences, public roads, and public preserves would result in short-term diminished scenic quality for viewers. Examples include dust and exhaust emissions, removal of vegetation during site clearing, grading, presence of vehicles and equipment, mobilization and demobilization activities, material delivery and staging, assembly of components, site lighting, and construction and later removal of structures.

Renewable projects were anticipated to be developed in this DFA over the same general time frame resulting in the potential for overlap construction activities. There has been nearly continuous solar energy development in this vicinity since the start of the Desert Sunlight Solar Project in late 2011. A potential overlap of construction activities could occur with the adjacent Sapphire Solar Project.

Renewable energy facilities permitted under the DRECP would require equipment, structures, fencing, roads, and other elements to operate a facility that would have a long-term adverse effect on the visible landscape. Areas of persistent surface and vegetation disturbance and the presence of structures would create visual contrast in form, line, color, and texture as compared to pre-project conditions. The structure, size, and industrial character of utility-scale renewable energy and transmission facilities during operation and maintenance—as well as any associated glare, reflectivity, and lighting—would visually contrast with surrounding undeveloped land and result in long-term diminished scenic quality. The area near Desert Center is recognized in the DRECP as having the potential for experiencing a substantial introduction of dozens of renewable projects. In addition, projects such as the Devers-Palo Verde II 500 kV Transmission Line would contribute to the diminished scenic quality and contribute to a cumulative visual impact. Even after project removal and site reclamation are completed, visual contrast would remain.

As with the individual projects, the cumulative levels of visual change would be consistent with the applicable VRM Class IV management objective as highlighted by DRECP CMA DFA-VRM 1 (manage all DFAs as VRM Class IV to allow for industrial scale development). The substantial visual cumulative change would also be consistent with the anticipated visual change disclosed in the DRECP FEIS, which noted that the industrial character of utility-scale renewable energy and transmission facilities during their operation and maintenance, as well as any associated glare, reflectivity, and lighting, would visually contrast with surrounding undeveloped land and result in long-term diminished scenic quality (DRECP FEIS Section IV.20.3.2). No additional cumulative visual impacts have been identified that were not disclosed in the DRECP FEIS.

All alternatives, however, utilize irregular array boundaries that replicate natural features of the landscape to varying degrees and may help reduce the project's contribution to perceived industrialization, especially where intervening vegetation is preserved. This project retains landscape character in some portions of the project area and retains natural buffers between the project and the approved concentrated locations of the Desert Harvest, Desert Sunlight, Oberon, and northern segment of the Athos Solar projects. Alternative 4, Community Buffer Alternative would have the most prominent natural buffers given the removal of the project components north of Lake Tamarisk and a reduction of 386 permanent disturbance acres over Alternative 2: Proposed Action.

In addition, the Project and alternatives incorporate numerous CMAs and BPMs designed to reduce visual effects. These include implementation of a fugitive dust control plan, surface treatments of project structures and buildings to minimize visual intrusion and contrast by blending with (matching) the existing characteristic landscape colors, applying weather coating to the exterior security fencing to minimize visual impacts, implementing an effective night lighting management program to minimize fugitive light and protect night sky, and project design features including proper siting and location; reduction of project visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance.

## 3.6 Issue 5: Water Resources

### 3.6.1 Water Resources Issue Statement and Methodology for Analysis

*Would the project affect water resources, including surface water, floodplains, and groundwater?*

The impact analysis analyzes potential direct, indirect, and cumulative impacts of the proposed Project on water resources, including the Project's potential to adversely affect groundwater supplies, alter geomorphic features/processes, modify drainage and flooding conditions, induce erosion and sedimentation, and degrade water quality. The analysis also considers the potential for incremental impacts of the Project to combine with impacts of other projects and activities to adversely affect water resources. Mitigation measures to avoid or reduce potential impacts are identified, and the potential for residual impacts is evaluated.

### 3.6.2 Affected Environment

This section presents the existing local and regional water resources baseline for the Easley Renewable Energy Project (Project), the regulatory framework for water resources, and an assessment of the effects of the Project on groundwater and surface water sources. The Project area relevant to the analyses of water resources is the underlying Chuckwalla Valley Groundwater Basin (CVGB) and adjacent groundwater basins for groundwater resources and the Chuckwalla Valley Drainage Basin for surface water resources. The Easley Solar Project Hydrology Study by Westwood Professional Services (Westwood, 2023) is used as a primary source for the surface water information in this section.

Appendix M presents detail on the affected environment, including the following topics:

Surface Water

- Drainage Characteristics
- Climate and Precipitation
- Flooding
- Surface Water Quality
- Jurisdictional Waters

Groundwater

- Groundwater Overview
- Groundwater Trends
- Groundwater Levels
- Groundwater Quality
- Groundwater Storage Capacity
- Groundwater Recharge
- Groundwater Demand/Outflow

### 3.6.3 Direct and Indirect Environmental Effects

**Alternative 1: No Action Alternative**

The No Action Alternative would not result in any new construction and/or operational activities or any new associated ground-disturbing activities. Therefore, there would be no impacts to water resources. Other projects or linear facilities could potentially be developed at this location as the land is designated as a DFA. Any future project at this location would likely have similar impacts to the project and would be subject to its own environmental analysis under NEPA.

**Alternative 2: Proposed Action**

***Scoping Comments Related to Water Resources***

The U.S. Environmental Protection Agency (EPA) comments requested an estimate of the Project water usage during construction and operation and assessment of the impacts on local water users and resources. The EPA also requested that the Project consider cumulative impacts to ground water and the placement of solar panels to minimize erosion and hydrological impacts. Several commenters expressed concerns about the amount of water being used for the Project and whether it would impact the water supply for the Lake Tamarisk community.

Several commenters expressed concerns about the potential for flooding in the Lake Tamarisk community due to the modification of washes and removal of vegetation and adverse impacts with respect to stormwater quality and runoff.

Several commenters requested thorough aquifer studies and cited concerns about wells that were potentially impacted by the Oberon Project. Related comments requested an alternative Project water source to safeguard the aquifer, as well as a bond or guarantee to protect Lake Tamarisk Desert Resort against water supply issues until the aquifer recovers to pre-construction levels.

The Metropolitan Water District of Southern California (MWD) expressed concerns regarding the Project's potential impact on the Colorado River Aqueduct (CRA) and its associated facilities. MWD emphasized the importance of ensuring that Project activities do not interfere with the CRA's operations, which provides a significant portion of Southern California's water supply.

These comments and concerns are addressed in the analysis below. Note that the purpose of the Water Supply Assessment (POD Appendix P) according to the DRECP LUPA is to determine whether over-use or over-draft conditions exist within the project basin(s), and whether the project creates or exacerbates these conditions. The CMAs applicable to water resources are included in POD Appendix C. Compliance with these DRECP CMAs related to water resources will be determined by BLM as part of the EA analysis process.

***Groundwater Budget with the Project in Place***

The BLM amended its existing ROW regulations, at Title 43 CFR §2805.11(c)(2)(iv) and effective July 1, 2024, to allow for issuance of solar energy grants or leases for up to 50 years, plus initial partial year of issuance. To provide for the potential issuance of a 50-year ROW grant by the BLM and to determine whether there are sufficient supplies to sustain the Project, the Easley WSA (EIR Appendix G) conservatively extends the total projected period of the Project to 52-years. For the purpose of the CVGB water budget (see GSI, 2024 Section 6) and predictive Project water demand impacts analysis (see GSI, 2024 Sections 5.4 and 7) presented herein, 52 years is equivalent to the projected total duration of the Project, including construction (20 months), operations (48 years), and decommissioning (20 months).

The CVGB is assumed to be the water source for all groundwater demand (i.e., groundwater would not be imported from outside of the CVGB). Total water use by the Project would be up to 800 AF during the planned 20-month construction period and up to 50 AFY during the Project's operational and decommissioning periods. Based upon these quantities of water demand, a total of approximately 3,300 AF of water would be used by the Project over the Project's construction, operational, and decommissioning periods (52 years [i.e., 2-year construction period, 48-year operational period, and 2-year decommissioning period]).

Based on the budget balance given in Appendix M, Table M.4-1, the CVGB under average-year conditions would have a cumulative surplus of 5,200 AF during the 52-year period. The net CVGB surplus with the Project in place would therefore be 1,900 AF, or 36.5 percent of the surplus that would exist without the Project. By contrast, using the reduced recharge rates for precipitation and underflow (Appendix M, Table M.4-2), the 52-year deficit without the Project would be 228,800 AF, increased to 232,100 AF by the Project. The Project would contribute about 1.44 percent to this cumulative deficit.

***Surface Water Quality Impacts***

Construction of the Project would require ground-disturbing activities (excavation, grading, and compaction) of a minority of the ground surface (about 2.7 percent) of the project site for access roads, buildings, substation, and other features. In addition, approximately 54 percent of the project site would be levelled and smoothed for the solar facility. These ground-disturbing activities could result in soil erosion and lowered water quality through increased turbidity and sediment deposition into local ephemeral streams.

Main access to the project site would be via driveways to the east and west off SR-177/Rice Road. Aside from short segments to access each fenced development area, minimal new access roads would be required

outside of the right of way. Any access roads that would be required would be grubbed, graded, and compacted along sections not already improved, resulting in minimal disturbance to topography.

Alterations to site topography due to the site preparation would affect both RWQCB and CDFW jurisdictional waters of the State that traverse the Project site. Pending final engineering, approximately 398 acres of RWQCB jurisdictional waters consisting of unvegetated ephemeral dry washes are located on the Project site. Streambeds on the Project site classified as CDFW waters of the State consist of unvegetated ephemeral dry wash and 742 acres of desert dry wash woodland. A breakdown of both RWQCB and CDFW jurisdictional waters of the State for Project components is presented in the Jurisdictional Waters Report (see POD Appendix P).

The Applicant has committed to development and adherence to an SWPPP or SWPPP-equivalent document, which will require BMPs to prevent and control erosion and siltation during construction; prevent, contain, and mitigate accidental spills during construction; and prevent violation of water quality objectives or damaging beneficial uses identified in the water quality control plan. Development and adherence to a SWPPP would include BMPs to prevent and control erosion and siltation; prevent, contain, and mitigate accidental spills; and prevent violation of water quality objectives or damage to beneficial uses during construction and operation. Mitigation Measure HWQ-1 (Drainage Erosion and Sedimentation Control Plan (DESCP)) requires the development of a DESCP that would address and minimize erosion impacts during construction and operation.

Potential threats to surface water quality during operation and maintenance activities include potential increases in erosion and associated sediment loads to adjacent or downstream washes, and accidental spills of hydrocarbon fuels, greases, and other materials associated with operation of equipment on site. The Project would include electrical transformers, modifications to an existing electrical substation, an operations and maintenance building, and battery storage systems (BESS). There would be regulated hazardous materials on site. These materials are not intended to be released to the environment, but if spilled or otherwise accidentally released they could have the potential to contaminate surface. The HMP would be prepared to provide protocols for containment and clean-up of spills.

Alterations to site topography due to the site preparation would affect both RWQCB and CDFW jurisdictional waters of the State that traverse the Project site. Surface flow patterns would be affected by alteration to jurisdictional waters of the State (unvegetated ephemeral washes and desert wash woodland) on the site which could result in increased siltation or downstream erosion. Drainage controls, including berms and potentially channels, would be required in some areas to capture and direct stormwater flow around Project facilities such as the BESS.

Construction of the Project would avoid most desert dry wash woodland in accordance with BLM's CMA LUPA-BIO-RIPWET 1. Changes to streambeds classified as RWQCB and CDFW jurisdictional waters of the State would require the Applicant to obtain a LSAA from the CDFW and a waste discharge (WDR) permit from the Colorado River Basin RWQCB. The LSAA and WDR may require compensatory mitigation for impacts to waters of the State. Impacts related to surface water degradation due to alterations to waters of the State would be minimized or prevented through compliance with CDFW and RWQCB regulations and permits and implementation of Mitigation Measures (MM) BIO-3 (Minimization of Vegetation and Habitat Impacts), MM BIO-5 (Vegetation Resources Management Plan), MM BIO-14 (Streambed and Watershed Protection), MM HWQ-1 (Drainage Erosion and Sedimentation Control Plan (DESCP)), and MM HWQ-5 (Project Drainage Plan).

Existing State and federal water quality regulations, including the proposed SWPPP, are intended to ensure that water quality standards and waste discharge standards not be violated during construction or operations. However, portions of the site would be subject to flooding. Although mass grading is not proposed, some ground disturbance is expected, and some of the solar panels and other proposed structures would be placed in areas that are subject to flooding, creating a potential for erosion and sedimentation leading to potential water quality impacts during operations. Mitigation Measure HWQ-1 requires the development of a

Drainage Erosion and Sedimentation Plan that would address and mitigate erosion impacts during construction and operations.

Disturbance of soil during construction could result in soil erosion and lowered water quality through increased turbidity and sediment deposition into local streams. The longer of the two gen-tie options could result in fractionally greater soil erosion. Accidental spills or disposal of harmful materials used during construction could wash into and pollute surface waters or groundwater. The dry nature of the surface streams is such that should spills occur during construction, they could easily be cleaned up prior to surface water being contaminated. Groundwater is well below the maximum depth of excavation, resulting in little likelihood that groundwater could be affected from spills onto the surface during construction, additionally any spills would be contained and cleaned up promptly as required by the project Hazardous Materials Management Plan (HMMP) (see POD Appendix W included in EA Appendix E). Hazardous materials for construction equipment would be stored per the HMP and use, storage, transport, and disposal of hazardous materials will comply with all applicable regulations.

Potential threats to surface water quality during operation and maintenance include potential increases in erosion and associated sediment loads to adjacent washes, and accidental spills of hazardous materials associated with operation of equipment on site. Spills of hazardous materials on site could have the potential to contaminate surface or groundwater. Implementation of the HMMP and Mitigation Measure HWQ-1 (Drainage Erosion and Sedimentation Control Plan), compliance with regulatory requirements (see EA Appendix G, Regulatory Framework), and if determined necessary due to volumes of hazardous materials on the project site (see POD Appendix W), preparation of a Hazardous Materials Business Plan (HMBP) and site-specific Spill Prevention, Control, and Countermeasures Plan (SPCC) during project construction and operation would minimize these impacts.

Decommissioning of the project is expected to result in adverse impacts related to water resources similar to construction impacts. A Closure and Decommissioning Plan (see POD Appendix Y in EA Appendix E) is proposed to ensure public health and safety, environmental protection, and compliance with all applicable laws, ordinances, regulations, and standards, including those related to water quality.

Herbicides may be used on site during construction and operation and maintenance to control the spread of noxious weeds, invasive and non-native plant species and would volve the targeted use of BLM-CA approved herbicides and adjuvants applied to foliage using backpack sprayers as outlined in the IWMP (see POD Appendix N included in EA Appendix E). Pesticide use would be in accordance with an approved PUP (EA Appendix H). The water quality impacts of pesticide use were analyzed in the PEIS (pages 4-24 through 4-36). As noted above, the dry nature of most of the surface streams and drainages is such that should herbicide spills occur, spill sites could be cleaned up prior to contaminating surface waters. If a storm resulting in flash flooding or overland flows were to occur during or shortly after herbicide application, herbicides could pollute runoff and/or surface waters and be transported off site. However, the PUP includes Standard Operating Procedures (SOPs) to reduce impacts to water quality, including restrictions on use of herbicides prior to, during or immediately after storm events. Additionally, in compliance with LUPA-BIO-11 of the DRECP requires herbicide management CMAs to minimize water quality impacts.

***Flood Impacts***

Analysis of the completed Proposed Action during a 100-year storm shows flood depths of up to 1 foot along and near the desert washes that cross the project site and up to 6 feet in depth in small areas within the larger desert washes (POD Appendix BB included in EA Appendix E). Perimeter fencing for the Proposed Action could divert flood flows and substantially increase the flood potential on other property if clogged with debris normally carried by natural flood flows in the desert. Mitigation Measure HWQ-4 (Project Drainage Plan) would minimize fence-related diversions of flow by making design recommendations to prevent flow diversions and by implementing a project design which avoids most of the desert washes with larger areas of potential flooding.

Any structures placed in areas of potential 100-year storm flooding with depths estimated of up to 1 foot would be subject to flood damage. The solar panels will be on posts at least 4 feet above the ground. The access roads, being at-grade, would require maintenance after a flood event. The central substation/BESS location is not in an area mapped as prone to flooding. Mitigation Measures HWQ-1 (DESCP) and HWQ-4 (Project Drainage Plan) would ensure that the site designs include consideration of flood flows. Mitigation Measure HWQ-5 (Flood Protection) would ensure that all structures be protected from flooding and flood-related scour.

***Groundwater Supply Impacts***

The Proposed Action could use water from onsite wells, truck water from nearby sources, or a combination of both. Regardless of the water supply, water would come from the CVGB because the nearby water sources all use groundwater. Construction water use is expected to be 500 acre-feet (af) total for the anticipated construction period, and an average total annual water usage during operation is estimated to be up to 40 acre-feet per year (afy) for the assumed 50 years of operation. Pursuant to BLM (2016a and 2016b) requirements, a water supply analysis (WSA) must include an analysis of "estimates of the total cone of depression considering cumulative drawdown from all potential pumping in the basin, including the project, for the life of the project through the decommissioning phase." To evaluate the potential cone of depression induced by proposed Project groundwater pumping and cumulative drawdown from all cumulative projects (see GSI, 2024, Table 12), a predictive MODFLOW groundwater model (Model) was developed and projected for the 52-year duration of the Project.

The Project impacts are discussed in terms of the zones of influence of the total cone of depression considering cumulative drawdown as a result of the Project, cumulative projects, and the CVGB projected agricultural, municipal, and domestic pumping. The zone of influence after 2 years of Project construction pumping (500 AFY) is an approximately 4.5-mile radius cone of depression out to 0.5 feet of drawdown. Project operational and decommissioning pumping (50 AFY) for 50 years has a cumulative drawdown with an approximately 15-mile radius out to 0.5 feet of drawdown. This zone of influence also includes pumping from cumulative projects.

The modeling results indicate that impacts to groundwater levels as a result of Project and cumulative project pumping are confined to the northwestern part of the CVGB. Although most of the non-cumulative project pumping (see GSI, 2024 Section 5.8.2) in the CVGB occurs in the northwestern part of the CVGB, total agricultural, municipal, and domestic pumping is limited and the magnitude of the simulated draw-down is not anticipated to adversely affect existing water users and water rights claimants in the CVGB.

Based on the National Park Service estimates of baseline recharge, the CVGB is in overdraft and the Proposed Action would contribute about 1 percent to the groundwater overdraft after the 50-year life. Although the Proposed Action may result in a deficit in the CVGB, the projected worst-case scenario would not be a substantial increase to a deficit in the basin and would not be a substantial increase in groundwater use compared to groundwater use presented in the WSA. This is consistent with the DRECP FEIS Section IV.6.3.2 (page IV.6-20) which indicates that basins in the Proposed Action area can be characterized as stressed and groundwater use for proposed renewable energy projects would likely exacerbate depletion of water supply. A detailed discussion of the CVGB groundwater budget and groundwater use by the project is presented in the WSA included in POD Appendix P (GSI 2024).

Groundwater use during the project's construction, operation, and decommissioning would cause draw-down in the immediate vicinity of the project's supply well(s) and may adversely affect operation of nearby wells. Mitigation Measure HWQ 3 (Palo Verde Mesa Groundwater Basin Protection) would implement a Groundwater Monitoring, Reporting, and Mitigation Plan (GMRMP) for the Project in coordination with the RWQCB and BLM to ensure that groundwater wells surrounding Project supply well(s) are not adversely affected (i.e., chronic lowering of groundwater levels and degradation of groundwater quality) by Project activities.

***Groundwater Quality Impacts***

Groundwater quality impacts could occur during construction if contaminated or hazardous materials used during construction were to be released and allowed to migrate to the groundwater table. Given adherence to the Project Hazardous Materials Plan and the NPDES General Permit for Construction Activities, the potential for such impacts to groundwater quality are low.

The Project would produce sanitary wastewater from the O&M building, which would be treated and disposed of at the Project using a septic disposal system. The federal (EPA), state (RWQCB) and local (Riverside County Department of Environmental Health) governments have requirements for septic system design, including requirements for percolation, vertical distance from the groundwater table, and setback from the nearest groundwater well. The use and application of septic fields is an established practice as a method of wastewater treatment. The use of a septic system within the designed system capacity is not anticipated to cause groundwater quality degradation.

DWR has categorized the CVGB as a low-priority basin under the SGMA (DWR, 2020). Per SGMA, due to the CVGB classification as a low-priority basin, a Groundwater Sustainability Plan (GSP) is not required to be developed for the CVGB. As of this writing, no GSP has been developed for the CVGB.

The Project is located in the jurisdiction of the Colorado River Basin RWQCB. The Water Quality Control Plan developed by the RWQCB establishes water quality objectives, including narrative and numerical standards, to protect the beneficial uses of surface water and groundwater in the region. The Water Quality Control Plan describes implementation plans and other control measures designed to ensure compliance with statewide plans and policies and documents comprehensive water quality planning. The Water Quality Control Plan for the Colorado River Basin Region (RWQCB, 2019) lists specific beneficial uses for groundwater. Beneficial uses of the groundwater in the CVGB are Municipal and Domestic Supply (MUN), Industrial Service Supply (IND), and Agriculture Supply (AGR).

Water quality in the CVGB has concentrations of sulfate, chloride, fluoride, and TDS that are higher than recommended levels for drinking water use. Likewise, elevated concentrations of boron, TDS, and percent sodium impair groundwater for irrigation use. In general, groundwater in the CVGB is sodium chloride to sodium sulfate-chloride in character (DWR, 2004). Recent available water quality data near the proposed Project is limited to four wells, with nitrate being the only constituent analyzed in three of the four wells. Reported nitrate concentrations in all four wells were below the federal and California Maximum Contaminant Level of 10 mg/L (nitrate measured as nitrogen). Based on the simulated drawdown due to Project and cumulative project pumping, and the size and storage capacity of the CVGB, the Project is not anticipated to result in changes in water quality that affect other beneficial uses.

Mitigation Measures (MMs) to reduce Impact HWQ-1 include MM HWQ-1 (Drainage Erosion and Sedimentation Plan) and MM HWQ-2 (Septic System Review and Permitting) which would enable the Riverside County Department of Environmental Health to ensure that the Project is compliant with Riverside County, RWQCB, and EPA regulations and protective of water quality. Mitigation Measure HWQ 3 (Palo Verde Mesa Groundwater Basin Protection) would implement a Groundwater Monitoring, Reporting, and Mitigation Plan (GMRMP) for the Project in coordination with the RWQCB and BLM to ensure that groundwater wells surrounding Project supply well(s) are not adversely affected (i.e., chronic lowering of groundwater levels and degradation of groundwater quality) by Project activities.

**Alternative 3: Reduced Acreage Alternative**

The Reduced Acreage Alternative would remove approximately 50 acres of solar panels closest to the community of Lake Tamarisk. In addition, the onsite substation and BESS would be moved at least 0.7 miles to the northeast. The length of the 500 kV gen-tie line under the Reduced Acreage Alternative would be approximately 0.8 miles longer than the proposed 500 kV gen-tie line. All other Project features would be the same as the Proposed Action. Surface water impacts would remain the same as for the proposed Project, but slightly reduced in magnitude due to the reduced footprint. The Reduced Acreage Alternative

would require the same mitigation measures to be implemented as would be required for the Proposed Action, with the same impact significance. Therefore, because both the Proposed Action and Alternative 3 would result in less than significant impacts with adherence to all applicable regulations and mitigation measures, impacts related to hydrology and water quality from Alternative 3 would be similar to those of the Proposed Action.

The footprint of the proposed Project would be reduced by approximately 50 acres of solar arrays under the Reduced Acreage Alternative; however, the corresponding reduction in estimated water demand for Project construction and operation is anticipated to be de minimis.

In June 2023, BLM issued a Proposed Rule to amend its existing ROW regulations, issued under authority of the Federal Land Policy and Management Act (FLPMA), and is considering issuing Right-of-Way (ROW) grants for durations of up to 50 years (BLM, 2023). To prepare for potential issuance of a 50-year ROW Grant by the BLM (outside of CEQA) and to determine whether there are sufficient supplies to sustain the Project, the Easley WSA conservatively extends the total projected period of the Project to 52-years. For the purpose of the CVGB water budget (see GSI, 2024 Section 6) and predictive Project water demand impacts analysis (see GSI, 2024 Sections 5.4 and 7) presented herein, 52 years is equivalent to the projected total duration of the Project, including construction (20 months), operations (48 years), and decommissioning (20 months).

The Project would use up to 800 AF during the planned 20-month construction period and up to 50 AFY during the Project's operational and decommissioning periods. The Project would use a total of approximately 3,300 AF over the assumed 52-year life of the Project. If the estimated water demand for the Project was used equally per acre (the Project is proposed on approximately 3,735 acres), the Project would use approximately 0.21 AF per acre during construction and 0.013 AF per acre per year during the operational phase of the Project. Assuming the equal water use per acre, the Reduced Acreage Alternative would also require approximately 0.21 AF per acre during the construction phase and 0.013 AF per acre per year during the operational phase of the Project. Therefore, the potential impacts on groundwater under the Reduced Acreage Alternative would be consistent with those discussed for Alternative 2 (Proposed Action).

**Alternative 4. Community Buffer Alternative**

The Community Buffer Alternative would be located within the Project footprint and be like the Proposed Action, however, solar panels would be removed within 1 mile to the north of the residences in the Lake Tamarisk Desert Resort totaling 530 acres (see EA App. A, Figure 2-10). This alternative includes the construction of two earthen berms to screen the view of the solar facility from the Lake Tamarisk vicinity, and would relocate the Project's substation, BESS facility, and O&M building to a location adjacent to Hwy. 177, approximately 1.25 miles northeast of the substation site in the Proposed Project. Removal of all panels within the area indicated in this alternative would result in approximately 386 acres being eliminated from project development, as compared to the Proposed Project.

The relocation of the Project substation, BESS, and O&M building in the Community Buffer Alternative to a 17-acre area adjacent to Hwy 177 would increase the length of the Project's gen-tie line to approximately 8.15 miles over the 6.7-mile length of the Proposed Project. Routing the gen-tie line across the Project site would increase the gen-tie length by 1.45 miles, as compared to the Proposed Project, and would preclude installation of solar panels along the gen-tie's 175-foot-wide right-of-way. This would result in the loss of nearly 14 acres of the solar field.

The berms, constructed of earth and sand, would be 10-feet high, 20- feet across, and have a 1:1 slope, and would be 490- and 2,904-feet in length for the northern and easterly berm, respectively. Material would have to be imported to construct the berms given the lack of potential fill material in these vicinities. Each berm would require approximately 2,000 cubic feet of fill each, for a total of 4,000 cubic feet.

***Groundwater Budget***

The Community Buffer Alternative would have positive effects on water use compared to the other two action alternatives. As addressed in the previous two alternatives, the Project would use up to 800 AF during the planned 20-month construction period and up to 50 AFY during the Project's operational and decommissioning periods. The Project would use approximately 3,300 AF over the assumed 52-year life of the Project. If the estimated water demand for the Project was used equally per acre (the Project is proposed on approximately 3,735 acres with a total of 1,995 acres encumbered by facility components), the Project would use approximately 0.27 AF per acre during construction and 0.01 AF per acre per year during the operational phase of the Project.

Assuming equal water use per acre, the Community Buffer Alternative would encumber 14.2% less acres with facility components, totaling 3,205 acres, out of the original 3,735-acre project area. This would result in 686.4 AF water use during the planned 20-month construction period and 43 AFY during the project's operational and decommissioning periods. Assuming equal water use per acre, the Project would use approximately 2,836 AF over the assumed 52-year life of the Project. Within the 3,205-acre project area, this would equate to 0.214 AF per acre during construction and .013 AF per acre per year during the operational phase of the Project.

Based on the budget balance given in Table M.4-1 (Appendix M), the CVGB under average-year conditions would have a cumulative surplus of 5,200 AF during the 52-year period. The net CVGB surplus with the Project in place would therefore be 2,364 AF, or 45 percent of the surplus that would exist without the Project. By contrast, using the reduced recharge rates for precipitation and underflow (Table M.4-2, Appendix M), the 52-year deficit without the Project would be 228,800 AF, increased to 231,636 AF by the Project. The Project would contribute about 0.124 percent to this cumulative deficit. Therefore, the potential impacts on groundwater under the Community Buffer Alternative would be slightly better than those discussed for Alternative 2 (Proposed Action).

***Surface Water Quality Impacts***

Nearly all the areas within the buffer area that exhibit 100-year maximum flow depths over 1 foot, with 100-year peak velocities up to 2.5fps and have 100-year scour depths up to 1.5 ft are in areas that are not identified for development in this or the Proposed or Reduced Acreage Alternatives. Therefore, there would be little positive effect of the buffer area as compared to the other alternatives.

Installation of earthen berms, however, would alter stormwater flow on and offsite, which could affect surface water flow and result in flooding or changes in drainage patterns on adjacent parcels. The Westwood study shows that the westernmost berm is in an area of minimal and shallow flooding. This berm, which runs somewhat parallel with the flow pattern, is unlikely to create a significant adverse flow diversion, however, flows would be affected in the immediate vicinity of the berm. The eastern berm intersects one of the wide flood concentrations that could have water flow depths of up to 1.5 feet. While the Westwood study shows that under existing conditions, this flow is mostly directed to the north a few hundred feet downstream due to previous land uses, the berm would alter hydrologic conditions in the vicinity of the berm, including having effects on erosion potential and wildlife communities that depend on existing flow patterns.

Given the windy desert environment and sandy soil in this area, earthen berms would be difficult to stabilize with vegetation, and therefore, could become a source of wind and water erosion, along with downstream sedimentation that could impact fluvial processes. Similarly, although there are no mapped sand transport corridors across or adjacent to the Project site, sand is likely carried by fluvial processes (surface flow and active washes) across the site and ultimately blown to the dune system to the east.

The size of the berms would necessitate large quantities of dirt/sand fill. The berms would require approximately 2,000 cubic feet of fill each, for a total of 4,000 cubic feet. It is unlikely that this quantity of fill could be sourced from the Project area without adverse impacts including to wildlife (native habitat).

Therefore, it is likely that fill would need to be imported from off-site with numerous potential effects including from activities associated with removal, transportation, construction, and site restoration during berm construction; importation of invasive species to the berm sites; impacts on wildlife and plant species and their habitat; impacts to local residents and land uses; and from maintenance of the berms over the life of the project.

The requirements to comply with DRECP CMAs, California Drainage Law, and CEQA would necessitate major design steps that would minimize adverse effects, such as placing culverts under the berms, installing channels and retention ponds to direct storm flows and ensure drainage patterns during monsoonal rain events remain unchanged, and long-term requirements to maintain these facilities. The berms and associated drainage infrastructure, however, would reduce the area available for solar infrastructure and electrical output from the project.

Implementing the California Drainage Law would require preparation of a drainage plan that demonstrates, among other things, adequate design to protect from flooding, erosion and scour, and to do so without adversely affecting adjacent property, inducing erosion, or concentrating or diverting flows. Relevant CMAs would have to be assessed and implemented to protect resources including LUPA-BIO-IFS-3 (protect desert tortoise movements), LUPA-BIO-9 (drainage, erosion, and sedimentation control actions), LUPA-BIO-10 (invasive species control), LUPA-BIO-15 (design measures to minimize new site disturbance, effects on soils, disturbance to topography, and removal of vegetation), LUPA-BIO-DUNE-2 & 3 (maintain quality and function of Aeolian transport corridors and sand deposition zones and associated hydrology), LUPA-SW-20 (protecting surface waters), LUPA-SW-22 (avoiding hydrologic alterations that could reduce water quality or quantity for all applicable beneficial uses), and DFA-VPL-VRM-2 (incorporating visual design standards).

### 3.6.4 Cumulative Effects

#### 3.6.4.1 Geographic Scope

***Surface Water***

The Project is in the Chuckwalla Hydrologic Unit which drains entirely to the Palen and Ford Dry Lakes. There is no natural outlet for this flow to other hydrologic units. Therefore, the area for cumulative hydrology and water quality analysis is confined to this hydrologic unit. Existing, proposed, and reasonably foreseeable projects from Tables M.2-1 and M.2-2 (Appendix M) and located within this same hydrologic unit consist of eight solar energy projects (Desert Sunlight, Desert Harvest, Palen, Athos, Oberon, Victory Pass, Redonda and Arica), five power transmission projects (Red Bluff Substation, Devers-Palo Verde Transmission Line, Devers-Colorado River Transmission Line, Blythe Energy Project Transmission Line, and Desert Southwest Transmission Line), and two other projects (Eagle Mountain Pumped Storage Project and Skybridge-Eagle Mountain Hydrogen Project).

***Groundwater***

A cumulative impact scenario on groundwater was completed in the Project WSA. The cumulative impact scenario uses the CVGB baseline groundwater budget presented in the Project WSA using normal and reduced recharge assumptions (see Tables M.2-1 and M.2-2 in Appendix M). The cumulative impact scenario accounts for all existing water and estimated water use from known qualifying projects. Pursuant to SB 610, the Project WSA is only required to consider existing water use and estimated water use from known qualifying projects within the CVGB. Qualifying projects included in the Project WSA cumulative impact scenario are included in Figure 3 in the WSA Figure 3 in POD Appendix P.

#### 3.6.4.2 Cumulative Impact Analysis

***Surface Water***

Cumulative impacts to hydrology and water quality include the impacts of the Easley Project together with those listed above, most of which are similar solar power projects. These cumulative projects have the potential to contribute to cumulative hydrologic and water quality impacts in the Chuckwalla Valley Hydrologic Unit. These cumulative projects have the potential to introduce new or exacerbate existing pollutant generation associated with construction and operation. These projects could contribute to increased runoff due to increases in impervious surfaces. All cumulative projects are crossed by watercourses that could generate flooding, with similar flooding impacts as described for the proposed Project.

All foreseeable future projects in the Chuckwalla Valley Hydrologic Unit would be subject to similar measures as the proposed Project when obtaining the required permits that implement compliance with state and federal clean water regulations and Riverside County floodplain development regulations. As all projects would go through an environmental review process, they would be subject to similar mitigation measures as those proposed to address potential water quality impacts for the proposed Project. Many of the projects (Arica, Victory Pass, Palen, and Desert Harvest) do or would likely avoid major drainages that cross their sites. Because the Project is in a similar hydrologic setting and most of the cumulative projects are similar projects, individual project impacts are expected to be reduced to less than significant through compliance with regulations and mitigation. Therefore, the combined effects to water quality from the cumulative projects within the geographic scope would not be considered cumulatively significant and the proposed Project would not have a considerable contribution to the cumulative impact.

***Groundwater***

In June 2023, BLM issued a Proposed Rule to amend its existing ROW regulations, issued under authority of the Federal Land Policy and Management Act (FLPMA), and is considering issuing Right-of-Way (ROW) grants for durations of up to 50 years (BLM, 2023). To prepare for potential issuance of 50-year ROW Grant by the BLM and to determine whether there are sufficient supplies to sustain the Project, the Easley WSA conservatively extends the total projected period of the Project to 52-years. For the purpose of the CVGB water budget (see GSI, 2024 Section 6) and predictive Project water demand impacts analysis (see GSI, 2024 Sections 5.4 and 7) presented herein, 52 years is equivalent to the projected total duration of the Project, including construction (20 months), operations (48 years), and decommissioning (20 months). The Project would use up to 800 AF during the planned 20-month construction period and up to 50 AFY during the Project's operational and decommissioning periods.

A cumulative impact scenario on groundwater was completed in the Project WSA. The results indicate the Project contributes approximately 2 percent of the total cumulative operational extractions for all qualifying projects not already in place (cumulative projects; see GSI, 2024, Table 12). Development of a 52-year (equivalent to the total Project duration) groundwater budget projection, assuming average precipitation and the Project and all cumulative projects in place, indicates there would be an initial groundwater deficit of 6,960 AF in the year 2024 (first year of Project construction). The cumulative groundwater deficit would increase to approximately 118,420 AF by the end of the 52-year period. Without the Project and all other cumulative projects in place, there would be a surplus of 5,200 AF at the end of the 52-year period.

The same analysis using reduced infiltration and underflow estimates results in a total cumulative project deficit of about 352,760 AF, to which the Project would contribute about 1 percent, or 3,500 AF. Using these inflow estimates, the CVGB would not recover the groundwater deficit with or without the Project.

Using the driest 52-year period recorded at the Blythe Airport meteorological station, with the Project and all cumulative projects in place, the CVGB total groundwater deficit at the end of the 52-year period would be approximately 112,560 AF. Using reduced recharge data, the 52-year deficit would total approximately 347,640 AF.

Pursuant to BLM (BLM, 2016a and 2016b) requirements, a WSA must include an analysis of "estimates of the total cone of depression considering cumulative drawdown from all potential pumping in the basin, including the project, for the life of the project through the decommissioning phase." To evaluate the potential cone of depression induced by proposed Project groundwater pumping and cumulative drawdown from all cumulative projects (see GSI, 2024 Table 12), a predictive MODFLOW groundwater model (Model) was developed and projected for the 52-year duration of the Project.

The Project impacts are discussed in terms of the zones of influence of the total cone of depression considering cumulative drawdown as a result of the Project, cumulative projects, and the CVGB projected agricultural, municipal, and domestic pumping. The zone of influence after 2 years of Project construction pumping (500 AFY) is an approximately 4.5-mile radius cone of depression out to 0.5 feet of drawdown. Project operational and decommissioning pumping (50 AFY) for 50 years has a cumulative drawdown with an approximately 15-mile radius out to 0.5 feet of drawdown. This zone of influence also includes pumping from cumulative projects.

The modeling results indicate that impacts to groundwater levels as a result of Project and cumulative project pumping are confined to the northwestern part of the CVGB. Although most of the non-cumulative project pumping (see GSI, 2024 Section 5.8.2) in the CVGB occurs in the northwestern part of the CVGB, total agricultural, municipal, and domestic pumping is limited and the magnitude of the simulated drawdown is not anticipated to adversely affect existing water users and water rights claimants in the CVGB.

The Project's contribution to cumulative impacts on groundwater would be actively monitored through the development and implementation of a GMRMP for the Project in coordination with the RWQCB and BLM to ensure that groundwater wells surrounding Project supply well(s) are not adversely affected (i.e., chronic lowering of groundwater levels and/or degradation of groundwater quality) by Project activities (MM HWQ-4). The Project's contribution to cumulative impacts would also be monitored through the development of a Colorado River Water Supply Plan (CRWSP) to monitor groundwater extractions from the Project operated on- or off-site well(s) and prevent, replace, or mitigate Project impacts that deplete the PVMGB groundwater budget to prevent impacts (MM HWQ-3). The CRWSP would be submitted to the U.S. Bureau of Reclamation and BLM prior to commencement of any Project construction activities. The CRWSP would be based on the results of the Project GMRMP. The GMRMP for the Project would be developed in coordination with the RWQCB and BLM to ensure that groundwater wells surrounding Project supply well(s) are not adversely affected (i.e., chronic lowering of groundwater levels) by Project activities. With the implementation of these mitigation measures, the Project would not make a considerable contribution to potential cumulative reductions in groundwater supplies.

The proposed expansion of Joshua Tree National Park and creation of Chuckwalla National Monument, if adopted, would re-designate existing federal lands in the Project vicinity but would not create physical changes in the environment that would contribute to cumulative impacts. By excluding development within these areas, the potential need for a water supply for such development would be avoided.

Mitigation Measures MM BIO-3, MM BIO-5, MM BIO-14, and MMs HWQ-1 through MM HWQ-6 would be implemented to address potential hydrology and water quality impacts for the Proposed Action. No additional mitigation is required.

The Proposed Action's contribution to the cumulative impact related to surface water, flooding, and groundwater would be minor. The cumulative groundwater use as described in the WSA indicates that with recharge estimates and all cumulative projects in place the CVGB would suffer an initial overdraft due to the higher use of water during project construction, and then begin to recover to a reduced overdraft (deficit) by the end of the project life, with the Project contributing less than 2 percent to the ending cumulative deficit (see POD Appendix P). This is consistent with DRECP FEIS Section IV.25.3.6 (page IV.25-44), which notes that use of groundwater for the renewable energy facilities permitted under the DRECP would combine with the use of groundwater for the cumulative projects to result in a cumulative lowering of groundwater levels affecting basin water supplies and groundwater discharge. Because the groundwater

basin is potentially in overdraft, and the large use of water by this Project, the impacts would remain cumulatively adverse. Further, all projects on federal land would be subject to DRECP CMAs; each of the cumulative projects would be subject to NEPA and/or CEQA environmental reviews as needed, and all would be subject to the regulations described in the regulatory framework (Appendix G). All would be required to demonstrate a sustainable water supply and to implement BMPs to reduce impacts to water supply and water quality.

# 4.0 CONSULTATION AND COORDINATION

## 4.1 General Consultation and Coordination

The Proposed Action is located entirely on federally managed land and BLM is the lead agency under the National Environmental Policy Act (NEPA), 42 U.S.C. section 4321 et seq. Federal, state, and local agencies have been or will be consulted as part of the BLM's review of the project. Those agencies with jurisdiction will be contacted in order to obtain the necessary permits and approvals for implementation of the project.

## 4.2 National Historic Preservation Act Section 106 Compliance

The BLM consults with Native American tribes on a government-to-government basis in accordance with several authorities including NEPA, Section 106 of the National Historic Preservation Act of 1966 (NHPA) (54 USC 300101), as amended; the American Indian Religious Freedom Act of 1978 (42 USC 1996), as amended; and Executive Order (EO) 13007 (May 24, 1996), concerning Indian Sacred Sites; EO 13175 (Nov. 6, 2000), concerning Consultation and Coordination With Indian Tribal Governments; the Presidential Memorandum of April 29, 1994 (59 Fed. Reg. 22951 1994); and the Desert Renewable Energy Conservation Plan (DRECP) Programmatic Agreement (2016; as described at 36 C.F.R.§800.14 (b)). The BLM's tribal consultation policy is found in the BLM 1780 Manual (Tribal Relations) and 1780-1 Handbook (Improving and Sustaining BLM-Tribal Relations).

Section 106 of the NHPA requires Federal agencies to consider the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on those undertakings. Under Section 106, an undertaking collectively refers to all projects, activities, or programs funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a federal agency, those carried out by Federal financial assistance, and those requiring a Federal permit, license, or approval.

Federal agencies must meet their Section 106 responsibilities as set forth in the regulations (36 CFR Part 800). Federal agencies must conduct the necessary studies and consultations to identify cultural resources that may be affected by an undertaking, evaluate cultural resources that may be affected to determine if they are eligible for the National Register of Historic Places (NRHP) (that is, whether identified resources constitute historic properties), and assess whether such historic properties would be adversely affected. Historic properties are resources listed on or eligible for listing on the NRHP (36 CFR 800.16[l][1]). A property may be listed in the NRHP if it meets criteria provided in the NRHP regulations (36 CFR 60.4). Typically, such properties must also be 50 years or older (36 CFR 60.4[d]).

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, or association and

- That are associated with events that have made a significant contribution to the broad patterns of our history; or
- That are associated with the lives of persons significant in our past; or

- That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess artistic value, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- That have yielded, or may be likely to yield, information important in prehistory or history.

Section 106 defines an adverse effect as an effect that alters, directly or indirectly, the qualities that make a resource eligible for listing in the National Register (36 CFR 800.5[a][1]). Consideration must be given to the property's location, design, setting, materials, workmanship, feeling, and association, to the extent that these qualities contribute to the integrity and significance of the resource. Adverse effects may be direct and reasonably foreseeable or may be more remote in time or distance (36 CFR 8010.5[a][1]).

The DRECP Programmatic Agreement (PA) establishes the process the BLM will follow to fulfill its responsibilities under Section 106 of the NHPA for site-specific, renewable energy project application decisions within the DRECP Land Use Plan Amendment area [Stipulation I(A)(2)]. The DRECP PA process was adhered to for the Easley Renewable Energy Project.

Key aspects of the Section 106 and DRECP PA processes include the following components, which are described and compared in detail below, along with a summary of compliance by the Easley Project.

- Consultation and Pre-Application Meeting
- Area of Potential Effect
- Identification Efforts; and
- Evaluations of Eligibility and Findings of Effect.

The mitigation measures for historic properties (see EA Appendix F) specify the required avoidance strategies for each resource to ensure that no known eligible resources would be adversely affected. The Easley Project mitigation measures also require the development of a comprehensive plan to manage post-review discoveries and unanticipated effects during project construction, pursuant to DRECP PA Stipulation V(A). Additional details regarding the DRECP Programmatic Agreement are provided in EA Appendix G (Regulatory Framework).

### 4.2.1 Consultation and Pre-Application Meeting

In addition to the consulting parties defined under Section 106 (36 CFR 800.2(c)), the DRECP PA provides that the BLM should enter into formal consultation with the State Historic Preservation Officer (SHPO) during the pre-application phase [Stipulation II(B)] and with Indian tribes and tribal organizations at the earliest stages of project planning [Stipulation II(E)]. As part of this early consultation process, the DRECP PA requires that the BLM hold a pre-application meeting with the Applicant and invite the SHPO, tribes and tribal organizations, and any other potential consulting parties prior to formal acceptance of any ROW application, and prior to initiating the NEPA review process [Stipulation III(B)(1)]. The DRECP PA also specifies when the BLM shall invite the ACHP to participate in consultation.

The BLM notified and invited twelve local Native American tribes to participate in government-to-government consultation on this Project by letter dated December 7, 2022. These letters included an invitation to attend a pre-application meeting and site visit on January 12, 2023. The BLM sent additional letters dated March 3, 2023, to continue this consultation and provide the Agency proposed APE and identify efforts for the undertaking (Work Plan and Research Design) consistent with Stipulation III (C)(1)(a) of the DRECP PA.

### 4.2.2 Area of Potential Effect and Identification Efforts

The Area of Potential Effect (APE) is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties. The BLM defined the APE and

identification efforts consistent with Stipulation IV (A) of the DRECP PA. A Class I and Class III survey were performed on the entire APE, determined to be 3,888-acres. The revised APE includes the footprint of the energy-generating facility, a 7.73-mile 500 kV gen-tie line with a 175-foot-wide corridor, access roads, gen-tie pull-tensioning sites, and all laydown areas. The APE for visual, auditory, and atmospheric effects (VAA APE) is defined as a 1-mile-wide extension of the direct APE and totals 22,372 acres located on both privately owned and BLM-managed public lands.

DRECP PA Stipulation VI(B)(2) requires peer review of the BLM Class III inventory. A Class I records search of an earlier proposed 6,426-acre APE included a 1-mile buffer extending from the direct APE and indicated 17 previous investigations covered some portion of the APE. The Class I identified 447 previously recorded cultural resources (49 prehistoric archaeological sites, 207 historic period archaeological sites, 8 multicomponent sites, 75 prehistoric isolated artifacts, 39 historic period isolated artifacts, and 9 historic period built-environment resources, and 104 resources of undetermined age and association). Eighty-one of these previously recorded resources are within the revised direct 3,888-acre APE (6 prehistoric period archaeological sites, 22 historic period archaeological sites, 3 multicomponent sites, 3 prehistoric isolated artifacts, and 32 historic period isolated artifacts (Hinojosa et al. 2023; PaleoWest).

A BLM Class III survey of the direct APE was performed in March and April 2023. The survey resulted in the documentation of 51 previously recorded cultural resources (27 archaeological sites, 17 isolated artifacts, and 7 built-environment resources) and 22 newly recorded cultural resources (5 archaeological sites, 15 isolated artifacts, and 2 built environment resources). Most of the resources date to the historic period with 4 resources dating to the prehistoric period. One cultural resource contains both prehistoric and historic elements (Hinojosa et al. 2023; PaleoWest).

### 4.2.3 Evaluations of Eligibility and Findings of Effect

The BLM applies the National Register of Historic Places criteria (36 CFR part 63) and DRECP PA guidance to make proposed eligibility determinations of all properties identified within the APE that have not been previously evaluated for NRHP eligibility. The evaluations are based on the results of the cultural resources studies and any information provided by Indian tribes during consultation. If the BLM determines any of the NRHP criteria are met and the SHPO/Tribal Historic Preservation Officer agrees, the property is considered eligible for the NRHP for Section 106 purposes. The NRHP eligibility criteria (Criteria A through D) are described in Appendix D.

After the cultural resources are evaluated for NRHP eligibility, the BLM will apply the criteria of adverse effect. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association (36 CFR §800.5).

Consistent with Stipulation IV(C)(1)(b) of the DRECP PA, BLM is required to provide its proposed determinations of eligibility and findings of effect to the SHPO and all consulting parties. A letter to provide the Agency's proposed determinations of eligibility and findings of effect for the proposed Project and to request SHPO concurrence, pursuant to Stipulation III (C)(1)(b) of the DRECP PA was transmitted March 27, 2024. SHPO concurrence was received May 6th, 2024, that concurred with the BLM's findings of no effect.

## 4.3 Tribal Consultation

The BLM notified and invited the Agua Caliente Band of Cahuilla Indians, Augustine Band of Cahuilla Indians, Cabazon Band of Mission Indians, Cahuilla Band of Indians, Chemehuevi Indian Tribe, Cocopah Indian Tribe, Colorado River Indian Tribes, Fort Mojave Indian Tribe, Fort Yuma Quechan Indian Tribe, Morongo Band of Mission Indians, Soboba Band of Luiseño Indians, Torres-Martinez Desert Cahuilla Indians, and Twenty-Nine Palms Band of Mission Indians to participate in government-to-government

consultation on this Project, by letter dated December 7, 2022. These letters included an invitation to attend a pre-application meeting and site visit on January 12, 2023. Letters dated March 3, 2023, provided the Agency proposed APE and identification efforts for the undertaking (Work Plan and Research Design) consistent with Stipulation III (C)(1)(a) of the DRECP PA.

The BLM also extended an offer March 3, 2023, to continue government to government consultation. The BLM provided the results of their determinations of eligibility and findings of effect to tribes on March 1, 2024, and provided 30 days for review and comment. The Agua Caliente Band of Cahuilla Indians responded concurring with the BLM's determinations and requested to be kept informed if there are changes to the scope of the project that may affect the BLM's determinations. The Cahuilla Band of Indians also responded on March 20, 2024, stating they did not have further comments on the determinations, but wanted to be kept informed on the project and potential future tribal construction monitoring. No other responses were received.

## 4.4 Endangered Species Act Section 7 Consultation

The federal Endangered Species Act (ESA) protects threatened and endangered species by prohibiting federal actions that would jeopardize the continued existence of such species or result in destruction or adverse modification of their critical habitat. If adverse impacts to listed species are anticipated, Section 7 of the ESA requires consultation regarding protection of such species be conducted with the U.S. Fish and Wildlife Service (USFWS) prior to project implementation.

The BLM submitted a draft Biological Assessment (BA) to the USFWS on June 13, 2024, covering both private and BLM lands within the Project area. The USFWS responded to the BLM, within their 30-day review period, as to the adequacy of this BA and the BLM and FWS are continuing the formal consultation process under Section 7 of the ESA.

# Appendix A

Maps and Figures

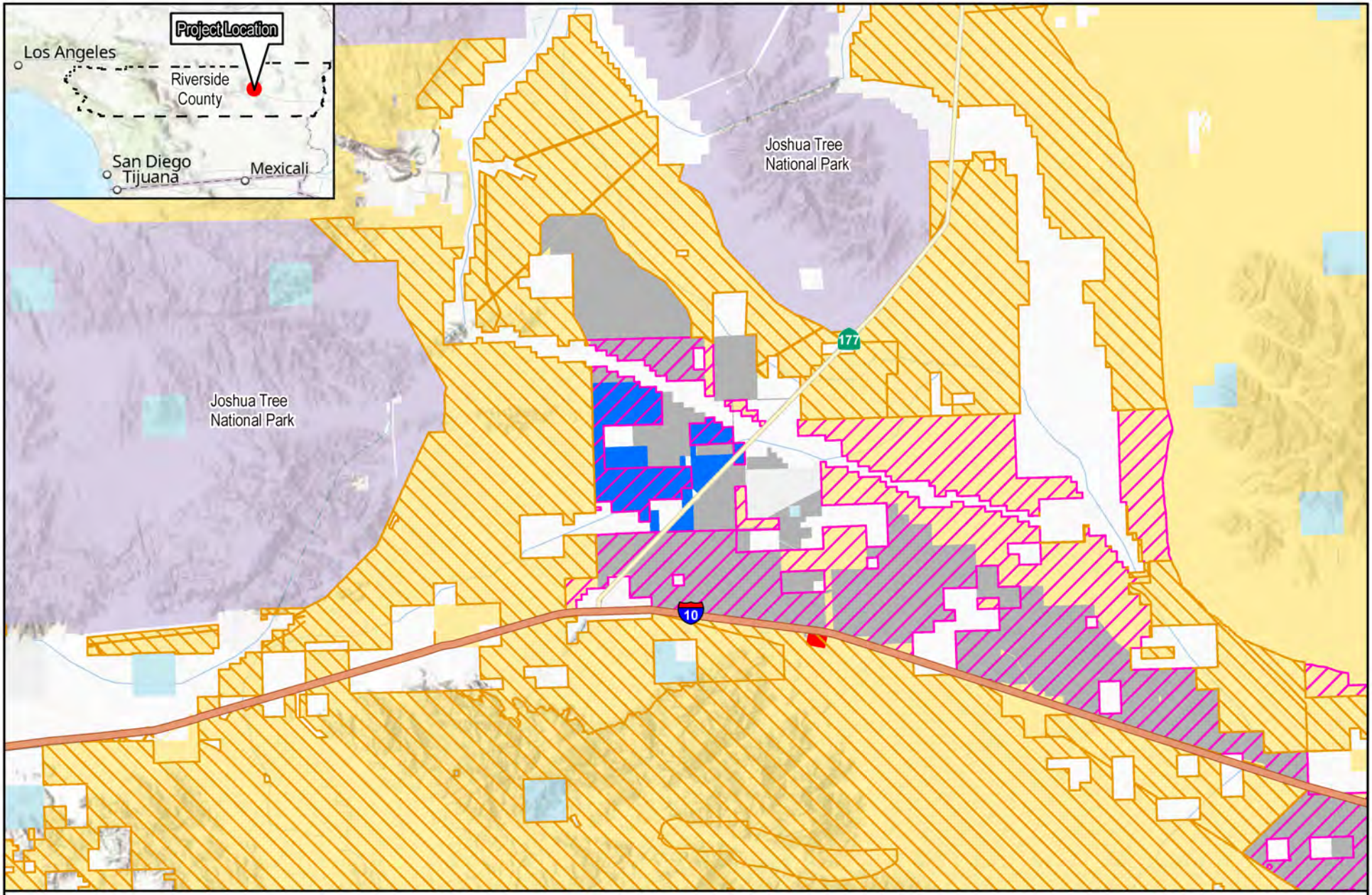



**Figure 1-1**
**Project Vicinity**

Sources: Aspen, 2023; Intersect Power, 2023; BLM, 2023; Esri, 2023.

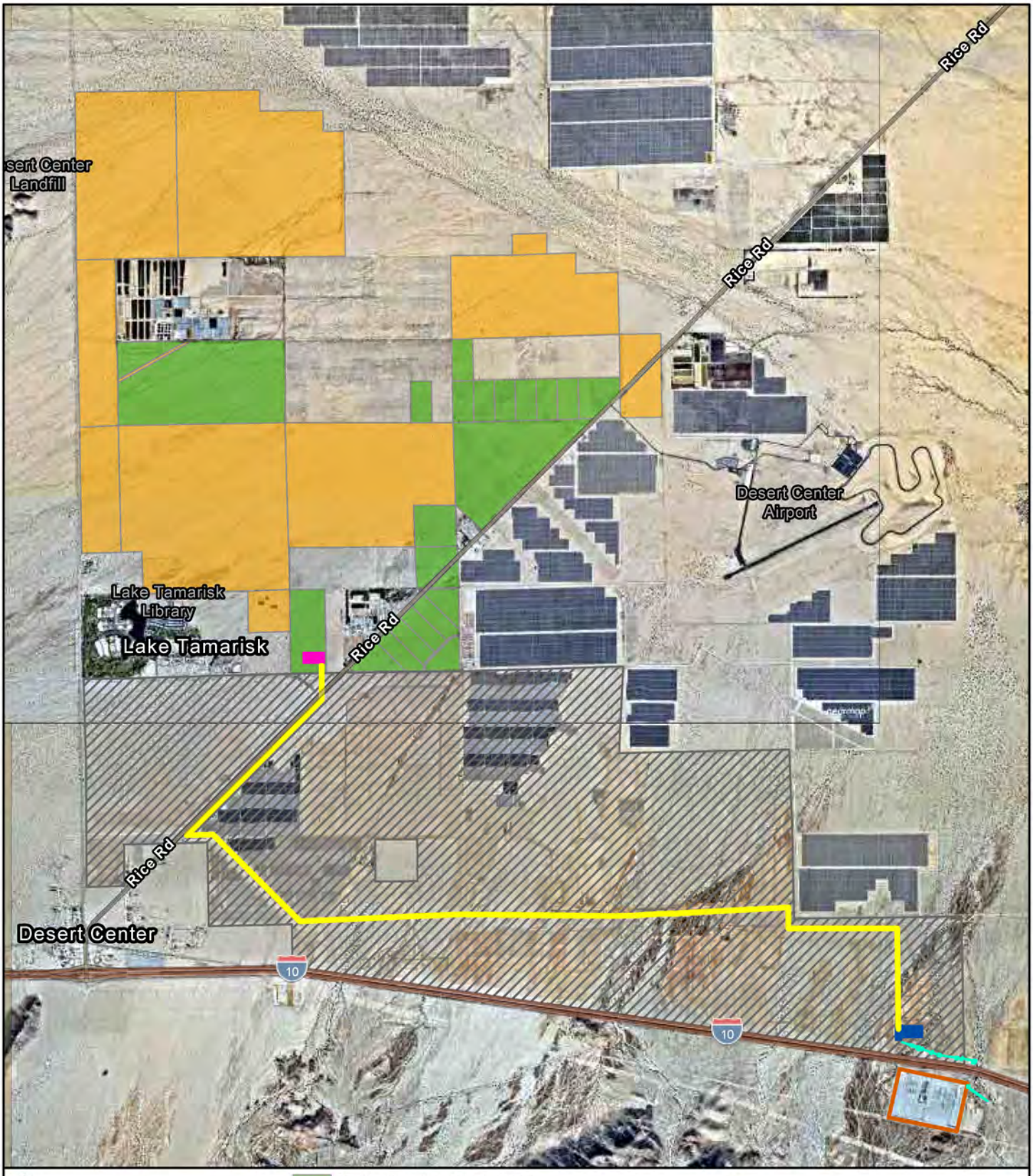



**Figure 1-2**
**Project Area**

Sources: BLM, 2022; Esri, 2023; Intersect Power, 2023; NearMap, 2023.

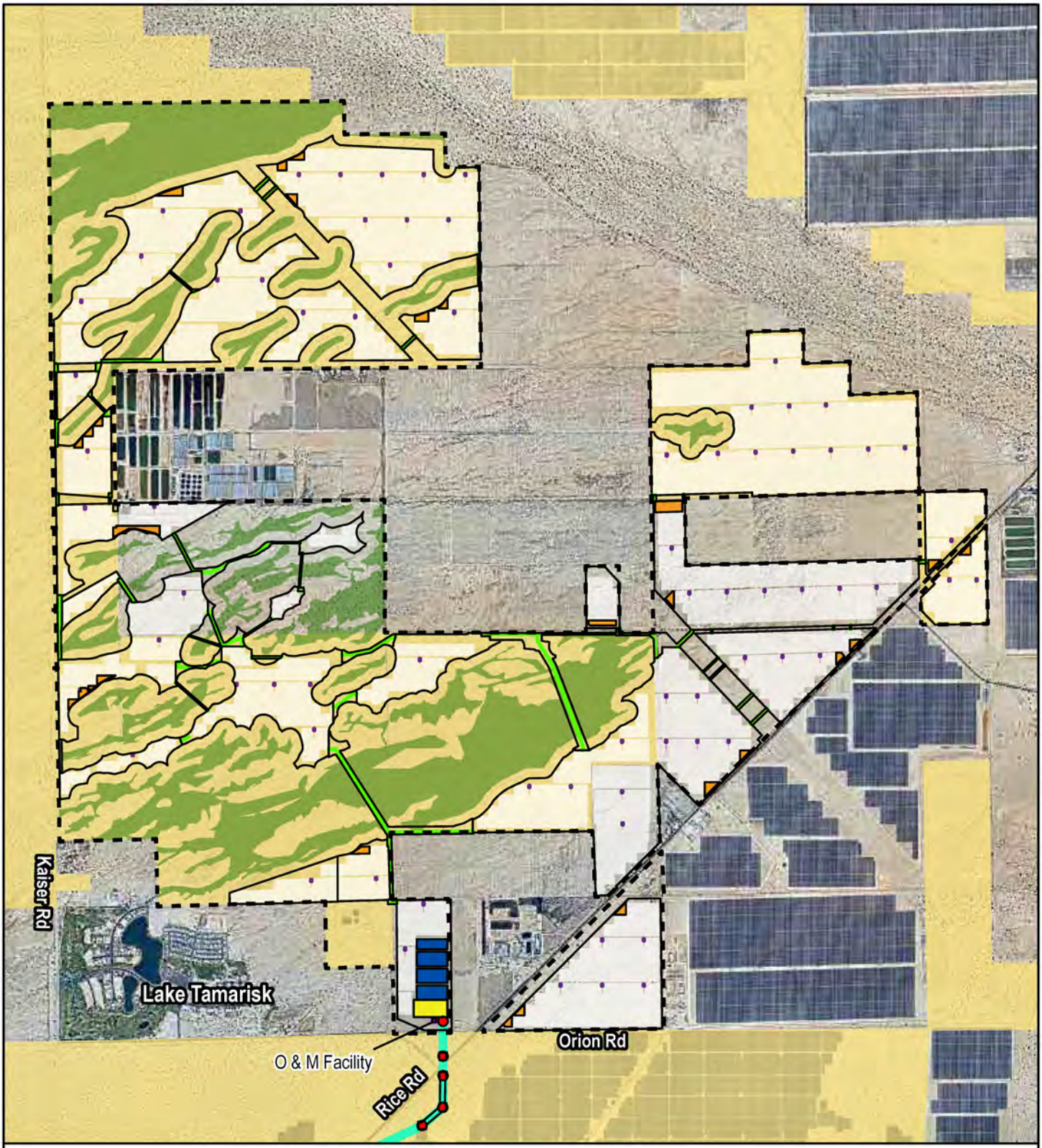



**Figure 1-3**

**Alternative 2: Proposed Project**

Sources: Aspen, 2024; Intersect Power, 2024; Nearmap, 2024.

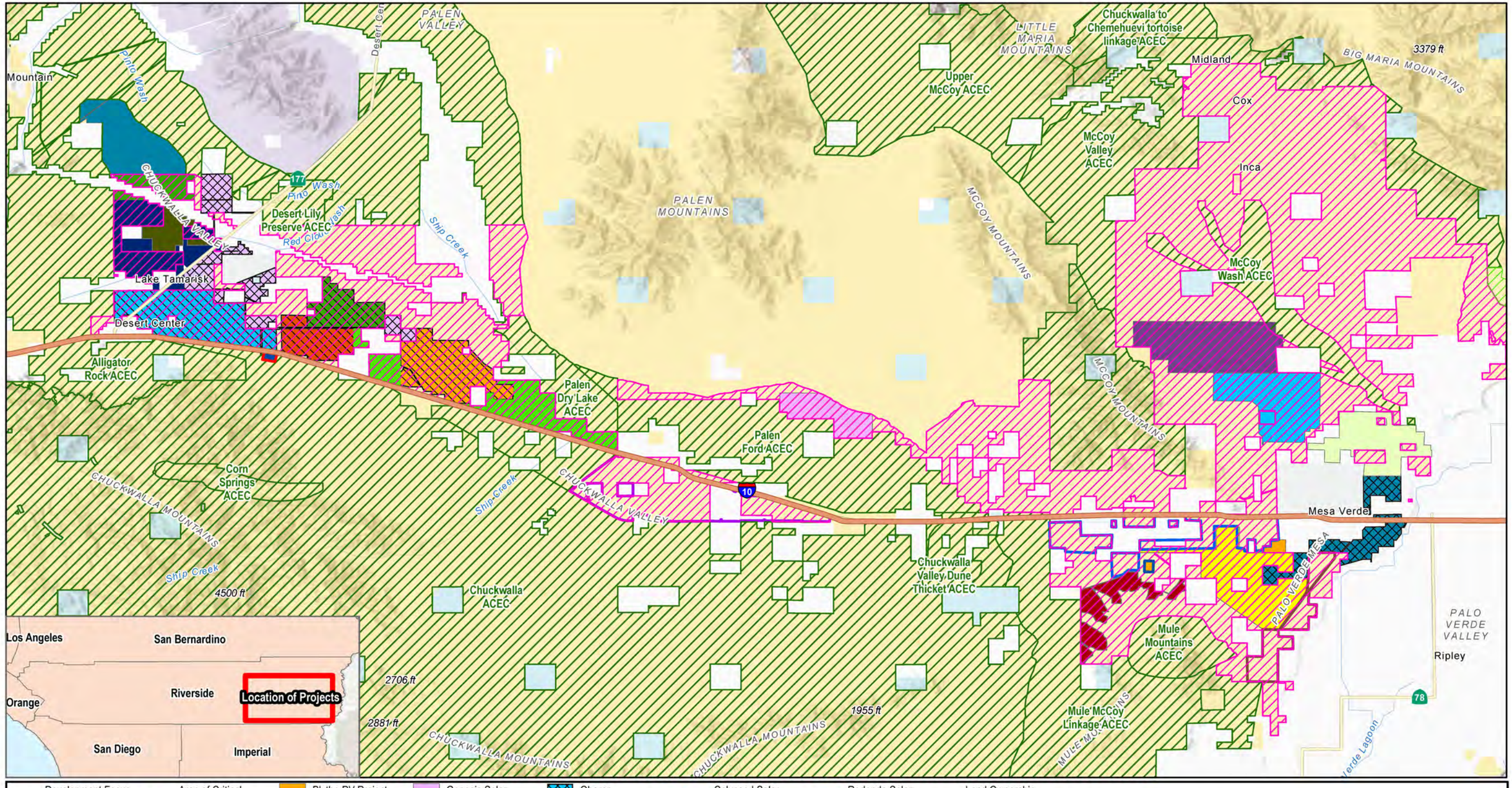
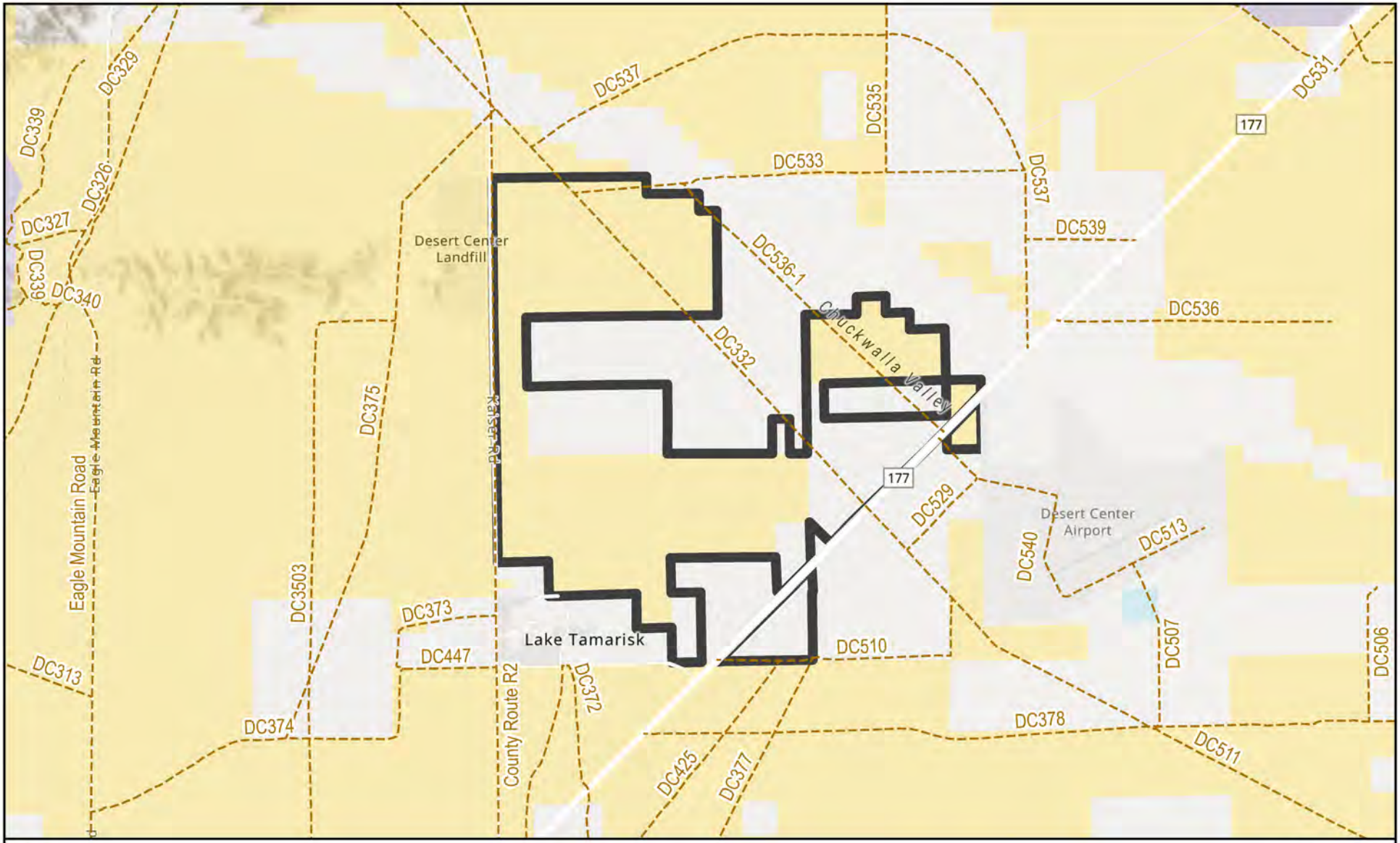



**Figure 1-4**
**Desert Center Solar Projects & DRECP Context**

Sources: Aspen, 2022; BLM, 2022; Esri, 2022; Intersect Power, 2022.




BLM Open OHV Routes

Easley Renewable Energy Project Boundary

Bureau of Land Management

CA State Lands Commission

Joshua Tree National Park

Scale: 1:63,360

1 inch = 1 mile

1 0 1 miles

**Figure 1-5**

**OHV Routes Within Project Boundary**

Sources: Aspen, 2024; BLM, 2021, 2024; Esri, 2024.

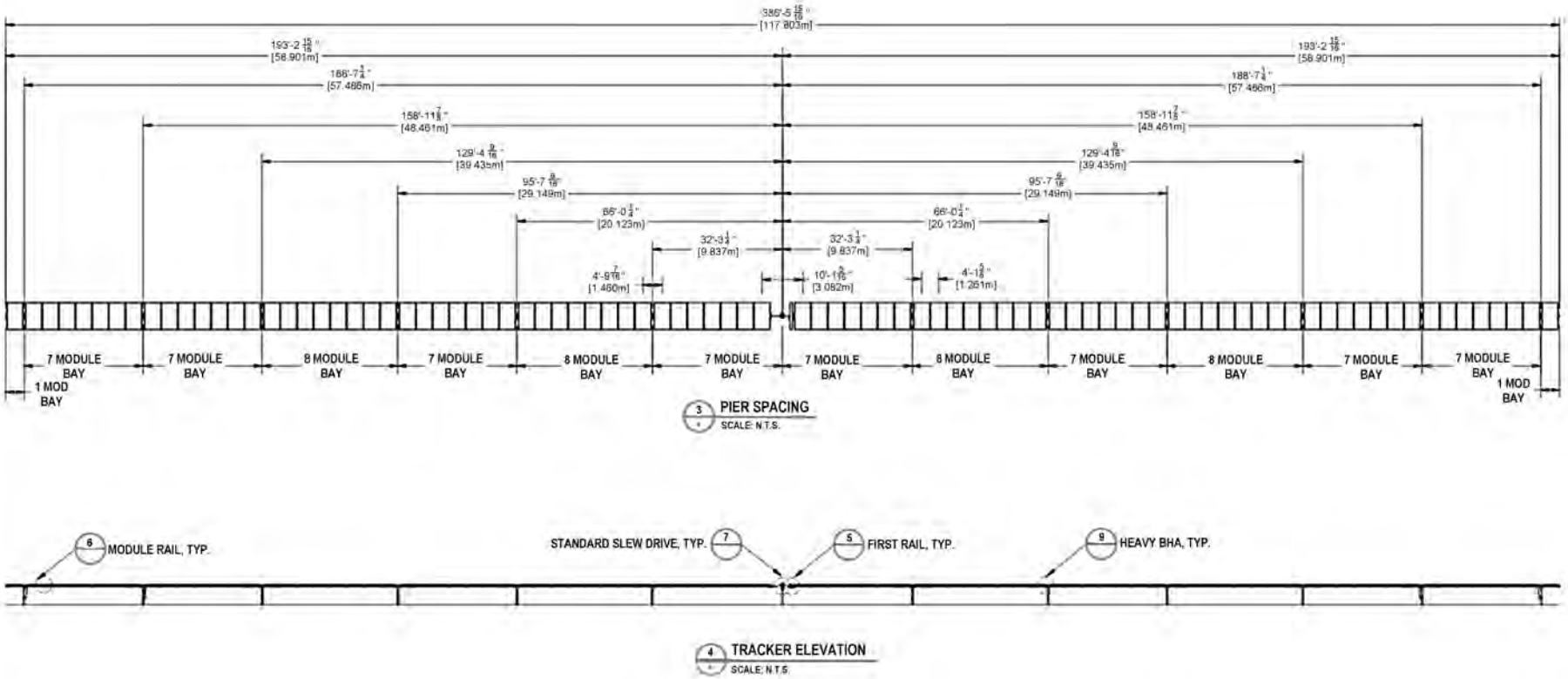



**Figure 2-1**

**Typical Single Axis Tracker with Portrait Module Orientation**

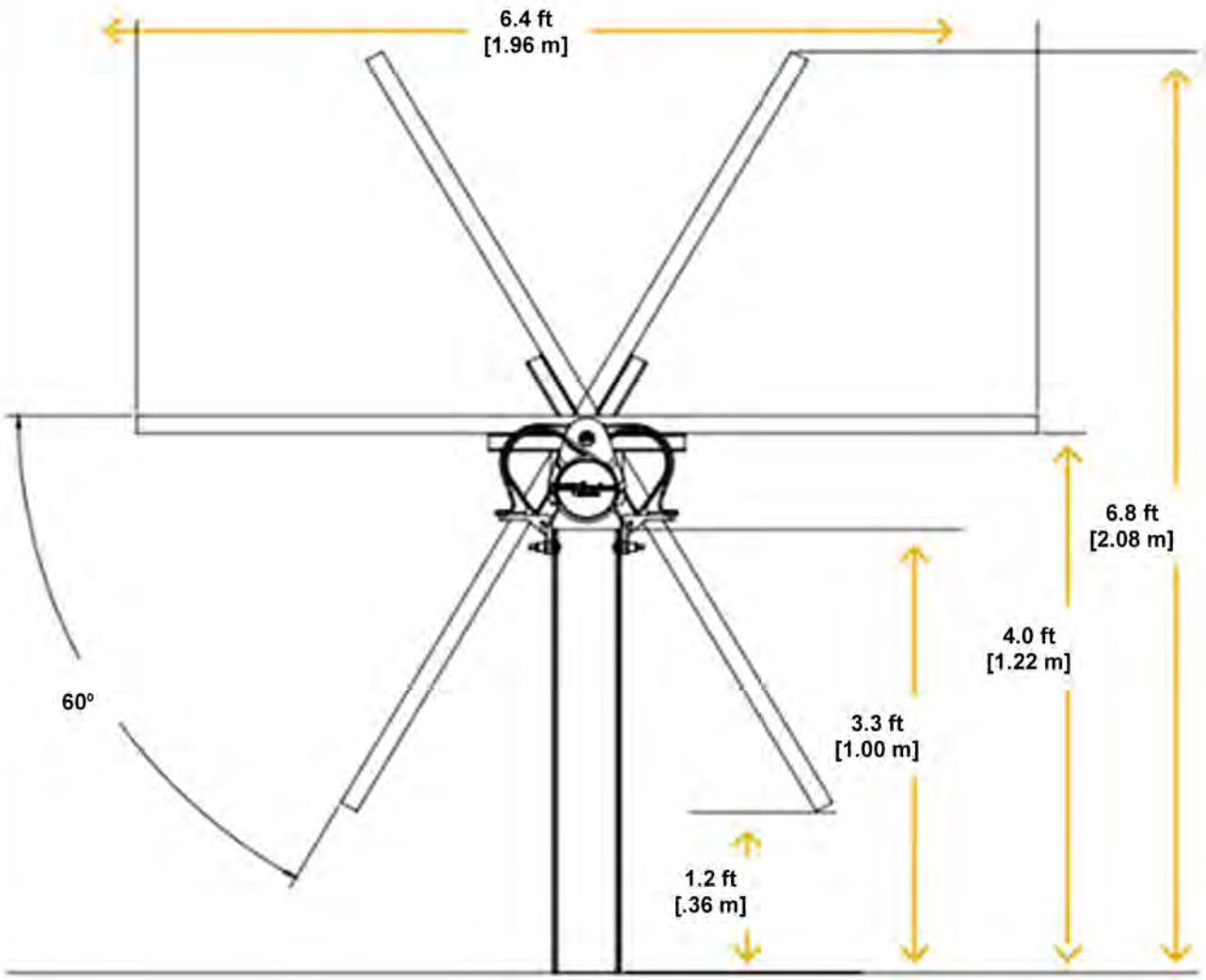



**Figure 2-2**
**Typical Tracker Structure**

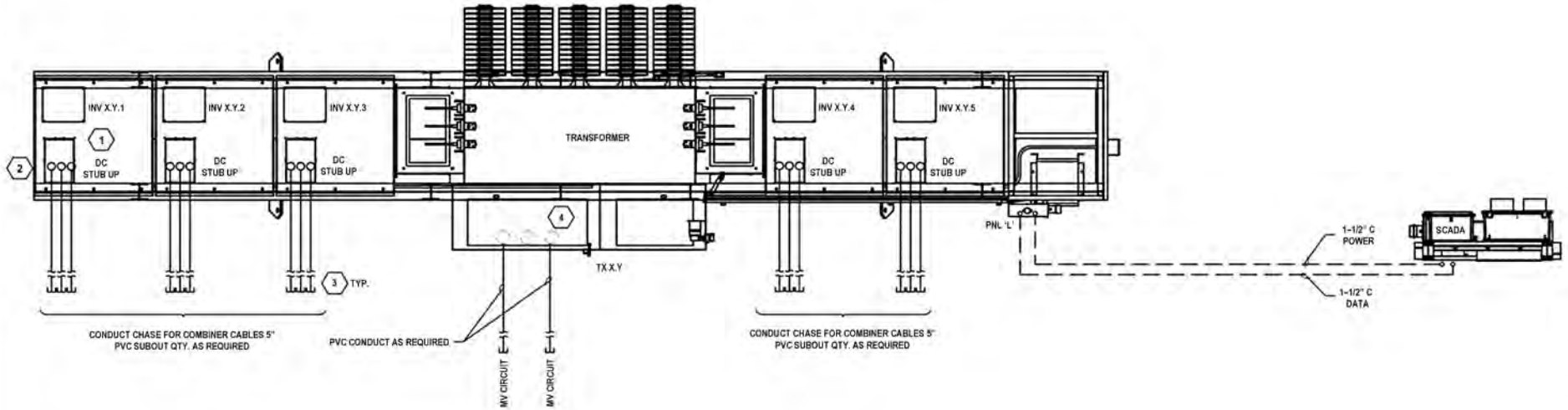
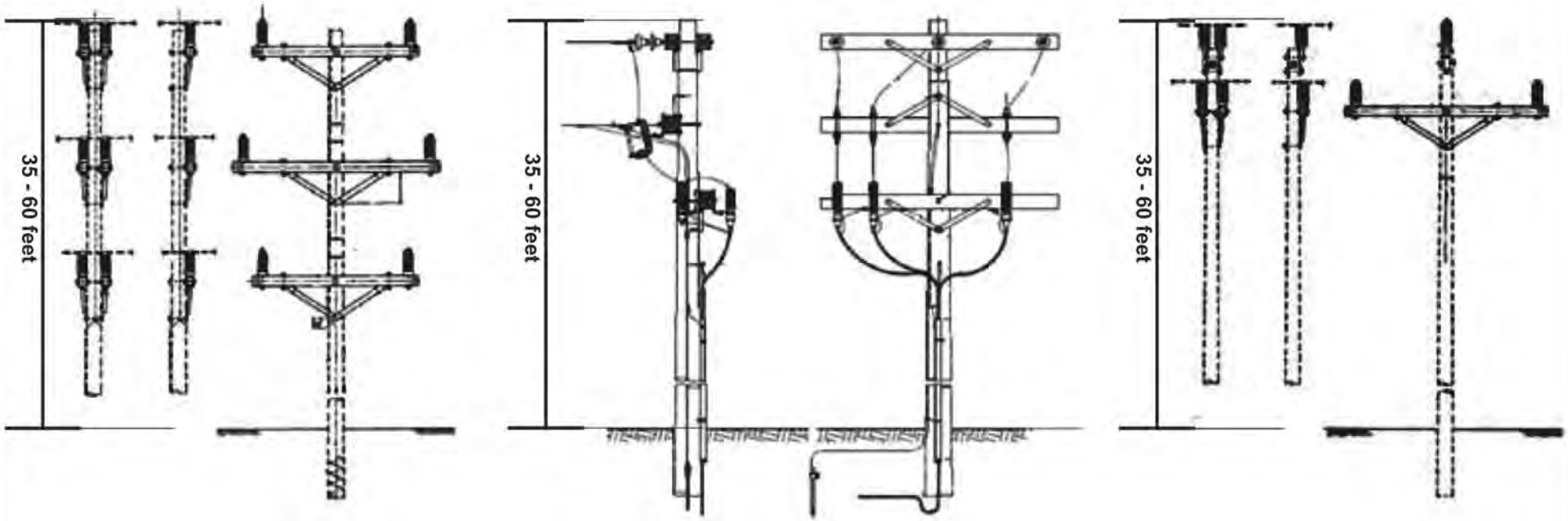



**Figure 2-3**
**Typical Inverter Skid Layout**



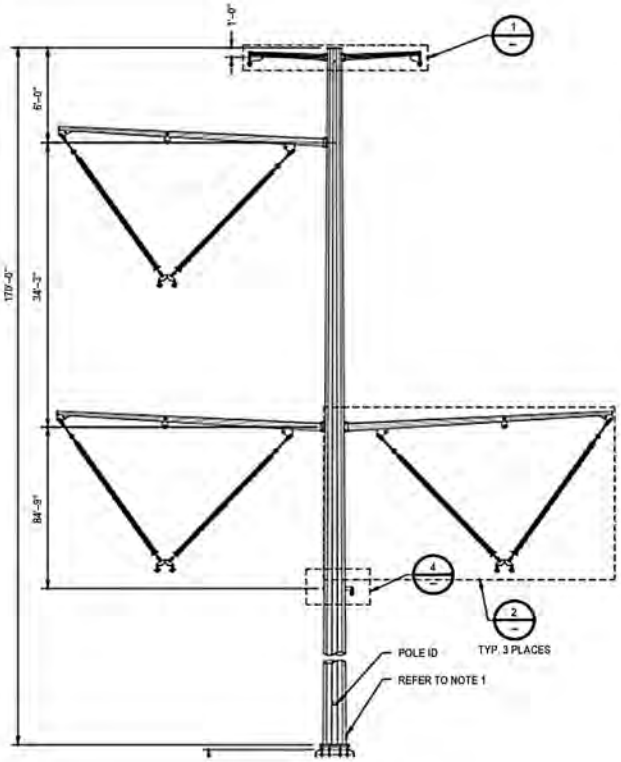

Double Circuit 34.5 kV
Overhead Line Wood Pole

Riser Wood Pole

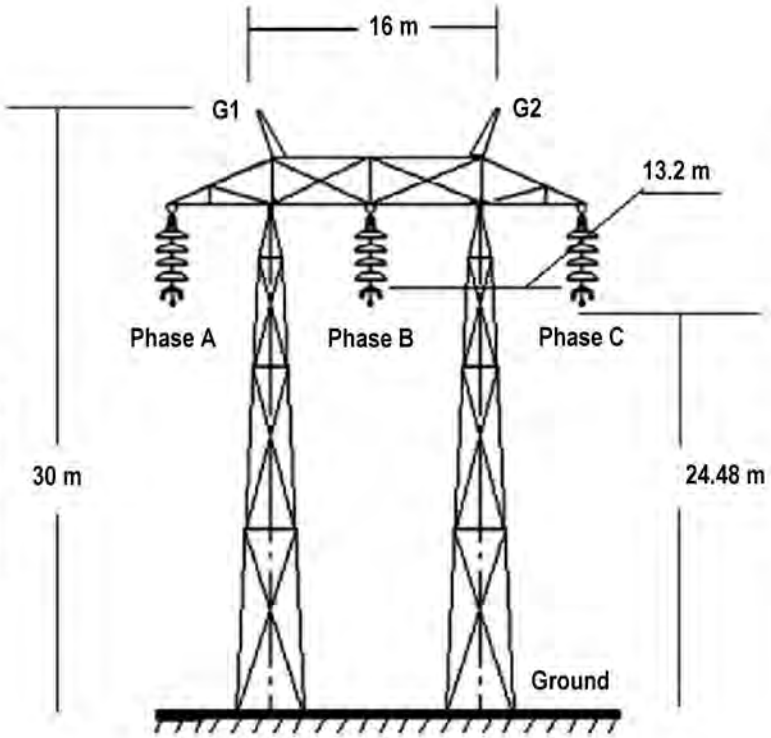
Single Circuit 34.5 kV
Overhead Line Wood Pole

**Figure 2-4**
**Typical 34.5 kV Medium Voltage Line Structures**

**Typical Monopole Structure**




**Typical Steel H-frame Structure**




**Typical Waist-type Lattice Structure**

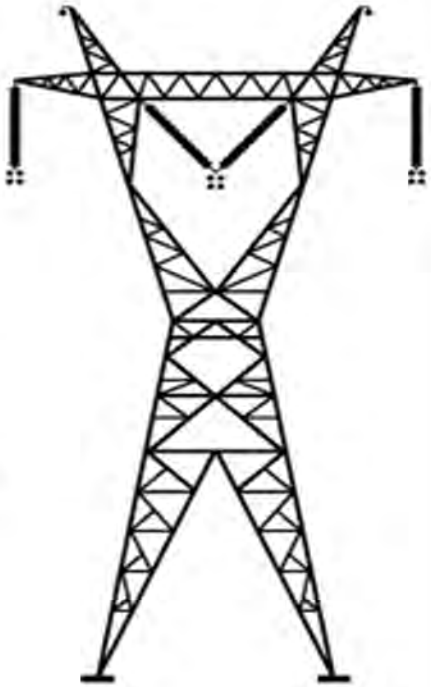


**Figure 2-5**
**Typical Structure for 500 kV Gen-tie**

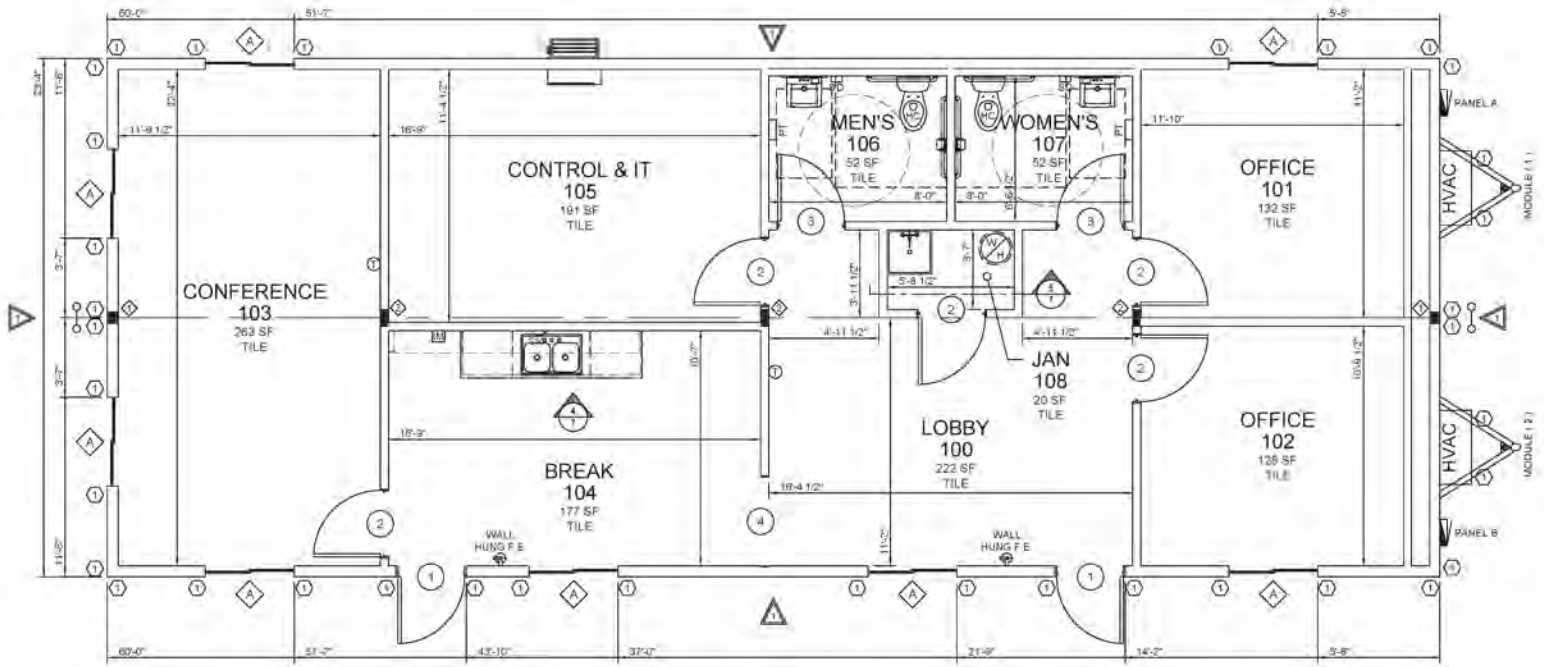



**Figure 2-6**
**Typical O&M Building Floor Plan**

**Figure 2-7**
**Typical BESS Enclosure**

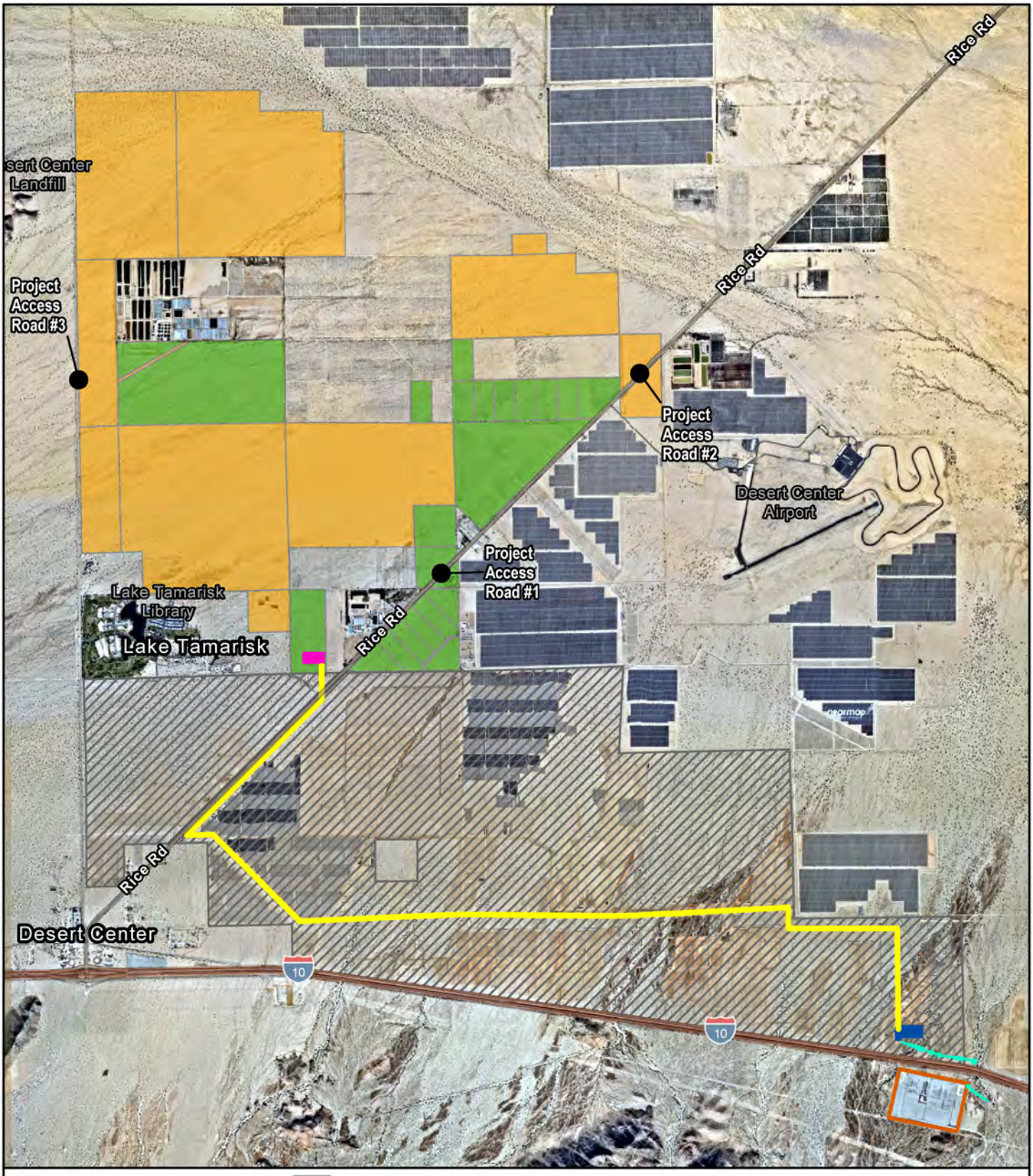
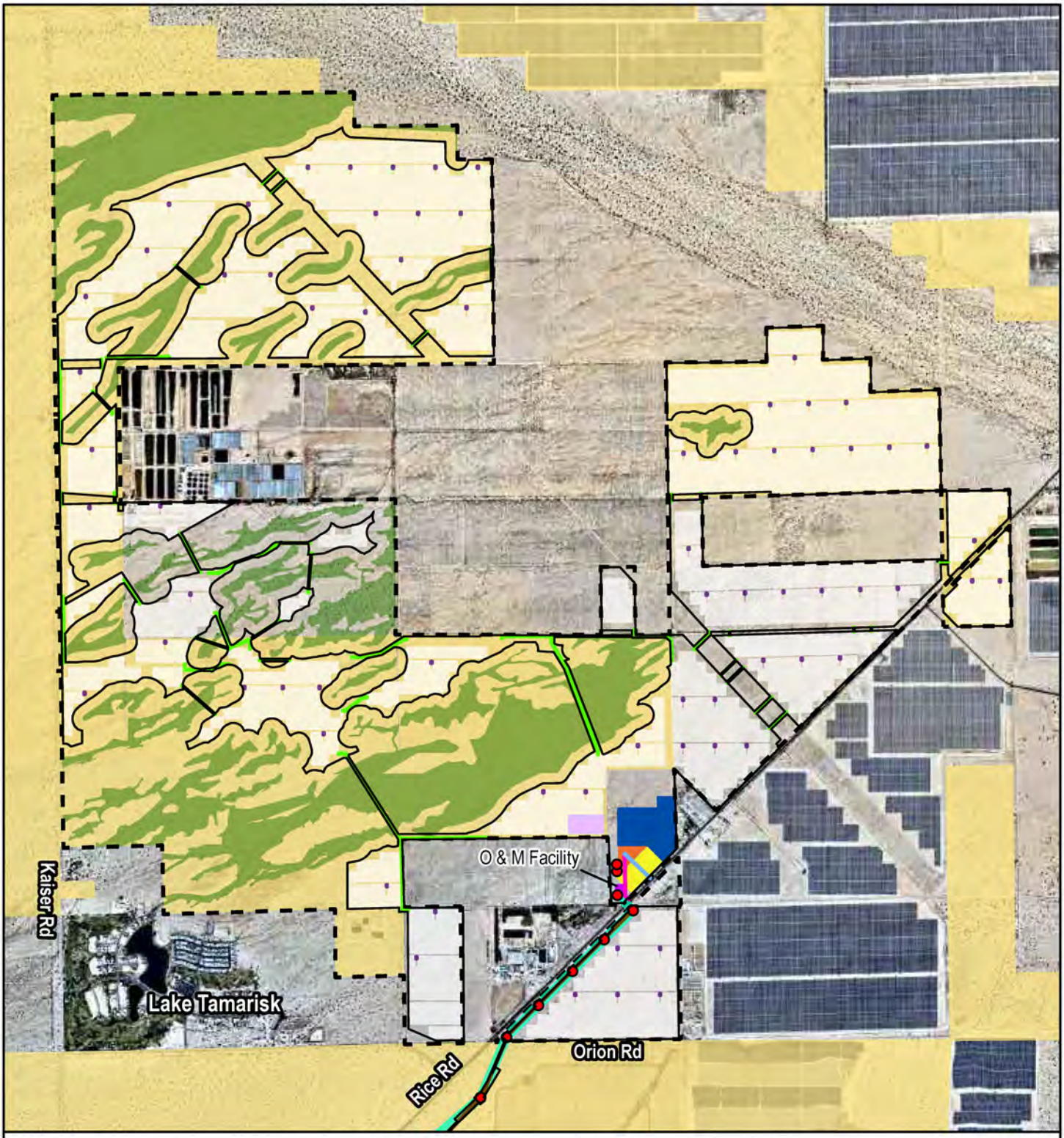



**Figure 2-8**
**Easley Project Roads and Access**

Sources: BLM, 2022; Esri, 2023; Intersect Power, 2023; NearMap, 2023.




N

Easley Renewable Energy Project Boundary
Laydown Yard
Limit of Disturbance
Solar Panel Array
Power Conversion Station (Inverter)
Substation
Substation Option 2
BESS

500 kV Gen-Tie Line ROW
Gen-Tie Poles
Access Road and/or 34.5 kV Collector Line
Gen-Tie Access Road
O & M Facility
12 kV Distribution Line Option 1
12 kV Distribution Line Option 2
Bureau of Land Management
Desert Dry Wash Woodland

0 0.5 1 Miles

**Figure 2-9**

**Alternative 3: Reduced Acreage Alternative**

Sources: Aspen, 2024; Intersect Power, 2024; Nearmap, 2024.

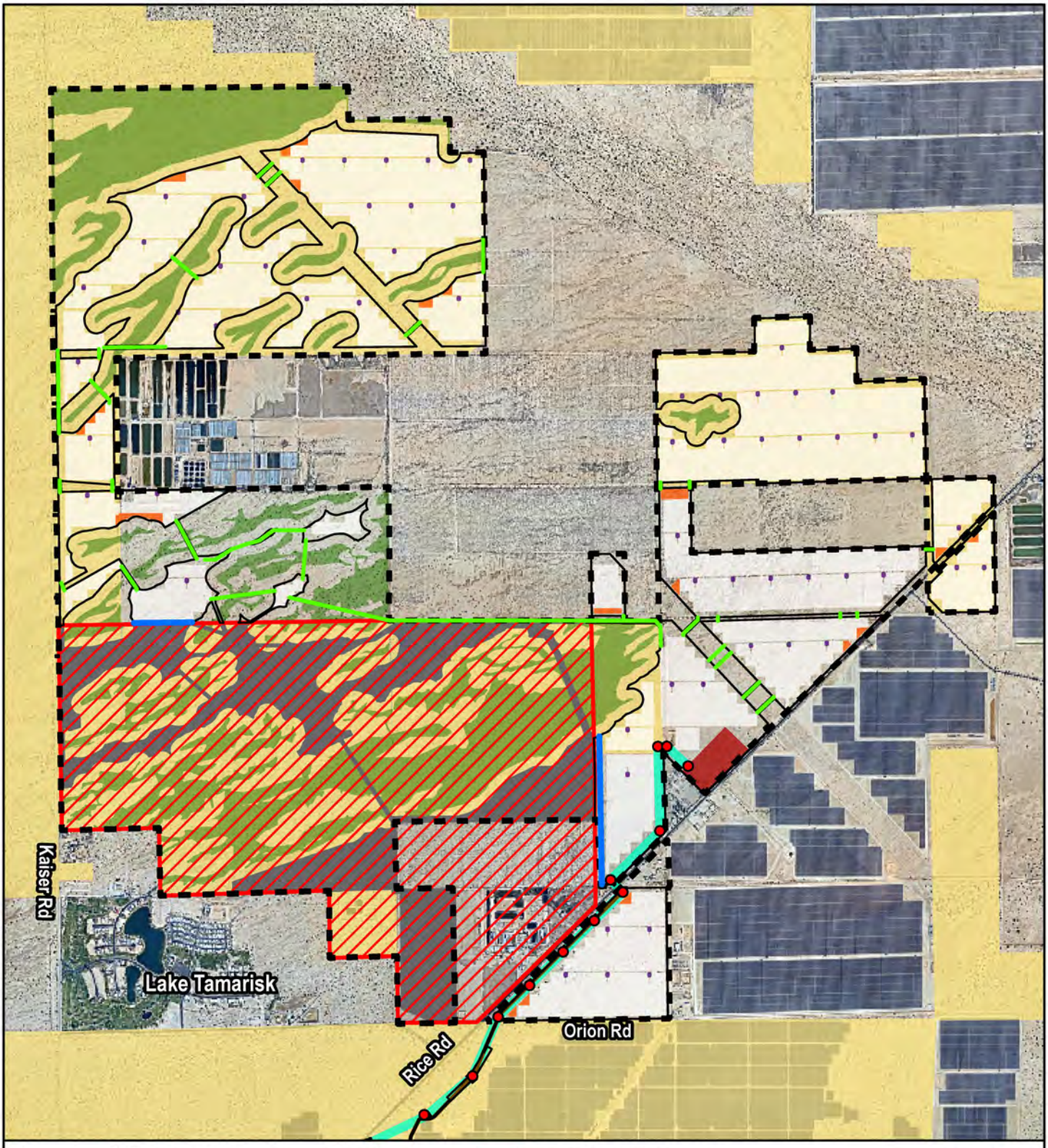
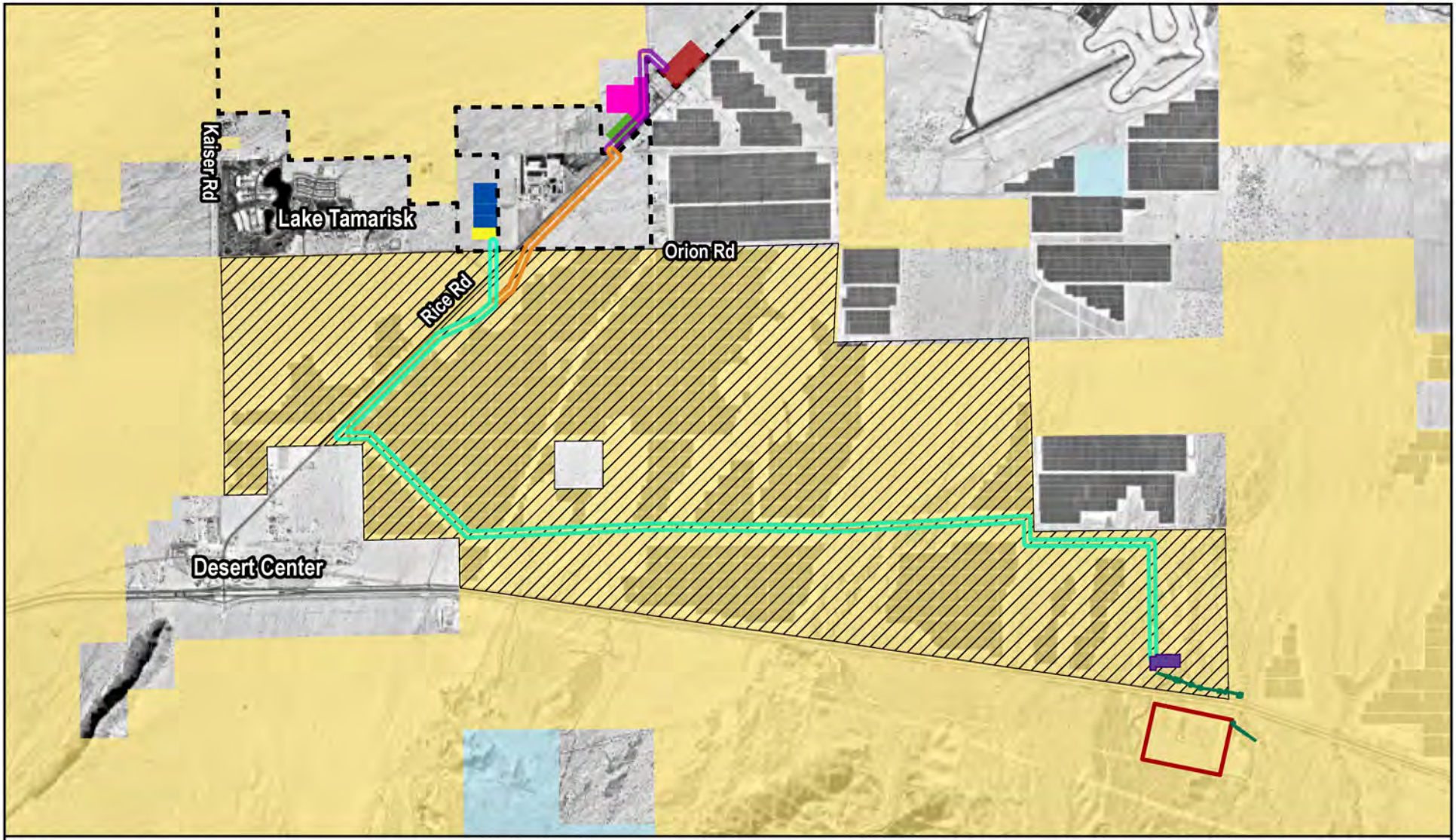



**Figure 2-10**

**Easley Renewable Energy Project**

**Alternative 4 Community Buffer**

Sources: Aspen, 2024; Intersect Power, 2024; Nearmap, 2024.




Easley Renewable Energy Project Boundary
Alternative 2 500 kV Gen-Tie Line ROW
Alternative 2 BESS
Alternative 2 Substation
Alternative 3 500 kV Gen-Tie Line ROW
Alternative 3 BESS
Alternative 3 Substation
Alternative 4 500 kV Gen-Tie Line ROW
Alternative 4 Substation/BESS/O & M Facility
Oberon Renewable Energy Project Boundary
Oberon Gen-Tie
Oberon Substation
Redbluff Substation
Bureau of Land Management
CA State Lands Commission

Scale: 1:48,000
1 inch = 4,000 feet
4,000 0 4,000 feet

**Figure 2-11**

**Easley Renewable Energy Project**

**500 kV Gen-Tie Alternatives**

Sources: Aspen, 2024; Intersect Power, 2022 & 2024; Nearmap, 2024.

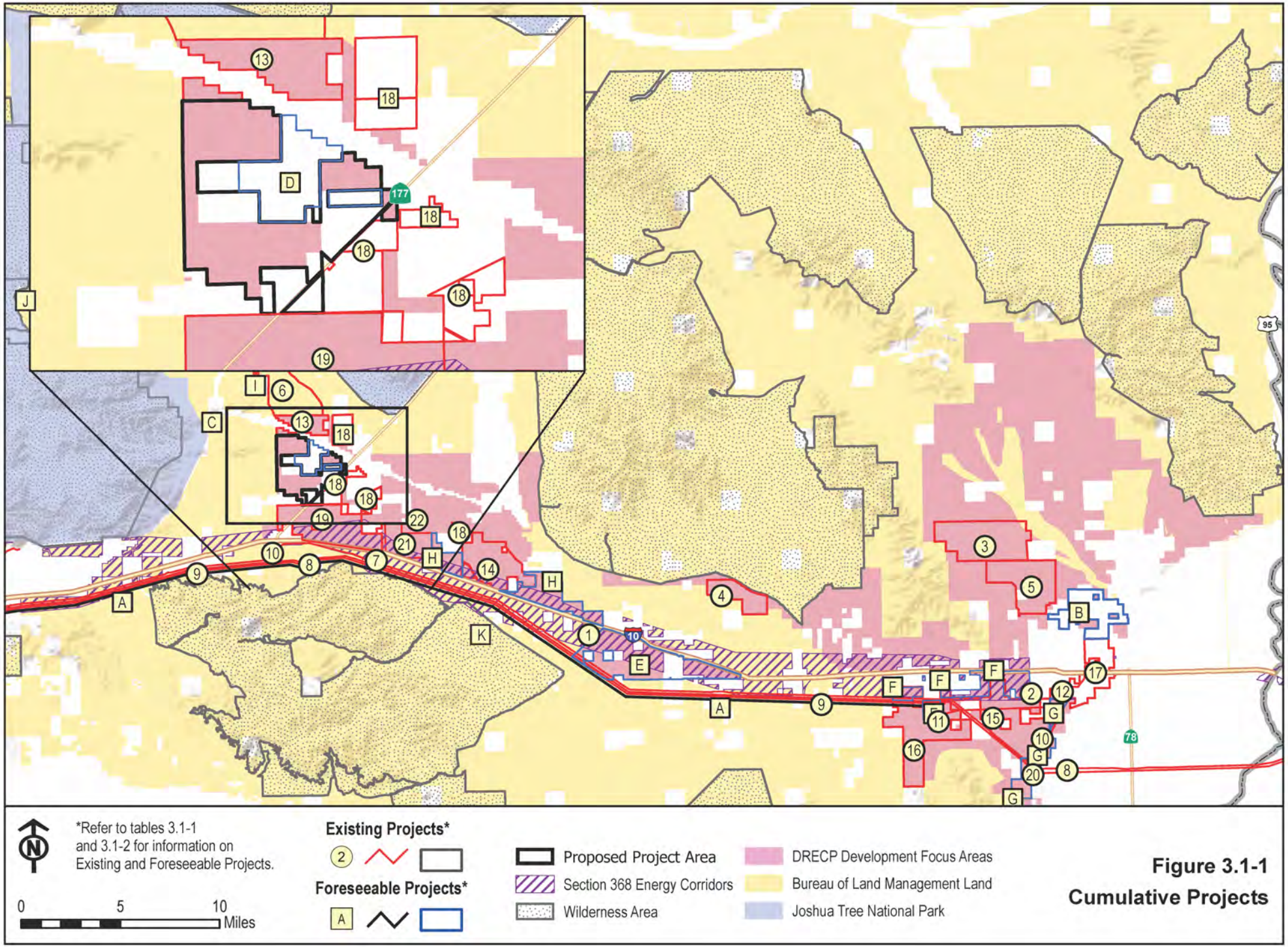



**Figure 3.1-1**
**Cumulative Projects**

# Figure 3.2-1 Air Quality Calculations

| **Alternative 2** | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Calendar Year** | **VOC** | **NOx** | **CO** | **SOx** | **PM10** | **PM2.5** | **CO2e/yr** |
| Maximum Annual Emissions, without Mitigation | 2.87 | 17.84 | 27.19 | 0.08 | 25.15 | 3.95 | 17056 |
| Maximum Annual Emissions, Mitigated | 1.73 | 9.25 | 28.43 | 0.08 | 6.99 | 1.65 | |
| **Alternative 3** | | | | | | | |
| **Calendar Year** | **VOC** | **NOx** | **CO** | **SOx** | **PM10** | **PM2.5** | **CO2e/yr** |
| Maximum Annual Emissions, without Mitigation | 2.38 | 14.81 | 22.57 | 0.07 | 20.87 | 3.28 | 14156 |
| Maximum Annual Emissions, Mitigated | 1.44 | 7.68 | 23.60 | 0.07 | 5.80 | 1.37 | |
| **Alternative 4** | | | | | | | |
| **Calendar Year** | **VOC** | **NOx** | **CO** | **SOx** | **PM10** | **PM2.5** | **CO2e/yr** |
| Maximum Annual Emissions, without Mitigation | 2.10 | 13.02 | 19.85 | 0.06 | 18.36 | 2.88 | 12451 |
| Maximum Annual Emissions, Mitigated | 1.26 | 6.75 | 20.75 | 0.06 | 5.10 | 1.20 | |

Source: Table 7 in POD Appendix S.

**Construction Phase - Activity by Year**

**Construction: Annual Emissions. Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM1 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total |
|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | |
| 2025 | 1.51 | 10.53 | 15.12 | 0.04 | 13.48 | 0.42 | 13.90 | 2.35 | 0.39 | 2.74 |
| 2026 | 2.50 | 17.71 | 26.72 | 0.08 | 24.42 | 0.72 | 25.14 | 3.27 | 0.68 | 3.94 |

**Construction: Annual Emissions. Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total |
|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | |
| 2025 | 0.81 | 4.37 | 16.21 | 0.04 | 4.39 | 0.07 | 4.47 | 1.15 | 0.07 | 1.22 |
| 2026 | 1.36 | 9.12 | 27.96 | 0.08 | 6.84 | 0.14 | 6.98 | 1.52 | 0.13 | 1.65 |

**Helicopter Activity during Construction: Add to CalEEMod Results**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total |
|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | |
| Helicopter Activity, Year 2 | 0.37 | 0.13 | 0.47 | | | 0.004 | 0.004 | | 0.004 | 0.004 |

| **Construction Phase - Overall Total, Duration of Construction** | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total |
|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | |
| **Maximum Annual without Mitigation** | **2.87** | **17.84** | **27.19** | **0.08** | **24.42** | **0.73** | **25.15** | **3.27** | **0.68** | **3.95** |
| **Maximum Annual with Mitigation** | **1.73** | **9.25** | **28.43** | **0.08** | **6.84** | **0.14** | **6.99** | **1.52** | **0.14** | **1.65** |

# Figure 3.3-1 Noise Calculations

**Citations**

General Assesessment: FTA, 2018: Transit Noise and Vibration Impact Assessment Guidelines. Section 7.1
Levels and Use Factors: FHWA, 2006: Roadway Construction Noise Model, User's Guide. Table 1 (Actual measured Lmax).

**Refc (ft)**
50

| Activity | Equipment | Lmax @ Refc | Acoustic Use Factor | Refc Leq(h) | Receptor (ft) | Leq at Receptor Leq (dBA) | | Composite at Receptor Leq (dBA) |
|---|---|---|---|---|---|---|---|---|
| **PV Panel System Installation** | | | | | | | Composite | 51 |
| | Mounted Impact Hammer (FHWA, 2006) | 90 | 20 | 83 | 2350 | 50 | 9.1E+04 | |
| | Crane | 81 | 20 | 74 | 2350 | 41 | 1.1E+04 | |
| | Backhoe or Loader | 79 | 40 | 75 | 2350 | 42 | 1.4E+04 | |
| | Dump Truck | 76 | 40 | 72 | 2350 | 39 | 7.2E+03 | |
| **Site Preparation** | | | | | | | Composite | 50 |
| | Grader | 85 | 40 | 81 | 2350 | 48 | 5.7E+04 | |
| | Dozer | 82 | 40 | 78 | 2350 | 45 | 2.9E+04 | |
| | Backhoe or Loader | 79 | 40 | 75 | 2350 | 42 | 1.4E+04 | |
| | Dump Truck | 76 | 40 | 72 | 2350 | 39 | 7.2E+03 | |
| | | | | | | | Composite | 50 |
| **Electrical System Installation** | Crane | 81 | 20 | 74 | 2350 | 41 | 1.1E+04 | |
| | Drill rig, auger | 84 | 20 | 77 | 2350 | 44 | 2.3E+04 | |
| | Concrete Mixer Truck | 79 | 40 | 75 | 2350 | 42 | 1.4E+04 | |
| | Compactor | 83 | 20 | 76 | 2350 | 43 | 1.8E+04 | |
| | Generator | 81 | 50 | 78 | 2350 | 45 | 2.8E+04 | |

| Helicopter | | Lmax @ Refc | Acoustic Use Factor | Refc Leq(h) | Receptor (ft) | Leq at Receptor Leq (dBA) |
|---|---|---|---|---|---|---|
| | Kmax (92 dBA contour @ 100 feet) | 98 | 25 | 92 | 2350 | 59 |
| | Vertol 107 (92 dBA contour @ 450 feet) | 111 | 25 | 105 | 2350 | 72 |

Ref: USFS Sound Measurements Toolkit. https://www.fs.usda.gov/t-d/programs/im/sound_measure/helo_conclusions.shtml.

**Refc (ft)**
50

| Activity | Equipment | Lmax @ Refc | Acoustic Use Factor | Refc Leq(h) | Receptor (ft) | Leq at Receptor Leq (dBA) | | Composite at Receptor Leq (dBA) |
|---|---|---|---|---|---|---|---|---|
| **PV Panel System Installation** | | | | | | | Composite | 45 |
| | Mounted Impact Hammer (FHWA, 2006) | 90 | 20 | 83 | 4641 | 44 | 2.3E+04 | |
| | Crane | 81 | 20 | 74 | 4641 | 35 | 2.9E+03 | |
| | Backhoe or Loader | 79 | 40 | 75 | 4641 | 36 | 3.7E+03 | |
| | Dump Truck | 76 | 40 | 72 | 4641 | 33 | 1.8E+03 | |
| **Site Preparation** | | | | | | | Composite | 44 |
| | Grader | 85 | 40 | 81 | 4641 | 42 | 1.5E+04 | |
| | Dozer | 82 | 40 | 78 | 4641 | 39 | 7.4E+03 | |
| | Backhoe or Loader | 79 | 40 | 75 | 4641 | 36 | 3.7E+03 | |
| | Dump Truck | 76 | 40 | 72 | 4641 | 33 | 1.8E+03 | |
| | | | | | | | Composite | 44 |
| **Electrical System Installation** | Crane | 81 | 20 | 74 | 4641 | 35 | 2.9E+03 | |
| | Drill rig, auger | 84 | 20 | 77 | 4641 | 38 | 5.8E+03 | |
| | Concrete Mixer Truck | 79 | 40 | 75 | 4641 | 36 | 3.7E+03 | |
| | Compactor | 83 | 20 | 76 | 4641 | 37 | 4.6E+03 | |
| | Generator | 81 | 50 | 78 | 4641 | 39 | 7.3E+03 | |

| Helicopter | | Lmax @ Refc | Acoustic Use Factor | Refc Leq(h) | Receptor (ft) | Leq at Receptor Leq (dBA) |
|---|---|---|---|---|---|---|
| | Kmax (92 dBA contour @ 100 feet) | 98 | 25 | 92 | 4641 | 53 |
| | Vertol 107 (92 dBA contour @ 450 feet) | 111 | 25 | 105 | 4545 | 66 |

Ref: USFS Sound Measurements Toolkit. https://www.fs.usda.gov/t-d/programs/im/sound_measure/helo_conclusions.shtml.

**Figure 3.5-1. Vegetation Communities**

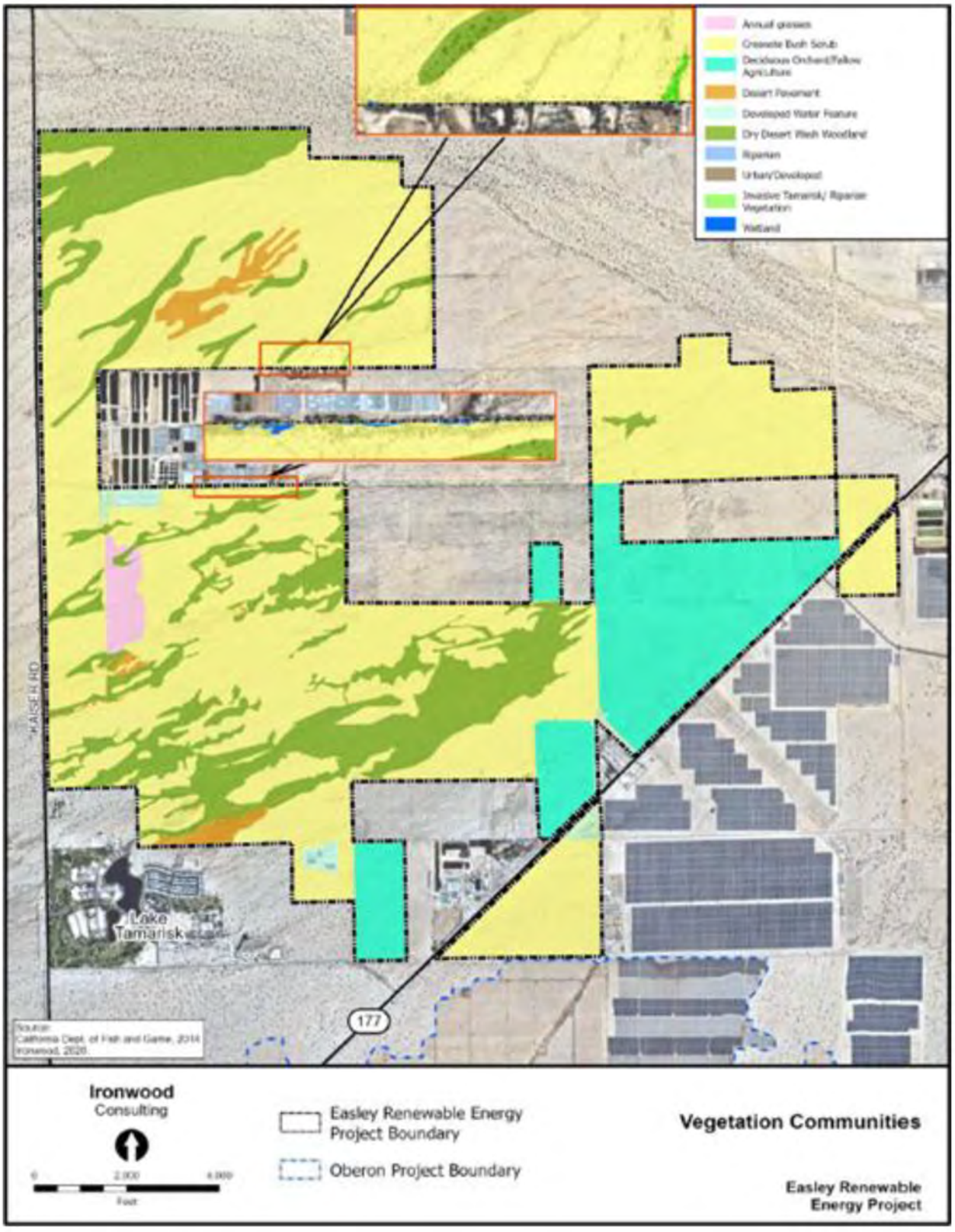
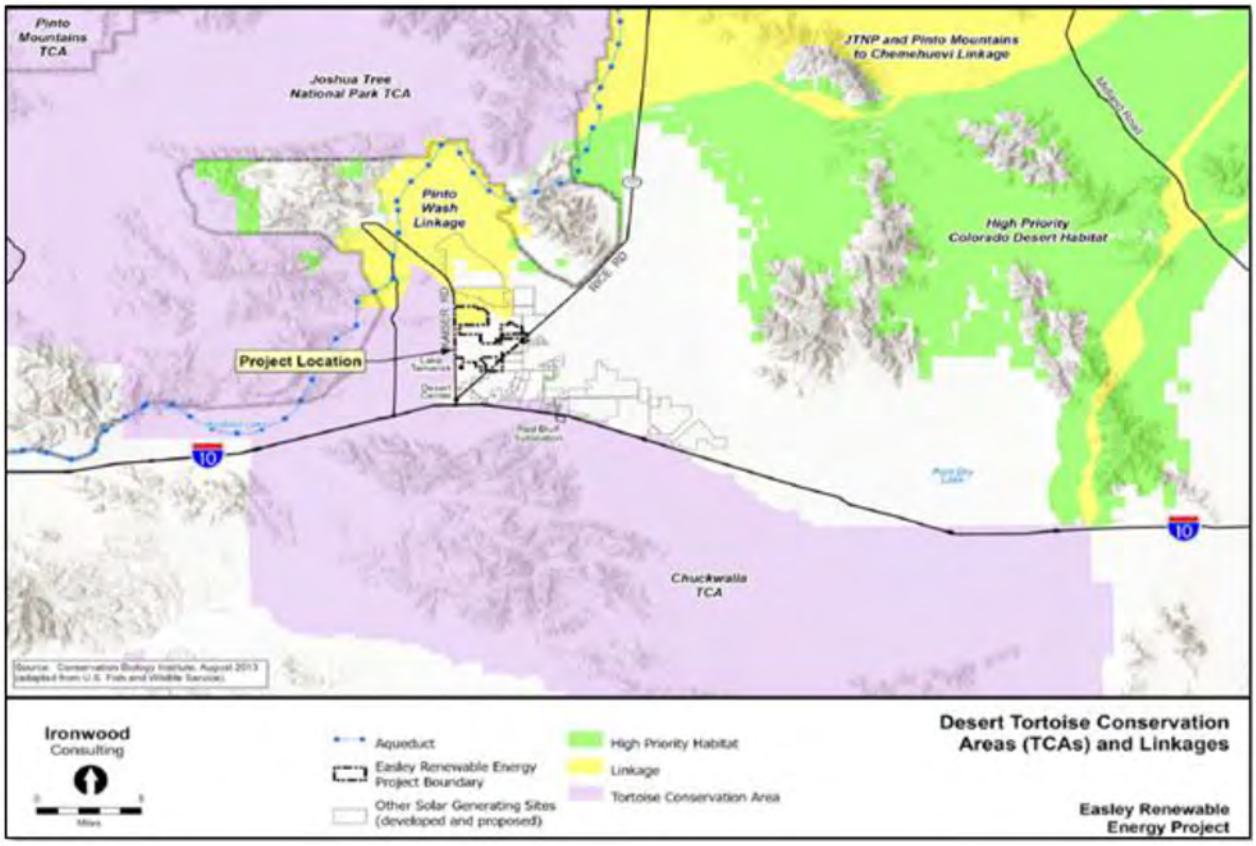


**Figure 3.5-2. Pinto Wash Linkage**



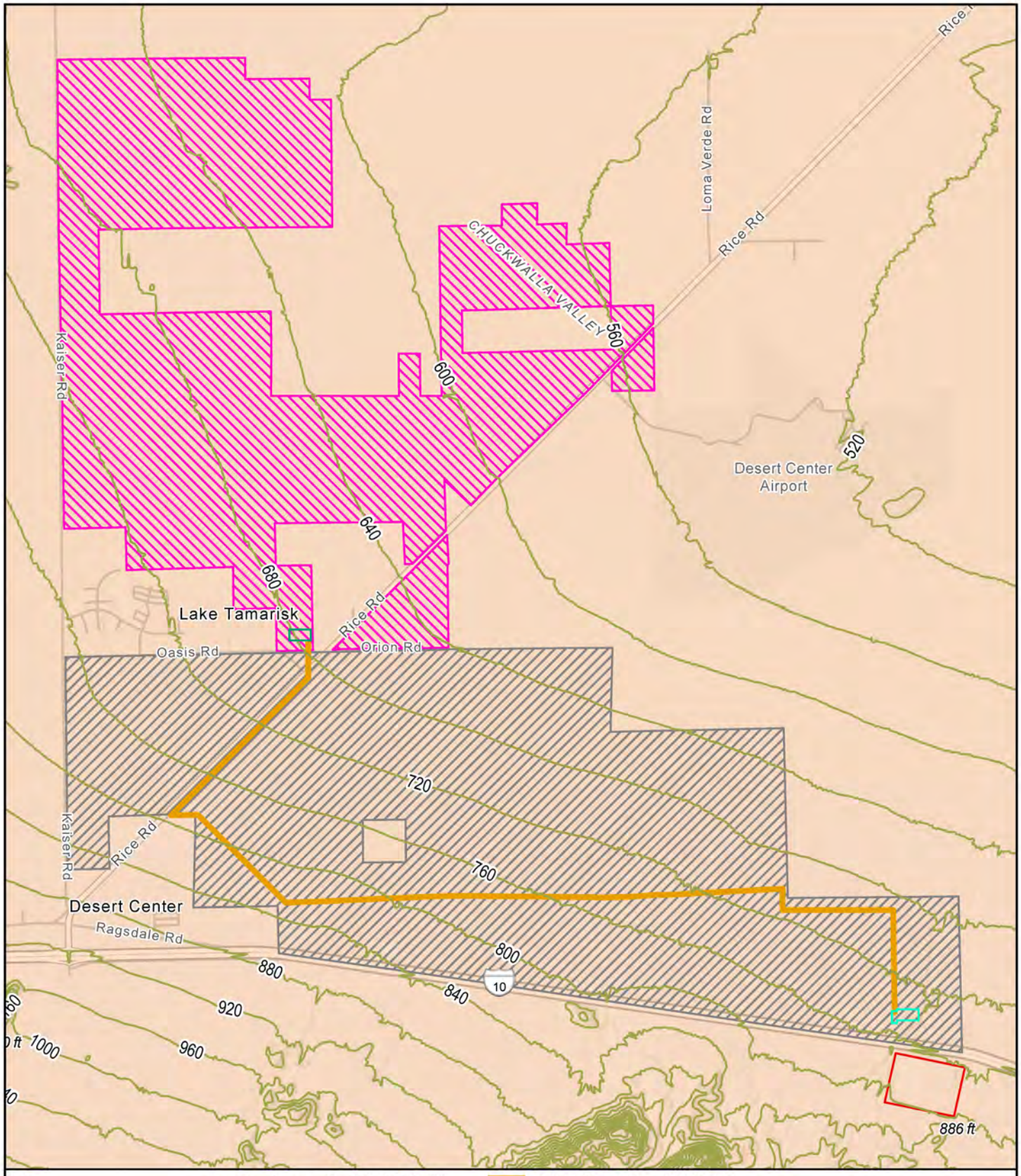



**Figure 3.7-1**
**Topography**

Sources: Esri, 2023; Intersect Power, 2023; USGS, 2022.

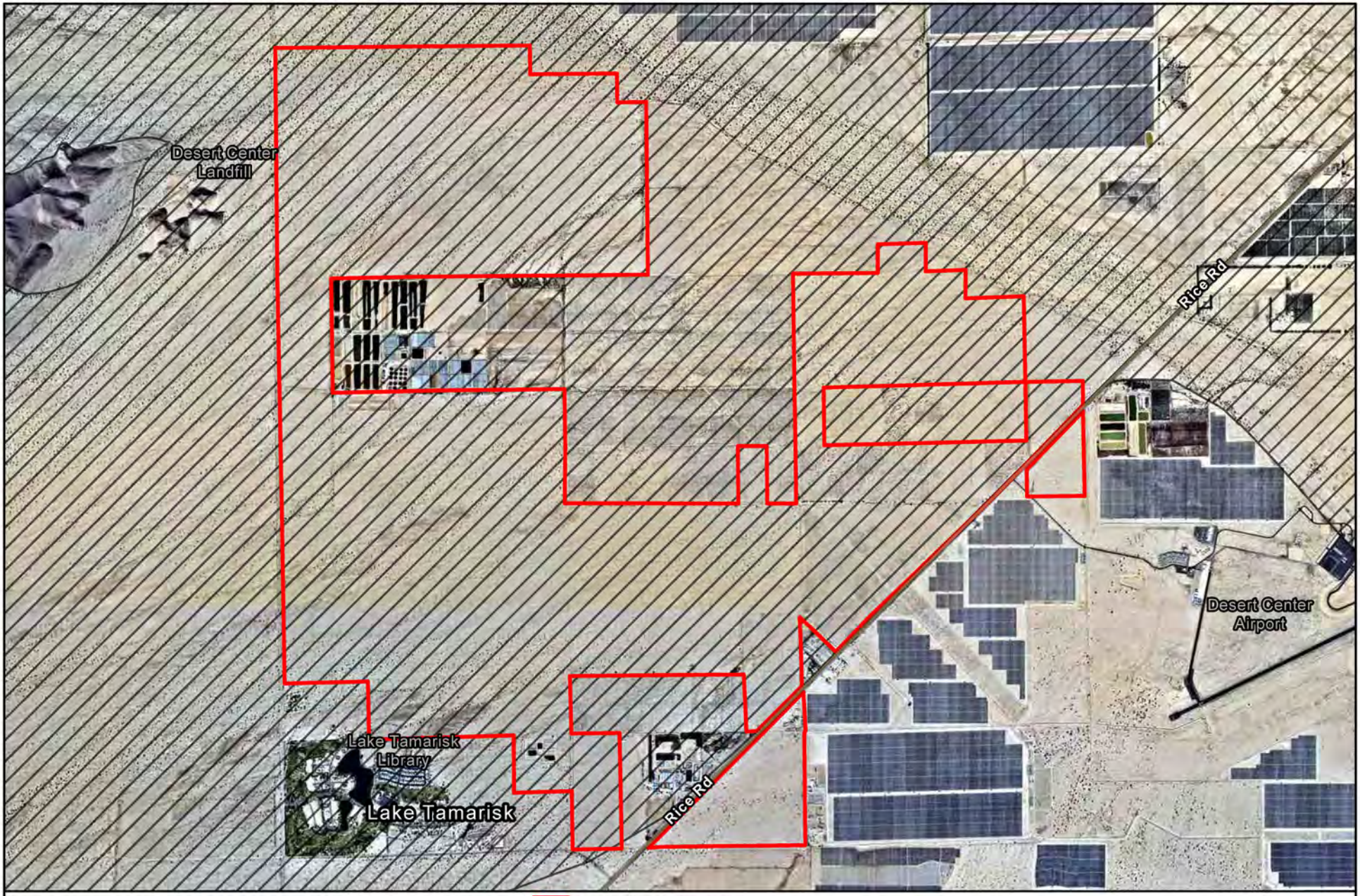



**Figure 3.7-2**
**DWR Flood Awareness Zone**

Sources: CA DWR, 2023, Esri, 2023 Intersect Power, 2023; NearMap, 2023.

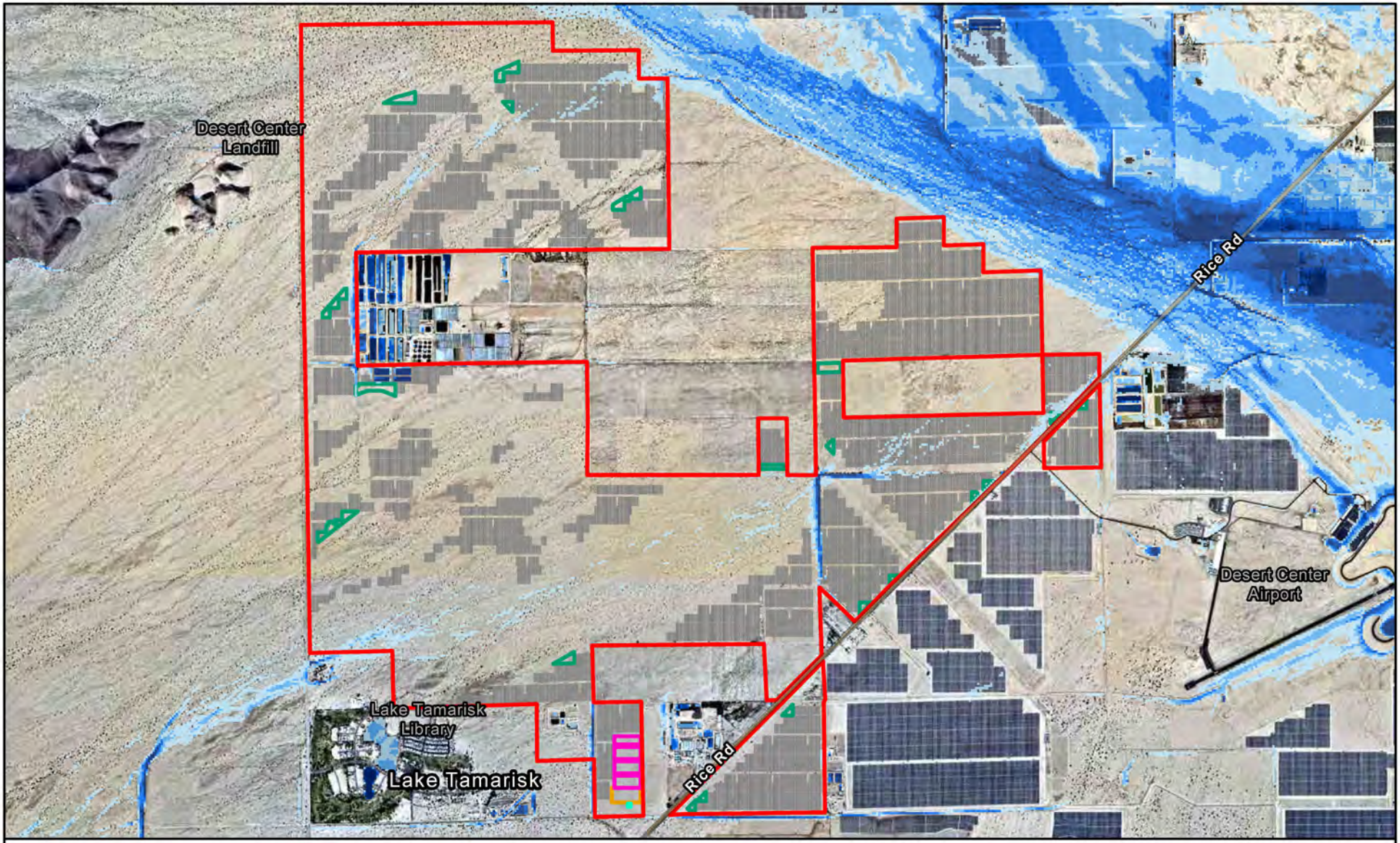



**Figure 3.7-3**
**100-Year Maximum Flood Depth**

Sources: Esri, 2023; Intersect Power, 2023.

# Appendix F

Appendix F-1: Mitigation Measures

Appendix F-2: Conservation and Management Actions

# APPENDIX F-1: MITIGATION MEASURES

## Air Quality and Greenhouse Gas Emissions

**MM AQ-1** **Fugitive Dust Control Plan.** The Project owner, its contractor, or its subcontractor shall prepare and implement a Fugitive Dust Control Plan to address fugitive dust emissions during Project construction, operation, maintenance, and decommissioning. The plan shall include measures to minimize fugitive dust emissions from the commencement of construction activities through operations, maintenance, and decommissioning. In the case where the contractor obtains permit coverage under SCAQMD Rule 403, that permit, and associated plan will be incorporated into the final Fugitive Dust Control Plan prepared by the Project owner. During construction, the Project owner, its contractor, and subcontractors shall take every reasonable precaution to prevent all airborne fugitive dust plumes from leaving the Project site, to prevent visible particulate matter from being deposited upon public roadways and shall adhere to the SCAQMD rules. The plan shall be subject to review and approval by the SCAQMD (Rule 403).

The following measures shall be included within the plan:

- Prior to commencing construction, the Project owner, its contractor, or its subcontractor shall designate and retain for the duration of construction a Dust Control Supervisor. The Dust Control Supervisor shall have successfully completed the SCAQMD Rule 403 dust control compliance training class. The Dust Control Supervisor shall have full access to all areas of construction on the Project site, gen-tie line, and other linear facilities and shall have the authority to stop any or all construction activities as warranted by applicable construction mitigation conditions
- During construction, all unpaved roads, disturbed areas (e.g., areas of scraping, excavation, backfilling, grading, and compacting), and loose materials generated during construction activities shall be stabilized with a non-toxic soil stabilizer or soil weighting agent or watered two times daily or as frequently as necessary to minimize fugitive dust generation. Non-water-based soil stabilizers shall be as efficient as or more efficient for fugitive dust control than ARB-approved soil stabilizers and shall not increase any other environmental impacts, including loss of vegetation, adverse odors, or emissions of ozone precursor reactive organic gases (ROG) or volatile organic compounds (VOC). The proposed soil stabilizing products shall be listed in the Plan and are subject to review and approval by Riverside County, BLM, and CDFW. Any soil stabilizers proposed shall be consistent with those recommended in the Stormwater Pollution Prevention Plan (SWPPP) and shall also be approved for use by the project's Restoration Specialist to ensure that the products would not impede restoration goals.
- The main access roads through the site shall be either paved or stabilized using soil binders, or equivalent methods, to provide a stabilized surface that is similar for the purposes of dust control to paving, that may or may not include a crushed rock (gravel or similar material with fines removed) top layer, prior to commencing construction. Delivery, laydown, and staging areas for construction or operations and maintenance supplies shall be paved or stabilized prior to taking initial deliveries.

- Grading and earthwork activities, including vegetation removal, cut and fill movement, and soil compacting, shall be phased across the site to minimize the amount of exposed or disturbed area on any single day.
- No vehicle shall exceed 15 miles per hour on unpaved areas within the site, with the exception that vehicles may travel up to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions or conflict with other permit conditions.
- Visible speed limit signs shall be posted at the construction site entrances.
- All construction equipment vehicle tires shall be inspected and washed as necessary to be cleaned free of dirt prior to entering paved roadways.
- All unpaved exits from the construction site shall be graveled or treated to prevent track-out onto public roadways. No person shall allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation. All track out from an active operation shall be removed immediately if it extends over 25 feet or if under 25 feet, at the end of each workday.
- All paved roads within the construction site shall be swept daily or as needed (less during periods of precipitation) on days when construction activity occurs to prevent the accumulation of dirt and debris.
- At least the first 500 feet of any paved public roadway exiting the construction site or exiting other unpaved roads to access the construction site or staging areas shall be swept as needed when dirt or runoff resulting from the construction activities is visible on the paved public roadway.
- Consistent with SCAQMD Rule 403(g)(2), regarding exemptions, contingency control measures may be implemented during "high wind" conditions, when instantaneous wind speeds exceed 25 miles per hour. The contingency measures for high wind events shall include: Cease all active operations; Stop all vehicular traffic; Apply water to soil not more than 15 minutes prior to moving such soil; Apply chemical stabilizers prior to wind event; and/or Apply water to all un-stabilized disturbed areas 3 times per day, unless there is evidence of wind driven fugitive dust, then increase watering frequency to a minimum of four times per day.

**MM AQ-2** **Control On-Site Off-Road Equipment Emissions.** The Project owner, when entering into construction contracts or when procuring off-road equipment or vehicles for on-site construction or O&M activities, shall ensure that only new model year equipment or vehicles are obtained. The following measures shall be included with contract or procurement specifications:

- All construction diesel engines not registered under California Air Resources Board's Statewide Portable Equipment Registration Program, with a rating of 50 hp or higher shall meet the Tier 4 California Emission Standards for Off-Road Compression-Ignition Engines, as specified in California Code of Regulations, Title 13, section 2423(b)(1).
- All diesel-fueled engines used in the construction of the facility shall have clearly visible tags showing that the engine meets the standards of this measure.

- All equipment and trucks used in the construction or O&M of the facility shall be properly maintained and the engines tuned to the engine manufacturer's specifications.
- All diesel heavy construction equipment shall not idle for more than five minutes. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement.

## Cultural Resources

**MM CUL-1** **Project Archaeologist.** Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring. Program (CRMP). A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. The plan will involve notification procedures for contacting the County, County review, and how the County will involve AB 52 consulting tribes. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval. The County will provide the draft plan to AB 52 consulting tribes for review and comment.

Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.

**MM CUL-2** **Develop and Implement Cultural Resources Environmental Awareness Training.** Prior to issuance of a Notice to Proceed by the County and for the duration of ground disturbance (as defined in MM TCR-1), the Applicant shall provide Worker Environmental Awareness Program (WEAP) training to all workers prior to or on their first day of employment at the Project site. The training shall be prepared by the Cultural Resources Specialist (CRS), may be conducted by any member of the archaeological team, and may be presented in the form of an annotated and narrated digital slide show. Tribal representatives will be given the opportunity to participate in the WEAP training. The training shall be prepared in consultation with culturally affiliated Native Americans to incorporate the tribal knowledge and perspectives from these Native American groups into the presentation The CRS shall be available (by telephone or in person) to answer questions posed by employees. The training may be discontinued when ground disturbance is completed or suspended but must be resumed if ground disturbance resumes. Training shall include the following:

- A discussion of applicable laws and penalties under the law
- Samples or visuals of artifacts that might be found in the Project vicinity.
- A brief review of the cultural sensitivity of the Project and the surrounding area

- A discussion of what such artifacts may look like when partially buried, or wholly buried and then freshly exposed.
- A discussion of what prehistoric and historical archaeological deposits look like at the surface and when exposed during construction, and the range of variation in the appearance of such deposits.
- Instruction that only the CRS, alternate CRS, and supervisory cultural resource field staff have the authority to halt ground disturbance in the area of a discovery to an extent sufficient to ensure that the resource is protected from further impacts, as determined by the CRS.
- Instruction that employees are to halt work on their own in the vicinity of a potential cultural resources discovery and shall contact their supervisor and the CRS or supervisory cultural resource field staff, and that redirection of work would be determined by the construction supervisor and the CRS.
- An informational brochure that identifies reporting procedures in the event of a discovery.
- An acknowledgment form signed by each worker indicating that they have received the training.
- A sticker that shall be placed on hard hats indicating that WEAP training has been completed.

This is a mandatory training, and all construction personnel must attend prior to beginning work on the Project site. A copy of the sign-in sheet shall be kept ensuring compliance with this measure. No ground disturbance shall occur prior to implementation of the WEAP training unless such activities are specifically approved by the County.

**MM CUL-3** **Archaeological Monitoring.** A qualified lead archaeological monitor that meets the Secretary of the Interior's Professional Qualifications Standards (as defined in Title 36 Code of Federal Regulations Part 61), shall be present for initial grading activities in undisturbed soil. If additional archaeological monitors are needed, they do not need to have the same SOI qualifications but may work under the supervision of the lead archaeological monitor; in such cases the lead archaeological monitor must be on site. Any additional archaeological monitors will meet the qualifications of a bachelor's degree in anthropology/archaeology or completion of an archaeological field school and two or more years of archaeological project experience. Daily monitoring forms will be completed by the archaeological monitor(s) and the CRS will be responsible for retaining and/or editing them. The lead archaeological monitor will have the authority to increase or decrease the monitoring effort should the monitoring results indicate that a change is warranted.

**MM CUL-4** **Unanticipated Resources.** The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed:

All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the Project archaeologist shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the

developer, the project archaeologist**, the Native American tribal representative, and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis.

Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

* A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other.

** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.

**MM CUL-5** **Treatment of Human Remains.** If human remains are found on this site, the developer/ permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5.

**MM CUL-6** **Phase IV Monitoring Report.** Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance with procedures stipulated in the Cultural Resources Monitoring Plan.

**MM TCR-1** **Native American Monitor**. Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for at least one Native American Monitor. A Native American Monitor is defined as an individual who is presented as a representative of a tribal government for one of the AB 52 consulting tribes for the Easley Project and who has received specialized training approved by that tribal government to serve as a monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the Project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.

**MM TCR-2** **Artifact Disposition.** Prior to Grading Permit Final Inspection, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery.

*Historic Resources*- all historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines.

*Prehistoric Resources*- One of the following treatments shall be applied:

(a) Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request.

(b) If reburial is not agreed upon by the Consulting Tribes, then the resources shall be curated at a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains.

## Noise and Vibration

**MM N-1** **Construction Restrictions.** Heavy equipment operation, noisy construction work relating to any Project features onsite, and truck trips associated with materials and equipment deliveries shall be restricted to the times delineated below, unless a special permit has been issued by the County of Riverside: during June through September, between 6 a.m. to 6 p.m.; and during October through May, between 7:00 a.m. to 6:00 p.m.

Haul truck engines and other engines powering fixed or mobile construction equipment shall be equipped with adequate mufflers. Haul trucks shall be operated in accordance with posted speed limits. Truck engine exhaust brake use shall be limited to emergencies.

The construction contractor shall locate equipment staging in areas to create the greatest distance between construction-related noise sources and noise sensitive receivers nearest the Project site during Project construction. Where feasible, the construction

contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project site. No music or electronically reinforced speech from construction workers shall be audible at noise-sensitive properties.

**MM N-2** **Public Notification Process.** At least 15 days prior to the start of ground disturbance, the Project owner shall notify all residents within one mile of the Project site and the linear facilities, by mail or by other effective means, of the commencement of Project construction. At the same time, the Project owner shall establish a telephone number for use by the public to report any undesirable noise conditions associated with the construction and operation of the Project. If the telephone is not staffed 24 hours a day, the Project owner shall include an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. This telephone number shall be posted at the Project site during construction where it is visible to passersby. This telephone number shall be maintained until the Project has been operational for at least one year.

**MM N-3** **Noise Complaint Process.** Throughout the construction and operation of the Project, the Project owner shall document, investigate, evaluate, and attempt to resolve all Project-related noise complaints. The Project owner or authorized agent shall:

(a) Use a Noise Complaint Resolution Form, or other documentation procedure acceptable to the County, to record and report the Project owner's response to resolving each noise complaint;

(b) Attempt to contact the person(s) making the noise complaint within 24 hours;

(c) Conduct an investigation to determine the source of noise in the complaint;

(d) If the noise is Project-related, take all feasible measures to reduce the source of the noise; and

(e) Submit a report to the County documenting the complaint and actions taken. The report shall include: a complaint summary, including the final results of noise reduction efforts and, if obtainable, a signed statement by the complainant stating that the noise problem has been resolved to the complainant's satisfaction.

## Paleontological Resources

**MM PR-1** **Paleontological Resource Monitoring and Mitigation Plan (PRMP).** Prior to the start of any Project-related construction activities, the Applicant shall retain a County- and BLM-approved paleontologist (Project Paleontologist) to prepare and implement a project-specific PRMP to be approved by the County and BLM. The Project Paleontologist shall hold a BLM-issued Paleontological Resource Use Permit and be responsible for implementing all the paleontological conditions of approval and for using qualified paleontologists to assist in work and field monitoring.

At a minimum, information to be contained in the PRMP, in addition to other information required under industry standard, Society of Vertebrate Paleontology standards, and BLM paleontology program policy and standards, is as follows:

- Identification (name) and qualifications of the Project Paleontologist and qualified paleontological monitors to be employed for grading operations monitoring.

- Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens.
- Description of the project site and planned earthwork and excavation.
- A site-specific plan and map prepared by the Project Paleontologist which identifies construction impact areas with sediments of High (PFYC 4) and Moderate (PFYC 3a) sensitivity for encountering significant paleontological resources and the approximate depths at which those resources are likely to be encountered for each Project component.
- The PRMP shall require the qualified paleontological monitor(s) to monitor all construction-related earth-moving activities in sediments determined to have a High (PFYC 4) sensitivity.
- The PRMP shall define monitoring procedures and methodology and shall specify that sediments of Moderate (PFYC 3a) or undetermined sensitivity shall be monitored on a part-time basis (as determined by the Project Paleontologist). Sediments with very low or low potential will not require paleontological monitoring (PFYC 1 and 2).
- The PRMP shall detail methods of recovery, preparation, and analysis of specimens, the final curation location of specimens at the repository identified in the BLM-issued Paleontological Resource Use Permit, data analysis, and reporting. Where possible, recovery is preferred over avoidance in order to mitigate the potential for looting of paleontological resources.
- The PRMP shall specify that all paleontological work undertaken by the Applicant on public lands administered by BLM shall be carried out by qualified, permitted paleontologists with the appropriate current BLM Paleontological Resources Use Permit.
- Identification of personnel with authority and responsibility to temporarily halt or divert ground-disturbance activities to allow for recovery of large specimens.

The PRMP shall be submitted to the County and BLM for review and approval 60 days prior to start of Project construction. The PRMP must be approved by the County and BLM prior to the Notice To Proceed.

**MM PR-2** **Worker Environmental Awareness Program (WEAP).** Prior to the start of Project-related construction activities, a paleontological component to the WEAP shall be developed by the Project Paleontologist. The WEAP shall address the potential to encounter paleontological resources in the field, the sensitivity and importance of these resources, and the legal obligations to preserve and protect such resources. The training program shall also include the set of reporting procedures that workers are to follow if paleontological resources are encountered during Project activities. The WEAP may be combined with other environmental training programs for the Project. All field personnel will receive WEAP training on paleontological resources prior to Project-related construction activities.

**MM PR-3** **Paleontological Monitoring and Fossil Recovery**. The PRMP shall identify monitoring frequency and intensity of all areas of the Project site, particularly in areas underlain by geologic units assigned paleontological sensitivity of High (PFYC 4) or Moderate (PFYC 3a). Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. If the Project Paleontologist determines full-time monitoring is no longer

warranted, based on the geologic conditions at depth, he or she may recommend to the BLM Authorized Officer that monitoring be reduced or cease entirely.

In the event that a paleontological resource is discovered, the paleontological monitor will have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and, if appropriate, collected. If the resource is determined to be of scientific significance, the Project Paleontologist shall complete the following:

- **Salvage of Fossils.** If fossils are discovered, all work in the immediate vicinity shall be halted to allow the paleontological monitor, and/or Project Paleontologist to evaluate the discovery and determine if the fossil may be considered significant. If the fossils are determined to be potentially significant, the Project Paleontologist (or paleontological monitor) will recover them following standard field procedures for collecting paleontological as outlined in the PRMP prepared for the Project. The Project Paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the potentially significant fossil(s) can be removed in a safe and timely manner.
- **Fossil Preparation and Curation.** The museum that has agreed to accept fossils that may be discovered during Project-related excavations will be identified on the Paleontological Resources Use Permit held by the Project Paleontologist and in the PRMP. Upon completion of Project ground-disturbing activities, all significant fossils collected shall be prepared in a properly equipped laboratory to a point ready for curation. Preparation may include the removal of excess matrix from fossil materials and stabilizing or repairing specimens. During preparation and inventory, the fossils specimens shall be identified to the lowest taxonomic level practical prior to curation at an accredited museum. The fossil specimens must be delivered to the County- and BLM-approved repository (identified on the permit and in the PRMP) and receipt(s) of collections submitted to the County and BLM no later than 60 days after all ground-disturbing activities are completed.

**MM PR-4** **Paleontological Resources Monitoring Report.** The Applicant shall ensure preparation of a paleontological resource mitigation and monitoring report by the Project Paleontologist following completion of ground-disturbing activities. The contents of the report shall include, but not be limited to, a description and inventory list of recovered fossil materials (if any); a map showing the location of paleontological resources found in the field; determinations of scientific significance; proof of accession of fossil materials into the pre-approved museum or other repository; and a statement by the Project Paleontologist that Project impacts to paleontological resources have been mitigated. The report shall be certified by the professionally qualified Project Paleontologist responsible for the content of the report and submitted to the County and BLM. In addition, all appropriate fossil location information shall be submitted to the Western Information Center, San Bernardino County Museum, and Los Angeles County Museum of Natural History, at a minimum, for incorporation into their Regional Locality Inventories.

## Public Health and Safety

**MM AQ-1** **Fugitive Dust Control Plan**. See full text in Section 3.4, Air Quality.

**MM FIRE-1** **Fire Safety.** The Fire Management and Prevention Plan prepared by the Project owner to ensure the safety of workers and the public and minimize fire risk during construction, operation and maintenance, and decommissioning for the Project shall include, but not be limited to, the following elements:

- Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, and hot work restrictions.
- Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days.
- All internal combustion engines used at the Project site shall be equipped with spark arrestors. Spark arrestors shall be in good working order.
- Once new access roads have been cut and initial fencing completed, light trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Mufflers on all cars and light trucks shall be maintained in good working order.
- Fire rules shall be posted on the Project bulletin board at the contractor's field office and areas visible to employees.
- Equipment parking areas and small stationary engine sites shall be cleared of all flammable materials.
- Smoking shall be prohibited in all vegetated areas and within 50 feet of combustible materials storage and shall be limited to paved areas or areas cleared of all vegetation.
- Each construction site (if construction occurs simultaneously at various locations) shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires.
- The Project owner shall coordinate with BLM and RCFD to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur at the Project site, including incidents such as fire or explosion at or with the BESS.
- The plan shall include information about the type of BESS technology on site, potential hazards, and procedures for disconnecting or shutting down the BESS in case of fire or to reduce the chance of fire.
- All construction workers, plant personnel, and maintenance workers visiting the plant and/or transmission lines to perform maintenance activities shall receive training on fire prevention procedures, the proper use of firefighting equipment, and procedures to be followed in the event of a fire. Training records shall be maintained and be available for review by BLM and RCFD. Fire prevention procedures shall be included in the Project's Worker Environmental Awareness Program.
- Vegetation near all solar panel arrays, ancillary equipment, and access roads shall be controlled through periodic cutting and spraying of weeds, in accordance with the Weed Management Plan.
- BLM and RCFD shall be consulted during plan preparation and fire safety measures recommended by these agencies included in the plan.

- The plan shall list fire prevention procedures and specific emergency response and evacuation measures that shall be required to be followed during emergency situations.
- All on-site employees shall participate in annual fire prevention and response training exercises with the BLM and RCFD.
- The plan shall list all applicable wildland fire management plans and policies established by state and local agencies and demonstrate how the Project will comply with these requirements.
- The Project owner shall designate an emergency services coordinator from among the full-time on-site employees who shall perform routine patrols of the site during the fire season equipped with a portable fire extinguisher and communications equipment. The Project owner shall notify BLM and RCFD of the name and contact information of the current emergency services coordinator in the event of any change.
- Remote monitoring of all major electrical equipment (transformers and inverters) will screen for unusual operating conditions. Higher than nominal temperatures, for example, can be compared with other operational factors to indicate the potential for overheating which under certain conditions could precipitate a fire. Units could then be shut down or generation curtailed remotely until corrective actions are taken.
- Fires ignited on site shall be immediately reported to BLM and RCFD.
- The engineering, procurement, and construction contract(s) for the Project shall provide reference to or clearly state the requirements of this mitigation measure.
- The Project owner must provide the Fire Management and Prevention Plan to BLM for review and approval and to RCFD for review and comment before construction.

**MM HAZ-1** **UXO Identification, Training, and Reporting Plan.** Where ground disturbance work is involved, contractor(s) shall be OSHA HAZWOPER-trained in accordance with standard 29CFR1910.120 and hold a current certification. The Applicant shall prepare a UXO Identification, Training, and Reporting Plan to properly train all site workers in the recognition, avoidance and reporting of military waste debris and ordnance. The Applicant shall submit the plan to the County and BLM for review and approval prior to the start of construction. The plan shall contain, at a minimum, the following:

- A description of the training program outline and materials, and the qualifications of the trainers; and
- Identification of available trained experts that will respond to notification of discovery of any ordnance (unexploded or not); and
- Work plan to recover and remove discovered ordnance, and complete additional field screening, possibly including geophysical surveys to investigate adjacent areas for surface, near surface or buried ordnance in all proposed land disturbance areas.

**MM HAZ-2** **Worker Environmental Awareness Program**. The WEAP prepared for the Project shall include a personal protective equipment (PPE) program, an Emergency Action Plan (EAP), and an Injury and Illness Prevention Program (IIPP) to address health and safety issues associated with normal and unusual (emergency) conditions. It will be reviewed and approved by the County and BLM prior to construction. Construction-related safety

programs and procedures shall include a respiratory protection program, among other things. Construction Plan documents shall relate at least to the following:

- Environmental health and safety training (including, but not limited, to training on the hazards of Valley Fever, including the symptoms, proper work procedures, how to use PPE, and informing supervisor of suspected symptoms of work-related Valley Fever)
- Site security measures
- Site first aid training
- Site fire protection and extinguisher maintenance, guidance, and documentation
- Furnishing and servicing of sanitary facilities records
- Trash collection and disposal
- Disposal of hazardous materials and waste guidance in accordance with local, state, and federal regulations

**MM HAZ-3** **Soil Management Plan.** Prior to issuance of demolition or grading permits, the Applicant shall prepare a Soil Management Plan (SMP) to guide activities during construction that will disturb potentially pesticide contaminated soils to ensure that potentially contaminated soils are identified, characterized, removed, and disposed of properly. The SMP shall be submitted to the County and BLM for approval prior to Project construction. The purpose of the SMP is to establish appropriate management practices for handling impacted soil or other materials that may be encountered during construction activities.

The SMP shall be implemented during Project construction and shall include, but shall not be limited to, the following components:

- Description of soil testing, which shall include (but not be limited to) the collection of shallow soil samples and analyses for pesticides to verify presence or absence of unknown pesticide soil contamination. This soil profiling shall be performed prior to initiation of Project construction.
- Protocols for sampling of in-place soil to facilitate the profiling of the soil for appropriate off-site disposal or reuse, and for construction worker safety, dust mitigation during demolition and construction and potential exposure of contaminated soil to future users of the site prior to Project construction.
- Procedures to be undertaken in the event that contamination is identified above action levels or previously unknown contamination is discovered prior to or during Project construction.
- Sampling and laboratory analyses of any excess soil requiring disposal at an appropriate off-site waste disposal facility.
- Procedures and protocols for the safe storage, stockpiling, and disposal of any contaminated soils.

If contaminants are identified at concentrations exceeding applicable screening levels, the Applicant shall submit the SMP sampling results to the County DEH and BLM and obtain oversight from the appropriate regulatory agencies. Copies of the approved SMP shall be kept at the Project site.

Any contaminated soils identified by testing conducted in compliance with the SMP and found in concentrations above established thresholds shall be removed and disposed of according to California Hazardous Waste Regulations. Contaminated soil excavated from the site shall be hauled off-site and disposed of at a licensed hazardous materials disposal site.

## Traffic and Transportation

**MM TRA-1** **Construction Traffic Control Plan.** Prior to the start of construction, the Project owner shall submit a Construction Traffic Control Plan for review and approval by Caltrans and Riverside County for affected roads and intersections that would be directly affected by the construction activities and/or would require permits and approvals. The Construction Traffic Control Plan shall include, but not be limited to:

- If multiple construction projects occur at the same time and conditions at the intersection warrant, plans for installation of a temporary signal or use of manual intersection control during the construction period at the I-10 westbound ramp at SR-177. Additionally, if conditions warrant, geometry changes shall be considered in coordination with Caltrans and Riverside County, and implemented, if necessary, in addition to signalization at the I-10 westbound ramp and SR-177. These geometry changes could include a turn pocket.
- The locations and use of flaggers, warning signs, barricades, delineators, cones, arrow boards, etc., according to standard guidelines outlined in the Manual on Uniform Traffic Control Devices, the Standard Specifications for Public Works Construction, and/or the California Joint Utility Traffic Control Manual.
- The locations of all road or traffic lane segments that would need to be temporarily closed or disrupted due to construction activities.
- The locations where guard poles, netting, or similar means to protect transportation facilities for any construction or conductor installation work requiring the crossing of a local street highway is proposed.
- The use of continuous traffic breaks operated by the California Highway Patrol on state highways (if necessary).
- Additional methods to reduce temporary traffic delays to the maximum extent feasible during morning (7:00 a.m. to 9:00 a.m.) and afternoon (4:00 p.m. to 6:00 p.m.) peak traffic periods, or as directed in writing by the affected public agency in encroachment or other permits). This should also include feasible ways to reduce construction-related trips on I-10, SR-177, and Kaiser Road during peak traffic periods.
- Plans to encourage or provide ridesharing/carpooling opportunities for construction and operational workers.
- Incorporation wildlife protection measures, as required in MM BIO-6.
- Plans to provide written notification to property owners and tenants at properties affected by access restrictions to inform them about the timing and duration of obstructions and to arrange for alternative access if necessary. The coordination shall occur at least one week prior to any blockages.

- Plans to coordinate in advance with emergency service providers to avoid restricting the movements of emergency vehicles. Police departments and fire departments shall be notified in advance by the Project owner of the proposed locations, nature, timing, and duration of any roadway disruptions, and shall be advised of any access restrictions that could impact their effectiveness. At locations where roads will be blocked, provisions shall be ready at all times to accommodate emergency vehicles, such as immediately stopping work for emergency vehicle passage, providing short detours, and developing alternate routes in conjunction with the public agencies.
- Define the method to maintaining close coordination, prior to and during construction, with Caltrans and Riverside County to minimize cumulative impacts of multiple simultaneous construction projects affecting shared portions of the circulation system. Coordination with adjacent development projects to spread work shifts into multiple hours (instead of peak hour) or the installation of additional temporary traffic signals or manual traffic control officers during peak hours to mitigate the temporary impacts.

**MM TRA-2** **Repair Roadways and Transportation Facilities Damaged by Construction Activities.** If roadways, sidewalks, medians, curbs, shoulders, or other such transportation features are damaged by Project construction activities, as determined by the affected public agency, such damage shall be repaired and restored to their pre-Project condition by the Project owner. Prior to construction, the Project owner shall confer with Caltrans and Riverside County regarding the roads within 500 feet in each direction of Project access points (where heavy vehicles will leave public roads to reach Project sites) and regarding the roads to be crossed by the proposed gen-tie line. At least 30 days prior to construction, or as requested by Riverside County or Caltrans, the Project owner shall photograph or video record all affected roadway segments and shall provide Riverside County and Caltrans with a copy of these images, if requested.

At the end of major construction, the Project owner shall coordinate with each affected jurisdiction to confirm whether repairs are required. Any damage demonstrable to the Project is to be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by the Project owner and the affected jurisdiction. If multiple projects are using the transportation features, the Easley Project owner shall pay its fair share of the required repairs. the Project owner shall provide Riverside County and Caltrans (as applicable) proof when any necessary repairs have been completed.

## Vegetation and Wildlife Resources

**MM BIO-1** **Biological Monitoring.** Monitoring to ensure conformance with conditions of approval, including effective protection and avoidance of biological resources, shall be implemented by the Applicant as follows:

***Biological Monitoring Team*.** During construction and decommissioning, the Applicant shall employ a biological monitoring team to oversee Project activities. Any activity that may impact vegetation, wildlife, and sensitive resources shall be monitored to ensure compliance with all mitigation measures for biological resources.

The biological monitoring team shall consist of:

- *Lead Biologist:* The Applicant shall assign a Lead Biologist, approved by Riverside County, BLM, CDFW, and USFWS as the primary point of contact for the BLM and resource agencies regarding biological resources mitigation and compliance. The Lead Biologist shall have an approved MOU with Riverside County prior to commencing work on the Project.
- *Biological Monitor:* Biological monitors shall be overseen by the Lead Biologist and shall perform any required surveys, ground disturbance and construction monitoring, wildlife monitoring, inspections, marking sensitive resource buffers, and revegetation monitoring during Project activities. Biological monitors shall include trained desert tortoise monitors (MM BIO-7) and nest monitors (MM BIO-8).
- *Authorized Desert Tortoise Biologist:* For desert tortoise protection measures (MM BIO-7), the Applicant shall nominate a qualified individual to serve as Authorized Desert Tortoise Biologist, for approval by the USFWS and CDFW.

The Applicant shall provide the resumes of the proposed Biological Monitoring Team to the BLM and Riverside County for approval prior to onset of ground-disturbing activities. The Biological Monitoring Team shall have demonstrated expertise with the biological resources within the Project region. The Biological Monitoring Team shall have authority to halt any activities in any area if it is determined that the activity, if continued, would cause an unauthorized adverse impact to biological resources.

The duties of the Biological Monitoring Team shall vary during the construction, O&M, and decommissioning phases, based on the biological monitoring tasks needed for compliance during each phase. During O&M, an Applicant staff member serving as a compliance manager may perform the duties of the Lead Biologist to ensure compliance with biological mitigation measures, such as performing inspections for entrapped wildlife and fence condition, reporting dead or injured wildlife, avoiding nesting birds, and inspections of panel washing. The Applicant's compliance manager, if serving as Lead Biologist during O&M, shall have an approved MOU with Riverside County prior to commencing Lead Biologist duties on the Project.

In general, the duties of the Lead Biologist shall include, but shall not be limited to:

- Regular, direct communication with representatives of the BLM, and other agencies, as appropriate. The Lead Biologist, or during O&M, the Applicant's compliance manager, shall immediately notify the BLM and applicable resource agencies in writing of dead or injured special-status species, or of any non-compliance with biological mitigation measures or permit conditions.
- Train and supervise Biological Monitors, including desert tortoise monitors, nest monitors, and construction monitors.
- Conduct or oversee Worker Environmental Awareness Program (WEAP) training (MM BIO-2).
- During construction and decommissioning, clearly mark and inspect sensitive biological resource areas in compliance with regulatory terms and conditions.

- Oversee wildlife clearance surveys, ground disturbance and grading, and biological monitoring. Ensure that all biological monitoring is completed properly and on schedule.
- Conduct or oversee bi-weekly compliance inspections during ground-disturbing activities and communicate any remedial actions needed (i.e., trash, fence, weed maintenance; wildlife mortality) to maintain compliance with mitigation measures.

***Reporting*.** The Lead Biologist, or during O&M, the Applicant's compliance manager, shall report regularly to the BLM and Riverside County to document the status of compliance with biological mitigation measures.

During construction and decommissioning:

- Provide weekly verbal or written updates to the BLM with any information pertinent to the BLM and Riverside County, to resource agencies, or to state or federal permits for biological resources.
- Prepare and submit monthly and annual compliance reports to include a summary of Project activities that occurred, biological resources surveys and monitoring that were performed, any sensitive or noteworthy species observed, weed infestations removed, and non-compliance issues and remedial actions that were implemented.

During O&M:

- Conduct quarterly compliance inspections and reporting, to be submitted to the BLM and Riverside County, to document the condition of exclusion fencing, wildlife mortality, and any biological resource issues of note.

**MM BIO-2** **Worker Environmental Awareness Training.** The Lead Biologist shall prepare and implement a Worker Environmental Awareness Program (WEAP). The Applicant shall be responsible for ensuring that all workers at the site receive WEAP training prior to beginning work on the Project and throughout construction and operations. The WEAP shall be available in English and Spanish. The Applicant shall submit the WEAP to the lead agency and resource agencies for approval prior to implementation. The WEAP will:

- Be developed by or in consultation with the Lead Biologist and consist of an on-site or training center presentation with supporting written material and electronic media, including photographs of protected species, available to all participants.
- Provide an explanation of the function of flagging that designates authorized work areas; specify the prohibition of soil disturbance or vehicle travel outside designated areas.
- Discuss general safety protocols such as vehicle speed limits, hazardous substance spill prevention and containment measures, and fire prevention and protection measures.
- Review mitigation and biological permit requirements.
- Explain the sensitivity of the vegetation and habitat within and adjacent to work areas, and proper identification of these resources.
- Discuss the federal and state Endangered Species Acts, Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act and the consequences of non-compliance with these acts.

- Discuss the locations and types of sensitive biological resources on the Project site and adjacent areas and explain the reasons for protecting these resources.
- Inform participants that no snakes, other reptiles, birds, bats, or any other wildlife shall be harmed or harassed.
- Place special emphasis on species that may occur on the Project site and/or gen-tie lines, including special-status plants, Crotch bumble bee, desert tortoise, burrowing owl, golden eagle, nesting birds, desert kit fox, American badger, and burro deer.
- Specify guidelines for avoiding rattlesnakes and reporting rattlesnake observations to ensure worker safety and avoid killing or injuring rattlesnakes. Rattlesnakes should be safely removed from the work area using appropriate snake handling equipment, including a secure storage container for transport, or by calling local animal control.
- Describe workers' responsibilities for avoiding the introduction of invasive weeds onto the Project site and surrounding areas, describe the Integrated Weed Management Plan.
- Provide contact information for the Lead Biologist and instructions for notification of any vehicle-wildlife collisions or dead or injured wildlife species encountered during Project-related activities.
- Include a training acknowledgment form to be signed by each worker indicating that they received training and shall abide by the guidelines.
- Desert Tortoise Education Requirements: Prior to the start of construction activities, a desert tortoise education program shall be presented by the Lead Biologist to all personnel who will be present on Project work areas. Following the start of construction, any new employee shall be required to complete the tortoise education program prior to working on site. At a minimum, the tortoise education program shall cover the following topics:
  (a) A detailed description of the desert tortoise, including color photographs;
  (b) The distribution and general behavior of the desert tortoise;
  (c) Sensitivity of the species to human activities;
  (d) The protection the desert tortoise receives under the state and federal Endangered Species Acts, including prohibitions and penalties incurred for violation;
  (e) The protective measures being implemented to conserve the desert tortoise during construction activities;
  (f) Procedures and a point of contact if a desert tortoise is observed on site.

**MM BIO-3** **Minimization of Vegetation and Habitat Impacts.** Prior to ground-disturbing activities during construction, O&M, or decommissioning, authorized work areas shall be clearly delineated and sensitive resources that require avoidance would be flagged by the Lead Biologist. These areas shall include, but not be limited to, staging areas, access roads, and sites for temporary placement of construction materials and spoils. Delineation may be implemented with common orange vinyl "fencing" or staking to clearly identify the limits of work and will be verified by the Lead Biologist. No paint or permanent discoloring agents shall be applied to rocks or vegetation (to indicate surveyor construction activity

limits or for any other purpose). Fencing/staking shall remain in place for the duration of construction. Spoils shall be stockpiled in disturbed areas. All disturbances, vehicles, and equipment shall be confined to the fenced/flagged areas.

Construction activities shall minimize soil and vegetation disturbance and onsite construction/vehicle trips to minimize impacts to soil and root systems. Erosion control shall be implemented as described in the Drainage Erosion and Sedimentation Control Plan (DESCP) (MM HWQ-1), which requires identification of erosion treatments for exposed soil, such as chemical-based dust palliatives, soil bonding, and weighting agents suitable for use around vegetation. Additional BMPs, as committed to by the Applicant and incorporated into the Project Description, are described in Section 2.7 and include designation of primary travel routes, limiting grading to specific areas, building racking material in laydown areas to minimize use of roads, using equipment with smaller rubber-wheeled vehicles, maintaining hydrologic flow patterns, and preserving propagule islands to support vegetation recovery.

Upon completion of construction activities in any given area, all unused materials, equipment, staking and flagging, and refuse shall be removed and properly disposed of, including wrapping material, cables, cords, wire, boxes, rope, broken equipment parts, twine, strapping, buckets, and metal or plastic containers. Any unused or leftover hazardous products shall be properly disposed of off-site in accordance with applicable legal requirements.

Hazardous materials shall be handled in accordance with applicable legal requirements, and spills or leaks shall be promptly corrected and cleaned up according to applicable legal requirements. Vehicles shall be properly maintained to prevent spills or leaks. Hazardous materials, including motor oil, fuel, antifreeze, hydraulic fluid, grease, shall not be allowed to enter drainage channels.

**Low-Impact Site Preparation and O&M.** Native vegetation shall be allowed to recover from rootstocks and seed bank wherever facilities do not require permanent vegetation removal (e.g., access roads, foundations, paved areas, or fire clearance requirements) within the perimeter fenceline of the solar facilities and under solar arrays. Project BMPs to minimize impacts during site preparation require that primary travel routes be designated through panel arrays to minimize disturbance between rows; that grading be limited to specific areas, including roads, substation, O&M facilities, laydown areas, some equipment pads, and in discrete areas within the arrays; and that small rubber-wheeled equipment be used.

During O&M, vegetation height and density shall be managed as needed for fire safety and operation of the solar panels. Onsite vegetation that re-establishes under the solar panels will be periodically trimmed to a height no more than 12 inches, to avoid interference with the panels. Vegetation may require trimming approximately once every three years, as needed. Revegetation of native habitat and protection of erosive soils shall be implemented in temporary impact areas, as described in MM BIO-4 and MM BIO-5.

**Compensation for impacts to Desert Pavement.** Compensatory mitigation for impacts to desert pavement shall be identified prior to disturbance of the features at a minimum 1:1 ratio, in coordination with BLM and CDFW.

**MM BIO-4** **Integrated Weed Management Plan.** The Applicant shall prepare and implement an Integrated Weed Management Plan (IWMP) to minimize or prevent invasive weeds from infesting the site or spreading into surrounding habitat.

The IWMP must comply with existing relevant BLM plans and permits including the Vegetation Treatments Using Herbicides (BLM, 2007) and Vegetation Treatment Using Aminopyralid, Fluroxypyr, and Rimsulfuron (BLM, 2016b), and must be approved by BLM and Riverside County (or its designated representative). Use of any pesticides would conform with licensing and application requirements from the California Department of Pesticide Regulation.

Prior to herbicide use on BLM-administered lands, the BLM requires that a Pesticide Use Proposal (PUP) (BLM, 2019) be submitted to ensure that Projects follow herbicide use policies. If herbicides or pesticides will be used on BLM lands, the Applicant shall submit a Pesticide Use Proposal (PUP) form, to be approved by the BLM (also see Section 3.10.5 on hazardous materials). The PUP details which herbicides, pesticides, and associated adjuvants will be used for treatment, location of applications, responsible parties, time-line for treatment, application methods, application rates and maximum annual amounts, target species, and precautions for humans, sensitive resources, and non-target vegeta-tion. Only a State of California and federally certified contractor will be permitted to perform herbicide applications. Only herbicides and adjuvants approved by the State of California and BLM for use on public lands will be used within or adjacent to the federal land segments of the Project.

The Applicant shall submit the BLM approved PUP to Riverside County and implement the requirements of the PUP on private lands.

The IWMP shall require that cover and density of non-native plants within temporarily disturbed areas will be no more than 25% of total cover, or no more than comparable adjacent undisturbed lands. Total cover on the Project site shall be calculated during the annual quantitative monitoring as required in the Vegetation Resources Management Plan (MM BIO-5), which shall complement the IWMP. Quantitative monitoring shall be performed using California Native Plant Society (CNPS) Combined Vegetation Rapid Assessment and Relevé Protocol (CNPS, 2022). Qualitative and quantitative vegetation monitoring will continue for a period of no less than three (3) years or until the defined success criteria are achieved (up to 5 years).

**PLAN REQUIREMENTS**

Consistent with DRECP CMA LUPA-BIO-10 (Standard Practices for Weed Management), the Plan shall include:

- Plan objectives, including weed prevention, identification, and control via eradication, suppression, and containment;
- A list and discussion of weed species occurring or potentially occurring in the Project area, including Cal-IPC threat rankings;
- Role and responsibilities of a Weed Management Biologist, who will track, manage, and coordinate weed management activities;

- A discussion of methods to prevent introduction or spread of weeds, including worker training, vehicle cleaning and inspections, and use of weed-free seed, erosion control materials, and other construction material (gravel, sand, fencing);
- Requirements for annual monitoring of the Project site and 100-foot buffer in the early spring and late summer/early fall during construction, O&M, and decommissioning, and for 5 years after decommissioning;
- A description of monitoring methods to identify and map infestations;
- A description of manual and mechanical treatments that may be used to suppress, contain, or eradicate invasive weeds, such as use of hand or power tools, hand pulling, and soil solarization;
- A description of chemical treatments (herbicide) that may be used, including permitting and regulatory requirements for use, types of herbicides to be used such as pre-emergent, post-emergent, selective, and non-selective and the weeds they affect, application methods and rates, handling and cleanup procedures, and best practices to minimize impacts of herbicide use on wildlife and native vegetation, such as suspending treatments when winds are high or if precipitation is imminent, mixing herbicides over a drip pan at least 200 feet from open or flowing water, inspecting containers for leaks, and maintaining spill kits in vehicles and storage areas;
- A requirement for any herbicides used to meet the requirements of the BLM Vegetation Treatment guidelines (BLM, 2007; BLM, 2016b) and be implemented in accordance with the PUP (BLM, 2019);
- A description of reporting, to require management and monitoring reports during construction, O&M and decommissioning, and for 5 years after decommissioning;
- Annual reports shall include the location, species, extent, and density of weeds; a description of management efforts, dates, locations, types of treatment, and results; and a summary of preventative measures such as vehicle wash logs and facilities and success of measures.

**MM BIO-5a** **Vegetation Resources Management Plan.** The Applicant shall prepare and implement a Vegetation Resources Management Plan (VRMP), to be reviewed and approved by USFWS, CDFW, BLM, and Riverside County (or its designated representative). The VRMP shall detail the methods to revegetate temporarily impacted sites and salvage special-status plants from the Project footprint; and outline long-term vegetation management within the solar facility during its operations. The Lead Biologist shall oversee implementation of the VRMP to meet success criteria and prevent further degradation of areas temporarily disturbed by Project activities.

The Plan shall require that total native vegetation cover will be no less than 80% of total vegetation cover on nearby undisturbed lands of comparable quality. Project sites previously disturbed by anthropogenic activities will be compared to nearby, similarly pre-disturbed sites.

As described below, total cover on the Project site shall be calculated during the annual quantitative monitoring as required in the VRMP, using California Native Plant Society (CNPS) Combined Vegetation Rapid Assessment and Relevé Protocol (CNPS, 2022).

Transplantation of cacti and ocotillo shall be considered successful with 75% survival after 3 years. If unsuccessful, remediation will be implemented to plant additional cacti at a 2:1 ratio.

**PLAN REQUIREMENTS**

Consistent with DRECP CMAs LUPA-BIO-7 (Restoration of Areas Disturbed by Construction Activities but Not Converted by Long-Term Disturbance), LUPA-BIO-VEG-1 (vegetation management for cactus, yucca, and other succulents under BLM policy), and LUPA-BIO-VEG-5 (adherence to BLM regulations and policies regarding salvage and transplants of cactus, yucca, other succulents, and BLM sensitive plants), the Plan shall include:

- *Revegetation of temporarily impacted sites.* The Plan shall specify methods to prevent or minimize further site degradation; stabilize soils; maximize the likelihood of vegetation recovery over time (for areas supporting native vegetation); and minimize soil erosion, dust generation, and weed invasions. The nature of revegetation will differ according to each site, its pre-disturbance condition, and the nature of the construction disturbance (e.g., drive and crush, vs. blading). The Plan shall include:

  a) soil preparation measures, including locations of recontouring, decompaction, imprinting, or other treatments, as prescribed by the Lead Restoration Ecologist and consistent with CNPS Combined Vegetation Rapid Assessment and Relevé Protocol (CNPS, 2022);

  b) details for topsoil storage, as applicable;

  c) plant material collection and acquisition guidelines, including guidelines and methods for salvaging, storing, and handling seed and plants (including desert native species protected by the CDNPA and special-status plants) from the Project site, as well as obtaining replacement plants from outside the Project area (seed and plant palettes and materials shall be limited to locally occurring native species from local sources);

  d) a plan drawing or schematic depicting the temporary disturbance areas (drawing of "typical" gen-tie structure sites will be appropriate);

  e) time of year that the planting or seeding will occur and the methodology of the planting;

  f) maintenance details, including vegetation treatments; a description of the irrigation, if used; erosion control measures; and non-native weed management per the IWMP;

  g) quantitative success criteria for regrowth of vegetation, requiring at least 80% native cover and no more than 20% non-native cover;

  h) a monitoring program to measure project compliance with the success criteria, including annual quantitative monitoring in accordance with CNPS Combined Vegetation Rapid Assessment and Relevé Protocol (CNPS, 2022);

  i) contingency measures for failed revegetation efforts not meeting success criteria, which may include, but is not limited to, reseeding, re-planting, erosion repairs, modifications to irrigation, and repair or remediation of sites;

j) annual monitoring reports to be submitted to BLM and Riverside County (or its designated representative), providing a summary of the restoration and adaptive management activities for the previous year.

- *Cactus Salvage.* The Applicant shall include salvaged or nursery stock yuccas (all species), and cacti (excluding cholla species, genus Cylindropuntia) in revegetation plans. The Plan shall include:

  (a) methods of salvage, including heavy equipment or hand tools, depending on plant size. For each plant, the microsite description will be recorded, and the north-facing orientation will be identified and tagged.

  b) to the extent feasible, plants shall be salvaged during the fall or winter to minimize transplantation stress. If cacti must be salvaged during spring or summer, they shall be held over in a shade structure and protected from wind and heat until fall for transplantation. If cacti must be installed during spring or summer, shade structures or "vertical mulch" (branches cleared from the work sites) will be provided as shelter from sun and wind.

  c) guidelines for removing plants, such that plants are dug to avoid root damage. Roots shall be treated, as necessary, and plants shall be transported to avoid root damage.

  d) guidelines for storing plants, such that cacti and ocotillo shall be stored only when unavoidable. Plants shall be kept shaded and roots kept moist;

  e) specific replanting locations shall be identified within Project lands, such as revegetation areas on temporarily disturbed work sites, unless directed otherwise by BLM (for BLM land) or the County (for private land);

  f) methods for re-planting, ensuring that each salvaged plant shall be replanted in a microsite that resembles its salvage site and in the same north-facing orientation as the salvage site. Salvaged plants shall be covered deeply enough with soil to prevent root exposure and watered immediately after planting and at regular intervals thereafter based on needs of each species.

  g) quantitative success criteria for survival, requiring at least 75% survival after 3 years. If this criterion is not met, remediation shall be implemented to plant additional cacti at a 2:1 ratio or increase native vegetation cover and diversity at Project site.

  h) a monitoring program to measure project compliance with the success criteria, including quarterly quantitative monitoring of survival status and identification of remedial actions needed, such as water, shade, or protection from wind, erosion, or wildlife. Results of monitoring shall be included in the annual monitoring report, as described above.

  i) seeds from special-status plants, if found, would be salvaged for re-vegetation. CRPR 1 or 2 species that are found shall be experimentally salvaged. No quantitative success criteria are assigned for experimental salvage; however, monitoring data shall be provided to the CDFW, Riverside County, and BLM to inform future mitigation for those species.

- *Operations Phase On-Site Vegetation Management.* The Plan shall include mowing methods and scheduling for on-site vegetation management during O&M. The Plan shall describe vegetation treatments to be implemented to minimize interference with the solar panels, fire hazard, soil disturbance, and disturbance of any bird nests. Vegetation shall be inspected annually to identify hazardous vegetation or barren areas prone to erosion that require repair. All mowed or cut plant material that contains invasive weeds will be transported to a licensed solid waste or composting facility. Mowed or cut native plant material may be used on site as mulch. Weed control during O&M will be conducted as described in the IWMP (MM BIO-4).

**MM BIO-5b** **Compensation for Desert Tortoise Habitat Impacts.** The Applicant will provide compensation to offset loss of desert tortoise habitat. The acreages will be based upon final calculation of impacted acreage and will be adjusted as appropriate for other alternatives or future modifications during implementation. Consistent with CMA LUPA-BIO-COMP-1, compensation will be provided for impacts to the following resources, at the ratios specified in the table below (expressed as acres of compensation to acres impacted):

| | **Easley Project impacts to BLM Lands (acres)** |
|---|---|
| **IMPACT** | |
| Sonoran creosote bush scrub impact (outside desert tortoise critical habitat) | 1481.4 |
| Desert pavement impact | 52 |
| Desert dry wash woodland impact (direct) | 31.4 |
| Desert tortoise critical habitat impact | Up to 20 |
| **COMPENSATION** ***(NOTE: To be updated once imp[act calculations are finalized.)*** | |
| Sonoran creosote bush scrub compensation (outside of desert tortoise critical habitat) (1:1) | |
| Desert pavement compensation (outside of desert tortoise critical habitat) (1:1) | |
| Dry desert wash woodland (direct; inside and outside of desert tortoise critical habitat (5:1) | |
| Desert tortoise critical habitat compensation (not including desert dry wash woodland) (5:1) | |
| **COMPENSATION TOTAL** | |

Consistent with CMA LUPA-BIO-COMP-1, compensation acreage requirements may be fulfilled through non-acquisition (i.e., restoration and enhancement), land acquisition (i.e., preservation), or a combination of these options, with BLM approval/authorization. The Applicant will compensate for impacts at the above-specified ratios.

**MM BIO-6** **Wildlife Protection.** The Applicant shall undertake the following measures during construction and O&M to avoid or minimize impacts to wildlife. Implementation of all

measures shall be subject to review and approval by CDFW, BLM, and Riverside County (or its designated representative).

- *Wildlife avoidance.* Project activities shall minimize interference with wildlife (including ground-dwelling species, birds, bats) by allowing animals to escape from a work site prior to disturbance; conducting pre-construction surveys and exclusion measures for certain species as specified in other measures; checking existing structures (homes, trailers, etc.) for animals such as bats, barn owls, skunks, or snakes that may be present, and safely excluding them prior to removing the structures.
- *Minimize traffic impacts.* The Applicant shall specify and enforce maximum vehicle speed limits as specified in the Traffic Control Plan, to minimize risk of wildlife collisions and fugitive dust.
- *Minimize lighting impacts.* Night lighting, when in use, shall be designed, installed, and maintained to prevent side casting of light towards surrounding fish or wildlife habitat.
- *Avoid use of toxic substances.* Soil bonding and weighting agents used for dust suppression on unpaved surfaces shall be non-toxic to wildlife and plants.
- *Minimize noise and vibration impacts.* The Applicant shall conform to noise requirements specified in the noise analysis of this EIR to minimize noise to off-site habitat.
- *Water.* Potable and non-potable water sources such as tanks, ponds, and pipes shall be covered or otherwise secured to prevent animals (including birds) from entering. Prevention methods may include storing water within closed tanks or covering open tanks with 2-centimeter netting. Dust abatement shall use the minimum amount of water on dirt roads and construction areas to meet safety and air quality standards. Water sources (e.g., hydrants, tanks, etc.) shall be checked periodically by biological monitors to ensure they do not create puddles.
- *Trash.* All trash and food-related waste shall be contained in vehicles or covered trash containers inaccessible to ravens, coyotes, or other wildlife and removed from the site regularly.
- *Workers.* Workers shall not feed wildlife or bring pets to the Project site. Except for law enforcement personnel, no workers or visitors to the site shall bring firearms or weapons.

*Wildlife exclusion.* The Applicant may install temporary or permanent exclusion fencing around equipment, work areas, or Project facilities to prevent wildlife exposure to hazards such as toxic materials or vehicle strikes. If fencing is not used, openings in stored equipment that would allow for entry of wildlife shall be secured with tape or other covering to prevent entrapment. The biological monitor shall perform inspections of equipment prior to use to ensure that no birds have nested on stored equipment and that no wildlife has become entrapped. The biological monitor will inspect exclusion fence (if installed) weekly.

*Wildlife entrapment.* Project-related excavations and water tanks shall be secured or covered to prevent wildlife entry, entrapment, and drowning. Holes and trenches shall be backfilled, securely covered, or fenced. Open water tanks shall be covered or shall have other means of exit provided to prevent wildlife from drowning. Excavations that cannot be fully secured shall incorporate wildlife ramp or other means to allow trapped animals

to escape. At the end of each workday, a biological monitor shall ensure that excavations and water tanks have been secured or provided with appropriate means for wildlife escape.

*All pipes or other construction materials or supplies* shall be covered or capped in storage or laydown areas. Netting shall be installed over porta-potty vents. No pipes or tubing shall be left open either temporarily or permanently, except during use or installation. Any construction pipe, culvert, or other hollow materials shall be inspected for wildlife before it is moved, buried, or capped.

*Dead or injured wildlife* shall be reported immediately to USFWS (for federally listed species and migratory birds) and CDFW (for all wildlife) and/or the local animal control agency, as appropriate, by the Lead Biologist (or the Applicant's compliance manager during O&M). Procedures for handling of dead or injured wildlife shall be outlined in a Wildlife Protection Plan, in coordination with CDFW. A Special Purpose Utility Permit (SPUT) would be acquired from the USFWS prior to collection of migratory bird carcasses. A biological monitor shall safely move the carcass out of the road or work area if needed and dispose of the animal as directed by the agency. If an animal is entrapped, a biological monitor shall free the animal if feasible, work with construction crews to free it in compliance with safety requirements, or work with animal control, USFWS, or CDFW to resolve the situation.

*Pest control.* No anticoagulant rodenticides, such as Warfarin and related compounds (indandiones and hydroxycoumarins), may be used within the Project site, on off-site Project facilities and activities, or in support of any other Project activities.

*Measures for Crotch bumble bee.*

- All on-site personnel shall be required to attend the Worker Environmental Awareness Training Program, as detailed in MM BIO-2, which includes education program on identification and avoidance of Crotch bumble bee and nests.
- If a live individual is detected during pre-construction surveys, or incidentally, the Applicant shall take adaptive management actions in coordination with CDFW, considering CDFW guidance and best management practices at the time of the occurrence.
- Pre-construction surveys would include inspection for Crotch bumble bee nests. If any are located, CDFW would be notified and a no-disturbance buffer of at least 50 feet would be demarcated as determined by the Lead Biologist, in coordination with CDFW.

**MM BIO-7** **Desert Tortoise Protection.** No desert tortoise may be handled or relocated without authorization from USFWS and CDFW. The Applicant shall obtain incidental take authorization from both agencies to address any potential take of desert tortoise, including authorization to handle or translocate desert tortoise. In addition to implementing the actions to be taken during construction, the Applicant shall prepare and implement a Desert Tortoise Protection Plan and a Raven Management Plan, with contents as defined herein.

**REQUIRED ACTIONS TO PROTECT TORTOISE DURING CONSTRUCTION**

The following shall be implemented:

- *Inspect for tortoises under vehicles*. The ground beneath vehicles parked outside of desert tortoise exclusion fencing will be inspected immediately prior to the vehicle being moved. If a tortoise is found beneath a vehicle, the vehicle will not be moved until the desert tortoise leaves of its own accord.
- *Protect tortoises on roads*. The Applicant shall specify and enforce maximum vehicle speed limits as specified in the Traffic Control Plan, to minimize risk of vehicle strikes. If a tortoise is observed on or near the road accessing a work area, vehicles will stop to allow the tortoise to move off the road on its own.
- *Tortoise Observations*. Any time a tortoise is observed within or near a work site, Project work activities will proceed only at the site and within a suitable buffer area after the tortoise has either moved away of its own accord, or if it has been trans-located off the site under authorization by the USFWS and CDFW. If a tortoise is observed outside of exclusion fencing, construction will stop, and the tortoise shall be allowed to move out of the area on its own. If a tortoise or tortoise burrow is observed within the exclusion fencing, construction in the vicinity will stop, pending translocation of the tortoise or other action as authorized by USFWS and CDFW.
- *Reporting of dead or injured specimens*. Upon locating a dead or injured tortoise, the Applicant or its agent will immediately notify the Palm Springs Fish and Wildlife Office by email or telephone. Written notification must be made within five days of the finding, both to the appropriate USFWS field office and to the USFWS's Division of Law Enforcement. The information provided must include the date and time of the finding or incident (if known), location of the carcass or injured animal, a photograph, cause of death, if known, and other pertinent information.
- *Tortoise compensatory mitigation*. Compensatory mitigation for desert tortoise shall include suitable habitat at a minimum of 1:1 ratio for impacts to desert tortoise suitable habitat and a ratio of 5:1 for impacts to desert tortoise critical habitat, in coordination with USFWS, CDFW, and in compliance with any ITPs.

**PREPARE DESERT TORTOISE PROTECTION AND RELOCATION PLAN**

To ensure safe handling and translocation in accordance with applicable wildlife agency guidance, desert tortoises shall be handled or translocated according to a Desert Tortoise Protection and Relocation Plan, to be reviewed and approved by USFWS, CDFW, BLM, and Riverside County.

The Desert Tortoise Protection and Relocation Plan shall be developed in accordance with and be consistent with the Desert Tortoise (Mojave Population) Field Manual (USFWS, 2009); Revised Recovery Plan for the Mojave Population of the Desert Tortoise (USFWS, 2011a); Translocation of Mojave Desert Tortoises from Project Sites: Plan Development Guidance (USFWS, 2020), and Health Assessment Procedures for the Mojave Desert Tortoise (USFWS, 2019b).

Relocated and translocated tortoises will be fixed with transmitters and monitored, as described below. All relocated or translocated desert tortoises will be monitored once within 24 hours of release; twice weekly for the first two weeks after release; weekly

during the more-active season; biweekly during the less-active season; and for a duration agreed upon by Riverside County, BLM, USFWS, and CDFW from date of release.

**PLAN REQUIREMENTS**

Consistent with DRECP CMAs LUPA-BIO-COMP-1: (Compensation); LUPA-BIO-IFS-1: (Individual Focus Species [IFS]: Desert Tortoise [activities within desert tortoise linkages]); LUPA-BIO-IFS-2: (new roads in Tortoise Conservation Areas [TCAs]), LUPA-BIO-IFS-3: (culvert sizing for desert tortoise), LUPA-BIO-IFS-4: (desert tortoise exclusion fencing), LUPA-BIO-IFS-5: (desert tortoise monitoring for initial clearing and grading), LUPA-BIO-IFS-6: (desert tortoise monitoring during geotechnical boring), LUPA-BIO-IFS-7: (desert tortoise monitoring during geotechnical testing), LUPA-BIO-IFS-8: (inspections for desert tortoise under vehicles), LUPA-BIO-IFS-9: (speed limits in desert tortoise habitat), LUPA-VPL-BIO-IFS-1: (site activities in previously disturbed areas in desert tortoise linkages and TCAs), DFA-BIO-IFS-1: Individual Focus Species (IFS) (protocol surveys in desert tortoise habitat), DFA-BIO-IFS-2 (setback requirements), DFA-BIO-IFS-3: Desert Tortoise (desert tortoise translocation), the Desert Tortoise Protection and Relocation Plan shall include:

***Authorized personnel titles and roles.*** The Applicant shall designate a USFWS Authorized Biologist to implement the desert tortoise protection measures. The Authorized Biologist may (or may not) also serve as the Project's Lead Biologist.

The Applicant shall employ one or more desert tortoise monitors who are qualified to conduct desert tortoise clearance surveys and who will be on site during all construction. The desert tortoise monitors' qualifications will be subject to review and approval by Riverside County and the BLM. Qualifications may include work as a compliance monitor on a project in desert tortoise habitat, work on desert tortoise trend plot or transect surveys, conducting surveys for desert tortoise, or other research or field work on desert tortoise. Attendance at a training course endorsed by the agencies (e.g., Desert Tortoise Council tortoise training workshop) is a supporting qualification.

The Authorized Biologist shall direct one or more desert tortoise monitors to conduct pre-construction clearance surveys for each work area, watch for tortoises wandering into the construction areas, check under vehicles, and examine excavations and other potential pitfalls for entrapped animals.

The Authorized Biologist shall be responsible for overseeing compliance with desert tortoise protective measures and for coordination with resource agencies. The Authorized Biologist will have the authority to halt any Project activities that may risk take of a desert tortoise or that may be inconsistent with adopted mitigation measures or permit conditions. Neither the Authorized Biologist nor any other Project employee or contractor may bar or limit any communications between Riverside County, BLM, CDFW, or USFWS staff and any Project biologist, biological monitor, or contracted biologist. Upon notification by the desert tortoise monitor or another biological monitor of any noncompliance the Authorized Biologist shall ensure that appropriate corrective action is taken.

The following incidents will require immediate cessation of any Project activities that could harm a desert tortoise: (1) location of a desert tortoise within a work area; (2) imminent threat of injury or death to a desert tortoise; (3) unauthorized handling of a desert tortoise, regardless of intent; (4) operation of construction equipment or vehicles

outside a Project area cleared of desert tortoise, except on designated roads; and (5) conducting any construction activity without a biological monitor where one is required.

***Worker training*.** Prior to the onset of construction activities, a desert tortoise education program will be presented by the Authorized Biologist to all personnel who will be present on Project work areas. Following the onset of construction, any new employee will be required to formally complete the tortoise education program prior to working on site. The following specifications will be incorporated into the WEAP training, identified in Mitigation Measure BIO-2. At a minimum, the tortoise education program will cover the following topics:

(a) A detailed description of the desert tortoise, including color photographs;

(b) The distribution and general behavior of the desert tortoise;

(c) Sensitivity of the species to human activities;

(d) The protection the desert tortoise receives under the state and federal Endangered Species Acts, including prohibitions and penalties incurred for violation;

(e) The protective measures being implemented to conserve the desert tortoise during construction activities; and

(f) Procedures and a point of contact if a desert tortoise is observed on site.

***Plan requirements for pre-construction and clearance surveys and use of exclusion fencing*.** Prior to the construction of solar facilities, temporary or permanent desert tortoise exclusion fencing will be installed around the entirety of the approved solar field and storage facility construction areas, as well as parking and laydown areas. Fenced areas would be surveyed and monitored to ensure desert tortoise are avoided.

*Construction phase tortoise exclusion fencing*. Exclusion fencing will adhere to USFWS design guidelines in the Desert Tortoise Field Manual (USFWS, 2009), where applicable. The exact location of different fencing types shall be determined in coordination with the USFWS. Permanent fencing shall be constructed with durable materials (i.e., 16 gauge or heavier) suitable to resist desert environments, alkaline and acidic soils, wind, and erosion. Temporary fencing would be built with the same materials, however it would not be trenched or buried but bent inwards flush with the ground surface.

Tortoise exclusion fencing shall include a “cattle guard” or desert tortoise exclusion gate at each entry point. This gate shall remain closed at all times, except when vehicles are entering or leaving. If it is deemed necessary to leave the gate open for extended periods of time (e.g., during high traffic periods), the gate may be left open as long as a biological monitor is present to monitor for tortoise activity in the vicinity.

*Preconstruction surveys and clearance*. No more than 10 days prior to the initiation of fence construction, a pre-activity tortoise survey shall be conducted using techniques that provide 100% visual coverage of the disturbance area. Transects will be spaced 15 feet (5 meters) apart, and within an additional buffer area of 100 feet (30 meters) transects would be spaced 10 meters apart. Clearance will be considered complete after two successive 100 percent coverage surveys have been conducted without finding any desert tortoises.

Clearance surveys must be conducted during the active season for desert tortoises (April 1 through May 31 or September 1 through October 31), unless authorized by CDFW and USFWS. If a tortoise or an occupied tortoise burrow is located during clearance surveys, work activities will proceed only at the site and within a suitable buffer area after the tortoise has either moved away of its own accord or has been translocated off the site under authorization by the USFWS and CDFW. The buffer distance shall be 100 feet during the non-active season and at least 250 feet during the active season (September-October and April-May), unless otherwise directed in the CDFW Incidental Take Permit (ITP).The Authorized Biologist shall direct a clearance survey before the tortoise fence is enclosed to ensure no tortoises are in the work area. Any potentially occupied burrows will be avoided until monitoring or field observations (e.g., with a motion-activated camera or fiber-optic mounted video camera) determines absence. If live tortoises or an occupied tortoise burrow are identified in the work area, tortoises shall be relocated under authorization by USFWS and CDFW or allowed to leave on their own accord before enclosing the fence. The fence shall be either continuously monitored prior to closure, or clearance surveys shall be repeated prior to closure after tortoises are removed.

*Fence monitoring*. A biological monitor shall be present during all fence installation activities to inspect the work area and under vehicles for desert tortoise prior to ground disturbance or vehicle access to ensure that no tortoises have moved into the work area. If a desert tortoise moves into the work area, activities will halt until it moves out of the work site on its own accord or is moved from harm's way by an Authorized Biologist.

*Fence inspections*. Exclusion fencing will be inspected daily for the first two weeks following installation, to monitor for desert tortoise exhibiting fence-walking behavior. If none are observed, exclusion fencing will be inspected weekly during desert tortoise active seasons (April 1 to May 31 and September 1 to October 31), at least monthly during non-active seasons (June to September, November to March), and following all rain events, and corrective action taken if needed to maintain it.

*Unfenced work areas*. As an alternative to exclusion fencing, any work conducted in an area that is not fenced to exclude desert tortoises (e.g., gen-tie tower sites) must be monitored by a biological monitor who will stop work if a tortoise enters the work area. Work activities will proceed only at the site and within a suitable buffer area after the tortoise has either moved away of its own accord, or if it has been translocated off the site under authorization by the USFWS and CDFW. Work sites with potential hazards to desert tortoise (e.g., auger holes, steep-sided depressions) that are outside of the desert tortoise exclusion fencing will be fenced by installing exclusionary fencing, covered, or will not be left unfilled overnight.

***Plan requirements for handling of desert tortoise.*** Only persons permitted by the USFWS and CDFW under the Desert Tortoise Activity Form (i.e., streamlined Section 7 consultation process) or Incidental Take Permit shall handle desert tortoises. All desert tortoises will be handled by an Authorized Biologist in accordance with the Desert Tortoise Field Manual (2009) and the USFWS Revised Translocation Guidance (2020). Authorized Biologists shall handle tortoises in accordance with approved disinfection and sanitation techniques and procedures defined by the Desert Tortoise Health Assessment Procedures (USFWS, 2019a).

Tortoises shall be handled according to seasonal and temperature constraints, where any handling of desert tortoises would always be below the temperature of 95°F. During handling, the desert tortoise will be kept in a shaded environment that does not exceed 95°F and will not be released until ambient air temperatures fall below 95°F.

Biologists will maintain a record of all desert tortoises identified and handled on the Project site, including photographs, time and location of handling, temperature, condition and measurements of the individual, transmitter information, and information on nests, eggs, and voiding of bladder. Should a tortoise void or defecate between capture and release, it shall be thoroughly rehydrated and rinsed to remove any odors that could attract potential predators. Any desert tortoise handling event shall be completed within 30 minutes or less (not including rehydrating a desert tortoise that has voided).

The Plan shall detail methods for attaching transmitters to desert tortoises that will be relocated, translocated, or monitored. The Applicant will consult with the USFWS Desert Tortoise Recovery Office to coordinate transmitter frequencies. Radio transmitters and antennae must be mounted by an Authorized Biologist so as not to impede growth or the daily activities of the tortoise.

The Plan shall detail nest and egg handling procedures. Any nest that is found will be carefully excavated by hand by an Authorized biologist. A nest will be prepared at the release site with the same depth and location in relation to the burrow entrance as the original nest. The eggs will be transferred to the new nest, maintaining their original orientation and replaced so that they touch one another. Eggs will be gently covered with soil from which cobbles and pebbles have been removed so that all the air spaces around the eggs are filled.

To the greatest extent practicable, bromating (hibernating) tortoises will not be relocated or translocated. If a bromating desert tortoise cannot be avoided by Project activities or be passively relocated, the tortoise may be captured and released in coordination with USFWS and CDFW.

***Procedures for relocation, passive exclusion, and translocation of desert tortoise and identification and description of translocation recipient sites*.**

*Relocation*. Desert tortoises less than 160 mm will be relocated as soon as possible after detection. Adult desert tortoises (more than 160 mm) identified for relocation will be fixed with transmitters and left in situ or within on-site pens following health assessments, data collection, and monitoring, until they can be transported. The Plan shall detail the construction of on-site pens, in accordance with USFWS guidance (USFWS, 2011).

*Passive exclusion*. Passive exclusion shall be prioritized on all linear Project components and in unfenced work areas by using a biological monitor to accompany construction crews and equipment in the field. Construction or maintenance activities will cease if a desert tortoise is detected within the work area or if a tortoise is in imminent danger, until the tortoise moves a safe distance out of the work area. Desert tortoises would be relocated from unfenced work areas if a tortoise does not leave a work area and no other alternate work site is available for crews or an occupied burrow is located within or adjacent to a work area that cannot be avoided.

A Biological Monitor would monitor initial clearing and grading activities for any tortoises missed during the clearance survey. Excavations with steep walls shall have a wildlife

escape ramp and be fully covered at the end of the workday to prevent entrapment. After vegetation is fully removed within fenced areas, weekly spot checks shall be conducted to ensure that there are no desert tortoises within the construction area for the duration of the construction phase.

*Translocation*. If a desert tortoise is found and is not in an area appropriate for relocation (i.e., suitable habitat does not occur within a 1.5-kilometer buffer surrounding the potential release point), the tortoise will be translocated. Translocations shall occur during the tortoise active season.

The Plan shall detail methods and procedures for translocation, including health assessments, transportation requirements, and identification of comparable release locations, in accordance with the Desert Tortoise Field Manual (USFWS, 2009). Per the USFWS Translocation Guidance (2020), a translocation review package, incorporating the penultimate health assessment in the month before the scheduled translocation, shall be submitted to Riverside County, BLM, USFWS, and CDFW for approval of the proposed disposition of each tortoise on the Project site.

Recipient sites shall be approved in consultation with BLM, USFWS, and CDFW, and shall be comprised of suitable desert tortoise habitat with modelled high desert tortoise occupancy (Nussear, 2009). The recipient site shall be sited within desert tortoise critical habitat, unless otherwise directed by the agencies.

***Plan requirements for construction monitoring and reporting.***

*Construction monitoring and reporting*. During the construction phase, the Authorized Biologist shall prepare daily records of desert tortoise observations and site inspections. If at any time a desert tortoise is identified on the Project site, Riverside County, BLM, USFWS, and CDFW will be notified.

Reporting for construction monitoring and implementation of the Plan shall be provided in weekly updates and monthly reporting to Riverside County, BLM and USFWS, as well as quarterly reporting to CDFW. Annual and final reports shall be submitted to Riverside County, BLM, USFWS, and CDFW, as required. Summaries of compliance tortoise surveys, relocation, translocation, and monitoring activities conducted during the previous calendar year will be included.

*Translocation monitoring and reporting*. Telemetry-based monitoring shall be implemented for at least six months to document short-term survival of small numbers of translocated tortoises. The Applicant will consult with Riverside County, BLM, USFWS, and CDFW to determine the appropriate monitoring duration and methodology. All relocated or translocated desert tortoises will be monitored once within 24 hours of release; twice weekly for the first two weeks after release; weekly during the more-active season; biweekly during the less-active season; and for a duration agreed upon by Riverside County, BLM, USFWS, and CDFW from date of release. Health assessments shall be performed twice-annually.

Reporting for translocation shall be provided in weekly updates and monthly reporting to Riverside County, BLM and USFWS, as well as quarterly reporting to CDFW. Annual and final reports will be submitted to Riverside County, BLM, USFWS, and CDFW. Summaries of all compliance tortoise translocation, and post-translocation, effectiveness, and health monitoring activities conducted during the previous calendar year will be included.

***Plan requirements for O&M, decommissioning, and adaptive management.***

*O&M*. At the Applicant's discretion, and in consultation with resource agencies, permanent desert tortoise exclusion fencing may be installed around each solar facility site, or the Applicant may prepare and implement a monitoring and avoidance program to ensure no take of desert tortoise during O&M, while allowing wildlife (possibly including desert tortoise) to move through the facilities uninjured.

Tortoises observed by personnel within the fence line of the solar facility components during routine maintenance activities or along the main access road will be relocated by permitted biologists to suitable habitat within 300 meters of where it was found, or it will be translocated into suitable habitat outside of the fence line.

For any routine maintenance or emergency/unexpected repairs that require surface disturbance or heavy equipment desert tortoise shall be allowed to move out of harm's way of its own accord, or the tortoise will be relocated by an Authorized Biologist.

In areas where wildlife-friendly fencing is implemented, temporary exclusion fencing may be removed after vegetation is re-established. If used, wildlife-friendly fencing will be installed around solar arrays in the Pinto Wash Linkage and areas adjacent to desert dry wash woodland that provide higher quality desert tortoise habitat. The security fence would leave a 6- to 8-inch gap between the lower fence margin (rail or mesh) and the ground, and the bottom of the fence fabric (chain-link or similar material) would be wrapped upward so that no sharp edges are exposed along the lower fence margin.

*Decommissioning*. After decommissioning, fencing shall be removed. Desert tortoise conservation measures shall be in place and the decommissioning activities shall be monitored for the presence of desert tortoise and desert tortoise sign. Observations of desert tortoise shall be reported, and protection measures shall be coordinated with USFWS and CDFW.

*Adaptive management*. Adaptive management measures would be implemented if there is evidence of Project-related disturbance to or increased risk to desert tortoise, and where initial protection methods have been deemed ineffective based on monitoring results. Remedial actions may include repairs or modifications to fencing, additional surveying, or additional monitoring and inspections. Adaptive management measures used shall be reported in the annual report.

**PREPARE A RAVEN MANAGEMENT PLAN**

The Applicant shall develop and implement a Raven Management Plan to address activities that may occur during the pre-construction, construction, decommissioning, and O&M phases of the Project that may attract common ravens (*Corvus corax*), a nuisance species that is a subsidized predator of desert tortoises and other sensitive species in the Project vicinity.

The Applicant will submit payment to the Project sub-account of the Renewable Energy Action Team (REAT) Account held by the National Fish and Wildlife Foundation (NFWF) to support the Service's Regional Raven Management Program. The one-time fee will be as described in the cost allocation methodology, or more current guidance as provided by the Service or CDFW. The contribution to the regional raven management plan will be $105 per acre impacted.

The Plan shall be prepared in accordance with USWFS guidelines in Management of Conflicts Associated with Common Ravens in the United States (USFWS, 2023). If raven monitoring indicates an increase in local raven activity attributed to the Project, measures shall be implemented to deter ravens from the site, such as additional worker education, more stringent restrictions on water use or trash disposal, installation of nest-prevention or roost-prevention devices on Project facilities, or specific measures to "haze" ravens from Project facilities or subsidies in coordination with USFWS and CDFW.

**PLAN REQUIREMENTS**

Consistent with DRECP CMA LUPA-BIO-6 (Subsidized Predators Standards), the Raven Management Plan will be developed and implemented to:

(a) Identify conditions associated with the Project that might provide raven subsidies or attractants, including water, anthropogenic food sources, roadkill for scavengers, trash, and perches.

(b) Describe management practices and control measures to avoid or minimize conditions and subsidies that might increase raven numbers and predatory activities, such as proper and regular disposal of food waste and trash using raven proof containers; removing road-killed animals; securing water thanks from leaks; using the minimum amount of water needed for dust control, panel washing, and irrigation; and use of BMPs for perching and roosting per current standards and practices, including APLIC guidelines (2006, 2012).

(c) Describe monitoring during construction and operations, including roles and responsibilities for monitoring biologists, monitoring requirements for food and water subsidies, monitoring requirements for raven presence and nesting, and methods to identify individual ravens that prey on desert tortoises.

(d) Describe reporting requirements for monitoring results, including annual monitoring reports to be submitted to USFWS, CDFW, BLM, and Riverside County.

**MM BIO-8** **Bird and Bat Conservation Strategy (BBCS).** Bird and bat fatality and injury monitoring is being performed at the neighboring Oberon, Arica, and Victory Pass Projects. The approved BBCS plans for these projects include mortality monitoring and sampling methods, sampling design, and survey and data collection protocols. The Applicant shall use the results of post-construction bird and bat monitoring at the Oberon, Arica, and Victory Pass Projects to inform actions to be taken at the Easley Project, focused on the development of adaptive management measures that would minimize impacts and mortality to avian and bat species.

The Applicant shall prepare and implement a BBCS that acknowledges the ongoing monitoring at other projects. The BBCS shall be focused on the implementation of adaptive management measures that may be required depending on monitoring results at the other projects. Adaptive management measures shall be developed in consultation with USFWS based on the results of on-going monitoring and current standards and guidelines. Available guidelines include USFWS Considerations for Avian and Bat Protection Plans (USFWS, 2010). These measures would avoid and minimize take of birds and bats on the Project site that may be vulnerable to injury or mortality on the Project site and/or collision with Project components (IP Easley, 2023).

The plan shall be crafted to meet the following standard: If impacts to avian species are documented at Oberon, Arica, Victory Pass, and Easley Projects and these impacts are shown to result in a substantial, long-term reduction in the demographic viability of the population of the species in question, then the Applicant would coordinate with USFWS and CDFW to determine if adaptive management, as described below, must be implemented to reduce Project related impacts. Over the course of construction and O&M, fatality thresholds and future conservation measures may be subject to revision in coordination with USFWS and CDFW as new information is obtained.

**PLAN REQUIREMENTS**

Consistent with DRECP CMAs LUPA-BIO-16 (Activity-Specific Bird and Bat CMAs) and LUPA-BIO-17 (Activity-Specific Bird and Bat CMAs BBCS), the Plan shall include:

- A description of bird and bat species in the Project area;
- A project-specific risk assessment that addresses potential for take, based on threats to birds and bats from the Project, including collision, electrocution, territory abandonment, nest and roost site disturbance, habitat loss and fragmentation, disturbance from human presence, and predator subsidies, in accordance with USFWS guidelines (USFWS, 2010);
- A description of the ongoing monitoring occurring at the Oberon, Arica, and Victory Pass Projects and the findings of these programs as of the date of Plan preparation.
- A description of the monitoring that will occur at the Project site. Monitoring efforts will be designed to ensure that birds and bats are identified and avoided on the Project site, and that Project related risks are managed to detect and avoid injury and mortality.
- A description of how the adaptive management actions would be developed and a list of potential adaptive management measures that could be implemented if impacts to any avian species are shown to be occurring at Oberon, Arica, Easley, and Victory Pass and these impacts appear likely to result in a substantial, long-term reduction in the demographic viability of the population of the species in question. Adaptive management measures may include passive avian diverter installations, the use of sound, light or other means to discourage site use consistent with legal requirements, on site habitat management or control measures consistent with applicable legal requirements, or modification to support structures to exclude nesting birds.
- A requirement that adaptive management measures be implemented until monitoring data indicates that mortality has not increased due to operation of the Project; and that there is not a substantial reduction in demographic viability for the species in question

**MM BIO-9** **Nesting Bird Management Plan (NBMP).** The Applicant shall prepare and implement a Nesting Bird Management Plan (NBMP) that will provide a framework for surveying, management, and monitoring of bird nesting activities during the construction phase. The NBMP shall be prepared in conjunction with the BBCS.

The Project will either avoid vegetation clearing during the nesting season or conduct pre-construction nest surveys of potential habitat and implement no-disturbance buffer areas around active nests.

The plan shall ensure that impacts to nesting birds are avoided and minimized through establishment of adequate buffers around active nests, as determined by a qualified biological monitor. Nest surveys shall be conducted for all Project activities throughout the nesting season, (beginning January 1 for raptors and hummingbirds and February 1 for other species and continuing through August). Nest buffers shall be species-specific, ranging from 100 feet for small passerines to 500 feet for raptors, as defined by the California Public Utilities Commission Nesting Bird Working Group (2015).

**Default Buffers for Nests During Construction**

| Avian Group (nest type/location) | Species Potentially Nesting Within Easley Solar Project Site | Minimum Buffers for Ground Construction per Disturbance Level (feet)* |
|---|---|---|
| Waterfowl and rails | Canada goose, wood duck, mallard, cinnamon teal, ruddy duck, Virginia rail, sora, American coot, pied-billed grebe | 150 |
| Quail | California quail, Gambel's quail | 150 |
| Herons | Great blue heron, great egret, snowy egret, cattle egret, black-crowned night-heron | 250 |
| Birds of prey (Category 1) | American kestrel, barn owl, western screech-owl | 300 |
| Birds of prey[2] (Category 2) | Cooper's hawk, red-tailed hawk, red-shouldered hawk, great horned owl | 300 |
| Birds of prey (Category 3) | Turkey vulture, red-tailed hawk, white-tailed kite, northern harrier, long-eared owl | 500 |
| Shorebirds | Killdeer | 200 |
| Pigeons | Band-tailed pigeon | 150 |
| Doves | Mourning dove, white-winged dove, common ground-dove | 150 |
| Roadrunners | Greater roadrunner | 300 |
| Nightjars | Lesser nighthawk, common poorwill | 150 |
| Swifts | White-throated swift | 200 |
| Hummingbirds | Anna's hummingbird, Costa's hummingbird | 100 |
| Woodpeckers | Acorn woodpecker, ladder-backed woodpecker, Nuttall's woodpecker, downy woodpecker, northern flicker | 150 |
| Passerines (bridge, culvert, and building nesters) | Black phoebe, Say's phoebe, Ash-throated flycatcher, northern rough-winged swallow, cliff swallow, barn swallow, house finch (3) | 100 |
| Passerines (ground nesters, open habitats) | Horned lark, rock wren, western meadowlark, orange-crowned warbler, lark sparrow, grasshopper sparrow | 150 |
| Passerines (understory and thicket nesters) | Bushtit, Bewick's wren, blue-gray gnatcatcher (2), black-throated gray warbler, yellow-breasted chat, spotted towhee, black-chinned sparrow, sage sparrow, song sparrow, black-headed grosbeak, blue grosbeak, lazuli bunting, American goldfinch | 150 |

| Avian Group (nest type/location) | Species Potentially Nesting Within Easley Solar Project Site | Minimum Buffers for Ground Construction per Disturbance Level (feet)* |
|---|---|---|
| Passerines (shrub and tree nesters) | Pacific-slope flycatcher, Cassin's kingbird, western kingbird (2), loggerhead shrike (2)*, Hutton's vireo, western scrub-jay, American crow, common raven, verdin, bushtit, black-tailed gnatcatcher, blue-gray gnatcatcher (2), cactus wren (2)*, American robin, northern mockingbird, Le Conte's thrasher, phainopepla, yellow warbler, black-throated gray warbler, yellow-breasted chat, California towhee, black-throated sparrow, song sparrow, summer tanager, great-tailed grackle, hooded oriole, Bullock's oriole, house finch (3), Lawrence's goldfinch, lesser goldfinch | 150 (300 for species marked with *) |
| Passerines (open scrub nesters) | Loggerhead shrike (2)*, verdin, cactus wren (2)*, black-tailed gnatcatcher, wren tit, northern mockingbird, California thrasher, Le Conte's thrasher, Phainopepla, orange-crowned warbler, southern rufous-crowned sparrow, California towhee, black-throated sparrow, Brewer's blackbird, lesser goldfinch | 150 (300 for species marked with *) |
| Passerines (tower nesters) | Western kingbird (2), common raven, house finch (3) | 150 |
| Species not covered under MBTA | Domestic waterfowl, including domesticated mallards, feral (rock) pigeon, ring-necked pheasant, chukar, Eurasian collared dove, spotted dove, parrots, parakeets, European starling, house sparrow | NA |

**PLAN REQUIREMENTS**

Consistent with DRECP CMAs LUPA-BIO-16 (Activity-Specific Bird and Bat CMAs), LUPA-BIO-17 (Activity-Specific Bird and Bat CMAs BBCS), DFA-BIO-IFS-1 (Individual Focus Species (IFS) (pre-construction/activity breeding season surveys for individual species – Bendire's thrasher, burrowing owl, golden eagle), DFA-BIO-IFS-2 (Setbacks for individual species – Bendire's thrasher, burrowing owl, golden eagle), LUPA-BIO-3 (Resource Setback Standards), LUPA-BIO-RIPWET-3 (BLM Special Status Riparian Bird Species (pre-construction/activity nesting bird surveys)), and LUPA-BIO-IFS-12 (Burrowing Owl (setbacks and monitoring for burrows)) the Plan shall include:

- A site description detailing the suitability of the Project site for nesting birds, the species that may be encountered, and potential impacts to nesting birds
- Identification of qualifications, roles, and responsibilities of the Lead Biologist, biological monitors, and avian biologists
- Methods for preconstruction nest surveys and "sweeps" for nesting activity during construction, including the following:
  - Pre-construction surveys for active nests shall be conducted by one or more qualified biological monitors at the direction of the Lead Biologist.

  - Nest surveys shall be conducted for all Project activities throughout the nesting season, identified here as beginning January 1 for raptors and hummingbirds and February 1 for other species, and continuing through August 15.
  - Any nesting surveys involving passerines shall be conducted within 4 days of the initiation of any vegetation clearance or grading. Surveys involving raptors shall be conducted 7 days prior. An additional preconstruction survey shall be conducted immediately prior to initial Project related, ground disturbing activities to confirm no new nests are found. Surveys shall be repeated regularly during nesting season in nesting habitat.
  - Survey methods shall follow standard nest-locating techniques such as those described in Martin and Guepel (1993). Surveys may be systematic transects, meandering transects, or other methods which are determined by the Lead Biologist based on site-specific characteristics, performed in the Project site and a 1,200-foot buffer for raptors and a 300-foot buffer for other species surrounding each work area. If adjacent properties are not accessible to the biological monitors, the off-site nest surveys may be conducted with binoculars.
  - Detection of nests shall be reported using an Avian Nest Reporting Form developed in coordination with USFWS and CDFW.

- Establishment of exclusion buffers surrounding active nests and procedures for reduction of buffers including the following:
  - At each active nest, the biological monitor shall establish and mark a buffer area surrounding the nest where construction activities that could disrupt nesting behavior will be excluded.
  - The default buffer distance established around a particular nest shall be species-specific, as developed by the California Public Utilities Commission Nesting Bird Working Group (2015), which ranges from 100 feet for passerines to 500 feet for raptors, in coordination with BLM, CDFW, and USFWS.
  - Construction shall not occur within the designated nest exclusion buffer until the nest is no longer active (i.e., the young fledge from the nest, or the nest is abandoned).
  - Buffer reductions for special-status species shall not occur beyond the default distances without notification to BLM, USFWS, or CDFW, as appropriate, at least 3 calendar business days prior to the proposed buffer reduction. Any threatened or endangered listed species would require agency approval prior to any buffer reduction.
- Procedures for active nest monitoring:
  - Active nest monitoring shall occur at a minimum of one to three times per week, depending on site-specific conditions.
  - Nests shall be monitored and mapped from a distance, and nest details will be recorded including species, nesting stage, and nesting outcome. Only the Lead Biologist or Avian Biologist/Monitor may enter the established buffer zone of a nest.
- Guidelines for nest removal:
  - If a bird nest must be removed during nesting season, the Applicant shall notify CDFW and USFWS and retain written documentation of the correspondence. Nests

shall be removed only if they are inactive or if an active nest for a non-special status species presents a hazard to people or other wildlife. Removal of an active nest requires a permit from USFWS, which would be acquired, as needed. All nest removals shall be documented and described in the Annual Report.

- Reporting requirements:
  - A nest survey and monitoring log shall document all new and monitored nests, including date, species of bird, nest status (e.g., nest building, incubating, fledglings present, or inactive); unique identification number of each nest monitored and coordinates (easting and northing); estimated date of nest establishment; estimated fledge date; description of and distance to nearby construction activities; relative noise level; description of any nearby non-Project activities (e.g., publicly accessible roads or trails); exclusion buffer size; and description of additional measures taken to protect nests.
  - Logs and corresponding maps showing the disturbance limits, Project features, and current nest buffer data shall be updated weekly and made available to survey crews, construction personnel, and resource agencies.
  - During construction, the Applicant shall provide an Annual Report detailing a summary of nesting activities on the Project site and survey buffers. The Applicant shall provide the annual reports to Riverside County, BLM, CDFW, and the USFWS during the last quarter following each of season of construction that occurs during the nesting season.
- Adaptive Management:
  - Adaptive management measures shall be implemented if there is evidence of Project-related disturbance to nesting birds where initial protection methods (i.e., buffers) are determined to be ineffective. Triggers for adaptive management include agitation behavior (displacement, avoidance, and defense), increased vigilance behavior at nest sites, changes in foraging and feeding behavior, or nest site abandonment.
  - Potential adaptive management measures shall be identified, which may include increased buffer width; additional worker education; modifying work intervals or allowing specific work types that may be implemented on a case-by-case basis; cessation of construction activities that are the source of disturbance to the nesting bird; or installation of visual or sound barriers.

**MM BIO-10** **Gen-tie lines.** Gen-tie line support structures and other facility structures shall be designed in compliance with current standards and practices to discourage their use by raptors for perching or nesting (e.g., by use of anti-perching devices). This design also reduces the potential for increased predation of special-status species, such as the desert tortoise. Mechanisms to visually warn birds (permanent markers or bird flight diverters) shall be placed on gen-tie lines at regular intervals to prevent birds from colliding with the lines (APLIC, 2006, 2012). To the extent practicable, the use of guy wires shall be avoided because they pose a collision hazard for birds and bats. Necessary guy wires shall be clearly marked with bird flight diverters to reduce the probability of collision. Shield wires shall be marked with devices that have been scientifically tested and found to significantly reduce the potential for bird collisions. Gen-tie lines shall maintain sufficient distance between all conductors and grounded components to prevent potential for electrocution

of the largest birds that may occur in the area (e.g., golden eagle and turkey vulture). They shall utilize non-specular conductors and non-reflective coatings on insulators.

**MM BIO-11** **Burrowing Owl Avoidance and Relocation.** Burrowing owl protection and relocation will meet the following requirements, in accordance with CDFW burrowing owl protocols (1993, 2012):

- Pre-construction surveys for burrowing owls, possible burrows, and sign of owls (e.g., pellets, feathers, whitewash) will be conducted throughout each work area. Survey schedules will be coordinated with constructing the desert tortoise exclusion fence and the pre-construction desert tortoise clearance surveys. As needed, follow-up surveys will be conducted no more than 14 days prior to construction.
- Pre-construction surveys shall consist of walking parallel transects 7 to 20 meters apart, adjusting for vegetation height and density as needed, and noting any potential burrows with fresh burrowing owl sign or presence of burrowing owls.

  If an active burrowing owl burrow is detected within any Project disturbance area, or within a 150-meter buffer of the disturbance area, a 150-meter (500-foot) exclusion buffer will be maintained while the burrow remains active or occupied. The buffer may be reduced to 50 meters (160 feet) during the non-breeding season (September 1 to January 31). The size of the buffer may be adjusted based on the time-of-year, and level of disturbance in the area, after consultation with CDFW. The following provides exclusion buffer guidelines for nesting sites (CDFW, 2012); which may be adjusted in the field by the Designated Biologist/Authorized Biologist, in consultation with agency personnel.

| | **BUOW Buffer Distance (m) and Level of Disturbance*** | | |
|---|---|---|---|
| **Time of Year** | **Low** | **Medium** | **High** |
| April 1 – Aug 15 | 200 | 500 | 500 |
| Aug 16 – Oct 15 | 200 | 200 | 500 |
| Oct 16 – Mar 31 | 50 | 100 | 500 |
| *Levels of disturbance: Low =drive by, low use, once per week; Medium = 15 minutes to 2 hours of activity, less than 49 decibels, one or two passes per day; High = more than 2 hours of activity, more than 49 decibels | | | |

- Any unoccupied suitable burrows within the solar facility footprint will be excavated and filled in under the supervision of the Lead Biologist prior to site preparation. Any unoccupied burrows located outside the construction activity zones shall be left in their current condition.
- Passive relocation shall only be used during the non-breeding season, generally September 1 to February 1, to exclude burrowing owls from the Project site. Passive relocation shall be implemented to provide replacement burrows off site (if needed); collapse all unoccupied burrows within the construction site; and install a one-way door on the occupied burrow to evict the burrowing owl without handling it. Prior to any passive relocation, biologists shall survey nearby habitats to identify and inventory suitable unoccupied natural burrows for relocation. If none are available, artificial burrows shall be constructed based on the number of burrowing owls in need of relocation.

- Artificial burrows shall be located at least 50 meters outside any temporary or permanent Project impact areas, but as close as possible to the original burrow and no more than one mile from the original burrow location if possible. Artificial burrows will be designed, constructed, and installed following guidelines provided in CDFW (2012). All artificial burrows and mapped natural burrows shall be monitored for burrowing owl use at least once per quarter throughout the construction phase of the Project.
- Following the excavation of all suitable inactive burrows within the construction area and installation of artificial burrows, burrowing owls will be passively excluded from occupied burrows. Burrow exclusion will involve the installation of one-way doors in burrow openings during the non-breeding season. Following confirmation that passive exclusion burrows are unoccupied, the burrows shall be carefully excavated using hand tools, or small tracked equipment, and backfilled to ensure that they are no longer suitable for burrowing owl use.

  Compensatory mitigation for burrowing owl shall include suitable habitat for the species at a minimum of 1:1 ratio, as determined in coordination with CDFW

**MM BIO-12** **Desert Kit Fox and American Badger Relocation.** Desert kit fox and American badger protection and relocation will incorporate the following requirements:

- Under direction of the Lead Biologist, biological monitors shall conduct pre-construction surveys for desert kit fox and American badger. Surveys schedules will be coordinated with constructing the desert tortoise exclusion fence and the pre-construction desert tortoise clearance surveys. Surveys shall also consider the potential presence of dens within 100 feet of the Project boundary (including utility corridors and access roads).
- If dens are detected each den shall then be classified as inactive, potentially active, or definitely active.
  - Inactive dens directly impacted by construction activities shall be excavated and backfilled to prevent reuse. Excavation and backfilling shall be conducted in accordance with standard approved desert tortoise burrow excavation and protocols. Excavation will use hand tools or a small driver-operated backhoe under close supervision of a qualified biologist, as there are no excavation standards and protocols for desert kit fox or badger.
  - All dens identified as potentially active or active within the Project footprint (solar facilities and gen-tie work sites) shall be monitored by a biological monitor for a minimum of 3 consecutive nights using a tracking medium such as diatomaceous medium or fire clay and/or infrared camera stations at the entrance. Each active or potentially active den shall be further classified as non-natal or natal (pups are present) based on tracks or photos observed after the initial 3 consecutive nights.
  - If after 3 nights of den monitoring, no desert kit fox/badger tracks are found at the burrow entrance and no photos of the target species using the den are observed, it will be determined that the desert kit fox/badger den or complex is inactive and will be excavated. If an active non-natal den is detected on the site, a 100-foot construction exclusion zone will be established until passive relocation is successfully completed. Passive relocation methods include spray deterrents, transistor radios, and ultrasonic emitters. Any kit fox hazing activities that include the use of animal

repellents such as coyote urine must be cleared through the CDFW prior to use. With CDFW approval, the den may be blocked with natural materials or bag barriers. If these methods are unsuccessful, installation of one-way doors may be used. On the third day following one-way door installation, all den entrances will be inspected to ensure they are clear of sign and that desert kit fox or badger have vacated. Confirmed active dens may be excavated if passive relocation was successful. Dens shall be collapsed prior to construction of the perimeter fence, to allow animals the opportunity to move off site without impediment.

- Potential natal dens shall be monitored for a minimum of 3 additional consecutive nights. If a den or complex is determined to be natal, the CDFW shall be notified via email within 24 hours. A 500-foot no disturbance buffer shall be maintained around all active natal dens. Passive relocation and excavation will not be implemented until monitoring confirms that the den is no longer in active use as a natal den. Active dens identified early in the pupping season, from February 1 to April 30, will not be passively relocated or excavated without prior approval from CDFW.
- The biological monitor shall make weekly visits to the location of passive relocation to ensure that desert kit fox or badger do not re-excavate and reoccupy the area if no active ground disturbing construction is occurring within the vicinity.
- Any documented kit fox mortality shall be reported to the CDFW within 24 hours of identification. If a dead kit fox is observed, it shall be retained and protected from scavengers until the CDFW determines if the collection of necropsy samples is justified.

**MM BIO-13** **Wildlife Protection and Relocation Plan.** The Applicant shall prepare and implement a Wildlife Protection and Relocation Plan that incorporates the protection, buffer, and survey requirements for desert tortoise (MM BIO-7), burrowing owl (MM BIO-11), and desert kit fox and American badger (MM BIO-12). The Plan shall specify the requirements for each species and provide a framework for adaptive management and reporting of survey results. The Plan must be reviewed by Riverside County, BLM, CDFW, and USFWS prior to the start of ground-disturbing activities.

Desert tortoise, burrowing owl, desert kit fox, and American badger buffers shall be maintained as directed in MM BIO-7, MM BIO-10, and MM BIO-11.

**PLAN REQUIREMENTS**

Consistent with DRECP CMAs LUPA-BIO-6 (Subsidized Predators Standards), LUPA-BIO-9 (Water and Wetland Dependent Species Resources), LUPA-BIO-12 (Noise), LUPA-BIO-14 (General Standard Practices), LUPA-BIO-IFS-12 (Burrowing Owl), LUPA-BIO-IFS-13 (Burrowing Owl), DFA-BIO-IFS-1 (Individual Focus Species (IFS)), the Plan will include:

- A summary of wildlife survey methods and results;
- Detailed qualifications, roles, and responsibilities for the Lead Biologist and monitoring biologists;
- Procedures for pre-construction clearance surveys;
  - Prior to construction of solar facility, desert tortoise exclusion fencing will be installed around the entirety of the approved solar field construction areas, as well as parking and laydown areas. No more than 10 days prior to the initiation of fence

construction, a pre-activity multi-species survey shall be conducted using techniques that provide 100% visual coverage of the disturbance area. If any burrow within the potential disturbance area for fence construction or inside the planned fence line is determined to be unoccupied, it will be carefully collapsed per guidelines from the Desert Tortoise Field Manual (USFWS, 2009).

- If a burrow is potentially occupied by a target species, then further actions will be taken to passively exclude the animal during the appropriate season (as detailed in MM BIO-7, MM BIO-10, and MM BIO-11).
- Once the fence is constructed, clearance surveys within fenced areas shall consist of 100% visual coverage using pedestrian belt transects spaced at 5-meter intervals. An additional 500-foot (150-meter) buffer outside the Project boundary shall also be surveyed with pedestrian belt transects spaced at 10 meters apart, where possible, to identify any potentially active burrows or complexes that may be indirectly affected by construction activities. Surveys shall focus on sign for desert tortoise, desert kit fox, American badger, and burrowing owl.
- Any burrows or den complexes identified shall be classified as inactive, possibly active, or active. Inactive dens that would be directly impacted by construction shall be excavated. All burrows and kit fox den complexes that are potentially active or active with live individuals inside will be further observed per the requirements of individual species as detailed in MM BIO-7 (desert tortoise), MM BIO-10 (burrowing owl), and MM BIO-11 (desert kit fox, American badger). Confirmed active dens may be excavated upon successful passive relocation. Excavations shall be photographed for reporting to demonstrate success and sufficiency.

■ Methods for construction monitoring;

- Biological Monitors shall be present during fence construction (security fencing, desert tortoise exclusion fencing, or both for the solar sites), vegetation removal, and ground disturbance to ensure that wildlife is not present. After vegetation is cleared, biological monitors will perform spot checks in fenced areas immediately prior to initiation of construction to ensure that no wildlife have re-entered the site.
- Along the gen-tie line, biological monitors shall escort construction vehicles and inspect work areas prior to crews beginning any ground disturbance. All parked vehicles and equipment, and the ground beneath them, will be inspected for wildlife prior to being moved. Work activities shall be stopped by the Biological Monitor if any target species or other special-status species, such as desert tortoise, enters the work area. Work activities shall proceed at the site only after the animal has either moved away of its own accord or, is moved from harm's way by a biologist with state and federal authorization and according to any conditions identified in applicable authorizations.

■ Detailed species-specific exclusion methods for special-status wildlife as follows:

- Couch's spadefoot toad. Potential breeding habitat identified during wildlife surveys shall be inspected after sufficient rainfall for Couch's spadefoot toad. If Couch's spadefoot toads are found on the Project site, the permitting and wildlife agencies will be consulted in order to develop an avoidance strategy.

- Desert tortoise. See MM BIO-7 for details on buffers, monitoring, exclusion, relocation, and translocation.
- Burrowing owl. See MM BIO-10 for details on burrow buffers, monitoring, passive relocation, and excavation.
- Desert kit fox and American badger. See MM BIO-11 for details on den buffers, monitoring, passive relocation, and excavation.

■ Procedures for handling sick, injured, or dead wildlife;

- Resource agencies would be immediately notified of sick, injured, or dead wildlife. Written follow-up notification via email will be submitted within 24 hours, including the location (GPS record), photographs (if available), and any relevant observations at the time of detection. The animal will be handled and transported only on direction from the wildlife agencies. Health and safety precautions will be used at all times when handling the animal.

■ Description of adaptive management methods;

- If there is evidence of Project-related disturbance or increased risk to special-status wildlife, where initial protection methods have been deemed ineffective, adaptive management would be implemented in coordination with resource agencies, such as additional surveying and monitoring, increased buffers, seasonal restrictions, additional artificial replacement burrows, or agency approved wildlife relocation.

■ Description of reporting requirements;

- During construction, reporting shall be provided in weekly, monthly, quarterly, and annual compliance reports to the permitting and wildlife agencies. During O&M, reports shall be provided quarterly, unless more frequent reporting is prudent based on species presence. Reports shall provide a summary of activities performed and the results for each species. Data recorded shall be submitted as appendices to each report.

**MM BIO-14** **Streambed and Watershed Protection.** If jurisdictional features cannot be avoided, prior to ground disturbance activities that could impact these aquatic features, the Applicant shall file a complete Report of Waste Discharge with the RWQCB to obtain Waste Discharge Requirements (WDR) and shall consult with CDFW on the need for a streambed alteration agreement. Copies of the final report shall be submitted to Riverside County. If permits are required, they shall be obtained prior to disturbance of jurisdictional resources.

Compensatory mitigation for impacts to jurisdictional streambeds/washes shall be identified prior to disturbance of the features at a minimum 1:1 ratio, and a 5:1 ratio for minor incursions to desert dry wash woodland, as approved by RWQCB or CDFW, either through onsite or offsite mitigation, or purchasing credits from an approved mitigation bank. The Applicant shall comply with the compensatory mitigation required and provide proof of compliance, along with copies of permits obtained from the RWQCB and/or CDFW shall be provided to Riverside County.

A Stormwater Pollution Prevention Plan (SWPPP) or SWPPP-equivalent document shall be prepared by a qualified engineer or erosion control specialist and implemented before and during construction. The SWPPP shall include BMPs for stormwater runoff quality

control measures, management for concrete waste, stormwater detention, watering for dust control, and construction of perimeter silt fences, as needed.

- The Applicant shall implement BMPs identified below to minimize adverse impacts to streambeds and watersheds.
  - Vehicles and equipment will not be operated in ponded or flowing water except as specified by resource agencies.
  - The Applicant will minimize road building, construction activities, and vegetation clearing within ephemeral drainages.
  - The Applicant will prevent water containing mud, silt, or other pollutants from grading or other activities from entering ephemeral drainages or being placed in locations that may be subjected to high storm flows.
  - Spoil sites will not be located within 30 feet from the boundaries of drainages or in locations that may be subjected to high storm flows, where spoils might be washed back into drainages.
  - Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, unapproved herbicides, or any other substances that could be hazardous to vegetation or wildlife resources, resulting from Project-related activities, will be prevented from contaminating the soil and/or entering ephemeral drainages. The Applicant shall ensure that safety precautions specified by this measure, as well as all other safety requirements of other measures and permit conditions are followed during all phases of the Project.
  - When operations are completed, any excess materials or debris will be removed from the work area. No rubbish will be deposited within 150 feet of the high-water mark of any drainage during construction, operation, and decommissioning the Project.
  - No equipment maintenance will occur within 150 feet of any wetland, Category 3, 4, or 5 streambed, or any streambed greater than 10 feet wide. No petroleum products or other pollutants from the equipment will be allowed to enter these areas or enter any off-site state jurisdictional waters under any flow.
  - With the exception of the drainage control system installed for the Project, the installation of bridges, culverts, or other structures will be such that water flow (velocity and low flow channel width) is not impaired. Bottoms of temporary culverts will be placed at or below stream channel grade.
  - No broken concrete, debris, soil, silt, sand, bark, slash, sawdust, rubbish, or other organic or earthen material from any construction or associated activity of whatever nature will be allowed to enter into or be placed where it may be washed by rainfall or runoff into, off-site state jurisdictional waters.
  - Stationary equipment such as motors, pumps, generators, and welders located within or adjacent to a drainage will be positioned over drip pans. Stationary heavy equipment will have suitable containment to handle a catastrophic spill/leak. Clean up equipment such as brooms, absorbent pads, and skimmers will be on site prior to the start of construction.

– The cleanup of all spills will begin immediately. USFWS, SWRCB, CDFW, BLM, and Riverside County will be notified immediately by the Applicant of any spills and will be consulted regarding clean-up procedures

## Visual Resources

**APM VIS-1** **Weathering Coating of Security Fencing.** To reduce operational visual impacts of the Project to the community of Lake Tamarisk, the Project owner will apply a weathering coating (Natina or substantially similar) to the Project security fencing located closest to the Community. The coating would reduce the occurrence of reflectance, which would be visually distracting, and the typically earth-tone color of the coating would reduce the industrial character of the fencing and help it to blend more effectively with the surrounding landscape. The total length of fencing that will be coated is approximately one mile and may be contiguous or separate sections, depending on the final Project design and the location(s) of most visible security fencing.

**MM AES-1** **Surface Treatment of Project Structures and Buildings.** The Project owner shall treat the surfaces of all non-temporary, large Project structures and buildings (e.g., O&M building, substation components, inverters, electrical enclosures, gen-tie poles and conductors) visible to the public such that: (a) their colors minimize visual intrusion and contrast by blending with (matching) the existing characteristic landscape colors; (b) their colors and finishes do not create excessive glare from surface brightness; and (c) their colors and finishes are consistent with local policies and ordinances. The transmission line conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive.

Following a consultation with the Riverside County and BLM visual resources specialists, and other representatives as deemed necessary, the Project owner shall submit for the County's and BLM's review, a specific Surface Treatment Plan that will satisfy these requirements. The consultation shall be in-field at the agencies' election, or as a desktop review if preferred by the agencies. The treatment plan shall include:

(a) A description of the overall rationale for the proposed surface treatment, including the selection of the proposed color(s) and finishes based on the characteristic landscape. Colors shall be field tested using the actual distances from the KOPs to the proposed structures, using the proposed colors painted on representative surfaces;

(b) A list of each major Project structure and building, the transmission line towers and/or poles, and fencing, specifying the color(s) and finish proposed for each. Colors must be identified by vendor, name, and pantone number, or according to a universal designation system;

(c) One set of color brochures or color chips showing each proposed color and finish;

(d) A specific schedule for completion of the treatment; and

(e) A procedure to ensure proper treatment maintenance for the life of the Project. The Project owner shall not specify to the vendors the treatment of any buildings or structures treated during manufacture or perform the final treatment on any buildings or structures treated in the field until the Project owner receives notification of approval of the treatment plan by Riverside County and the BLM. Subsequent modifications to the treatment plan are prohibited without the County's and BLM's

approval for components under their respective authorities; however, the Project owner may consider the agencies' failure to respond to a request for review within 60 days an acceptance of the proposal.

**MM AES-2** **Project Design.** The Project owner shall use proper design fundamentals to reduce the visual contrast to the characteristic landscape. These include proper siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. Design strategies to address these fundamentals shall be based on the following factors:

(a) *Vegetation Manipulation:* Retain as much of the existing vegetation as possible including along roadsides to intercept sightlines from public vantage points. Use existing vegetation to screen the development from public viewing and lessen the visibility of structural contrast and glare. Use scalloped, irregular cleared edges to reduce line contrast. Use irregular clearing shapes to reduce form contrast. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.

(b) *Structures:* Minimize the number of structures and combine different activities in one structure. Use natural, self-weathering materials and chemical treatments on surfaces to reduce color contrast and the potential for reflectance (glare). Bury all or part of structures to the extent practical. Use natural-appearing forms to complement the characteristic landscape. Screen the structure from view by using natural landforms and vegetation. Reduce the line contrast created by straight edges.

(c) *Linear Alignments:* Use existing topography to hide induced changes associated with roads, lines, and other linear features. Select alignments that follow landscape contours. Avoid fall-line cuts. Hug vegetation lines.

(d) *Reclamation and Restoration:* Reduce the amount of disturbed area and blend the disturbed areas into the characteristic landscape. Where feasible, replace soil, brush, rocks, and natural debris over disturbed area. Newly introduced plant species should be of a form, color, and texture that blends with the landscape.

**MM AES-3** **Night Lighting Management.** To the extent feasible, consistent with safety and security considerations, the Project owner shall design and install all permanent exterior lighting and all temporary construction lighting such that: (a) lamps and reflectors are not visible from beyond the Project site, including any off-site security buffer areas; (b) lighting does not cause excessive reflected glare; (c) direct lighting does not illuminate the nighttime sky, except for required FAA aircraft safety lighting; (d) illumination of the Project and its immediate area is minimized; and (e) it complies with local policies and ordinances.

The Project owner shall also consult with the NPS Night Sky Program Manager in the development of the night lighting and comply with stricter standards for light intensity. All permanent light sources shall be below 3,500 Kelvin color temperature (warm white) and shall have cutoff angles not to exceed 45 degrees of nadir. The use of LED lighting with a Correlated Color Temperature (CCT) above 2,700 would introduce blue light into the environment that would have negative impacts on the night skies, wildlife, and visitors, and increase light pollution in that area. If LED light bulbs are used, they shall have a CCT of 2,700 or less. All lights, temporary and permanent, are to be fully shielded

such that the emission of light above the horizontal is prevented. Prior to construction, the Project owner shall submit to BLM, Riverside County, and NPS JTNP for review a Night Lighting Management Plan that shall include the following:

(a) Location and direction of light fixtures that take the lighting mitigation requirements into account;

(b) Lighting that incorporates fixture hoods/shielding, with light directed downward or toward the area to be illuminated;

(c) Light fixtures, which are visible from beyond the Project boundary, which have cutoff angles that are sufficient to prevent lamps and reflectors from being visible beyond the Project boundary, except where necessary for security;

(d) All lighting that is of minimum necessary brightness consistent with operational safety and security;

(e) Lights in high illumination areas not occupied on a continuous basis (such as maintenance platforms) that have (in addition to hoods) switches, timer switches, or motion detectors so that the lights operate only when the area is occupied;

(f) Specification that LPS or amber LED lighting shall be emphasized, and that white lighting (metal halide) would: (a) only be used when necessitated by specific work tasks; (b) not be used for dusk-to-dawn lighting; and (c) would be less than 3500 Kelvin color temperature;

(g) Specifications and mapping for of all lamp locations, orientations, and intensities, including security, roadway, and task lighting;

(h) Specifications for each light fixture and each light shield;

(i) Total estimated outdoor lighting footprint expressed as lumens or lumens per acre;

(j) Specifications on the use of portable truck-mounted lighting;

(k) Specifications for motion sensors and other controls to be used, especially for security lighting;

(l) Surface treatment specifications that shall be employed to minimize glare and skyglow;

(m) Documentation that the necessary coordination with the NPS Night Sky Program Manager has occurred; and

(n) Exterior lighting that complies with current Title 24 regulations from the State of California and that shall be coordinated with the California Department of Transportation (Caltrans) to comply with exterior lighting regulations along I-10 and SR-177.

## Water Resources

**MM BIO-3** **Minimization of Vegetation and Habitat Impacts.** See full text in Section 3.5 (Biological Resources).

**MM BIO-5** **Vegetation Resources Management Plan.** See full text in Section 3.5 (Biological Resources).

**MM BIO-13** **Streambed and Watershed Protection.** See full text in Section 3.5 (Biological Resources).

**MM HWQ-1** **Drainage Erosion and Sedimentation Control Plan (DESCP).** At least 60 days prior to site mobilization, the Applicant shall submit to the Regional Water Quality Control Board, the BLM, and Riverside County for review and approval a DESCP for managing stormwater during Project construction and operations and to prevent sediment or any other pollutants from moving offsite and into receiving waters. The DESCP can be included in the Stormwater Pollution Prevention Plan (SWPPP) and must ensure proper protection of water quality and soil resources, address disturbed soil stabilization treatments in the Project area for both road and non-road surfaces, and identify all methods used for temporary and final stabilization of inactive areas. The plan must also cover all linear Project features such as the proposed gen-tie line and any other Project component subject to disturbance. The DESCP shall contain, at a minimum, the elements presented below that outline site management activities and erosion and sediment-control Best Management Practices (BMPs) to be implemented during site mobilization, excavation, construction, and post-construction (operating) activities.

- *Vicinity Map*. A map(s), at a minimum scale 1 inch to 500 feet, shall be provided indicating the location of all Project elements with depictions of all significant geographic features including swales, storm drains, drainage concentration points and sensitive areas.
- *Site Delineation*. All areas subject to soil disturbance (including mowing, grubbing, grading, excavation or any other soil disturbing activity) for the Project shall be delineated showing boundary lines of all construction areas and the location of all existing and proposed structures and drainage facilities.
- *Clearing and Grading Plans*. The DESCP shall provide a delineation of all areas to be cleared of vegetation and areas to be preserved. The plan shall provide elevations, slopes, locations, and extent of all proposed grading as shown by contours, cross sections, or other means. The locations of any disposal areas, fills, or other special features shall also be shown. Existing and proposed topography shall be illustrated by tying in proposed contours with existing topography.
- *Clearing and Grading Narrative*. The DESCP shall include a table with the estimated quantities of material excavated or filled for the site and all Project elements, whether such excavation or fill is temporary or permanent, and the amount of such material to be imported or exported. All areas subject to soil disturbance shall be included in the table.
- *Erosion Control*. The plan shall address treatments to be used on exposed soil during construction and operation including specifically identifying all chemical-based dust palliatives, soil bonding, and weighting agents appropriate for use that would not cause adverse effects to vegetation. BMPs shall include measures designed to provide temporary stabilization of inactive disturbed areas and will be applied as soon as possible consistent with SCAQMD (Rule 403) and SWRCB Construction General Permit requirements. The timing of suppressant or binder application will occur as soon as possible and consistent with dust and stormwater permit requirements. Any soil stabilizers proposed shall be approved for use by the Project's Restoration Specialist to ensure that the products shall not impede restoration goals.
- *Best Management Practices Plan*. The DESCP shall identify on the topographic site map(s) the location of the site specific BMPs to be employed during each phase of

construction (initial grading, Project element excavation and construction, and final grading/ stabilization). BMPs shall include measures designed to control dust, stabilize construction access roads and entrances, and control stormwater runoff and sediment transport consistent with SCAQMD (Rule 403) and SWRCB Construction General Permit requirements.

- *Best Management Practices Narrative*. The DESCP shall show the location, timing, and maintenance schedule of all erosion- and sediment-control BMPs to be used prior to initial grading, during excavations and construction, final grading/stabilization, and operation. Separate BMP implementation schedules shall be provided for each Project element for each phase of construction. The maintenance schedule shall include post-construction maintenance of structural-control BMPs, or a statement provided about when such information would be available.
- The DESCP shall be prepared, stamped, and sealed by a professional engineer or Qualified SWPPP Developer. The DESCP shall include copies of recommendations, conditions, and provisions from the Regional Board and/or BLM.
- The DESCP may be part of the SWPPP and shall be kept onsite, kept updated, and readily available on request. The DESCP and SWPPP must demonstrate compliance with other water quality permits (WDR and LSAA), which may have restrictions on types of erosion or sedimentation control materials used. SWPPP inspection reporting will be consistent with the requirements of the SWRCB Construction General Permit.

**MM HWQ-2** **Septic System Review and Permitting.** Before the start of construction, the Applicant shall submit to Riverside County Department of Environmental Health an evaluation of the Project septic system to ensure that the proposed use of the system is consistent with federal, state, and local requirements for septic system design, including requirements for percolation, vertical distance from the groundwater table, and setback from the nearest groundwater well.

**MM HWQ-3** **Palo Verde Mesa Groundwater Basin (PVMGB) Protection.** If water for the Project, to be obtained from on- or off-site well(s) within the Chuckwalla Valley Groundwater Basin (CVGB), is extracted from on- or off-site well(s) that is/are owned and/or operated by the Applicant, the Applicant shall develop a Colorado River Water Supply Plan (CRWSP) to monitor groundwater extractions from the Applicant owned and/or operated on- or off-site well(s) to prevent impacts to the adjacent PVMGB related to groundwater extraction below the Colorado River Accounting Surface.

The CRWSP shall be submitted to the U.S. Bureau of Reclamation and BLM for review and approval at least 60 days prior to the initiation of construction. No pumping of groundwater below the accounting surface shall occur. A copy of the CRWSP shall also be submitted to the Metropolitan Water District of Southern California for review and comment.

(a) The CRWSP shall describe groundwater monitoring activities and quarterly data reports to be closely reviewed for depth to groundwater information, and proximity of the depth of Project-related groundwater pumping to the Colorado River Accounting Surface. To ensure that Project-related groundwater pumping does not draw water from below the accounting surface, the Applicant shall implement water conservation activities, including cessation of pumping, to reduce the amount of

water withdrawn from on- or off-site well(s) that is/are owned and/or operated by the Applicant.

(i) The Colorado River Accounting Surface is at an elevation between approximately 238 and 240 feet above mean sea level (amsl) in the Chuckwalla Valley (Argonne, 2013). Groundwater elevation in the Project area is approximately 489 feet amsl as of the first quarter of 2024. The numerical groundwater model developed for the Project Water Supply Assessment (GSI, 2024; discussed below) included estimates of the total cone of depression considering cumulative drawdown from all potential pumping in the CVGB, including the Project, for the life of the Project through the decommissioning phase. The estimated drawdown at the Project well after the planned 2-year construction period was less than 2 feet. The temporary drawdown at the well during pumping, however, would be greater.

(ii) Assuming a conservatively large temporary drawdown of 100 feet at the Project well (up to 80 feet of temporary drawdown has been recorded from a well-used for construction of a nearby solar project) during peak water demand during Project construction, the water levels in the Project well would be at least 150 feet above the Colorado River Accounting Surface. The water levels within the Project well would be monitored as part of the GMRMP (MM HWQ-4) per the DRECP LUPA Conservation and Management Action (CMA) Soil and Water (SW) 24. MM HWQ-3 ensures that the Project will not extract water from below the Accounting Surface, as it requires that pumping from Project wells be decreased or stopped well before water levels reached the Colorado River Accounting Surface.

**MM HWQ-4** **Groundwater Monitoring, Reporting, and Mitigation Plan (GMRMP).** Before the Project uses groundwater pumped from any Applicant owned and/or operated well (on site or off site) that extracts water from the CVGB, the Applicant shall retain a BLM-approved qualified hydrogeologist to develop a GMRMP, in coordination with the RWQCB and BLM, to ensure that groundwater wells surrounding Project supply well(s) are not adversely affected by Project activities, i.e., chronic lowering of groundwater levels and degradation of groundwater quality. The Applicant shall submit the GMRMP to the RWQCB and BLM for review and approval. Additionally, although no Groundwater Sustainability Agencies (GSAs) have been established for the CVGB, in the event that such agencies have been established when the GMRMP is developed, the Applicant also shall submit the GMRMP to those GSAs. The Applicant shall implement the approved GMRMP throughout any Project phase that pumps groundwater for consumptive use.

The GMRMP shall provide a detailed methodology for monitoring site groundwater levels and comparisons for levels within the CVGB including identification of the closest private wells to the Project's well(s). Groundwater level data from wells at adjacent and nearby solar facilities and other Projects on BLM-administered public lands shall be provided by the BLM for review and comparison, to the extent available to the Applicant. Monitoring shall be performed during pre-construction, construction, and operation of the Project, to establish pre-construction and Project-related groundwater level and water quality trends that can be quantitatively compared against observed and simulated trends near the Project's pumping well(s) and near potentially impacted existing wells. The GMRMP shall include a schedule for submittal of quarterly data reports by the Applicant to the

GMRMP designated agencies and the GSA(s) (if established), for the duration of the construction period. These quarterly data reports shall be prepared and submitted for review and shall include water level monitoring data and effect on the nearest off-site private wells. The designated agencies shall determine whether groundwater wells surrounding the Project supply well(s) are adversely affected (i.e., chronic lowering of groundwater levels and degradation of groundwater quality) by Project activities and, if so, shall require one or more of the following:

- Cessation or reduction of pumping at the Project well(s) until groundwater levels return to levels that allow nearby wells to resume pre-Project pumping levels;
- Compensation for whatever additional equipment is necessary to lower nearby pumps to levels that can adequately continue pumping;
- Compensation to repair or replace wells found to be damaged or inoperable due to lowered groundwater levels; or
- Compensation for increased energy cost due to Project-related well drawdown.

After the completion of construction, the Applicant and the BLM shall jointly evaluate the effectiveness of the GMRMP and determine if monitoring and reporting frequencies or procedures should be revised or eliminated.

**MM HWQ-5** **Project Drainage Plan.** The Applicant shall provide the RWQCB, Riverside County and BLM with a drainage plan for review and approval prior to construction, which includes the following information:

- Hydrologic assessment of flood discharges affecting each parcel.
- A detailed on-site hydraulic analysis utilizing FLO 2D or similar two-dimensional hydraulic model which models pre- and post-development flood conditions for the 10- and 100-year storm events. The post-development model must include all proposed Project features, contours, and drainage improvements. Graphical output must include depth and velocity mapping as well as mapping which graphically shows the changes in both parameters between the pre- and post-development conditions.
- The Drainage Plan shall show the location of all watercourses, drainage concentration points and drainage ditches as they enter, cross, and exit the site. It shall include pre-development and post-development peak flow estimates. It shall include hydraulic calculations to determine flood conditions, floodplain limits, flood depths and velocities. It shall show the relationship of drainage and flood features to the features of the Project, including buildings, fences, substations, access roads, culverts, linear features, and panel supports, demonstrating adequate design to protect from flooding, erosion and scour, and to do so without adversely affecting adjacent property, inducing erosion, or concentrating or diverting flows.
- The Plan shall show how drainage will be conveyed through the site without adversely affecting other property, either through increased flood hazard or increased potential for scour and erosion. Proposed fencing shall allow runoff to traverse the Project site unencumbered, as feasible. The Plan shall include an assessment of existing diversion berms and channels around parcel perimeters and the magnitude and frequency of flood that would be diverted by these existing features, and the probable integrity of these features to withstand flows. It shall show how those that are on the Project site will be affected by grading. It shall include an assessment of flows approaching pro-

posed perimeter fences, whether or not adjacent to existing berms, and make design recommendations to avoid flow diversions by these fences while taking into account relevant biological mitigation measures. Design recommendations may include creating fence openings large enough to allow the passage of debris-laden flows without the potential for diversions to other property.

- The Plan shall have detailed design of flood retention features necessary to avoid any increase in downstream flood peak flow rates.
- Drainage of Project Site Narrative – The Plan shall include a narrative of the measures necessary to protect the site and Project features from flooding, erosion and sedimentation, and measures taken to prevent Project-induced erosion and flooding of adjacent property.

**MM HWQ-6** **Flood Protection.** The O&M Building, BESS switchyard, and all other Project buildings shall either be situated outside of the 100-year floodplain or sufficiently protected against dislodgement by flooding where placement outside the floodplain is not practical. Flood protection shall consist of elevating the structures on fill to at least the highest anticipated adjacent flood level as measured from a horizontal stow position. Solar panels shall be situated at least one foot above the highest anticipated local flood level. All structures using posts or poles for foundations, including transmission poles or towers, shall be designed to protect against substantial scour from the 100-year flood event. The Project must comply with Riverside County Ordinance No. 458 for projects within a Special Flood Hazard Area or floodplain: electrical, heating, ventilation, plumbing, and air conditioning equipment and other service facilities must be designed or located to prevent water from entering or accumulating within the components during flooding.

# APPENDIX F-2: APPLICABILITY OF DRECP CONSERVATION AND MANAGEMENT ACTIONS

IP Easley I, LLC, IP Easley II, LLC, and IP Easley III, LLC (Applicant), has designed the Easley Renewable Energy Project (Project) to conform to the Desert Renewable Energy Conservation Plan (DRECP) Conservation and Management Actions (CMAs) to the maximum extent feasible and proposes to employ applicable construction- and operations-phase CMAs identified in the DRECP Record of decision (ROD) on U.S. Bureau of Land Management (BLM)–administered lands. Based on the identified location of the Project, CMAs under the DRECP that may be applicable to the solar Project include:

- *Land Use Plan Amendment (LUPA) Wide CMAs*, which are required for covered activities within the California Desert Conservation Area (CDCA) and DRECP plan area;
- *Development Focus Area (DFA) CMAs*, which are implemented in addition to LUPA-wide CMAs in the DFAs; and
- *Transmission CMAs*, which apply to transmission activities, including the Project's generation tie line;

The following DRECP CMAs would not be applicable to the Easley Project, because the Project would not be located on land under applicable designations:

- *Areas of Critical Environmental Concern (ACECs)*
- *Special Recreation Management Areas (SRMAs)*
- *California Desert National Conservation Lands*
- *Wildlife Allocations*
- *Extensive Recreation Management Areas (ERMAs)*
- *Unallocated BLM Land CMAs*

The following table lists the DRECP CMAs that would and would not be applicable to the proposed Project, and if appropriate, provides a brief explanation of why.

| LUPA Wide | | | | | |
|---|---|---|---|---|---|
| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Biological Resources** | **LUPA-BIO-1** | Conduct a habitat assessment (see Glossary of Terms) of Focus and BLM Special Status Species' suitable habitat for all activities and identify and/or delineate the DRECP vegetation types, rare alliances, and special features (e.g., Aeolian sand transport resources, Joshua tree, microphyll woodlands, carbon sequestration characteristics, seeps, climate refugia) present using the most current information, data sources, and tools (e.g., DRECP land cover mapping, aerial photos, DRECP species models, and reconnaissance site visits) to identify suitable habitat (see Glossary of Terms) for Focus and BLM Special Status Species. If required by the relevant species specific CMAs, conduct any subsequent protocol or adequate presence/absence surveys to identify species occupancy status and a more detailed mapping of suitable habitat to inform siting and design considerations. If required by relevant species specific CMAs, conduct analysis of percentage of impacts to suitable habitat and modeled suitable habitat.<br>■ BLM will not require protocol surveys in sites determined by the designated biologist to be unviable for occupancy of the species, or if baseline studies inferred absence during the current or previous active season.<br>Utilize the most recent and applicable assessment protocols and guidance documents for vegetation types and jurisdictional waters and wetlands that have been approved by BLM, and the appropriate responsible regulatory agencies, as applicable. | Yes | | Biological resources surveys have been conducted. Survey protocols and the Survey Work Plan for Focus and BLM Special-Status Species were performed in compliance with BLM protocols and coordination, as described in the Biological Resources Technical Report; therefore, the Project would comply with the CMA. |
| | **LUPA-BIO-2** | Designated biologist(s) (see Glossary of Terms), will conduct, and oversee where appropriate, activity-specific required biological monitoring during pre-construction, construction, and decommissioning to ensure that avoidance and minimization measures are appropriately implemented and are effective. The appropriate required monitoring will be determined during the environmental analysis and BLM approval process. The designated biologist(s) will submit monitoring reports directly to BLM. | Yes | | With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA. |
| **Resource Setback Standards** | **LUPA-BIO-3** | Resource setbacks (see Glossary of Terms) have been identified to avoid and minimize the adverse effects to specific biological resources. Setbacks are not considered additive and are measured as specified in the applicable CMA. Allowable minor incursions (see Glossary of Terms), as per specific CMAs do not affect the following setback measurement descriptions. Generally, setbacks (which range in distances for different biological resources) for the appropriate resources are measured from:<br>■ The edge of each of the DRECP desert vegetation types, including but not limited to those in the riparian or wetland vegetation groups (as defined by alliances within the vegetation type descriptions and mapped based on the vegetation type habitat assessments described in LUPA-BIO-1).<br>■ The edge of the mapped riparian vegetation or the Federal Emergency Management Agency (FEMA) 100-year floodplain, whichever is greater, for the Mojave River.<br>■ The edge of the vegetation extent for specified Focus and BLM sensitive plant species. | Yes | | Except for minor incursion by gen-tie and collector lines and access roadways, the Project would avoid desert dry wash woodland with the required 200-foot buffer under LUPA-BIO-RIPWET-1, as well as all other applicable resource setbacks. The Project will comply with this CMA. |

| LUPA Wide | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ■ The edge of suitable habitat or active nest substrates for the appropriate Focus and BLM Special Status Species. | | | |
| **Seasonal Restrictions** | **LUPA-BIO-4** | For activities that may impact Focus and BLM Special Status Species, implement all required species-specific seasonal restrictions on pre- construction, construction, operations, and decommissioning activities.<br>Species-specific seasonal restriction dates are described in the applicable CMAs.<br>Alternatively, to avoid a seasonal restriction associated with visual disturbance, installation of a visual barrier may be evaluated on a case-by-case basis that will result in the breeding, nesting, lambing, fawning, or roosting species not being affected by visual disturbance from construction activities subject to seasonal restriction. The proposed installation and use of a visual barrier to avoid a species seasonal restriction will be analyzed in the activity/project specific environmental analysis. | Yes | | Seasonal restrictions and requirements are specified in the species-specific CMAs and will be further specified in the required mitigation plans. The Project will comply with this CMA. |
| **Worker Education** | **LUPA-BIO-5** | All activities, as determined appropriate on an activity-by-activity basis, will implement a worker education program that meets the approval of the BLM. The program will be carried out during all phases of the project (site mobilization, ground disturbance, grading, construction, operation, closure/decommissioning or project abandonment, and restoration/reclamation activities). The worker education program will provide interpretation for non-English speaking workers, and provide the same instruction for new workers prior to their working on site. As appropriate based on the activity, the program will contain information about:<br>■ Site-specific biological and nonbiological resources.<br>■ Information on the legal protection for protected resources and penalties for violation of federal and state laws and administrative sanctions for failure to comply with LUPA CMA requirements intended to protect site-specific biological and nonbiological resources.<br>■ The required LUPA and project-specific measures for avoiding and minimizing effects during all project phases, including but not limited to resource setbacks, trash, speed limits, etc.<br>■ Reporting requirements and measures to follow if protected resources are encountered, including potential work stoppage and requirements for notification of the designated biologist.<br>■ Measures that personnel can take to promote the conservation of biological and nonbiological resources. | Yes | | With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA. |
| **Subsidized Predators Standards** | **LUPA-BIO-6** | Subsidized predator standards, approved by BLM, in coordination with the USFWS and CDFW, will be implemented during all appropriate phases of activities, including but not limited to renewable energy activities, to manage predator food subsidies, water subsidies, and breeding sites including the following:<br>■ Common Raven management actions will be implemented for all activities to address food and water subsidies and roosting and nesting sites specific to the Common Raven. These include identification of monitoring reporting procedures | Yes | | A Raven Management Plan (POD Appendix J) will detail methods to implement subsidizing predator standards in accordance with LUPA-BIO-6 and will meet requirements established by the USFWS and |

| LUPA Wide | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | and requirements; strategies for refuse management; as well as design strategies and passive repellant methods to avoid providing perches, nesting sites, and roosting sites for Common Ravens.<br>■ The application of water and/or other palliatives for dust abatement in construction areas and during project operations and maintenance will be done with the minimum amount of water necessary to meet safety and air quality standards and in a manner that prevents the formation of puddles, which could attract wildlife and wildlife predators.<br>■ Following the most recent national policy and guidance, BLM will take actions to not introduce, dispose of, or release any non- native species into areas of native habitat, suitable habitat, and natural or artificial waterways/water bodies containing native species.<br>All activity work areas will be kept free of trash and debris. Particular attention will be paid to "micro-trash" (including such small items as screws, nuts, washers, nails, coins, rags, small electrical components, small pieces of plastic, glass or wire, and any debris or trash that is colorful or shiny) and organic waste that may subsidize predators. All trash will be covered, kept in closed containers, or otherwise removed from the project site at the end of each day or at regular intervals prior to periods when workers are not present at the site.<br>■ In addition to implementing the measures above on activity sites, each activity will provide compensatory mitigation that contributes to LUPA-wide raven management. | | | CDFW. The Project will comply with this CMA. |
| **Restoration of Areas Disturbed by Construction Activities But Not Converted by Long-Term Disturbance** | **LUPA-BIO-7** | Where DRECP vegetation types or Focus or BLM Special Status Species habitats may be affected by ground- disturbance and/or vegetation removal during pre-construction, construction, operations, and decommissioning related activities but are not converted by long-term (i.e., more than two years of disturbance, see Glossary of Terms) ground disturbance, restore these areas following the standards, approved by BLM authorized officer, following the most recent BLM policies and procedures for the vegetation community or species habitat disturbance/impacts as appropriate, summarized below:<br>■ Implement site-specific habitat restoration actions for the areas affected including specifying and using:<br>○ The appropriate seed (e.g., certified weed- free, native, and locally and genetically appropriate seed)<br>○ Appropriate soils (e.g., topsoil of the same original type on site or that was previously stored by soil type after being salvaged during excavation and construction activities)<br>○ Equipment<br>○ Timing (e.g., appropriate season, sufficient rainfall)<br>○ Location<br>○ Success criteria<br>○ Monitoring measures | Yes | | The solar and energy storage facility will avoid desert dry wash woodland with a 200-foot buffer. A Revegetation and Salvage Plan (POD Appendix L) will be prepared to address habitat restoration, local genetically appropriate seed, and cacti and crucifixion thorn salvage, as needed. The Project will comply with this CMA. |

| LUPA Wide | | | | | |
|---|---|---|---|---|---|
| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ○ Contingency measures, relevant for restoration, which includes seeding that follows BLM policy when on BLM administered lands.<br>■ Salvage and relocate cactus, nolina, and yucca from the site prior to disturbance using BLM protocols. To the maximum extent practicable for short-term disturbed areas (see Glossary of Terms), the cactus and yucca will be re-planted back to the original site.<br>■ Restore and reclaim short-term (i.e. 2 years or less, see Glossary of Terms) disturbed areas, including pipelines, transmission projects, staging areas, and short-term construction-related roads immediately or during the most biologically appropriate season as determined in the activity/project specific environmental analysis and decision, following completion of construction activities to reduce the amount of habitat converted at any one time and promote recovery to natural habitats and vegetation as well as climate refugia and ecosystem services such carbon storage. | | | |
| **General Closure and Decommissioning Standards** | **LUPA-BIO-8** | All activities that are required to close and decommission the site (e.g., renewable energy activities) will specify and implement project-specific closure and decommissioning actions that meet the approval of BLM, and that at a minimum address the following:<br>■ Specifying and implementing the methods, timing (e.g., criteria for triggering closure and decommissioning actions), and criteria for success (including quantifiable and measurable criteria).<br>■ Recontouring of areas that were substantially altered from their original contour or gradient and installing erosion control measures in disturbed areas where potential for erosion exists.<br>■ Restoring vegetation as well as soil profiles and functions that will support and maintain native plant communities, associated carbon sequestration and nutrient cycling processes, and native wildlife species.<br>■ Vegetation restoration actions will identify and use native vegetation composition, native seed composition, and the diversity to values commensurate with the natural ecological setting and climate projections. | Yes | | A draft Closure and Decom-missioning Plan has been developed (POD Appendix Y). The decommissioning plan will be finalized when the Project is near the end of its permit. The Project will comply with this CMA. |
| **Water and Wetland Dependent Species Resources** | **LUPA-BIO-9** | ■ Implement the following general LUPA CMA for water and wetland dependent resources<br>■ Implement construction site standard practices to prevent toxic chemicals, hazardous materials, and other fluids from entering vegetation type streams, washes, and tributary networks through water runoff, erosion, and sediment transport by, at a minimum, implementing the following:<br>○ On project sites, vehicles and other equipment will be maintained in proper working condition and only stored in designated containment areas where runoff is collected or controlled and that are located outside of streams, | Yes | | The Applicant will adhere to the specifics in the Hazardous Materials Management and Oil Spill Response Plan (POD Appendix W). Coupled with implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA. |

| Category | CMA # | CMA Text | Applica-bility | Explanation: Why CMA is not applicable | Comments |
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| | | washes, and distributary networks to minimize accidental fluids and hazardous materials spills.<br>○ Hazardous material leaks, spills, or releases will be immediately cleaned and equipment will be repaired upon identification. Removal and disposal of spill and related clean-up materials will occur at an approved off-site landfill.<br>○ Maintenance and operations vehicles will carry the appropriate equipment and materials to isolate, clean up, and repair any hazardous material leaks, spills, or releases.<br>■ Activity-specific drainage, erosion, and sedimentation control actions, which meet the approval of BLM and the applicable regulatory agencies, will be carried out during all appropriate phases of the approved project. These actions, as needed, will address measures to ensure the proper protection of water quality, site-specific stormwater and sediment retention, and design of the project to minimize site disturbance, including the following:<br>○ Identify site-specific surface water runoff patterns and implement measures to prevent excessive and unnatural soil deposition and erosion.<br>○ Implement measures to maintain natural drainages and to maintain hydrologic function in the event drainages are disturbed.<br>○ Reduce the amount of area covered by impervious surfaces through use of permeable pavement or other pervious surfaces. Direct runoff from impervious surfaces into retention basins.<br>○ Stabilize disturbed areas following grading in the manner appropriate to the soil type so that wind or water erosion is minimized.<br>○ Minimize irrigation runoff by using low or no irrigation native vegetation landscaping for landscaped retention basins.<br>○ Conduct regular inspections and maintenance of long-term erosion control measures to ensure long-term effectiveness.<br>○ Project applicants for sites that may affect intermittent and perennial streams, springs, swales, ephemeral washes, wetland vegetation, other DRECP water land covers, or sites occupied by aquatic or riparian Focus and BLM Special Status Species due to groundwater or surface water extraction will conduct hydrologic studies during project planning to determine the potential effect of groundwater and surface water extraction on the hydrologic unit. These studies will include both watershed effects as well as effects on perched, alluvial, and regional aquifers. Projects that are likely to affect ground-water resources in a manner that would result in substantial loss of riparian or wetland communities or habitat for riparian or aquatic Focus and BLM Special Status Species are prohibited.<br>○ The use of evaporation ponds for water management will be avoided when the water could harm birds or other terrestrial wildlife due to constituents | | | |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | of concern present in the wastewater (e.g., selenium, hypersalinity, etc.). Evaporation ponds will be configured to minimize attractiveness to shorebirds (e.g., maintain water depths over two feet; maintain steep slopes along edge; enclose evaporation ponds in long-term structures; or obscure evaporation ponds from view using materials that blend in with the natural surroundings).<br>■ Ramps that allow the egress of wildlife from ponds or other water management infrastructure will be installed. | | | |
| **Standard Practices for Weed Management** | **LUPA-BIO-10** | Consistent with BLM state and national policies and guidance, integrated weed management actions, will be carried out during all phases of activities, as appropriate, and at a minimum will include the following:<br>■ Thoroughly clean the tires and undercarriage of vehicles entering or reentering the project site to remove potential weeds.<br>■ Store project vehicles on site in designated areas to minimize the need for multiple washings whenever vehicles re-enter the project site.<br>■ Properly maintain vehicle wash and inspection stations to minimize the introduction of invasive weeds or subsidy of invasive weeds.<br>■ Closely monitor the types of materials brought onto the site to avoid the introduction of invasive weeds and non-native species.<br>■ Reestablish native vegetation quickly on disturbed sites.<br>■ Monitor and quickly implement control measures to ensure early detection and eradication of weed invasions to avoid the spread of invasive weeds and non-native species on site and to adjacent off-site areas.<br>■ Use certified weed-free mulch, straw, hay bales, or equivalent fabricated materials for installing sediment barriers. | Yes | | With the implementation of mitigation measures to be developed during the NEPA process, and as described in the Vegetation Management Plan (POD Appendix O) and Integrated Weed Management Plan (POD Appendix N), the Project will comply with this CMA. |
| **Nuisance Animals and Invasive Species** | **LUPA-BIO-11** | Implement the following CMAs for controlling nuisance animals and invasive species:<br>■ No fumigant, treated bait, or other means of poisoning nuisance animals including rodenticides will be used in areas where Focus and BLM Special Status Species are known or suspected to occur.<br>■ Manage the use of widely spread herbicides and do not apply herbicides effective against dicotyledonous plants within 1,000 feet from the edge of a 100-year floodplain, stream and wash channels, and riparian vegetation or to soils less than 25 feet from the edge of drains. Exceptions will be made when targeting the base and roots of invasive riparian species such as tamarisk and Arundo donax (giant reed). Manage herbicides consistent with the most current national and California BLM policies.<br>■ Minimize herbicide, pesticide, and insecticide treatment in areas that have a high risk for groundwater contamination. | Yes | | The Applicant will apply to BLM for a Pesticide Use Permit prior to application of any pesticides on the Project site. In addition, with implementation of biological resources mitigation measures to be developed during the NEPA process, the Project will control nuisance animals and invasive species and comply with this CMA. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ▪ Clean and dispose of pesticide containers and equipment following professional standards. Avoid use of pesticides and cleaning containers and equipment in or near surface or subsurface water.<br>▪ When near surface or subsurface water, restrict pesticide use to those products labeled safe for use in/near water and safe for aquatic species of animals and plants. | | | |
| **Noise** | **LUPA-BIO-12** | For activities that may impact Focus or BLM Special Status Species**,** implement the following LUPA CMA for noise:<br>▪ To the extent feasible, and determined necessary by BLM to protect Focus and BLM sensitive wildlife species, locate stationary noise sources that exceed background ambient noise levels away from known or likely locations of and BLM sensitive wildlife species and their suitable habitat.<br>▪ Implement engineering controls on stationary equipment, buildings, and work areas including sound-insulation and noise enclosures to reduce the average noise level, if the activity will contribute to noise levels above existing background ambient levels.<br>▪ Use noise controls on standard construction equipment including mufflers to reduce noise | Yes | | The only potential stationary noise source would be the battery energy storage system units, depending on technology. IP Easley, LLC, will implement noise control as appropriate with implementation of noise mitigation measures to be developed during the NEPA process. The Project will comply with this CMA. |
| **General Siting and Design** | **LUPA-BIO-13** | Implement the following CMA for project siting and design<br>▪ To the maximum extent practicable site and design projects to avoid impacts to vegetation types, unique plant assemblages, climate refugia as well as occupied habitat and suitable habitat for Focus and BLM Special Status Species (see "avoid to the maximum extent practicable" in Glossary of Terms).<br>▪ The siting of projects along the edges (i.e. general linkage border) of the biological linkages identified in Appendix D (Figures D-1 and D-2) will be configured (1) to maximize the retention of microphyll woodlands and their constituent vegetation type and inclusion of other physical and biological features conducive to Focus and BLM Special Status Species' dispersal, and (2) informed by existing available information on modeled focus and BLM Special Status Species habitat and element occurrence data, mapped delineations of vegetation types, and based on available empirical data, including radio telemetry, wildlife tracking sign, and road-kill information. Additionally, projects will be sited and designed to maintain the function of F Special Status Species connectivity and their associated habitats in the following linkage and connectivity areas:<br>o Within a 5-mile-wide linkage across Interstate 10 centered on Wiley's Well Road to connect the Mule and McCoy mountains (the majority of this linkage is within the Chuckwalla ACEC and Mule-McCoy Linkage ACEC) .<br>o Within a 3-mile-wide linkage across Interstate 10 to connect the Chuckwalla and Palen mountains. | Yes | | The Easley Project will avoid impacts to unique plant assemblages and climate refugia to the maximum extent practicable. That is, the solar and energy storage facility will avoid desert dry wash woodland with a 200-foot buffer and it is not located within a listed wildlife connectivity corridor. The Project will comply with this CMA.A portion of the northwesternmost of the Project site overlaps a multi-species linkage area that runs between Joshua Tree National Park and is already impacted by Desert Harvest, Desert Sunlight, and existing agriculture in the area. Also, the eastern end of the 500 kV gen-tie line into the Oberon Project Substation overlaps the 1.5-mile-wide linkage to connect the Chuckwalla Mountains and |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ○ Within a 1.5-mile-wide linkage across Interstate 10 to connect the Chuckwalla Mountains to the Chuckwalla Valley east of Desert Center.<br>○ The confluence of Milpitas Wash and Colorado River floodplain within 2 miles of California State Route 78 (this linkage is entirely within the Chuckwalla ACEC) .<br>■ Delineate the boundaries of areas to be disturbed using temporary construction fencing and flagging prior to construction and confine disturbances, project vehicles, and equipment to the delineated project areas to protect vegetation types and focus and BLM Special Status Species.<br>■ Long-term nighttime lighting on project features will be limited to the minimum necessary for project security, safety, and compliance with Federal Aviation Administration requirements and will avoid the use of constant-burn lighting.<br>■ All long-term nighttime lighting will be directed away from riparian and wetland vegetation, occupied habitat, and suitable habitat areas for Focus and BLM Special Status Species. Long- term nighttime lighting will be directed and shielded downward to avoid interference with the navigation of night-migrating birds and to minimize the attraction of insects as well as insectivorous birds and bats to project infrastructure.<br>■ To the maximum extent practicable (see Glossary of Terms), restrict construction activity to existing roads, routes, and utility corridors to minimize the number and length/size of new roads, routes, disturbance, laydown, and borrow areas.<br>■ To the maximum extent practicable (see Glossary of Terms), confine vehicular traffic to designated open routes of travel to and from the project site, and prohibit, within project boundaries, cross- country vehicle and equipment use outside of approved designated work areas to prevent unnecessary ground and vegetation disturbance.<br>■ To the maximum extent practicable(see Glossary of Terms) , construction of new roads and/or routes will be avoided within Focus and BLM Special Status Species suitable habitat within identified linkages for those Focus and BLM Special Status Species, unless the new road and/or route is beneficial to minimize net impacts to natural or ecological resources of concern. These areas will have a goal of “no net gain” of project roads and/or routes<br>■ To the maximum extent practicable (see Glossary of Terms), any new road and/or route considered within Focus and BLM Special Status Species suitable habitat within identified linkages for those Focus and BLM Special Status Species will not be paved so as not to negatively affect the function of identified linkages.<br>■ Use nontoxic road sealants and soil stabilizing agents. | | | the Chuckwalla Valley; however, operation of a gen-tie line would not impede wildlife movement. The Applicant will coordinate with the BLM and develop mitigation measures during the NEPA process, as needed, to ensure that the connectivity function and associated habitat including microphyll woodland in these areas will be maintained during construction. Long-term night lighting would be minimized to the maximum extent feasible and coordinated with the BLM. Project disturbance areas will be flagged prior to construction. The Project will use existing roads and shared infrastructure where feasible. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Biology: General Standard Practices** | **LUPA-BIO-14** | Implement the following general standard practices to protect Focus and BLM Special Status Species:<br>■ Feeding of wildlife, leaving of food or trash as an attractive nuisance to wildlife, collection of native plants, or harassing of wildlife on a site is prohibited.<br>■ Any wildlife encountered during the course of an activity, including construction, operation, and decommissioning will be allowed to leave the area unharmed.<br>■ Domestic pets are prohibited on sites. This prohibition does not apply to the use of domestic animals (e.g., dogs) that may be used to aid in official and approved monitoring procedures/protocols, or service animals (dogs) under Title II and Title III of the American with Disabilities Act.<br>■ All construction materials will be visually checked for the presence of wildlife prior to their movement or use. Any wildlife encountered during the course of these inspections will be allowed to leave the construction area unharmed.<br>■ All steep-walled trenches or excavations used during the project will be covered, except when being actively used, to prevent entrapment of wildlife. If trenches cannot be covered, they will be constructed with escape ramps, following up-to-date design standards to facilitate and allow wildlife to exit, or wildlife exclusion fencing will be installed around the trench(s) or excavation(s). Open trenches or other excavations will be inspected by a designated biologist immediately before backfilling, excavation, or other earthwork.<br>■ Minimize natural vegetation removal through implementation of crush and drive or cut or mow vegetation rather than removing entirely. | Yes | | As described in the Plan of Development and with the implementation of biological resources mitigation measures to be developed during the NEPA process, the Project will comply with this CMA. |
| | **LUPA-BIO-15** | Use state-of-the-art, as approved by BLM, construction and installation techniques, appropriate for the specific activity/project and site, that minimize new site disturbance, soil erosion and deposition, soil compaction, disturbance to topography, and removal of vegetation. | Yes | | Within the application area, the project has been designed to minimize impacts to sensitive habitat and resources to the extent feasible. With the implementation of biological resources mitigation measures to be developed during the NEPA process, the Project will comply with this CMA. |
| **Activity-Specific Bird and Bat CMAs** | **LUPA-BIO-16** | For activities that may impact Focus and BLM sensitive birds, protected by the ESA and/or Migratory Bird Treaty Act of 1918, and bat species, implement appropriate measures as per the most up-to-date BLM state and national policy and guidance, and data on birds and bats, including but not limited to activity specific plans and actions. The goal of the activity -specific bird and bat actions is to avoid and minimize direct mortality of birds and bats from the construction, operation, maintenance, and decommissioning of the specific activities. | Yes | | Portions of the 34.5 kV medium voltage collector lines may be installed underground, and project design will reduce effects to birds and bats to the maximum extent feasible. A Project-specific Bird and Bat Conservation Strategy (BBCS), including a Nesting Bird |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | Activity-specific measures to avoid and minimize impacts may include, but are not limited to:<br>■ Siting and designing activities will avoid high bird and bat movement areas that separate birds and bats from their common nesting and roosting sites, feeding areas, or lakes and rivers.<br>■ For activities that impact bird and bat Focus and BLM Special Status Species, during project siting and design, conducting monitoring of bird and bat presence as well as bird and bat use of the project site using the most current survey methods and best procedures available at the time.<br>■ Reusing or co-locating new transmission facilities and other ancillary facilities with existing facilities and disturbed areas to reduce habitat destruction and avoid additional collision risks.<br>■ Reducing bird and bat collision hazards by utilizing techniques such as unguyed monopole towers or tubular towers. Where the use of guywires is unavoidable, demarcate guywires using the best available methods to minimize avian species strikes.<br>■ When fencing is necessary, use bird and bat compatible design standards.<br>■ Using lighting that does not attract birds and bats or their prey to project sites including using non-steady burning lights (red, dual red and white strobe, strobe-like flashing lights) to meet Federal Aviation Administration requirements, using motion or heat sensors and switches to reduce the time when lights are illuminated, using appropriate shielding to reduce horizontal or skyward illumination, and avoiding the use of high-intensity lights (e.g., sodium vapor, quartz, and halogen).<br>■ Implementing a robust monitoring program to regularly check for wildlife carcasses, document the cause of mortality, and promptly remove the carcasses.<br>■ Incorporating a bird and bat use and mortality monitoring program during operations using current protocols and best procedures available at time of monitoring | | | Management Plan, is included in POD Appendix M. The Project will comply with this CMA. |
| **Activity-Specific Bird and Bat CMAs** | **LUPA-BIO-17** | For activities that may result in mortality to Focus and BLM Special–Status bird and bat species, a Bird and Bat Conservation Strategy (BBCS) will be prepared with the goal of assessing operational impacts to bird and bat species and incorporating methods to reduce documented mortality. The BBCS actions for impacts to birds and bats during these activities will be determined by the activity-specific bird and bat operational actions. The strategy shall be approved by BLM in coordination with USFWS, and CDFW as appropriate, and may include, but is not limited to:<br>■ Incorporating a bird and bat use and mortality monitoring program during operations using current protocols and best procedures available at time of monitoring. | Yes | | A draft Project-specific Bird and Bat Conservation Strategy (BBCS) is included in POD Appendix M and with imple-mentation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA. |

| Category | CMA # | CMA Text | Applica-bility | Explanation: Why CMA is not applicable | Comments |
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| | | ■ Activity-specific operational avoidance and minimization actions that reduce the level of mortality on the populations of bird and bat species, such as:<br>○ Use techniques that minimize attraction of birds to hazardous situations that are mistaken to be or simulate natural habitats (e.g., bodies of water).<br>○ Implement operational management techniques that minimize impacts to migratory birds during diurnal and seasonal cycles (e.g., positioning of heliostats to decrease surface area exposed to avian species).<br>○ Evaluation and installation of the best available bird and bat detection and deterrent technologies available at the time of construction.<br>Known important Focus and BLM Special Status bird areas are:<br>■ Dry lakes and playas of the north Mojave region, which include China Lake, Koehn Lake, Harper Lake, and Searles Lake (as shown in the Audubon Important Bird Areas in Appendix D)<br>■ Antelope Valley (as shown in the Audubon Important Bird Areas in Appendix D)<br>■ Lower Colorado River Valley (as shown in the Audubon Important Bird Areas in Appendix D)<br>■ The Salton Sea and bordering areas including agricultural land of the Imperial Valley (as shown in the Audubon Important Bird Areas in Appendix D)<br>■ Documented avian movement corridors along the north slope of the San Gabriel and San Bernardino mountain ranges<br>■ Other regionally important seasonal use areas and migratory corridors identified in future studies or otherwise documented in the scientific literature over the term of the LUPA<br>The following provides the DRECP vegetation type, and Focus and BLM Special Status Species biological CMAs to be implemented throughout the LUPA Decision Area.<br>**Riparian and Wetland Vegetation Types and Associated Species (RIPWET)**<br><u>Riparian Vegetation Types</u><br>■ Madrean Warm Semi-Desert Wash Woodland/Scrub<br>■ Mojavean Semi-Desert Wash Scrub<br>■ Sonoran-Coloradan Semi-Desert Wash Woodland/Scrub<br>■ Southwestern North American Riparian Evergreen and Deciduous Woodland<br>■ Southwestern North American Riparian/Wash Scrub<br><u>Wetland Vegetation Types</u><br>■ Arid west freshwater emergent marsh<br>■ Californian Warm Temperate Marsh/Seep<br>■ North American Warm Desert Alkaline Scrub and Herb Playa and Wet Flat<br>■ Southwestern North American Salt Basin and High Marsh | | | |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | Riparian and Wetland Bird Focus Species<br>■ Willow Flycatcher<br>■ Southwestern Willow Flycatcher<br>■ Least Bell's Vireo<br>■ Western Yellow-billed Cuckoo<br>■ Yuma Clapper Rail<br>■ California Black Rail<br>■ Tricolored Blackbird<br><br>Fish Focus Species<br>■ Desert pupfish<br>■ Mohave Tui Chub<br>■ Owens Tui Chub<br>■ Owens Pupfish | | | |
| **Other Riparian & Wetland Focus Species: Tehachapi Slender Salamander** | **LUPA-BIO-RIPWET-1** | The riparian and wetland DRECP vegetation types and other features listed in **Table 17** will be avoided to the maximum extent practicable, except for allowable minor incursions (see Glossary of Terms for "avoidance to the maximum extent practicable" and "minor incursion") with the specified setbacks.<br><br>For minor incursion (see "minor incursion" in the Glossary of Terms) to the DRECP riparian vegetation types, wetland vegetation types, or encroachments on the setbacks listed in **Table 17**, the hydrologic function of the avoided riparian or wetland communities will be maintained.<br><br>■ Minor incursions in the riparian and wetland vegetation types or other features including the setbacks listed in **Table 17** will occur outside of the avian nesting season, February 1 through August 31 or otherwise determined by BLM, USFWS and CDFW if the minor incursion(s) is likely to result in impacts to nesting birds. | Yes | | The riparian vegetation type on the Easley site is Sonoran-Coloradan Semi-Desert Wash Woodland (mapped as desert dry wash woodland). It will be avoided to the maximum extent feasible on BLM-administered lands with the exception of allowable minor incursion (see Glossary of Terms). Hydrologic function will be maintained. The Project will comply with this CMA. |
| | **LUPA-BIO-RIPWET-2** | Hydrologic function of the following DRECP vegetation types will be maintained: North American Warm Desert Alkaline Scrub and Herb Playa and Wet Flat, Southwestern North American Salt Basin and High Marsh, and other undifferentiated wetland-related land covers (i.e., "Playa," "Wetland," and "Open Water"). | No | Resource not found on the project site | None of these vegetation types are present on the Easley site. |
| **BLM Special Status Riparian Bird Species** | **LUPA-BIO-RIPWET-3** | For activities that occur within 0.25 mile of a riparian or wetland DRECP vegetation type and may impact BLM Special Status riparian and wetland birds species, conduct a pre-construction/activity nesting bird survey for BLM Special Status riparian and wetland birds according to agency-approved protocols.<br><br>■ Based on the results of the nesting bird survey above, setback activities that are likely to impact BLM Special Status riparian and wetland bird species, including but not limited to pre-construction, construction and decommissioning, 0.25 mile from active nests Special Status during the breeding season (February 1 through August 31 or otherwise determined by BLM, USFWS and CDFW). For activities in areas covered by this provision that occur during the breeding season and that last longer than one week, nesting bird surveys may need to be repeated, as determined by BLM, in coordination with USFWS and CDFW, as appropriate. No pre- | Yes | | The Applicant will perform a pre-construction/activity nesting bird survey and will establish setbacks as necessary. With implementation of mitigation measures to be developed during the NEPA process and the Project-specific Bird and Bat Conservation Strategy (POD Appendix M), the Project will comply with this CMA. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | activity nesting bird surveys are necessary for activities occurring outside of the breeding season. | | | |
| **Federally Listed Fish Species** | **LUPA-BIO-RIPWET-4** | Setback pre-construction, construction, and decommissioning activities and other activities that may impact federally listed fish species, 0.25 mile from the edge of existing or newly discovered occurrences of federally listed fish species, except for minor incursions (see Glossary of Terms).<br>■ Demonstrate neutral or beneficial long-term hydrologic effects on federally listed fish species and the adjoining riparian and wetland habitat prior to seeking authorization for and commencing a minor incursion. | No | Resource not found on the project site | There are no fish species in the Project area or within 0.25 miles. |
| | **LUPA-BIO-RIPWET-5** | Site and design activities to fully avoid operational impacts to existing and newly discovered occurrences of federally listed fish species. | No | Resource not found on the project site | There are no fish species in the Project area. |
| **Tehachapi Slender Salamander** | **LUPA-BIO-RIPWET-6** | Avoid pre-construction, construction, and decommissioning activities or other activities that may impact the Tehachapi slender salamander within 0.25 mile of existing or newly discovered occurrences of or suitable habitat for Tehachapi slender salamander, except for minor incursions (see Glossary of Terms). | No | Project not within the range or habitat of this species. | The Project area does not include Tehachapi slender salamander or their habitat. |
| | **LUPA-BIO-RIPWET-7** | Construct culverts or other suitable below-grade crossings for new or improved roadways that bisect suitable habitat for the Tehachapi Slender Salamander.<br>■ Construct barriers to reduce at-grade crossings along new or improved roadways that bisect suitable habitat. | No | Project not within the range or habitat of this species. | The Project area does not include Tehachapi slender salamander or their habitat. |
| **Dune DRECP Vegetation Types, Aeolian Processes and Associated Species (DUNE): Aeolian Processes** | **LUPA-BIO-DUNE-1** | Because DRECP sand dune vegetation types and Aeolian sand transport corridors are, by definition, shifting resources, activities that potentially occur within or bordering the sand dune DRECP vegetation types and/or Aeolian sand transport corridors must conduct studies to verify the location [refer to Appendix D, Figure D-7] and extent of the sand resource(s) for the activity-specific environmental analysis to determine:<br>■ Whether the proposed activity(s) occur within a sand dune or an Aeolian sand transport corridor<br>■ If the activity(s) is subject to dune/Aeolian sand transport corridor CMAs<br>■ If the activity(s) needs to be reconfigured to satisfy applicable avoidance requirements | No | Resource not found on the project site | There is no sand dune habitat or suitable habitat for sand-dependent species on the Easley site. |
| | **LUPA-BIO-DUNE-2** | Activities that potentially affect the amount of sand entering or transported within Aeolian sand transport corridors will be designed and operated to:<br>■ Maintain the quality and function of Aeolian transport corridors and sand deposition zones, unless related to maintenance of existing [at the time of the DRECP LUPA ROD] facilities/operations/activities<br>■ Avoid a reduction in sand-bearing sediments within the Aeolian system<br>■ Minimize mortality to DUNE associated Focus and BLM Special Status Species | No | Resource not found on the project site | There are no sand dune habitats or sand transport corridors on the Easley site. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-BIO-DUNE-3** | Any facilities or activities that alter site hydrology (e.g., sediment barrier) will be designed to maintain continued sediment transport and deposition in the Aeolian corridor in a way that maintains the Aeolian sorting and transport to downwind deposition zones. Site designs for maintaining this transport function must be approved by BLM in coordination with USFWS and CDFW as appropriate. | No | Resource not found on the project site | The Project is not located in an Aeolian corridor and it would be designed to allow sheet flow through the Project, maintaining the site hydrology and sediment transport to the maximum extent feasible. |
| **Mohave Fringe-Toed Lizard** | **LUPA-BIO-DUNE-4** | Dune formations and other sand accumulations (i.e., sand ramps, sand sheets) with suitable habitat characteristics for the Mojave fringe-toed lizard (i.e., unconsolidated blow-sand) will be mapped according to mapping standards established by the BLM National Operations Center.<br>For minor incursions (see "minor incursion" in the Glossary of Terms) into sand dunes and sand transport areas the activity will be sited in the mapped zone with the least impacts to sand dunes and sand transport and Mojave fringe-toed lizards. | No | Resource not found on the project site | There are no sand dune formations on the Easley site. There is no Mojave fringe-toed lizard modeled habitat on the site. |
| | **LUPA-BIO-DUNE-5** | If suitable habitat characteristics are identified during the habitat assessment, clearance surveys (see Glossary of Terms) for Mojave fringe-toed lizard will be performed in suitable habitat areas.<br>The following CMAs will be implemented for bat Focus and BLM Special Status Species, including but not limited to those listed below:<br>■ California Leaf-nosed Bat<br>■ Pallid Bat<br>■ Townsend's Big-eared Bat | No | Project not within the range or habitat of this species. | The Project site does not include habitat for Mojave fringe-toed lizards |
| **Bat Species (BAT)** | **LUPA-BIO-BAT-1** | Activities, except wind projects, will not be sited within 500 feet of any occupied maternity roost or presumed occupied maternity roost as described below. Refer to CMA **DFA-VPL-BIO-BAT-1** for distances within DFAs and VPLs. | Yes | | No active bat maternity roosts have been identified within the survey area; no caves or similar roosting habitat occurs on or near the site. The Project will comply with this CMA. |
| | **LUPA-BIO-BAT-2** | Mines will be assumed to be occupied bat roosts, unless appropriate surveys for bat use have been conducted during all seasons (including maternity, lekking or swarming, and winter use). Mines not considered potential bat roosts are only those that have no structure/workings (adits or shafts or crevices out of view).<br>The following CMAs will be implemented for all plant Focus and BLM Special Status Species, including but not limited to those listed below<br>■ Alkali mariposa-lily<br>■ Bakersfield cactus<br>■ Barstow woolly sunflower<br>■ Desert cymopterus<br>■ Little San Bernardino Mountains linanthus<br>■ Mojave monkeyflower<br>■ Mojave tarplant | No | Resource not found on the project site | There are no mines on or within 500 feet of the Project site, as dictated in CMA LUPA-BIO-BAT-1. Mines that occur within the Project vicinity with records of bat roosts are approximately 20-30 miles away in the McCoy Mountains, the Little Maria Mountains, and the Pinto Mountains |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ▪ Owens Valley checkerbloom<br>▪ Parish's daisy<br>▪ Triple-ribbed milk-vetch | | | |
| **Plant Species (PLANT): Plant Focus and BLM Special Status Species CMAs** | **LUPA-BIO-PLANT-1** | Conduct properly timed protocol surveys in accordance with the BLM's most current (at time of activity) survey protocols for plant Focus and BLM Special Status Species. | Yes | | Protocol surveys have been completed. The methodologies and results are included in the Biological Resources Technical Report. The Project will comply with this CMA. |
| | **LUPA-BIO-PLANT-2** | Implement an avoidance setback of 0.25 mile for all Focus and BLM Special Status Species occurrences. Setbacks will be placed strategically adjacent to occurrences to protect ecological processes necessary to support the plant Species (see Appendix Q, Baseline Biology Report, in the Proposed LUPA and Final EIS [2015], or the most recent data and modeling). | No | Resource not found on the project site | No Focus or BLM Special Status Plant Species were observed, as is documented in the Biological Resources Technical Report. |
| | **LUPA-BIO-PLANT-3** | Impacts to suitable habitat for Focus and BLM Special Status plant species should be avoided to the extent feasible, and are limited [capped] to a maximum of 1% of their suitable habitat throughout the entire LUPA Decision Area. The baseline condition for measuring suitable habitat is the DRECP modeled suitable habitat for these species utilized in the EIS analysis (2014 and 2015), or the most recent suitable habitat modeling.<br>▪ For those plants with Species Specific DFA Suitable Habitat Impact Caps listed in **Table 23**, those caps apply in the DFAs only. Refer to CMA DFA-PLANT-1. | No | Resource not found on the project site | None of the plant species identified in Table 23 have potential to occur on the Project site or in the vicinity. The Project will not affect suitable habitat for any of these species. |
| **Special Vegetation Features (SVF)** | **LUPA-BIO-SVF-1** | For activity-specific NEPA analysis, a map delineating potential sites and habitat assessment of the following special vegetation features is required: Yucca clones, creosote rings, Saguaro cactus, Joshua tree woodland, microphyll woodland, Crucifixion thorn stands. BLM guidelines for mapping/surveying cactus, yuccas, and succulents shall be followed. | Yes | | Protocol surveys have been performed, which mapped these features as observed within the survey area, including desert dry wash microphyll woodland and creosote rings. No Joshua tree woodland, Saguaro cactus, or crucifixion thorn stands with greater than 100 individuals were found. The survey results and mapping are included in the Biological Resources Technical Report. The Project will comply with this CMA. |
| | **LUPA-BIO-SVF-2** | Yucca clones larger than 3 meters in diameter (longest diameter if the clone forms an ellipse rather than a circular ring) shall be avoided. | No | Resource not found on the project site | Protocol surveys have been performed for the Easley Project and no yucca clones larger than 3 meters were found onsite. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-BIO-SVF-3** | Creosote bush rings (see Glossary of Terms) larger than 5 meters in diameter (longest diameter if the "ring" forms an ellipse rather than a circle) shall be avoided. | No | Resource not found on the project site | No creosote bush rings larger than 5 meters in diameter were observed during the biological resources surveys. |
| | **LUPA-BIO-SVF-4** | Saguaro cactus should be managed in such a way as to provide long-term habitat for the California populations not just individual plants, except in DFAs. | No | Resource not found on the project site | Protocol surveys have been performed for the Easley Project and no saguaro cactus were found onsite. |
| | **LUPA-BIO-SVF-5** | Joshua tree woodland (*Yucca brevifolia* Woodland Alliance): impacts to Joshua tree woodlands (see Glossary of Terms) will be avoided to the maximum extent practicable (see Glossary of Terms), except for minor incursions (see Glossary of Terms). | No | Resource not found on the project site | Protocol surveys have been performed for the Easley Project and no Joshua tree woodlands were found onsite. |
| | **LUPA-BIO-SVF-6** | Microphyll woodland: impacts to microphyll woodland (see Glossary of Terms) will be avoided, except for minor incursions (see Glossary of Terms). | Yes | | The riparian vegetation type on the site is the Sonoran-Coloradan Semi-Desert Wash Woodland (mapped as desert dry wash woodland). Desert dry wash woodland will be avoided with a 200-foot buffer on BLM administered land. The Project will comply with this CMA. |
| | **LUPA-BIO-SVF-7** | Crucifixion thorn stands: (*Castela emoryi* Shrubland Special Stands) Crucifixion thorn stands with greater than 100 individuals will be avoided. | No | Resource not found on the project site | Protocol surveys have been performed for the Easley Project and no crucifixion thorn stands with greater than 100 individuals were found onsite. |
| **General Vegetation Management (VEG)** | **LUPA-BIO-VEG-1** | Management of cactus, yucca, and other succulents will adhere to current up-to-date BLM policy. | Yes | | Data collected during field surveys has mapped all cactus, yucca, and succulent occurrences in the Biological Resources Technical Report. The Applicant will comply with this CMA if cactus, yucca, and other succulents are found on the site. |
| | **LUPA-BIO-VEG-2** | Promote appropriate levels of dead and downed wood on the ground, outside of campground areas, to provide wildlife habitat, seed beds for vegetation establishment, and reduce soil erosion, as determined appropriate on an activity-specific basis. | Yes | | The Applicant will allow appropriate levels of wood on the ground taking into consideration that it is a solar project and vegetation must be cleared to a certain extent. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | | | | The Project will comply with this CMA. |
| | **LUPA-BIO-VEG-3** | Allow for the collection of plant material consistent with the maintenance of natural ecosystem processes. | Yes | | Prior to Project fencing, plant material could be collected as necessary. After fencing, this CMA is not feasible within the solar facility fenceline. The Project will comply with this CMA prior to the fencing of the site. |
| | **LUPA-BIO-VEG-4** | Within the Bishop Field Office area, provide yearlong protection of endangered, threatened, candidate, and sensitive plant and animal habitats. Yearlong protection means that no discretionary actions which would adversely affect target resources will be allowed. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not within the Bishop Field Office area. |
| | **LUPA-BIO-VEG-5** | All activities will follow applicable BLM state and national regulations and policies for salvage and transplant of cactus, yucca, other succulents, and BLM Sensitive plants. | Yes | | No BLM sensitive plants have been identified on the site. Data collected during field surveys has been mapped in the Biological Resources Technical Report and includes all cactus, yucca, and succulent occurrences. The Applicant will comply with this CMA if cacti, yucca, and/or other succulents require salvage and transplantation. |
| | **LUPA-BIO-VEG-6** | BLM may consider disposal of succulents through public sale, as per current up-to-date state and national policy. | Yes | | Resource occurs on the project site. BLM may consider disposal of succulents through public sale, as per current up-to-date state and national policy. |
| **Individual Focus Species (IFS): Desert Tortoise** | **LUPA-BIO-IFS-1** | Activities within desert tortoise linkages, identified in Appendix D, that may have a negative impact on the linkage will require an evaluation, in the environmental document(s), of the effects on the maintenance of long- term viable desert tortoise populations within the affected linkage. The analysis will consider the amount of suitable habitat, including climate refugia, required to ensure long-term viability within each linkage given the linkage's population density, long-term demographic and genetic needs, degree of existing habitat disturbance/impacts, mortality sources, and most up-to-date population viability modeling. Activities that would compromise the long-term viability of a linkage population or the function of the linkage, as determined by the BLM in coordination with USFWS and CDFW, are prohibited and will require reconfiguration or re-siting. | Yes | | The Easley solar facility footprint is located within the Pinto Wash Desert Tortoise Linkages identified in DRECP Appendix D, but does not overlap the Area of Cristial Environmental Concern within the linkage. Impacts to the Pinto Wash Desert Tortoise Linkage will be assessed within the Biological Resources |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | | | | Technical Report and in the Environmental Documents in compliance with the National Environmental Policy Act. Should the BLM, in coordination with USFWS and CDFW, determine the project compromises the long-term viability of a linkage population or the function of the linkage the project will require reconfiguration or re-siting to be located outside of the linkage.<br><br>~~A portion of the northwestern-most area of the Project site includes a multi-species linkage that is not a TCA or within desert tortoise critical habitat and is already impacted by Desert Sunlight, Desert Harvest, and surrounding agricultural operations. The Applicant will coordinate with BLM to design the Project to maintain connectivity.~~<br><br>The Easley Project 500 kV gen-tie line would cross the Oberon site to connect into the Oberon Substation. Within the Oberon Project site, the 500 kV gen-tie line would cross a 1.5-mile-wide wildlife linkage that connects the Chuckwalla Mountains and the Chuckwalla Valley. Upon completion of construction, the gen-tie line would not impede desert tortoise movement within the linkage.<br><br>The Project will comply with this CMA. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-BIO-IFS-2** | Construction of new roads and/or routes will be avoided to the maximum extent practicable (see Glossary of Terms) within desert tortoise habitat in tortoise conservation areas (TCAs) or tortoise linkages identified in Appendix D, unless the new road and/or route is beneficial to minimize net impacts to natural or ecological resources of concern for desert tortoise. TCAs and identified linkages should have the goal of "no net gain" of road density.<br>Any new road considered within a TCA or identified linkage will not be paved and will be designed and sited to minimize the effect to the function of identified linkages or local desert tortoise populations and shall have a maximum speed limit of 25 miles per hour.<br>Roads requiring the installation of long-term desert tortoise exclusion fencing for construction or operation will incorporate wildlife underpasses (e.g., culverts) to reduce population fragmentation. | Yes | | The Easley Project 500 kV gen-tie line would cross the Oberon site to connect into the Oberon Substation. Within the Oberon Project site, the Easley gen-tie line would be located within a portion of an identified linkage area and TCA that overlaps with critical habitat. The Easley Project will utilize existing access roads (e.g., BLM Open Route DC379) where feasible for construc-tion of the gen-tie line. The Project will comply with this CMA |
| | **LUPA-BIO-IFS-3** | All culverts for access roads or other barriers will be designed to allow unrestricted access by desert tortoises and will be large enough that desert tortoises are unlikely to use them as shelter sites (e.g., 36 inches in diameter or larger). Desert tortoise exclusion fencing may be utilized to direct tortoise use of culverts and other passages. | Yes | | If culverts are needed in areas where desert tortoise would access, the Applicant will fol-low this CMA. Desert tortoise fence and shade structures will be utilized during construction. The Project will comply with this CMA. |
| | **LUPA-BIO-IFS-4** | In areas where protocol and clearance surveys are required (see Appendix D), prior to construction or commencement of any long-term activity that is likely to adversely affect desert tortoises, desert tortoise exclusion fencing shall be installed around the perimeter of the activity footprint (see Glossary of Terms) in accordance with the Desert Tortoise Field Manual (USFWS 2009) or most up-to- date USFWS protocol. Additionally, short-term desert tortoise exclusion fencing will be installed around short-term construction and/or activity areas (e.g., staging areas, storage yards, excavations, and linear facilities), as appropriate, per the Desert Tortoise Field Manual (USFWS 2009) or most up-to-date USFWS protocol.<br>■ Exemption from desert tortoise protocol survey requirements can be obtained from BLM, in coordination with USFWS, and CDFW as applicable, on a case-by-case basis if a designated biologist determines the activity site does not contain the elements of desert tortoise habitat, is unviable for occupancy, or if baseline studies inferred absence during the current or previous active season.<br>■ Construction of desert tortoise exclusion fences will occur during the time of year when tortoise are less active in order to minimize impacts and to accommodate subsequent desert tortoise surveys. Any exemption or modification of desert tortoise exclusion fencing requirements will be based on the specifics of the activity and the site-specific population and habitat parameters. Sites with low population density and disturbed, fragmented, or poor habitat are likely to be | Yes | | Desert tortoise protocol surveys have been performed, desert tortoise fence installation will occur prior to construction, and clearance surveys will be conducted after fence installation. The Project will comply with this CMA. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | candidates for fencing requirement exemptions or modifications. Substitute measures, such as on-site biological monitors in the place of the fencing requirement, may be required, as appropriate.<br>■ After an area is fenced, and until desert tortoises are removed, the designated biologist is responsible for ensuring that desert tortoises are not being exposed to extreme temperatures or predators as a result of their pacing the fence. Remedies may include the use of shelter sites placed along the fence, immediate translocation, removal to a secure holding area, or other means determined by the BLM, USFWS, and CDFW, as applicable.<br>■ Modification or elimination of the above requirement may also be approved if the activity design will allow retention of desert tortoise habitat within the footprint. If such a modification is approved, modified protective measures may be required to minimize impacts to desert tortoises that may reside within the activity area.<br>■ Immediately prior to desert tortoise exclusion fence construction, a designated biologist (see Glossary of Terms) will conduct a clearance survey of the fence alignment to clear desert tortoises from the proposed fence line's path.<br>■ All desert tortoise exclusion fencing will incorporate desert tortoise proof gates or other approved barriers to prevent access of desert tortoises to work sites through access road entry points.<br>■ Following installation, long-term desert tortoise exclusion fencing will be inspected for damage quarterly and within 48 hours of a surface flow of water due to a rain event that may damage the fencing.<br>■ All damage to long-term or short-term desert tortoise exclusion fencing will be immediately blocked to prevent desert tortoise access and repaired within 72 hours. | | | |
| | **LUPA-BIO-IFS-5** | Following the clearance surveys (see Glossary of Terms) within sites that are fenced with long-term desert tortoise exclusion fencing a designated biologist (see Glossary of Terms) will monitor initial clearing and grading activities to ensure that desert tortoises missed during the initial clearance survey are moved from harm's way.<br>A designated biologist will inspect construction pipes, culverts, or similar structures: (a) with a diameter greater than 3 inches, (b) stored for one or more nights, (c) less than 8 inches aboveground and (d) within desert tortoise habitat (such as, outside the long-term fenced area), before the materials are moved, buried, or capped.<br>As an alternative, such materials shall be capped before storing outside the fenced area or placing on pipe racks. Pipes stored within the long-term fenced area after completing desert tortoise clearance surveys will not require inspection. | Yes | | With implementation of mitigation measures for biological monitoring to be developed during the NEPA process and the specifics in the Project-specific Desert Tortoise Protection and Translocation Plan (POD Appendix I), the Project will comply with this CMA. |
| | **LUPA-BIO-IFS-6** | When working in areas where protocol or clearance surveys are required (see Appendix D), biological monitoring will occur with any geotechnical boring or geotechnical boring vehicle movement to ensure no desert tortoises are killed or burrows are crushed. | Yes | | Biological monitoring will occur with any geotechnical boring or geotechnical boring vehicle movement. The Project will comply with this CMA. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-BIO-IFS-7** | A designated biologist (see Glossary of Terms) will accompany any geotechnical testing equipment to ensure no tortoises are killed and no burrows are crushed. | Yes | | A designated biologist will accompany any geotechnical testing equipment. The Project will comply with this CMA. |
| | **LUPA-BIO-IFS-8** | Inspect the ground under the vehicle for the presence of desert tortoise any time a vehicle or construction equipment is parked in desert tortoise habitat outside of areas fenced with desert tortoise exclusion fencing. If a desert tortoise is seen, it may move on its own. If it does not move within 15 minutes, a designated biologist may remove and relocate the animal to a safe location. | Yes | | With implementation of mitigation measures to be developed during the NEPA process and the specifics in the Project-specific Desert Tortoise Protection and Translocation Plan, the Project will comply with this CMA. |
| | **LUPA-BIO-IFS-9** | Vehicular traffic will not exceed 15 miles per hour within the areas not cleared by protocol level surveys where desert tortoise may be impacted. | Yes | | With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA. |
| **Flat-Tailed Horned Lizard** | **LUPA-BIO-IFS-10** | Comply with the conservation goals and objectives, criteria, and management planning actions identified in the most recent revision of the Flat-tailed Horned Lizard Rangewide Management Strategy (RMS). Activities will include appropriate design features using the most current information from the RMS and RMS Interagency Coordinating Committee to minimize adverse impacts during siting, design, pre-construction, construction, operation, and decommissioning; ensure that current or potential linkages and habitat quality are maintained; reduce mortality; minimize other adverse impacts during operation; and ensure that activities have a neutral or positive effect on the species. | No | Project not within the range or habitat of this species. | The Easley Project is not within flat-tailed horned lizard range. |
| **Bendire's Thrasher** | **LUPA-BIO-IFS-11** | If Bendire's thrasher is present, conduct appropriate activity-specific biological monitoring (see Glossary of Terms) to ensure that Bendire's thrasher individuals are not directly affected by operations (i.e., mortality or injury, direct impacts on nest, eggs, or fledglings). | Yes | | Conservation measures to avoid impacts to birds will be implemented during construction and operations. If Bendire's thrasher are observed during clearance surveys and construction, the Project will comply with this mitigation CMA. |
| **Burrowing Owl** | **LUPA-BIO-IFS-12** | If burrowing owls are present, a designated biologist (see Glossary of Terms) will conduct appropriate activity-specific biological monitoring (see Glossary of Terms) to ensure avoidance of occupied burrows and establishment of the 656 feet (200 meter) setback to sufficiently minimize disturbance during the nesting period on all activity sites, when practical. | Yes | | Burrowing owls were found during the Easley surveys. With implementation of mitigation measures to be developed during the NEPA process and the Easley Wildlife Protection and Relocation Plan |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | | | | (POD Appendix K), the Project will comply with this CMA. |
| | **LUPA-BIO-IFS-13** | If burrows cannot be avoided on-site, passive burrow exclusion by a designated biologist (see Glossary of Terms) through the use of one-way doors will occur according to the specifications in Appendix D or the most up-to-date agency BLM or CDFW specifications. Before exclusion, there must be verification that burrows are empty as specified in Appendix D or the most up-to-date BLM or CDFW protocols. Confirmation that the burrow is not currently supporting nesting or fledgling activities is required prior to any burrow exclusions or excavations. | Yes | | Burrowing owls were found during the Easley surveys. With implementation of mitigation to be developed during the NEPA process and the Easley Wildlife Protection and Relocation Plan (POD Appendix K), the Project will comply with this mitigation CMA. |
| | **LUPA-BIO-IFS-14** | Activity-specific active translocation of burrowing owls may be considered, in coordination with CDFW. | Yes | | The Easley Project does not propose active translocation of burrowing owls. If burrowing owls are present on the sites, passive relocation may occur in conformance with CDFW Guidelines. |
| **California Condor** | **LUPA-BIO-IFS-15** | All activities will be designed and sited in a manner to avoid or minimize the likelihood of contact, injury, and mortality of California condors. If a condor is identified at a site, the BLM biological staff and USFWS will be immediately notified for guidance. | No | Project not within the range or habitat of this species. | The Project is not within California condor range or habitat. |
| | **LUPA-BIO-IFS-16** | Flight activity (e.g., surveys, construction, as well as operation and maintenance activities) related to any activities will not be allowed in the airspace extending to 3,000 feet above condor nest sites. | No | Project not within the range or habitat of this species. | The Project is not within California condor range or habitat. |
| | **LUPA-BIO-IFS-17** | In the range of the California condor, structures supported by guy wires will be marked with recommended bird deterrent devices at the appropriate spacing intervals. | No | Project not within the range or habitat of this species. | The Project is not within California condor range or habitat. |
| | **LUPA-BIO-IFS-18** | In the range of the California condor, all equipment and work-related materials that are potentially hazardous to condors, including but not limited to items that can be ingested, picked up, or carried away (e.g., loose-wires, open containers with fluids, some construction materials, etc.) will be kept in closed containers either in the work area or placed inside vehicles when they are not being used and at the end of every work day. | No | Project not within the range or habitat of this species. | The Project is not within California condor range or habitat. |
| | **LUPA-BIO-IFS-19** | In the range of the California condor, when feasible, ethylene glycol-based anti-freeze or other ethylene glycol-based liquid substances will be avoided, and propylene glycol-based antifreeze will be used. Vehicles and equipment using ethylene glycol based substances will be inspected before and after field use as well as during | No | Project not within the range or habitat of this species. | The Project is not within California condor range or habitat. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | storage on sites for leaks and puddles. Standing fluid will be remediated without unnecessary delay. | | | |
| | **LUPA-BIO-IFS-20** | Activities that are determined to have a potential risk of taking condors will implement the best detect, deter, and curtailment strategy available at the time of the activity to minimize adverse effects, and avoid or minimize the likelihood of condor injury and mortality. (An example of a 2015 curtailment strategy is shutting down wind generation operations when condor(s) are present, or wind generation facilities switching to night operations only). The strategy must be approved by the BLM and USFWS, in coordination with CDFW as appropriate. | No | Project not within the range or habitat of this species. | The Project is not within California condor range or habitat. |
| | **LUPA-BIO-IFS-21** | If condors begin to regularly visit a site, BLM may require, in coordination with USFWS, and CDFW as appropriate, the implementation of additional measures to minimize potential impacts to condors. These measures will be based on best available data, activity and areas specifics, and may include, but are not limited to:<br>■ Barriers, including welded wire fabric or hardware cloth, will be installed to prevent access around any facility element that poses a danger to condors.<br>■ Stainless steel lines, rather than poly chemical lines will be used to preclude condors from obtaining and ingesting pieces of poly chemical lines.<br>■ Landing deterrents attached to the walking perching substrates, such as porcupine wire or Daddi Long Legs ®. | No | Project not within the range or habitat of this species. | The Project is not within California condor range or habitat. |
| | **LUPA-BIO-IFS-22** | Operations and/or activities that reach an activity-specified trigger for condor injury and/or mortality as determined by BLM and USFWS, and CDFW as appropriate, will curtail operations and/or activities using best available techniques, as determined by BLM and USFWS, and CDFW as appropriate. (An example of a 2015 curtailment strategy is shutting down wind generation operations when condor(s) are present, or wind generation facilities switching to night operations only.) If curtailment techniques are not viable or available, then operations and/or activities will be suspended until the injury and/or condor mortality issue is resolved to the satisfaction of BLM and USFWS, and CDFW, as appropriate. | No | Project not within the range or habitat of this species. | The Project is not within California condor range or habitat. |
| | **LUPA-BIO-IFS-23** | In the range of the California condor, if an activity may have an impact on California condors, a Condor Operations Strategy (COS) will be developed and implemented on a activity-specific basis in order to avoid and/or reduce the likelihood of injury and mortality from activities. The COS shall be approved by BLM in coordination with USFWS, and CDFW as appropriate for third party activities, and may include, but is not limited, to detailing specifics on: the activity-specific detect, deter and curtailment strategy; monitoring approach to detect condor use of the site; adaptive management approach if condors are found to visit the site; and, activity-specific measures that assist in the recovery of condor. | No | Project not within the range or habitat of this species. | The Project is not within California condor range or habitat. |
| **Golden Eagle** | **LUPA-BIO-IFS-24** | Provide protection from loss and harassment of active golden eagle nests through the following actions:<br>■ Activities that may impact nesting golden eagles, will not be sited or constructed within 1-mile of any active or alternative golden eagle nest within an active golden eagle territory, as determined by BLM in coordination with USFWS as appropriate. | No | Project not within the range or habitat of this species. | The Easley Project is more than 1 mile from suitable golden eagle nesting habitat. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-BIO-IFS-25** | Cumulative loss of golden eagle foraging habitat within a 1 to 4 mile radius around active or alternative golden eagle nests (as identified or defined in the most recent USFWS guidance and/or policy) will be limited to less than 20%. See **CONS-BIO-IFS-5** for the requirement in Conservation Lands. | Yes | | The nearest golden eagle nests are located in the Chuckwalla Mtns (south of I-10) and in or near Joshua Tree National Park (northwest and northeast of the site). All these nests have substantial areas of protected foraging habitat surrounding them. The Project would not cause loss of foraging habitat within approximately 2 miles of any nest. It would contribute to some loss of foraging habitat between 2 and 4 miles of nest sites but given the potential area available for foraging, cumulative losses would be less than 20% to the available foraging habitat. The Project will comply with this CMA. |
| | **LUPA-BIO-IFS-26** | For activities that impact golden eagles, applicants will conduct a risk assessment per the applicable USFWS guidance (e.g. the Eagle Conservation Plan Guidance) using best available information as well as the data collected in the pre-project golden eagle surveys. | No | Project not within the range or habitat of this species. | Impacts to golden eagle are not reasonably foreseeable due to distance to nesting sites and the nature of the Project infrastructure. Therefore, this CMA does not apply. |
| | **LUPA-BIO-IFS-27** | If a permit for golden eagle take is determined to be necessary, an application will be submitted to the USFWS in order to pursue a take permit. | No | Project not within the range or habitat of this species. | Based on the availability of golden eagle nesting habitat and existing and historic golden eagle locations near the Project area, and the nature of the Project infrastructure, the Easley Project would not require a golden eagle take permit. |
| | **LUPA-BIO-IFS-28** | In order to evaluate the potential risk to golden eagles, the following activities are required to conduct 2 years of pre-project golden eagle surveys in accordance with USFWS Eagle Conservation Plan Guidance as follows:<br>■ Wind projects and solar projects involving a power tower<br>■ Other activities for which the BLM, in coordination with USFWS, and CDFW as appropriate, determines take of golden eagle is reasonably foreseeable or there is a potential for take of golden eagle | No | Project not within the range or habitat of this species. | Impacts to golden eagle are not reasonably foreseeable due to distance to nesting sites and the nature of the Project infrastructure. Therefore, this CMA does not apply. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-BIO-IFS-29** | For active nests with recreational conflicts that risk the occurrence of take, provide public notification (e.g., signs) of the sensitive area and implement seasonal closures as appropriate. | No | Project not within the range or habitat of this species. | The Easley Project is not in an area of open recreation and is not a known nesting area. No recreational conflicts exist, and no public notification would be required. |
| | **LUPA-BIO-IFS-30** | For activities where ongoing take of golden eagles is anticipated, develop advanced conservation practices per USFWS Eagle Conservation Plan Guidance. | No | Project not within the range or habitat of this species. | Ongoing take of golden eagles is not anticipated at the Project. |
| | **LUPA-BIO-IFS-31** | As determined necessary by BLM in coordination with USFWS, and CDFW as appropriate, for activities/projects that are likely to impact golden eagles implement site-specific golden eagle mortality monitoring in support of the pre-construction, pre-activity risk assessment surveys. | No | Project not within the range or habitat of this species. | The Easley Project is not likely to impact golden eagles. Avian Power Line Interaction Committee (APLIC) guidelines will be followed to avoid bird electrocutions along the gen-tie line. |
| **Swainson's Hawk** | **LUPA-BIO-IFS-32** | Avoid use of rodenticides and insecticides within five miles of active Swainson's hawk nest. | No | Project not within the range or habitat of this species. | The Project is outside of the geographic range (except during migration) of Swainson's hawks. |
| **Desert Bighorn Sheep** | **LUPA-BIO-IFS-33** | Access to, and use of, designated water sources for desert bighorn sheep will not be impeded by activities in designated and new utility corridors. | No | Resource not found on the project site | No designated water sources for desert bighorn sheep are located within the Easley Project. |
| | **LUPA-BIO-IFS-34** | Transmission projects and new utility corridors will minimize effects on access to, and use of, designated water sources for desert bighorn sheep. | No | Resource not found on the project site | No designated water sources are located within the Easley Project |
| **Mohave Ground Squirrel** | **LUPA-BIO-IFS-35** | Protocol surveys (see Glossary of Terms) are required for activities in Mohave ground squirrel key population centers and linkages as indicated in Appendix D. Results of protocol surveys will be provided to BLM and CDFW to consult on, as appropriate, for third party activities. | No | Project not within the range or habitat of this species. | The Easley Project is outside of the range of the Mohave ground squirrel. |
| | **LUPA-BIO-IFS-36** | Activities in Mohave ground squirrel key population centers, as identified in Appendix D, requiring an Environmental Impact Statement are required to assess the effect of the activity on the long-term function of the affected key population center.<br>■ Activities within a key population center, as identified in Appendix D, must be designed to avoid adversely impacting the long-term function of the affected key population center. | No | Project not within the range or habitat of this species. | The Easley Project is outside of the range of the Mohave ground squirrel. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-BIO-IFS-37** | Activities in key population centers will be sited in previously disturbed areas, areas of low habitat quality and in areas with low habitat intactness, to the maximum extent practicable (see Glossary of Terms). | No | Project not within the range or habitat of this species. | The Easley Project is outside of the range of the Mohave ground squirrel. |
| | **LUPA-BIO-IFS-38** | Disturbance of suitable habitat from activities, requiring an EA or EIS, within the Mohave ground squirrel key population centers and linkages (as identified in Appendix D) will not occur during the typical dormant season (August 1 through February 28) unless absence is inferred and supported by protocol surveys or other available data during the previous active season. | No | Project not within the range or habitat of this species. | The Easley Project is outside of the range of the Mohave ground squirrel. |
| | **LUPA-BIO-IFS-39** | During the typical active Mohave ground squirrel season (February 1 through August 31), conduct clearance surveys throughout the site, immediately prior to initial ground disturbance in the areas depicted in Appendix D. In the cleared areas, perform monitoring to determine if squirrels have entered cleared areas. Contain ground disturbance to within areas cleared of squirrels.<br>■ Detected occurrences of Mohave ground squirrel will be flagged and avoided, with a minimum avoidance area of 50 feet, until the squirrels have moved out of harm's way. A designated biologist (see Glossary of Terms) may also actively move squirrels out of harm's way. | No | Project not within the range or habitat of this species. | The Easley Project is outside of the range of the Mohave ground squirrel. |
| | **LUPA-BIO-IFS-40** | Activities sited in a Mohave ground squirrel linkage (see Appendix D) that may impact the linkage are required to analyze the potential effects on connectivity through the linkage. The activity must be designed to maintain the function of the linkage after construction/implementation and during project/activity operations. Linkage function will be assessed by considering pre- and post-activity ability of the area to support resident Mohave ground squirrels and provide for dispersal of their offspring to key population centers outside the linkage, and dispersal through the linkage between key population centers.<br>Activities that occur in Mohave ground squirrel linkages shown in Appendix D must be configured and located in a manner that does not diminish Mohave ground squirrel populations in the linkage. | No | Project not within the range or habitat of this species. | The Easley Project is outside of the range of the Mohave ground squirrel. |
| | **LUPA-BIO-IFS-41** | For any ground-disturbing (e.g., vegetation removal, earthwork, trenching) activities, occurrences of Mohave ground squirrel will be flagged and avoided, with a minimum avoidance area of 50 feet, until the squirrels have moved out of harm's way. A designated biologist (see Glossary of Terms) may also actively move squirrels out of harm's way. | No | Project not within the range or habitat of this species. | The Easley Project is outside of the range of the Mohave ground squirrel. |
| | **LUPA-BIO-IFS-42** | Rodenticides will not be used to manage rodents on activity within the range of the Mohave ground squirrel. Use of rodenticide inside of buildings is allowed. | No | Project not within the range or habitat of this species. | The Easley Project is outside of the range of the Mohave ground squirrel. |
| **Compensation** | **LUPA-BIO-COMP-1** | Impacts to biological resources, identified and analyzed in the activity specific environmental document, from activities in the LUPA Decision Area will be compensated using the standard biological resources compensation ratio, except for | Yes | | The Applicant will develop a proposed mitigation package to mitigate impacted biological |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | the biological resources and specific geographic locations listed as compensation ratio exceptions, specifics in CMAs **LUPA-BIO-COMP-2** through **-4**, and previously listed CMAs. Compensation acreage requirements may be fulfilled through non-acquisition (i.e., restoration and enhancement), land acquisition (i.e., preserve), or a combination of these options, depending on the activity specifics and BLM approval/authorization.<br>Compensation for the impacts to designated desert tortoise critical habitat will be in the same critical habitat unit as the impact (see **Table 18**). Compensation for impacts to desert tortoise will be in the same recovery unit as the impact.<br>Refer to CMA **LUPA-COMP-1** and **2** for the timing requirements for initiation or completion of compensation. | | | resources that will be reviewed through the NEPA process. This includes any impacts to desert tortoise habitat, designated critical desert tortoise habitat (500 kV gen-tie line), desert tortoise linkage, and desert riparian woodland vegetation (minor incursion). Impacts to the Pinto Wash Desert Tortoise Linkage outside of ACEC designations are mitigated at the standard mitigation ratio. The Project will comply with this CMA. |
| | **LUPA-BIO-COMP-2** | Birds and Bats – The compensation for the mortality impacts to bird and bat Focus and BLM Special Status Species from activities will be determined based on monitoring of bird and bat mortality and a fee re-assessed every 5 years to fund compensatory mitigation. The initial compensation fee for bird and bat mortality impacts will be based on pre-project monitoring of bird use and estimated bird and bat species mortality from the activity. The approach to calculating the operational bird and bat compensation is based on the total replacement cost for a given resource, a Resource Equivalency Analysis. This involves measuring the relative loss to a population (debt) resulting from an activity and the productivity gain (credit) to a population from the implementation of compensatory mitigation actions. The measurement of these debts and gains (using the same "bird years" metric as described in Appendix D) is used to estimate the necessary compensation fee.<br>Each activity, as determined appropriate by BLM in coordination with USFWS, and CDFW as applicable, will include a monitoring strategy to provide activity-specific information on mortality effects on birds and bats in order to determine the amount and type of compensation required to offset the effects of the activity, as described above and in detail in Appendix D. Compensation will be satisfied by restoring, protecting, or otherwise improving habitat such that the carrying capacity or productivity is increased to offset the impacts resulting from the activity. Compensation may also be satisfied by non-restoration actions that reduce mortality risks to birds and bats (e.g., increased predator control and protection of roosting sites from human disturbance). Compensation will be consistent with the most up to date DOI mitigation policy. | Yes | | The Project will create and implement an agency-approved Bird and Bat Conservation Strategy that will consider the actions addressed here (see POD Appendix M). Implementation of the Project-specific Bird and Bat Conservation Strategy will comply with this CMA. |
| | **LUPA-BIO-COMP-3** | Golden eagle – BLM and third-party initiated activities, will provide specific golden eagle compensation in accordance with the most up to date BLM or USFWS policies, including applicable USFWS Eagle Conservation Plan Guidance. | No | Resource not found on the project site | The Project will have no direct impacts to golden eagles and loss of foraging habitat is addressed in other CMAs, so no compensation is required. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-BIO-COMP-4** | Golden eagle – Third-party applicant/activity proponents are required to contribute to a DRECP-wide golden eagle monitoring program, if the activity/project(s) has been determined, through the environmental analysis, to likely impact golden eagles. | No | Resource not found on the project site | The Project will have no direct impacts to golden eagles and loss of foraging habitat is addressed in other CMAs, so no compensation is required. |
| **Air Resources** | **LUPA-AIR-1** | All activities must meet the following requirements:<br>■ Applicable National Ambient Air Quality Standards (Section 109)<br>■ State Implementation Plans (Section 110)<br>■ Control of Pollution from Federal Facilities (Section 118) including non-point source<br>■ Prevention of Significant Deterioration, including visibility impacts to mandatory Federal Class I Areas (Section 160 et seq.)<br>■ Conformity Analyses and Determinations (Section 176[c])<br>■ Apply best management practices on a case by case basis<br>■ Applicable local Air Quality Management Jurisdictions (e.g., 403 SCAQMD) | Yes | | The Project will comply with this CMA and meet all federal, state, and local laws and regulations. |
| | **LUPA-AIR-2** | Because project authorizations are a federal undertaking, air quality standards for fugitive dust may not exceed local standards and requirements. | Yes | | With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA. |
| | **LUPA-AIR-3** | Where impacts to air quality may be significant under NEPA, requiring analysis through an Environmental Impact Statement, require documentation for activities to include a detailed discussion and analysis of Ambient Air Quality conditions (baseline or existing), National Ambient Air Quality Standards, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts and greenhouse gas emissions). This content is necessary to disclose the potential impacts from temporary or cumulative degradation of air quality. The discussion will include a description and estimate of air emissions from potential construction and maintenance activities, and proposed mitigation measures to minimize net $PM_{10}$ and $PM_{2.5}$ emissions. The documentation will specify the emission sources by pollutant from mobile sources, stationary sources, and ground disturbance. A Construction Emissions Mitigation Plan will be developed. | Yes | | With implementation of mitigation measures to be developed during the NEPA process and laid out in the Dust Control Plan (POD Appendix U), and as modeled in the Air Quality Emissions Report (POD Appendix S), the Project will comply with this CMA. |
| | **LUPA-AIR-4** | Because fugitive dust is the number one source of $PM_{10}$ and $PM_{2.5}$ emissions in the Mojave and Sonoran Deserts, fugitive dust impacts to air quality must be analyzed for all activities/projects requiring an Environmental Impact Statement and Environmental Assessment.<br>■ The NEPA air quality analysis may include modelling of the sources of PM10 and PM2.5 that occur prior to construction and/or ground disturbance from the activity/project, and show the timing, duration and transport of emissions off site. When utilized, the modeling will also identify how the generation and movement of PM10 and PM2.5 will change during and after construction and/or ground disturbance of the activity/project under all activity/project specific NEPA | Yes | | With implementation of mitigation measures to be developed during the NEPA process and laid out in the Dust Control Plan (POD Appendix U), and as modeled in the Air Quality Emissions Report (POD Appendix S), the Project will comply with this CMA. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | alternatives. The BLM air resource specialist and Authorizing Officer will determine if modelling is required as part of the NEPA analysis based on estimated types and amounts of emissions. | | | |
| | **LUPA-AIR-5** | A fugitive Dust Control Plan will be developed for all projects where the NEPA analysis shows an impact on air quality from fugitive dust.<br>***II.4.2.1.3 Comprehensive Trails and Travel Management***<br>**Components of a Designated Travel Network**<br>In 2006, the BLM issued Instruction Memorandum No. 2006-173, which established policy for the use of terms and definitions associated with the management of transportation-related linear features. It also set a data standard and a method for storing electronic transportation asset data. According to the memorandum, all transportation assets are defined as follows:<br>■ Road: A linear route declared a road by the owner, managed for use by low-clearance vehicles having four or more wheels, and maintained for regular and continuous use. These may include ROW roads granted by the BLM to other entities.<br>■ Primitive Road: A linear route managed for use by four-wheel drive or high-clearance vehicles. These routes do not normally meet any BLM road design standards.<br>■ Trail: A linear route managed for human-powered, stock, or OHV forms of transportation or for historical or heritage values. Trails are not generally managed for use by four-wheel drive or high-clearance vehicles.<br>**Designated Roads, Primitive Roads, and Trails** are categorized as follows:<br>■ Tier 1: Roads and Primitive Roads with high values for commercial, recreational, casual uses, and/or to provide access to other recreation activities.<br>■ Tier 2: Roads and Primitive Roads with high values for recreation and other motorized access (i.e., important through routes).<br>■ Tier 3: Primitive Roads and Trails with high value for motorized and non-motorized recreational pursuits (i.e., spur routes).<br>**Off-Highway Vehicle Management**<br>OHVs are synonymous with off-road vehicles. As defined in 43 CFR 8340.0-5 (a): Off-road vehicle means any motorized/battery-powered vehicle capable of, or designed for, travel on or immediately over land, water, or other natural terrain.<br>In accordance with 43 CFR 8342.1, the BLM's regulations for OHV management, "the authorized officer shall designate all public lands as open, limited, or closed to [OHVs]." As such, all public lands within the Planning Area have been designated in one of three OHV designation categories, as follows:<br>■ Open Area Designations are used for intensive OHV or other transportation use areas where there are no special restrictions or where there are no compelling | Yes | | With implementation of mitigation measures to be developed during the NEPA process and the Dust Control Plan (POD Appendix U), the Project will comply with this CMA. |

| Category | CMA # | CMA Text | Applica-bility | Explanation: Why CMA is not applicable | Comments |
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| | | resource protection needs, user conflicts, or public safety issues to warrant limiting cross-country travel.<br>■ Limited Area Designations are used where travel must be restricted to meet specific resource/resource use objectives. For areas classified as limited, the BLM must consider a range of possibilities, including travel that will be limited to the following:<br>○ Types or modes of travel, such as foot, equestrian, bicycle, and motorized<br>○ Existing roads and trails<br>○ Time or season of use; limited to certain types of vehicles (OHVs, motorcycles, all-terrain vehicles, high clearance, etc.); limited to licensed or permitted vehicles or use<br>○ BLM administrative use only<br>○ Other types of limitations<br>■ Closed Area Designations prohibit vehicular travel, both motorized and mech-anized, transportation cross-country and on routes, except for where valid rights continue to allow access, such as within a designated Wilderness Area. Areas are designated closed if closure to all vehicular use is necessary to protect resources, promote visitor safety, or reduce use conflicts.<br>**Back Country Byways Program**<br>The BLM developed the Back County Byway Program to complement the National Scenic Byway Program established by the U.S. Secretary of Transportation. Back County Byways highlight the spectacular nature of the western landscapes. These routes vary from narrow graded roads that are passable only during a few months of the year to two-lane paved highways with year-round access.<br>BLM will comply with the policy and guidelines of the BLM Back Country Byway Program and intent to showcase routes with high scenic and outstanding natural, cultural, historic or other values consistent with the designation. Where appropriate and feasible, BLM will highlight the spectacular nature of the western landscapes through education and interpretation along linear travel routes which provide recreational driving opportunities that allow for the experiences of solitude and isolation by:<br>■ Maintaining or improving access to BLM recreational destinations and activities<br>■ Helping meet the increasing demand for pleasure driving in back country environments.<br>■ Facilitating effective partnerships at the local, state, and national levels<br>■ Contributing to local and regional economies through increased tourism<br>■ Increasing public awareness of the availability of outstanding recreation attractions on public lands<br>■ Enhancing the visitors' recreation experience and communicate the multiple-use management message through an effective wayside interpretive program | | | |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ■ Increasing the visibility of BLM as a major supplier of outdoor recreation opportunities<br>■ Managing the increased use created through the program to minimize impacts to the environment<br>■ Contributing to the National Scenic Byways Program in a way that is uniquely suited to national public lands managed by BLM<br>Back country byways are designated by the type of road and the vehicle needed to safely travel the byway. Some back country byways vary from a single track bike trail to a low speed paved road that traverses back country areas. Segments of Back Country Byways are subdivided into four types based on the characteristic of the road.<br>Due to their remoteness, byway travelers should always inquire locally as to byway access and road conditions.<br>■ Type I – Roads are paved or have an all-weather surface and have grades that are negotiable by 2-wheel drive vehicles and passenger cars. Most of these roads are narrow, slow speed, secondary routes though public lands.<br>■ Type II – Roads that require high-clearance type vehicles such as trucks or 4-wheel drive vehicles. These roads are usually not paved, but may have some type of surfacing. Grades, curves, and road surface are such that they can be negotiated with a 2-wheel drive high clearance vehicle without undue difficulty.<br>■ Type III – Roads require 4-wheel drive vehicles or other specialized vehicles such as dirt bikes, all-terrain vehicles (ATVs), etc. These roads are usually not surfaced, but are managed to provide for safety and resource protection needs. These roads can often have steep grades, uneven tread surfaces, and other characteristics that will require specialized vehicles to negotiate usually at slow speeds.<br>■ Type IV – Trails are managed specifically to accommodate dirt bike, mountain bike, snowmobile or all-terrain vehicle use. Most of these routes are single track trails. | | | |
| **LUPA-Wide Conservation and Management Actions for Comprehensive Trails and Travel Management** | **LUPA-CTTM-1** | Maintain and manage adequate Road, Primitive Road, and Trail Access to and within SRMAs, ERMAs, OHV Open Areas, and Level 1, 2, and 3 Recreation Facilities. | No | Project is not located in or near the area specified in the CMA. | The Project would not impact access to recreational areas. Some routes that do not lead to recreational areas may be closed – an implementation decision for the BLM. |
| | **LUPA-CTTM-2** | Avoid activities that would have a significant adverse impact on use and enjoyment within 0.5 mile from centerline of tier 2 Roads/Primitive Roads, and 300 feet from centerline of tier 3 primitive roads/trails. If avoidance of Tier 2 and 3 roads, primitive roads and trails is not practicable, relocate access to the same or higher standard and maintain the setting characteristics and access to recreation activities, facilities, and destinations. | No | Project is not located in or near the area specified in the CMA. | The Easley Project would not impact access to recreational areas. Some routes that do not lead to recreational areas may be closed – an implementation decision for the BLM. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-CTTM-3** | Manage other significant linear features such as Mojave Road, Bradshaw Trail, or other recognized linear features to protect their important recreation activities, experiences and benefits. Prohibit activities that have a significant adverse impact on use and enjoyment within 0.5 mile (from centerline) of such linear features. | No | Project is not located in or near the area specified in the CMA. | There are no significant linear features that are within 0.5 miles of the Project. The nearest linear feature, the Bradshaw Trail, is about 17 miles south of Desert Center. |
| | **LUPA-CTTM-4** | If residual impacts to Tier 1 and Tier 2 roads/primitive roads, Back Country Byways, or significant linear features occur from adjacent DFAs or other activities, commensurate compensation in the form of enhanced recreation operations, access, recreation facilities or opportunities will be required. | No | Project is not located in or near the area specified in the CMA. | There are no Tier 1 or Tier 2 roads/primitive roads, Back Country Byways, or significant linear features that would be affected by the Project. |
| | **LUPA-CTTM-5** | Manage OHV use per the appropriate Transportation and Travel Management Plan/RMP and/or the SRMA Objectives as outlined in Appendix C as Open, Limited or Closed. | No | Project is not located in or near the area specified in the CMA. | The Easley Project would not conflict with OHV management. Some routes that do not lead to recreational areas may be closed – an implementation decision for the BLM. |
| | **LUPA-CTTM-6** | Manage Back Country Byways as a component of BLM Recreation and Travel and Transportation Management program**.** | No | Project is not located in or near the area specified in the CMA. | There are no Back Country Byways within the Desert Center area. The nearest Back Country Byway, the Bradshaw Trail, is about 17 miles south of Desert Center. |
| | **LUPA-CTTM-7** | Manage Recreation Facilities consistent with the objectives for the recreation management areas and facilities (see also Section II.4.2.1.10). | No | Project is not located in or near the area specified in the CMA. | There are no Recreation Facilities within, or near, the Project. |
| **Cultural Resources and Tribal Interests** | **LUPA-CUL-1** | Continue working with the California Office of Historic Preservation (OHP) to develop and implement a program for record keeping and tracking agency actions that meets the needs of BLM and OHP organizations pursuant to existing State and National agreements and regulation (BLM State Protocol Agreement; BLM National Programmatic Agreement). | No | Land use does not occur on project site. | This is a Plan-wide BLM task. Record keeping and tracking are agency functions, therefore, this CMA does not pertain to this specific Project. |
| | **LUPA-CUL-2** | Using relevant archaeological and environmental data, identify priority geographic areas for new field inventory, based upon a probability for unrecorded significant resources and other considerations. | No | Land use does not occur on project site. | This is a Plan-wide BLM task. BLM determines priority geographic areas for inventory outside of the compliance review process for individual projects. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-CUL-3** | Identify places of traditional cultural and religious importance to federally recognized Tribes and maintain access to these locations for traditional use. | Yes | | The intent of this CMA is accomplished through compliance with NEPA, EX13175, EX13007 and all other applicable laws, regulations, and policies. The Project will comply with this CMA. |
| | **LUPA-CUL-4** | Design activities to minimize impacts on cultural resources including places of traditional cultural and religious importance to federally recognized Tribes. | Yes | | The intent of this CMA is accomplished through compliance with NEPA, National Historic Preservation Act (NHPA), EX13175, EX13007 and all other applicable laws, regulations, and policies. The Project will comply with this CMA. |
| | **LUPA-CUL-5** | Develop interpretive material to correspond with recreational uses to educate the public about protecting cultural resources and avoiding disturbance of archaeological sites. | No | Land use does not occur on project site. | This is a Plan-wide BLM task. The Project does not include any recreational uses. |
| | **LUPA-CUL-6** | Develop partnerships to assist in the training of groups and individuals to participate in site stewardship programs. | No | Land use does not occur on project site. | This is a Plan-wide BLM task. The Project would not result in group or individual use of any sites. |
| | **LUPA-CUL-7** | Coordinate with visual resources staff to ensure VRM Classes consider cultural resources and tribal consultation to include landmarks of cultural significance to Native Americans (TCPs, trails, etc.). | Yes | | The analysis of the VRM Classes will consider all applicable resources in the analysis. The Project will comply with this CMA. |
| | **LUPA-CUL-8** | Conduct regular contact and consultation with federally recognized Tribes and individuals, consistent with statute, regulation and policy. | Yes | | This is an agency requirement so would be fulfilled by BLM through compliance with NEPA, Section 106 of the NHPA, EX13175, and all other applicable laws, regulations, and policies. The Project will comply with this CMA |
| | **LUPA-CUL-9** | Promote DRECP desert vegetation types/communities by avoiding them where possible, then use required compensatory mitigation, off-site mitigation, and other means to ensure Native American vegetation collection areas and practices are maintained. | Yes | | This is accomplished through NEPA, EX13175 and EX13007 and all other applicable laws, regulations, and policies. The Project will comply with this CMA. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-CUL-10** | Promote and protect desert fan palm oasis vegetation type/communities by avoiding where possible, then use required compensatory mitigation, off-site mitigation, and other means to ensure Native American cultural values are maintained. | No | Resource not found on the project site | There are no desert fan palm oasis communities near the Project. |
| | **LUPA-CUL-11** | Promote and protect desert microphyll woodland vegetation type/communities to ensure Native American cultural values are maintained. | Yes | | The intent of this CMA is accomplished through compliance with NEPA, EX13175, EX13007 and all other applicable laws, regula-tions, and policies. The Easley Project will avoid microphyll woodland except for minor incursion. The Project will comply with this CMA. |
| **Lands and Realty** | **LUPA-LANDS-1** | Identify acquired lands as right-of-way exclusion areas when development is incompatible with the purpose of the acquisition. | No | Land use does not occur on project site. | The Project is not located on acquired lands. |
| | **LUPA-LANDS-2** | Prioritize acquisition of land within and adjacent to conservation designation allocations. Acquired land in any land use allocation in this Plan will be managed according to the applicable allocation requirements and/or for the purposes of the acquisition. Management boundaries for the allocation may be adjusted to include the acquired land if the acquisition lies outside the allocation area through a future land use plan amendment process. | No | Project is not associated with a land exchange. | The Project would not acquire lands except as mitigation. Mitigation lands would need to conform to the resource needs and then could consider other priorities. Mitigation lands would need to be approved by the BLM |
| | **LUPA-LANDS-3** | Within land use allocations where renewable energy and ancillary facilities are not allowed, an exception exists for geothermal development. Geothermal development will be an allowable use if a geothermal-only DFA overlays the allocation and the lease includes a no surface occupancy stipulation with exception of three specific parcels in the Ocotillo Wells SRMA (refer to the Ocotillo Wells SRMA Special Unit Management Plan in Appendix C). | No | Land use does not occur on project site. | The Project is located in a DFA |
| | **LUPA-LANDS-4** | Nonfederal lands within the boundaries of BLM LUPA land use allocations are not affected by the LUPA. | Yes | | The Project parcels located on federal land are designated as DFA. |
| | **LUPA-LANDS-5** | The MUCs used to determine land tenure in the CDCA Plan will be replaced by areas listed in the CMAs below. | Yes | | The Project is located in a DFA and will comply with this CMA. |
| | **LUPA-LANDS-6** | Any activities on Catellus Agreement lands will be consistent with deed restrictions | No | Project not located on federal lands with this designation. | The Project is not located on Catellus Agreement lands. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-LANDS-7** | Any activities on Catellus Agreement lands will be subject to the approval of the California State Director. | No | Project not located on federal lands with this designation. | The Project is not located on Catellus Agreement lands. |
| | **LUPA-LANDS-8** | The CDCA Plan requirement that new transmission lines of 161kV or above, pipelines with diameters greater than 12 inches, coaxial cables for interstate communications, and major aqueducts or canals for interbasin transfers of water will be located in designated utility corridors, or considered through the plan amendment process outside of designated utility corridors, remains unchanged. The only exception is that transmission facilities may be located outside of designated corridors within DFAs without a plan amendment. This CMA does not apply the Bishop and Bakersfield RMPs. | Yes | | The Project is located in a DFA and will comply with this CMA. |
| **Exchanges with the State of California** | **LUPA-LANDS-8** | Continue land exchanges with the State of California, as per the LUPA goals and objectives in Section II.4.1.4. Refer to Appendix F. | No | Project is not associated with a land exchange. | No land exchanges would be made for the Project. |
| | **LUPA-LANDS-9** | Enter into land exchanges with the California State Lands Commission (CSLC) which convey BLM lands suitable for, or developed as, large-scale renewable energy related projects in exchange for CSLC school lands located in and adjacent to designated conservation areas. These exchanges will follow the procedures outlined in Memorandum of Agreement Relating to Land Exchanges to Consolidate Land Parcels signed by the BLM and CSLC on May 21, 2012. | No | Project is not associated with a land exchange. | No land exchanges would be made for the Project. |
| | **LUPA-LANDS-10** | Prioritize land exchange proposals from the CSLC on available lands if there are competing land tenure proposals (e.g., land sale or exchange), CSLC proposals that enhance revenues for schools will generally be given priority. | No | Project is not associated with a land exchange. | No land exchanges would be made for the Project. |
| **Livestock Grazing** | **LUPA-LIVE-1** | Adopt the Standards of Rangeland Health and Guidelines for Grazing Management, as detailed below, for the CDCA. This CMA does not apply in the Bishop and Bakersfield RMPs.<br>**Standards of Rangeland Health and Guidelines for Grazing Management**<br>Regional Public Land Health Standards and Guidelines are required for all BLM administered lands in accordance with Part 43 of the CFR subsection 4180. These regulations require that State Directors, in consultation with Resource Advisory Councils, develop Standards for Rangeland Health and Guidelines for grazing management.<br>The BLM in coordination and consultation with the California Desert District Advisory Committee (see Section 601 of the FLPMA as amended) developed standards and guidelines for the CDCA and used the following land use plan amendments to analyze the specific standard and guideline and to provide the public and opportunity to comment.<br>■ Northern and Eastern Colorado Desert Management Plan—NECO—ROD signed Dec. 2002 (BLM 2002a) | No | Land use does not occur on project site. | The Project is not located in a grazing allotment. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ■ Northern and Eastern Mojave Desert Management Plan—NEMO—ROD signed Dec. 2002 (BLM 2002b)<br>■ West Mojave Plan—WEMO—ROD signed March 2006 (BLM 2006)<br>The regulations require approval by the Secretary of the Interior prior to full implementation of standards and guidelines. Until approval is received, the fallback standards and guidelines will be used.<br>The regulations require approval by the Secretary of the Interior prior to full implementation of the California Desert District standards and guidelines. Until approval is received, the fallback standards and guidelines will be used in the 5 Desert District Offices.<br>Bakersfield and Bishop Field Offices are covered under the Central California Standards and Guidelines and require no additional approval to continue to use that document.<br>**Standards and Guidelines for the CDCA**<br>**Standards** of land health are expressions of levels of physical and biological condition or degree of function required for healthy lands and sustainable uses, and define minimum resource conditions that must be achieved and sustained (BLM 2001).<br>**Guideline.** A practice, method or technique determined to be appropriate to ensure that standards can be met or that significant progress can be made toward meeting the standard. Guidelines are tools such as grazing systems, vegetative treatments, or improvement projects that help managers and permittees achieve standards. Guidelines may be adapted or modified when monitoring or other information indicates the guideline is not effective, or a better means of achieving the applicable standard becomes appropriate (H-4180-1 Rangeland Health Standards).<br>The following **Standards** for the CDCA are from the NECO, NEMO, WEMO, and Palm Springs South Coast Resource Management Plan (PSSCRMP) land use plan amendments.<br>**Soils**<br>Soils exhibit infiltration and permeability rates that are appropriate to soil type, climate, geology, land form, and past uses. Adequate infiltration and permeability of soils allow accumulation of soil moisture necessary for optimal plant growth and vigor, and provide a stable watershed, as indicated by:<br>■ Canopy and ground cover are appropriate for the site.<br>■ There is a diversity of plant species with a variety of root depths.<br>■ Litter and soil organic matter are present at suitable sites.<br>■ Microbiotic soil crusts are maintained and in place at appropriate locations.<br>■ Evidence of wind or water erosion does not exceed natural rates for the site.<br>■ Soil permeability, nutrient cycling, and water infiltration are appropriate for the soil type. | | | |

**Native Species**

Healthy, productive, and diverse habitats for native species, including Special Status Species (federal threatened and endangered, federally proposed, federal candidates, BLM sensitive, or California State threatened and endangered, and Unique Plant Assemblages), are maintained in places of natural occurrence, as indicated by:

- Photosynthetic and ecological processes are continuing at levels suitable for the site, season, and precipitation regimes.
- Plant vigor, nutrient cycle, and energy flow are maintaining desirable plants and ensuring reproduction and recruitment.
- Plant communities are producing litter within acceptable limits.
- Age class distribution of plants and animals are sufficient to overcome mortality fluctuations.
- Distribution and cover of plant species and their habitats allow for reproduction and recovery from localized catastrophic events.
- Alien and noxious plants and wildlife do not dominate a site or do not require action to prevent the spread and introduction of noxious/invasive weeds.
- Appropriate natural disturbances are evident.
- Populations and their habitats are sufficiently distributed and healthy to prevent the need for new listing as Special Status Species.

**Riparian/Wetland and Stream Function**

Wetland systems associated with subsurface, running, and standing water function properly and have the ability to recover from major disturbances. Hydrologic conditions are maintained, as indicated by:

- Vegetative cover adequately protects banks and dissipates energy during peak water flows.
- Dominant vegetation is an appropriate mixture of vigorous riparian species.
- Recruitment of preferred species is adequate to sustain the plant community.
- Stable soils store and release water slowly.
- Plant species present indicate soil moisture characteristics are being maintained.
- There is minimal cover of shallow-rooted invader species, and they are not displacing deep-rooted native species.
- Shading of stream courses and water courses is sufficient to support riparian vertebrates and invertebrates.
- Stream is in balance with water and sediment being supplied by the watershed.
- Stream channel size (depth and width) and meander is appropriate for soils, geology, and landscape.
- Adequate organic matter (litter and standing dead plant material) is present to protect the site from excessive erosion and to replenish soil nutrients through decomposition.

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | **Water Quality**<br>Surface and groundwater comply with objectives of the Clean Water Act and other applicable water quality requirements, including meeting the California State standards, as indicated by:<br>■ The following do not exceed the applicable requirements: chemical constituents, water temperature, nutrient loads, fecal coliform, turbidity, suspended sediment, and dissolved oxygen.<br>■ Standards are achieved for riparian, wetlands, and water bodies.<br>■ Aquatic organisms and plants (e.g., macro-invertebrates, fish, algae, and plants) indicate support for beneficial uses.<br>■ Monitoring results or other data show water quality is meting the Standard.<br>The following **Guidelines** for grazing in the CDCA are from the NECO, NEMO, WEMO, and PSSCRMP land use plan amendments.<br>■ Facilities will be located away from riparian-wetland areas whenever they conflict with achieving or maintaining riparian-wetland functions.<br>■ The development of springs and seeps or other projects affecting water and associated resources will be designed to protect the ecological functions and processes of those sites.<br>■ Grazing activities at an existing range improvement that conflict with achieving proper functioning conditions (PFC) and resource objectives for wetland systems (lentic, lotic, springs, adits, and seeps) would be modified so PFC and resource objectives can be met, and incompatible projects would be modified to bring them into compliance. The BLM would consult, cooperate, and coordinate with affected interests and livestock producers prior to authorizing modification of existing projects and initiation of new projects. New range improvement facilities would be located away from wetland systems if they conflict with achieving or maintaining PFC and resource objectives.<br>■ Supplements (e.g., salt licks) will be located one-quarter mile or more away from wetland systems so they do not conflict with maintaining riparian-wetland functions.<br>■ Management practices will maintain or promote perennial stream channel morphology (e.g., gradient, width/depth ratio, channel roughness, and sinuosity) and functions that are appropriate to climate and landform.<br>■ Grazing management practices will meet state and federal water quality Standards. Impoundments (stock ponds) having a sustained discharge yield of less than 200 gallons per day to surface or groundwater, are excepted from meeting state drinking water standards per California State Water Resources Control Board Resolution Number 88-63. | | | |

| Category | CMA # | CMA Text | Applica-bility | Explanation: Why CMA is not applicable | Comments |
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| | | ■ Refer to the most-up-to-date BLM Fire Policy for information related to suppression and use of wildland fire within the planning area.<br>■ In years when weather results in extraordinary conditions, seed germination, seedling establishment, and native plant species growth should be allowed by modifying grazing use.<br>■ Grazing on designated ephemeral rangeland could be allowed only if reliable estimates of production have been made, an identified level of annual growth or residue to remain on site at the end of the grazing season has been established, and adverse effects on perennial species are avoided.<br>■ During prolonged drought, range stocking will be reduced to achieve resource objectives and/or prescribed perennial forage utilization. Livestock utilization of key perennial species on year-long allotments should be checked about March 1 when the Palmer Severity Drought Index/Standardized Precipitation Index indicates dry conditions are expected to continue.<br>■ Through the assessment process or monitoring efforts, the extent of invasive and/or exotic plants and animals should be recorded and evaluated for future control measures. Methods and prescriptions should be implemented, and an evaluation would be completed to ascertain future control measures for undesirable species.<br>■ Restore, maintain or enhance habitats to assist in the recovery of federally listed threatened and endangered species. Restore, maintain or enhance habitats of Special Status Species including federally proposed, federal candidates, BLM sensitive, or California State threatened and endangered to promote their conservation.<br>■ Grazing activities should support biological diversity across the landscape, and native species and microbiotic crusts are to be maintained.<br>■ Experimental research efforts should be encouraged to provide answers to grazing management and related resource concerns through cooperative and collaborative efforts with outside agencies, groups, and entities.<br>■ Livestock utilization limits of key perennial species will be as shown in (see **Table 19**) for the various range types.<br>**Monitoring**<br>Monitoring of grazing allotment resource conditions would be routinely assessed to determine if Public Land Health Standards are being met. In those areas not meeting one or more Standards, monitoring processes would be established where none exist to monitor indicators of health until the Standard or resource objective has been attained. Livestock trail networks, grazed plants, livestock facilities, and animal waste are expected impacts in all grazing allotments and these ongoing impacts would be considered during analysis of the assessment and monitoring process. Activity plans for other uses or resources that overlap an allotment could have prescribed resource objectives that may further constrain grazing activities (e.g., ACEC). In an area where | | | |

| LUPA Wide | | | | | |
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| | | a Standard has not been met, the results from monitoring changes to grazing management required to meet Standards would be reviewed annually. During the final phase of the assessment process, the Range Determination includes the schedule for the next assessment of resource conditions. To attain Standards and resource objectives, the best science would be used to determine appropriate grazing management actions. Cooperative funding and assistance from other agencies, individuals, and groups would be sought to collect prescribed monitoring data for indicators of each Standard. | | | |
| **LUPA-Wide Conservation and Management Actions for Livestock Grazing** | **LUPA-LIVE-2** | In the CDCA only, accept grazing permit/lease donations in accordance with legislation in the Fiscal Year 2012 Appropriations Act (Public Law 112-74). | No | Land use does not occur on project site. | The Project is not located in a grazing allotment. |
| | **LUPA-LIVE-3** | In the Bishop and Bakersfield RMPs, determine whether continued livestock grazing would be compatible with achieving land use plan management goals and objectives in the event that the permit/lease is relinquished. | No | Land use does not occur on project site. | The Project is not located in a grazing allotment. |
| | **LUPA-LIVE-4** | If the BLM determines that the grazing allotment is to be put to a different public purpose than grazing, follow the notification requirements outline in the Grazing Regulations at 43 CFR 4110.4-2(b) and BLM Instruction Memorandum (IM) 2011-181 (BLM 2011), or future policy replacing IM 2011-181. | No | Land use does not occur on project site. | The Project is not located in a grazing allotment. |
| | **LUPA-LIVE-5** | For grazing allotments within the CDCA that BLM has received a voluntary request for relinquishment prior to fiscal year 2012, continue the planning process for making these allotments unavailable for grazing. | No | Land use does not occur on project site. | The Project is not located in a grazing allotment. |
| | **LUPA-LIVE-6** | Complete the process for approving rangeland health standards and guidelines for the CDCA Plan (NEMO, WEMO, NECO and PSSCRMP). | No | Land use does not occur on project site. | The Project is not located in a grazing allotment. |
| | **LUPA-LIVE-7** | Make Pilot Knob, Valley View, Cady Mountain, Cronese Lake, and Harper Lake allotments, allocations unavailable for livestock grazing and change to management for wildlife conservation and ecosystem function. Reallocate the forage previously allocated to grazing use in these allotments to wildlife and ecosystem functions. Pilot Knob was closed in the WEMO plan amendment. The Cronese Lake, Harper Lake, and Cady Mountain allotments were closed as mitigation for the impacts to the Agassiz's desert tortoise resulting from the Fort Irwin expansion. All forage allocated to livestock grazing in these allotments will be reallocated to wildlife use and ecosystem function. | No | Land use does not occur on project site. | The Project is not located in a grazing allotment. |
| | **LUPA-LIVE-8** | The following vacant grazing allotments within the CDCA will have all vegetation previously allocated to grazing use reallocated to wildlife use and ecosystem functions and will be closed and unavailable to future livestock grazing: Buckhorn Canyon, Crescent Peak, Double Mountain, Jean Lake, Johnson Valley, Kessler Springs, Oak Creek, Chemehuevi Valley, and Piute Valley. | No | Land use does not occur on project site. | The Project is not located in a grazing allotment. |

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| | **LUPA-LIVE-9** | Allocate the forage that was allocated to livestock use in the Lava Mountain and Walker Pass Desert allotments (which have already been relinquished under the 2012 Appropriations Act) to wildlife use and ecosystem function and permanently eliminate livestock grazing on the allotments. | No | Land use does not occur on project site. | The Project is not located in a grazing allotment. |
| **Minerals** | **LUPA-MIN-1** | High Potential Mineral Areas (identified in CA GEM data)<br>■ These areas have been identified as mineral lands having existing and/or historic mining activity and a reasonable probability of future mineral resource development. These identified areas will be designated as mineral land polygons on DRECP maps, recognized as probable future development areas for planning purposes and allowable use areas.<br>■ If an activity is proposed in a High Potential Mineral Area, analyze and consider the mineral resource value in the NEPA analysis. | No | Land use does not occur on project site. | The Project is not located in an area identified as a High Potential Mineral Area. |
| | **LUPA-MIN-2** | **Existing Mineral/Energy Operations**<br>Existing authorized mineral/energy operations, including existing authorizations, modifications, extensions and amendments and their required terms and conditions, are designated as an allowable use within all BLM lands in the LUPA Decision Area, and unpatented mining claims subject to valid existing rights. Amendments and expansions authorized after the signing of the DRECP LUPA ROD are subject to applicable CMAs, including ground disturbance caps within Ecological and Cultural Conservation Areas, subject to valid existing rights, subject to governing laws and regulations. | No | Land use does not occur on project site. | The Project is not located in an area with existing minerals or energy operations. |
| | **LUPA-MIN-3** | Existing High Priority Mineral/Energy Operations Exclusion Areas<br>■ Existing high-priority operation footprints and their identified expansion areas are excluded from DFA and conservation CMAs, but must comply with LUPA-wide CMAs subject to the governing laws and regulations.<br>■ High priority operation exclusions are referenced by name with their respective footprint (acreage) below.<br>○ MolyCorp REE (General Legal Description: 35º 26'N; 115º 29'W)—10,490.9 surface acres<br>○ Briggs Au, Etna (General Legal Description: 35º 56'N; 117º 11'W)—3,216.9 surface acres<br>○ Cadiz Evaporites (General Legal Description: 34º 17'N; 115º 23'W)—2,591.5 surface acres<br>○ Searles Dry Lake (Evaporate) Operation (General Legal Description: 35º 43'N; 117º 19'W)—72,000 surface acres<br>○ Bristol Dry Lake (Evaporate) Operation (General Legal Description: 34º 29'N; 115º 43'W)—3,500 surface acres<br>○ Mesquite Gold Mine (General Legal Description: 33º 04'N; 114º 59'W)—4,500 surface acres<br>○ Hector Mine (Hectorite Clay) (General Legal Description: 34º 45'N; 116º 25'W)—1,500 surface acres | No | Land use does not occur on project site. | The Project is not located in an existing high priority mineral area. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ○ Castle Mountain/Viceroy Mine (Gold) (General Legal Description: 35º 17'N; 115º 3'W)—5,000 surface acres | | | |
| | **LUPA-MIN-4** | Access to Existing Operations<br>■ Established designated, approved, or authorized access routes to the aforementioned existing authorized operations and areas will be designated as allowable uses.<br>■ Access routes to Plans of Operations and Notices approved under 43 CFR 3809 will be granted subject to valid existing rights listed in 43 CFR 3809.100. | No | Land use does not occur on project site. | The Project is not in an area where there are identified mineral resources. |
| | **LUPA-MIN-5** | Areas Located Outside Identified Mineral Areas<br>■ Areas which could not be characterized due to insufficient data and mineral potential may fluctuate dependent on market economy, extraction technology, and other geologic information- requiring periodic updating. Authorizations are subject to the governing laws and regulations and LUPA requirements. | No | Land use does not occur on project site. | The Project is not in an area where there are identified mineral resources. Therefore, it is not an area that could not be characterized due to insufficient data or where it may fluctuate. |
| | **LUPA-MIN-6** | New or expanded mineral operations will be evaluated on a case-by-case basis, and authorizations are subject to LUPA requirements, and the governing laws and regulations. | No | Land use does not occur on project site. | The Project is not in an area where there are existing mineral operations or identified mineral resources. |
| **National Recreation Trails** | **LUPA-NRT-1** | The Nadeau Road NRT was designated by the Secretary of the Interior in June 2013. The California Desert District nominates the Sperry Wash Road, El Mirage Interpretive Trail East, and El Mirage Interpretive Trail West for NRT designation. | No | Project is not located in or near the area specified in the CMA. | The Project is not near the NRTs |
| | **LUPA-NRT-2** | The Nadeau NRT Management Corridor will be protected and activities impacting use and enjoyment of the trail will be avoided within 0.5 mile from centerline of the route. | No | Project is not located in or near the area specified in the CMA. | The Project is not near the NRT Management Corridor. |
| **Paleontology** | **LUPA-PALEO-1** | If not previously available, prepare paleontological sensitivity maps consistent with the Potential Fossil Yield Classification for activities prior to NEPA analysis. | Yes | | Paleontological sensitivity maps have been included in POD Appendix F (Paleontological Resources Technical Report). The Project will comply with this CMA. |
| | **LUPA-PALEO-2** | Incorporate all guidance provided by the Paleontological Resources Protection Act. | Yes | | With implementation of paleontological resources mitigation measures to be developed during the NEPA process, the Project will comply with the CMA. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-PALEO-3** | Ensure proper data recovery of significant paleontological resources where adverse impacts cannot be avoided or otherwise mitigated. | Yes | | With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with the CMA. |
| | **LUPA-PALEO-4** | Paleontological surveys and construction monitors are required for ground disturbing activities that require an EIS. | Yes | | A paleontological survey has been performed for the Project and will implement mitigation measures (to be developed during the NEPA process) to require that a qualified paleontological monitor(s) will monitor all construction-related earth-moving activities in sediments determined to have a moderate (PFYC 3 or higher) sensitivity. The Project does not require an EIS but will nonetheless comply with this CMA. |
| **Recreation and Visitor Services** | **LUPA-REC-1** | Maintain, and where possible enhance, the recreation setting characteristics – physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls. | Yes | | The Project is surrounded by recreational opportunities and by built environment, including existing and approved renewable energy projects. The Project would be located in a DFA and the area does not experience high levels of recreation. The Project would not maintain or enhance the setting but would be consistent with the existing setting and with the DFA designation |
| | **LUPA-REC-2** | Cooperate with the network of communities and recreation service providers active within the planning area to protect the principal recreation activities and opportunities, and the associated conditions for quality recreation, by enhancing appropriate visitor services, and by identifying and mitigating impacts from development, inconsistent land uses and unsustainable recreation practices such as minimizing impacts to known rockhounding gathering areas. | No | Land use does not occur on project site. | The Project will not directly impact recreation service providers within the DFA or result in unsustainable recreation practices. |
| | **LUPA-REC-3** | Manage lands not designated as SRMAs or ERMAs to meet recreation and visitor services and resource stewardship needs as described in Resource Management Plans (RMPs). | No | Land use does not occur on project site. | The Project is located on land allocated as a DFA and appropriate for renewable energy development and linear |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | | | | infrastructure, DFAs are not allocated for recreation. |
| | **LUPA-REC-4** | Prohibit activities that have a significant adverse impact and that do not enhance conservation or recreation values within one mile of Level 1 and Level 2 Recreation facility footprint. | No | Land use does not occur on project site. | There are no Level 1 or Level 2 recreation areas within one mile of the Project. The nearest Recreation Facility is Corn Springs Campground, 10 miles south of Interstate 10. |
| | **LUPA-REC-5** | Avoid activities that have a significant adverse impact and that do not enhance conservation or recreation values within one-half mile of Level 3 Recreation facility footprint including route access and staging areas. If avoidance is not practicable, the facility must be relocated to the same or higher recreation standard and maintain recreation objectives and setting characteristics. | No | Land use does not occur on project site. | The nearest Level 3 facility is the kiosk at Corn Springs Road, which is outside the ½-mile buffer established in LUPA-REC-5. |
| | **LUPA-REC-6** | Limit signage to that necessary for recreation facility/area identification, interpretation, education and safety/regulatory enforcement. | Yes | | The Project does not anticipate signs other than for temporary detours on existing access roads, if necessary. Signs would be limited to what is necessary. The Project will comply with this CMA. |
| | **LUPA-REC-7** | Refer to local RMPs, RMP amendments, and activity level planning for specially designated areas for Vehicular Stopping, Parking, and Camping limitations. | No | Land use does not occur on project site. | The Project would not include any vehicular stopping, parking, or camping areas. The Project site is located within a DFA. |
| | **LUPA-REC-8** | Provide on-going maintenance of recreation and conservation facilities, interpretive and regulatory signs, roads, and trails. | No | Land use does not occur on project site. | The Project would not be located within or near recreation and conservation facilities. |
| **Soil and Water General** | **LUPA-SW-1** | Stipulations or conditions of approval for any activity will be imposed that provide appropriate protective measures to protect the quantity and quality of all water resources (including ephemeral, intermittent, and perennial water bodies) and any associated riparian habitat (see biological CMAs for specific riparian habitat CMAs). The water resources to which this CMA applies will be identified through the activity-specific NEPA analysis. | Yes | | With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with the CMA. |
| | **LUPA-SW-2** | Buffer zones, setbacks, and activity limitations specifically for soil and water (ground and surface) resources will be determined on an activity/site-specific basis through the environmental review process and will be consistent with the soil and water resource goals and objectives to protect these resources . Specific requirements, such as buffer zones and setbacks, may be based, in part, on the results of the Water Supply Assessment defined below. In general, placement of long-term facilities within buffers or protected zones for soil and water resources is discouraged but may be permitted if soil and water resource management objectives can be maintained. | Yes | | The Project will comply with this CMA and minimize long-term facilities in buffers or protected zones for soil and water resources. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-SW-3** | Where a seeming conflict between CMAs within or between resources arises, the CMA(s) resulting in the most resource protection apply. | Yes | | No conflicts between CMAs have been identified for the Project. |
| | **LUPA-SW-4** | Nothing in the "Exceptions" below applies to or takes precedence over any of the CMAs for biological resources. | Yes | | The Project would comply with the CMAs for biological resources. |
| **Groundwater Resources** | **LUPA-SW-5** | Exceptions to any of the specific soil and water stipulations contained in this section, as well as those listed below under the subheadings "Soil Resources," "Surface Water," and "Groundwater Resources," may be granted by the authorized officer if the applicant submits a plan, or, for BLM-initiated actions, the BLM provides documentation, that demonstrates:<br>■ The impacts are minimal (e.g., no predicted aquifer drawdown beyond existing annual variability in basins where cumulative groundwater use is not above perennial yield and water tables are not currently trending downward) or can be adequately mitigated. | Yes | | The CMA does not require actions but allows for some flexibility on how to comply with other CMAs. |
| **Soil Resources** | **LUPA-SW-6** | In addition to the applicable required governmental safeguards, third party activities will implement up-to-date standard industry construction practices to prevent toxic substances from leaching into the soil. | Yes | | The Applicant will ensure that its third-party contractor adheres to LUPA-SW-6 and the specifics in Hazardous Materials Management and Oil Spill Response Plan (POD Appendix W). The Project will comply with this CMA. |
| | **LUPA-SW-7** | Prepare an emergency response plan, approved by the BLM contaminant remediation specialist, that ensures rapid response in the event of spills of toxic substances over soils. | Yes | | A Health, Safety, and Noise Plan, which addresses emergency response is included in POD Appendix T. The Project will comply with this CMA. |
| | **LUPA-SW-8** | As determined necessary on an activity specific basis, prepare a site plan specific to major soil types present (≥5% of footprint or laydown surfaces) in Wind Erodibility Groups 1 and 2 and in Hydrology Soil Class D as defined by the USDA Natural Resource Conservation Service to minimize water and air erosion from disturbed soils on activity sites. | Yes | | The Project will take the erosion potential into consideration during engineering to avoid areas of high erodibility or to minimize water and air erosion through the use of BMPs. No site-specific plan is required. |
| | **LUPA-SW-9** | The extent of desert pavement within the proposed boundary of an activity shall be mapped if it is anticipated that the activity may create erosional or ecologic impacts. Mapping will use the best available data and standards, as determined by BLM. Disturbance of desert pavement within the boundary of an activity shall be limited to the extent possible. If disturbance from an activity is likely to exceed 10% of the desert pavement mapped within the activity boundary, the BLM will determine | Yes | | The Easley Project has small patches of mapped the desert pavement within the Project footprint and may disturb desert pavement. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | whether the erosional and ecologic impacts of exceeding the 10% cap by the proposed amount would be insignificant and/or whether the activity should be redesigned to minimize desert pavement disturbance. | | | The extent that the Project could create erosional or ecological impacts will be evaluated in the NEPA document. Implementation of dust control and soil and water resources mitigation measures and compliance with the Project SWPPP would reduce erosion impacts related to disturbance of desert pavement. Biological resources mitigation would require compensation for habitat impacts including ensuring that the habitat value of the compensation lands is comparable to the impacts. With implementation of the mitigation measures to be developed during the NEPA process, the effects to desert pavement would be insignificant and meet CMA LUPA-SW-9. The Project would comply with this CMA. |
| | **LUPA-SW-10** | The extent of additional sensitive soil areas (cryptobiotic soil crusts, hydric soils, highly corrosive soils, expansive soils, and soils at severe risk of erosion) shall be mapped if it is anticipated that an activity will impact these resources. To the extent possible, avoid disturbance of desert biologically intact soil crusts, and soils highly susceptible to wind and water erosion. | Yes | | The Project will comply with this CMA if sensitive soils are documented onsite. |
| | **LUPA-SW-11** | Where possible, side casting shall be avoided where road construction requires cut-and-fill procedures. | Yes | | The Project will comply with this CMA and will avoid side casting where road construction requires cut-and-fill procedures. |
| **Surface Water** | **LUPA-SW-12** | Except in DFAs, exclude long-term structures in, playas (dry lake beds), and Wild and Scenic River corridors, except as allowed with minor incursions (see definition in the Glossary of Terms). | No | Project is not located in or near the area specified in the CMA. | The Project is located in a DFA and would not place structures on a playa or a Wild and Scenic River corridor. |

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| | **LUPA-SW-13** | BLM will manage all riparian areas to be maintained at, or brought to, proper functioning condition. | Yes | | The CMA is specific to BLM actions.<br>Riparian areas would be managed by qualified biologists that would clearly demarcate work areas so no impacts would occur outside of the project limits. Temporarily impacted native vegetation would recover from rootstocks and temporarily disturbed areas would be revegetated per a Vegetation Resources Management Plan. Non-native invasives would be monitored and eradicated per the IWMP to prevent introduction or spread into adjacent areas. Impacts to native habitat would be mitigated in accordance with regulatory permits from the CDFW and RWQCB. Impacts to desert dry wash woodland would be avoided on private lands, as on BLM lands in accordance with the DREPC CMAs. Habitat impacts on BLM lands would also be mitigated in accordance with the DRECP and mitigation measures in the final NEPA document. |
| | **LUPA-SW-14** | All relevant requirements of Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands) will be complied with. | No | Project is not located in or near the area specified in the CMA. | The Project would not be located in a FEMA or Department of Housing and Urban Development (HUD) mapped floodplain, and Project construction is not proposed in wetlands, so this CMA does not apply. |
| | **LUPA-SW-15** | Surface water diversion for beneficial use will not occur absent a state water right. | No | Resource not found on the project site | Surface water diversion for beneficial use will not occur absent a state water right. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-SW-16** | The 100-year floodplain boundaries for any surface water feature in the vicinity of the project will be identified. If maps are not available from the Federal Emergency Management Agency (FEMA), these boundaries will be determined via hydrologic modeling and analysis as part of the environmental review process. Construction within, or alteration of, 100-year floodplains will be avoided where possible, and permitted only when all required permits from other agencies are obtained. | Yes | | FEMA flood insurance rate maps have not been prepared for the Project site or surrounding lands and the site does not lie within a federally mapped floodplain.<br>The Project will comply with this CMA. |
| **Groundwater** | **LUPA-SW-17** | An activity's groundwater extraction shall not contribute to exceeding the estimated perennial yield for the basin in which the extraction is taking place. Perennial yield is that quantity of groundwater that can be withdrawn from the groundwater basin without exceeding the long-term recharge of the basin or unreasonably affecting the basin's physical, chemical, or biological integrity. It is further clarified arithmetically below. | Yes | | A Water Supply Assessment is included in POD Appendix P. Groundwater Monitoring and Reporting and any potential impacts to the Chuckwalla Valley Groundwater Basin will be addressed with implement-ation of mitigation measures to be developed during the NEPA process. The Project will comply with this CMA. |
| | **LUPA-SW-18** | Water extracted or consumptively used for the construction, operation, maintenance, or remediation of the project shall be solely for the beneficial use of the project or its associated mitigation and remediation measures, as specified in approved plans and permits. | Yes | | The Project will comply with this CMA and follow all plan and permit stipulations regarding Project water use |
| | **LUPA-SW-19** | Water flow meters shall be installed on all extraction wells permitted by BLM. | Yes | | The Project will comply with this CMA and install a water flow meter if a water well is drilled at the Project site and permitted by BLM. |
| | **LUPA-SW-20** | After application of applicable avoidance and minimization measures, all remaining unavoidable residual impacts to surface waters from the proposed activity shall be mitigated to ensure no net loss of function and value, as determined by the BLM. | No | Resource not found on the project site | The Project would comply with BMPs and allow sheet flow through the sites. No unavoid-able residual impacts to sur-face waters are anticipated that would result in a net loss of function and value. |
| | **LUPA-SW-21** | Consideration shall be given to design alternatives that maintain the existing hydrology of the site or redirect excess flows created by hardscapes and reduced permeability from surface waters to areas where they will dissipate by percolation into the landscape. | Yes | | The Project would substan-tially maintain the existing hydrology of the area; minimal additional impermeable sur-faces are proposed. Therefore, the Project would comply with this CMA. |

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| | **LUPA-SW-22** | All hydrologic alterations shall be avoided that could reduce water quality or quantity for all applicable beneficial uses associated with the hydrologic unit in the project area, or specific mitigation measures shall be implemented that will minimize unavoidable water quality or quantity impacts, as determined by BLM in coordination with USFWS, CDFW, and other agencies, as appropriate. These beneficial uses may include municipal, domestic, or agricultural water supply; groundwater recharge; surface water replenishment; recreation; water quality enhancement; flood peak attenuation or flood water storage; and wildlife habitat. | Yes | | With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with the CMA. |
| | **LUPA-SW-23** | A Water (Groundwater) Supply Assessment shall be prepared in conjunction with the activity's NEPA analysis and prior to an approval or authorization. This assessment must be approved by the BLM in coordination with USFWS, CDFW, and other agencies, as appropriate, prior to the development, extraction, injection, or consumptive use of any water resource. The purpose of the Water Supply Assessment is to determine whether over-use or over-draft conditions exist within the project basin(s), and whether the project creates or exacerbates these conditions. The Assessment shall include an evaluation of existing extractions, water rights, and management plans for the water supply in the basin(s) (i.e., cumulative impacts), and whether these cumulative impacts (including the proposed project) can maintain existing land uses as well as existing aquatic, riparian, and other water-dependent resources within the basin(s). This assessment shall identify:<br>■ All relevant groundwater basins or sub-basins and their relationships.<br>■ All known aquifers in the basin(s), including their dimensions, whether confined or unconfined, estimated hydraulic conductivity and transmissivity, groundwater surface elevations, and direction and movement of groundwater.<br>■ All surface water basin(s) related to water runoff, delivery, and supply, if different from the groundwater basin(s).<br>■ All sites of surface outflow (springs or seeps) contained within the basin(s), including historic sites.<br>■ All other surface water bodies in the basins(s), including rivers, streams, ephemeral washes/drainages, lakes, wetlands, playas, and floodplains.<br>■ The water requirements of the proposed project and the source(s) of that water.<br>■ An analysis demonstrating that water of sufficient quantity and quality is available from identified source(s) for the life of the project.<br>■ An analysis of potential project-related impacts on water quality and quantity needed for beneficial uses, reserved water rights, existing groundwater users, or habitat management within or down gradient of the groundwater basin within which the project would be constructed.<br>■ The above analyses shall be in the form of a numerical groundwater model. The model extent shall encompass the groundwater basin within which the project would be constructed, and any groundwater-dependent resources within or down gradient of that basin. | Yes | | The Easley Project will complete a Water Supply Assessment. Per LUPA-SW-5, an exception to the CMA can be made if impacts are minimal; therefore, it is anticipated that the Water Supply Assessment satisfies this CMA and meets the intent of the DRECP resource management goals. |

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| | | The primary product of the Water Supply Assessment shall be a baseline water budget, which shall be established based on the best-available data and hydrologic methods for the identified basin(s). This water budget shall classify and describe all water inflow and outflow to the identified basin(s) or system using best-available science and the following basic hydrologic formula or a derivation: $P – R – E – T – G = \Delta S$<br>where P is precipitation and all other water inflow or return flow, R is surface runoff or outflow, E is evaporation, T is transpiration, G is groundwater outflow (including consumptive component of existing pumping), and ΔS is the change in storage. The volumes in this calculation shall be in units of either acre-feet per year or gallons per year. The water budget shall quantify the existing perennial yield of the basin(s). Perennial yield is defined arithmetically as that amount such that $P – R – E – T – G$ is greater than or equal to 0<br>Water use by groundwater-dependent resources is implicitly included in the definition of perennial yield. For example, in many basins the transpiration component (T) includes water use by groundwater-dependent vegetation. Similarly, groundwater outflow (G) includes discharge to streams, springs, seeps, and wetlands. If one or more budget components is altered, then one or more of the remaining components must change for the hydrologic balance to be maintained. For example, an increase in the consumptive component of groundwater pumping can lower the water table and reduce transpiration by groundwater-dependent vegetation. The groundwater that had been utilized by the groundwater-dependent vegetation would then be considered "captured" by groundwater pumping. Similarly, increased groundwater consumption can capture groundwater that discharges to streams, springs, seeps, wetlands and playas. These changes can occur slowly over time, and may require years or decades before the budget components are fully adjusted. Accordingly, the water/groundwater supply assessment requires that the best-available data and hydrologic methods be employed to quantify these budgets, and that groundwater consumption effects on groundwater-dependent ecosystems be identified and addressed.<br>The Water Supply Assessment shall also address:<br>■ Estimates of the total cone of depression considering cumulative drawdown from all potential pumping in the basin(s), including the project, for the life of the project through the decommissioning phase<br>■ Potential to cause subsidence and loss of aquifer storage capacity due to groundwater pumping<br>■ Potential to cause injury to other water rights, water uses, and land owners<br>■ Changes in water quality and quantity that affect other beneficial uses<br>■ Effects on groundwater dependent vegetation and groundwater discharge to surface water resources such as streams, springs, seeps, wetlands, and playas that could impact biological resources, habitat, or are culturally important to Native Americans | | | |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ▪ Additional field work that may be required, such as an aquifer test, to evaluate site specific project pumping impacts and if necessary, establish trigger points that can be used for a Groundwater Water Monitoring and Mitigation Plan<br>▪ The mitigation measures required, if there are significant or potentially significant impacts on water resources include but are not limited to, the use of specific technologies, management practices, retirement of active water rights, development of a recycled water supply, or water imports | | | |
| | **LUPA-SW-24** | A Groundwater Monitoring and Reporting Plan, and Mitigation Action Plan shall be prepared to verify the Water Supply Assessment and adaptively manage water use as part of project operations. This plan shall be approved by BLM, in coordination with USFWS, CDFW, and other agencies as appropriate, prior to the development, extraction, injection, or consumptive use of any water resource. The quality and quantity of all surface water and groundwater used for the project shall be monitored and reported using this plan. Groundwater monitoring includes measuring the effects of a project's groundwater extraction on groundwater surface elevations, groundwater flow paths, changes to groundwater-dependent vegetation, and of aquifer recovery after project decommissioning. Surface water monitoring, if applicable, shall monitor for changes in the flows, water volumes, channel characteristics, and water quality as a result of a project's surface water use. Monitoring frequency and geographic scope and reporting frequency shall be decided on a project and site-specific basis and in coordination with the appropriate agencies that manage the water and land resources of the region. The geographic scope may include at the very least, all basins/sub-basins that potentially receive inflow from the basin where the proposed project may be sited, and all basins/sub-basins that may potentially contribute inflow to the basin where the proposed project is located. The plan shall also detail any mitigation measures that may be required as a result of the project. This plan and all monitoring results shall be made available to BLM. BLM will make the plan and results available to USFWS, CDFW, and other applicable agencies. | Yes | | A Water Supply Assessment is included in POD Appendix P. Groundwater Monitoring and Reporting will be included in the mitigation measures developed during the NEPA process. The Project will comply with this CMA. |
| | **LUPA-SW-25** | Where groundwater extraction, in conjunction with other cumulative impacts in the basin, has potential to exceed the basin's perennial yield or to impact water resources, one or more "trigger points," or specified groundwater elevations in specific wells or surface water bodies, shall be established by BLM. If the groundwater elevation at the designated monitoring wells falls below the trigger point(s) (or exceeds the trigger pumping rate), additional mitigation measures, potentially including cessation of pumping, will be imposed. | Yes | | Use of water will be considered during the NEPA process and if deemed appropriate, trigger points may be required. The Project will comply with this CMA if required after additional study. |
| | **LUPA-SW-26** | Groundwater pumping mitigation shall be imposed if groundwater monitoring data indicate impacts on water-dependent resources that exceed those anticipated and otherwise mitigated for in the NEPA analysis and ROD, even if the basin's perennial yield is not exceeded. Water-dependent resources include riparian or phreatophytic vegetation, springs, seeps, streams, and other approved domestic or industrial uses of groundwater. Mitigation measures may include changes to pumping rates, volume, or timing of water withdrawals; coordinating and scheduling groundwater pumping activities in conjunction with other users in the basin; acquisition of project water from outside the basin; and/or replenishing the groundwater resource over a reason- | Yes | | A Water Supply Assessment is included in POD Appendix P. Groundwater Monitoring and Reporting and any potential impacts to the Chuckwalla Valley Groundwater Basin will be addressed with implementation of mitigation measures to be developed during the |

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| | | ably short timeframe. For permitted activities, permittees may also be required to contribute funds to basin-wide groundwater monitoring networks in basins such as those encompassed by the East Riverside DFA or in the Calvada Springs/South Pahrump Valley area, and to cooperate in the compilation and analysis of groundwater data. | | | NEPA process. The Project will comply with this CMA. |
| | **LUPA-SW-27** | Water-conservation measures shall be required in basins where current groundwater demand is high and has the future potential to rise above the estimated perennial yield (e.g., Pahrump Valley). These measures may include the use of specific technology, management practices, or both. A detailed discussion and analysis of the effectiveness of mitigation measures must be included. Application of these measures shall be detailed in the Groundwater Water Monitoring and Mitigation Plan. | Yes | | A Water Supply Assessment is included in POD Appendix P. Groundwater Monitoring and Reporting and any potential impacts to the Chuckwalla Valley Groundwater Basin will be addressed with implement-ation of mitigation measures to be developed during the NEPA process. The Project will comply with this CMA. |
| | **LUPA-SW-28** | Groundwater extractions from adjudicated basins, such as the Mojave River Basin, may be subject to additional restrictions imposed by the designated authority; examples include the Mojave Water Agency and San Bernardino County (see County Ordinance 3872). Where provisions of the adjudication allow for acquisition of water rights, project developers could be required to retire water rights at least equal in volume to those necessary for project operation or propose an alternative offset based on the conditions unique to the adjudicated basin. | No | Project is not located in or near the area specified in the CMA. | The Project is not located within an adjudicated basin. |
| | **LUPA-SW-29** | Groundwater pumping mitigation may be imposed if monitoring data indicate impacts on groundwater or groundwater-dependent habitats outside the DRECP area, including those across the border in Nevada. See **LUPA-SW-26** for potential mitigation measures. | No | Project is not lo-cated in or near the area speci-fied in the CMA. | The Project would have no impact on groundwater outside of the DRECP area. |
| | **LUPA-SW-30** | Activities shall comply with local requirements for any long term or short-term domestic water use and wastewater treatment. | Yes | | The Project will comply with this CMA by adhering to any applicable local requirements regarding domestic water use and wastewater treatment. |
| | **LUPA-SW-31** | The siting, construction, operation, maintenance, remediation, and abandonment of all wells shall conform to specifications contained in the California Department of Water Resources Bulletins #74-81 and #74-90 and their updates. | Yes | | Should a well be drilled on the Project site, the Project will comply with this CMA and its stated specification. |
| | **LUPA-SW-32** | Colorado River hydrologic basin - The concepts, principles and general methodology used in the Colorado River Accounting Surface Method, as defined in U.S. Geological Survey Scientific Investigations Report 2008-5113 (USGS 2009), and existing and future updates or a similar methodology, are considered the best available data for assessing activity/project related ground water impacts in the Colorado River hydrologic basin. The best available data and methodology shall be used to | Yes | | A Water Supply Assessment is included in POD Appendix P. Mitigation measures to be developed during the NEPA process will state that, if water for the Project is to be |

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| | | determine whether activity/project-related pumping would result in the extracted water being replaced by water drawn from the Colorado River. If activity/project-related groundwater pumping results in the static groundwater level at the well being near (within 1 foot), equal to, or below the Accounting Surface in a basin hydrologically connected to the Colorado River, that consumption shall be considered subject to the Law of the River (Colorado River Compact of 1922 and amendments). In such circumstances, BLM shall require the applicant to offset or otherwise mitigate the volume of water causing drawdown below the Accounting Surface. Details of such mitigation measures and the right to the use of water shall be described in the Groundwater Water Monitoring and Mitigation Plan. | | | obtained from onsite wells, the Applicant shall develop a Colorado River Water Supply Plan to monitor groundwater extractions and prevent, replace, or mitigate Project impacts that deplete the PVMGB groundwater budget. Mitigation measures will include groundwater monitor-ing and mitigation. The Project will comply with this CMA. |
| **Soil, Water, and Water-Dependent Resources Restricted to Specific Areas on BLM Lands** | **LUPA-SW-33** | **Stipulations for groundwater development in the proximity of Devils Hole**: Any development scenario for an activity within 25 miles of Devils Hole shall include a plan to achieve *zero-net* or *net-reduced* groundwater pumping to reduce the risk of adversely affecting senior federal reserved water rights, the designated critical habitat of the endangered Devils Hole pupfish, and the free-flowing requirements of the Wild and Scenic Amargosa River. This plan will require operators to acquire one or more minimization water rights (MWRs) in the over-appropriated, over-pumped, and hydraulically connected Amargosa Desert Hydrographic Basin in Nevada. The MWR(s) shall be: (1) an amount equal (at minimum) to that which is needed for construction and operations; (2) historically fully utilized, preferably for agricultural use; and (3) senior and closer to Devils Hole than the proposed point of diversion. | No | Project is not located in or near the area specified in the CMA. | The Project is not located within 25 miles of Devil's Hole. |
| | **LUPA-SW-34** | **Stipulations for groundwater development in the Calvada Springs/South Pahrump Valley area:** Activities in this area shall be required to acquire one or more MWRs in the Pahrump Valley Hydrographic Basin in Nevada. The acquired MWR(s) must: (1) be at least equal to the amount proposed to be required and actually used for project construction and operations; and (2) be fully utilized for at least the prior ten years. | No | Project is not located in or near the area specified in the CMA. | The Project is not located in the Calvada Springs/Couth Pahrump Valley area. |
| | **LUPA-SW-35** | Stipulations for activities in the vicinity of Death Valley National Park, Joshua Tree National Park, or Mojave National Preserve: The NEPA for activities involving ground-water extraction that are in the vicinity of Death Valley National Park, Joshua Tree National Park, or the Mojave National Preserve shall analyze and address any poten-tial impacts of groundwater extraction on Death Valley National Park, Joshua Tree National Park, or Mojave National Preserve. BLM will consult with the National Park Service on this process. The analysis or analyses shall include:<br>■ Potential impacts on the water balances of groundwater basins within these parks and preserves<br>■ A map identifying all potentially impacted surface water resources in the vicinity of the project, including a narrative discussion of the delineation methods used to discern those surface waters in the field<br>■ Any project-related modifications to surface water resources, both temporary and permanent<br>■ Analysis of any potential impacts on perennial streams, intermittent streams, and ephemeral drainages that could negatively impact natural riparian buffers | Yes | | The NEPA review will consider potential effects of ground-water pumping for the Project on nearby wells. The Project would not have an impact on surface or groundwater within Joshua Tree National Park, which is underlain by a different groundwater basin, the Pinto Valley Groundwater Basin. |

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| | | ▪ Impacts of any project proposed truncation, realignment, channelization, lining, or filling of surface water resources that could change drainage patterns, reduce available riparian habitat, decrease water storage capacity, or increase water flow velocity or sediment deposition, in particular where stormwater diverted around or through the project site is returned to natural drainage systems downslope of the project<br>▪ Any potential indirect project-related causes of hydrologic changes that could exacerbate flooding, erosion, scouring, or sedimentation in stream channels<br>▪ Alternatives and mitigation measures proposed to reduce or eliminate such impacts | | | |
| **Visual Resources Management** | **LUPA-VRM-1** | Manage Visual Resources in accordance with the VRM classes shown on Figure 9. | Yes | | Under the DRECP LUPA, the DFA where the Easley Project are located is classified as VRI Class IV, which allow for a high level of change. The Project will comply with this CMA. |
| | **LUPA-VRM-2** | Ensure that activities within each of the VRM Class polygons meets the VRM objectives described above, as measured through a visual contrast rating process. | Yes | | Under the DRECP LUPA, the DFA where the Easley Project is located is classified as VRI Class IV, which allow for a high level of change. The NEPA analysis will consider the visual contrast rating process. The Project will comply with this CMA. |
| | **LUPA-VRM-3** | Ensure that transmission facilities are designed and located to meet the VRM Class objectives for the area in which they are located. New transmission lines routed through designated corridors where they do not meet VRM Class Objectives will require RMP amendments to establish a conforming VRM Objective. All reasonable effort must be made to reduce visual contrast of these facilities in order to meet the VRM Class before pursing RMP amendments. This includes changes in routing, using lattice towers (vs. monopole), color treating facilities using an approved color from the BLM Environmental Color Chart CC-001 (dated June 2008, as updated on April 2014, or the most recent version) (vs. galvanized) on towers and support facilities, and employing other BMPs to reduce contrast. Such efforts will be retained even if an RMP amendment is determined to be needed. Visual Resource BMPs that reduce adverse visual contrast will be applied in VRM Class conforming situations. For a reference of BMPs for reducing visual impacts see the "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands", available at http://www.blm.gov/style/medialib/blm/wo/MINERALS__REALTY__AND_RESOURCE_PROTECTION_/energy/renewable_references.Par.1568.File.dat/RenewableEnergyVisualImpacts_BMPs.pdf, or the most recent version of the document or BMPs for VRM, as determined by BLM. | Yes | | Under the DRECP LUPA, the DFA where the Easley Project is located is classified as VRI Class IV, which allow for a high level of change. The Project will implement BMPs as necessary to comply with this CMA. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Wilderness Characteristics** | **LUPA-WC-1** | Complete an inventory of areas for proposed activities that may impact wilderness characteristics if an updated wilderness characteristics inventory is not available. | No | Project is not located in or near the area specified in the CMA. | There are no lands with wilderness characteristics on or adjacent to the Project. |
| | **LUPA-WC-2** | Employ avoidance measures as described under DFAs and approved transmission corridors. | No | Project is not located in or near the area specified in the CMA. | There are no lands with wilderness characteristics on or adjacent to the Project. |
| | **LUPA-WC-3** | For inventoried lands found to have wilderness characteristics but not managed for those characteristics compensatory mitigation is required if wilderness characteristics are directly impacted. The compensation will be:<br>■ 2:1 ratio for impacts from any activities that impact those wilderness characteristics, except in DFAs and transmission corridors<br>■ 1:1 ratio for impact from any activities that impact the wilderness characteristics in DFAs and transmission corridors<br>Wilderness compensatory mitigation may be accomplished through acquisition and donation, by willing landowners, to the federal government of (a) wilderness inholdings, (b) wilderness edge holdings that have inventoried wilderness character-istics, or (c) other areas within the LUPA Decision Area that are managed to protect wilderness characteristics. Restoration of impaired wilderness characteristics in Wilderness, Wilderness Study Area, and lands managed to protect wilderness characteristics could be substituted for acquisition. | No | Project is not located in or near the area specified in the CMA. | There are no lands with wilderness characteristics on or adjacent to the Project. |
| | **LUPA-WC-4** | For areas identified to be managed to protect wilderness characteristics, identified in Figure 7, the following CMAs are required:<br>■ Include a no surface occupancy stipulation for any leasable minerals with no exceptions, waivers, or modifications.<br>■ Exclude these areas from land use authorizations, including transmission.<br>■ Close areas to construction of new roads and routes. Vehicles will continue to be permitted on existing designated routes.<br>■ Close areas to mineral material sales.<br>■ Prohibit commercial or personal-use permits for extraction of materials (e. g. no wood-cutting permits).<br>■ Manage the area as VRM II.<br>■ Require that new structures and facilities are related to the protection or enhancement of wilderness characteristics or are necessary for the management of uses allowed under the land use plan.<br>■ Make lands unavailable for disposal from federal ownership. | No | Project is not located in or near the area specified in the CMA. | There are no lands with wilderness characteristics on or adjacent to the Project. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-WC-5** | Manage the following Wilderness Inventory Units to protect wilderness characteristics:<br>■ 132A-2 / 132A-3 / 132B / 136 / 136-1 / 145-1-1 / 145-2-1 / 145-3-1 / 149-2 / 150-2-2 / 158-1 / 158-2 / 159 / 159-1 / 159A-1 / 160 / 160-1 / 160B-2A / 160B-2B / 160B-2F / 160B-3A / 160B-4A / 160B-3B / 160B-4B / 170-1 / 170-3 / 193-1 / 206-1-1 / 206-1-2 / 206-1-3 / 206-1-4 / 222-2-1 / 251-1 / 251-1-1 / 251-1-2 / 251-2-2 / 251-3 / 251A / 252 / 259-1 / 259-2 / 266-1 / 276-1 / 276-3 / 277 / 277A-1 / 278 / 280 / 294-1 / 294-2 / 295 / 295A / 304-2 / 305-1 / 305-2 / 307-1 / 307-2 / 307-1-1 / 307-1-2 / 307-1-3 / 312-1 / 312-2 / 312-3 / 322-1 / 325-1 / 325-2 / 325-3 / 325-4 / 325-5 / 325-7 / 325-8 / 315-14 / 325-17 / 329 / 352-2 / 352A / 352A-1 / 354 / 355-1 / 355-2 / 355-3 | No | Project is not located in or near the area specified in the CMA. | There are no lands with wilderness characteristics on or adjacent to the Project. |

| Transmission | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Biological Resources** | **LUPA-TRANS-BIO-1** | Where feasible and appropriate for resource protection, site transmission activities along roads or other previously disturbed areas to minimize new surface disturbance, reduce perching opportunities for the Common Raven, and minimize collision risks for birds and bats. | Yes | | The Easley gen-tie line will be sited along disturbed areas using existing transmission line corridors and roads where available. The Easley gen-tie line will share the Oberon Project 500 kV line from the Oberon Substation to Red Bluff Substation. The Project will comply with this CMA. |
| | **LUPA-TRANS-BIO-2** | Flight diverters will be installed on all transmission activities spanning or within 1,000 feet of stream and wash channels, canals, ponds, and any other natural or artificial body of water. The type of flight diverter selected will be subject to approval by BLM, in coordination with USFWS and CDFW as appropriate, and will be based on the best available scientific and commercial data regarding the prevention of bird collisions with transmission and guy wires. | Yes | | The Easley gen-tie lines would not cross any streams, larger wash channels, or other natural or artificial bodies of water. However, there are artificial water sources in the Project vicinity and the gen-tie line would cross many small washes and areas of desert dry wash woodland habitat that birds may use for shelter. The Project will comply with this CMA. |
| | **LUPA-TRANS-BIO-3** | When siting transmission activities, the alignment should avoid, to the maximum extent practicable, being located across canyons or on ridgelines. Site and design sufficient distance between transmission lines to prevent electrocution of condors. | No | Project is not located in or near the area specified in the CMA. | The Easley gen-tie line would not cross canyons or ridgelines. |
| | **LUPA-TRANS-BIO-4** | Siting of transmission activities will be prioritized within designated utility corridors, where possible, and designed to avoid, where possible, and otherwise minimize and offset impacts to sand transport processes in Aeolian corridors, rare vegetation alliances and Focus and BLM Special Status Species. Transmission substations will be sited to avoid Aeolian corridors, rare vegetation alliances, and sand-dependent Focus and BLM Special Status Species habitats. | Yes | | The gen-tie line will be sited along disturbed areas using existing transmission line corri-dors and roads where available. The Project substation yard is not within aeolian corridors. The Project will comply with this CMA. |
| **Cultural Resources & Tribal Interests** | **LUPA-TRANS-CUL-1** | For transmission (and renewable energy) activities, require the applicant to pay all appropriate costs associated with the following processes, through the appropriate BLM funding mechanism:<br>■ All appropriate costs associated with the BLM's analysis of the DRECP geodatabase and other sources for cultural resources sensitivity.<br>■ All appropriate costs associated with preliminary sensitivity analysis. | Yes | | The existing cost-recovery agreements meet the requirements of this CMA. |

| Transmission | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ▪ All appropriate costs associated with the Section 106 process including the identification and defining of cultural resources. These costs may also include logistical, travel, and other support costs incurred by tribes in the consultation process.<br>▪ All appropriate costs associated with updating the DRECP cultural resources geodatabase with project specific results. | | | |
| | **LUPA-TRANS-CUL-2** | Consistent and in compliance with the NHPA Programmatic Agreement, signed February 5, 2016, or the most up to date signed version – for transmission (and renewable energy) activities, a compensatory mitigation fee will be required within the LUPA Decision Area to address cumulative and some indirect adverse effects to historic properties. The mitigation fee will be calculated in a manner that is commensurate to the size and regional impacts of the project. Refer to the NHPA Programmatic Agreement for details regarding the mitigation fee. | Yes | | This may be accomplished through mitigation measures developed through the Section 106 or NEPA process. The Project will comply with this CMA. |
| | **LUPA-TRANS-CUL-3** | For transmission (and renewable energy) activities, the management fee rate will be determined through the NHPA programmatic Section 106 consultation process that will be completed as part of the DRECP land use plan amendment. | Yes | | This may be accomplished through mitigation measures developed through the Section 106 or NEPA process. The Project will comply with this CMA. |
| | **LUPA-TRANS-CUL-4** | For transmission (and renewable energy) activities, demonstrate that results of cultural resources sensitivity, based on the DRECP geodatabase, and other sources, are used as part of the initial planning pre-application process and to select of specific footprints for further consideration. | Yes | | The CMA is an action to be taken by the BLM. |
| | **LUPA-TRANS-CUL-5** | For transmission (and renewable energy) activities, provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints. | Yes | | A BLM Class III archaeological survey will be completed for the Easley Project and along the gen-tie line and access route prior to the NEPA review, which exceeds the requirements of this CMA. The Project will comply with this CMA. |
| | **LUPA-TRANS-CUL-6** | For transmission (and renewable energy) activities, provide justification in the application why the project considerations merit moving forward if the specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM. | Yes | | Mitigation measures developed during the NEPA process will require reducing impacts of the Easley Project to cultural resources to the extent feasible. The Project will comply with this CMA. |

| Transmission | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-TRANS-CUL-7** | For transmission (and renewable energy) activities, complete the NHPA Section 106 Process as specified in 36 CFR Part 800, or via an alternate procedure, allowed for under 36 CFR Part 800.14 prior to issuing a ROD or ROW grant on any utility-scale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement. | Yes | | NHPA Section 106 compliance will be completed consistent with the DRECP PA. Section 106 compliance will be completed prior to the issuance of a Decision Record for the Project. The Project will comply with this CMA. |
| **Wilderness Characteristics** | **LUPA-TRANS-WC-1** | Allow transmission activities in areas inventoried and identified as lands with wilderness characteristics. | No | Project is not located in or near the area specified in the CMA. | The Project would not be located on lands identified as having wilderness characteristics. |
| | **LUPA-TRANS-WC-2** | For inventoried lands found to have wilderness characteristics impacted by transmission activities, compensatory mitigation is required at a 1:1 ratio if wilderness characteristics are directly impacted. This may be accomplished through acquisition and donation, from willing landowners, to the federal government of (a) wilderness inholdings, (b) wilderness edge holdings that have inventoried wilderness characteristics, or (c) other areas within the LUPA Decision Area that are managed to protect wilderness characteristics. Restoration of impaired wilderness characteristics in Wilderness, Wilderness Study Area, and lands managed to protect wilderness characteristics could be substituted for acquisition. | No | Project is not located in or near the area specified in the CMA. | The Project would not be located on lands identified as having wilderness characteristics. |

| Compensation | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **LUPA-COMP-1** | For third party actions, compensation activities must be initiated or completed within 12 months from the time the resource impact occurs (e.g. ground disturbance, habitat removal, route obliteration, etc. for construction activities; wildlife mortality, visual impacts, etc. due to operations).<br>■ BLM will determine, in the environmental analysis, the activity/project-level timing of the compensation (i.e. initiated, completed or a combination) based on the specific resources being impacted, and scope and content of the activity.<br>■ A 6-month extension may be authorized, subject to approval by the authorizing officer, dependent on the resources impacted and compensation due diligence of the project developer. | Yes | | The Applicant will develop a comprehensive habitat mitigation package. The Project will comply with this CMA should a third-party action causing a resource impact occur during construction or operations. |
| | **LUPA-COMP-2** | For BLM initiated activities, compensation activities will be initiated or completed within 12 months from the time the resource impact occurs (e.g. ground disturbance, habitat removal, route obliteration, etc. for construction activities; wildlife mortality, visual impacts, etc. due to operations), subject to federal budget appropriations.<br>■ BLM will determine, in the environmental analysis, the activity/project-level timing of its compensation (i.e. initiated, completed or a combination) based on the specific resources being impacted, and scope and content of its activity.<br>○ The estimated costs and 12-month timing of required compensation will be built into the activity/project design and environmental analysis. | No | Land use does not occur on project site. | The Project is not a BLM-initiated activity. |

| Ecological and Cultural Conservation | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Dune Vegetation Types, Aeolian Processes and Associated Species: North American Warm Desert Dune & Sand Flats** | **CONS-BIO-DUNE-1** | All long-term structures will be setback 0.25 mile from Aeolian corridors and Mojave fringe-toed lizard suitable habitat. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| | **CONS-BIO-DUNE-2** | All activities will be sited and/or configured to maintain the spatial extent, habitat quality, and ecological function of Aeolian transport corridors unless related to maintenance of existing (at the time of the DRECP LUPA ROD) facilities/activities. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| | | ▪ Roads will not be paved, unless paving is needed to meet another resource objective and Aeolian processes can be preserved. | No | Project is not located in or near the area specified in the CMA. | |
| | | ▪ Newly constructed roads and/or routes may be considered if they benefit minimization measures for natural, cultural and ecological resources of concern. | No | Project is not located in or near the area specified in the CMA. | |
| **Plant Focus & BLM Special Status Species** | **CONS-BIO-PLANT-1** | Occurrences of plant Focus and BLM Special Status Species, including in designated transmission corridors, will be avoided, to the maximum extent practicable (see "unavoidable impacts to resources" in the Glossary of Terms). | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| **Individual Focus Species: Desert Tortoise** | **CONS-BIO-IFS-1** | All activities, except transmission, that will result in the long-term removal of habitat supporting an adult desert tortoise density (i.e., individuals 160mm or more) of more than 5 per square mile or more than 35 individuals total are prohibited. The number of desert tortoises on an activity site will be based on estimates derived from the protocol surveys described previously using the USFWS's pre-activity survey protocol. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| | **CONS-BIO-IFS-2** | All activities, except transmission, in desert tortoise TCAs or linkages, as identified in Appendix D, that will result in long-term removal of habitat supporting more than 5 adult individuals are prohibited. The number of desert tortoises on-site is based on estimates derived from the protocol surveys described previously using the USFWS's pre-activity survey protocol. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| | **CONS-BIO-IFS-3** | Ground disturbance caps as per **Table 20** are reflected in the individual ACEC Special Unit Management Plans and maps in Appendix B**.** Refer to the California Desert National Conservation Lands, Section II.2.1, and ACECs, Section II.2.2, for a description of how the BLM Conservation Lands Ground Disturbance Cap will be applied, including measured, activity approval and the disturbance mitigation strategy. The same implementation methodology is repeated in CMAs NLCS-DIST-2 and ACEC-DIST-2. **Table 20** provides the specific desert tortoise conservation area and linkage ground disturbance caps in the BLM LUPA conservation designations. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |

| Ecological and Cultural Conservation | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Individual Focus Species: Gila Woodpecker** | **CONS-BIO-IFS-4** | All activities will be avoided in the vicinity of Corn Springs and Milpitas Wash, except as administratively necessary or necessary to support existing facilities, as determined by BLM, in order to protect previously occupied and future restored suitable nesting habitat for the Gila woodpecker. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| **Individual Focus Species: Golden Eagle** | **CONS-BIO-IFS-5** | The cumulative loss of foraging habitat within a 4 mile radius around active or alternative golden eagle nests will be limited to less than 10% in BLM LUPA conservation designations. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| **Individual Focus Species: Desert Bighorn Sheep** | **CONS-BIO-IFS-6** | BLM designated routes and trails will be appropriately seasonally signed to limit use to the routes and trails, if necessary to reduce impacts from recreational use to lambing and rearing. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| | **CONS-BIO-IFS-7** | For non-BLM Lessee's, domestic livestock will not be allowed to be trailed (transported on foot [herded]) through known or likely to be occupied bighorn sheep habitat, to minimize exposure and disease transmission to bighorn sheep. Vehicular movement of livestock will be allowable. Livestock will not be allowed to exit the vehicle transport, except in emergencies, while on BLM- administered land.<br>For BLM Lessee's, consistent with existing (at time of DRECP LUPA ROD) leases and allotment plans, domestic livestock will be controlled and moved to minimize exposure and disease transmission to bighorn sheep, using techniques including but not limited to fencing with adequate buffers, vehicle transport, and timing. Vehicular movement of livestock will be allowable. Livestock will remain in the vehicle transport, except in emergencies, while on BLM-administered land, unless at the destination.<br>For BLM grazing Lessee's, trailing of domestic sheep between discontiguous allotments, may be permittable if done in a manner, including timing, which prevents interaction with bighorn sheep and avoids disease transmission from domestic sheep to bighorn sheep.<br>At the time of grazing allotment lease and/or allotment plan renewal, a measure to eliminate trailing within allotments (movement of domestic livestock on foot or herding) through known or likely to be occupied bighorn sheep habitat will be considered and analyzed using the best available science on domestic livestock disease transmission to bighorn sheep. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| | **CONS-BIO-IFS-8** | To reduce the impact on bighorn sheep from domestic livestock in grazing allotments, BLM will:<br>■ Accept voluntarily retirement of allotments<br>■ Accept donation of allotments as one component of mitigation<br>■ Require specific terms and conditions in renewed grazing permits, as needed | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |

| Ecological and Cultural Conservation | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ▪ Consider converting domestic sheep allotments to cattle allotments<br>▪ Consistent with existing or renewed grazing allotment plans, remove or alter livestock fencing to enhance bighorn sheep movements. | | | |
| **Individual Focus Species: Mohave Ground Squirrel** | **CONS-BIO-IFS-9** | Long-term vegetation removal within key population centers and linkages from activities, requiring an EA or EIS, that may impact the Mohave ground squirrel is prohibited, unless the activity is compatible with Mohave ground squirrel conserva-tion and management. Compatible land uses are those described in the BLM LUPA for ACECs where Mohave ground squirrel occur. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| | **CONS-BIO-IFS-10** | To the maximum extent practicable (see Glossary of Terms) and/or as allowed under existing permits, establish and maintain fencing to exclude cattle, horses, sheep, and other potential grazers from areas that are protected and managed for Mohave ground squirrel and from vegetation stands that are important foraging habitat, including winterfat and spiny hopsage. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| **Comprehensive Trails & Travel Management** | **CONS-CTTM-1** | Refer to the individual California Desert National Conservation Lands and ACEC Special Unit Management Plans in Appendix A and B, respectively, for specific object-tives, management actions and allowable uses. Manage roads/trails consistent with California Desert National Conservation Lands/ACEC goals and objectives and as designated in Trails and Travel Management Plans (TTMPs) or Resource Management Plans (RMPs). | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| **Recreation & Visitor Services** | **CONS-REC-1** | In California Desert National Conservation Lands and ACECs that overlap with SRMAs and ERMAs, manage in accordance with the Special Unit Management Plans for the SRMA/ERMA and the applicable ecological and cultural conservation unit. If there is a conflict between the California Desert National Conservation Lands or ACEC management and the SRMA/ERMA management, the BLM will apply the most protective management (i.e., management that best supports natural and cultural resource conservation and limits impacts to the values for which the conservation unit was designated). | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| | **CONS-REC-2** | Maintain targeted recreation activities, experiences and benefits as consistent with the protection of the values for which the ecological and cultural conservation unit was designated. Maintain, and where possible enhance, the recreation setting characteristics: physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |
| | **CONS-REC-3** | Design public access features (access roads, roadside stops, trailheads, interpretive sites, etc.) to support or enhance conservation values for California Desert National Conservation Land units and ACECs. | No | Project is not located in or near the area specified in the CMA. | There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply. |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Comprehensive Trails &Travel Management** | **NLCS-CTTM-1** | **Comprehensive Trails and Travel Management –** Trails and Travel Management in California Desert National Conservation Lands will be in accordance with the applicable Transportation and Travel Management Plan. Future Transportation and Travel Management Plans for National Conservation Lands would be developed in accordance to the appropriate BLM guidance and policy. The California Desert National Conservation Land designation will be addressed in those subsequent plans with an emphasis on routes that provide for the conservation, protection, and restoration, as well as recreational use and enjoyment of the California Desert National Conservation Lands that is compatible with the values for which the areas were designated. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| **Cultural Resources & Tribal Interests** | **NLCS-CUL-1** | Any adverse effects to historic properties resulting from allowable uses will be addressed through the Section 106 process of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Resolution of adverse effects will in part be addressed via alternative mitigation that includes regional synthesis and interpretation of existing archaeological data in addition to mitigation measures determined through the Section 106 consultation process. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| **Ground Disturbance Caps** | **NLCS-DIST-1** | **Ground Disturbance Caps –** Development in California Desert National Conservation Lands are limited by the 1% ground disturbance cap which is the total ground disturbance (existing [past and present] plus future), or to the level allowed by collocated ACEC(s) with its smaller ground disturbance cap units, whichever is more restrictive. Refer to Appendix B for the ACEC Special Unit Management Plans. The ground disturbance caps will be used, managed and implemented following the methodology in the California Desert National Conservation Lands and ACEC land allocation sections, and repeated in, **NLCS-DIST-2** and **ACEC-DIST-2**. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-DIST-2** | **Ground Disturbance Cap Management and Implementation.** Specifically, the ground disturbance caps would be implemented as a limitation and objective using the following process:<br>▪ Limitation: If the ground disturbance condition of the California Desert National Conservation Lands and/or ACEC unit is below the designated ground disturbance cap (see calculation method), the ground disturbance cap is a limitation on ground-disturbing activities within the California Desert National Conservation Lands and/or ACEC, and precludes approval of future discretionary ground disturbing activities (see exceptions below) above the cap.<br>▪ Objective, triggering disturbance mitigation: If the ground disturbance condition of the California Desert National Conservation Lands and/or ACEC is at or above its designated cap, the cap functions as an objective, triggering the specific ground disturbance mitigation requirement. Ground disturbance mitigation is unique to ground disturbance cap implementation and a discrete form of compensatory mitigation, separate from other required mitigation in the DRECP LUPA (see Glossary of Terms). The ground disturbance mitigation requirement remains in effect for all (see exceptions below) activities until which time the California Desert National Conservation Lands and/or ACEC drops below the cap, at which time the cap becomes a limitation and the ground disturbance mitigation is no longer a | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |

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| | | requirement. If ground disturbance mitigation opportunities do not exist in a unit (see below for "unit" of measurement), ground disturbing activities (see exceptions below) will not be allowed in that unit until which time opportunities for ground disturbance mitigation in the unit become available (see types and forms of ground disturbance mitigation below) or the unit recovers and drops below the cap.<br><br>■ Actions necessary to control the immediate impacts of an emergency that are urgently needed to reduce the risk to life, property, or important natural, cultural, or historic resources, in accordance with 43 Code of Federal Regulations (CFR) 46.150, are an exception to the ground disturbance cap limitation, objective and ground disturbance mitigation requirements. Ground disturbance from emergency actions will count in the ground disturbance calculation for other activities, and also be available for ground disturbance mitigation opportunities and restoration, as appropriate.<br><br>**Calculating ground disturbance:** Ground disturbance will be calculated on BLM managed land at the time of an individual proposal, by BLM for a BLM initiated action or by a third party for an activity needing BLM approval or authorization, for analysis in the activity-specific National Environmental Policy Act (NEPA) document. Once BLM approves/accepts or conducts a calculation for a ACEC, that calculation is considered the baseline of past and present disturbance and is valid for 12 months, and can be used by other proposed activities in the same unit. Ground disturbances, that meet the criteria below, would be added into the calculation for the 12-month period without having to revisit the entire calculation. After a 12-month period has passed and a proposed action triggers the disturbance calculation, BLM will examine the existing ground disturbance calculation to determine: 1) if the calculation is still reliable, in which case add in any additional disturbance that has occurred since that calculation; or 2) if the disturbance must be recalculated in its entirety. Once completed for a specific activity, the ground disturbance calculation may be used throughout the activity's environmental analysis. However, the BLM may recalculate the affected unit(s) or portions of the unit(s) if it determines such recalculation is necessary for the BLM's environmental analysis.<br><br>**Unit of measurement:** When calculating the ground disturbance, it is necessary to identify the appropriate unit level at which the disturbance will be calculated. For ground disturbing activities that occur within California Desert National Conservation Lands, the disturbance calculation will be based on the California Desert National Conservation Lands, ACEC unit boundary, or the boundary of the disturbance cap area(s), whichever area is smaller. If there is overlap between California Desert National Conservation Lands and an ACEC, the calculation will take place based on the smallest unit. If an activity/project overlaps two or more smaller units, the cap will be calculated, individually, for all affected units. | | | |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | **Ground disturbance includes:** The calculation shall include existing ground disturbance in addition to the estimated ground disturbance from the proposed activity (future) determined at the time of the individual proposal:<br>■ Authorized/approved ground disturbing activities – built and not yet built<br>■ BLM identified routes – all routes, trails, etc., authorized and unauthorized, identified in the Ground Transportation Linear Feature (GTLF) and/or other BLM route network database (i.e., BLM local databases that contain the best available data on routes and trails, replacement for GTLF, etc.), following applicable BLM standards and policy for identification of routes (authorized and unauthorized)<br>■ Assumptions may be used to identify the percentage/degree/area/etc. of ground disturbance for a specific authorized/approved activity or activity-type based on:<br>o Activity-specific environmental analysis, such as NEPA or ESA Section 7 Biological Assessment<br>o Known and documented patterns of ground disturbance<br>o Other documented site-specific factors that limit or play a role in ground disturbance, such as topography, geography, hydrology (e.g. desert washes obliterating authorized routes on a regular basis), historical and predicted patterns of use<br>■ Any unauthorized disturbance that can be seen at a 1:10,000 scale using the best available aerial imagery<br>■ Ground disturbance from wildfire, animals, or other disturbances that can be seen at a 1:10,000 scale using the best available aerial imagery<br>■ Historic Route 66 maintenance - potential ground disturbance estimates:<br>o As part of the ground disturbance calculation, the potential disturbance associated with estimated operations related to the maintenance of Historic Route 66 will automatically be included in the ground disturbance calculation as existing ground disturbance for the units specified below, until which time these estimated acres are no longer necessary due to approved operations:<br>– South Amboy-Mojave California Desert National Conservation Lands 221 acres<br>– Bristol Mountains ACEC 92 acres<br>– Chemehuevi ACEC 43 acres<br>– Pisgah ACEC 86 acres<br>o The estimated ground disturbance acreage includes disturbance associated with potential access to the locations if no current access exists.<br>o The estimated ground disturbance acres for maintenance of Historic Route 66 in the before mentioned conservation units is not approval of these activities by BLM. Activities associated with the management and mainte- | | | |

| Category | CMA # | CMA Text | Applica-bility | Explanation: Why CMA is not applicable | Comments |
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| | | nance of Historic Route 66 on BLM administered land will follow all applicable laws, regulations and policies.<br><br>**Exceptions to the disturbance calculation:**<br><br>■ Actions necessary to control the immediate impacts of an emergency that are urgently needed to reduce the risk to life, property, or important natural, cultural, or historic resources, in accordance with 43 CFR 46.150, will not be required to conduct a disturbance calculation. If the actions are ground disturbing, that disturbance will count towards the disturbance cap when next calculated for non-emergency activities.<br><br>■ Actions that are authorized under a Department of Interior (DOI) or BLM NEPA Categorical Exclusion will not be required to conduct a disturbance calculation; however, these actions are not exempt from the disturbance mitigation requirement if a unit is at or above its cap. Although the BLM is not required to calculate the disturbance cap before approving an activity under a Categorical Exclusion, if the BLM knows an area is at or exceeding the cap, the disturbance mitigation requirements would apply to that activity.<br><br>■ BLM authorized/approved research or restoration activities that are designed or intended to promote and enhance the nationally significant landscape values for which the California Desert National Conservation Land was designated.<br><br>■ Actions that are entirely within the footprint of an existing authorized/approved site of ground disturbance that is within the calculation above.<br><br>■ Livestock grazing permit renewals (however, water developments or other range improvements requiring an Environmental Assessment or Environmental Impact Statement would be subject to the disturbance calculation and any mitigation requirements).<br><br>**Ground disturbance mitigation:** The purpose of ground disturbance mitigation (disturbance mitigation) is to allow actions to occur in California Desert National Conservation Lands and/or ACEC that is at or above its designated disturbance cap(s), while at the same time providing a restoration mechanism that will, over time, improve the condition of the unit(s) and take them below their cap. Disturbance mitigation is compensatory. Disturbance mitigation is unique to ground disturbance cap implementation and a discrete form of compensatory mitigation, separate from other required mitigation in the DRECP (see Glossary of Terms).<br><br>Disturbance mitigation may only be used for ground disturbance that is otherwise allowed by the LUPA and consistent with the purposes for which the California Desert National Conservation Lands and/or ACEC was designated. Areas used for disturbance mitigation are still considered disturbed until which time they meet the "Ground Disturbance Recovery" criteria in the description below.<br><br>**Unit for implementing disturbance mitigation:** The appropriate unit level for implementing disturbance mitigation is the same as that used for calculating ground disturbance. For ground disturbing activities that occur within California Desert | | | |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | National Conservation Lands, the disturbance mitigation will be required within the California Desert National Conservation Lands, ACEC boundary, or the boundary of the disturbance cap area(s), whichever area is smaller. If there is overlap between California Desert National Conservation Lands and an ACEC, the disturbance mitigation will take place in the smallest unit. If an activity/project overlaps two or more smaller units, disturbance mitigation will be required for all units that are at or over their specified disturbance cap.<br>**No disturbance mitigation required:** If the calculated ground disturbance for the unit(s) is under the cap:<br>■ No disturbance mitigation required; use activity design features to minimize new ground disturbance and help stay below cap.<br>**Disturbance mitigation required:** If the calculated ground disturbance is at or above the unit(s) cap, disturbance mitigation is required:<br>■ Use activity design features to minimize new ground disturbance to the extent practicable.<br>■ For the portion of the proposed activity that is located on land within an area previously disturbed by an authorized/approved action that has been terminated the required disturbance mitigation ratio is 1.5 (1½):1.<br>■ For the portion of the proposed activity that is located on undisturbed land or land disturbed by unauthorized activities, the required disturbance mitigation ratio is 3:1.<br>■ Although the BLM is not required to calculate the ground disturbance cap before approving/authorizing an activity under a Categorical Exclusion, if the BLM knows an area is at or exceeding the cap, the disturbance mitigation requirements would apply to that activity.<br>■ In the rare circumstance where the BLM authorizes activities on areas restored (e.g., as disturbance or other forms of mitigation), the required disturbance mitigation ratio requirement is doubled, that is, 3:1 or 6:1, respectively.<br>■ If disturbance mitigation opportunities do not exist in a unit, ground-disturbing activities (see exceptions below) will not be allowed in that unit until which time opportunities for disturbance mitigation in the unit become available (see types and forms of disturbance mitigation below) or the unit recovers and drops below the cap.<br>**Exceptions to the disturbance mitigation requirement:**<br>■ Any portion of the proposed activity that is located on land previously disturbed by an existing, valid authorized/approved action.<br>■ Livestock grazing permit renewals (however, water developments or other range improvements requiring an Environmental Assessment or Environmental Impact | | | |

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| | | Statement would be subject to the disturbance calculation and any mitigation requirements).<br>■ Land use authorization assignments and renewals with no change in use.<br>■ BLM authorized/approved activities that are designed and implemented to reduce existing ground disturbance, such as ecological, cultural, or habitat restoration or enhancement activities.<br>■ Non-discretionary actions, where BLM has no authority to require compensatory mitigation.<br>**Types and forms of disturbance mitigation:**<br>■ Restoration of previously disturbed BLM lands within the boundary of the specific California Desert National Conservation Lands and/or ACEC unit(s) being impacted.<br>■ Acquisition of undisturbed lands within the boundary of the specific California Desert National Conservation Lands and/or ACEC unit being impacted.<br>■ Ground disturbance mitigation can be "nested" (i.e., combined) with other resource mitigation requirements, when appropriate. For example, a parcel restored for desert tortoise habitat mitigation may also satisfy the disturbance mitigation requirement if the parcel is within the appropriate unit of California Desert National Conservation Lands, ACEC boundary, or smaller disturbance cap unit.<br>**Ground Disturbance Recovery**<br>In general, California Desert National Conservation Lands and/or ACEC ground disturbance recovery would be determined during the decadal ground disturbance threshold ecoregion trend monitoring assessments (see below, and Monitoring and Adaptive Management). California Desert National Conservation Lands and/or ACEC recovery may be assessed at intermediate intervals, in between the decadal assessments, at BLM's discretion based on adequate funding and staffing. Between the decadal assessments, BLM will assume disturbed areas and units (same as used for calculations and mitigation) are not yet recovered until data is presented and BLM determines the area meets one of the two criteria below:<br>■ Field verification that disturbed area(s) are dominated by the establishment of native shrubs, as appropriate for the site, and demonstrated function of ecological processes (e.g., water flow, soil stability).<br>■ Ground disturbance can no longer be seen at the 1:10,000 scale using the best available aerial imagery.<br>Areas within California Desert National Conservation Lands and/or ACEC(s) may be determined recovered by BLM at any time, once one of the two criteria above are met, prior to the entire unit (of calculation and mitigation) being determined recovered. Areas determined recovered by BLM would be removed from the subsequent ground disturbance calculation for that unit. | | | |

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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Lands & Realty** | **NLCS-LANDS-1** | Renewable energy activities and related ancillary facilities are not allowed. New transmission and interconnect (i.e. generation tie lines) lines are allowed in designated corridors only. California Desert National Conservation Lands are a right-of-way avoidance areas for all other land use authorizations. Right-of-way avoidance areas are defined as areas to be avoided but may be available for location of right-of-ways with special stipulations. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-LANDS-2** | Avoid use authorizations that negatively affect the values for which the California Desert National Conservation Lands are designated, unless mitigation, including compensatory mitigation, result in a net benefit to the California Desert National Conservation Lands. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-LANDS-3** | Public access will be designed to facilitate or enhance the use, enjoyment, conservation, protection, and restoration of California Desert National Conservation Land values identified for the ecoregion. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-LANDS-4** | All lands within California Desert National Conservation Lands are identified for retention. If the BLM determines that disposal through exchange would result in a net benefit to the values of the California Desert National Conservation Lands, it may consider that exchange through a land use plan amendment. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-LANDS-5** | Site authorizations that protect or enhance conservation values, such as those granted as compensatory mitigation or for habitat restoration, are allowed. Compensatory mitigation measures sited on California Desert National Conservation Lands are not to be limited to mitigation for activities on BLM-managed public land. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| **Minerals** | **NLCS-MIN-1** | **High Potential Mineral Areas**<br>■ In California Desert National Conservation Lands and ACECs, determine if reasonable alternatives exist outside of the California Desert National Conservation Lands and ACECs prior to proposing mineral resource development within one of these areas.<br>■ In California Desert National Conservation Lands, subject to valid existing rights, if mineral resource development is proposed on a parcel of public land administered by the BLM for conservation purposes and designated as part of the NLCS within the CDCA, pursuant to Omnibus Public Land Management Act Section 2002(b)(2)(D):<br>○ Identify, analyze, and consider the resources and values for which that parcel of public land is administered for conservation purposes.<br>○ Determine whether development of mineral resources is compatible with the BLM's administration of that parcel of public land for conservation | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |

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| | | purposes. If development is incompatible, the mineral resource would not be developed, subject to valid existing rights.<br>○ Approve any operation for which valid existing rights have been determined, subject to the applicable CMAs in the DRECP LUPA, including LUPA-MIN-1 through 6.<br>■ In California Desert National Conservation Lands, to protect the values for which a California Desert National Conservation Land unit was designated, and avoid, minimize, and compensate impacts to those values that results in net benefit for California Desert National Conservation Lands values, all Plans of Operation will meet the performance standards found at 43 CFR 3809.420, specifically 43 CFR 3809.420(a)(3)—Land-use plans, and 43 CFR 3809.420(b)(7)—Fisheries, wildlife and plant habitat, and will be subject to the regulations found at 43 CFR 3809.100 and 43 CFR 3809.101, if applicable. | | | |
| | **NLCS-MIN-2** | For the purposes of locatable minerals, California Desert National Conservation Lands are treated as "controlled" or "limited" use areas in the CDCA, requiring a Plan of Operations for greater than casual use under 43 CFR 3809.11. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-MIN-3** | California Desert National Conservation Lands are available for mineral material sales and solid mineral leases, and would require mitigation, including compensatory mitigation, that results in net benefit for California Desert National Conservation Lands values consistent with applicable statutes and regulations. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-MIN-4** | California Desert National Conservation Lands are available for geothermal leasing only in the specified areas where a DRECP LUPA DFA overlaps with the California Desert National Conservation Lands and the geothermal lease contains a specific no surface occupancy stipulation. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-MIN-5** | Geothermal and other leasing must protect groundwater quality and quantity. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| **National Scenic & Historic Trails** | **NLCS-NSHT-1** | **Management of National Scenic and Historic Trails –** Manage National Scenic and Historic Trails as units of the BLM's NLCS per PL 111-11, and components of the National Trails System under the National Trails System Act. Where National Scenic and Historic Trails overlap California Desert National Conservation Lands or other NLCS units (e.g., Wilderness Areas), the more protective CMAs or land use allocations apply. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |

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| | **NLCS-NSHT-2** | **Management Corridor –** The National Trail Management Corridor, on BLM land, has a width generally 1 mile from the centerline of the trail, 2-mile total width. Where the National Trail Management Corridors overlap California Desert National Conservation Lands or other NLCS units, the more protective CMAs or land use allocations will apply. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-3** | **Site Authorization –** NSHT Management Corridors are right-of-way avoidance areas for land use authorizations. Sites authorizations will require mitigation, including compensatory mitigation resulting in net benefit to the NSHT. Authorizations that interfere with the Nature and Purpose for which the NSHT was established are not to be allowed, as required by the National Trail Systems Act. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-4** | **Linear Rights-of-Way –** Generally, the NSHT Management Corridors are avoidance areas for linear rights-of-way, except in existing designated transmission/utility corridors, which are available for linear rights-of-way. Cultural landscapes, high potential historic sites, and high potential route segments within or along National Historic Trail Management Corridors are excluded from transmission activities, except in existing designated transmission/utility corridors. For all linear rights-of-way adversely impacting NSHT Management Corridors, the BLM will follow the protocol in BLM Manual 6280 to coordinate, as required, and complete an analysis showing that the development does not substantially interfere with the nature and purposes of the NSHT, and that mitigation results in a net benefit to the NSHT. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-5** | **Renewable Energy Rights-of-Way –** Renewable energy activities are not to be allowed within NSHT Management Corridors, except in LUPA approved DFAs. Where development may adversely impact NSHT Management Corridors, the BLM will follow the protocol in BLM Manual 6280 as required and complete an analysis to ensure that it does not substantially interfere with the nature and purposes of the NSHT, avoids activities incompatible with NSHT nature and purposes, and that mitigation, including compensatory mitigation, results in a net benefit to the NSHT. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-6** | **Land Tenure –** All lands within NSHT Management Corridors are identified for retention. If the BLM determines that disposal through exchange would result in a net benefit to the values of the NSHT, it may consider that exchange through a land use plan amendment. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-7** | **Locatable Minerals –** For the purposes of locatable minerals, NSHT Management Corridors are treated as "controlled" or "limited" use areas in the CDCA, requiring a Plan of Operations for greater than casual use under 43 CFR 3809.11. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-8** | **Mineral Material Sales –** NSHT Management Corridors are available for mineral material sales if the sale does not conflict or cause adverse impact on resources, qualities, values, settings, or primary uses or substantially interfere with nature and | No | Project is not located in or near the area | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |

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| | | purpose of NSHT, and avoids activities inconsistent with NHST purposes. The sale must require mitigation/compensation and must result in net benefit to NSHT values. | | specified in the CMA. | |
| | **NLCS-NSHT-9** | **Solid Mineral Leases –** NSHT Management Corridors will be available for solid mineral leases if the lease does not conflict or cause adverse impact on resources, qualities, values, settings, or primary uses or substantially interfere with nature and purpose of NSHT, and avoids activities inconsistent with NHST purposes. The lease must require mitigation/compensation and result in net benefit to NSHT values. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-10** | **Geothermal Leasable Minerals –** NSHT Management Corridors are available for geothermal leasing in LUPA approved DFAs only and with a no surface occupancy stipulation, as long as the action would not substantially interfere with the nature and purposes of the NSHT, and will follow the most recent national policy and guidance. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-11** | **Recreation and Visitor Services –** Commercial and competitive Special Recreation is a discretionary action and will be considered on a case-by-case basis for activities consistent with the NSHT nature and purposes. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-12** | **Cultural Resources –** Any adverse effects to historic properties resulting from allowable uses will be addressed through the Section 106 process of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-13** | **Cultural Resources –** All high potential NHT segments will be assumed to contain remnants, artifacts and other properties eligible for the National Register of Historic Places, pending evaluation. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-14** | **Visual Resources Management –** All NSHT Management Corridors are designated as VRM Class I or II dependent on the CMA's or land use allocation, except within existing approved transmission/utility corridors (VRM Class III) and DFAs (VRM Class IV). However, state of the art VRM BMPs for renewable energy will be employed commensurate with the protection of nationally significant scenic resources and cultural landscapes to minimize the level of intrusion and protect trail settings. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-NSHT-15** | **Mitigation Requirements –** If there is overlap between a National Scenic or Historic Trail, National Trail Management Corridor on BLM land, or trail under study for possi-ble designation and a DFA, BLM Manual 6280 must be followed. Efforts will be made to avoid conflicting activities and approved activities will be subject to mitigation for adverse impacts to the resources, qualities, values, settings, and primary use or uses (RQVs), including, but not limited to, the following: avoidance, the cost of trail reloca-tion, on-site mitigation and off-site mitigation. Compensation can include acquisition or restoration of corridor RQVs, features and landscapes will be at a minimum of 2:1, | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |

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| | | and must result in a net benefit to the overall trail corridor. Proposed development of high potential route segments must not substantially interfere with the nature and purposes of the National Scenic or Historic Trail. | | | |
| **Recreation & Visitor Services** | **NLCS-REC-1** | Commercial and competitive Special Recreation Permits are a discretionary action and will be issued on a case-by-case basis, for activities that do not diminish the values of the California Desert National Conservation Lands unit and will be prohi-bited if the proposed activities would adversely impact the nationally significant ecological, cultural or scientific values for which the area was designated. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |
| | **NLCS-SW-1** | Apply for water rights on a case-by-case basis to protect water dependent California Desert National Conservation Land values. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply. |

| ACECs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Cultural Resources & Tribal Interests** | **ACEC-CUL-1** | Survey, identify and record new cultural resources within ACEC boundaries prioritizing ACECs where the relevant and important criteria include cultural resources. | No | Project is not located in or near the area specified in the CMA. | The Easley Project gen-tie line terminates at the Oberon Substation and will utilize the Oberon 500 kV line to transmit the power generated by Easley from the Oberon Substation to Red Bluff Substation. Therefore, Easley will not impact the Chuckwalla ACEC south of I-10. |
| | **ACEC-CUL-2** | Update records for existing cultural resources within ACECs, prioritizing ACECs where the relevant and important criteria include cultural resources. | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |
| | **ACEC-CUL-3** | Develop baseline assessment of specific natural and man-made threats to cultural resources in ACECs (i.e., erosion, looting and vandalism, grazing, OHV), prioritizing ACECs where the relevant and important criteria include cultural resources. | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |
| | **ACEC-CUL-4** | Provide on-going monitoring for cultural resources based on the threat assessment, prioritizing ACECs where the relevant and important criteria include cultural resources. | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |
| | **ACEC-CUL-5** | Identify, develop or incorporate standard protection measures and best management practices to address threats. | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |
| | **ACEC-CUL-6** | Where specific threats are identified, implement protection measures consistent with agency NHPA Section 106 responsibilities. | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |
| **Ground Disturbance Cap** | **ACEC-DIST-1** | Development in ACECs is limited by specified ground disturbance caps which are the total ground disturbance (existing [past and present] plus future). The specific ACEC ground disturbance caps are delineated in each of the individual ACEC Special Unit Management Plans (Appendix B). The ground disturbance caps will be used, managed and implemented following the methodology for California Desert National Conservation Lands and ACECs identified in Section II.2 and repeated in CMAs **NLCS-DIST-2**, and **ACEC-DIST-2**. | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |

| ACECs | | | | | |
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| | **ACEC-DIST-2** | Specifically, the ground disturbance caps would be implemented as a limitation and objective using the following process:<br>■ Limitation: If the ground disturbance condition of the ACEC is below the designated ground disturbance cap (see calculation method), the ground disturbance cap is a limitation on ground-disturbing activities within the California Desert National Conservation Lands and/or ACEC, and precludes approval of future discretionary ground disturbing activities (see exceptions below) above the cap.<br>■ Objective, triggering disturbance mitigation: If the ground disturbance condition of the ACEC is at or above its designated cap, the cap functions as an objective, triggering the specific ground disturbance mitigation requirement. Ground disturbance mitigation is unique to ground disturbance cap implementation and a discrete form of compensatory mitigation, separate from other required mitigation in the DRECP LUPA (see Glossary of Terms). The ground disturbance mitigation requirement remains in effect for all (see exceptions below) activities until which time the ACEC drops below the cap, at which time the cap becomes a limitation and the ground disturbance mitigation is no longer a requirement. If ground disturbance mitigation opportunities do not exist in a unit (see below for "unit" of measurement), ground disturbing activities (see exceptions below) will not be allowed in that unit until which time opportunities for ground disturbance mitigation in the unit become available (see types and forms of ground disturbance mitigation below) or the unit recovers and drops below the cap.<br>■ Actions necessary to control the immediate impacts of an emergency that are urgently needed to reduce the risk to life, property, or important natural, cultural, or historic resources, in accordance with 43 Code of Federal Regulations (CFR) 46.150, are an exception to the ground disturbance cap limitation, objective and ground disturbance mitigation requirements. Ground disturbance from emergency actions will count in the ground disturbance calculation for other activities, and also be available for ground disturbance mitigation opportunities and restoration, as appropriate.<br>**Calculating ground disturbance:** Ground disturbance will be calculated on BLM managed land at the time of an individual proposal, by BLM for a BLM initiated action or by a third party for an activity needing BLM approval or authorization, for analysis in the activity-specific National Environmental Policy Act (NEPA) document. Once BLM approves/accepts or conducts a calculation for a ACEC, that calculation is considered the baseline of past and present disturbance and is valid for 12 months, and can be used by other proposed activities in the same unit. Ground disturbances, that meet the criteria below, would be added into the calculation for the 12 month period without having to revisit the entire calculation After a 12 month period has passed and a proposed action triggers the disturbance calculation, BLM will examine the existing ground disturbance calculation to determine: 1) if the calculation is still reliable, in which case add in any additional disturbance that has occurred since that calculation; or 2) if the disturbance must be recalculated in its entirety. Once completed for a specific activity, the ground disturbance calculation may be used throughout the | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |

| ACECs | | | | | |
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| | | activity's environmental analysis. However, the BLM may recalculate the affected unit(s) or portions of the unit(s) if it determines such recalculation is necessary for the BLM's environmental analysis.<br><br>**Unit of measurement:** When calculating the ground disturbance, it is necessary to identify the appropriate unit level at which the disturbance will be calculated. For ground disturbing activities that occur within an ACEC, the disturbance calculation will be based on the ACEC unit boundary, or the boundary of the disturbance cap area(s), whichever area is smaller. If there is overlap between California Desert National Conservation Lands and an ACEC, the calculation will take place based on the smallest unit. If an activity/project overlaps two or more smaller units, the cap will be calculated, individually, for all affected units.<br><br>**Ground disturbance includes:** The calculation shall include existing ground disturbance in addition to the estimated ground disturbance from the proposed activity (future) determined at the time of the individual proposal:<br>■ Authorized/approved ground disturbing activities – built and not yet built<br>■ BLM identified routes – all routes, trails, etc., authorized and unauthorized, identified in the Ground Transportation Linear Feature (GTLF) and/or other BLM route network database (i.e., BLM local databases that contain the best available data on routes and trails, replacement for GTLF, etc.), following applicable BLM standards and policy for identification of routes (authorized and unauthorized)<br>■ Assumptions may be used to identify the percentage/degree/area/etc. of ground disturbance for a specific authorized/approved activity or activity-type based on:<br>○ Activity-specific environmental analysis, such as NEPA or ESA Section 7 Biological Assessment<br>○ Known and documented patterns of ground disturbance<br>○ Other documented site-specific factors that limit or play a role in ground disturbance, such as topography, geography, hydrology (e.g. desert washes obliterating authorized routes on a regular basis), historical and predicted patterns of use<br>■ Any unauthorized disturbance that can be seen at a 1:10,000 scale using the best available aerial imagery<br>■ Ground disturbance from wildfire, animals, or other disturbances that can be seen at a 1:10,000 scale using the best available aerial imagery<br>■ Historic Route 66 maintenance - potential ground disturbance estimates:<br>○ As part of the ground disturbance calculation, the potential disturbance associated with estimated operations related to the maintenance of Historic Route 66 will automatically be included in the ground disturbance calculation as existing ground disturbance for the units specified below, | | | |

| Category | CMA # | CMA Text | Applica-bility | Explanation: Why CMA is not applicable | Comments |
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| | | until which time these estimated acres are no longer necessary due to approved operations:<br>– South Amboy-Mojave California Desert National Conservation Lands 221 acres<br>– Bristol Mountains ACEC 92 acres<br>– Chemehuevi ACEC 43 acres<br>– Pisgah ACEC 86 acres<br>○ The estimated ground disturbance acreage includes disturbance associated with potential access to the locations if no current access exists.<br>○ The estimated ground disturbance acres for maintenance of Historic Route 66 in the before mentioned conservation units is not approval of these activities by BLM. Activities associated with the management and maintenance of Historic Route 66 on BLM administered land will follow all applicable laws, regulations and policies.<br>**Exceptions to the disturbance calculation:**<br>■ Actions necessary to control the immediate impacts of an emergency that are urgently needed to reduce the risk to life, property, or important natural, cultural, or historic resources, in accordance with 43 CFR 46.150, will not be required to conduct a disturbance calculation. If the actions are ground disturbing, that disturbance will count towards the disturbance cap when next calculated for non-emergency activities.<br>■ Actions that are authorized under a Department of Interior (DOI) or BLM NEPA Categorical Exclusion will not be required to conduct a disturbance calculation; however, these actions are not exempt from the disturbance mitigation requirement if a unit is at or above its cap. Although the BLM is not required to calculate the disturbance cap before approving an activity under a Categorical Exclusion, if the BLM knows an area is at or exceeding the cap, the disturbance mitigation requirements would apply to that activity.<br>■ BLM authorized/approved research or restoration activities that are designed or intended to promote and enhance the relevant and important values for which the ACEC was designated.<br>■ Actions that are entirely within the footprint of an existing authorized/approved site of ground disturbance that is within the calculation above.<br>■ Livestock grazing permit renewals (however, water developments or other range improvements requiring an Environmental Assessment or Environmental Impact Statement would be subject to the disturbance calculation and any mitigation requirements).<br>**Ground disturbance mitigation:** The purpose of ground disturbance mitigation (disturbance mitigation) is to allow actions to occur in California Desert National Conservation Lands and/or ACEC that is at or above its designated disturbance cap(s), | | | |

| ACECs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | while at the same time providing a restoration mechanism that will, over time, improve the condition of the unit(s) and take them below their cap. Disturbance mitigation is compensatory. Disturbance mitigation is unique to ground disturbance cap implementation and a discrete form of compensatory mitigation, separate from other required mitigation in the DRECP (see Glossary of Terms).<br><br>Disturbance mitigation may only be used for ground disturbance that is otherwise allowed by the LUPA and consistent with the purposes for which the California Desert National Conservation Lands and/or ACEC was designated. Areas used for disturbance mitigation are still considered disturbed until which time they meet the "Ground Disturbance Recovery" criteria in the description below.<br><br>**Unit for implementing disturbance mitigation:** The appropriate unit level for implementing disturbance mitigation is the same as that used for calculating ground disturbance. For ground disturbing activities that occur within an ACEC, the disturbance mitigation will be required within the ACEC unit boundary, or the boundary of the disturbance cap area(s), whichever area is smaller. If there is overlap between California Desert National Conservation Lands and an ACEC, the disturbance mitigation will take place in the smallest unit. If an activity/project overlaps two or more smaller units, disturbance mitigation will be required for all units that are at or over their specified disturbance cap.<br><br>**No disturbance mitigation required:** If the calculated ground disturbance for the unit(s) is under the cap:<br>■ No disturbance mitigation required; use activity design features to minimize new ground disturbance and help stay below cap.<br><br>**Disturbance mitigation required:** If the calculated ground disturbance is at or above the unit(s) cap, disturbance mitigation is required:<br>■ Use activity design features to minimize new ground disturbance to the extent practicable.<br>■ For the portion of the proposed activity that is located on land within an area previously disturbed by an authorized/approved action that has been terminated the required disturbance mitigation ratio is 1.5 (1½):1.<br>■ For the portion of the proposed activity that is located on undisturbed land or land disturbed by unauthorized activities, the required disturbance mitigation ratio is 3:1.<br>■ Although the BLM is not required to calculate the ground disturbance cap before approving/authorizing an activity under a Categorical Exclusion, if the BLM knows an area is at or exceeding the cap, the disturbance mitigation requirements would apply to that activity.<br>■ In the rare circumstance where the BLM authorizes activities on areas restored (e.g., as disturbance or other forms of mitigation), the required disturbance mitigation ratio requirement is doubled, that is, 3:1 or 6:1, respectively. | | | |

| Category | CMA # | CMA Text | Applica-bility | Explanation: Why CMA is not applicable | Comments |
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| | | ■ If disturbance mitigation opportunities do not exist in a unit, ground-disturbing activities (see exceptions below) will not be allowed in that unit until which time opportunities for disturbance mitigation in the unit become available (see types and forms of disturbance mitigation below) or the unit recovers and drops below the cap.<br>**Exceptions to the disturbance mitigation requirement:**<br>■ Any portion of the proposed activity that is located on land previously disturbed by an existing, valid authorized/approved action.<br>■ Livestock grazing permit renewals (however, water developments or other range improvements requiring an Environmental Assessment or Environmental would be subject to the disturbance calculation and any mitigation requirements).<br>■ Land use authorization assignments and renewals with no change in use.<br>■ BLM authorized/approved activities that are designed and implemented to reduce existing ground disturbance, such as ecological, cultural, or habitat restoration or enhancement activities.<br>■ Non-discretionary actions, where BLM has no authority to require compensatory mitigation.<br>**Types and forms of disturbance mitigation:**<br>■ Restoration of previously disturbed BLM lands within the boundary of the specific ACEC unit(s) being impacted.<br>■ Acquisition of undisturbed lands within the boundary of the specific ACEC unit being impacted.<br>■ Ground disturbance mitigation can be "nested" (i.e., combined) with other resource mitigation requirements, when appropriate. For example, a parcel restored for desert tortoise habitat mitigation may also satisfy the disturbance mitigation requirement if the parcel is within the appropriate unit of California Desert National Conservation Lands, ACEC boundary, or smaller disturbance cap unit.<br>**Ground Disturbance Recovery**<br>In general, California Desert National Conservation Lands and/or ACEC ground disturbance recovery would be determined during the decadal ground disturbance threshold ecoregion trend monitoring assessments (see below, and Monitoring and Adaptive Management). California Desert National Conservation Lands and/or ACEC recovery may be assessed at intermediate intervals, in between the decadal assessments, at BLM's discretion based on adequate funding and staffing. Between the decadal assessments, BLM will assume disturbed areas and units (same as used for calculations and mitigation) are not yet recovered until data is presented and BLM determines the area meets one of the two criteria below:<br>■ Field verification that disturbed area(s) are dominated by the establishment of native shrubs, as appropriate for the site, and demonstrated function of ecological processes (e.g., water flow, soil stability). | | | |

| ACECs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ■ Ground disturbance can no longer be seen at the 1:10,000 scale using the best available aerial imagery.<br>Areas within California Desert National Conservation Lands and/or ACEC(s) may be determined recovered by BLM at any time, once one of the two criteria above are met, prior to the entire unit (of calculation and mitigation) being determined recovered. Areas determined recovered by BLM would be removed from the subsequent ground disturbance calculation for that unit. | | | |
| **Lands & Realty** | **ACEC-LANDS-1** | Renewable energy activities are not allowed. ACECs are right-of-way avoidance areas for all other land use authorizations, except when identified as right-of-way exclusion areas in the individual unit's Special Management Plan (Appendix B). Transmission is allowed. Re-powering of an existing wind facility is allowed if the re-power project remains within the existing approved wind energy ROW and reduces environmental impacts. | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |
| | **ACEC-LANDS-2** | All lands within Areas of Critical Environmental Concern are identified for retention. If the BLM determines that disposal through exchange would result in a net benefit to the values of the ACEC, it may consider that exchange through a land use plan amendment. | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |
| **Minerals** | **ACEC-MIN-1** | **High Potential Mineral Areas**<br>■ In California Desert National Conservation Lands and ACECs, determine if reasonable alternatives exist outside of the California Desert National Conservation Lands/ACEC areas prior to proposing mineral resource development within one of these areas. | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |
| | **ACEC-VRM-1** | Manage Manzanar ACEC to conform to VRM Class II standards. | No | Project is not located in or near the area specified in the CMA. | The Easley Project will not impact the Chuckwalla ACEC. |

| Wildlife Allocation | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Lands & Realty** | **WILD-LANDS-1** | Renewable energy activities and related ancillary facilities are not allowed. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in a Wildlife Allocation; therefore, none of these CMAs apply. |
| | **WILD-LANDS-2** | Applications for use authorizations that provide a benefit to the management area or serve public interests may be allowed, unless prohibited by statute. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in a Wildlife Allocation; therefore, none of these CMAs apply. |
| | **WILD-LANDS-3** | Use authorization applications, excluding renewable energy projects and related ancillary facilities, will be evaluated in accordance with whether they are compatible with and not contrary to the wildlife values or the protection and enhancement of wildlife and plant habitat for that Allocation. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in a Wildlife Allocation; therefore, none of these CMAs apply. |
| | **WILD-LANDS-4** | All lands within Wildlife Allocations are identified for retention. If the BLM determines that disposal through exchange would result in a net benefit to the values of the Wildlife Allocation, it may consider that exchange through a land use plan amendment. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in a Wildlife Allocation; therefore, none of these CMAs apply. |

| SRMAs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Biological Resources-Vegetation** | **SRMA-VEG-1** | Vegetative Use Authorizations: Commercial collection of seed is an allowable use in designated OHV Open Areas. CMAs within SRMAs apply to this kind of activity | No | Project not located on federal lands with this designation. | The Project does not include commercial collection of seed. |
| **Comprehensive Trails and Travel Management** | **SRMA-CTTM-1** | Refer to the individual SRMA Special Unit Management Plans (Appendix C) for SRMA/Recreation Management Zone specific objectives, management actions, and allowable uses. Protect SRMAs for their unique/special recreation values. Manage roads/primitive roads/trails consistent with SRMA objectives and as designated in Transportation and Travel Management Plan/RMPs. | No | Project is not located in or near the area specified in the CMA. | The Chuckwalla SRMA, which contains the Chuckwalla Mountains Wilderness Area, is located south of I-10 by the Red Bluff Substation. The Easley gen-tie line would interconnect to the Oberon Project Substation, thus, would not be located within a SRMA. |
| **Lands and Realty** | **SRMA-LANDS-1** | Renewable energy development is not an allowable use in SRMAs due to the incompatibility with the values of the SRMA. Two exceptions to this management action are: | No | Project is not located in or near the area specified in the CMA. | The Project would not develop renewable energy in a SRMA. The Chuckwalla SRMA, which contains the Chuckwalla Mountains Wilderness Area, is located south of I-10 by the Red Bluff Substation. The Easley gen-tie line would interconnect to the Oberon Project Substation, thus, would not be located within a SRMA. |
| | | ▪ Geothermal development is an allowable use if a geothermal-only DFA overlays the SRMA designation and complies with a "no surface occupancy" restriction; with exception of the Ocotillo Wells SRMA (refer to the technology specifics for the DFA and the Special Unit Management Plan in Appendix C) | No | Project not located on federal lands with this designation. | |
| | | ▪ If DRECP variance land designation overlays the SRMA, renewable energy may be allowed on a case-by-case basis if the proposed project is found to be compatible with recreation values and the Special Unit Management Plan (Appendix C) specific to the SRMA. | No | Project not located on federal lands with this designation. | |
| | | Re-powering of an existing wind facility is allowed if the re-power project remains within the existing approved ROW and reduces environmental and recreation impacts. | No | Project not located on federal lands with this designation. | |
| | **SRMA-LANDS-2** | Acquired land within the SRMAs will be managed according to the goals and objectives of the SRMA, and activities on these lands will be consistent with the CMAs for SRMAs. | No | Land use does not occur on project site. | The Project does not include acquired lands except as compensation. Such lands would be managed per the agreement with the BLM and the resources protected. |

| SRMAs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **SRMA-LANDS-3** | Lands within SRMAs are available for disposal. However, disposal actions are only available to parties that will manage the land in accordance with the recreational values identified in the Special Unit Management Plan (Appendix C) for the SRMA. | No | Project is not associated with a land exchange. | The Project does not include disposal of lands. |
| **Recreation & Visitor Services** | **SRMA-REC-1** | Manage SRMAs for their targeted recreation activities, experiences and benefits. Maintain (and where possible enhance) the recreation setting characteristics—physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls. | No | Project is not located in or near the area specified in the CMA. | The Chuckwalla SRMA, which contains the Chuckwalla Mountains Wilderness Area, is located south of I-10 by the Red Bluff Substation. The Easley gen-tie line would interconnect to the Oberon Project Substation, thus, would not be located within a SRMA. |
| | **SRMA-REC-2** | In SRMAs that overlap with California Desert National Conservation Lands and ACECs, manage in accordance with the Special Unit Management Plans for the SRMA/ERMA and the applicable ecological and cultural conservation unit (Appendices A, B, and C). If there is a conflict between the California Desert National Conservation Lands or ACEC management and the SRMA/ERMA management, the BLM will apply the most protective management (i.e., management that best supports natural and cultural resource conservation and limits impacts to the values for which the conservation unit was designated). | No | Project not located on federal lands with this designation. | This CMA is direction to the BLM regarding management of SRMAs. |
| | **SRMA-REC-3** | SRMA objectives and desired recreation setting characteristics described in the Special Unit Management Plans (Appendix C) may be refined and/or zoned in activity-level planning, based on visitor-use surveys and other monitoring. | No | Project not located on federal lands with this designation. | This CMA is direction to the BLM regarding management of SRMAs. |
| **Visual Resources Management** | **SRMA-VRM-1** | Manage the Alabama Hills SRMA to conform to VRM Class II standards. | No | Project is not located in or near the area specified in the CMA. | The Project is not located within the Alabama Hills SRMA. |

| ERMAs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **General** | **ERMA-LUPA-1** | Renewable energy activities and related ancillary facilities are not allowed where an ERMA overlaps with California Desert National Conservation Lands, ACEC, or Wildlife Allocation, or is not allowed in a specific ERMA as described in the Special Unit Management Plan (see Appendix C). | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in an Extensive Recreation Management Area; none of these CMAs apply. |
| | **ERMA-LUPA-2** | In areas where renewable energy activities and related ancillary facilities are an allowable use, the CMAs related to renewable energy activities and related ancillary facilities for General Public Lands apply (refer to Section II.4.2.10), including but not limited to: | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in an Extensive Recreation Management Area; none of these CMAs apply. |
| | | ▪ Renewable energy activities and related ancillary facilities that may have a measurable (i.e., the effect can be evaluated) adverse impact (direct, indirect or cumulative)on the biological or cultural conservation strategies, including individual California Desert National Conservation Lands, ACEC and/or Wildlife Allocation units of the DRECP LUPA are not allowed. | No | Project not located on federal lands with this designation. | |
| | | ▪ Renewable energy activities and related ancillary facilities that may have a measureable (i.e., the effect can be evaluated) adverse impact (direct, indirect or cumulative) on the recreation design, including individual SRMAs and ERMAs, of the DRECP LUPA are not allowed. | No | Project not located on federal lands with this designation. | |
| | | ▪ Renewable energy activities and related ancillary facilities that may have a measurable (i.e., the effect can be evaluated) adverse impact (direct, indirect, or cumulative) on the renewable energy and transmission design, including individual DFAs and VPLs, are not allowed. | No | Project not located on federal lands with this designation. | |
| **Recreation and Visitor Services** | **ERMA-REC-1** | When considering land use authorizations within ERMAs, retain to the extent practicable recreation activities and associated qualities and conditions within these areas. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located in an Extensive Recreation Management Area; none of these CMAs apply. |

| DFAs and VPLs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Biological Resources: North American Warm Desert Dune and Sand Flats** | **DFA-VPL-BIO-DUNE-1** | Activities in DFAs and VPLs, including transmission substations, will be sited to avoid dune vegetation (i.e., North American Warm Desert Dune and Sand Flats). Unavoidable impacts (see "unavoidable impacts to resources" in the Glossary of Terms) to dune vegetation will be limited to transmission projects, except transmission substations, and access roads that will be sited to minimize unavoidable impacts.<br>■ For unavoidable impacts (see "unavoidable impacts to resources" in the Glossary of Terms) to dune vegetation, the following will be required:<br>○ Access roads will be unpaved.<br>○ Access roads will be designed and constructed to be at grade with the ground surface to avoid inhibiting sand transportation. | Yes | | The Easley Project does not include dune vegetation. The Project will comply with this CMA. |
| | **DFA-VPL-BIO-DUNE-2** | Within Aeolian corridors that transport sand to dune formations and vegetation types downwind inside and outside of the DFAs, all activities will be designed and operated to facilitate the flow of sand across activity sites, and avoid the trapping or diverting of sand from the Aeolian corridor. Buildings and structures within the site will take into account the direction of sand flow and, to the extent feasible, build and align structures to allow sand to flow through the site unimpeded. Fences will be designed to allow sand to flow through and not be trapped. | No | Project is not located in or near the area specified in the CMA. | The Easley Project does not include dune sand transport corridors. |
| **Individual Focus Species (IFS): Desert Tortoise** | **DFA-VPL-BIO-IFS-1** | To the maximum extent practicable (see Glossary of Terms), activities will be sited in previously disturbed areas, areas of low-quality habitat, and areas with low habitat intactness in desert tortoise linkages and the Ord-Rodman TCA, identified in Appendix D. | Yes | | The Easley Project is in a fragmented landscape north of the I-10 freeway and Oberon Project, south of the Desert Sunlight and Desert Harvest projects, near to rural residential communities, and abandoned and active agricultural land uses. Desert tortoise habitat rankings range from 0 to 0.7 according to the Nussear model which does not consider these anthropogenic habitat effects. The site partially overlaps a multiple species linkage and Pinto Wash Desert Tortoise Linkage. The Project will comply with this CMA. |
| **Mohave Ground Squirrel** | **DFA-VPL-BIO-IFS-2** | Within the Mohave ground squirrel range configure solar panel and wind turbine arrays to allow areas of native vegetation that will facilitate Mohave ground squirrel movement through the project site. This may include raised and/or rotating solar panels or open space between rows of panels or turbines. Fences surrounding sites should be permeable for Mohave ground squirrels. | No | Project not within the range or habitat of this species. | The Easley Project is outside of the range of the Mohave ground squirrel. |

| DFAs and VPLs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Bats** | **DFA-VPL-BIO-BAT-1** | Wind projects will not be sited within 0.5 mile of any occupied or presumed occupied maternity roost. | No | Land use does not occur on project site. | The Project is not a wind project. |
| **Fire Prevention/ Protection** | **DFA-VPL-BIO-FIRE-1** | Implement the following standard practice for fire prevention/protection:<br>■ Implement site-specific fire prevention/protection actions particular to the construction and operation of renewable energy and transmission project that include procedures for reducing fires while minimizing the necessary amount of vegetation clearing, fuel modification, and other construction-related activities. At a minimum these actions will include designating site fire coordinators, providing adequate fire suppression equipment (including in vehicles), and establishing emergency response information relevant to the construction site. | Yes | | With implementation of mitigation measures to be developed during the NEPA process and the Fire Management and Prevention Plan (POD Appendix V), the Project will comply with this CMA. |
| **Biological Compensation** | **DFA-VPL-BIO-COMP-1** | Impacts to biological resources from all activities in DFAs and VPLs will be compensated using the same ratios and strategies as LUPA-BIO-COMP-1 through 4, with the exception identified below in DFA-VPL-BIO-COMP-2. | Yes | | The Project will comply with the standard ratio for new impacts to native habitat, pinto wash desert tortoise linkage, and will comply with the designated critical habitat ratio where applicable. The Project will comply with this CMA. |
| | **DFA-VPL-BIO-COMP-2** | Exception to the biological resources standard compensation ratio of 1:1 - desert tortoise intact linkage habitat compensation ratio of 2:1 applies to the identified modeled intact linkage habitat (Appendix D) in two linkages—Ord-Rodman critical habitat unit to Joshua Tree National Park, and Fremont-Kramer critical habitat unit to the Ord-Rodman critical habitat unit, as identified in Appendix D. Maintenance and enhancement of the function of these two linkages is essential to the function of the Ord-Rodman critical habitat unit. | No | Project is not located in or near the area specified in the CMA. | The Project is not within the desert tortoise linkages noted in the CMA. |
| **Comprehensive Trails and Travel Management** | **DFA-VPL-CTTM-1** | Avoid Tier 1, Tier 2, Tier 3 roads/primitive roads/trails, Backcountry Byways, and other significant linear features (as defined in the LUPA-wide CMAs). If avoidance is not practicable, relocate access to the same or higher standard and maintain the recreation setting characteristics and access to recreation activities, facilities, and destination. | No | Land use does not occur on project site. | The Easley Project would not impact access to recreational areas. Existing open routes that cross through the Project to other resources would remain open and accessible. Some routes that do not lead to recreational areas may be closed – an implementation decision for the BLM. |
| | **DFA-VPL-CTTM-2** | If residual impacts to Tier 1 and Tier 2 roads/primitive roads/trails, Backcountry Byways, or other significant linear features cannot be protected and maintained, commensurate compensation in the form of an enhanced recreation operations, recreation facilities or opportunities will be required. | No | Resource not found on the project site | No residual effects to Tier 1 and Tier 2 roads would occur. |

| DFAs and VPLs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Cultural Resources and Tribal Interests** | | BLM developed and maintains a geodatabase for Cultural Resources and Cultural Resources investigations in a GIS. The geodatabase is regularly updated with newly recorded and re-recorded resource and investigation data. However, while the geodatabase includes location information (feature classes or shapefiles), the associated information about each resource or investigation (attribute data) is limited or inconsistent. As it exists now, the geodatabase cannot be used for predictive analyses like those recommended in *A Strategy for Improving Mitigation Policies and Practices of the Department of the Interior* (DOI 2014). However, with some updates, the geodatabase will be a powerful tool for identifying potential conservation priorities as well as development opportunities. Many of the CMAs below are intended to facilitate the update of BLM's geodatabase, and require its use when the updates are complete.<br>The following CMAs are for renewable energy and transmission land use authorizations only, in DFAs and VPLs. All other activities in DFAs and VPs are subject to the NHPA Section 106 process. | | | |
| | **DFA-VPL-CUL-1** | For renewable energy activities and transmission, require the applicant to pay all appropriate costs associated with the following processes, through the appropriate BLM funding mechanism:<br>■ All appropriate costs associated with the BLM's analysis of the DRECP geodatabase and other sources for cultural resources sensitivity.<br>■ All appropriate costs associated with preliminary sensitivity analysis.<br>■ All appropriate costs associated with the Section 106 process including the identification and defining of cultural resources. These costs may also include logistical, travel, and other support costs incurred by tribes in the consultation process.<br>■ All appropriate costs associated with updating the DRECP cultural resources geodatabase with project specific results. | Yes | | The existing cost-recovery agreements meet this CMA. |
| | **DFA-VPL-CUL-2** | Consistent and in compliance with the NHPA Programmatic Agreement, signed February 5, 2016, or the most up to date signed version -for renewable energy activities and transmission, a compensatory mitigation fee will be required within the LUPA Decision Area to address cumulative and some indirect adverse effects to historic properties. The mitigation fee will be calculated in a manner that is commensurate to the size and regional impacts of the project. Refer to the Programmatic Agreement for details regarding the mitigation fee. | Yes | | This may be accomplished through mitigation measures developed through the Section 106 or NEPA process. The Project will comply with this CMA. |
| | **DFA-VPL-CUL-3** | For renewable energy activities and transmission, the management fee rate will be determined through the NHPA programmatic Section 106 consultation process that will be completed as part of the DRECP land use plan amendment. | Yes | | This may be accomplished through mitigation measures developed through the Section 106 or NEPA process. The Project will comply with this CMA. |

| DFAs and VPLs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **DFA-VPL-CUL-4** | For renewable energy activities and transmission, demonstrate that results of cultural resources sensitivity, based on the DRECP geodatabase, and other sources, are used as part of the initial planning pre-application process and to select of specific footprints for further consideration. | Yes | | The CMA is an action to be taken by the BLM. |
| | **DFA-VPL-CUL-5** | For renewable energy activities and transmission, provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints. | Yes | | A BLM Class III archaeological survey will be completed for the Easley Project prior to the NEPA review, which exceeds the requirements of this CMA. The Project will comply with this CMA. |
| | **DFA-VPL-CUL-6** | For renewable energy activities and transmission, provide justification in the application why the project considerations merit moving forward if the specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM. | Yes | | Mitigation measures developed during the NEPA process will require reducing impacts of the Easley Project to cultural resources to the extent feasible. The Project will comply with this CMA. |
| | **DFA-VPL-CUL-7** | For renewable energy activities and transmission, complete the NHPA Section 106 Process as specified in 36 CFR Part 800, or via an alternate procedure, allowed for under 36 CFR Part 800.14 prior to issuing a ROD or ROW grant on any utility-scale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement. | Yes | | NHPA Section 106 will be completed for the Project consistent with the DRECP PA Section 106 compliance will be completed prior to the issuance of a Decision Record for the Project. Mitigation measures developed during the NEPA process will require reducing impacts of the Easley Project to cultural resources to the extent feasible. The Project will comply with this CMA. |
| **Livestock Grazing** | **DFA-VPL-LIVE-1** | Avoid siting solar developments in active livestock grazing allotments. If a ROW is granted for solar development in an active livestock grazing allotment, prior to solar projects being constructed in active livestock allotments, an agreement must be reached with the grazing permittee/lessee on the 2-year notification requirements. If any rangeland improvements such as, but not limited to, fences, corrals, or water storage projects, are to be impacted by energy projects, reach agreement with the BLM and the grazing permittee/lessee on moving or replacing the range improvement. This may include the costs for NEPA, clearances, and materials. | No | Land use does not occur on project site. | There are no active livestock grazing allotments on the Easley site. |
| | **DFA-VPL-LIVE-2** | In California Condor use areas, wind energy ROWs will include a term and condition requiring the permittee and wind operator to eliminate grazing of livestock. | No | Project is not located in or near the area specified in the CMA. | The Project is not within condor use areas. |

| DFAs and VPLs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **DFA-VPL-LIVE-3** | Include no surface occupancy stipulation on geothermal leases in active grazing allotments. | No | Project is not located in or near the area specified in the CMA. | The Project is not located on geothermal leases. |
| **Vegetation** | **DFA-VPL-VEG-1** | Vegetative Use Authorizations: Commercial collection of seed in DFAs and VPLs is an allowable use. CMA's within these areas apply to this kind of activity. | No | Land use does not occur on project site. | The Project does not entail commercial collection of seed; however, all revegetation will be performed per a Vegeta-tion Resources Management Plan that requires seed collec-tion from the Project site, or if unavailable, acquired from other native seed suppliers." |
| **Visual Resources Management** | **DFA-VPL-VRM-1** | Encourage development in a planned fashion within DFAs (e.g., similar to the planned unit development concept used for urban design—i.e., in-fill vs. scattered development, use of common road networks, Generator Tie Lines etc., use of similar support facility designs materials and colors etc.) to avoid industrial sprawl. | Yes | | The Easley Project is located in close proximity to other renewable development and an existing electric substation. The Easley Project will share access roads and utilize exist-ing roads to the extent feasi-ble. In addition, the Easley Project will interconnect to the Oberon Substation and utilize the Oberon gen-tie line to the Red Bluff Substation. The Project will comply with this CMA. |
| | **DFA-VPL-VRM-2** | Development in DFAs and VPLs are required to incorporate visual design standards and include the best available, most recent BMPs, as determined by BLM (e.g. Solar, Wind, West Wide Energy Corridor, and Geothermal PEISs, the "*Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands*", and other programmatic BMP documents). | Yes | | The Project will implement BMPs, as necessary, to comply with this CMA. |
| | **DFA-VPL-VRM-3** | **Required Visual Resource BMPs.** All development within the DFAs and VPLs will abide by the BMPs addressed in the most recent version of the document "*Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands",* or its replacement, including, but not limited to the following:<br>▪ Transmission:<br>○ Color-treat monopoles Shadow Gray per the BLM Environmental Color Chart CC001 unless a more effective color choice is selected by the local Field Office VRM specialist.<br>○ Lattice towers and conductors will have non-specular qualities. | Yes | | The Project will implement BMPs, as necessary, to comply with this CMA. |

| DFAs and VPLs | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ○ Lattice Towers will be located a minimum of 3/4 miles away from Key Observation Points such as roads, scenic overlooks, trails, campgrounds, navigable rivers and other areas people tend to congregate and located against a landscape backdrop when topography allows.<br>■ Solar – Color treat all facilities Shadow Gray from the BLM Environmental Color Chart CC001 unless a more effective color is selected by the Field Office VRM specialist, including but not limited to:<br>○ Concentrated solar thermal parabolic trough panel backs<br>○ Solar power tower heliostats<br>○ Solar power towers<br>○ Cooling towers<br>○ Power blocks<br>■ Wind – Color treat all facilities Shadow Gray with the exception of the wind turbine and towers 200 vertical feet or more.<br>■ Night Sky – BMPs to minimize impacts to night sky including light shielding will be employed | | | |

| Development Focus Areas | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Renewable Energy** | **DFA-RE-1** | In order to use the DRECP's BLM LUPA streamlined process for renewable energy in DFAs and transmission, project proponents must first consult with appropriate representatives of the Department of Defense to ensure the proposed renewable energy and/or transmission activity will not cause an unacceptable risk to national security. Refer to additional detail in LUPA Section IV.4 and Appendix E. Specifically, the following process will be implemented:<br>■ For renewable energy and transmission activities proposed in red areas (see Appendix E), the DRECP BLM LUPA streamlined process will not be available unless a letter is obtained from the Department of Defense Siting Clearinghouse stating that military impacts have been mitigated.<br>■ For renewable energy and transmission activities proposed in orange or yellow areas (see Appendix E), the DRECP BLM LUPA streamlined process will not be available until Department of Defense representatives at the regional level have been consulted and have been provided a minimum of 30 days to assess potential mission impacts. If the regional representatives conclude within the 30-day period that there is a significant possibility that a proposed activity presents an unacceptable risk to national security, the BLM will not streamline the proposed activity process and will require additional environmental analysis regarding Department of Defense impacts, unless a letter is obtained from the Department of Defense Siting Clearinghouse stating that military impacts have been mitigated. | Yes | | The DRECP LUPA Appendix E states that solar PV present little to no conflict to military operations. The Project will comply with this CMA. |
| **Biological Resources** | **DFA-BIO-IFS-1** | Conduct the following surveys as applicable in the DFAs as shown in **Table 21**. | Yes | | Wildlife surveys have been completed as dictated in DFA-BIO-IFS-1 for the applicable species. The methodologies and surveys results are included in the Biological Resources Technical Report. The Project will comply with this CMA. |
| | **DFA-BIO-IFS-2** | Implement the following setbacks shown below in **Table 22** as applicable in the DFAs. | Yes | | The Project will comply, as applicable, with the setbacks listed in this CMA (see also mitigation measures developed during the NEPA process). |
| **Desert Tortoise** | **DFA-BIO-IFS-3** | Protocol surveys, as described in **DFA-BIO-IFS-1** and shown in **Table 21**, are required for development in the desert tortoise survey areas (see Appendix D). Based on the results of the protocol surveys the identified desert tortoises will be translocated, or the activity will be redesigned/relocated as described below:<br>■ If protocol surveys identify 35 or fewer desert tortoises in potential impact areas on an activity site, the USFWS and CDFW (for third party activities) will be contacted and provided with the protocol survey results and information necessary for the translocation of identified desert tortoises. Pre-construction | Yes | | The Project will comply with this CMA and the protocol survey requirements. Wildlife surveys have been completed. The methodologies and surveys results are included in the Biological Resources Technical Report. |

| Development Focus Areas | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | and construction, and other activities will not begin until the clearance surveys for the site have been completed and the desert tortoises have been translocated. Translocation will be conducted in coordination with the USFWS and CDFW, as appropriate, per the protocols in the Desert Tortoise Field Manual (USFWS 2009) and the most up-to-date USFWS protocol.<br>■ If protocol surveys identify an adult desert tortoise density (i.e., individuals 160 millimeters or more) of more than 5 per square mile or more than 35 individuals total on a project site, the project will be required to be redesigned, re-sited, or relocated to avoid and minimize the impacts of the activity on desert tortoise. | | | No live desert tortoise or active desert tortoise sign were observed during the surveys. Implementation of mitigation measures developed during the NEPA process and the Desert Tortoise Protection and Relocation Plan (POD Appendix I) will minimize impacts to desert tortoise. |
| **Mohave Ground Squirrel** | **DFA-BIO-IFS-4** | The DFA in the "North of Edwards" Mohave ground squirrel key population center is closed to renewable energy applications and any activity that is likely to result in the mortality (killing) of a Mohave ground squirrel until Kern and San Bernardino counties complete county General Plan amendments/updates that include renewable energy development and Mohave ground squirrel conservation on nonfederal land in the West Mojave ecoregion and the CDFW releases a final Mohave Ground Squirrel Conservation Strategy, or for a period of 5 years after the signing of the DRECP LUPA ROD, whichever comes first. If Kern and San Bernardino counties and CDFW do not complete their respective plans within the 5-year period, prior to opening the DFA to renewable energy applications and other impacting activities, BLM will assess new Mohave ground squirrel information, in coordination with the CDFW, to determine if modifications to the DFA or CMAs are warranted based on new Mohave ground squirrel information. | No | Project not within the range or habitat of this species. | The Project is located outside of the Mohave ground squirrel range. |
| | **DFA-BIO-IFS-5** | Once the planning criteria in CMA **DFA-BIO-IFS-4**, are met, the DFA in the "North of Edwards" Mohave ground squirrel key population center will be reevaluated. If Kern and San Bernardino counties receive Mohave ground squirrel take authorizations from the CDFW through completed Natural Community Conservation Plans or county-wide conservation strategies that address Mohave ground squirrel conservation at a landscape level and include renewable energy development areas on nonfederal land in the West Mojave ecoregion, the "North of Edwards" key population center DFA will be eliminated and the management changed to General Public Lands, as part of adaptive management. | No | Project not within the range or habitat of this species. | The Project is located outside of the Mohave ground squirrel range. |
| **Plants** | **DFA-BIO-PLANT-1** | Impact to suitable habitat (see Glossary of Terms) for the following plant Focus Species within the DRECP Plan Area will be capped (see "DFA Suitable Habitat Impacts Cap" in the Glossary of Terms) in the DFAs as described below and in **Table 23**. The suitable habitat impact cap for these plant species is to be measured in DFAs as a group, not individually.<br>Triple-ribbed milk-vetch is an avoidance species in DFAs, therefore none of its suitable habitat is to be impacted. | No | Project not within the range or habitat of this species. | The Project is located outside of the geographic range of all species listed in the CMA. |

| Development Focus Areas | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Recreation** | **DFA-REC-1** | Retain, to the extent possible, the identified recreation setting characteristics: physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls (see recreation setting characteristics matrix). | Yes | | The Project is surrounded by recreational opportunities and by built environment, including existing and approved renew-able energy projects. The Pro-ject would be located in a DFA and the area does not experi-ence high levels of recreation. It would not maintain or enhance the setting but would be consistent with the existing setting and with the DFA designation. |
| | **DFA-REC-2** | Avoid large-scale ground disturbance within one-half mile of Level 3 Recreation facility footprint including route access and staging areas. If avoidance isn't practicable, the facility must be relocated to the same or higher standard and maintain recreation objectives and setting characteristics. | No | Project is not located in or near the area specified in the CMA. | The nearest Level 3 Recreation facility is the Corn Springs Road kiosk, which is beyond one-half mile from the Project. |
| | **DFA-REC-3** | SRMAs are exclusion areas for renewable energy development due to the incompatibility with the values of SRMAs. Two exceptions to this management action are:<br>1. geothermal development is an allowable use in the few instances in Imperial County where a geothermal-only DFA overlays the SRMA designation and the lease includes a "no surface occupancy" stipulation, with exception of three specific parcels in the Ocotillo Wells SRMA (the Special Unit Management Plan in Appendix C)<br>2. the VPL at Antimony Flat in Kern County overlaying the SRMA, renewable energy may be allowed on a case-by-case basis if the proposed project is found to be compatible with the specific SRMA values. | No | Project is not located in or near the area specified in the CMA. | The Project would not develop renewable energy in a SRMA. |
| | **DFA-REC-4** | When considering large-scale development in DFAs, retain to the extent possible existing, approved recreation activities. | Yes | | The Project is in a DFA, but would not impact approved, recreation activities. |
| | **DFA-REC-5** | For displacement of dispersed recreation opportunities, commensurate compensation in the form of enhanced recreation operations, recreation facilities or opportunities will be required. If recreation displacement results in resource damage due to increased use in other areas, mitigate that damage through whatever measures are most appropriate as determined by the Authorized Officer. | Yes | | The Project would not displace recreation opportunities as the Project area is infrequently used for recreation. |
| | **DFA-REC-6** | Where activities in DFAs displace authorized facilities, similar new recreation facilities/campgrounds (including but not limited to the installation of new structures including pit toilets, shade structures, picnic tables, installing interpretive panels, etc.), will be provided. | No | Land use does not occur on project site. | The Project would not displace authorized facilities. |

| Development Focus Areas | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **DFA-REC-7** | If designated vehicle routes are directly impacted by activities (includes modification of existing route to accommodate industrial equipment, restricted access or full closure of designated route, pull outs, and staging area's to the public, etc.), mitigation will include the development of alternative routes to allow for continued vehicular access with proper signage, with a similar recreation experience. In addition, mitigation will also include the construction of an "OHV touring route" which circumvents the activity area and allows for interpretive signing materials to be placed at strategic locations along the new touring route, if determined to be appropriate by BLM. | Yes | | The Project would close some existing open routes. These routes do not lead to a specific recreational area so alternative routes would not be feasible. However, the Applicant could contribute funds if necessary to enhancing an existing OHV touring route, such as within the Chuckwalla SRMA which would allow for a similar recreation experience. The Project will comply with this CMA. |
| | **DFA-REC-8** | Impacts from activities in a DFA to Special Recreation Permit activities will be mitigated by providing necessary planning and NEPA compliance documentation for Special Recreation Permit replacement activities, as determined appropriate on a case-by case basis. | No | Land use does not occur on project site. | The Project would not impact Special Recreation Permit activities. |
| | **DFA-REC-9** | If residual impacts to SRMAs occur from activity impacts in a DFA, commensurate mitigation through relocation or replacement of facilities or compensation (in the form of a recreation operations and enhancement fund) will be required. | No | Project is not located in or near the area specified in the CMA. | The Project in the DFA would not have residual impacts to the SRMA. |
| | **DFA-REC-10** | Within ERMAs, impacts from development projects that do not enhance conservation or recreation goals will require commensurate mitigation through relocation or replacement of facilities. | No | Project is not located in or near the area specified in the CMA. | The Project would not occur within an ERMA. |
| **Lands and Realty** | **DFA-LANDS-1** | Lands within DFAs are available for disposal. | No | Project is not associated with a land exchange. | The Project is not proposing lands for disposal |
| | **DFA-LANDS-2** | Development of acquired lands within DFAs is allowed, at the discretion of the BLM California State Director, unless development is incompatible with the purposes of the acquisition and any applicable deed restrictions. | No | Land use does not occur on project site. | The Project would not occur on acquired lands. |
| | **DFA-LANDS-3** | Lands proposed for exchange in DFAs will be segregated from the public land laws for 5 years, but wind, solar, geothermal and transmission applications and their associated facilities are allowed. | No | Project is not associated with a land exchange. | The Project would not propose land exchanges. |
| | **DFA-LANDS-4** | Review withdrawn lands in DFAs upon receipt of a ROW application and if appropriate modify to allow for issuance of ROW grants. | No | Project is not associated with a land exchange. | The Project would not occur on withdrawn lands and would be designed to be compatible with any ROW that cross the site. |

| Development Focus Areas | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **DFA-LANDS-5** | Cost recovery funding used to process a ROW application may be used to adjudicate and remedy any conflicting land withdrawals, if necessary. | No | Project is not associated with a land exchange. | No conflicting land withdrawals are necessary. |
| | **DFA-LANDS-6** | Make public lands in DFAs available for selection by the CSLC in lieu of base lands within DFAs. Base lands are School Lands the State of California was entitled to but did not receive title to due to prior existing encumbrances. | No | Project is not associated with a land exchange. | The Project would not involve any CSLC land exchanges. |
| | **DFA-LANDS-7** | Transmission facilities are an allowable use and will not require a plan amendment within DFAs. | Yes | | The gen-tie line would be located within a DFA and does not require a plan amendment |
| **Visual Resources Management** | **DFA-VRM-1** | Manage all DFAs as VRM Class IV to allow for industrial scale development. Employ best management practices to reduce visual contrast of facilities. | Yes | | The Project will implement BMPs, as necessary, to comply with this CMA. |
| | **DFA-VRM-2** | Regional mitigation for visual impacts is required in DFAs . Mitigation is be based on the VRI class and the underlying visual values (scenic quality, sensitivity, and distance zone) for the activity area as it stands at the time the ROD is signed for the DRECP LUPA. Compensatory mitigation may take the form of reclamation of other BLM lands to maintain (neutral) or enhance (beneficial) visual values on VRI Class II and III lands. Other considerations may include acquisition of conservation easements to protect and sustain visual quality within the viewshed of BLM lands. The following mitigation ratios will be applied in DFAs:<br>■ VRI Class II 1:1 ratio<br>■ VRI Class III ½ (0.5) : 1 ratio<br>■ VRI Class IV, no mitigation required<br>Additional mitigation will be required where activities affect viewsheds of specially designated areas (e.g., National Scenic and Historic Trails). | Yes | | The Project is located on land with VRI Class IV, so no mitigation is required. The Project will comply with this CMA. |
| **Wild Horses and Burros** | **DFA-WHB-1** | Incorporate all guidance provided by the Wild Free-Roaming Horses and Burros Act of 1971, its amendments, associated regulations, and any pertinent court rulings into the project/activity proposal, as appropriate. | No | Resource not found on the project site | There are no wild horses or burros on the Project. |
| | **DFA-WHB-2** | Development that would reduce burros' access to forage, water, shelter, or space or impede their wild, free-roaming behavior in Herd Management Area is not allowed | No | Resource not found on the project site | There are no wild horses or burros on the Project. |
| | **DFA-WHB-3** | Mitigation can only occur on lands that the animals were found at the passage of the Wild Free-Roaming Horses and Burros Act of 1971. Expansion of the boundaries of a Herd Management Area back into the Herd Areas would require a land use plan amendment, the cost of which would be incurred by the applicant proposing to develop in the Herd Management Area, if part of the proposed mitigation package. | No | Resource not found on the project site | There are no wild horses or burros on the Project. |
| **Wilderness Characteristics** | **DFA-WC-1** | Renewable energy activities are allowed in DFAs that have been inventoried and identified as lands with wilderness characteristics. | No | Resource not found on the project site | There are no lands with wilderness characteristics on the Project. |

| Development Focus Areas | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **DFA-WC-2** | For inventoried lands found to have wilderness characteristics in DFAs, compensatory mitigation is required at a 1:1 ratio if wilderness characteristics are directly impacted. This may be accomplished through acquisition and donation, from willing landowners, to the federal government of (a) wilderness inholdings, (b) wilderness edge holdings that have inventoried wilderness characteristics, or (c) other areas within the LUPA Decision Area that are managed to protect wilderness characteristics. Restoration of impaired wilderness characteristics in Wilderness, Wilderness Study Area, and lands managed to protect wilderness characteristics could be substituted for acquisition. | No | Resource not found on the project site | There are no lands with wilderness characteristics on the Project. |

| Variance Process Lands | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **Renewable Energy** | **LUVPL-BIO-RE-1** | All renewable energy activities, during the planning phase, must establish baseline conditions for Focus and BLM Special Status bird and bat species using protocols and methodologies approved by BLM in coordination with USFWS, and CDFW as appropriate. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on Variance Process Lands; none of these CMAs apply. |
| | **VPL-BIO-RE-2** | As part of a renewable energy activity proposal that may affect bird and bat Focus and BLM Special Status Species, a proven (e.g., peer reviewed) technology solution to bird and bat Focus and BLM Special Status Species injury and mortality must be incorporated into the activity design and operation as a mandatory element. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on Variance Process Lands; none of these CMAs apply. |
| | **VPL-BIO-RE-3** | As part of a renewable energy activity proposal that may conflict with Department of Defense operations, a proven (e.g., peer reviewed) technology solution to Department of Defense conflicts must be incorporated as a mandatory element. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on Variance Process Lands; none of these CMAs apply. |
| | **VPL-BIO-RE-4** | Each utility-scale renewable energy activity must result in a no net increase in ground disturbance within the specific ROW grant area. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on Variance Process Lands; none of these CMAs apply. |
| | **VPL-BIO-RE-5** | The VPL at Antimony Flat in Kern County will remain as a VPL or be removed based on consistency with the Kern County General Plan Update. If removed, renewable energy activities would no longer be an allowable use in the SRMA. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on Variance Process Lands; none of these CMAs apply. |
| **Lands & Realty** | **VPL-LANDS-1** | Lands within VPLs are available for disposal. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on Variance Process Lands; none of these CMAs apply. |
| **Recreation & Visitor Services** | **VPL-REC-1** | The VPL at Antimony Flat in Kern County will remain as a VPL or be removed based on consistency with the Kern County General Plan Update. If removed, renewable energy activities would no longer be an allowable use in the SRMA. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on Variance Process Lands; none of these CMAs apply. |
| **Visual Resources Management** | **VPL-VRM-1** | Manage all Variance Process Lands as VRM Class III. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on Variance Process Lands; none of these CMAs apply. |

| Variance Process Lands | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **VPL-VRM-2** | Regional mitigation is required for visual impacts in VPLs. Mitigation will be based on the VRI class and the underlying visual values (scenic quality, sensitivity, and distance zone) for the development area as it stands at the time the ROD is signed for the DRECP. Compensatory mitigation may take the form of reclamation of other BLM lands to maintain (neutral) or enhance (beneficial) visual values on VRI Class II and III lands. Other considerations may include acquisition of conservation easements to protect and sustain visual quality within the viewshed of BLM lands. The following mitigation ratios will be applied in VPLs:<br>■ VRI Class II 2:1 ratio<br>■ VRI Class III 1:1 ratio<br>■ VRI Class IV no mitigation required<br>Additional mitigation will be required where activities affect viewsheds of specially designated areas (e.g., National Scenic and Historic Trails). | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on Variance Process Lands; none of these CMAs apply. |

| General Public Lands | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **GPL-1** | DRECP LUPA Biological and Cultural Conservation Design – Activities that may have a measurable (i.e. the effect can be evaluated) adverse impact (direct, indirect or cumulative) on the biological or cultural conservation strategies, including individual California Desert National Conservation Lands, ACEC and/or Wildlife Allocation units of the DRECP LUPA are not allowed. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-2** | DRECP LUPA Recreation Design - Activities that may have a measurable (i.e. the effect can be evaluated) adverse impact (direct, indirect or cumulative) on the recreation design, including individual SRMAs and ERMAs, of the DRECP LUPA are not allowed. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-3** | DRECP LUPA Renewable Energy and Transmission Design - Activities that may have a measurable (i.e. the effect can be evaluated) adverse impact (direct, indirect, or cumulative) on the renewable energy and transmission design, including individual DFAs and VPLs, are not allowed. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-4** | Renewable Energy Activities – A renewable energy activity that is not transmission aligned (see Glossary of Terms), as per the DRECP energy development design, is not allowed. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-5** | DRECP LUPA – Activities that may have a measurable (i.e. the effect can be evaluated) adverse impact (direct, indirect, or cumulative) on the LUPA-wide structure, and implementation of the DRECP LUPA are not allowed. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| **Comprehensive Trails and Travel Management** | **GPL-CTTM-1** | Avoid Tier 1, Tier 2, Tier 3 roads/primitive roads/trails, Backcountry Byways, and other significant linear features (as defined in the LUPA-wide CMAs). If avoidance is not practicable, relocate access to the same or higher standard and maintain the recreation setting characteristics and access to recreation activities, facilities, and destination. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-CTTM-2** | If residual impacts to Tier 1 and Tier 2 roads/primitive roads/trails, Backcountry Byways, or other significant linear features cannot be protected and maintained, commensurate compensation in the form of an enhanced recreation operations, recreation facilities or opportunities will be required.<br>The following CMAs are for renewable energy and transmission land use authorizations. All other activities will be subject to the NHPA Section 106 process. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| **Cultural Resources and Tribal Interests** | **GPL-CUL-1** | For renewable energy activities and transmission, the applicant is required to pay all appropriate costs associated with the following processes, through the appropriate BLM funding mechanism:<br>■ All appropriate costs associated with the BLM's analysis of the DRECP geodatabase and other sources for cultural resources sensitivity.<br>■ All appropriate costs associated with preliminary sensitivity analysis. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |

| General Public Lands | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | | ■ All appropriate costs associated with the Section 106 process including the identification and defining of cultural resources. These costs may also include logistical, travel, and other support costs incurred by tribes in the consultation process.<br>■ All appropriate costs associated with updating the DRECP cultural resources geodatabase with project specific results. | | | |
| | **GPL-CUL-2** | For renewable energy activities and transmission, management fee, defined at a per acre rate and annual escalation provision for the life of the grant, will paid to the BLM as partial mitigation for the cumulative effects on cultural resources across the DRECP Plan Area and may be used to develop regional research designs and other forms of off-site and compensatory mitigation. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-CUL-3** | For renewable energy activities and transmission, the management fee rate will be determined through the NHPA programmatic Section 106 consultation process that will be completed as part of the DRECP LUPA. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-CUL-4** | For renewable energy activities and transmission, applicant must demonstrate that results of cultural resources sensitivity, based on the DRECP geodatabase, and other sources, are used as part of the initial planning pre-application process and to select of specific footprints for further consideration. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-CUL-5** | For renewable energy activities and transmission, applicants will provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-CUL-6** | For renewable energy activities and transmission, applicants will provide justification in the application why the project considerations merit moving forward if the specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-CUL-7** | For renewable energy activities and transmission, applicants will complete the NHPA Section 106 Process as specified in 36 CFR Part 800, or via an alternate procedure, allowed for under 36 CFR Part 800.14 prior to issuing a ROD or ROW grant on any utility-scale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement, if applicable. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| **Lands and Realty** | **GPL-LANDS-1** | Lands within GPL are unavailable for disposal. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |

| General Public Lands | | | | | |
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| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **GPL-LANDS-2** | Cost recovery funding used to process a ROW application may be used to adjudicate and remedy any conflicting land withdrawals, if necessary. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| **Livestock Grazing** | **GPL-LIVE-1** | Avoid siting solar developments in active livestock grazing allotments. If a ROW is granted for solar development in an active livestock grazing allotment, prior to solar projects being constructed in active livestock allotments, an agreement must be reached with the grazing permittee/lessee on the 2-year notification requirements. If any rangeland improvements such as, but not limited to, fences, corrals, or water storage projects, are to be impacted by energy projects, reach agreement with the BLM and the grazing permittee/lessee on moving or replacing the range improvement. This includes the costs for NEPA, clearances, and materials. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-LIVE-2** | In California condor use areas, wind energy ROWs will include a term and condition requiring the permittee and wind operator to eliminate grazing of livestock. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-LIVE-3** | A no surface occupancy stipulation will be included on geothermal leases in active grazing allotments. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | | **Recreation and Visitor Services** | | | |
| **Recreation and Visitor Services** | **GPL-REC-1** | Retain, to the extent possible, the identified recreation setting characteristics: physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls (see recreation setting characteristics matrix). | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-REC-2** | Avoid large-scale ground disturbance within one-half mile of Level 3 Recreation facility footprint including route access and staging areas. If avoidance isn't practicable, the facility must be relocated to the same or higher standard and maintain recreation objectives and setting characteristics. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-REC-3** | When considering large-scale development in the GPL areas, retain to the extent possible existing, approved recreation activities.<br>**GPL Recreation Mitigation Measures**<br>If impacts to recreation opportunities or setting characteristics identified in RMPs, or activity plans for designated recreation areas (SRMA, ERMA, OHV Areas, etc.), from proposed activities are identified, one or more of the following mitigation measures will be applied. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |

| General Public Lands | | | | | |
|---|---|---|---|---|---|
| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| **GPL Recreation Mitigation Measures** | **GPL-REC-4** | For displacement of dispersed recreation opportunities, commensurate compensation in the form of enhanced recreation operations, recreation facilities or opportunities will be required. If recreation displacement results in resource damage due to increased use in other areas, mitigate that damage through whatever measures are most appropriate as determined by the Authorized Officer. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-REC-5** | Where activities displace authorized facilities, similar new recreation facilities/campgrounds (including but not limited to the installation of new structures including pit toilets, shade structures, picnic tables, installing interpretive panels, etc.), will be provided. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-REC-6** | If designated vehicle routes are directly impacted by activities (includes modification of existing route to accommodate industrial equipment, restricted access or full closure of designated route, pull outs, and staging area's to the public, etc.), mitigation will include the development of alternative routes to allow for continued vehicular access with proper signage, with a similar recreation experience. In addition, mitigation will also include the construction of an "OHV touring route" which circumvents the activity area and allows for interpretive signing materials to be placed at strategic locations along the new touring route, if determined to be appropriate by the Authorized Officer. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-REC-7** | Impacts from third-party activities to authorized Special Recreation Permit activities will be mitigated by providing necessary planning and NEPA compliance documentation for Special Recreation Permit replacement activities, as determined appropriate on a case-by-case basis. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-REC-8** | If residual impacts to SRMAs occur from third party activity impacts in GPLs areas, commensurate mitigation through relocation or replacement of facilities or compensation (in the form of a recreation operations and enhancement fund) will be required. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-REC-9** | Within ERMAs, impacts from third-party development projects that do not enhance conservation or recreation goals will require commensurate mitigation through relocation or replacement of facilities. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| **Visual Resources Management** | **GPL-VRM-1** | Development in GPLs is required to incorporate visual design standards and include the best available, most recent BMPs, as determined by BLM (e.g. Solar, Wind, West Wide Energy Corridor, and Geothermal PEISs, the Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands, and other programmatic BMP documents). | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |

| General Public Lands | | | | | |
|---|---|---|---|---|---|
| **Category** | **CMA #** | **CMA Text** | **Applica-bility** | **Explanation: Why CMA is not applicable** | **Comments** |
| | **GPL-VRM-2** | **Required Visual Resource BMPs.** All development will abide by the BMPs addressed in the most recent version of the document "*Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands"* or its replacement, including, but not limited to the following:<br>■ Transmission:<br>○ Color-treat monopoles Shadow Gray per the BLM Environmental Color Chart CC001 unless a more effective color choice is selected by the local Field Office VRM specialist.<br>○ Lattice towers and conductors will have non-specular qualities.<br>○ Lattice Towers will be located a minimum of 3/4 miles away from Key Observation Points such as roads, scenic overlooks, trails, campgrounds, navigable rivers and other areas people tend to congregate and located against a landscape backdrop when topography allows.<br>■ Solar – Color treat all facilities Shadow Gray from the BLM Environmental Color Chart CC001 unless a more effective color is selected by the Field Office VRM specialist, including but not limited to:<br>○ Concentrated solar thermal parabolic trough panel backs<br>○ Solar power tower heliostats<br>○ Solar power towers<br>○ Cooling towers<br>○ Power blocks<br>■ Wind – Color treat all facilities Shadow Gray with the exception of the wind turbine and towers 200 vertical feet or more.<br>■ Night Sky – BMPs to minimize impacts to night sky including light shielding will be employed. | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |
| | **GPL-VRM-3** | Regional mitigation is required for visual impacts in GPLs. Mitigation will be based on the VRI class and the underlying visual values (scenic quality, sensitivity, and distance zone) for the development area as it stands at the time the ROD is signed for the DRECP. Compensation may involve reclamation of visual impacts that are present within other areas designated as BLM VRM Class I or II lands (so that they are no longer visible in the long term), mitigation on BLM lands inventoried as having equal to or greater visual resource values, or amending RMP for lands located within VRM Class III or IV to a higher level of protection (VRM Class I or II) for areas that are visually intact with no cultural modifications and have visual resource inventoried values that are equal to or greater in value and place a protective Visual ACEC delineated around the compensatory mitigated area. The following mitigation ratios will be applied:<br>■ VRI Class II 2:1 ratio<br>■ VRI Class III 1:1 ratio<br>■ VRI Class IV no mitigation required<br>Additional mitigation will be required where projects affect viewsheds of specially designated areas (e.g., National Scenic and Historic Trails). | No | Project is not located in or near the area specified in the CMA. | The Easley Project is not located on General Public Lands; none of these CMAs apply. |

| Dropdown Info | | |
|---|---|---|
| **Col** | **Col** | **Notes** |
| **Yes** | Project not within the range or habitat of this species. | |
| **No** | Resource not found on the project site. | e.g., recreation CMAs that reference Tier 1 or 2 roads, and other specific rec resources |
| | Land use does not occur on project site. | e.g., grazing, mining, wild horses or burros etc. |
| | Project not located on federal lands with this designation. | e.g., ACEC, NLCS, etc. |
| | Resource is not within the buffer identified in the CMA. | For things like the rec and cultural buffers |
| | Project is not located in or near the area specified in the CMA. | Some CMAs are specific to Regions or FOs |
| | Project is not associated with a land exchange. | |

JULY 2024 SEPTEMBER 2024

S M T W T F S S M T

intersect I

8/6/24, 5:36 PM

Dear Supervisor Perez

I wanted to share with you some thoughts I have after visiting with Intersect Power this last week.
I met with Elizabeth Knowles and her team that were in Blythe giving out food for those less fortunate in the area. They knew that I was not a total fan of solar but certainly in favor of the sun energy but maybe not the locations to the East. However, knowing this and knowing that the area is already so impacted by solar development, it would be hard to stop this freight train...and I do believe in reaching rational decisions to create accord within the communities being affected. I asked them how much they had donated to the communities in their sphere and they said they would send me a bullet point of donations made when they returned to their offices. And they were in touch and provided the information within a few days...and they said I could share with some of the folks that are in opposition, which I did.
Intersect Power has gifted to the Desert Center area over 320,000.00 this past year which is a significant amount for the small community. Most of which has helped the school , and the children. Families that struggle to provide have also been helped with food donations. Intersect has also provided money for clean up around the major I-10 intersection at Desert Center which is a constant source of trash and other rubbish thrown out or left on the road areas...over 25,000 a year goes for this clean up...This is a major effort on their part.
I believe Intersect is listening and trying to resolve the issues that the folks have with set backs and visual and dust and I would hope that,if possible , projects could be developed for the next years for Intersect to help fund. It is better to resolve these issues now and try and have designated work that will be funded now and in the future and benefit from the solar neighbors and by doing so, everyone will move forward in a positive way.
I wanted you to know that I'm still not in love with covering our beautiful desert with solar panels, but they are here and we cannot change that so better to work together creating harmony rather than discord. We all must be willing to accept change as it is inevitable...even I have to embrace change.

I wanted you to know this and I am tickled that they will also be title sponsors for the General Patton Museum Veterans Day event Nov 11, 2024. Its been a tough year to fund raise.

My best, Margit

--

**Margit F. Chiriaco-Rusche**
(760) 485-1576 Mobile

Dear Members of the Riverside County Board of Supervisors,

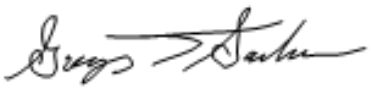
One of my roles as a superintendent is to create partnerships with local stakeholders within the school district. I am writing to express my appreciation for the outstanding support provided by Intersect Power to the Desert Center Unified School District in my time there as a superintendent/principal. In my opinion, their contributions have made a positive impact on the school and on the educational experiences of my students.

Some of the notable ways they have supported our school district include:

- Facilities Support: When our school faced plumbing issues, Intersect Power stepped in to help us keep our facilities operational by providing port-a-potties on three separate occasions. Furthermore, they generously donated a port-a-potty to our school, ensuring our school can remain open when future plumbing issues unexpectedly arise.
- Campus Beautification: Intersect Power organized a volunteer event where they donated $20,000 towards campus improvements. Their employees actively participated in a campus beautification volunteer effort that has contributed to a more engaging and welcoming space for our students.
- Educational Engagement: Intersect Power employees conducted a "Solar 101" educational presentation for the students o the school and took them on a tour of their Oberon project located within the school district. This hands-on experience not only enriched our students' knowledge but potentially inspired them to explore career opportunities in the field of renewable energy.
- Community Events and Donations: Intersect Power has also supported various school events and projects. They provided pumpkins for our Fall festival last year, donated $5,000 towards the ongoing development of the school garden, and made a significant $135,000 donation for the purchase of a new school bus and funding for our ELO summer programming for our students.

In my opinion, the stakeholder partnership has been notable, marked by a shared dedication to enhancing the educational experience and well-being of the students. Their ongoing support has had a tangible and positive impact on our school community, and for that, I am extremely grateful.

Sincerely,



Dr. Greg Sackos
Superintendent/Principal

FIND FOOD BANK
THE DESERT'S REGIONAL FOOD BANK
83775 CITRUS AVE INDIO, CA 92201

August 23, 2024

Riverside County Board of Supervisors
480 Lemon Street
Riverside, CA 92501

Dear Riverside County Board of Supervisors,

Please use this letter as confirmation of partner services between FIND and Intersect Power since 2023. Intersect Power's contribution and support to FIND has helped provide thousands of meals to those who are food insecure in the desert region. We appreciate Intersect Power's investment and efforts in prioritizing hunger relief for the children, families and seniors in Blythe and Desert Center region.

Sincerely,

Debbie Espinosa
President & CEO

August 9, 2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

As a Councilman, Riverside County LAFCO Commissioner, local Commercial Real Estate Agent, and longtime resident of La Quinta, I am pleased to offer my endorsement of the Easley Renewable Energy Project.

The Easley project will create more than 500 jobs, generate significant economic benefits for the County, and will deliver clean power to hundreds of thousands of homes.

Intersect Power, the Easley project developer, is the kind of company we want in Riverside County. Their advocacy for local labor, generous donations to local non-profits and the Desert Center school, and their responsiveness to community feedback by adjusting the project footprint, all demonstrate their commitment to the local community. Supporting such development and companies is vital for the County's growth and prosperity; as such, the County should support development and companies that serve and invest in the local community.

I support the Easley project, and I urge you to vote yes on this project.

Sincerely,

Steve Sanchez
La Quinta Councilman
Riverside County LAFCO Commissioner
Commercial Real Estate Agent

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

***SET FREE CHURCH DESERT CENTER***
***25980 Kaiser Road #103***
***Desert Center, California 92239***
***760-899-6669***

September 21, 2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Members of the Riverside County Board of Supervisors,

I hope this letter finds you well. I am writing to share with you the positive impact that Intersect Power, the Easley project developer, has had on our community here in Desert Center. As a leader of the Set Free Desert Center Church, I have had the privilege of witnessing firsthand the commitment and generosity demonstrated by Intersect Power. Their dedication to our community has been both significant and inspiring.

Recently, Intersect Power made a substantial donation to the Set Free Food Pantry, a food pantry in Desert Center, in partnership with the FIND Food Bank. Their donation covered the cost of food for an entire year. In addition to this generous contribution, they have also funded crucial upgrades to the pantry, ensuring that our food bank can continue to serve the needs of our residents efficiently and effectively.

On behalf of Set Free Desert Center Church and the residents of Desert Center, I want to applaud Intersect Power for these efforts that have made a remarkable impact on our community, and I am hopeful to continue our community partnership.

Sincerely,
Jeni Navarro
Set Free Desert Center Church

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am reaching out to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Jose A. Lagunes

Subject: Strong Support for Easley Solar Project and its Local Job Creation

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am writing to you as a union worker eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As a member of the local community whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

The Easley Solar Project will create jobs in our region through its construction and operation phases. This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents more broadly. Supporting infrastructure development projects like the Easley Solar Project is crucial for bolstering the Riverside County job market and providing sustainable employment for local workers.

In addition to the Project's economic benefits, its advancement of renewable energy aligns with our values as union workers concerned about the environment. By reducing greenhouse gas emissions, the Easley Solar Project contributes to a cleaner and more sustainable future for our community.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the workforce. This inclusive approach reflects a dedication to creating a project that not only meets its energy production goals but also enhances the lives of area residents through job creation and community engagement.

As a union worker, I look forward to the positive impact the Easley Solar Project will have on our community and call on the Riverside County Supervisors to approve it.

Sincerely,

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

I am reaching out to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union worker and member of the community, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operational phases. This Project not only offers personal employment prospects for workers like me but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure development projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

We appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy underscores a genuine commitment to developing a project that not only achieves its renewable energy objectives but also enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,

Nicholas Lua

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am reaching out to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Jose Grijalva IV

X Jose Grijalva IV

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

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Sincerely,

Subject: Laborer Support for Easley Solar Project

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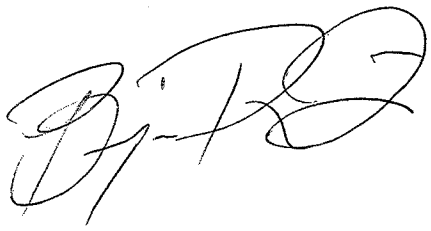
As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,



7/18/2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

I am a Desert Center property owner, and I am proud to offer my endorsement of the Easley Renewable Energy Project. I have owned property in Desert Center for more than 12 years and I support other businesses that serve and support local communities. In my opinion, solar projects are a great use of the area.

The Easley project is a great development for Desert Center. It is already designated for solar energy uses and it is setback from existing development in the area. Also, implementation of this project will drive significant job creation and economic growth in the Desert Center area and broader Riverside County.

I would be proud to have the Easley project in my neighborhood of Desert Center, and I urge the County to vote yes on this project.

Sincerely,

Douglas Percival
Homeowner at 26800 Fairway Drive, Desert Center, CA 92239
(Lake Tamarisk)

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

29335 Wrangler Dr
Murrieta, CA 92563

8/6/2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

As a resident of Riverside County, I am pleased to offer my endorsement of the Easley Renewable Energy Project. The Easley project will create more than 500 jobs and generate economic opportunities for many Riverside County businesses.

I moved to Riverside County this year and I support other businesses that serve and support local communities. The Easley solar project is an example of a business that has demonstrated a commitment to local hire, procurement and community service. Intersect Power is a small San Francisco-based company with a goal to develop clean energy to benefit current and future generations of California residents and businesses. I support the Easley project and I urge you to vote yes on this project.

Sincerely,

Nicholas Barrientos
29335 Wrangler Dr
Murrieta, CA 92563

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

July 30, 2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

I am a former Desert Center property owner, and I am proud to offer my endorsement of the Easley Renewable Energy Project. The project is in an area of Desert Center that is designated for solar energy uses and Intersect Power has designed the project to minimize any impacts to nearby development in the area.

We have found Intersect Power to be a great neighbor in Desert Center throughout the recent years.

The Easley project is a great development for Desert Center. I urge the County to vote yes on this project.

Sincerely,

JoAnn Dean

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

7/29/24

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Re: Support for Easley Renewable Energy Project

Dear Supervisors:

I am a Desert Center property owner and Riverside County resident, and I am proud to offer my endorsement of the Easley Renewable Energy Project. I have owned property in Desert Center for more than 10 years.

The Easley project is a boon for Desert Center because it brings much needed economic development and good paying jobs to the area. Long term, this and other solar energy projects help decrease our nation's reliance on fossil fuels and provide a Green, sustainable energy source..

It is important to note that the project area is already designated for solar energy uses, and it is generously set back in distance from existing residential development in the area.

I proudly urge the County to vote "Yes" on this project.

Sincerely,

DocuSigned by:
Philip Percival
42E434A92E1A46A...

Philip Percival
Real Estate Broker - BRE #01420682

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

Intersect Power

**Charity Wagner <charity.wagner@intersectpower.com>**

# Easley Solar Project

**Brian Johnson** <johnsonmobileestates@gmail.com> Tue, Jul 30, 2024 at 10:04 AM
To: KSSpiegel@rivco.org, PPaule@rivco.org, v.mperez@rivco.org, SAHERNAN@rivco.org, District1@rivco.org, JTGreene@rivco.org, C.Washington@rivco.org, RBrock@rivco.org, district5@rivco.org, Twheeler@rivco.org, Dedgington@rivco.org
Bcc: charity.wagner@intersectpower.com

July 30, 2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

I am a Desert Center property owner, and I am proud to offer my endorsement of the Easley Renewable Energy Project. I have owned and operated a land and business Desert Center for more than 44 years and I support other businesses that serve and support local communities.

The Easley project is a great development for Desert Center. It is already designated for solar energy uses and it is setback from existing development in the area. Also, implementation of this project will drive significant job creation and economic growth in the Desert Center area and broader Riverside County.

I would be proud to have the Easley project in my neighborhood of Desert Center, and I urge the County to vote yes on this project.

Sincerely,

Brian Johnson
JMP Inc

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

**JMP Support Letter Desert Center Easley Project.docx**
347K

07/25/2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

As a renewable energy construction site supervisor living and working in Riverside County, I am pleased to offer my endorsement of the Easley Renewable Energy Project. I have seen firsthand how many jobs, industries, and personnel are directly positively impacted by renewable projects. At the Oberon 1&2 Project, also developed by Intersect Power currently providing renewable energy, all personnel employed on site live in Riverside County and directly benefit from the energy and jobs provided. The Oberon Solar Project created more than 930 union jobs and accounted for more than $30 million in direct investment to Riverside County. In addition to the permanently employed personnel at the Oberon Solar Project, we look to local businesses and industries to provide the services we need when available. The Easley project will create more than 500 jobs and generate economic opportunities for many Riverside County businesses.

Local job creation is an enormously important benefit of procuring large-scale renewable energy. The Easley project and its developer, Intersect Power, are collaborating with local firms which have come to realize this important project. They have also demonstrated their commitment to ensuring local labor will benefit from the project by entering into a project labor agreement with local unions. The Easley Project is a terrific way for Riverside County to continue its growth in number of jobs created and renewable energy provided.

I have lived in worked in Riverside County for just over a year and I support other businesses that serve and support local communities. Renewable projects like Easley are what brought my family and I to the region and is something I have been enthusiastic about for a long time. The Easley solar project is an example of a business that has demonstrated a commitment to local hire, procurement, and community service. Intersect Power is a small San Francisco-based company with a goal to develop clean energy to benefit current and future generations of California residents and businesses. I support the Easley project and I urge you to vote yes on this project.

Sincerely,

Aaron Hodges
Site Supervisor- Oberon 1&2 Solar Project
27200 Rice Rd. Desert Center, CA 92239

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

08/05/2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

My name is Emanuel Hernandez. I am a site supervisor for the Athos III solar project in Blythe, Riverside County. I am pleased to offer my endorsement of the Easley Renewable Energy Project. I have worked in Riverside County for two years and I support other businesses that serve and support local communities. We also use various local Riverside contractors and businesses for any work that is needed for the site.

The Easley project and its developer, Intersect Power, have demonstrated their commitment to ensuring local labor will benefit from the project by entering into a project labor agreement with local unions. Local job creation is an enormously important benefit of procuring large-scale renewable energy. I know this firsthand because I am currently employed on a renewable energy project in Riverside County. My work in renewable energy supports my family and allows to work pretty close to home, and not have to commute to other states for work.

The Easley solar project is an example of a business that has demonstrated a commitment to local hire, procurement and community service. They hire folks like me to successfully implement projects. For all these reasons, I support the Easley project and I urge you to vote yes on this project.

Sincerely,

Emanuel Hernandez Uribe
Site Supervisor
BMS2, CAL1, SGAH, SGAK, SGSO
P:760-554-8470 | emanuel.hernandez@novasourcepower.com

NOVASOURCE™
POWER SERVICES

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

GREATER COACHELLA VALLEY CHAMBER

Dear Mr. Wheeler,

I am writing on behalf of the Greater Coachella Valley Chamber of Commerce to express our enthusiastic support for Intersect Power's Easley Solar Project, which is poised to make a significant positive impact on Riverside County.

Beyond the immediate economic benefits, Intersect Power has demonstrated a strong commitment to social investment in the Riverside County area. They have a track record of engaging with local communities and supporting initiatives that enhance the quality of life for residents. Their dedication to responsible development includes measures to protect the environment and collaborate with stakeholders to address concerns.

We appreciate Intersect Power's commitment to partnering with local organizations, such as the Greater Coachella Valley Chamber of Commerce, to foster positive relationships and ensure the project's success benefits our community. This engagement and their willingness to work closely with the residents of Riverside County exemplify their dedication to being good corporate citizens.

We believe that this project not only represents a significant step towards a sustainable energy future but also a remarkable opportunity for economic growth and community development in Riverside County. We urge the Bureau of Land Management to give favorable consideration to this project, taking into account its substantial economic benefits and the commitment of Intersect Power to support the local area.

Thank you for your attention to this matter, and we look forward to witnessing the positive impacts that the Easley Solar Project will bring to our community.

Sincerely,

Brandon Marley, President & CEO

Greater Coachella Valley Chamber of Commerce

Audubon

Riverside County Planning Department
Attn: Tim Wheeler, Project Planner
48 Lemon Street, 12th Floor
Riverside, CA 92502
TWheeler@rivco.org

cc: Darren Edgington (DEdgingt@rivco.org)
Supervisor Manuel Perez (v.mperez@rivco.org)
Steve Hernandez (sahernan@rivco.org)

Dear Mr. Wheeler:

Thank you for the opportunity to comment on the recirculated Draft Environmental Impact Report (DEIR) for the Easley Solar Project.

Audubon protects birds and the places birds need, today and tomorrow. Audubon works throughout the Americas using science, advocacy, education, and on-the-ground conservation. State programs, nature centers, chapters, and partners give Audubon an unparalleled wingspan that reaches millions of people each year to inform, inspire, and unite diverse communities in conservation action. A nonprofit conservation organization since 1905, Audubon believes in a world in which people and wildlife thrive.

Our 2019 climate science available at https://climate.audubon.org reveals that unless we can keep warming below 3° Celsius, 389 species of birds in North America will probably go extinct from loss of climate suitability in their wintering or breeding ranges. One hundred percent clean energy and net zero emissions by 2050 is our goal to protect our birds by keeping warming to 1.5°Celsius. For birds and many other wildlife species, however, climate change planning must do more; it must both preserve key resources and habitats needed in coming decades as warming increases, as well as protect climate strongholds resilient to climate change that will provide a safe haven for many decades to come. These issues are especially true in the desert southwest, where increasing the development of renewables while protecting habitats and species is most challenging.

The Project

IP Easley, LLC, IP Easley II, LLC, and IP Easley III, LLC, subsidiaries of Intersect Power, LLC, propose to construct, operate and decommission the Easley Renewable Energy Project (Easley Project or Project), 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 proposed Project application area is located on approximately 3,735 acres of private and BLM-administered land, in Riverside County north of Desert Center, California. The Project would generate up to 400 megawatts (MW) of renewable electricity via arrays of solar photovoltaic (PV) panels, store up to 650 MW in a battery energy storage system (BESS), and include appurtenant facilities. A 6.7-mile 500 kilovolt (kV) generation-tie (gen-tie) line would mainly traverse across the Oberon Renewable Energy Project site (south of the Project site) and connect into an existing substation on the approved Oberon Project site. The Oberon Project is a solar PV and energy storage facility owned by Intersect Power. From the Oberon onsite substation, the power generated by the Easley Project would be transmitted to the Southern California Edison (SCE) Red Bluff Substation via the existing Oberon 500 kV gen-tie line.

We appreciate the "significant new information" added to the recirculated DEIR especially the Best Management Practices and BLM Conservation and Management Actions, additional Alternatives and additions to the Biological Resources and the Appendices including the Bird & Bat Conservation Strategy and Nesting Bird Management Plan.

Support for Project Action Alternative

Audubon's long-standing policy is to support clean energy projects that are well-sited and operated to avoid, minimize, and mitigate effectively for the impacts on birds and the places birds need, especially to adapt to climate change.

As a stakeholder in the Desert Renewable Energy Conservation Plan (DRECP) we support development of wind and solar in the Development Focus Areas (DFAs) using the Conservation Management Actions (CMAs) of the DRECP, especially to address the impacts of the project on microphyll or desert dry wash woodlands. *('dry washes occupy less than 5% of this subsection of the Sonoran desert but support 90% of its bird life" – Mark Dimmitt, A Natural History of the Sonoran Desert, 2000*).

We see that the Easley Project has committed to these CMAs on public as well as private lands. Key to siting of utility-scale solar energy is adhering to the Mitigation Hierarchy of addressing impacts: avoid first, minimize what can't be avoided, and as a last measure provide compensatory mitigation to offset the loss due to impacts that cannot be avoided or minimized.

Easley is located on a combination of previously disturbed, former agricultural private land and public land designated by the DRECP as a Development Focus Area (DFA). The siting of the Easley Renewable Energy Project on lower-quality habitat and the Project's adherence to the DRECP's Conservation and Management Actions (CMAs) on both public and private lands will ensure avoidance, minimization, and mitigation of birds, other wildlife, and other environmental impacts. The project is an example of how responsible siting and operation can bring conservation and clean energy hand in hand in difficult environments.

The Easley project's Draft Environmental Impact Report (EIR), including the Partially Recirculated Draft EIR, clearly identifies the impacts and necessary mitigation for species affected by the project.

Audubon also supports the Easley Project's Bird and Bat Conservation Strategy (BBCS), which has taken lessons learned and best practices from other solar projects in the region to ensure effective avoidance, minimization, and mitigation for impacted bird species throughout both construction and the operational life of the Project.

However, we propose an addition to the monitoring and adaptive management section of that BBCS.

In June 2024, the California Energy Commission (CEC) released a report titled Investigating the "Lake Effect" Influence on Avian Behavior from California's Utility-Scale Photovoltaic Solar Facilities. The report looked at utility-scale solar facilities in California and examined the so-called lake effect hypothesis that aquatic birds may mistake a large field of solar panels as a water body, and this attraction could lead to death or injury when birds attempt to land. The results from this research are largely consistent with the lake effect hypothesis in some instances depending on species, time of day, flight path and other circumstances. However, the study did not confirm that the possible attraction of aquatic birds to PV light from solar panels resulted in collision and mortality, and advised that further research is needed. It is also unknown if this attraction is widespread and not just limited to some solar projects in the desert of California.

Accordingly, we recommend that the BBCS include a monitoring and adaptive management plan that will document the interaction of birds with the project in real time, and recommend that recently developed camera + AI technology, if commercially available or available in kind from Argonne National Labs, be used so that avoidance rates as well as any potential collision rates be recorded. This methodology in our opinion is preferable to carcass searches by biologists and/or dogs.

In conclusion, Audubon recommends that the County and the BLM approve the Easley project's Reduced Footprint Alternative. In our opinion this Alternative best represents a responsible approach to renewable energy development that balances the need for clean energy with prioritizing important wildlife habitats and community interests.

Thank you for the opportunity to comment.

Sincerely,

Garry George
Senior Director, Climate Strategy
Director, Clean Energy Initiative
Audubon
garry.george@audubon.org

29335 Wrangler Dr
Murrieta, CA 92563

8/6/2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

As a resident of Riverside County, I am pleased to offer my endorsement of the Easley Renewable Energy Project. The Easley project will create more than 500 jobs and generate economic opportunities for many Riverside County businesses.

I moved to Riverside County this year and I support other businesses that serve and support local communities. The Easley solar project is an example of a business that has demonstrated a commitment to local hire, procurement and community service. Intersect Power is a small San Francisco-based company with a goal to develop clean energy to benefit current and future generations of California residents and businesses. I support the Easley project and I urge you to vote yes on this project.

Sincerely,

Nicholas Barrientos
29335 Wrangler Dr
Murrieta, CA 92563

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

INTERNATIONAL BROTHERHOOD of ELECTRICAL WORKERS

Local Union 440

1405 Spruce Street, Suite G
Riverside, CA 92507
TEL (951) 684-5665
FAX (951) 369-9032

March 15, 2024

Tim Wheeler
twheeler@rivco.org
County of Riverside, Planning Dept.

Subject: Endorsement of Intersect Power's Easley Solar Project and EIR

Dear Mr. Wheeler,

As the Business Manager of the International Brotherhood of Electrical Workers (IBEW), I am proud to endorse Intersect Power's Easley Solar Project. This infrastructure project holds immense potential to drive job creation and economic growth in the Desert Center area and broader Riverside County.

We support both the Proposed Project and the Lake Tamarisk Alternative, as discussed in the draft Environmental Impact Report (EIR), and believe that all impacts, as described, would be sufficiently mitigated by the Mitigation Measures included in the EIR. We appreciate that the Lake Tamarisk Alternative was developed in response to the local community's concern and believe it adequately addresses impacts to local residents.

The Easley Solar Project promises to inject vitality into our local economy by generating employment opportunities and stimulating economic activity. With its implementation, we anticipate a surge in job opportunities and an expansion of the tax base, providing much-needed resources for public services and infrastructure development.

We believe that supporting projects like Easley Solar is crucial for the prosperity of our community and the advancement of our workforce. Therefore, we urge you to prioritize its approval and implementation.

Thank you for your attention to this matter. Please do not hesitate to contact us for further information or assistance.

Sincerely,

Jeremy Forshaw
Business Manager
IBEW Local 440

JF: lt

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Alfonso Barajas 7-12-24

IBEW Local 440

Alfonso Barajas

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Andrew Vasquez

IBEW Local 440

7/12/24

Subject: Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union member, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operation. This project not only offers personal employment prospects for workers like me, but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

I really appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy really shows Intersect's genuine commitment to developing a project that achieves its renewable energy objectives and enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and respectfully ask the Riverside County supervisors to approve it.

Thank you,

Kevin Hachae 7/12/2024

IBEW Local 440

Subject: Strong Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member, eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As an active member of IBEW Local 440 whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the local workforce.

I look forward to the positive impact the Easley Solar Project will have on our community, and I urge the Riverside County Supervisors to approve it.

Thank you,

Andrew Santana

IBEW Local 440

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

IBEW Local 440

Sergio Rocha

Subject: Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union member, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operation. This project not only offers personal employment prospects for workers like me, but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

I really appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy really shows Intersect's genuine commitment to developing a project that achieves its renewable energy objectives and enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and respectfully ask the Riverside County supervisors to approve it.

Thank you,

Juan Cruz Santana #8359254

IBEW Local 440

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

RAYMOND MARTINEZ #D861110

IBEW Local 440

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am reaching out to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project. X [signature] 8-22-24

Thank you,

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am reaching out to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Raul Avitia

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am reaching out to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

I am reaching out to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union worker and member of the community, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operational phases. This Project not only offers personal employment prospects for workers like me but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure development projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

We appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy underscores a genuine commitment to developing a project that not only achieves its renewable energy objectives but also enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,

Sergio Garcia

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

I am reaching out to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union worker and member of the community, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operational phases. This Project not only offers personal employment prospects for workers like me but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure development projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

We appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy underscores a genuine commitment to developing a project that not only achieves its renewable energy objectives but also enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,

Subject: Laborer Support for Easley Solar Project

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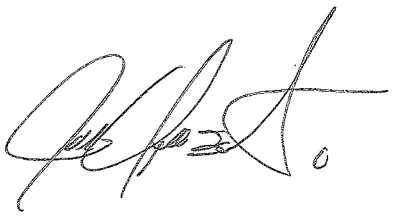
The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operational phases. This Project not only offers personal employment prospects for workers like me but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure development projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

We appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy underscores a genuine commitment to developing a project that not only achieves its renewable energy objectives but also enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,



JUAN URQUIZO

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

IBEW Local 440

Subject: Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union member, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operation. This project not only offers personal employment prospects for workers like me, but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

I really appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy really shows Intersect's genuine commitment to developing a project that achieves its renewable energy objectives and enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and respectfully ask the Riverside County supervisors to approve it.

Thank you,

IBEW Local 440

MARCUS BLACKWELL

Subject: Strong Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member, eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As an active member of IBEW Local 440 whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the local workforce.

I look forward to the positive impact the Easley Solar Project will have on our community, and I urge the Riverside County Supervisors to approve it.

Thank you,

IBEW Local 440

Khadeejah Soper

Subject: Strong Support for Easley Solar Project

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I look forward to the positive impact the Easley Solar Project will have on our community, and I urge the Riverside County Supervisors to approve it.

Thank you,

IBEW Local 440

VICENTE AGUIRRE

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

IBEW Local 440

Colton Torrez

Subject: Support for Easley Solar Project and its Creation of Local Jobs

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Thank you,

IBEW Local 440

Mike St.

Subject: Strong Support for Easley Solar Project

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Thank you,

John Rush

IBEW Local 440

TIMOTHY WOOTEN

Subject: Support for Easley Solar Project

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Jacob Barajas

IBEW Local 440

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Thank you,

Gabriel Rivera

IBEW Local 440

Anthony Larner

Subject: Support for Easley Solar Project and its Creation of Local Jobs

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I urge you to approve the Easley Project.

Thank you,

A. Larner 7/12/24

IBEW Local 440

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Thank you,

Zachary Ramirez

07/12/2024

IBEW Local 440

Lazaro Garcia

Subject: Support for Easley Solar Project

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IBEW Local 440

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Anthony Lopez

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Thank you,

Alberto Esparza

IBEW Local 440

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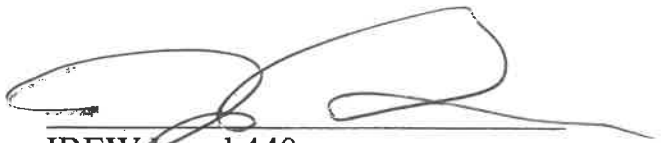

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Thank you,

Avery Morris LU#440

IBEW Local 440 #7847343

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The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operation. This project not only offers personal employment prospects for workers like me, but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

I really appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy really shows Intersect's genuine commitment to developing a project that achieves its renewable energy objectives and enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and respectfully ask the Riverside County supervisors to approve it.

Thank you,

Juan Valencia

IBEW Local 440

Subject: Support for Easley Solar Project

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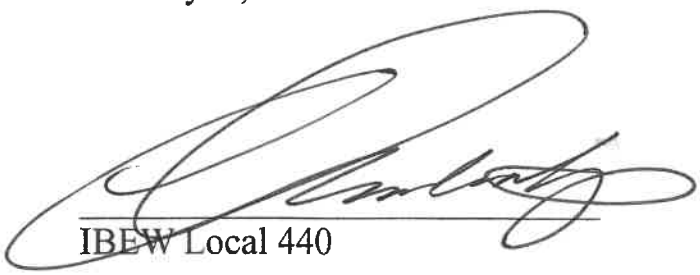

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IBEW Local 440

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Subject: Laborer Support for Easley Solar Project

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Sincerely,

X Jose Angel Gonzalez

Subject: Strong Support for Easley Solar Project and its Local Job Creation

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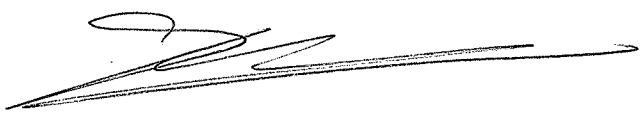

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The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

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Subject: Laborer Support for Easley Solar Project

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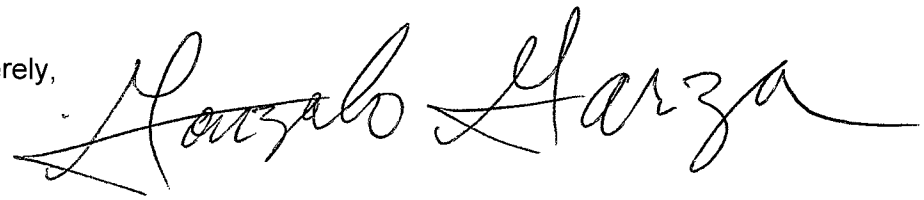

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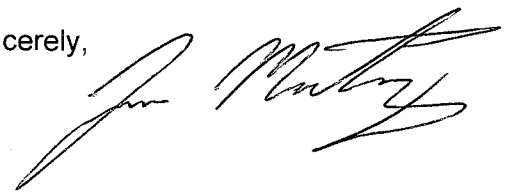

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As a union worker, I look forward to the positive impact the Easley Solar Project will have on our community and call on the Riverside County Supervisors to approve it.

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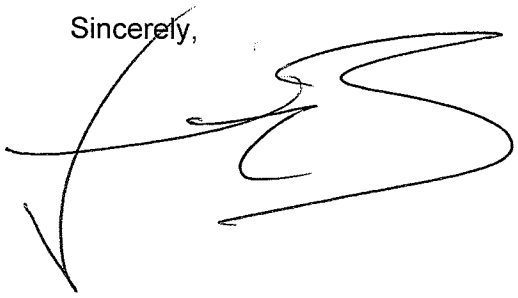

Subject: Strong Support for Easley Solar Project and its Local Job Creation

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am writing to you as a union worker eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As a member of the local community whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

The Easley Solar Project will create jobs in our region through its construction and operation phases. This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents more broadly. Supporting infrastructure development projects like the Easley Solar Project is crucial for bolstering the Riverside County job market and providing sustainable employment for local workers.

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Subject: Support for the Easley Solar Project and its Creation of Local Jobs

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The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

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I urge you to approve the Easley Project.

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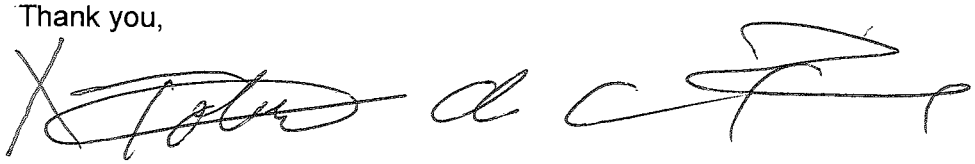

Subject: Laborer Support for Easley Solar Project

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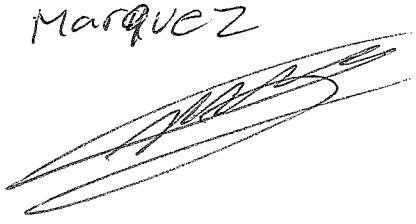
Jose Marquez



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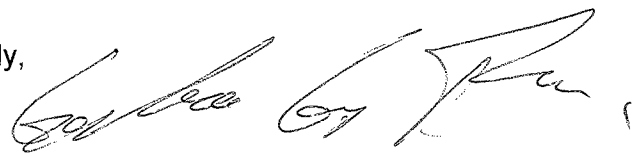

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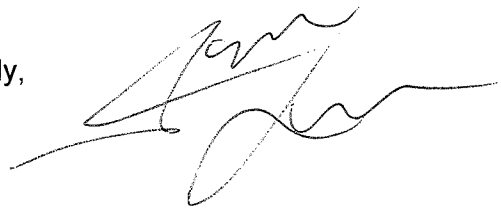

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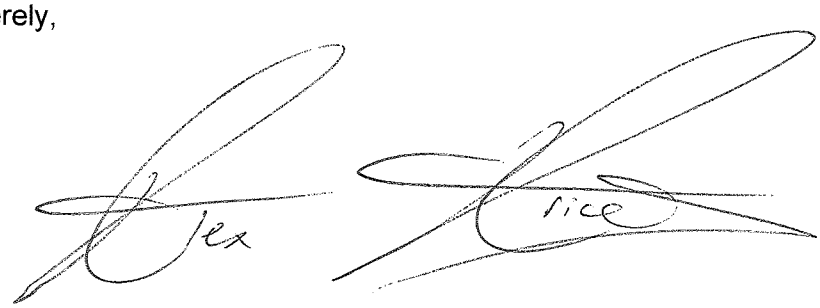

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Nick Gumbleton
Local 1184

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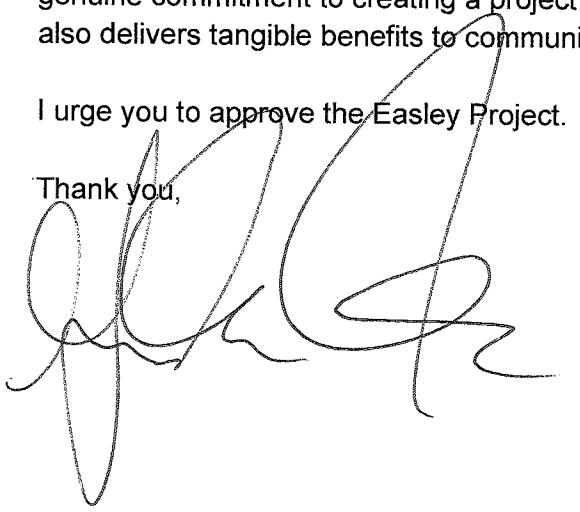

5/31/24

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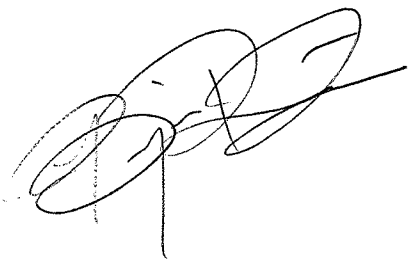

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Thank you,

Roberto Velez

Subject: Strong Support for Easley Solar Project and its Local Job Creation

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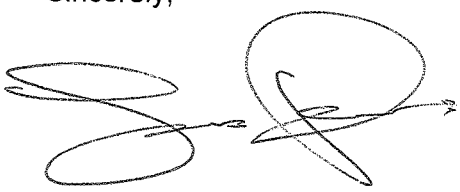

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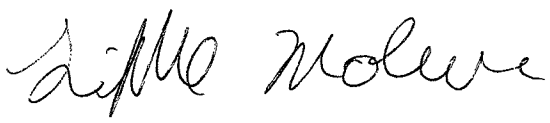

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Felipe Aragón

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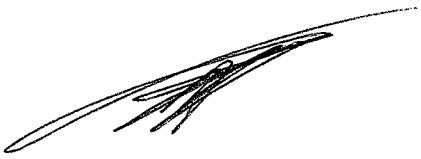

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The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

I am reaching out to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union worker and member of the community, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operational phases. This Project not only offers personal employment prospects for workers like me but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure development projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

We appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy underscores a genuine commitment to developing a project that not only achieves its renewable energy objectives but also enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,

Samuel Castro

Subject: Strong Support for Easley Solar Project and its Local Job Creation

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Jose Castro

John Castro

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

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Terry Daniels

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

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Carol Vallejos

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Claudio D. R.

Luiz

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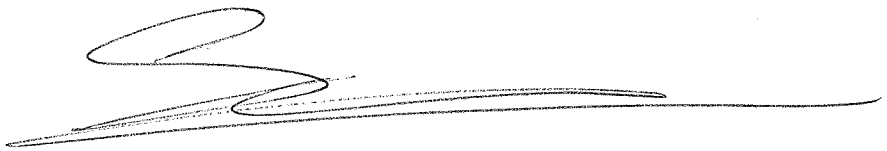

Sergio Torres Jr

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Jorge Reyes

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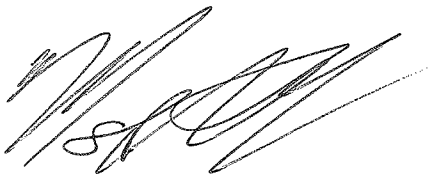

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Marco Garcia

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

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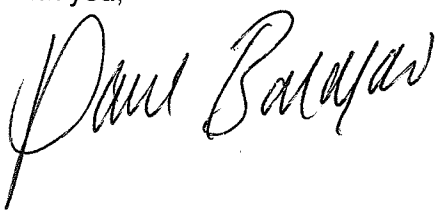

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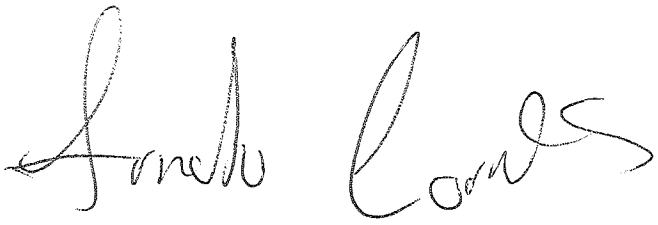

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Thank you,

Francisco Nuñez

Subject: Laborer Support for Easley Solar Project

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Francisco Sanchez

Subject: Strong Support for Easley Solar Project and its Local Job Creation

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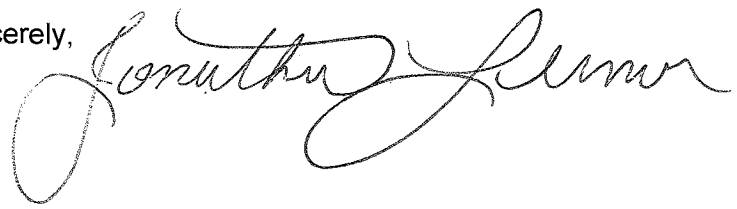

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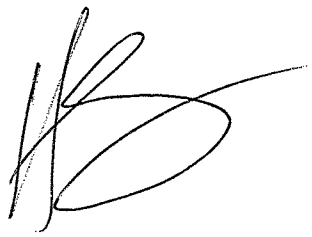

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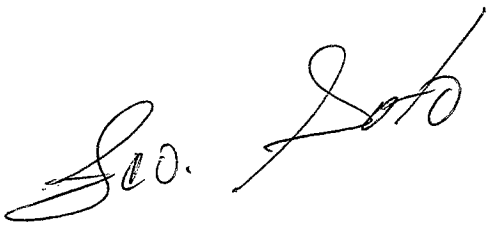

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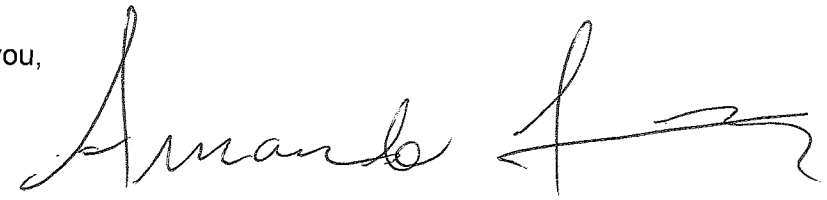

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I am reaching out to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Trevor Reasor

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Derek Patrick Burnham

6-26-24

Subject: Strong Support for Easley Solar Project and its Local Job Creation

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As a union worker, I look forward to the positive impact the Easley Solar Project will have on our community and call on the Riverside County Supervisors to approve it.

Sincerely,

Jose Marquez

Subject: Laborer Support for Easley Solar Project

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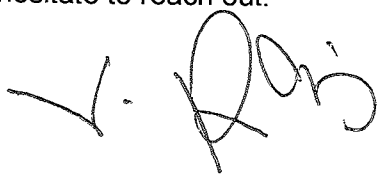

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Subject: Strong Support for Easley Solar Project and its Local Job Creation

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Thank you,

JUAN PARRA JR. 7-26-24

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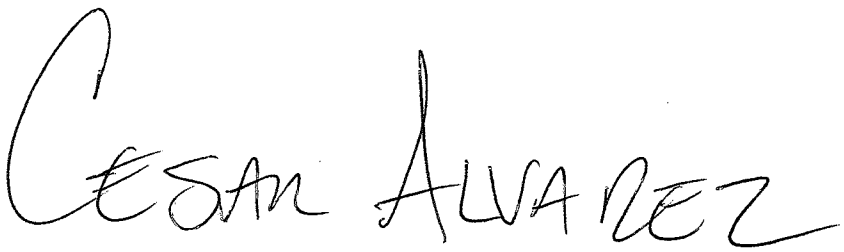

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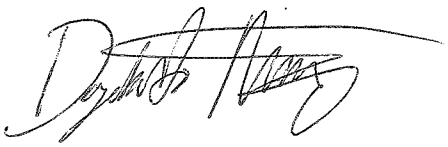

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Thank you,

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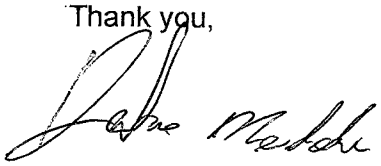

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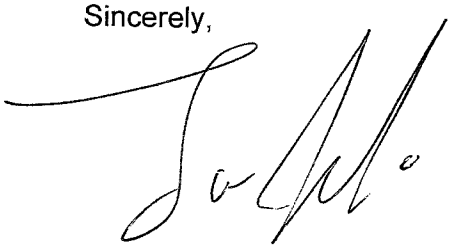
Sincerely,



Subject: Strong Support for Easley Solar Project and its Local Job Creation

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am writing to you as a union worker eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As a member of the local community whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

The Easley Solar Project will create jobs in our region through its construction and operation phases. This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents more broadly. Supporting infrastructure development projects like the Easley Solar Project is crucial for bolstering the Riverside County job market and providing sustainable employment for local workers.

In addition to the Project's economic benefits, its advancement of renewable energy aligns with our values as union workers concerned about the environment. By reducing greenhouse gas emissions, the Easley Solar Project contributes to a cleaner and more sustainable future for our community.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the workforce. This inclusive approach reflects a dedication to creating a project that not only meets its energy production goals but also enhances the lives of area residents through job creation and community engagement.

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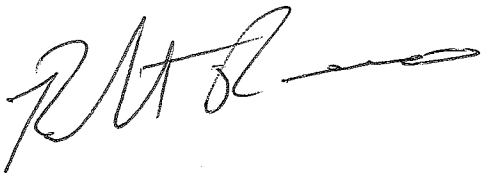

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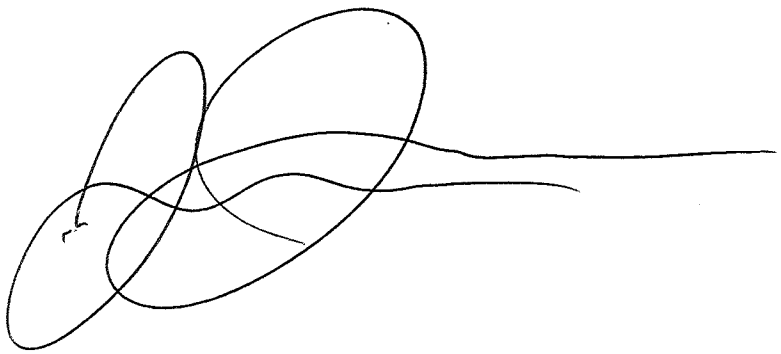

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Sincerely,

Juan Jose Paz

Juan Jose Paz

Intersect Power

intersectpower.com

# Easley Renewable Energy Project
# Summary of Riverside County Economic Benefits

| Economic Metric | Operational Life Total |
|---|---|
| **Local Sales Tax** | **$23,726,000** |
| **Local Property Tax** | **$96,100,000** |
| **DA Development Impact + Community Benefit Fee** | **$785,000** |
| **DA Solar B-29 Public Benefit Fee** | **$15,266,000** |
| **Total Direct Contribution to Riverside County** | **$135,877,000** |
| **Local Land Purchase Payments to Landowners** | **$18,000,000** |
| **Voluntary Social Investment - Donations to Local Organizations** | **$3,500,000** |
| **Total Direct Contribution to Local Community** | **$21,500,000** |
| **Modeled Indirect Local Expenditures** | **$146,610,000** |
| **Grand Total** | **$303,987,000** |
| **Construction Jobs** | **530** temporary |
| **Operations Jobs** | **10** permanent |
| **Total Jobs** | **540** |

**NOTE:** Figures are estimates assuming approval of FEIR Reduced Footprint Alternative B in Aug 2024. Actuals may vary based on selected Alternative, change in tax law, and other variables. Indirect local expenditures modeled in IMPLAN. Figures assume 50yr operational life, consistent with CUP duration. Development Agreement figures assume DA term of 30 years.

**UPDATED Summary of Intersect Power's Interactions with Local Lake Tamarisk & Desert Center Community During Easley Permitting Process (as of 8/23/2024)**

**Since beginning development of the Easley Project, Intersect Power has:**

- Exchanged **hundreds (220+) of** phone calls, emails, and texts with members of the Lake Tamarisk and Desert Center communities and responded to numerous questions & concerns raised by local community members
- Met in-person with the local community in Lake Tamarisk/Desert Center area **eight** times, including hosting an open house for community members to learn about and provide feedback on the proposed project, **four** meetings to discuss the project, as well as **three** tours with community members to understand visual, recreation, hydrological, and other resources important to the community
- Met over zoom with the local Lake Tamarisk and Desert Center communities **eleven** times, including **two** zoom calls with members of Lake Tamarisk Desert Resort, **two** zoom meetings with stakeholders from the Chuckwalla Valley Raceway, **five** zoom meetings with stakeholders from Desert Center Unified School District, and **two** zoom meetings with leadership of the Set Free Desert Center Church
- Organized **two local volunteer events** in which members of the Intersect Power team traveled to the Desert Center and Blythe areas and distributed food to individuals/families in need in coordination with FIND Food Bank and completed campus restoration projects for Eagle Mountain School
- **Donated over $350,000** to Riverside County non-profit organizations, school district, museum, and towards local events
- Provided **fourteen** courtesy notifications to the local community regarding NEPA/CEQA milestones and on-site surveys/activity
- Beyond local community, also had **seven** meetings (combination of in-person/zoom) with local environmental NGO and tribal stakeholders regarding the proposed Easley project

**Detail on Lake Tamarisk/Desert Center Community Communication since CUP Application Filing Mid-2022**

**2022:**

- **Oct:**
  - Initial correspondence & conversations with members of Lake Tamarisk & Desert Center community about the proposed Easley project. Most of the correspondence centered around the community's questions and concerns regarding the initial project details and upcoming permitting process.
- **Nov:**
  - Phone discussion with Lake Tamarisk Board President, Kim Frazier

    - Various phone, email conversations with members of Lake Tamarisk (including Teresa Pierce)
- **Dec:**
    - In-person meeting with Lake Tamarisk Solar Committee (Mark Carrington, Teresa Pierce, Vicki Bucklin, others) at Teresa Pierce's home in LT
    - Zoom meeting with Lake Tamarisk community members to discuss hydrology concerns
    - Various phone, email, text conversations with members of Lake Tamarisk and property owners near Easley (including 3 phone calls, multiple texts with Teresa Pierce, various texts with Mark Carrington, phone call with Gary Warner, others)

**2023:**

- **Jan:** Various phone, email, text conversations with members of Lake Tamarisk answering questions and planning Feb open house
- **Feb:**
    - In-person open house at Lake Tamarisk rec center to discuss project (~100 attendees from Lake Tamarisk and Desert Center communities)
    - LT takes IP representatives on tour of nearby ATV trails
    - IP facilitates introduction to SB Energy for Mark Carrington regarding lighting concerns with Athos I&II project
    - Various phone, email, text conversations with members of Lake Tamarisk (including multiple with Teresa Pierce, Mark Carrington)
- **Mar:**
    - IP discusses compromise alternative (now Alt B, reduced footprint alt) with Lake Tamarisk community. Alt B increases project setback from community & moves substation further away out of line of sight directly in response to feedback received from community members in late 2022, early 2023
    - Various phone, email, text conversations with members of Lake Tamarisk (including phone calls with Don Sneddon and Gary Warner, and 4+ phone calls, multiple text message exchanges with Mark Carrington, correspondence with Teresa Pierce, others)
    -
- **Apr:**
    - Various phone, email, text conversations with members of Lake Tamarisk (including multiple phone calls, text conversations with Mark Carrington and others)
    - Initial zoom meeting with Desert Center Unified School District to introduce project and discuss community needs.
        - Subsequent $5,000 donation to Eagle Mountain School to create a school community garden
    - $15,000 donation to FIND Food Bank
    - Todd Casper, IP Construction Manager, provides tour of Oberon site to LT Resort Members, Vicki Buckland & Mark Carrington

  - IP provides courtesy notification of onsite activity
  - IP meets virtually with Set Free Desert Center Church to discuss project and understand community needs
- **May-Aug 2023**
  - Communication slows considerably from Lake Tamarisk Community with most resort members gone for summer months
  -
- **Sept:**
  - Phone conversation/email correspondence with LT solar committee in which IP offers to pay for vegetative screening on LT property to screen project from view; to date, no response has been received despite follow-up
  - Various phone, email, text conversations with members of Lake Tamarisk
  - IP sends notifications to all Lake Tamarisk and interested community members for NEPA scoping meeting; notifies all community members of upcoming on-site surveys

- **Oct:**
  - IP provides emergency port-a-potties to Eagle Mountain School in Desert Center, allowing it to remain open after a plumbing issue
  - Donated pumpkins for the Eagle Mountain School Fall Festival in Desert Center
  - Various phone, email, text conversations with members of Lake Tamarisk (including multiple calls, emails, texts with Mark Carrington and phone discussion with Gary Warner, other emails/texts)
  - Mark Carrington visits Oberon site to discuss soil stabilizers with Todd Casper, IP Construction Manager
  - IP provides courtesy notification of onsite activity
  - IP zoom call with Chuckwalla Valley Raceway to discuss hydrology concerns
- **Nov:**
  - IP sponsors Chiriaco Summit Veterans Day celebration ($2,000 donation)
  - Follow up zoom call with Chuckwalla Valley Raceway to discuss hydrology concerns
  - Various phone, email, text conversations with members of Lake Tamarisk
  - Zoom call with Desert Center Unified School District to discuss School's questions regarding local tax impacts
  - Zoom call with several Desert Center year round residents to discuss community needs
- **Dec:**
  - IP coordinates with Lake Tamarisk Lions Club to donate $2,500 of christmas gifts for local Desert Center children
  - Various phone and email conversations with members of Lake Tamarisk

**2024**

- **Jan:**

- IP provides emergency port-a-potties to Eagle Mountain School in Desert Center, allowing it to remain open after 2nd occurrence of plumbing issue
- IP sends notifications to all Lake Tamarisk and interested community members for Draft EIR Notice of Availability
- IP begins monthly Adopt-a-Highway Trash Clean up on I-10 near Desert Center and on Rice Road ($25,000/yr)
- IP donates $10,000 to the Blythe Chamber of Commerce to cover the cost of 4 new City of Blythe signs
- Email conversation with member of Lake Tamarisk

- **Mar:**
  - $155k donation to Desert Center Unified School District for new school bus, after school/summer programming, and grounds improvements
  - IP provides emergency port-a-potties to Eagle Mountain School in Desert Center, allowing it to remain open after 3nd occurrence of plumbing issue
  - IP donates emergency port-a-potties to Eagle Mountain School in Desert Center to ensure school can stay open if plumbing issues recur
- **Apr:**
  - Intersect Power does a volunteer day at Eagle Mountain School in Desert Center cleaning up school grounds, re-painting and restoring playground and school garden, installing new lunch tables, etc
  -
- **May:**
  - IP donates $40,000 to FIND Food Bank specifically for the Blythe Emergency Food Pantry
  - IP Provides courtesy notification ahead of on site activity
  - IP sends notifications to all Lake Tamarisk and interested community members for Partially Recirculated Draft EIR Notice of Availability
- **Jun:**
  - IP meets with members of Lake Tamarisk and Allen Grant Development over zoom to discuss questions on Easley project
  - IP donates $15,000 to the RUHS Foundation for foster children support programs in Riverside County
  - IP provides courtesy notification ahead of on site activity
- **Jul**
  - In-person meeting with Margit Chiriaco and member of Lake Tamarisk in Chiriaco Summit; IP commits to $50,000 donation to General Patton Memorial Museum and $7,500 sponsorship of Chiriaco Summit Veterans Day celebration
  - In-person meeting & tour at Chuckwalla Valley Raceway with raceway managers to discuss raceway flooding concerns
  - IP does volunteer day for FIND Food Bank in Blythe, handing out food to seniors

  - IP donates $50,000 to the FIND Food Bank specifically for the Set Free Desert Center food Pantry in Desert Center
  - IP provides courtesy notification ahead of on site activity
- **Aug**
  - IP sends notifications to all Lake Tamarisk and interested community members for Publication of Final EIR and Announcement of Public Meeting

# COLORADO RIVER INDIAN TRIBES

*Colorado River Indian Reservation*

26600 MOHAVE ROAD
PARKER, ARIZONA 85344
TELEPHONE (928) 669-9211
FAX (928) 669-1216


August 26, 2024

***Via E-Mail and U.S. Mail***

Riverside County Board of Supervisors
Attn: Clerk of the Board
4080 Lemon Street, 1st Floor
Suite 127
Riverside, CA 92501
Phone: (951) 955-1069
E-Mail: cob@rivco.org

Re: Comments of the Colorado River Indian Tribes re the Final Environment Impact Report for the IP Easley Solar Plant Project (CUP220021)

Dear Supervisors:

On behalf of the Colorado River Indian Tribes (CRIT or the Tribes), I write to provide comments on the Final (FEIR) for the IP Easley Solar Plant Project (Project). After carefully reviewing the FEIR, the Tribes have concluded that it still fails to meet the requirements of the California Environmental Quality Act (CEQA) and other federal, state, and local laws.

As a reminder, the Colorado River Indian Tribes are a federally recognized Indian tribe comprised of over 4,600 members belonging to the Mohave, Chemehuevi, Hopi and Navajo Tribes. The almost 300,000-acre Colorado River Indian Reservation sits astride the Colorado River between Blythe, California and Parker, Arizona. The ancestral homelands of the Tribes' members, however, extend far beyond the Reservation boundaries. Significant portions of public and private lands in California, Arizona, and

Nevada were occupied by the ancestors of the Tribes' Mohave and Chemehuevi members since time immemorial and current Tribe members maintain a strong spiritual connection to these areas. These landscapes remain imbued with substantial spiritual, cultural, and religious significance for the Tribes' current members and future generations. For this reason, we have a strong interest in ensuring that potential cultural resource and other environmental impacts associated with the Project are adequately considered and mitigated.

We have reviewed the FEIR, and submit these comments to ensure that the County's consideration of the Project fully complies with the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 *et seq.* and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 *et seq.* ("CEQA Guidelines"). After reviewing the FEIR, we have concluded that it fails to remedy many of the deficiencies in the Draft Environmental Impact Report ("DEIR") and Partially Recirculated Draft Environmental Impact Report ("RDEIR") for the Project, as set forth in CRIT's March 8, 2024 DEIR comments and July 8, 2024 RDEIR comments.

## I. The Tribes Reiterate Their Previous Concerns, Many of Which Remain Unaddressed.

CRIT identified a number of legal arguments and substantive concerns with the County's analysis in the DEIR and RDEIR, yet many of these issues remain unconsidered or were inadequately addressed in the County's responses to comment. For this reason, the Tribes reincorporate and attach these previous comments, which identify issues such as:

- the failure to adequately consider Tribal input and perspectives in considering whether resources are tribal cultural resources under CEQA. (*See* Pub. Res. Code § 21074(a)(2));
- a failure to adequately consider the Project's significant cumulative impact to culturally sensitive landscape-scale impacts and contribution to the wholesale degradation of the Chuckwalla Valley beyond visual impacts;
- a failure to adequately identify the Project's potential for significant impacts to previously unknown cultural resources that could be unearthed during Project construction and operation; and
- a failure to provide adequate mitigation for the Project's cultural resource and tribal cultural resource impacts.

As discussed further below, the Project must be revised to include adequate mitigation and to better respond to CRIT's comments.

## II. The Project Lacks Adequate Mitigation for Cultural Resource and Tribal Cultural Resource Impacts.

CRIT appreciates the addition of AMP CULT-1 as a move in the right direction, but has outstanding mitigatory concerns. Specifically, this applicant-proposed mitigation focuses on "all *initial* ground disturbing activity," rather than all ground disturbing activity, as CRIT suggested. The FEIR defends this focus on initial ground disturbing activity with the claim that "[f]ollowing initial ground disturbing activities during project construction, there would be limited additional ground disturbing activities which would occur in areas previously impacted by construction. Thus, additional monitoring during operations is not required." (FEIR at DD-1447.)

The Tribes strongly disagree with this assertion. In CRIT's extensive experience monitoring utility-scale renewable energy project construction, changes in project site topography caused by weather events (e.g., flooding caused by monsoon rains, wind storms, etc.) can and often do unearth additional cultural resources even after an area has been initially disturbed. For this reason, it is important to have Tribal monitors present for *all* ground disturbing activity throughout the duration of project construction and periodically thereafter as surface conditions change.

CRIT also objects to the County's continuing refusal to acknowledge the significance of the Project's potential to unearth unanticipated cultural resources and to develop a discovery plan to create protocols and procedures to address the inevitable situation in which Project construction unearths a previously unknown cultural resource. Development of these types of monitoring and discovery plans are standard procedure for solar energy projects. Even if a public agency cannot completely eliminate significant impacts, CEQA requires that it nonetheless must reduce them to the extent feasible. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 524-25 ("Even when a project's benefits outweigh its unmitigated effects, agencies are still required to implement all mitigation measures unless those measures are truly infeasible.").

Finally, CRIT strongly urges the County to revise all cultural and tribal cultural resource mitigation measures to make explicit that the County will consult, notify, and work with *culturally-affiliated* Tribes in mitigating Project impacts.

## III. The County Fails to Adequately Respond to Comments.

In an FEIR, a lead agency must respond to all comments made on the DEIR. Pub. Res. Code § 21091(d); Guidelines §§ 15088(a), 15132. When a comment objects to the DEIR's analysis and raises significant environmental issues, the FEIR's response must give a reasoned, good-faith analysis and "describe the disposition of significant environmental issues raised," such as how revisions to the project will mitigate

anticipated impacts. Guidelines § 15088(c). Comments must be "addressed in detail giving reasons why specific comments and suggestions were not accepted." *Id.*

Detailed responses are required to "ensure that the lead agency will fully consider the environmental consequences of a decision before it is made." *City of Long Beach v. Los Angeles Unified Sch. Dist.* (2009) 176 Cal.App.4th 889, 904. The level of detail necessary "depends on factors such as the significance of the issues raised, the level of detail of the proposed project, the level of detail of the comment, and the extent to which the matter is already addressed in the DEIR or responses to other comments." *Id.* at 901. Generally, the level of detail in the response must match the level of detail in the comment. *Pfeiffer v. City of Sunnyvale* (2011) 200 Cal.App.4th 1552, 1568. Courts have especially emphasized the necessity of reasoned, detailed comments where qualified experts have raised concerns about the DEIR. *See, e.g., Berkeley Keep Jets Over the Bay Committee v. Bd. of Port Comm'rs* (2001) 91 Cal.App.4th 1344, 1371. "Conclusory statements unsupported by factual information" are never an adequate response. Guidelines § 15088(c); *City of Maywood v. Los Angeles Unified Sch. Dist.* (2012) 208 Cal.App.4th 362, 391.

In numerous instances, the FEIR's response to comments fails to meet these requirements. Most of the County's responses to CRIT's comments on the DEIR simply point to revisions in the Cultural and Tribal Cultural Resource sections of the partially recirculated DEIR, but the edits made to the RDEIR simply incorporate BLM's cultural resource information and fail to address the substance of the Tribes' concerns. For example, the County's edits to the RDEIR did not make any changes to the way it analyzed cultural and tribal cultural resources; its consideration of landscape scale resources; or its significance conclusions. Cursory responses that simply point to the RDEIR fail to adequately respond to the Tribes comments and fail to satisfy CEQA.

## IV. CRIT Incorporates Other Legal Arguments By Reference.

Finally, the Tribes incorporate by reference other legal arguments consistent with CRIT's position that have not been adequately addressed in the FEIR, including arguments made by Center for Biological Diversity, California Native Plant Society, Morongo Basin Conservation Association, Desert Tortoise Council, Basin and Range Watch, Sierra Club, and Active Communities/Desert Center.

## V. Conclusion

To ensure that the public and the Board of Supervisors have adequate information to consider the effects of the proposed Project and to comply with the law, the County must prepare and recirculate a revised EIR that properly describes the Project, analyzes its impacts, and considers meaningful alternatives and mitigation measures that would help ameliorate those impacts.

Thank you for your consideration. To understand how these comments were taken into account in your decisionmaking, we ask for a written response prior to a final decision. Please copy the Tribes' Attorney General Rebecca A. Loudbear, at rebecca.loudbear@crit-nsn.gov, and THPO Director Bryan Etsitty, at betsitty@crit-nsn.gov, on all correspondence to the Tribes.

Respectfully,

COLORADO RIVER INDIAN TRIBES

ACTING

Amelia Flores
Chairwoman

Cc: Tribal Council of the Colorado River Indian Tribes
Bryan Etsitty, THPO Director, Colorado River Indian Tribes
Rebecca A. Loudbear, Attorney General, Colorado River Indian Tribes

Enc: CRIT's March 11, 2024 Comments on the Easley Draft Environmental Impact Report
CRIT's July 8, 2024 Comments on the Easley Partially Recirculated Draft Environmental Impact Report

1819824.1

# COLORADO RIVER INDIAN TRIBES

*Colorado River Indian Reservation*

26600 MOHAVE ROAD
PARKER, ARIZONA 85344
TELEPHONE (928) 669-9211
FAX (928) 669-1216


July 8, 2024

***Via E-Mail and U.S. Mail***

Riverside County Planning Department
Attn: Tim Wheeler, Project Planner
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502
E-Mail: TWheeler@rivco.org

Re: Comments of the Colorado River Indian Tribes re the Partially Recirculated Draft Environment Impact Report for the IP Easley Solar Plant Project (CUP220021)

Dear Mr. Wheeler:

On behalf of the Colorado River Indian Tribes (CRIT or the Tribes), I write to provide comments on the partially Recirculated Draft Environmental Impact Report (RDEIR) for the IP Easley Solar Plant Project (Project). After carefully reviewing the partially RDEIR, the Tribes have concluded that it still fails to meet the requirements of the California Environmental Quality Act (CEQA) and other federal, state, and local laws.

As a reminder, the Colorado River Indian Tribes are a federally recognized Indian tribe comprised of over 4,600 members belonging to the Mohave, Chemehuevi, Hopi and Navajo Tribes. The almost 300,000-acre Colorado River Indian Reservation sits astride the Colorado River between Blythe, California and Parker, Arizona. The ancestral homelands of the Tribes' members, however, extend far beyond the Reservation boundaries. Significant portions of public and private lands in California, Arizona, and Nevada were occupied by the ancestors of the Tribes' Mohave and Chemehuevi members since time immemorial and current Tribe members maintain a strong spiritual connection to these areas. These landscapes remain imbued with substantial spiritual, cultural, and religious significance for the Tribes' current members and future generations. For this reason, we have a strong interest in ensuring that potential cultural resource and other

environmental impacts associated with the Project are adequately considered and mitigated.

CRIT previously submitted comments on the DEIR for the Project. After reviewing the recirculated draft, the Tribes have the following additional comments:

- The Tribes note that most of the revisions to the Cultural Resource and Tribal Cultural Resource discussion come from the results of a Class III survey dated from April 2023. The comment period for the initial Draft Environmental Impact Report ended in early March 2024, nearly a year after the Class III survey was completed. Yet, the RDEIR gives no explanation as to why the information from that Class III survey was not included in the initial draft environmental document. CRIT strongly opposes the public issuance of an environmental analysis before the requisite cultural and tribal cultural resource surveying can be fully completed, analyzed, and consulted upon. The County should provide an explanation for this oversight. The Class III survey report was also never provided to CRIT, depriving the Tribes of an opportunity to review and provide input. The Tribes request that the County provide them with a copy of this report at its earliest convenience.

- CRIT appreciates the need to consider a full range of alternatives under the National Environmental Policy Act (NEPA), but cautions against any alternatives that would place even more culturally sensitive areas at risk. Impacts to tribal cultural and environmental resources should be avoided to the greatest extent possible. This goal should be paramount in any alternatives analysis.

- The Tribes also have concerns about many of the newly listed prehistoric resources and isolates. According to the County's analysis, most of these resources fall on the BLM-controlled portion of the Project site and all were found not-eligible for the National Register of Historic Places (NRHP). Yet, many of the descriptions of these resources and their treatment are deeply troubling. For instance:

    - P-33-015089 is initially described as a multicomponent site with five prehistoric ceramic sherds from a single brownware vessel (likely a pot drop). Yet, the RDEIR notes that this site has been significantly disturbed by the access road for the Oberon Solar Project, concluding that "the site no longer contains any association with the PTNCL, as its prehistoric components have disappeared." (RDEIR 3.6-26). The RDEIR analysis gives no explanation as to *why* or *how* these sherds disappeared, so it is not clear if they have been destroyed during Oberon construction, stolen by a third party, collected by an agency, or buried/disturbed through natural flooding or other weather events. If these resources were subject to theft or destruction, this serves to heighten the Tribes' long-held belief that large-

scale solar developments are harmful to cultural resources and impacts from solar projects can only be mitigated through avoidance.

- A number of prehistoric sites (P-22-018268, 19-387-KH-016) appear to have been collected by BLM since the April 2023 cultural resource survey. It is not clear from the RDEIR if these non-NRHP resources were collected to facilitate their reburial at a different location that would remain undisturbed by construction of Oberon or this Project, or if these resources were collected as part of data recovery for curation in a museum. It is CRIT's understanding that BLM generally does not pursue data recovery for resources it does not consider eligible for the NRHP. If these resources were collected for curation, the Tribes reiterate our opposition to data recovery as a practice and strongly encourage the agencies to focus on avoidance and Tribally-supported reburial.

- CRIT also has serious objections to the RDEIR's methodology in considering impacts to the Prehistoric Trails Network Cultural Landscape (PTNCL). The RDEIR notes that many of the newly listed resources have been destroyed through construction of Oberon or other neighboring projects and, therefore, "cannot clearly convey significance as a PTNCL-associated resource" (e.g., P-33-015089, P-33-018268, P-33-018269, 19-387-KH-016). Yet, the RDEIR acknowledges that some of these resources and sites were previously found to be contributors to the PTNCL's eligibility under the California Register of Historic Resources (CRHR) for other nearby sites like Oberon (e.g., P-33-018268, 19-387-KH-016). If agencies are allowed to collect and/or destroy cultural resources with each solar project, the record to establish the breadth of the Tribes' cultural resources, landscape, and footprint on this ancestral area will be eroded with each subsequent project. In other words, most of these sites and resources would still be in place to help convey the significance of the PTNCL *but for construction of other solar projects*. Yet, the RDEIR fails to take this into account when it considers the Project's impacts to the PTNCL. At the very least, this cumulative erosion of CRIT's ancestral footprint and its traditional cultural landscapes should be considered a significant cumulative impact. Yet, the RDEIR blithely concludes that the Project's mitigation measures will be sufficient to ensure that most of its cumulative impacts are less than significant. RDEIR at 3.6-50. There is no evidence to support this conclusion. On the contrary, the record shows that even with mitigation, solar projects like Oberon and the project under consideration here significantly contribute to the cumulative erasure of cultural resources and landscapes. The RDEIR's analysis should be revised to acknowledge this significant impact.

- The RDEIR fails to recognize the fully scale and scope of the sacred landscape in and surrounding the proposed Project site. This mountains near this proposed Project, as well as numerous others within the Chuckwalla Valley, are all connected to Mule Mountain. Mule Mountain is an extremely sacred location to the Mohave people, the place from which Creator would bless their warriors before battle. All the surrounding mountains have relationships to this sacred place as a sacred tribal landscape. To better understand this connection, it is instructive to consider the ceramic pottery sherds collected at many of the nearby project sites. CRIT has never received a final resource inventory for most of these projects, but based on the Tribes' internal records from our tribal monitoring, we provide the following numbers:

    - Lycan Project: 129 ceramic pottery sherds and counting (survey work has just started at this site)
    - Desert Quartzite: 489 ceramic pottery sherds
    - Oberon: 219 ceramic pottery sherds
    - Arica/Victory Pass: 124 ceramic pottery sherds

    Given the proximity of these projects to one another within the Chuckwalla Valley, these sherds must be viewed not as "isolates," but as evidence of the Mohave village sites that were located throughout this landscape. Mohave people were the original people to make ceramic pottery, evidencing the connection of the Tribes' members' ancestors to this sacred landscape. Yet, the RDEIR fails to acknowledge these global impacts, let alone provide mitigation for harms to these sacred landscapes and village sites. Indeed, the fragmented approach to cultural resource inventorying and study—taken by both state and federal agencies—has all but obscured this bigger picture impact. The RDEIR's analysis should be revised accordingly.

- CRIT also notes that the number of known prehistoric isolates on the Project site has been updated from four to 10. This furthers the Tribes concerns that approval and construction of the Project will unearth additional, previously unrecorded cultural and tribal cultural resources. As noted above, this has been the case for many of the nearby solar projects, resulting in greater cultural resource harms than anticipated during their environmental review. CRIT has every reason to believe that a significant number of previously unknown cultural resources will be unearthed with this Project as well.

- The Tribes also take issue with the RDEIR's response to the extent of CRIT's members' ancestral territories. The RDEIR appears to refute this, insisting that "temporal association [of the Chuckwalla Mountains has been] difficult to establish beyond Holocene occupations." RDEIR at 3.6-43. The Tribes are all too aware of the limitations of Western science when it comes to understanding the ancestral history of this area, which the Tribes' ancestors have visited and occupied since time immemorial. As descendants, CRIT's members have invaluable knowledge of our history that extends well beyond what is taught in a university classroom. The County should give proper weight and respect to this Tribal input. *See, e.g.,* "Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA," Governor's Office of Planning and Research at 5 (encouraging agencies to consider "elder testimony, oral history, tribal government archival information, testimony of a qualified archaeologist certified by the relevant tribe, testimony of an expert certified by the tribal government, official tribal government declarations or resolutions, formal statements from a certified Tribal Historic Preservation Officer, or historical/anthropological records.").

- A number of the RDEIR's significance conclusions are unsupported. For instance:

  - The RDEIR incorrectly concludes that the removal of sites and isolates would not alter the PTNCL's ability to convey its historical significance and would not constitute an adverse impact to the PTNCL. RDEIR at 3.6-47. But, as described above, the constant destruction of isolates and sites—even those not individually eligible for the NRHP—causes a significant cumulative impact on the PTNCL and the recognition it receives for the next project that comes along. Yet, the only cumulative cultural resource impact the RDEIR discusses is visual. RDEIR at 3.6-51. The analysis must be revised to correct this error.

  - Similarly, the RDEIR incorrectly concludes that the Project's cumulative cultural resource impacts will be less than significant with mitigation. RDEIR at 3.6-51. For the reasons discussed above, avoidance offers the only true mitigation. CRIT's experiences with past solar projects have highlighted the fact even where a project includes mitigation, it will still disturb, alter, and often harm sacred cultural resources. The RDEIR frequent reference to sites that have been damaged or destroyed during the Oberon construction underscores this point.

  - The RDEIR concludes that the Project will have no impacts to a tribal cultural resource. RDEIR at 3.6-49. Because the Class III survey report was not provided to CRIT, the Tribes had no opportunity to review and provide input as to whether the resources included in the report should also be considered Tribal Cultural Resources under CEQA. The County should provide this document for CRIT's review and revise the RDEIR

accordingly if the Tribes inform the County of any Tribal Cultural Resources on the Project Site or area of indirect impacts.

- The RDEIR should be revised to define a "Native American Monitor" as an individual who acts as a representative of a tribal government for one of the *culturally-affiliated* Tribes for the Easley Project and who has received specialized training approved by that tribal government to serve as a monitor." RDEIR at 3.6-50.

- CRIT appreciates that some of its suggestions regarding mitigation measures have been incorporated into the County's proposed mitigation, but has a number of outstanding concerns about the adequacy of these mitigation measures, some of which are repeated from CRIT's DEIR comments. In addition to the need for mitigation emphasizing avoidance and project redesign, CRIT urges the County to make the following revisions to its mitigation measures:

    - Add a mitigation measure to make clear that the Project Archaeologist shall consult extensively with culturally affiliated tribes to develop a Post-Review Discovery and Unanticipated Effects Plan. This Plan must include a robust tribal monitoring component that allows affected Tribes—like CRIT—to provide tribal monitors for all ground disturbing activities, and must be fully approved by consulting tribes and the County prior to any ground disturbing activities. This is standard protocol for large-scale solar projects. The fact that the DEIR's mitigation does not currently require development of a unanticipated effects and treatment plan reflects the gross inadequacy of the DEIR's archaeological and tribal cultural resource consideration. (*See* MM CUL-1)

    - Revise MM CUL-1 to state that the Project Archaeologist will consult with culturally affiliated tribal groups in developing a Cultural Resource Monitoring Program. As part of this consultation, the culturally affiliated tribal groups shall have an opportunity to review and comment on a draft of the Cultural Resource Monitoring Plan. (*See* MM CUL-1)

    - Revise MM CUL-1, MM CUL-3, and MM TCR-1 to state that *no* ground disturbing activities will take place without the physical presence of a tribal monitor at the location of the ground disturbing work throughout the entirety of the Project, not just initial activities. Written notice identifying the proposed schedule of each project phase shall be provided to the Tribe supplying the tribal monitors at least one week in advance. Weekly, until ground disturbance is completed, the project construction manager shall provide to the tribal monitors' manager a schedule of project activities for the following week, including the identification of area(s) where ground disturbance will occur during that week. The Project Owner shall notify the

Tribe providing tribal monitors of any changes to the scheduling of the construction phases.

- Revise MM CUL-4 to state that a tribal monitor shall also be called immediately upon discovery of a cultural resource if a tribal monitor is not already present. MM CUL-4 should also be revised to require the developer to immediately alert culturally affiliated tribes in the event of an unanticipated discovery.

- Revise MM CUL-4 to prohibit the CRS from decreasing the tribal monitoring effort.

- Revise MM CUL-4 to better define "Native American tribal representative."

- Revise MM CUL-4 to make clear that, upon the temporary halting of ground disturbing activities to evaluate a newly discovered cultural resource, the Colorado River Indian Tribes shall be consulted regarding the proper treatment of the resource in question.

- Revise MM CUL-6 to state that any reports prepared shall also be provided to CRIT and other culturally affiliated tribes.

- Revise MM CUL-8 to clarify how CRIT and other culturally affiliated tribes will be notified of the opportunity to be involved in the planning process.

- Revise MM TCR-1 to clearly define the term "Native American Monitor."

- Revise MM TCR-2 to provide that any fully executed reburial agreement will also provide conditions for the protection and confidentiality of the reburial site. These conditions, along with the other parameters governing reburial, shall be chosen in consultation between the culturally affiliated tribe, the County, and the developer.

- Revise the biological resources mitigation measures to provide that a copy of all biological resource mitigation monitoring reports shall be provided to CRIT. The Tribes are concerned that a number of the mitigation measures that agencies permitting solar development have been proposing for sensitive desert flora and fauna are not actually effective in mitigating harms.

Thank you for your consideration. To understand how these comments were taken into account in your decisionmaking, we ask for a written response prior to a final

decision. Please copy the Tribes' Attorney General Rebecca A. Loudbear, at rebecca.loudbear@crit-nsn.gov, and THPO Director Bryan Etsitty, at betsitty@crit-nsn.gov, on all correspondence to the Tribes.

Respectfully,

COLORADO RIVER INDIAN TRIBES

Amelia Flores
Chairwoman

Cc: Tribal Council of the Colorado River Indian Tribes
Bryan Etsitty, THPO Director, Colorado River Indian Tribes
Rebecca A. Loudbear, Attorney General, Colorado River Indian Tribes

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# COLORADO RIVER INDIAN TRIBES

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March 11, 2024

***Via E-Mail and U.S. Mail***

Riverside County Planning Department
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P.O. Box 1409
Riverside, CA 92502
E-Mail: TWheeler@rivco.org

Re: Comments of the Colorado River Indian Tribes re the Draft Environment Impact Report for the IP Easley Solar Plant Project (CUP220021)

Dear Mr. Wheeler:

On behalf of the Colorado River Indian Tribes (CRIT or the Tribes), I write to provide comments on the Draft Environmental Impact Report (DEIR) for the IP Easley Solar Plant Project (Project). After carefully reviewing the DEIR, the Tribes have concluded that it fails in many respects to meet the requirements of the California Environmental Quality Act (CEQA) and other federal, state, and local laws.

As a preliminary matter, the Colorado River Indian Tribes are a federally recognized Indian tribe comprised of over 4,440 members belonging to the Mohave, Chemehuevi, Hopi and Navajo Tribes. The almost 300,000-acre Colorado River Indian Reservation sits astride the Colorado River between Blythe, California and Parker, Arizona. The ancestral homelands of the Tribes' members, however, extend far beyond the Reservation boundaries. Significant portions of public and private lands in California, Arizona, and Nevada were occupied by the ancestors of the Tribes' Mohave and Chemehuevi members since time immemorial. These landscapes remain imbued with

substantial cultural, spiritual, and religious significance for the Tribes' current members and future generations. For this reason, we have a strong interest in ensuring that potential cultural resource and other environmental impacts associated with the Project are adequately considered and mitigated.

In particular, the Tribes are concerned about the potential removal of cultural belongings from this area and the corresponding destruction of the Tribes' footprint on this landscape. For this reason, the Tribes request that all prehistoric cultural resources, including both known and yet-to-be-discovered sites, be avoided if feasible. The Tribes likewise urge Riverside County (County) to complete ethnographic studies and archaeological surveys of roads proposed for travel and transportation in order to best understand if some roads require closure or limit access to protect prehistoric resources. CRIT tribal monitors should be used to complete this work.

**The DEIR Is Inadequate under CEQA.**

The EIR is "the heart of CEQA." *Laurel Heights Improvement Ass'n v. Regents of University of California*, 47 Cal.3d 376, 392 (1988) (citations omitted). It is "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return. The EIR is also intended 'to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.' Because the EIR must be certified or rejected by public officials, it is a document of accountability." *Id.* (citations omitted).

Beyond merely disclosing potential environmental impacts, the environmental review statutes require agencies to develop tactics to address them. Specifically, CEQA not only requires the County to identify a project's significant effects, but also requires the agency to adopt measures to avoid or minimize them. Pub. Res. Code § 21002.1. An EIR may not defer evaluation of mitigation to a later date. CEQA Guidelines[1] § 15126.4(a)(1)(B). Where, as here, the environmental review document fails to fully and accurately inform decisionmakers and the public of the environmental consequences of proposed actions, or identify ways to mitigate or avoid those impacts, it does not satisfy CEQA's basic goals. *See* Pub. Res. Code § 21061 ("The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect that a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to

[1] The CEQA Guidelines can be found at Cal. Code Regs., tit. 14, § 15000 et seq.

indicate alternatives to such a project."). As a result of the DEIR's numerous and serious inadequacies, there can be no meaningful review of the Project by either the public or the agencies' decisionmakers.

## I. The DEIR Fails to Adequately Analyze or Mitigate the Project's Impacts on Cultural Resources.

The proposed Project analyzed in the DEIR is a 400 megawatts (MW) solar PV project with up to 650 MW battery energy storage and appurtenant facilities. The project also includes a 6.7 mile 500 kilovolt (kV) generation-tie line that would mainly traverse across the Oberon Renewable Energy Project site and connecting to an existing substation there. (Easley Renewable Energy Project Draft Environmental Impact Report (DEIR) at ES-1.) CRIT is traditionally and culturally affiliated with the Project area and the ancestors of CRIT's Mohave and Chemehuevi members have lived and traveled in the Project area since time immemorial.

The DEIR identifies prehistoric resources in both the CEQA Area of Direct Impacts and Area of Indirect Impacts. (DEIR at 3.5-17 to -23.) Among others, these identified Prehistoric Trails Network Cultural Landscape and prehistoric isolates play an integral role in Mohave cultural and spiritual beliefs, in addition to the plants and animals of the area. The surrounding landscape of the Chuckwalla Mountains and Palen Mountains is identified in Mohave songs and stories. (DEIR at 3.5-14.) Yet, despite this, the DEIR fails to acknowledge the Project's potentially significant impacts on historical resources and Tribal Cultural Resources. (DEIR at 33.6-29, -32.)

CRIT must voice its opposition to the development of the Project in any form on this sensitive landscape. As this letter describes further below, the Tribes are seriously troubled by the Project's potential to remove, damage, or destroy cultural resources and artifacts—especially those that have not previously been unearthed. These resources are sacred and finite, and together make up the cultural footprint of the Tribes' ancestors. According to the belief system of CRIT's Mohave members, the disturbance of any cultural resources affiliated with their ancestors is taboo, and thus considered a severe cultural harm. CRIT therefore cannot support any project that will likely result in the disturbance or destruction of cultural resources and artifacts.

Moreover, despite the DEIR's attempt to downplay the possibility of unanticipated cultural resource discoveries, CRIT has every reason to fear that cultural resource impacts will be worse than the analysis predicts. As the DEIR acknowledges, the Project is located in a region of significant prehistoric human activity. (DEIR at 3.6-1 ("Many

cultural resources are present in the region surrounding the proposed Project area, both on the ground surface and buried completely or partially beneath it, which could be affected by development without adequate protections in place."); DEIR at Appx. D, p. 10 ("The low energy of deposition in the area suggests a moderate to high degree of potential preservation of buried sites outside channel settings.").) This is a high stakes location for cultural resource discoveries. Significant cultural harm will occur if resources are indeed discovered and disturbed. CRIT has seen that pattern play out all too often with projects like the nearby Genesis Solar Project, in which almost 3,000 cultural belongings are now permanently stored in a museum hundreds of miles away, where CRIT's members are not allowed to view them.

Moreover, much of the traditional value of these cultural resources to the Tribes comes from maintaining the connectivity between cultural resource sites stretching south from Spirit Mountain in Nevada. The Chuckwalla Valley plays a key role in maintaining this connectivity within Tribal members' ancestral landscape. Landscapes reflect human activity and are imbued with cultural values. They combine elements of space and time, and represent political, as well as social and cultural, constructs. These traditional cultural properties and landscapes can include viewsheds, features, plans and animals used in and/or central to cultural and religious practices and creations stories, and religious and customary practices (e.g., hunting and gathering, religious ceremonies and trails, which were used by Mohave Runners to deliver messages to the numerous Mohave villages scattered in the area about deaths within the community or upcoming battles with other tribes).

### A. The DEIR incorrectly considers cultural resource value only from a Western, scientific perspective.

The DEIR's methodology for its impact analysis fails to adequately incorporate tribal perspectives and input. Here, the focus on Western scientific "value" artificially constrains its consideration of "cultural resources," and thereby undermines the accuracy and quality of any subsequent analysis and the DEIR's compliance with AB 52 and CEQA. In focusing solely on the eligibility of cultural resources for the California Register of Historical Resources, the DEIR ignores the tremendous cultural and spiritual significance that these cultural resources have for Tribal members—and their appropriate classification as Tribal Cultural Resources under CEQA. (*See* Pub. Res. Code § 21074(a)(2).)

The Mohave People believe that their ancestors—who lived, traveled, prayed, fought, and died on this landscape since time immemorial—left their possessions and

belongings in the land to forever memorialize their connection to it. These possessions and belongings—which may include tools, pottery, habitation sites, intaglios, petroglyphs, rock circles, sleeping circles, and trails—form a "footprint" that serves as tangible proof of the Mohave People's ongoing connection to their ancestral territory. The disturbance of these belongings is strictly taboo in the Mohave belief system. The DEIR's sole focus on archaeological and data-driven characterizations of cultural resources ignores the fact that removal and/or destruction of any cultural resources—including those characterized as "isolates"—has a significant and devastating impact on the Tribes. It also violates CEQA, which acknowledges that Tribal Cultural Resources are an independent category of resources that must be thoroughly studied, analyzed, and mitigated.

### 1. The Project will significantly impact prehistoric cultural landscapes.

Both state and federal law recognize that cultural resources include cultural landscapes. *See* National Register Bulletin, "Guidelines for Evaluating and Documenting Traditional Cultural Properties" ("A culturally significant natural landscape may be classified as a site" eligible for the National Register); Pub. Res. Code § 21074(a) (tribal cultural resources include "cultural landscapes"). Indeed, evaluation and protection of such landscapes is necessary to ensure adequate protection of both individual resources and their historic context. The California Office of Historic Preservation has explicitly recognized the need for cultural resource professionals working on renewable energy projects to shift focus from a site level to the landscape level of assessment.[2] While the DEIR recognizes that cultural landscapes may be protected under state law, the DEIR fails to adequately consider the Project's impact on the identified Prehistoric Trails Network Cultural Landscape (PTNCL).

The DEIR acknowledges that the Prehistoric Trails Network Cultural Landscape "encompasses the entirety of the Project area." (DEIS at 3.6-24.) The PTNCL consists of "prehistoric resources and landforms associated with the Halchidoma (or Coco-Maricopa) Trail," extending "near Blythe at the Colorado River, continuing to the west through the Chuckwalla Valley toward modern Los Angeles." (*Id.*) The DEIR then states that the PTNCL "was previously determined eligible for listing on the CRHR under

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[2] See Sustainable Preservation: California's Statewide Historic Preservation Plan, 2013-2017 (at page 16), available at: http://ohp.parks.ca.gov/pages/1069/files/SustainablePreservation_CaliforniaStatePlan_2013to2017.pdf.

Criteria 1 and 4," but asserts that "[n]o cultural remains associated with the PTNCL have been documented in the Project's Cultural Resources Study Area." (*Id.*)

Yet, this rigid focus on PTNCL "cultural remains" ignores the overarching connectivity and the interrelated nature of a landscape-level trail system. Even without identifying a specific PTNCL "site type" in the Project area, the identification of the cultural landscape itself—which the DEIR admits encompasses the entire Project area—signifies that building within that landscape will have a significant, disruptive impact. (*See, e.g.,* Palen Solar Electric Generating System Revised Presiding Member's Proposed Decision (PMPD) at 6.3-34 to -51 (identifying the Prehistoric Trails Network Cultural Landscape (PTNCL) and the larger Pacific to Rio Grande Trails Landscape (PRGTL) ("Staff identifies the Chuckwalla Valley portion of the PRGTL as a cultural landscape and historical resource under CEQA that has both archaeological and ethnographic contributing elements…The Chuckwalla Valley portion of the PRGTL is ultimately the result of the dynamic interaction between the natural elements of the landscape and the movement of different Native American cultures that lived and passed through the region").) The cultural landscape is the Tribes' way of life. The trails, which pass through the site, link the petroglyphs and rock shelters found on each surrounding mountain. The ancestors who created the petroglyphs in the boulders each had ties to the area and reasons for doing so and the entire landscape remains important to each tribal member individually and the Tribes collectively.

Project by project, the Tribes' cultural footprint is being erased and this Project is no exception. The DEIR's failure to acknowledge the Project's significant impact on the PTNCL as a while violates CEQA. The analysis must be revised to properly account for and mitigate these impacts.

**2. As the prehistoric resources destroyed by the project contribute to cultural landscapes, their removal constitutes a significant impact.**

The California Environmental Quality Act ("CEQA") requires lead agencies to identify significant impacts to "historic resources" and mitigate these impacts. *See, e.g.*, CEQA Guidelines § 15064.5. Moreover, CEQA requires lead agencies to use preservation in place for archaeological resources if feasible, unless other mitigation would be more protective. (CEQA Guidelines § 15126.4(b); *Madera Oversight Coal. v. County of Madera*, 199 Cal.App.4th 48, 82-87 (2011).)

The DEIR explains that there are 25 documented cultural resources in the CEQA Area of Direct impacts, including four archaeological sites, two built-environment resources, two districts, and 17 isolates. (DEIR at 3.6-20). The non-isolate prehistoric archaeological resources include the Prehistoric Trails Network Cultural Landscape (PTNCL). (DEIR at 3.5-20). All of the 17 isolates are not considered eligible for the CRHR, thus the DEIR did not consider them any further. (DEIR. at 3.6-19 to -20.)

The DEIR's focus only on "eligible" resources misconstrues state law. The DEIR must avoid conflating eligibility for the CRHR with significant impacts analysis under CEQA. Impacts to archaeological resources considered non-eligible for listing on the CRHR—perhaps because of their lack of integrity—may nevertheless be significant for CEQA purposes.

The DEIR's focus on Western scientific "value" artificially constrains its consideration of "cultural resources," and thereby undermines the accuracy and quality of any subsequent analysis. In doing so, the EIR ignores the tremendous cultural and spiritual significance that these cultural resources have for Tribal members, regardless of CRHR eligibility. The Mohave People believe that their ancestors—who lived, traveled, prayed, fought, and died on this landscape since time immemorial—left their possessions and belongings in the land to forever memorialize their connection to it. These possessions and belongings—which may include tools, pottery, habitation sites, intaglios, petroglyphs, rock circles, sleeping circles, and trails—form a "footprint" that serves as tangible proof of the Mohave People's ongoing connection to their ancestral territory. The disturbance of these belongings is strictly taboo in the Mohave belief system. The DEIR's sole focus on archaeological and data-driven characterizations of cultural resources ignores the fact that removal and/or destruction of any cultural resources—including those characterized as "isolates"—has a significant and devastating impact on the Tribes.

Additionally, the DEIR's analysis inappropriately silos these archaeological resources. Under its logic, if an individual resource is not *independently* significant, it does not merit protection. In ignoring the connective and cumulative value of these resources, the DEIR fails to evaluate whether any of these non-eligible prehistoric archaeological sites or isolates contribute to the cultural landscapes discussed in the prior section. Even if these resources are not significant on their own—a characterization that the Tribes do not support—the DEIR must be revised to evaluate whether these resources are significant because of their contribution to a broader cultural landscape.

### B. The DEIR's analysis fails to consider the Project's potentially significant impact on buried cultural and tribal cultural resources.

The DEIR pays scant attention to the very real possibility that construction and maintenance of this proposed Project will unearth archaeological and tribal cultural resources. Though DEIR acknowledges the possibility of unearthing archaeological and tribal cultural resources during construction, operation, and decommissioning of the Project (DEIR at 3.6-32, -30), it claims that the potential impacts would be mitigated to a less than significant level through the DEIR's proposed mitigation measures. This analysis fails to recognize the tremendous cultural harm that the Tribes experience whenever tribal cultural resources are unearthed, damaged, or removed from the Tribal members' ancestral footprint.

The only true mitigation for cultural resource harms is avoidance—something that none of the DEIR's mitigation measures fully embrace. Moreover, the DEIR's emphasis on protecting only CRHR-eligible resources ensures that even avoidance may do nothing to prevent the wholesale destruction and/or removal of countless cultural resources on the Project site. These isolates and non-eligible resources make up the cultural footprint of many Tribal members' ancestors. Unless the definition of protected resources extends to these cultural resources as well, it is very likely that destruction of cultural resources will continue.

For this reason, CRIT strongly urges the County to adopt a mitigation measure emphasizing avoidance and preservation in place. Where that is not feasible, the County should allow the Tribes to rebury unearthed tribal cultural resources in another location where they will be out of harm's way from the Project activities. BLM California has recently revised its policies to allow this type of reburial when requested by tribes: https://www.blm.gov/policy/ca-2023-002, and CRIT appreciates the language in MM TCR-2 contemplating a reburial agreement between the developer and culturally affiliated tribe.

### C. The DEIR's analysis of cumulative adverse effects on cultural resources is inadequate.

Cultural resources represent a direct linkage between present-day tribal members and their ancestors. Removal of these resources from the landscape is removal of the Tribes' footprint. Once such resources are gone, it will be difficult, if not impossible, for the Tribes to prove that these lands are part of their ancestral homeland, and that their ancestors lived and worked on these lands since time immemorial.

The DEIR lists 22 past and present projects or programs and 11 probable future projects in the vicinity of the Project. (DEIR at 3.1-8 to 3.1-12.) These projects include 15 large-scale renewable energy projects, 2 electrical substations, and 4 transmission line projects (*Id.*) However, the DEIR provides an inaccurate picture of cultural resource impacts. In particular, the DEIR fails to accurately describe the cumulative impacts of the listed projects in the vicinity. The DEIR should provide information as to how many cultural resources were actually discovered and/or disturbed when those projects were constructed. As the County is aware, it is impossible to predict the location of buried cultural resources and, therefore, actual cultural resource impacts can only be known once project construction has concluded. For the vast majority of the projects the DEIR lists in its cumulative analysis, those final impact numbers are readily available. Yet, the DEIR fails to provide the cultural resource information from each respective project, effectively guaranteeing that cumulative impacts are understated.

Further, the DEIR analysis focuses solely on NRHP- and/or CRHR-eligible resources and ignores non-eligible and isolate discoveries. The DEIR's discussion of only eligible resources ignores the broader cumulative impact of these projects for CRIT's members. The disturbance, destruction, and/or removal of any cultural resource—including isolates and non-eligible artifacts—contributes to the steady erosion of Tribal members' cultural footprint from their ancestral landscape. This issue is especially pressing given the past practice of allowing isolates and noneligible resources to be destroyed on site during construction. The DEIR's methodology fails to acknowledge this devastating impact and provides the public with an inaccurate cumulative picture.

Compounding all of these analytical shortcomings, the DEIR concludes that the Project would not have a significant cumulative impact on archaeological or tribal cultural resources. (DEIR at 3.6-33 to -34.) In making this finding, the DEIR argues that "because the visual changes resulting from the Project would be in kind with the current nature and scale of existing visible developments, the portion of these resources within the indirect impact area would also not be impacted by the Project." (DEIR at 3.6-33.) In other words, the DEIR appears to be asserting that because the area surrounding the Project has already been negatively impacted by solar development, the addition of one more project will not make a significant difference in an already degraded area. Yet, CEQA does not allow agencies to use supposedly substandard environmental conditions to avoid considering a project's impacts to those conditions. (*See Los Angeles Unified School Dist. V. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025-26 (invalidating EIR that failed to analyze project's noise impacts because it was "already beyond the maximum level permitted.")

Further, the Tribes firmly disagree with the County's characterization of this landscape. This ancestral land is still imbued with significance and meaning to Tribal members and any additional harm or infringement on that fragile, invaluable landscape has a significant impact for the Tribes. A more robust cumulative impacts analysis is necessary because "environmental damage often occurs incrementally from a variety of small sources [that] appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact." (*Communities for a Better Env't v. Cal. Res. Agency* (2002) 103 Cal.App.4th 98, 114; CEQA Guidelines § 15355(b) ("Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.").)

### D. The DEIR fails to provide adequate mitigation for the Project's cultural and tribal cultural resource impacts.

The DEIR relies on numerous mitigation measures to purportedly reduce the Project's significant cultural resource impacts (DEIR at XX), yet the proposed mitigation is inadequate and needs a number of revisions to more appropriately incorporate tribal input and respond to the Project's harms. In addition to the need for mitigation emphasizing avoidance and, where that is not possible, reburial, CRIT urges the County to make the following revisions:

- Add a mitigation measure to make clear that the Project Archaeologist shall consult extensively with culturally affiliated tribes to develop a Post-Review Discovery and Unanticipated Effects Plan. This Plan must include a robust tribal monitoring component that allows affected Tribes—like CRIT—to provide tribal monitors for all ground disturbing activities, and must be fully approved by consulting tribes and the County prior to any ground disturbing activities. This is standard protocol for large-scale solar projects. The fact that the DEIR's mitigation does not currently require development of a unanticipated effects and treatment plan reflects the gross inadequacy of the DEIR's archaeological and tribal cultural resource consideration.

- Revise MM CUL-1 to state that the Project Archaeologist will consult with culturally affiliated tribal groups in developing a Cultural Resource Monitoring Program. As part of this consultation, the culturally affiliated tribal groups shall have an opportunity to review and comment on a draft of the Cultural Resource Monitoring Plan.

- Revise MM CUL-1, MM CUL-3, and MM TCR-1 to state that *no* ground disturbing activities will take place without the presence of a tribal monitor at the location of the ground disturbing work. Written notice identifying the proposed schedule of each project phase shall be provided to the Tribe supplying the tribal monitors at least one week in advance. Weekly, until ground disturbance is completed, the project construction manager shall provide to the tribal monitors' manager a schedule of project activities for the following week, including the identification of area(s) where ground disturbance will occur during that week. The Project Owner shall notify the Tribe providing tribal monitors of any changes to the scheduling of the construction phases.

- Revise MM CUL-2 to state that the Project owner shall seek tribal input and participation in compiling its Worker Environmental Awareness Program training to better incorporate tribal knowledge and perspectives.

- Revise MM CUL-4 to state that a tribal monitor shall also be called immediately upon discovery of a cultural resource if a tribal monitor is not already present.

- Revise MM CUL-4 to prohibit the CRS from decreasing the tribal monitoring effort.

- Revise MM CUL-4 to better define "Native American tribal representative."

- Revise MM CUL-4 to make clear that, upon the temporary halting of ground disturbing activities to evaluate a newly discovered cultural resource, the Colorado River Indian Tribes shall be consulted regarding the proper treatment of the resource in question.

- Revise MM CUL-6 to state that any reports prepared shall also be provided to CRIT and other culturally affiliated tribes.

- Revise MM CUL-8 to clarify how CRIT and other culturally affiliated tribes will be notified of the opportunity to be involved in the planning process.

- Revise MM TCR-1 to clearly define the term "Native American Monitor."

- Revise MM TCR-2 to provide that any fully executed reburial agreement will also provide conditions for the protection and confidentiality of the reburial site, which shall be chosen in consultation between the culturally affiliated tribe, the County, and the developer.

## E. The DEIR analysis fails to take a comprehensive view of cultural and tribal cultural resources.

### 1. The DEIR fails to adequately analyze cultural resource impacts from increased erosion.

The DEIR notes that the soils underlying the site present erosion hazards. (DEIR at 2-29 ("The Applicant would recondition roads up to approximately once per year, such as after a heavy storm event that may cause destabilization or erosion.") ("...given the desert environment and sandy soil, an earthen berm would be difficult to stabilize with vegetation, and therefore, could become a source of erosion and sediment.").) Erosion can exacerbate exposure of cultural resources. For example, at the Genesis Solar Energy Project, annual monsoon rains overwhelmed the project's stormwater drainage plans, resulting in significant erosion and exposure of cultural resources. BLM brought in tribes for consultation, asking what should be done to the resources that were exposed. Overwhelmingly, the response was that BLM should have better reviewed the designs of the project in the first place, to ensure that the project did not exacerbate runoff and erosion.

However, the DEIR does not discuss this issue. The analysis must be revised to specifically address whether the Project will result in increased erosion and deposition, including in a manner that would adversely impact cultural resources.

### 2. The DEIR fails to adequately analyze visual cultural resource impacts.

The Aesthetics section of the DEIR does not address the cultural implications of the Project's disruption of the visual landscape. While the DEIR considers impacts to general populations such as motorists, recreational visitors, and residents of the local resort, it fails to consider the Project's visual impact on Tribal members. (DEIR at 3.2-4 to -8, -34 to -35.) Chuckwalla Valley and the surrounding slopes and ridgelines are more than a recreational resource for the Tribes; they have longstanding cultural and spiritual significance as ancestral lands. Any large-scale visual alteration to this space disturbs the sanctity of the outdoor environment, degrades cultural values, and constitutes a significant impact. Despite this special significance, the DEIR does not mention the visual impact on CRIT members in the Aesthetics section. The County must consult with the Tribes to determine the full significance of the visual landscape of the Chuckwalla Valley and surrounding slopes and ridgelines as cultural resources, and to explore

possible additional or alternative mitigation that would best minimize visual impacts as a whole.

Furthermore, the DEIR's failure to analyze the cultural impacts of the Project's aesthetic impacts violates applicable local regulations. The Riverside County General Plan's Land Use element includes Policy LU 9.1, which "[p]rovide[s] for permanent preservation of open space lands that contain important…cultural resources." (DEIR at 3.2-9). However, the Project will span 3,735 acres. (ES-22). Located in the Tribes' ancestral homelands, the Project will directly impact the land and any cultural resources it is sited on. Moreover, the Project's "area of potential visual effect…is extensive and encompasses much of the Chuckwalla Valley and the Project site-facing slopes and ridgelines of the surrounding mountains including areas within Joshua Tree National Park (JTNP)." (DEIR at 3.2-3). The DEIR claims that the Project is nonetheless consistent with Policy LU 9.1 because it is "not within an area with important scenic values." (DEIR at 3.2-27). In describing the Project's visual impacts as measured from Key Observation Points (KOP), the DEIR states that the "vegetation on the Project site and in the Project area appears relatively non-descript and subdued in color." (DEIR 3.2-2.) However, this conclusion ignores the landscape's cultural significance and thus wrongly claims that the Project is consistent with Policy LU 9.1. By focusing on the "scenic" value of the landscape the analysis artificially constrains its consideration of aesthetic impacts. The Project is inconsistent with Policy LU 9.1 because it has a clear effect on the area's cultural resources, disrupting both physical and visual access to the Tribes' ancestral lands.

Because the aesthetics analysis does not consider the cultural significance of the Project's aesthetic impacts, the proposed mitigation measures are inadequate. None of the measures address concerns tied to the landscape's cultural significance. The DEIR must be revised to consider and analyze the cultural significant of the area's landscape.

**a. The Project's cumulative impacts on visual resources are significant.**

Thirty-three past, present, and potential future projects are sited in the area, and this Project will contribute to the adverse cumulative effects of converting "the grand scale of the open desert panoramas impact[ing] an overall general impression of a historically natural-appearing desert landscape" to that "of a developed energy zone characterized by numerous solar energy facilities, either existing or under construction." (DEIR at 3.2-34.) The DEIR recognizes that the Project, in combination with other local energy projects, would contribute to significant cumulative visual impacts, but

nonetheless ignores lower footprint alternatives and continues to recommend the proposed project. (DEIR at 3.2-34.)

### 3. The DEIR ignores the cultural significance of impacted desert species.

The DEIR also fails to acknowledge the cultural significance of these desert species to local tribes—either in the cultural resources analysis or the biological impacts discussion. A number of the animals at greatest risk from the proposed project (Mojave desert tortoise, golden eagles, Western burrowing owls, American badgers, desert kit foxes, and other various birds) are important to tribal culture because they hold power and spiritual value in Native American belief systems and oral traditions. The CEQA Guidelines explain that a historic resource need not be eligible for the CRHR to be a "historic resource" under Public Resources Code sections 5020.1(j) or 5024.1; "historic resources" thus require a more expansive analysis than the one required under the CRHR criteria. CEQA Guidelines § 15064.5(a)(4). Such resources necessarily include viewsheds and landscapes, plants and animals used in and/or central to cultural and religious practices and creation stories, and religious and customary practices (e.g., hunting and gathering, religious ceremonies, and trailwalking). The DEIR must be revised to apply the correct definition of cultural resources for this Project and properly analyze these impacts.

A number of the plants at the project site also hold cultural value for CRIT. For example, the DEIR states that the Project area would cover 1,680.9 acres of Creosote Bush Scrub. (DEIR at 3.5-20.) Creosote has topical and internal medicinal purposes for tribal members, and was traditionally used by Mohave and Chemehuevi craftspeople for a number of utilitarian purposes, including waterproofing of baskets, cordage objects, and pottery. Once these and other desert sensitive plants have been destroyed through surface disturbing activities, this loss of traditional cultural lifeways cannot be readily mitigated.

#### a. The cumulative impacts on biological resources is not adequately analyzed.

Moreover, CRIT has serious concerns that the piecemeal mitigation measures proposed in the DEIR will adequately alleviate the tremendous stress that these large-scale renewable energy projects place on sensitive desert species. Much of the DEIR's analysis of potential biological impacts relies on surveys to determine what species are present in the Project area, yet this methodology does not necessarily capture the extent to which other solar projects in the vicinity have already destroyed habitat and impacted

the future viability of these desert species. For instance, the DEIR repeatedly points to desert tortoise relocation as a means of alleviating impacts to that species, but the Tribes are concerned that the development of so many solar projects in this region has left little habitat available for those relocation efforts. (DEIR at 3.5-39.) Moreover, the DEIR inappropriately defers development of much of that mitigation by stating that tortoise fencing will be determined at a later point. (DEIR at 3.5-36, -54, -58.) CEQA does not allow agencies to defer mitigation to a later date without adequate performance standards, which are not provided here. (CEQA Guidelines § 15126.4(a)(1)(B).) Indeed, without more detail as to how and where desert tortoise exclusion fencing will be used, it is difficult for CRIT and the public to understand whether this tool will adequately mitigate the Project's impacts. (*See Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 520-21 (deferral of mitigation without "objective and measurable standard" or "reasonable assurance" impacts will be reduced is legal error); *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 281 (invalidating mitigation that failed to "specify performance standards or provide other guidelines").) The County must remedy this error.

The DEIR analysis must be revised to consider these devastating cumulative and compounding impacts. Citing to old analysis in the DRECP LUPA Final EIS is not sufficient where so much more is now known about the cumulative biological impacts of solar projects in this area. (DEIR at 3.5-54 to -58.)

## II. The DEIR Fails to Recognize or Analyze the Environmental Justice Impacts of the Project.

California law requires that local agencies consider issues of fairness and environmental justice in the planning context. *See* Cal. Gov. Code, § 11135. "Environmental justice" is defined in the Government Code as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." Cal. Gov. Code, § 65040.12(e). Likewise, CEQA and its implementing Guidelines require lead agencies to consider the public health burdens of a project as they relate to environmental justice for certain communities. A 2012 report from the California Attorney General discussing environmental justice concerns under CEQA explained that, "where a local agency has determined that a project may cause significant impacts to a particular community or sensitive subgroup, the alternative and mitigation analyses should address ways to reduce or eliminate the project's impacts to that community or subgroup." "Environmental Justice at the Local and Regional Level: Legal Background," State of CA DOJ, at 4. There is a similar requirement for BLM under NEPA. *See, e.g.*,

EPA's 1998 Environmental Justice Guidance; Executive Order 12898. These analyses are required for an adequate consideration of environmental justice impacts.

The DEIR fails to include any analysis or mitigation related to the Project's environmental justice impacts. One of the most substantial environmental costs of the proposed Project is the destruction of tangible cultural resources and the wholesale transformation of the ancestral homelands of Indian tribes, including CRIT. This cost is borne exclusively by tribal members. The power produced at the proposed Project, however, is unlikely to serve residents of the Colorado River Indian Reservation, and the climate change benefits will be spread across the globe. The massive profits, moreover, will benefit a small number of private companies. This imbalanced allocation of costs and benefits, which disproportionately disadvantages a minority population while providing them little or no benefit from the program, satisfies any recognized definition of environmental justice.

To begin to right this imbalance, CRIT urges the County to consider and analyze the Project's environmental justice impacts. Furthermore, CRIT urges the County to adopt a mitigation measure to give employment preferences to Tribal members, as well as access to any necessary job training programs to ensure performance and experience requirements can be met. The agencies should also adopt mitigation measures that ensure that the project developer sources construction materials from tribal enterprises. CRIT has serious questions as to whether the proposed Project will bring much needed construction and permanent jobs to an area close to the Reservation. At a minimum, please provide additional information about the nature of the jobs related to the Project to ensure that Tribal members may be available for hire. Tribal members must have access to these jobs to ensure that at least some of the benefits of the proposed Project flow back to the disadvantaged minority community on the Reservation.

## III. The Alternatives Section Is Inadequate.

### A. The Project's narrow purpose impedes an adequate alternatives analysis.

CEQA requires an EIR to include analysis of alternative locations. CEQA Guidelines, § 15126.6(f)(2). The EIR must ask if "any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." CEQA Guidelines, § 15126.6(f)(2). Only if the lead agency concludes that there are no feasible alternatives, may the agency avoid reviewing at least one alternative site. CEQA Guidelines, § 15126.6(f)(2); *see Laurel Heights Improvement Ass'n v. The*

*Regents of the University of California*, 47 Cal. 3d 376, 399-407 (1988) (finding that the EIR should have explored the potential to locate the project somewhere other than the Laurel Heights property; fact that the University owned the Laurel Heights property did not exempt it from analyzing use of other sites). And, if the agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion in the EIR. CEQA Guidelines, § 15126.6(f)(2).

The DEIR does not disclose that no feasible alternative locations exist, nor does it give any reasons for its failure to consider a feasible off-site alternative. (ES-8 to ES-9). This flatly contradicts the CEQA Guidelines and case law.

## IV. The DEIR Improperly Narrows the Analysis of Growth-Inducing Impacts from the Project.

A draft EIR must discuss the ways in which the proposed project could foster growth-inducing impacts. Pub. Resources Code § 21100(b)(5); CEQA Guidelines §§ 15126(d), 15126.2(d). The DEIR limits its analysis of growth-inducing impacts to economic and population growth, housing capacity, infrastructure, and service capacity. (DEIR at 5-4 to 5-6). However, CEQA requires an agency to also "discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively." CEQA Guidelines § 15126.2(d).

However, the DEIR fails to analyze the characteristic of this project to induce further solar development. Specifically, the construction of the gen-tie line may "encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively." *See* CEQA Guidelines § 15126.2(d). The viability of the proposed project could also serve to attract new project applicants to the area or ease the way for approval of other nearby projects, similar to how this DEIR cites to surrounding solar facilities to artificially minimize this Project's impacts and utilizes the existing Oberon substation. The analysis must consider future solar projects, which are constructed due to the growth-inducing effect of this Project, and their impacts to the environment.

## Conclusion

Thank you for considering these comments. As required by state, federal, and tribal law, we look forward to receiving your response to these comments. Please copy the Tribes' Attorney General, Rebecca A. Loudbear, at rebecca.loudbear@crit-nsn.gov,

and THPO Director Bryan Etsitty, at betsitty@crit-nsn.gov, on all correspondence to the Tribes.

Respectfully,

COLORADO RIVER INDIAN TRIBES

Amelia Flores ACTING
Chairwoman

Cc: Tribal Council of the Colorado River Indian Tribes
Bryan Etsitty, THPO Director, Colorado River Indian Tribes
Rebecca A. Loudbear, Attorney General, Colorado River Indian Tribes

**UPDATED Summary of Intersect Power's Interactions with Local Lake Tamarisk & Desert Center Community During Easley Permitting Process (as of 8/23/2024)**

**Since beginning development of the Easley Project, Intersect Power has:**

- Exchanged **hundreds (220+) of** phone calls, emails, and texts with members of the Lake Tamarisk and Desert Center communities and responded to numerous questions & concerns raised by local community members
- Met in-person with the local community in Lake Tamarisk/Desert Center area **eight** times, including hosting an open house for community members to learn about and provide feedback on the proposed project, **four** meetings to discuss the project, as well as **three** tours with community members to understand visual, recreation, hydrological, and other resources important to the community
- Met over zoom with the local Lake Tamarisk and Desert Center communities **eleven** times, including **two** zoom calls with members of Lake Tamarisk Desert Resort, **two** zoom meetings with stakeholders from the Chuckwalla Valley Raceway, **five** zoom meetings with stakeholders from Desert Center Unified School District, and **two** zoom meetings with leadership of the Set Free Desert Center Church
- Organized **two local volunteer events** in which members of the Intersect Power team traveled to the Desert Center and Blythe areas and distributed food to individuals/families in need in coordination with FIND Food Bank and completed campus restoration projects for Eagle Mountain School
- **Donated over $350,000** to Riverside County non-profit organizations, school district, museum, and towards local events
- Provided **fourteen** courtesy notifications to the local community regarding NEPA/CEQA milestones and on-site surveys/activity
- Beyond local community, also had **seven** meetings (combination of in-person/zoom) with local environmental NGO and tribal stakeholders regarding the proposed Easley project

**Detail on Lake Tamarisk/Desert Center Community Communication since CUP Application Filing Mid-2022**

**2022:**

- **Oct:**
  - Initial correspondence & conversations with members of Lake Tamarisk & Desert Center community about the proposed Easley project. Most of the correspondence centered around the community's questions and concerns regarding the initial project details and upcoming permitting process.
- **Nov:**
  - Phone discussion with Lake Tamarisk Board President, Kim Frazier

    - Various phone, email conversations with members of Lake Tamarisk (including Teresa Pierce)
- **Dec:**
    - In-person meeting with Lake Tamarisk Solar Committee (Mark Carrington, Teresa Pierce, Vicki Bucklin, others) at Teresa Pierce's home in LT
    - Zoom meeting with Lake Tamarisk community members to discuss hydrology concerns
    - Various phone, email, text conversations with members of Lake Tamarisk and property owners near Easley (including 3 phone calls, multiple texts with Teresa Pierce, various texts with Mark Carrington, phone call with Gary Warner, others)

**2023:**

- **Jan:** Various phone, email, text conversations with members of Lake Tamarisk answering questions and planning Feb open house
- **Feb:**
    - In-person open house at Lake Tamarisk rec center to discuss project (~100 attendees from Lake Tamarisk and Desert Center communities)
    - LT takes IP representatives on tour of nearby ATV trails
    - IP facilitates introduction to SB Energy for Mark Carrington regarding lighting concerns with Athos I&II project
    - Various phone, email, text conversations with members of Lake Tamarisk (including multiple with Teresa Pierce, Mark Carrington)
- **Mar:**
    - IP discusses compromise alternative (now Alt B, reduced footprint alt) with Lake Tamarisk community. Alt B increases project setback from community & moves substation further away out of line of sight directly in response to feedback received from community members in late 2022, early 2023
    - Various phone, email, text conversations with members of Lake Tamarisk (including phone calls with Don Sneddon and Gary Warner, and 4+ phone calls, multiple text message exchanges with Mark Carrington, correspondence with Teresa Pierce, others)
    -
- **Apr:**
    - Various phone, email, text conversations with members of Lake Tamarisk (including multiple phone calls, text conversations with Mark Carrington and others)
    - Initial zoom meeting with Desert Center Unified School District to introduce project and discuss community needs.
        - Subsequent $5,000 donation to Eagle Mountain School to create a school community garden
    - $15,000 donation to FIND Food Bank
    - Todd Casper, IP Construction Manager, provides tour of Oberon site to LT Resort Members, Vicki Buckland & Mark Carrington

  - IP provides courtesy notification of onsite activity
  - IP meets virtually with Set Free Desert Center Church to discuss project and understand community needs
- **May-Aug 2023**
  - Communication slows considerably from Lake Tamarisk Community with most resort members gone for summer months
  -
- **Sept:**
  - Phone conversation/email correspondence with LT solar committee in which IP offers to pay for vegetative screening on LT property to screen project from view; to date, no response has been received despite follow-up
  - Various phone, email, text conversations with members of Lake Tamarisk
  - IP sends notifications to all Lake Tamarisk and interested community members for NEPA scoping meeting; notifies all community members of upcoming on-site surveys

- **Oct:**
  - IP provides emergency port-a-potties to Eagle Mountain School in Desert Center, allowing it to remain open after a plumbing issue
  - Donated pumpkins for the Eagle Mountain School Fall Festival in Desert Center
  - Various phone, email, text conversations with members of Lake Tamarisk (including multiple calls, emails, texts with Mark Carrington and phone discussion with Gary Warner, other emails/texts)
  - Mark Carrington visits Oberon site to discuss soil stabilizers with Todd Casper, IP Construction Manager
  - IP provides courtesy notification of onsite activity
  - IP zoom call with Chuckwalla Valley Raceway to discuss hydrology concerns
- **Nov:**
  - IP sponsors Chiriaco Summit Veterans Day celebration ($2,000 donation)
  - Follow up zoom call with Chuckwalla Valley Raceway to discuss hydrology concerns
  - Various phone, email, text conversations with members of Lake Tamarisk
  - Zoom call with Desert Center Unified School District to discuss School's questions regarding local tax impacts
  - Zoom call with several Desert Center year round residents to discuss community needs
- **Dec:**
  - IP coordinates with Lake Tamarisk Lions Club to donate $2,500 of christmas gifts for local Desert Center children
  - Various phone and email conversations with members of Lake Tamarisk

**2024**

- **Jan:**

- IP provides emergency port-a-potties to Eagle Mountain School in Desert Center, allowing it to remain open after 2nd occurrence of plumbing issue
- IP sends notifications to all Lake Tamarisk and interested community members for Draft EIR Notice of Availability
- IP begins monthly Adopt-a-Highway Trash Clean up on I-10 near Desert Center and on Rice Road ($25,000/yr)
- IP donates $10,000 to the Blythe Chamber of Commerce to cover the cost of 4 new City of Blythe signs
- Email conversation with member of Lake Tamarisk

- **Mar:**
  - $155k donation to Desert Center Unified School District for new school bus, after school/summer programming, and grounds improvements
  - IP provides emergency port-a-potties to Eagle Mountain School in Desert Center, allowing it to remain open after 3nd occurrence of plumbing issue
  - IP donates emergency port-a-potties to Eagle Mountain School in Desert Center to ensure school can stay open if plumbing issues recur
- **Apr:**
  - Intersect Power does a volunteer day at Eagle Mountain School in Desert Center cleaning up school grounds, re-painting and restoring playground and school garden, installing new lunch tables, etc
  -
- **May:**
  - IP donates $40,000 to FIND Food Bank specifically for the Blythe Emergency Food Pantry
  - IP Provides courtesy notification ahead of on site activity
  - IP sends notifications to all Lake Tamarisk and interested community members for Partially Recirculated Draft EIR Notice of Availability
- **Jun:**
  - IP meets with members of Lake Tamarisk and Allen Grant Development over zoom to discuss questions on Easley project
  - IP donates $15,000 to the RUHS Foundation for foster children support programs in Riverside County
  - IP provides courtesy notification ahead of on site activity
- **Jul**
  - In-person meeting with Margit Chiriaco and member of Lake Tamarisk in Chiriaco Summit; IP commits to $50,000 donation to General Patton Memorial Museum and $7,500 sponsorship of Chiriaco Summit Veterans Day celebration
  - In-person meeting & tour at Chuckwalla Valley Raceway with raceway managers to discuss raceway flooding concerns
  - IP does volunteer day for FIND Food Bank in Blythe, handing out food to seniors

  - IP donates $50,000 to the FIND Food Bank specifically for the Set Free Desert Center food Pantry in Desert Center
  - IP provides courtesy notification ahead of on site activity
- **Aug**
  - IP sends notifications to all Lake Tamarisk and interested community members for Publication of Final EIR and Announcement of Public Meeting

JULY 2024 SEPTEMBER 2024

S M T W T F S S M T

intersect I

8/6/24, 5:36 PM

Dear Supervisor Perez

I wanted to share with you some thoughts I have after visiting with Intersect Power this last week.
I met with Elizabeth Knowles and her team that were in Blythe giving out food for those less fortunate in the area. They knew that I was not a total fan of solar but certainly in favor of the sun energy but maybe not the locations to the East. However, knowing this and knowing that the area is already so impacted by solar development, it would be hard to stop this freight train...and I do believe in reaching rational decisions to create accord within the communities being affected. I asked them how much they had donated to the communities in their sphere and they said they would send me a bullet point of donations made when they returned to their offices. And they were in touch and provided the information within a few days...and they said I could share with some of the folks that are in opposition, which I did.
Intersect Power has gifted to the Desert Center area over 320,000.00 this past year which is a significant amount for the small community. Most of which has helped the school , and the children. Families that struggle to provide have also been helped with food donations. Intersect has also provided money for clean up around the major I-10 intersection at Desert Center which is a constant source of trash and other rubbish thrown out or left on the road areas...over 25,000 a year goes for this clean up...This is a major effort on their part.
I believe Intersect is listening and trying to resolve the issues that the folks have with set backs and visual and dust and I would hope that,if possible , projects could be developed for the next years for Intersect to help fund. It is better to resolve these issues now and try and have designated work that will be funded now and in the future and benefit from the solar neighbors and by doing so, everyone will move forward in a positive way.
I wanted you to know that I'm still not in love with covering our beautiful desert with solar panels, but they are here and we cannot change that so better to work together creating harmony rather than discord. We all must be willing to accept change as it is inevitable...even I have to embrace change.

I wanted you to know this and I am tickled that they will also be title sponsors for the General Patton Museum Veterans Day event Nov 11, 2024. Its been a tough year to fund raise.

My best, Margit

--

**Margit F. Chiriaco-Rusche**
(760) 485-1576 Mobile

Dear Members of the Riverside County Board of Supervisors,

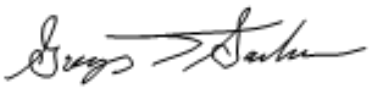
One of my roles as a superintendent is to create partnerships with local stakeholders within the school district. I am writing to express my appreciation for the outstanding support provided by Intersect Power to the Desert Center Unified School District in my time there as a superintendent/principal. In my opinion, their contributions have made a positive impact on the school and on the educational experiences of my students.

Some of the notable ways they have supported our school district include:

- Facilities Support: When our school faced plumbing issues, Intersect Power stepped in to help us keep our facilities operational by providing port-a-potties on three separate occasions. Furthermore, they generously donated a port-a-potty to our school, ensuring our school can remain open when future plumbing issues unexpectedly arise.
- Campus Beautification: Intersect Power organized a volunteer event where they donated $20,000 towards campus improvements. Their employees actively participated in a campus beautification volunteer effort that has contributed to a more engaging and welcoming space for our students.
- Educational Engagement: Intersect Power employees conducted a "Solar 101" educational presentation for the students o the school and took them on a tour of their Oberon project located within the school district. This hands-on experience not only enriched our students' knowledge but potentially inspired them to explore career opportunities in the field of renewable energy.
- Community Events and Donations: Intersect Power has also supported various school events and projects. They provided pumpkins for our Fall festival last year, donated $5,000 towards the ongoing development of the school garden, and made a significant $135,000 donation for the purchase of a new school bus and funding for our ELO summer programming for our students.

In my opinion, the stakeholder partnership has been notable, marked by a shared dedication to enhancing the educational experience and well-being of the students. Their ongoing support has had a tangible and positive impact on our school community, and for that, I am extremely grateful.

Sincerely,



Dr. Greg Sackos
Superintendent/Principal

FIND FOOD BANK
THE DESERT'S REGIONAL FOOD BANK
83775 CITRUS AVE INDIO, CA 92201

August 23, 2024

Riverside County Board of Supervisors
480 Lemon Street
Riverside, CA 92501

Dear Riverside County Board of Supervisors,

Please use this letter as confirmation of partner services between FIND and Intersect Power since 2023. Intersect Power's contribution and support to FIND has helped provide thousands of meals to those who are food insecure in the desert region. We appreciate Intersect Power's investment and efforts in prioritizing hunger relief for the children, families and seniors in Blythe and Desert Center region.

Sincerely,

Debbie Espinosa
President & CEO

August 9, 2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

As a Councilman, Riverside County LAFCO Commissioner, local Commercial Real Estate Agent, and longtime resident of La Quinta, I am pleased to offer my endorsement of the Easley Renewable Energy Project.

The Easley project will create more than 500 jobs, generate significant economic benefits for the County, and will deliver clean power to hundreds of thousands of homes.

Intersect Power, the Easley project developer, is the kind of company we want in Riverside County. Their advocacy for local labor, generous donations to local non-profits and the Desert Center school, and their responsiveness to community feedback by adjusting the project footprint, all demonstrate their commitment to the local community. Supporting such development and companies is vital for the County's growth and prosperity; as such, the County should support development and companies that serve and invest in the local community.

I support the Easley project, and I urge you to vote yes on this project.

Sincerely,

Steve Sanchez
La Quinta Councilman
Riverside County LAFCO Commissioner
Commercial Real Estate Agent

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

***SET FREE CHURCH DESERT CENTER***
***25980 Kaiser Road #103***
***Desert Center, California 92239***
***760-899-6669***

September 21, 2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Members of the Riverside County Board of Supervisors,

I hope this letter finds you well. I am writing to share with you the positive impact that Intersect Power, the Easley project developer, has had on our community here in Desert Center. As a leader of the Set Free Desert Center Church, I have had the privilege of witnessing firsthand the commitment and generosity demonstrated by Intersect Power. Their dedication to our community has been both significant and inspiring.

Recently, Intersect Power made a substantial donation to the Set Free Food Pantry, a food pantry in Desert Center, in partnership with the FIND Food Bank. Their donation covered the cost of food for an entire year. In addition to this generous contribution, they have also funded crucial upgrades to the pantry, ensuring that our food bank can continue to serve the needs of our residents efficiently and effectively.

On behalf of Set Free Desert Center Church and the residents of Desert Center, I want to applaud Intersect Power for these efforts that have made a remarkable impact on our community, and I am hopeful to continue our community partnership.

Sincerely,
Jeni Navarro
Set Free Desert Center Church

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am reaching out to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Jose A. Lagunes

Subject: Strong Support for Easley Solar Project and its Local Job Creation

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am writing to you as a union worker eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As a member of the local community whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

The Easley Solar Project will create jobs in our region through its construction and operation phases. This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents more broadly. Supporting infrastructure development projects like the Easley Solar Project is crucial for bolstering the Riverside County job market and providing sustainable employment for local workers.

In addition to the Project's economic benefits, its advancement of renewable energy aligns with our values as union workers concerned about the environment. By reducing greenhouse gas emissions, the Easley Solar Project contributes to a cleaner and more sustainable future for our community.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the workforce. This inclusive approach reflects a dedication to creating a project that not only meets its energy production goals but also enhances the lives of area residents through job creation and community engagement.

As a union worker, I look forward to the positive impact the Easley Solar Project will have on our community and call on the Riverside County Supervisors to approve it.

Sincerely,

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

I am reaching out to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union worker and member of the community, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operational phases. This Project not only offers personal employment prospects for workers like me but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure development projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

We appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy underscores a genuine commitment to developing a project that not only achieves its renewable energy objectives but also enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,

Nicholas Lua

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am reaching out to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Jose Grijalva IV

X Jose Grijalva IV

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

I am reaching out to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union worker and member of the community, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operational phases. This Project not only offers personal employment prospects for workers like me but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure development projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

We appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy underscores a genuine commitment to developing a project that not only achieves its renewable energy objectives but also enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

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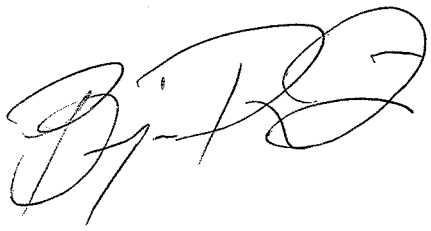
As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,



7/18/2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

I am a Desert Center property owner, and I am proud to offer my endorsement of the Easley Renewable Energy Project. I have owned property in Desert Center for more than 12 years and I support other businesses that serve and support local communities. In my opinion, solar projects are a great use of the area.

The Easley project is a great development for Desert Center. It is already designated for solar energy uses and it is setback from existing development in the area. Also, implementation of this project will drive significant job creation and economic growth in the Desert Center area and broader Riverside County.

I would be proud to have the Easley project in my neighborhood of Desert Center, and I urge the County to vote yes on this project.

Sincerely,

Douglas Percival
Homeowner at 26800 Fairway Drive, Desert Center, CA 92239
(Lake Tamarisk)

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

29335 Wrangler Dr
Murrieta, CA 92563

8/6/2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

As a resident of Riverside County, I am pleased to offer my endorsement of the Easley Renewable Energy Project. The Easley project will create more than 500 jobs and generate economic opportunities for many Riverside County businesses.

I moved to Riverside County this year and I support other businesses that serve and support local communities. The Easley solar project is an example of a business that has demonstrated a commitment to local hire, procurement and community service. Intersect Power is a small San Francisco-based company with a goal to develop clean energy to benefit current and future generations of California residents and businesses. I support the Easley project and I urge you to vote yes on this project.

Sincerely,

Nicholas Barrientos
29335 Wrangler Dr
Murrieta, CA 92563

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

July 30, 2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

I am a former Desert Center property owner, and I am proud to offer my endorsement of the Easley Renewable Energy Project. The project is in an area of Desert Center that is designated for solar energy uses and Intersect Power has designed the project to minimize any impacts to nearby development in the area.

We have found Intersect Power to be a great neighbor in Desert Center throughout the recent years.

The Easley project is a great development for Desert Center. I urge the County to vote yes on this project.

Sincerely,

JoAnn Dean

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

7/29/24

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Re: Support for Easley Renewable Energy Project

Dear Supervisors:

I am a Desert Center property owner and Riverside County resident, and I am proud to offer my endorsement of the Easley Renewable Energy Project. I have owned property in Desert Center for more than 10 years.

The Easley project is a boon for Desert Center because it brings much needed economic development and good paying jobs to the area. Long term, this and other solar energy projects help decrease our nation's reliance on fossil fuels and provide a Green, sustainable energy source..

It is important to note that the project area is already designated for solar energy uses, and it is generously set back in distance from existing residential development in the area.

I proudly urge the County to vote "Yes" on this project.

Sincerely,

DocuSigned by:
Philip Percival
42E434A92E1A46A...

Philip Percival
Real Estate Broker - BRE #01420682

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

Intersect Power

**Charity Wagner <charity.wagner@intersectpower.com>**

# Easley Solar Project

**Brian Johnson** <johnsonmobileestates@gmail.com> Tue, Jul 30, 2024 at 10:04 AM
To: KSSpiegel@rivco.org, PPaule@rivco.org, v.mperez@rivco.org, SAHERNAN@rivco.org, District1@rivco.org, JTGreene@rivco.org, C.Washington@rivco.org, RBrock@rivco.org, district5@rivco.org, Twheeler@rivco.org, Dedgington@rivco.org
Bcc: charity.wagner@intersectpower.com

July 30, 2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

I am a Desert Center property owner, and I am proud to offer my endorsement of the Easley Renewable Energy Project. I have owned and operated a land and business Desert Center for more than 44 years and I support other businesses that serve and support local communities.

The Easley project is a great development for Desert Center. It is already designated for solar energy uses and it is setback from existing development in the area. Also, implementation of this project will drive significant job creation and economic growth in the Desert Center area and broader Riverside County.

I would be proud to have the Easley project in my neighborhood of Desert Center, and I urge the County to vote yes on this project.

Sincerely,

Brian Johnson
JMP Inc

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

**JMP Support Letter Desert Center Easley Project.docx**
347K

07/25/2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

As a renewable energy construction site supervisor living and working in Riverside County, I am pleased to offer my endorsement of the Easley Renewable Energy Project. I have seen firsthand how many jobs, industries, and personnel are directly positively impacted by renewable projects. At the Oberon 1&2 Project, also developed by Intersect Power currently providing renewable energy, all personnel employed on site live in Riverside County and directly benefit from the energy and jobs provided. The Oberon Solar Project created more than 930 union jobs and accounted for more than $30 million in direct investment to Riverside County. In addition to the permanently employed personnel at the Oberon Solar Project, we look to local businesses and industries to provide the services we need when available. The Easley project will create more than 500 jobs and generate economic opportunities for many Riverside County businesses.

Local job creation is an enormously important benefit of procuring large-scale renewable energy. The Easley project and its developer, Intersect Power, are collaborating with local firms which have come to realize this important project. They have also demonstrated their commitment to ensuring local labor will benefit from the project by entering into a project labor agreement with local unions. The Easley Project is a terrific way for Riverside County to continue its growth in number of jobs created and renewable energy provided.

I have lived in worked in Riverside County for just over a year and I support other businesses that serve and support local communities. Renewable projects like Easley are what brought my family and I to the region and is something I have been enthusiastic about for a long time. The Easley solar project is an example of a business that has demonstrated a commitment to local hire, procurement, and community service. Intersect Power is a small San Francisco-based company with a goal to develop clean energy to benefit current and future generations of California residents and businesses. I support the Easley project and I urge you to vote yes on this project.

Sincerely,

Aaron Hodges
Site Supervisor- Oberon 1&2 Solar Project
27200 Rice Rd. Desert Center, CA 92239

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

08/05/2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

My name is Emanuel Hernandez. I am a site supervisor for the Athos III solar project in Blythe, Riverside County. I am pleased to offer my endorsement of the Easley Renewable Energy Project. I have worked in Riverside County for two years and I support other businesses that serve and support local communities. We also use various local Riverside contractors and businesses for any work that is needed for the site.

The Easley project and its developer, Intersect Power, have demonstrated their commitment to ensuring local labor will benefit from the project by entering into a project labor agreement with local unions. Local job creation is an enormously important benefit of procuring large-scale renewable energy. I know this firsthand because I am currently employed on a renewable energy project in Riverside County. My work in renewable energy supports my family and allows to work pretty close to home, and not have to commute to other states for work.

The Easley solar project is an example of a business that has demonstrated a commitment to local hire, procurement and community service. They hire folks like me to successfully implement projects. For all these reasons, I support the Easley project and I urge you to vote yes on this project.

Sincerely,

Emanuel Hernandez Uribe
Site Supervisor
BMS2, CAL1, SGAH, SGAK, SGSO
P:760-554-8470 | emanuel.hernandez@novasourcepower.com

NOVASOURCE™
POWER SERVICES

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

GREATER COACHELLA VALLEY CHAMBER

Dear Mr. Wheeler,

I am writing on behalf of the Greater Coachella Valley Chamber of Commerce to express our enthusiastic support for Intersect Power's Easley Solar Project, which is poised to make a significant positive impact on Riverside County.

Beyond the immediate economic benefits, Intersect Power has demonstrated a strong commitment to social investment in the Riverside County area. They have a track record of engaging with local communities and supporting initiatives that enhance the quality of life for residents. Their dedication to responsible development includes measures to protect the environment and collaborate with stakeholders to address concerns.

We appreciate Intersect Power's commitment to partnering with local organizations, such as the Greater Coachella Valley Chamber of Commerce, to foster positive relationships and ensure the project's success benefits our community. This engagement and their willingness to work closely with the residents of Riverside County exemplify their dedication to being good corporate citizens.

We believe that this project not only represents a significant step towards a sustainable energy future but also a remarkable opportunity for economic growth and community development in Riverside County. We urge the Bureau of Land Management to give favorable consideration to this project, taking into account its substantial economic benefits and the commitment of Intersect Power to support the local area.

Thank you for your attention to this matter, and we look forward to witnessing the positive impacts that the Easley Solar Project will bring to our community.

Sincerely,

Brandon Marley, President & CEO

Greater Coachella Valley Chamber of Commerce

Audubon

Riverside County Planning Department
Attn: Tim Wheeler, Project Planner
48 Lemon Street, 12th Floor
Riverside, CA 92502
TWheeler@rivco.org

cc: Darren Edgington (DEdgingt@rivco.org)
Supervisor Manuel Perez (v.mperez@rivco.org)
Steve Hernandez (sahernan@rivco.org)

Dear Mr. Wheeler:

Thank you for the opportunity to comment on the recirculated Draft Environmental Impact Report (DEIR) for the Easley Solar Project.

Audubon protects birds and the places birds need, today and tomorrow. Audubon works throughout the Americas using science, advocacy, education, and on-the-ground conservation. State programs, nature centers, chapters, and partners give Audubon an unparalleled wingspan that reaches millions of people each year to inform, inspire, and unite diverse communities in conservation action. A nonprofit conservation organization since 1905, Audubon believes in a world in which people and wildlife thrive.

Our 2019 climate science available at https://climate.audubon.org reveals that unless we can keep warming below 3° Celsius, 389 species of birds in North America will probably go extinct from loss of climate suitability in their wintering or breeding ranges. One hundred percent clean energy and net zero emissions by 2050 is our goal to protect our birds by keeping warming to 1.5°Celsius. For birds and many other wildlife species, however, climate change planning must do more; it must both preserve key resources and habitats needed in coming decades as warming increases, as well as protect climate strongholds resilient to climate change that will provide a safe haven for many decades to come. These issues are especially true in the desert southwest, where increasing the development of renewables while protecting habitats and species is most challenging.

The Project

IP Easley, LLC, IP Easley II, LLC, and IP Easley III, LLC, subsidiaries of Intersect Power, LLC, propose to construct, operate and decommission the Easley Renewable Energy Project (Easley Project or Project), 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 proposed Project application area is located on approximately 3,735 acres of private and BLM-administered land, in Riverside County north of Desert Center, California. The Project would generate up to 400 megawatts (MW) of renewable electricity via arrays of solar photovoltaic (PV) panels, store up to 650 MW in a battery energy storage system (BESS), and include appurtenant facilities. A 6.7-mile 500 kilovolt (kV) generation-tie (gen-tie) line would mainly traverse across the Oberon Renewable Energy Project site (south of the Project site) and connect into an existing substation on the approved Oberon Project site. The Oberon Project is a solar PV and energy storage facility owned by Intersect Power. From the Oberon onsite substation, the power generated by the Easley Project would be transmitted to the Southern California Edison (SCE) Red Bluff Substation via the existing Oberon 500 kV gen-tie line.

We appreciate the "significant new information" added to the recirculated DEIR especially the Best Management Practices and BLM Conservation and Management Actions, additional Alternatives and additions to the Biological Resources and the Appendices including the Bird & Bat Conservation Strategy and Nesting Bird Management Plan.

Support for Project Action Alternative

Audubon's long-standing policy is to support clean energy projects that are well-sited and operated to avoid, minimize, and mitigate effectively for the impacts on birds and the places birds need, especially to adapt to climate change.

As a stakeholder in the Desert Renewable Energy Conservation Plan (DRECP) we support development of wind and solar in the Development Focus Areas (DFAs) using the Conservation Management Actions (CMAs) of the DRECP, especially to address the impacts of the project on microphyll or desert dry wash woodlands. *('dry washes occupy less than 5% of this subsection of the Sonoran desert but support 90% of its bird life" – Mark Dimmitt, A Natural History of the Sonoran Desert, 2000*).

We see that the Easley Project has committed to these CMAs on public as well as private lands. Key to siting of utility-scale solar energy is adhering to the Mitigation Hierarchy of addressing impacts: avoid first, minimize what can't be avoided, and as a last measure provide compensatory mitigation to offset the loss due to impacts that cannot be avoided or minimized.

Easley is located on a combination of previously disturbed, former agricultural private land and public land designated by the DRECP as a Development Focus Area (DFA). The siting of the Easley Renewable Energy Project on lower-quality habitat and the Project's adherence to the DRECP's Conservation and Management Actions (CMAs) on both public and private lands will ensure avoidance, minimization, and mitigation of birds, other wildlife, and other environmental impacts. The project is an example of how responsible siting and operation can bring conservation and clean energy hand in hand in difficult environments.

The Easley project's Draft Environmental Impact Report (EIR), including the Partially Recirculated Draft EIR, clearly identifies the impacts and necessary mitigation for species affected by the project.

Audubon also supports the Easley Project's Bird and Bat Conservation Strategy (BBCS), which has taken lessons learned and best practices from other solar projects in the region to ensure effective avoidance, minimization, and mitigation for impacted bird species throughout both construction and the operational life of the Project.

However, we propose an addition to the monitoring and adaptive management section of that BBCS.

In June 2024, the California Energy Commission (CEC) released a report titled Investigating the "Lake Effect" Influence on Avian Behavior from California's Utility-Scale Photovoltaic Solar Facilities. The report looked at utility-scale solar facilities in California and examined the so-called lake effect hypothesis that aquatic birds may mistake a large field of solar panels as a water body, and this attraction could lead to death or injury when birds attempt to land. The results from this research are largely consistent with the lake effect hypothesis in some instances depending on species, time of day, flight path and other circumstances. However, the study did not confirm that the possible attraction of aquatic birds to PV light from solar panels resulted in collision and mortality, and advised that further research is needed. It is also unknown if this attraction is widespread and not just limited to some solar projects in the desert of California.

Accordingly, we recommend that the BBCS include a monitoring and adaptive management plan that will document the interaction of birds with the project in real time, and recommend that recently developed camera + AI technology, if commercially available or available in kind from Argonne National Labs, be used so that avoidance rates as well as any potential collision rates be recorded. This methodology in our opinion is preferable to carcass searches by biologists and/or dogs.

In conclusion, Audubon recommends that the County and the BLM approve the Easley project's Reduced Footprint Alternative. In our opinion this Alternative best represents a responsible approach to renewable energy development that balances the need for clean energy with prioritizing important wildlife habitats and community interests.

Thank you for the opportunity to comment.

Sincerely,

Garry George
Senior Director, Climate Strategy
Director, Clean Energy Initiative
Audubon
garry.george@audubon.org

29335 Wrangler Dr
Murrieta, CA 92563

8/6/2024

Supervisor Karen Spiegel KSSpiegel@rivco.org
Phil Paule, Chief of Staff PPaule@Rivco.org
Supervisor V. Manuel Perez, Vice Chair v.mperez@rivco.org
Steve Hernandez, Chief of Staff SAHERNAN@rivco.org
Supervisor Kevin Jeffries District1@rivco.org
Jeffrey Green, Chief of Staff JTGreene@rivco.org
Supervisor Chuck Washington, Chair C.Washington@rivco.org
Robyn Brock, Chief of Staff RBrock@RIVCO.ORG
Supervisor Yxstian Gutierrez district5@rivco.org

Dear Supervisors:

As a resident of Riverside County, I am pleased to offer my endorsement of the Easley Renewable Energy Project. The Easley project will create more than 500 jobs and generate economic opportunities for many Riverside County businesses.

I moved to Riverside County this year and I support other businesses that serve and support local communities. The Easley solar project is an example of a business that has demonstrated a commitment to local hire, procurement and community service. Intersect Power is a small San Francisco-based company with a goal to develop clean energy to benefit current and future generations of California residents and businesses. I support the Easley project and I urge you to vote yes on this project.

Sincerely,

Nicholas Barrientos
29335 Wrangler Dr
Murrieta, CA 92563

CC: Tim Wheeler, Planning Department, Twheeler@rivco.org
Darren Edgington, Planning Department, Dedgington@rivco.org

INTERNATIONAL BROTHERHOOD of ELECTRICAL WORKERS

Local Union 440

1405 Spruce Street, Suite G
Riverside, CA 92507
TEL (951) 684-5665
FAX (951) 369-9032

March 15, 2024

Tim Wheeler
twheeler@rivco.org
County of Riverside, Planning Dept.

Subject: Endorsement of Intersect Power's Easley Solar Project and EIR

Dear Mr. Wheeler,

As the Business Manager of the International Brotherhood of Electrical Workers (IBEW), I am proud to endorse Intersect Power's Easley Solar Project. This infrastructure project holds immense potential to drive job creation and economic growth in the Desert Center area and broader Riverside County.

We support both the Proposed Project and the Lake Tamarisk Alternative, as discussed in the draft Environmental Impact Report (EIR), and believe that all impacts, as described, would be sufficiently mitigated by the Mitigation Measures included in the EIR. We appreciate that the Lake Tamarisk Alternative was developed in response to the local community's concern and believe it adequately addresses impacts to local residents.

The Easley Solar Project promises to inject vitality into our local economy by generating employment opportunities and stimulating economic activity. With its implementation, we anticipate a surge in job opportunities and an expansion of the tax base, providing much-needed resources for public services and infrastructure development.

We believe that supporting projects like Easley Solar is crucial for the prosperity of our community and the advancement of our workforce. Therefore, we urge you to prioritize its approval and implementation.

Thank you for your attention to this matter. Please do not hesitate to contact us for further information or assistance.

Sincerely,

Jeremy Forshaw
Business Manager
IBEW Local 440

JF: lt

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Alfonso Barajas 7-12-24

IBEW Local 440

Alfonso Barajas

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Andrew Vasquez

IBEW Local 440

7/12/24

Subject: Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union member, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operation. This project not only offers personal employment prospects for workers like me, but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

I really appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy really shows Intersect's genuine commitment to developing a project that achieves its renewable energy objectives and enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and respectfully ask the Riverside County supervisors to approve it.

Thank you,

Kevin Hachae 7/12/2024

IBEW Local 440

Subject: Strong Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member, eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As an active member of IBEW Local 440 whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the local workforce.

I look forward to the positive impact the Easley Solar Project will have on our community, and I urge the Riverside County Supervisors to approve it.

Thank you,

Andrew Santana

IBEW Local 440

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

IBEW Local 440

Sergio Rocha

Subject: Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union member, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operation. This project not only offers personal employment prospects for workers like me, but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

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As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and respectfully ask the Riverside County supervisors to approve it.

Thank you,

Juan Cruz Santana #8359254

IBEW Local 440

Subject: Support for Easley Solar Project and its Creation of Local Jobs

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I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

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I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

RAYMOND MARTINEZ #D861110

IBEW Local 440

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am reaching out to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

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I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project. X [signature] 8-22-24

Thank you,

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

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I urge you to approve the Easley Project.

Thank you,

Raul Avitia

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

I am reaching out to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

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I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

I am reaching out to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union worker and member of the community, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operational phases. This Project not only offers personal employment prospects for workers like me but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure development projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

We appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy underscores a genuine commitment to developing a project that not only achieves its renewable energy objectives but also enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,

Sergio Garcia

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

I am reaching out to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union worker and member of the community, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operational phases. This Project not only offers personal employment prospects for workers like me but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure development projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

We appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy underscores a genuine commitment to developing a project that not only achieves its renewable energy objectives but also enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,

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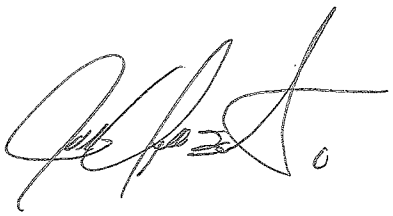
Sincerely,



JUAN URQUIZO

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

IBEW Local 440

Subject: Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union member, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operation. This project not only offers personal employment prospects for workers like me, but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

I really appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy really shows Intersect's genuine commitment to developing a project that achieves its renewable energy objectives and enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and respectfully ask the Riverside County supervisors to approve it.

Thank you,

IBEW Local 440

MARCUS BLACKWELL

Subject: Strong Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member, eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As an active member of IBEW Local 440 whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the local workforce.

I look forward to the positive impact the Easley Solar Project will have on our community, and I urge the Riverside County Supervisors to approve it.

Thank you,

IBEW Local 440

Khadeejah Soper

Subject: Strong Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member, eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As an active member of IBEW Local 440 whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the local workforce.

I look forward to the positive impact the Easley Solar Project will have on our community, and I urge the Riverside County Supervisors to approve it.

Thank you,

IBEW Local 440

VICENTE AGUIRRE

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member looking forward to the employment opportunities that Intersect Power's Easley Solar Project will offer to Riverside County. As a resident of our local community, I want to express my support for this project.

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I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach demonstrates an honest commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

IBEW Local 440

Colton Torrez

Subject: Support for Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

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I urge you to approve the Easley Project.

Thank you,

IBEW Local 440

Mike St.

Subject: Strong Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member, eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As an active member of IBEW Local 440 whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the local workforce.

I look forward to the positive impact the Easley Solar Project will have on our community, and I urge the Riverside County Supervisors to approve it.

Thank you,

IBEW Local 440

Subject: Support for Easley Solar Project and its Creation of Local Jobs

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I urge you to approve the Easley Project.

Thank you,

John Rush

IBEW Local 440

TIMOTHY WOOTEN

Subject: Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union member, I urge you to approve the Easley Project.

The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operation. This project not only offers personal employment prospects for workers like me, but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

I really appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy really shows Intersect's genuine commitment to developing a project that achieves its renewable energy objectives and enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and respectfully ask the Riverside County supervisors to approve it.

Thank you,

IBEW Local 440

Subject: Strong Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member, eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As an active member of IBEW Local 440 whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the local workforce.

I look forward to the positive impact the Easley Solar Project will have on our community, and I urge the Riverside County Supervisors to approve it.

Thank you,

Jacob Barajas

IBEW Local 440

Subject: Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

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As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and respectfully ask the Riverside County supervisors to approve it.

Thank you,

Gabriel Rivera

IBEW Local 440

Anthony Larner

Subject: Support for Easley Solar Project and its Creation of Local Jobs

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I urge you to approve the Easley Project.

Thank you,

A. Larner 7/12/24

IBEW Local 440

Subject: Strong Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to you as a union member, eagerly anticipating the employment opportunities that Intersect Power's Easley Solar Project will bring to Riverside County. As an active member of IBEW Local 440 whose livelihood depends on the approval of projects like this, I want to express my strong endorsement for this project.

This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the local workforce.

I look forward to the positive impact the Easley Solar Project will have on our community, and I urge the Riverside County Supervisors to approve it.

Thank you,

Zachary Ramirez

07/12/2024

IBEW Local 440

Lazaro Garcia

Subject: Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

I am writing to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union member, I urge you to approve the Easley Project.

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Thank you,

7/12/24

IBEW Local 440

Jose R Figueroa

Subject: Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez:

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IBEW Local 440

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Thank you,

Anthony Lopez

IBEW Local 440

Subject: Support for Easley Solar Project

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Thank you,

John Garcia

IBEW Local 440

Subject: Support for Easley Solar Project

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IBEW Local 440

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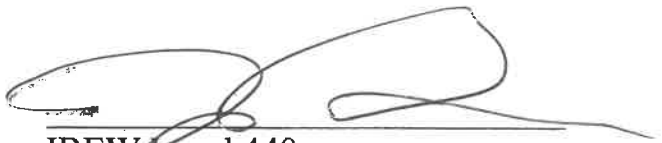

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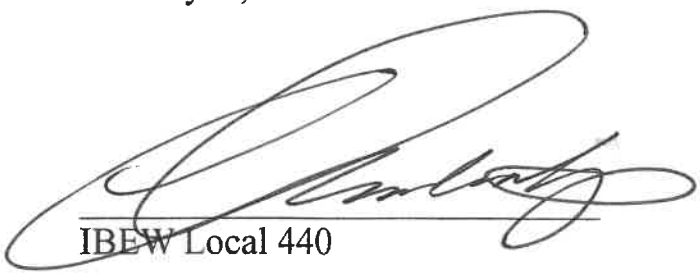

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The Easley Solar Project presents a significant opportunity to boost employment in our region, both during its construction and operation. This project not only offers personal employment prospects for workers like me, but also promises to enhance the economic prosperity of Riverside County and its residents as a whole. Embracing infrastructure projects like Easley is essential for fostering a robust job market and ensuring sustainable employment for our local workforce.

I really appreciate Intersect Power's collaborative approach in engaging with local stakeholders, including the workforce. This inclusive strategy really shows Intersect's genuine commitment to developing a project that achieves its renewable energy objectives and enriches the lives of our residents through job creation and community involvement.

As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and respectfully ask the Riverside County supervisors to approve it.

Thank you,

IBEW Local 440

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

I am reaching out to express my support for Intersect Power's Easley Solar Project and its creation of local jobs in Riverside County. As a dedicated union worker and member of the community, I urge you to approve the Easley Project.

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As a union member, I look forward to the positive impact that the Easley Solar Project will have on our community and call on the Riverside County supervisors to approve it. If there is an opportunity to provide further input or insights from the perspective of potential employees, please do not hesitate to reach out.

Sincerely,

X Jose Angel Gonzalez

Subject: Strong Support for Easley Solar Project and its Local Job Creation

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

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The Easley Solar Project will create jobs in our region through its construction and operation phases. This is not only an opportunity for the Supervisors to support my personal employment, but the Project also represents a chance to contribute to the economic well-being of Riverside County and its residents more broadly. Supporting infrastructure development projects like the Easley Solar Project is crucial for bolstering the Riverside County job market and providing sustainable employment for local workers.

In addition to the Project's economic benefits, its advancement of renewable energy aligns with our values as union workers concerned about the environment. By reducing greenhouse gas emissions, the Easley Solar Project contributes to a cleaner and more sustainable future for our community.

We appreciate Intersect Power's commitment to collaboration with local stakeholders, including the workforce. This inclusive approach reflects a dedication to creating a project that not only meets its energy production goals but also enhances the lives of area residents through job creation and community engagement.

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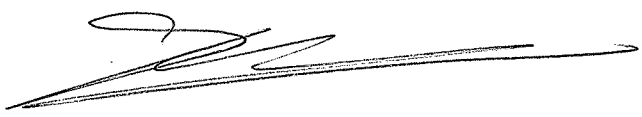

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

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The Easley Solar Project will have a substantial economic benefit in our community. I firmly believe that backing infrastructure projects like the Easley Solar Project is vital to support the job market and establish sustainable employment avenues for our local workforce and people like me.

I appreciate Intersect Power for its efforts to engage with local stakeholders, including the workforce, in the development of this project. This collaborative approach underscores a genuine commitment to creating a project that not only achieves its renewable energy goals but also delivers tangible benefits to community members through job creation.

I urge you to approve the Easley Project.

Thank you,

Roberto Medina

Subject: Laborer Support for Easley Solar Project

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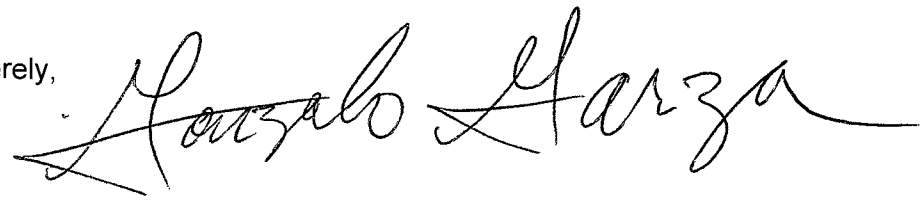

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Juan Bellrah

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

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Sergio Ramirez

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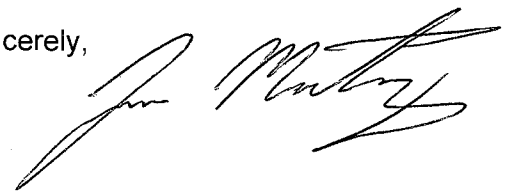

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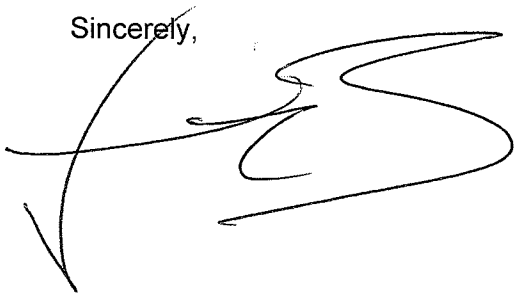

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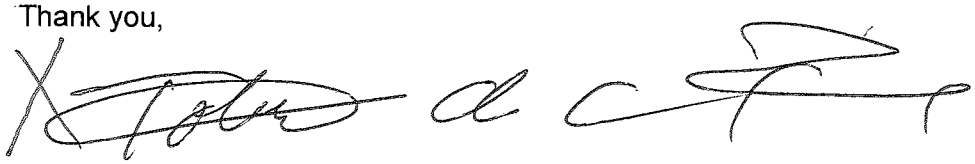

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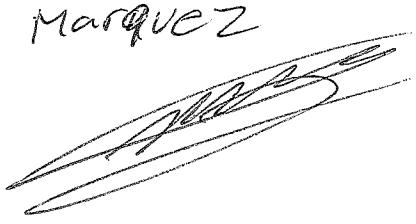
Jose Marquez



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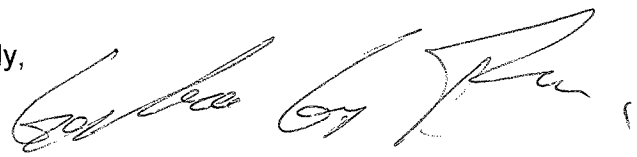

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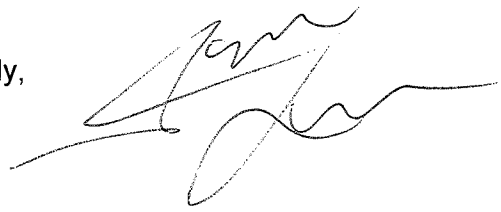

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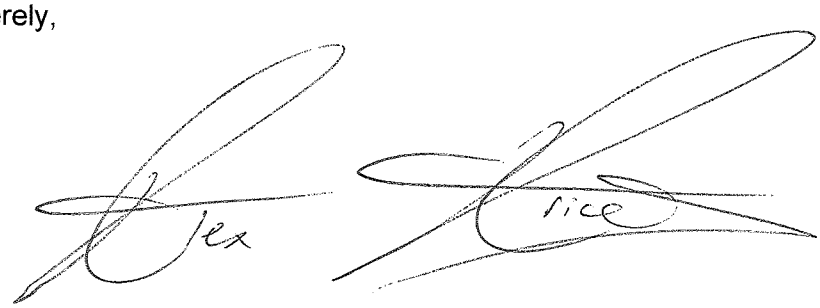

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Nick Gumbleton
Local 1184

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Mario Gamboa
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Subject: Support for the Easley Solar Project and its Creation of Local Jobs

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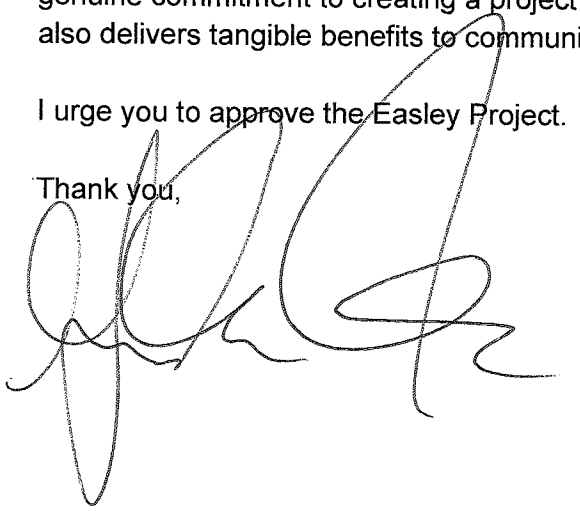

5/31/24

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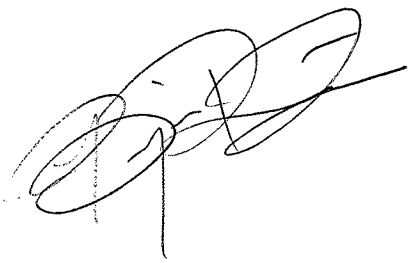

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

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Thank you,

Roberto Velez

Subject: Strong Support for Easley Solar Project and its Local Job Creation

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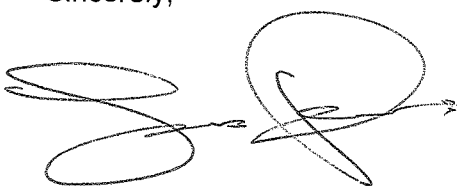

Subject: Laborer Support for Easley Solar Project

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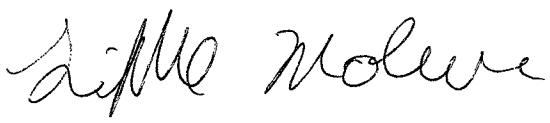

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Felipe Aragón

Subject: Strong Support for Easley Solar Project and its Local Job Creation

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Subject: Support for the Easley Solar Project and its Creation of Local Jobs

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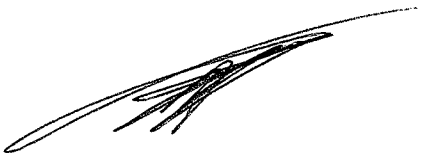

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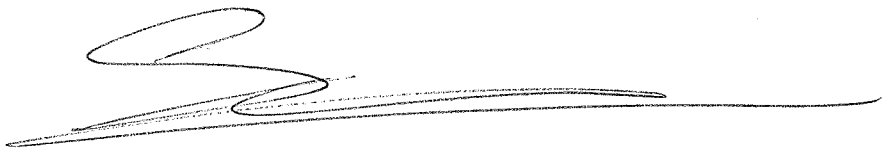

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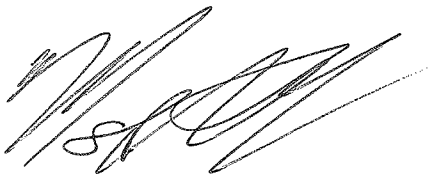

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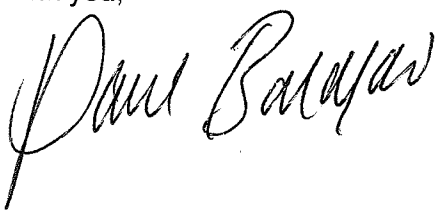

Subject: Support for the Easley Solar Project and its Creation of Local Jobs

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez,

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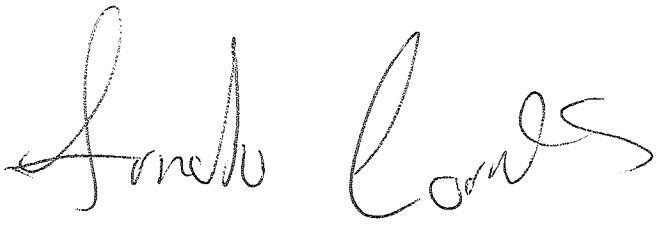

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Thank you,

Francisco Nuñez

Subject: Laborer Support for Easley Solar Project

Dear Supervisors Perez, Jeffries, Spiegel, Washington, and Gutierrez

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Sincerely,

Francisco Sanchez

Subject: Strong Support for Easley Solar Project and its Local Job Creation

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Mike Miner

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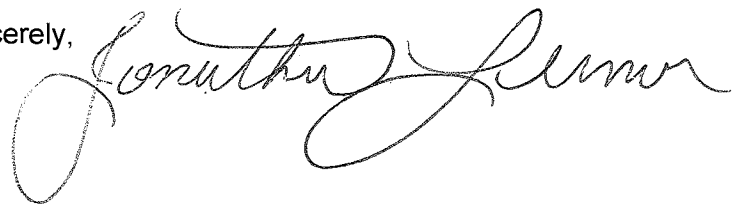

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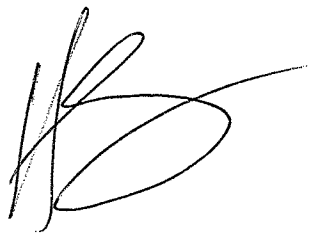

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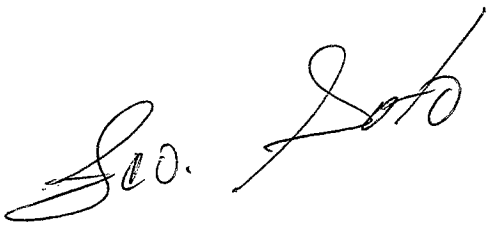

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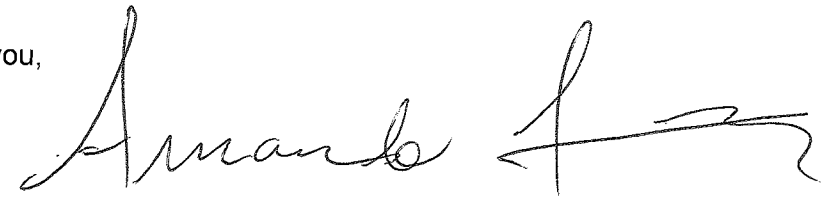

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Thank you,

Derek Patrick Burnham

6-26-24

Subject: Strong Support for Easley Solar Project and its Local Job Creation

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Jose Marquez

Subject: Laborer Support for Easley Solar Project

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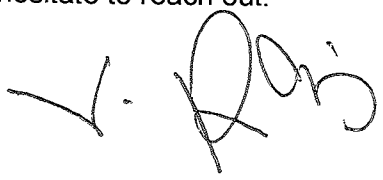

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Subject: Strong Support for Easley Solar Project and its Local Job Creation

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JUAN PARRA JR. 7-26-24

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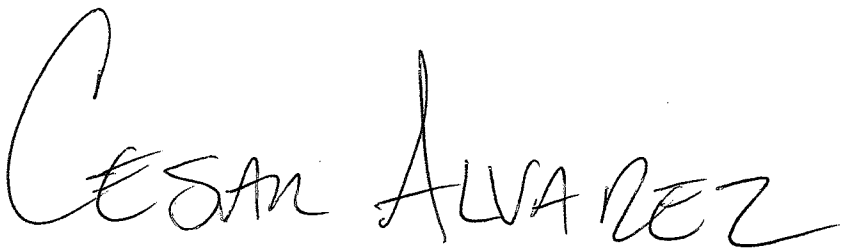

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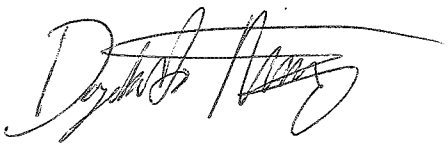

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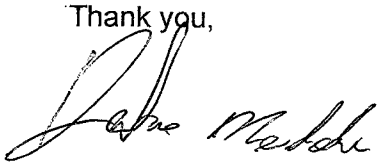

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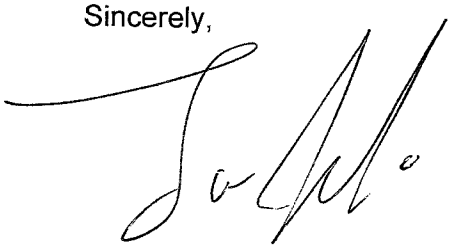

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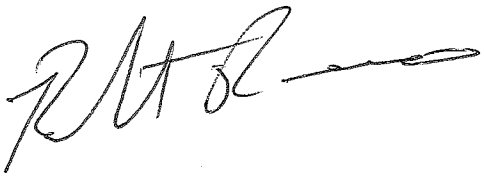

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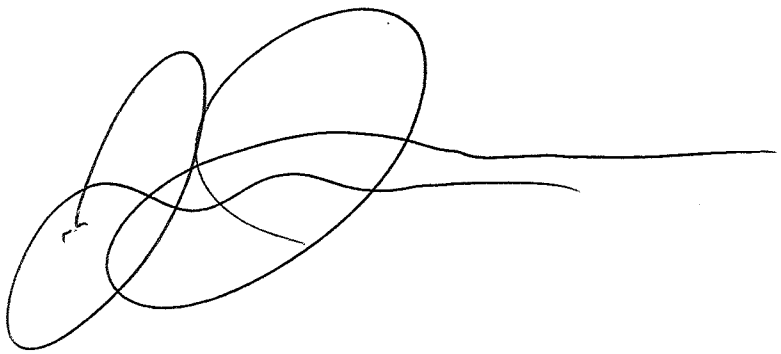

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Juan Jose Paz

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Intersect Power

intersectpower.com

# Easley Renewable Energy Project
# Summary of Riverside County Economic Benefits

| Economic Metric | Operational Life Total |
|---|---|
| **Local Sales Tax** | **$23,726,000** |
| **Local Property Tax** | **$96,100,000** |
| **DA Development Impact + Community Benefit Fee** | **$785,000** |
| **DA Solar B-29 Public Benefit Fee** | **$15,266,000** |
| **Total Direct Contribution to Riverside County** | **$135,877,000** |
| **Local Land Purchase Payments to Landowners** | **$18,000,000** |
| **Voluntary Social Investment - Donations to Local Organizations** | **$3,500,000** |
| **Total Direct Contribution to Local Community** | **$21,500,000** |
| **Modeled Indirect Local Expenditures** | **$146,610,000** |
| **Grand Total** | **$303,987,000** |
| **Construction Jobs** | **530** temporary |
| **Operations Jobs** | **10** permanent |
| **Total Jobs** | **540** |

**NOTE:** Figures are estimates assuming approval of FEIR Reduced Footprint Alternative B in Aug 2024. Actuals may vary based on selected Alternative, change in tax law, and other variables. Indirect local expenditures modeled in IMPLAN. Figures assume 50yr operational life, consistent with CUP duration. Development Agreement figures assume DA term of 30 years.