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3.11 LAND USE AND PLANNING

This section describes the existing land use conditions on the project site and in the surrounding area and discusses the impacts that would occur with the implementation of the project. Potential land use and planning effects may occur from conflicts with existing or authorized land uses or with applicable land use plans, policies, or regulations. Land use considerations are assessed in this section by comparing the current and proposed land uses, land ownership, and land use designations or limitations of land uses, identifies the criteria bused for determining the significance of land use and planning impacts, and evaluates the potential impacts of the project.

3.11.1 Regulatory Setting

3.11.1.1 Federal

FEDERAL LAND POLICY AND MANAGEMENT ACT OF 1976

The Federal Land Policy and Management Act (FLPMA) establishes public land policy; and guidelines for administration; and provides for the management, protection, development, and enhancement of public lands. FLPMA Section 202 requires the BLM to develop land use plans, also known as resource management plans (RMPs), to guide the BLM's management of public lands. FLPMA Title V, Section 501, establishes the BLM's authority to grant a right-of-way (ROW) for the generation, transmission, and distribution of electrical energy (FLPMA, as amended, 2001). The BLM is responsible for responding to requests regarding the development of energy resources on BLM-administered lands in a manner that balances diverse resource uses and considers the long-term needs for renewable and non-renewable resources for future generations.

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

The National Environmental Policy Act (NEPA) was enacted by the federal government in 1970 (42 United States Code [USC] 4321 et seq.). NEPA applies to most government actions that might affect natural resource management. NEPA requires the federal government to evaluate potential environmental impacts of proposed federal actions. Under NEPA, federal project proponents must consider reasonable alternatives to projects that may lessen the environmental impacts. Environmental review under NEPA can involve three levels of analysis: 1) Categorical Exclusion (CATEX) determination; 2) Environmental Assessment (EA)/Finding of No Significant Impact (FONSI); or 3) EIS.

A federal action may be categorically excluded from a detailed environmental analysis if the federal action does not "individually or cumulatively have a significant effect on the human environment" (40 Code of Federal Regulations [CFR] 1508.4). If a federal agency determines that a CATEX does not apply to, or sufficiently address, a proposed action, that agency must then prepare an EA. The EA determines whether a federal action has the potential to cause significant environmental effects. An EA is typically brief and addresses the need for the project, describes project alternatives, evaluates impacts, and provides reference sources consulted. An EIS is the most rigorous and detailed level of project environmental review and is prepared for proposed major federal actions determined to significantly affect the quality of the human environment. The NEPA environmental review process provides opportunities for public comment, which is often required before decisions about natural resource use can be made.

On December 14, 2007, the project applicant, Soda Mountain Solar, LLC, filed a ROW grant application with the BLM to construct, operate, maintain, and decommission the project (Case File Number CACA-049584). A ROW grant requires compliance with applicable state environmental laws and associated approvals of any required mitigation measures. The BLM issued a Record of Decision (ROD) to approve a revised configuration of the project and the associated amendment to the CDCA Plan in March 2016 (BLM 2016a).

SECTION 368 OF THE ENERGY POLICY ACT OF 2005

Section 368 of the Energy Policy Act of 2005 directed federal agencies to identify corridors for oil, gas, and hydrogen pipelines, and electricity transmission and distribution facilities (energy corridors) on federal land in the 11 contiguous western states. The energy corridors are managed as the preferred locations for the development of energy transportation projects on lands managed by the BLM. Each corridor has a defined centerline, width, and compatible use (underground-only, electric-only, or multi-modal).

The West-wide Energy Corridor (WWEC) Record of Decision (ROD) designated 20 utility corridors in California (BLM 2009). The ROD approved amendments to 92 BLM resource management plans (RMPs) to designate approximately 5,000 miles of Section 368 energy corridors on BLM-administered lands in Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming. The WWEC ROD provides a list of Interagency Operating Procedures (IOPs) intended to provide guidance to avoid or minimize environmental harm from future developments that may occur within the designated corridors.

CALIFORNIA DESERT CONSERVATION AREA PLAN OF 1980, AS AMENDED

The CDCA encompasses 25 million acres in southern California designated by Congress in 1976 through the FLPMA. The BLM manages about 10 million of those acres. Congress directed the BLM to prepare and implement a comprehensive long-range plan for the management, use, development, and protection of public lands within the CDCA. The CDCA Plan is based on the concepts of multiple-use, sustained yield, and maintenance of environmental quality. The CDCA Plan provides overall regional guidance for BLM-administered lands in the CDCA and establishes long-term goals for the protection and use of the California desert (BLM 1999).

The CDCA Plan establishes four multiple-use classes (MUCs); MUC guidelines; and plan elements for specific resources or activities, such as motorized vehicle access, recreation, and vegetation harvesting. The MUCs classify lands as follows: Class C (Controlled) includes areas recommended as suitable for wilderness designation; Class L (Limited Use) lands are managed for generally lower intensity uses for the purpose of protecting sensitive natural, scenic, ecological, and cultural resources; Class M (Moderate Use) provides for a wide variety of present and future uses including mining, livestock grazing, recreation, and energy and utility development; and Class I (Intensive Use) provides for concentrated use of lands and resources to meet human needs, where reasonable protection is provided for sensitive natural and cultural resources. Unclassified lands consist of scattered and isolated parcels that are managed on a case-by-case basis. The Project was located within MUCs L, M, and I.

DESERT RENEWABLE ENERGY CONSERVATION PLAN

In September 2016, BLM adopted the Desert Renewable Energy Conservation Plan (DRECP) Land Use Plan Amendment (LUPA) to the CDCA Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan (BLM 2016b). The DRECP LUPA addresses solar, wind, geothermal energy

generation, and transmission projects on 10.8 million acres of BLM-administered lands in the desert regions of southern California.

The BLM DRECP LUPA establishes several land use classifications, including Development Focus Areas (DFAs), Variance Process Lands (VPLs), Recreation Management Areas, General Public Lands, and various conservation land use designations. In DFAs, renewable energy projects are incentivized and permitting is streamlined. VPLs are carried over from the Western Solar Plan[1] designations and have moderate to low ecological value and uncertain renewable energy potential. Renewable energy projects may be implemented on VPLs, but they must first be evaluated under a variance process and then approved by BLM to proceed through NEPA environmental review. BLM Conservation Areas include National Landscape Conservation System lands, Areas of Critical Environmental Concern (ACECs), and Wildlife Allocations. Recreation Management Areas are designated for recreation actions. This designation includes Extensive Recreation Management Areas, which entail management specifically to address recreation use and demand; and Special Recreation Management Areas, which are high-priority areas for recreation and have unique value and importance for recreation. General Public Lands are BLM-administered lands that do not have any of the above designations.

The DRECP LUPA includes a list of over 200 Conservation and Management Actions (CMAs) that prescribe avoidance, minimization, and compensatory mitigation actions that are applicable to new projects on BLM-administered lands in the DRECP plan area. The CMAs address siting, design, preconstruction, construction, maintenance, implementation, operation, and decommissioning activities of renewable energy projects. The applicability of each CMA to a particular project depends on the BLM land designation(s) at the project area, project type, and resources present at the site.

The majority of the project area is located on DRECP General Public Lands, and the gen-tie route is within an ACEC. The project ROD was issued before the DRECP was adopted, and mitigation requirements for the project as described in the ROD are written as project-specific mitigation measures (MMs) rather than CMAs.

3.11.1.2 State

The project would be located entirely on BLM-administered public lands, therefore state laws, regulations, and policies do not apply. However, while it is not subject to state laws and regulations, the following were reviewed for informational purposes.

CALIFORNIA PLANNING AND ZONING LAW

Under Government Code Sections 6500066499.58, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. These requirements include the inclusion of seven mandatory elements described in the Government Code, including a section on land use. Each of the elements must contain text and descriptions that set forth objectives, principles, standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

[1] The BLM's 2012 Approved Resource Management Plan Amendment/ROD for Solar Energy Development in Six Southwestern States.

CALIFORNIA CODES

There are 29 legal codes enacted by the California State Legislature, which together form the general statutory law for the state. The official codes are maintained by the California Legislative Counsel for the Legislature. Government Code Section 53091(d) states, "Building ordinances of a county or city shall not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water, wastewater, or electrical energy by a local agency."

Section 53091(e) further states, "Zoning ordinances of a county or city shall not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water, or for the production or generation of electrical energy, facilities that are subject to Section 12808.5 of the Public Utilities Code, or electrical substations in an electrical transmission system that receives electricity at less than 100,000 volts. Zoning ordinances of a county or city shall apply to the location or construction of facilities for the storage or transmission of electrical energy by a local agency, if the zoning ordinances make provision for those facilities."

CALIFORNIA PUBLIC UTILITIES COMMISSION

California Public Utilities Commission's (CPUC) review of transmission line applications occurs under two concurrent and parallel processes: (1) environmental review under the California Environmental Quality Act (CEQA); and (2) review of project needs and costs under the Public Utilities Code Section 1001 et seq. and General Order 131-D. Rules relating to the planning and construction of electric generation, transmission/power/distribution line facilities, and substations located in California, state that no electric public utilities will begin construction of any new electric generating plant, or modification, alteration, or addition to an existing electric generating plant, or of electric transmission/power/distribution line facilities, or new, upgraded, or modified substations, exceeding 50 kilovolts (kV), without first complying with the provisions of the General Order.

ASSEMBLY BILL 205

Governor Gavin Newsom signed AB 205 into law on June 30, 2022. This legislative effort significantly expands the California Energy Commission (CEC)'s jurisdiction. AB 205 allows developers to opt into a streamlined environmental review and authorization process for certain solar, wind, and other qualifying clean energy projects under exclusive state jurisdiction. The law also provides new funding for qualifying generation and energy storage facilities. Before AB 205, the CEC's siting authority was limited to thermal power plants with capacities of 50 megawatts (MW) or more. AB 205 expands CEC's siting authority to include non-thermal generating facilities and establishes a new siting certification process for the following eligible facilities:

- Solar photovoltaic (PV) and onshore wind generating facilities with capacities of 50 MW or more.
- Energy storage facilities capable of storing at least 200 MWh of energy.
- Facilities for the manufacture, production, or assembly of energy storage systems, wind systems, solar PV systems, or the components of those systems if the developer certifies the project will require a capital investment of $250 million over a period of five years.
- Transmission lines from the above-mentioned generating or storage facilities to the first point of interconnection.
- Thermal generation facilities with capacities of 50 MW or more that are not powered by fossil or nuclear fuels.

AB 205 gives CEC exclusive siting authority over these eligible projects if a developer submits an application to CEC under this certification process instead of an application for entitlements from the jurisdiction in which the project is located. CEC's siting certification is in lieu of any permit, certificate, or similar document required by any state, local, or regional agency, or federal agency to the extent permitted by federal law. It also supersedes any applicable statute, ordinance, or regulation of any state, local, or regional agency, or federal agency to the extent permitted by federal law, with limited exceptions. AB 205 specifically provides that the certification does not supersede the authority of an exclusive list of agencies: the California State Lands Commission, the California Coastal Commission (CCC), the San Francisco Bay Conservation and Development Commission (BCDC), the California State Water Resources Control Board (SWRCB) or the applicable regional water quality control boards, local air quality management districts, or the California Department of Toxic Substances Control (DTSC).

3.11.1.3 Local

The project would be located entirely on BLM-administered public lands, therefore local laws, regulations, and policies do not apply. However, while it is not subject to the County of San Bernardino land use plans and ordinances, local plans were reviewed for informational purposes.

SAN BERNARDINO COUNTY GENERAL PLAN

The following policies identified in the Land Use Element of the San Bernardino County General Plan are relevant to this analysis (San Bernardino County 2024):

Goal LU-1 Fiscally Sustainable Growth: Growth and development that builds thriving communities, contributes to our Complete County and is fiscally sustainable.

- **Policy LU-1.1 Growth** We support growth and development that is fiscally sustainable for the County. We accommodate growth in the unincorporated county when it benefits existing communities, provides a regional housing option for rural lifestyles, or supports the regional economy.

Goal LU-2 Land Use Mix and Compatibility An arrangement of land uses that balances the lifestyle of existing residents, the needs of future generations, opportunities for commercial and industrial development, and the value of the natural environment.

- **Policy LU-2.3 Compatibility with natural environment** We require that new development is located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity.

The following policies identified in the Renewable Energy and Conservation Element of the San Bernardino County General Plan are relevant to this analysis (San Bernardino County 2024):

Goal RE-2 Renewable Energy Systems The County will be home to diverse and innovative renewable energy systems that provide reliable and affordable energy to our unique Valley, Mountain, and Desert regions

- **Policy RE-2.1** Support solar energy generation, solar water heating, wind energy and bioenergy systems that are consistent with the orientation, siting and environmental compatibility policies of the General Plan.
- **Policy RE-2.2** Promote use of energy storage technologies that are appropriate for the character of the proposed location.
- **Policy RE-2.6** Encourage energy efficiency through appropriate renewable energy systems.

3.11.2 Environmental Setting

3.11.2.1 Project Location

The project is located entirely on federally-owned land managed by the BLM (see Figure 3.11-1). The 2,670-acre project site is located in unincorporated San Bernardino County, California, approximately 7 miles southwest of the community of Baker and 50 miles northeast of the City of Barstow. The project site is located in portions of Sections 1 and 11–14, Township 12 North, Range 7 East; Sections 25 and 36, Township 13 North, Range 7 East; Sections 6, 7, 8, and 18, Township 13 North, Range 8 East, San Bernardino Meridian, California.

San Bernardino County is located on the eastern edge of the Los Angeles metropolitan region. It is the largest county within the continental United States by area, containing three distinct planning regions, that are identified as Valley, Mountain, and Desert. The project site is within the Desert Planning Region, which is the largest of the three regions, encompassing a significant portion of the Mojave Desert and containing approximately 93 percent of the land within San Bernardino County. This region is an assemblage of mountain ranges interspersed with long, broad valleys that often contain dry lakes (San Bernardino County 2024).

3.11.2.2 Existing Conditions

The project would occupy the alluvial valley dividing the northern and southern portions of the Soda Mountains in the Mojave Desert. The project site is composed of rural desert land and is almost entirely undeveloped. Rasor Road, an unimproved BLM public access road, runs from the southwest corner of the site and splits into two branches after approximately 1.4 miles. The Rasor Road fork continues from west to east, to the Rasor OHV recreation area. Arrowhead Trail, the other fork, continues northward through the project site.

3.11.2.3 Surrounding Land Uses

The Rasor Road Services Shell Oil gas station located off I-15 is adjacent to and southwest of the project site. There is a residence adjacent to the gas station, roughly 260 feet southwest of the project boundary. The next closest residential development is approximately 6 miles away in Baker.

Infrastructure currently surrounding the site includes the four-lane I-15, two high-voltage electric transmission lines, an electrical distribution line, wireless cellular telephone towers, two fiber-optic cables, and two fuel pipelines. There are two high-voltage electrical transmission lines to the west of I-15 owned by Southern California Edison (SCE) and the Los Angeles Department of Public Works (LADWP).

BLM-administered areas near the project site include the Soda Mountains Expansion ACEC and Soda Mountains Wilderness Study Area (WSA) to the northwest and Rasor Off-Highway Vehicle (OHV) Recreation Area to the southeast. To the east of the project site is the western boundary of the 1.6-million-acre Mojave National Preserve, which is managed by the National Park Service.

Three military installations are located within a 25-mile radius of the project site. The Naval Air Weapons Station (NAWS) China Lake and the National Training Center Fort Irwin are to the northwest, and Marine Air Ground Task Force Training Command Twentynine Palms is to the southeast.

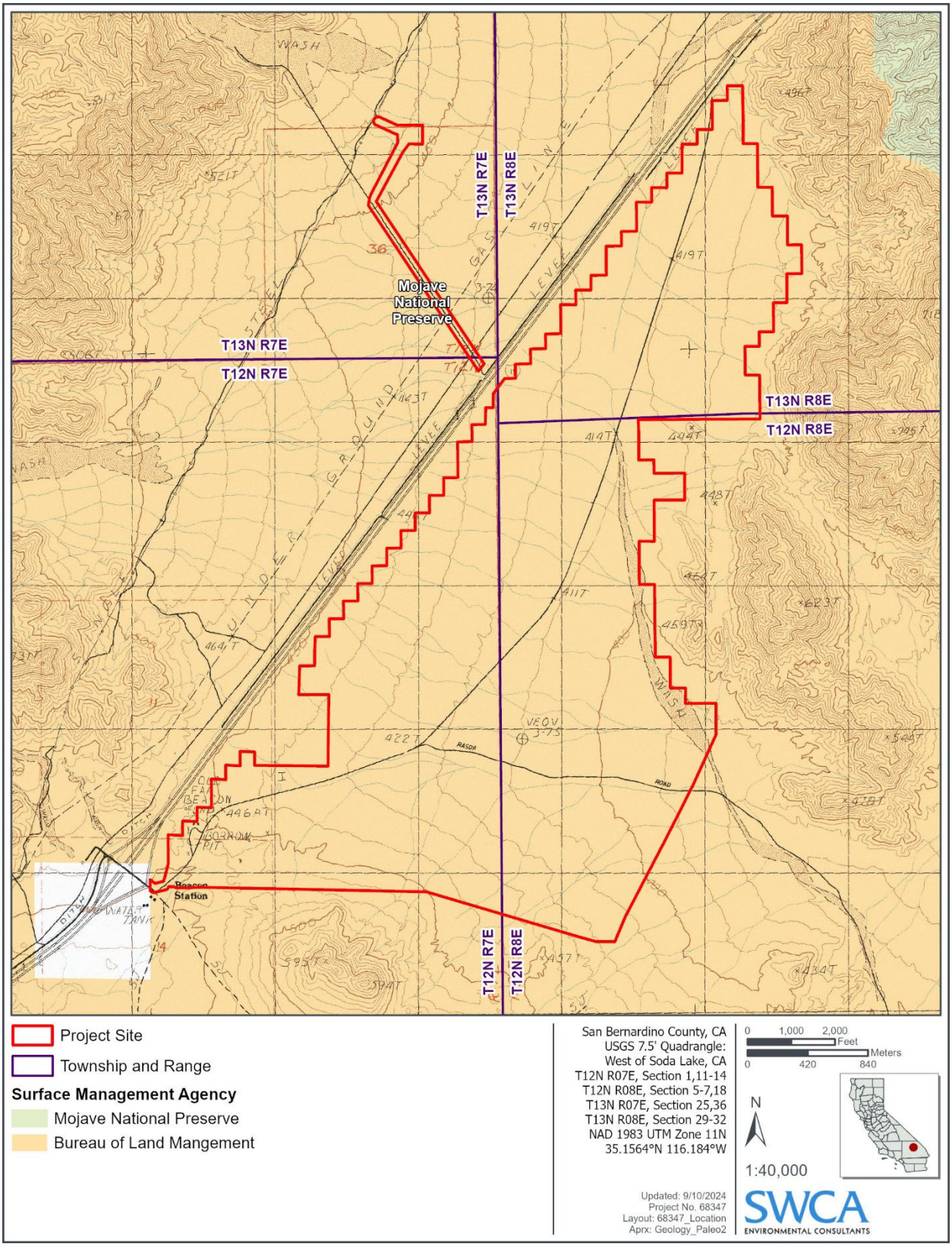

Figure 3.11-1. Project location and management agency.

3.11.2.4 Existing Land Use and Zoning

DESERT RENEWABLE ENERGY CONSERVATION PLAN

The project site is located within the BLM's California Desert District, within the jurisdiction of the BLM Barstow Field Office, and the planning boundary of the CDCA Plan and the DRECP. Within the DRECP, the project is classified as General Public Lands, which do not have a specific land use allocation or designation. These areas are available to renewable energy applications, but do not benefit from permit review streamlining or other incentives.

However, given the BLM signed the ROD for the project in March 2016, before the BLM approved the DRECP LUPA, neither the BLM process for project review under the DRECP nor the CMAs outlined in the DRECP are applicable to this project.

SECTION 368 ENERGY CORRIDOR

As shown in Figure 3.11-2, a 2-mile-wide Section 368 energy corridor (27-225) as designated in Section 368 of the Energy Policy Act of 2005 runs parallel to the east and west of I-15 through the project vicinity, overlapping the project site (BLM 2024).

AREA OF CRITICAL ENVIRONMENTAL CONCERN

The project gen-tie falls within the Soda Mountains Expansion Area of Critical Environmental Concern (ACEC) as designated by the BLM (BLM 2016). ACECs are designated where the BLM has determined that important historical, cultural, scenic, fish and wildlife, or other natural resources occur, and special protection is warranted. In addition, ACECs may be designated for safety in areas with natural hazards. The Soda Mountains Expansion ACEC abuts the northern edge of I-15 and encompasses 16,720 acres between I-15 and the Soda Mountain Wilderness Study area. It was designated to protect plant and wildlife connectivity between surrounding wilderness and wilderness study areas.

Renewable energy development is not compatible with ACEC unit values and criteria. However, transmission activities are allowed in ACECs within the DRECP, as described in CMA ACEC-LANDS-1 (BLM 2016b). Disturbance within each ACEC in the DRECP is limited to a specified percentage of the total ACEC area; for the Soda Mountains Expansion ACEC, the disturbance is capped at 1%.

The Soda Mountains Expansion ACEC was designated as a part of the DRECP LUPA in September 2016 (BLM 2016b), after the project ROD was issued in March 2016. The project is consistent with that described in the project ROD, and therefore the project would not need to conform to the CMAs outlined in the DRECP that would otherwise apply to activities within this ACEC.

The ACEC is the only federal, state, or local designated conservation area within or directly adjacent to the project site. Within 10 miles, there is no USFWS-designated critical habitat for ESA-listed species, no USFWS-authorized habitat conservation plans, and no CDFW natural community conservation plans.

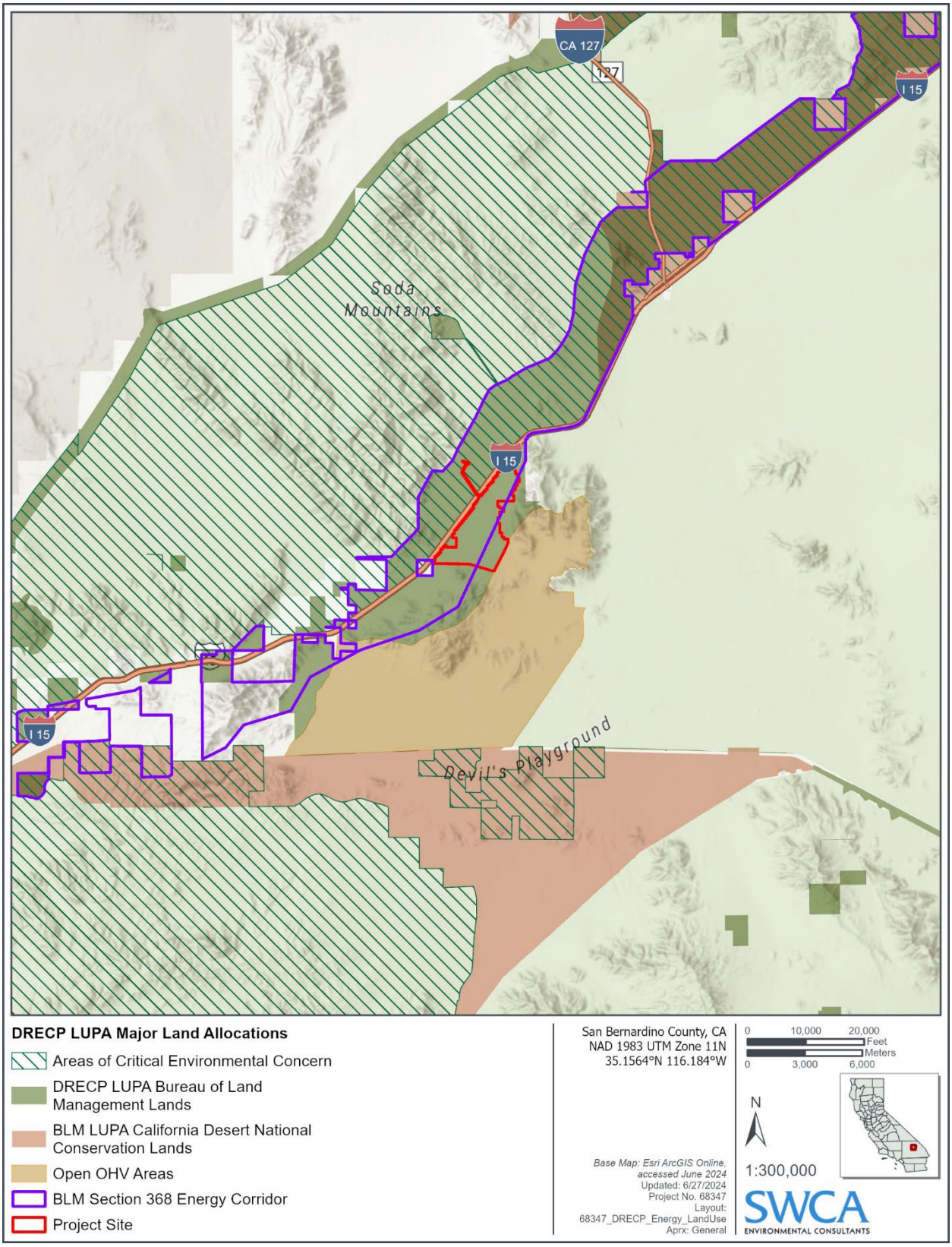

Figure 3.11-2. DRECP Land Use Allocations.

3.11.2.5 Recent Proposed Zone Changes, General Plan Amendments, Discretionary Reviews

There are no recent or proposed zone changes and/or general plan amendments noticed by an elected or appointed board, commission, or similar entity at the state or local level. In addition, there are no discretionary reviews by public agencies initiated or completed within 18 months at the state or local level.

3.11.3 Impact Analysis

3.11.3.1 Thresholds of Significance

The determinations of significance of project impacts are based on applicable policies, regulations, goals, and guidelines defined by CEQA. Specifically, the project would be considered to have a significant effect on land use and planning if the effects exceed the significance criteria described below:

1. Physically divide an established community.
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Both of these thresholds are discussed under Section 3.11.4, Impact Assessment, below.

3.11.3.2 Methodology

Evaluation of potential land use conflicts that may result from the project was based on a review of relevant land use planning documents and of the proposed solar facilities sites and surrounding area. The focus of the land use analysis is on land use conflicts that would result from the implementation of the project. Land use conflicts are identified and evaluated based on existing or authorized land uses, land uses proposed as part of the project, land use designations, and standards and policies related to land use.

3.11.3.3 Applicant-Proposed Measures

The Applicant has identified and committed to implement the following APMs as part of the proposed Projects to avoid or substantially lessen potentially significant impacts to land use and planning, to the extent feasible. The APMs, where applicable, are discussed in the impact analysis section below. These measures include the following:

- **APM LU-1:** Prior to the start of construction, the Applicant shall provide cadastral survey data to the BLM for all sections within the requested ROW. All section corners shall be surveyed and monumented, and a record map completed and filed with San Bernardino County to ensure the descriptions for all lands within the Right-of-Way are recorded correctly.
- **APM LU-2:** Prior to issuance of the Notice-To-Proceed, the Applicant shall provide 100 percent design drawings to the BLM for review and approval.

3.11.3.4 Impact Assessment

Impact LUP-1: Would the project physically divide an established community? (Less than Significant)

The project is within an undeveloped rural area and located entirely on federally owned land managed by the BLM. The 2,670-acre project site is located in a sparsely populated area and the nearest community is Baker, located approximately 7 miles away. The project site is bounded directly to the west by I-15, to the east by the Mojave National Preserve, and the Rasor OHV recreation area at the southeast corner.

The project includes the development of a solar facility and gen-tie line. The gen-tie line would connect the collector lines from the substation to the project switchyard by boring under I-15 within an existing Caltrans culvert. The project would not negatively impact current operations of the I-15. The project would not result in the construction of new access routes that have the potential to divide existing communities, nor does the project propose the elimination of existing area roadways that could have the potential to isolate uses or create a division between existing uses. Therefore, impacts would be **less than significant**.

Impact LUP-2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Less than Significant)

As part of the Opt-In Application process, the CEC would review the project for consistency with local land use plans, policies, and regulations. AB 205 (Chapter 61, § 2022) expands CEC's authority under the Warren-Alquist Act to establish a new certification program for eligible non-fossil-fueled power plants and related facilities to optionally seek certification from the CEC.

The project is located entirely on federally owned land within the planning boundary of the CDCA Plan and the DRECP. Given the project is on federal land, it is not subject to local land use regulations and policies. As demonstrated in Table 3.11-1 the project, including the solar facility and gen-tie line would be consistent with the CDCA as amended by the DRECP LUPA, and its CMAs. Additionally, the project is also located within the 27-225 energy corridor designated by the WWEC ROD (BLM 2009). As demonstrated in Table 3.11-2 the project, including the solar facility and gen-tie line would be consistent with the WWEC, and its IOPs.

As demonstrated below in Table 3.11-1 Table 3.11-2, the project would not have the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be **less than significant**.

Table 3.11-1. Project Consistency with Appliable CMAs from the DRECP LUPA

DRECP CMA	CMA Summary	Consistency Determination
LUPA-Wide CMAs		
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 vegetation types, rare alliances, and special features (e.g., Aeolian sand transport resources, Joshua tree, microphyll woodlands, carbon sequestration characteristics, seeps, climate refugia)f present using the most current information, data sources, and tools (e.g., DRECP	**Consistent.** The Applicant would comply with this CMA.

DRECP CMA	CMA Summary	Consistency Determination
	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. …	
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.	**Consistent.** The Applicant would comply with this CMA.
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: … ▪ The edge of each of the DRECP 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). ▪ The edge of the mapped riparian vegetation or FEMA 100-year floodplain, whichever is greater, for the Mojave River. ▪ The edge of the vegetation extent for specified focus and BLM sensitive plant species. ▪ The edge of suitable habitat or active nest substrates for the appropriate focus and BLM Special-Status Species.	**Consistent.** The Applicant would comply with this CMA.
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. Species-specific seasonal restriction dates are described in the applicable CMAs….	**Consistent.** The Applicant would comply with this CMA.
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. …	**Consistent.** The Applicant would comply with this CMA.
LUPA-BIO-6	Subsidized predator standards, approved by BLM, in coordination with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (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: ▪ 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 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. ▪ …	**Consistent**. The project would implement the following measure listed in Section 3.3, Biological Resources: **APM BIO-34:** A Raven Monitoring and Control Plan shall be prepared consistent with the most current USFWS-approved raven management guidelines. The purpose of the plan is to avoid any project-related increases in raven numbers during construction, operation, and decommissioning. The Raven Monitoring and Control Plan shall be submitted to CEC, BLM, CDFW, and USFWS for approval at least 30 days prior to the start of construction. Therefore, the project would comply with this CMA.

DRECP CMA	CMA Summary	Consistency Determination
LUPA-BIO-7	Where vegetation types or focus or BLM Special-Status 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) 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 as appropriate, summarized below: …	**Consistent.** The Applicant would comply with this CMA.
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: ▪ …	**Consistent.** The Applicant would comply with this CMA.
LUPA-BIO-9	Implement the following general LUPA CMA for water and wetland dependent resources: ▪ 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: … ▪ 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. …	**Consistent.** The Applicant would comply with this CMA.
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: …	**Consistent.** The Applicant would comply with this CMA.
LUPA-BIO-11	Implement the following CMAs for controlling nuisance animals and invasive species: …	**Consistent.** The Applicant would comply with this CMA.
LUPA-BIO-12	For activities that may impact focus or BLM Special-Status Species, implement the following LUPA CMA for noise: ▪ 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. ▪ 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. ▪ Use noise controls on standard construction equipment including mufflers to reduce noise.	**Consistent.** The Applicant would comply with this CMA.
LUPA-BIO-13	Implement the following CMA for project siting and design: 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). ▪ …	**Consistent.** The Applicant would comply with this CMA.
LUPA-BIO-14	Implement the following general standard practices to protect Focus and BLM Special-Status Species: ▪ …	**Consistent.** The Applicant would comply with this CMA.
LUPA-BIO-15	Use state-of-the-art 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.	**Consistent.** The Applicant would comply with this CMA.

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LUPA-BIO-16	For activities that may impact focus and BLM sensitive birds, protected by the Endangered Species Act (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. ▪ …	**Consistent.** The Applicant would comply with this CMA.
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: ▪ …	**Consistent.** The Applicant would comply with this CMA.
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. ▪ …	**Not applicable**. Those vegetation types are not present in the project area.
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").	**Not applicable.** Those vegetation types are not present in the project area.
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. ▪ …	**Not applicable.** Those vegetation types are not present in the project area.
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). …	**Not applicable.** No federally listed fish species or their habitat has been documented in the project area.
LUPA-BIO-RIPWET-5	Site and design activities to fully avoid operational impacts to existing and newly discovered occurrences of federally listed fish species.	**Not applicable.** No federally listed fish species or their habitat has been documented in the project area.
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).	**Not applicable**. Habitat for the Tehachapi Slender Salamander is not present in the project area.
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. …	**Not applicable.** Habitat for the Tehachapi Slender Salamander is not present in the project area.
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	**Not applicable.** Sand dune vegetation types and Aeolian sand transport corridors are not present in the project area.

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	resource(s) for the activity-specific environmental analysis to determine: …	
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: …	**Not applicable.** Sand dune vegetation types and Aeolian sand transport corridors are not present in the project area.
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.	**Not applicable.** Sand dune vegetation types and Aeolian sand transport corridors are not present in the project area.
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. 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	**Not applicable.** Sand dune vegetation types and Aeolian sand transport corridors are not present in the project area.
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.	**Not applicable.** Sand dune vegetation types and Aeolian sand transport corridors are not present in the project area.
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.	**Not applicable.** Project is not sited within 500 feet of any occupied maternity roost.
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).	**Not applicable.** No existing mines are within the project area.
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.	**Consistent.** The Applicant would 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)	**Consistent.** The Applicant would comply with this CMA.
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. …	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA if the listed special vegetation features are found in the project area.
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.	**Consistent.** The Applicant would comply with this CMA if yucca clones

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		larger than 3 meters in diameter are documented in the project area.
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.	**Consistent.** The Applicant would comply with this CMA if creosote bush rings larger than 5 meters in diameter are documented in the project area.
LUPA-BIO-SVF-4	Saguaro cactus should be managed in such a way as to provide longterm habitat for the California populations not just individual plants, except in DFAs.	**Consistent.** The Applicant would comply with this CMA.
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).	**Consistent.** The Applicant would comply with this CMA.
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).	**Not applicable.** Microphyll woodlands are not present in the project area.
LUPA-BIO-SVF-7	Crucifixion thorn stands: (Castela emoryi Shrubland Special Stands) Crucifixion thorn stands with greater than 100 individuals will be avoided.	**Consistent.** The Applicant would comply with this CMA if Crucifixion thorn stands with greater than 100 individuals are found in the project area.
LUPA-BIO-VEG-1	Management of cactus, yucca, and other succulents will comply with current up-to-date BLM policy.	**Consistent.** The Applicant would comply with this CMA if cactus, yucca, and other succulents are found in the project area.
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.	**Consistent.** Dead and downed woody vegetation would be left in place as appropriate. Therefore, the Applicant would comply with this CMA.
LUPA-BIO-VEG-3	Allow for the collection of plant material consistent with the maintenance of natural ecosystem processes.	**Consistent.** The Applicant would allow for the collection of plant materials when necessary. The Applicant would comply with this CMA.
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.	**Not applicable.** The project is not in the Bishop Field Office.
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.	**Consistent.** The Applicant would comply with this CMA if succulents, cacti and succulents or BLM Sensitive plants require salvage and transplantation from the project area.
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.	**Not applicable.** The project is not located in the designated desert tortoise linkages outlined in Appendix D of the DRCEP.
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	**Not applicable.** The project is not located in desert tortoise conservation

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	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. …	areas outlined in Appendix D of the DRCEP.
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.	**Consistent.** The Applicant would 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. …	**Not applicable.** The project is not located in desert tortoise survey areas outlined in Appendix D of the DRCEP.
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. …	**Not applicable.** The project is not located in desert tortoise survey areas outlined in Appendix D of the DRCEP.
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.	**Not applicable.** The project is not located in desert tortoise survey areas outlined in Appendix D of the DRCEP.
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.	**Consistent.** The Applicant would 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.	**Consistent.** The Applicant would 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.	**Not applicable.** The project is not located in desert tortoise survey areas outlined in Appendix D of the DRCEP.
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, preconstruction, construction, operation, and decommissioning; ensure that current or potential linkages and habitat quality are maintained; reduce mortality; minimize other DRECP BLM Land Use Plan Amendment 115 September 2016 adverse impacts during operation; and ensure that activities have a neutral or positive effect on the species.	**Not applicable.** The project is not located within the range of the Flat-tailed Horned Lizard**.**
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).	**Not applicable.** Bendire's thrasher has not been documented in the project area.

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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.	**Consistent.** The Applicant would 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.	**Consistent.** The Applicant would comply with this CMA.
LUPA-BIO-IFS-14	Activity-specific active translocation of burrowing owls may be considered, in coordination with CDFW.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Not applicable.** The project is not within the range of the California Condor.
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.	**Not applicable.** The project is not within the range of the California Condor.
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 storage on sites for leaks and puddles. Standing fluid will be remediated without unnecessary delay.	**Not applicable.** The project is not within the range of the California Condor.
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.	**Not applicable.** The project is not within the range of the California Condor.
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: …	**Not applicable.** The project is not within the range of the California Condor.
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	**Not applicable.** The project is not within the range of the California Condor.

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	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.	
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.	**Not applicable.** The project is not within the range of the California Condor.
LUPA-BIO-IFS-24	Provide protection from loss and harassment of active golden eagle nests through the following actions: ▪ 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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would 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 preproject golden eagle surveys.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
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: …	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
LUPA-BIO-IFS-30	For activities where ongoing take of golden eagles is anticipated, develop advanced conservation practices per USFWS Eagle Conservation Plan Guidance.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
LUPA-BIO-IFS-32	Avoid use of rodenticides and insecticides within five miles of active Swainson's hawk nest.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.

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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.	**Not applicable.** Mohave ground squirrel habitat is not present in the project area.
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. …	**Not applicable.** Mohave ground squirrel habitat is not present in the project area.
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).	**Not applicable.** Mohave ground squirrel habitat is not present in the project area.
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.	**Not applicable.** Mohave ground squirrel habitat is not present in the project area.
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. …	**Not applicable.** Mohave ground squirrel habitat is not present in the project area.
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. …	**Not applicable.** Mohave ground squirrel habitat is not present in the project area.
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.	**Not applicable.** Mohave ground squirrel habitat is not present in the project area.
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.	**Not applicable.** Mohave ground squirrel habitat is not present in the project area.
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 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….	**Consistent.** The Applicant would 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	**Consistent.** The Applicant would comply with this CMA.

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	same "bird years" metric as described in Appendix D) is used to estimate the necessary compensation fee. …	
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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
LUPA-AIR-1:	All activities must meet the following requirements: ▪ Applicable National Ambient Air Quality Standards (Section 109) ▪ State Implementation Plans (Section 110) …	**Consistent.** The Applicant would comply with this CMA.
LUPA-AIR-2:	Because project authorizations are a federal undertaking, air quality standards for fugitive dust may not exceed local standards and requirements.	**Consistent.** The Applicant would 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 Action (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 PM10 and PM2.5 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.	**Consistent.** Impacts to air quality would be less than significant. See Section 3.3 Air Quality.
LUPA-AIR-4:	Because fugitive dust is the number one source of PM10 and PM2.5 pollution 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. …	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Not applicable.** These significant linear features are not present in the project area.
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.	**Not applicable.** These significant linear features are not present in the project area.

DRECP CMA	CMA Summary	Consistency Determination
LUPA-CTTM-4	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.	**Consistent.** The Applicant would comply with this CMA.
LUPA-CTTM-4	Manage Back Country Byways as a component of BLM Recreation and Travel and Transportation Management program.	**Not applicable.** No Back Country Byways are present in the project area.
LUPA-CTTM-4	Manage Recreation Facilities consistent with the objectives for the recreation management areas and facilities (see also Section II.4.2.1.10).	**Consistent.** The project would implement the following measure listed in Section 3.16, Recreation: **APM REC-1:** Travel Management Area Maps for the project site showing open, closed, and limited travel routes and open off-road vehicles areas shall be updated and printed by the applicant for posting by the BLM during each phase of the project when the status or location of routes and/or open areas changes as a result of project construction, operation and maintenance, and/or decommissioning. These notices and signs shall clearly describe which routes and open areas will be closed temporarily or permanently. Therefore, the project would comply with this CMA.
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).	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area. Construction activities associated with the project would not have an effect to historic properties under Section 106 of the National Historic Preservation Act and would not result in any direct or indirect impacts to known historical resources under CEQA. See Section 3.5, Cultural Resources.
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.	**Consistent.** The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area. Construction activities associated with the project would not have an effect to historic properties under Section 106 of the National Historic Preservation Act and would not result in any direct or indirect impacts to known historical resources under CEQA. See Section 3.5, Cultural Resources.
LUPA-CUL-3	Identify places of traditional cultural and religious importance to federally recognized Tribes and maintain access to these locations for traditional use.	**Consistent**. The project would not eliminate access to any locations for traditional use. See Section 3.18, Tribal Cultural Resources
LUPA-CUL-4	Design activities to minimize impacts on cultural resources including places of traditional cultural and religious importance to federally recognized Tribes.	**Consistent.** The Applicant would comply with this CMA.

DRECP CMA	CMA Summary	Consistency Determination
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.	**Consistent.** The project would implement the following measure listed in Section 3.16, Recreation: **APM REC-1:** Travel Management Area Maps for the project site showing open, closed, and limited travel routes and open off-road vehicles areas shall be updated and printed by the applicant for posting by the BLM during each phase of the project when the status or location of routes and/or open areas changes as a result of project construction, operation and maintenance, and/or decommissioning. These notices and signs shall clearly describe which routes and open areas will be closed temporarily or permanently. Therefore, the project would comply with this CMA.
LUPA-CUL-6	Develop partnerships to assist in the training of groups and individuals to participate in site stewardship programs.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area. See Section 3.5, Cultural Resources.
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.).	**Consistent.** The Applicant would comply with this CMA.
LUPA-CUL-8	Conduct regular contact and consultation with federally recognized Tribes and individuals, consistent with statute, regulation and policy.	**Consistent.** The Applicant would 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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Not Applicable.** These vegetation types are not present in the project area.
LUPA-CUL-11	Promote and protect desert microphyll woodland vegetation type/communities to ensure Native American cultural values are maintained.	**Not Applicable.** These vegetation types are not present in the project area.
LUPA-LANDS-1	Identify acquired lands as right-of-way exclusion areas when development is incompatible with the purpose of the acquisition.	**Not applicable.** Land acquisition is not part of the proposed project.
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.	**Not applicable.** Land acquisition is not part of the proposed project.
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	**Not applicable**. The project area is not located in land use allocations where renewable energy and ancillary facilities are not allowed.

DRECP CMA	CMA Summary	Consistency Determination
	Ocotillo Wells SRMA (refer to the Ocotillo Wells SRMA Special Unit Management Plan in Appendix C).	
LUPA-LANDS-4	Nonfederal lands within the boundaries of BLM LUPA land use allocations are not affected by the LUPA.	**Not applicable.** The project area is located on BLM-managed land.
LUPA-LANDS-5	The MUCs used to determine land tenure in the CDCA Plan will be replaced by areas listed in the CMAs below.	**Not applicable.** The project area is located on BLM-managed land.
LUPA-LANDS-6	Any activities on Catellus Agreement lands will be consistent with deed restrictions.	**Not applicable.** The project area is not located on Catellus Agreement lands.
LUPA-LANDS-7	Any activities on Catellus Agreement lands will be subject to the approval of the California State Director.	**Not applicable.** The project area 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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Not applicable**. Land exchanges are not part of the proposed 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.	**Not applicable**. Land exchanges are not part of the proposed project.
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.	**Not applicable**. The project area is not located within any grazing allotments. See Section 3.2, Agriculture and Forestry Resources.
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).	**Not applicable**. The project area is not located within any grazing allotments. See Section 3.2, Agriculture and Forestry Resources.
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.	**Not applicable**. The project area is not located within any grazing allotments. See Section 3.2, Agriculture and Forestry Resources.
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.	**Not applicable**. The project area is not located within any grazing allotments. See Section 3.2, Agriculture and Forestry Resources.
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.	**Not applicable**. The project area is not located within any grazing allotments. See Section 3.2, Agriculture and Forestry Resources.

DRECP CMA	CMA Summary	Consistency Determination
LUPA-LIVE-6	Complete the process for approving rangeland health standards and guidelines for the CDCA Plan (NEMO, WEMO, NECO and PSSCRMP).	**Not applicable**. The project area is not located within any grazing allotments. See Section 3.2, Agriculture and Forestry Resources.
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.	**Not applicable**. The project area is not located within any grazing allotments. See Section 3.2, Agriculture and Forestry Resources.
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.	**Not applicable**. The project area is not located within any grazing allotments. See Section 3.2, Agriculture and Forestry Resources.
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.	**Not applicable**. The project area is not located within any grazing allotments. See Section 3.2, Agriculture and Forestry Resources.
LUPA-MIN-1	High Potential Mineral Areas (identified in CA GEM data) …	**Not applicable**. This CMA applies to mineral or energy projects that fall under locatable, salable, solid leasable and geothermal minerals. See Section 3.12, Mineral Resources.
LUPA-MIN-2	Existing Mineral/Energy Operations …	**Not applicable**. This CMA applies to mineral or energy projects that fall under locatable, salable, solid leasable and geothermal minerals. See Section 3.12, Mineral Resources.
LUPA-MIN-3	Existing High Priority Mineral/Energy Operations Exclusion Areas …	**Not applicable**. This CMA applies to mineral or energy projects that fall under locatable, salable, solid leasable and geothermal minerals. See Section 3.12, Mineral Resources.
LUPA-MIN-4	Access to Existing Operations …	**Not applicable**. There are no existing mineral operations in the project requiring access. See Section 3.12, Mineral Resources.
LUPA-MIN-5	Areas Located Outside Identified Mineral Areas ▪ 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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.12, Mineral Resources.
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.	**Not applicable**. This CMA applies to mineral or energy projects that fall under locatable, salable, solid leasable and geothermal minerals. See Section 3.12, Mineral Resources.

DRECP CMA	CMA Summary	Consistency Determination
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.	**Not applicable.** The Nadeau NRT Management Corridor is not present in the project area.
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 centerlineof the route.	**Not applicable.** The Nadeau NRT Management Corridor is not present in the project area.
LUPA-PALEO-1	If not previously available, prepare paleontological sensitivity maps consistent with the Potential Fossil Yield Classification for activities prior to NEPA analysis.	**Consistent.** Paleontological desktop and field surveys were completed for the project in 2023, including PFYC mapping. In doing so, the Applicant is in compliance with this CMA. See Section 3.21, Paleontological Resources.
LUPA-PALEO-2	Incorporate all guidance provided by the Paleontological Resources Protection Act.	**Consistent.** Paleontological desktop and field surveys were completed for the project in 2023, including PFYC mapping. In doing so, the Applicant is in compliance with this CMA. See Section 3.21, Paleontological Resources.
LUPA-PALEO-3	Ensure proper data recovery of significant paleontological resources where adverse impacts cannot be avoided or otherwise mitigated.	**Consistent.** The Applicant would comply with this CMA. See Section 3.21, Paleontological Resources.
LUPA-PALEO-4	Paleontological surveys and construction monitors are required for ground disturbing activities that require an EIS.	**Consistent.** The Applicant would comply with this CMA. See Section 3.21, Paleontological Resources.
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.	**Consistent.** The project would not result in significant impacts to the Rasor Road Off-Highway Vehicle Area. See Section 3.16, Recreation.
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.	**Consistent.** The project would not result in significant impacts to the Rasor Road Off-Highway Vehicle Area. See Section 3.16, Recreation.
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).	**Consistent.** The project would not result in significant impacts to the Rasor Road Off-Highway Vehicle Area. See Section 3.16, 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.	**Consistent.** The project would not result in significant impacts to the Rasor Road Off-Highway Vehicle Area. See Section 3.16, Recreation.
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.	**Consistent.** The project would not result in significant impacts to the Rasor Road Off-Highway Vehicle Area. See Section 3.16, Recreation.
LUPA-REC-6	Limit signage to that necessary for recreation facility/area identification, interpretation, education and safety/regulatory enforcement.	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.

DRECP CMA	CMA Summary	Consistency Determination
LUPA-REC-7	Refer to local RMPs, RMP amendments, and activity level planning for specially designated areas for Vehicular Stopping, Parking, and Camping limitations.	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
LUPA-REC-8	Provide on-going maintenance of recreation and conservation facilities, interpretive and regulatory signs, roads, and trails.	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.2, Biological Resources and Section 3.10 Hydrology and Water Quality.
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 resources goals and objectives to protect these resources. Specific require- ments, 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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.7, Geology and Soils, and Section 3.10 Hydrology and Water Quality.
LUPA-SW-3	Where a seeming conflict between CMAs within or between resources arises, the CMA(s) resulting in the most resource protection apply.	**Consistent.** The Applicant would comply with this CMA. See Section 3.7, Geology and Soils, and Section 3.10 Hydrology and Water Quality.
LUPA-SW-4	Nothing in the “Exceptions” below applies to or takes precedence over any of the CMAs for biological resources. …	**Consistent.** The Applicant would comply with this CMA. See Section 3.7, Geology and Soils, and Section 3.10 Hydrology and Water Quality.
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: ▪ 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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.7, Geology and Soils, and Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.7, Geology and Soils, and Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.7, Geology and Soils, and Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.7, Geology and Soils, and Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.7, Geology and Soils, and Section 3.10 Hydrology and Water Quality.

DRECP CMA	CMA Summary	Consistency Determination
	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 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.	
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.7, Geology and Soils, and Section 3.10 Hydrology and Water Quality.
LUPA-SW-11	Where possible, side casting shall be avoided where road construction requires cut- and-fill procedures.	**Consistent.** The Applicant would comply with this CMA. See Section 3.7, Geology and Soils, and Section 3.10 Hydrology and Water Quality.
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).	**Consistent.** The Applicant would comply with this CMA.
LUPA-SW-13	BLM will manage all riparian areas to be maintained at, or brought to, proper functioning condition.	**Consistent.** The Applicant would comply with this CMA.
LUPA-SW-14	All relevant requirements of Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands) will be complied with.	**Consistent.** The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.
LUPA-SW-15	Surface water diversion for beneficial use will not occur absent a state water right.	**Consistent.** The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.
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. …	**Consistent.** The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.
LUPA-SW-19	Water flow meters shall be installed on all extraction wells permitted by BLM.	**Consistent.** The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.

DRECP CMA	CMA Summary	Consistency Determination
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.
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. …	**Consistent.** A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
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. …	**Consistent.** A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
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.…	**Consistent.** The Applicant would comply with this CMA. A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
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.	**Consistent.** The Applicant would comply with this CMA. A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
LUPA-SW-30	Activities shall comply with local requirements for any long term or short term domestic water use and wastewater treatment.	**Consistent.** The Applicant would comply with this CMA. A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.

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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.	**Consistent.** The Applicant would comply with this CMA. A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
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….	**Not applicable**. The project is not located in the Colorado River Hydrologic Basin.
LUPA-SW-33	Stipulations for groundwater development in the proximity of Devils Hole …	**Not applicable.** The project is not located near Devils Hole.
LUPA-SW-34	Stipulations for groundwater development in the Calvada Springs/South Pahrump Valley area …	**Not applicable.** The project is not located in the Calvada Springs/South 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 groundwater 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 potential 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	**Consistent.** The Applicant would comply with this CMA. A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
LUPA-VRM-1	Manage Visual Resources in accordance with the VRM classes shown on Figure 9.	**Consistent**. The project area is located in VRM Class III. Ongoing coordination between the applicant and BLM is occurring to address conflicts with the BLM VRM Class III objectives, among other considerations since the issuance of the project ROD. Concurrent BLM approval processes, potentially including an applicable plan amendment, will ensure the project conforms with all applicable BLM land use plans, including the visual provisions of DRECP LUPA. Refer to Section 5.2.2 of the Visual Resources Technical Report (Appendix B).
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.	**Consistent**. The project area is located in VRM Class III. Ongoing coordination between the applicant and BLM is occurring to address conflicts with the BLM VRM Class III objectives, among other considerations since the issuance of the project ROD. Concurrent BLM approval processes, potentially including an applicable plan amendment, will ensure the project conforms with all applicable BLM land use plans, including the visual provisions of DRECP LUPA. Refer to Section 5.2.2 of the Visual Resources Technical Report (Appendix B).
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. …	**Consistent**. The project area is located in VRM Class III. Ongoing coordination between the applicant and BLM is occurring to address conflicts with the BLM VRM Class III objectives, among

DRECP CMA	CMA Summary	Consistency Determination
		other considerations since the issuance of the project ROD. Concurrent BLM approval processes, potentially including an applicable plan amendment, will ensure the project conforms with all applicable BLM land use plans, including the visual provisions of DRECP LUPA. Refer to Section 5.2.2 of the Visual Resources Technical Report (Appendix B).
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.	**Not applicable**. The project is not located in an area managed for wilderness characteristics.
LUPA-WC-2	Employ avoidance measures as described under DFAs and approved transmission corridors.	**Not applicable**. The project is not located in an area managed for wilderness characteristics.
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.	**Not applicable**. The project is not located in an area managed for wilderness characteristics.
LUPA-WC-4	For areas identified to be managed to protect wilderness characteristics, identified in Figure 7, the following CMAs are required: …	**Not applicable**. The project is not located in an area managed for wilderness characteristics.
LUPA-WC-5	Manage the following Wilderness Inventory Units to protect wilderness characteristics: …	**Not applicable.** The project is not located in an area managed for wilderness characteristics.
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.	**Consistent.** The Applicant would 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.	**Consistent.** The Applicant would 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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
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: …	**Consistent**. This is covered through the existing cost recovery agreement.
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	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area.

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	regional impacts of the project. Refer to the NHPA Programmatic Agreement for details regarding the mitigation fee.	There are no cumulative or indirect adverse effects to historic properties
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.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area.
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.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area.
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.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area.
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.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area.
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 utilityscale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement.	**Consistent.** The Applicant would comply with this CMA.
LUPA-TRANS-WC-1	Allow transmission activities in areas inventoried and identified as lands with wilderness characteristics.	**Not applicable.** The project is not located in an area managed for 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. …	**Not applicable.** The project is not located in an area managed for wilderness characteristics.
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). …	**Consistent.** The Applicant would comply with this CMA.
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. …	**Not applicable**. The project is not a BLM-initiated activity.
Ecological and Cultural Conservation CMAs		
CONS-BIO-DUNE-1	All long-term structures will be setback 0.25 mile from Aeolian corridors and Mojave fringe-toed lizard suitable habitat.	**Not applicable.** The project area is not located in these corridors or habitat types.

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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….	**Not applicable**. The project area is not located in these corridors.
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). …	**Consistent.** The Applicant would comply with this CMA.
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.	**Not applicable**. This project will not result in the long-term removal of desert tortoise habitat.
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 preactivity survey protocol.	**Not applicable**. This project will not result in the long-term removal of desert tortoise habitat.
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. …	**Consistent.** The Applicant would comply with this CMA.
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.	**Not applicable**. The project is not in the vicinity of Corn Springs and Milpitas Wash.
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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
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. …	**Not applicable.** The project is not located within a grazing allotment and no domestic livestock are transported or trailed through the area. See Section 3.2, Agriculture and Forestry Resources.
CONS-BIO-IFS-8	To reduce the impact on bighorn sheep from domestic livestock in grazing allotments, BLM will: …	**Not applicable.** The project is not located within a grazing allotment and no domestic livestock are transported or trailed through the area. See Section 3.2, Agriculture and Forestry Resources.
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 conservation and management. Compatible land uses are those described in the BLM LUPA for ACECs where Mohave ground squirrel occur.	**Not applicable.** Mohave ground squirrel habitat has not been identified in the project area.

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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.	**Not applicable.** Mohave ground squirrel habitat has bot been identified in the project area.
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 objectives, 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).	**Consistent.** The Applicant would comply with this CMA.
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).	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
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.	**Consistent.** The Applicant would comply with this CMA.
ACECs CMAs		
ACEC-CUL-1	Survey, identify and record new cultural resources within ACEC boundaries prioritizing ACECs where the relevant and important criteria include cultural resources.	**Consistent.** The Applicant would comply with this CMA.
ACEC-CUL-2	Update records for existing cultural resources within ACECs, prioritizing ACECs where the relevant and important criteria include cultural resources.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
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.	**Consistent.** The Applicant would comply with this CMA.
ACEC-CUL-5	Identify, develop or incorporate standard protection measures and best management practices to address threats.	**Consistent.** The Applicant would comply with this CMA.
ACEC-CUL-6	Where specific threats are identified, implement protection measures consistent with agency NHPA Section 106 responsibilities	**Consistent.** The Applicant would comply with this CMA.
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). …	**Consistent**. Construction and operation of the project gen-tie would impact up to 36 acres of the Soda Mountains Expansion ACEC, approximately 0.22% of its total area. The gen-tie construction would temporarily disrupt wildlife activity in the area, and

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		temporarily and permanently remove some habitat for plants and wildlife. The project, including the solar facility and gen-tie line would be consistent with the CMAs for ground disturbance within the ACEC.
ACEC-DIST-2	Specifically, the ground disturbance caps would be implemented as a limitation and objective using the following process: …	**Consistent**. Construction and operation of the project gen-tie would impact up to 36 acres of the Soda Mountains Expansion ACEC, approximately 0.22% of its total area. The gen-tie construction would temporarily disrupt wildlife activity in the area, and temporarily and permanently remove some habitat for plants and wildlife. The project, including the solar facility and gen-tie line would be consistent with the CMAs for ground disturbance within the ACEC.
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.	**Consistent**. The transmission line is the only proposed activity in the Soda Mountain Expansion ACEC. The Applicant would comply with this CMA.
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.	**Not applicable.** Land disposals or exchanges are not part of this project.
ACEC-MIN-1	High Potential Mineral Areas…	**Not applicable.** This project is not a mineral project.
ACEC-VRM-1	Manage Manzanar ACEC to conform to VRM Class II standards.	**Not applicable.** This project is not within the Manzanar ACEC.
General Public Land CMAs		
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.	**Consistent.** The Applicant would comply with this CMA. See Sections 3.2 Biological Resources, and 3.5, Cultural Resources.
GPL-2	DRECP LUPA Recreation Design - Activities 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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
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.	**Consistent.** The project would be consistent with the renewable energy and transmission design measures.
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.	**Consistent**. The project would be transmission aligned.
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	**Consistent**. The project would not have a measurable adverse impact on the implementation of the DRECP LUPA.

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	LUPA-wide structure, and implementation of the DRECP LUPA are not allowed.	
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
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:…	**Consistent**. This is covered under the existing cost recovery agreement.
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.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area. There are no direct, indirect, or cumulative effects to historic properties in the project area.
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.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area. Construction activities associated with the project would not have an effect to historic properties under Section 106 of the National Historic Preservation Act and would not result in any direct or indirect impacts to known historical resources under CEQA. See Section 3.5, Cultural Resources.
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.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area. Construction activities associated with the project would not have an effect to historic properties under Section 106 of the National Historic Preservation Act and would not result in any direct or indirect impacts to known historical resources under CEQA. See Section 3.5, Cultural Resources.
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.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area. Construction activities associated with the project would not have an effect to

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		historic properties under Section 106 of the National Historic Preservation Act and would not result in any direct or indirect impacts to known historical resources under CEQA. See Section 3.5, Cultural Resources.
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.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area. Construction activities associated with the project would not have an effect to historic properties under Section 106 of the National Historic Preservation Act and would not result in any direct or indirect impacts to known historical resources under CEQA. See Section 3.5, Cultural Resources.
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 utilityscale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement, if applicable.	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources under CEQA, were identified within the project area. Construction activities associated with the project would not have an effect to historic properties under Section 106 of the National Historic Preservation Act and would not result in any direct or indirect impacts to known historical resources under CEQA. See Section 3.5, Cultural Resources.
GPL-LANDS-1	Lands within GPL are unavailable for disposal.	**Not applicable.** The project does not include land disposals.
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.	**Not applicable.** The project does not include land withdrawals.
GPL-LIVE-1	Avoid siting solar developments in active livestock grazing allotments. …	**Not applicable**. The project is not located within any grazing allotments.
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.	**Not applicable.** The project is not located within any grazing allotments and it is not a wind project.
GPL-LIVE-3	A no surface occupancy stipulation will be included on geothermal leases in active grazing allotments.	**Not applicable.** The project is not located within any grazing allotments and it doesn't include any geothermal leasing.
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).	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
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	**Not applicable.** The project is not within 0.5 miles of a Level 3 Recreation Facility.

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	higher standard and maintain recreation objectives and setting characteristics.	
GPL-REC-3	When considering large-scale development in the GPL areas, retain to the extent possible existing, approved recreation activities.	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
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.	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
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.	**Not applicable.** The project would not displace authorized facilities.
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.	**Not applicable.** The project would not directly impact designated vehicle routes.
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.	**Not applicable.** The project would not impact authorized SRPs.
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.	**Not applicable.** The project is not located in any SRMAs.
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.	**Not applicable.** The project is not located in any ERMAs.
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).	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
GPL-VRM-1	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: …	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
GPL-VRM-1	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. …	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
California Desert National Conservation Lands CMAs: *These do not apply as the project falls within the California Desert Conservation Area (CDCA) but not on any designated conservation lands.*		
Wildlife Allocations CMAs: *These do not apply as the project is located outside of the designated Wildlife Allocation Areas.*		

DRECP CMA	CMA Summary	Consistency Determination
	Special Recreation Management Areas (SRMA) CMAs: *The project does border the Rasor SRMA but it is not located within the designated boundaries.*	
	Extensive Recreation Management Areas (ERMA) CMAs *These do not apply as the project is located outside of ERMAs.*	
	Development Focus Areas (DVF) CMAs: *These do not apply as the project is located outside of DFVs.*	

Table 3.11-2 Project Consistency with Appliable IOPs from the WWEC ROD

WWEC ROD IOP	Consistency Determination
Regulatory Compliance	
1. The appropriate agency, assisted by the applicant, must conduct project-specific NEPA analyses in compliance with Section 102 of NEPA. The scope, content, and type of analysis shall be determined on a project-by-project basis by the Agencies and the applicants.	**Consistent**. The BLM issued a Record of Decision (ROD) to approve the project and associated amendment to the CDCA Plan in March 2016 (BLM 2016).
2. The appropriate agency, assisted by the project applicant, must comply with Section 106 of the NHPA on a project-by-project basis. Consultation with SHPOs, any federally recognized Tribes, and other appropriate parties as per regulations (36 CFR 800) must begin early in the planning process and continue throughout project development and execution. The ACHP retains the option to comment on all undertakings (36 CFR 800.9).	**Consistent.** The BLM is compliance with Section 106 of the NHPA. Cultural inventories have been completed for the project area and no historic properties would be adversely affected. The BLM has/would consult with the appropriate agencies during the planning process.
3. The appropriate agency, assisted by the project applicant, must consult with the USFWS and the NMFS as required by Section 7 of ESA. The specific consultation requirements, as set forth in regulations at 50 CFR Part 402, would be applied on a project-by-project basis. Applicants shall identify known occupied sites, such as nest sites, for threatened and endangered species and special status species (BLM 2008).	**Consistent**. As outlined in APM BIO-1 through APM BIO-39, and MM BIO-1 and MM-BIO-29, the applicant will consult with USFWS and the project will adhere to all relevant USFWS protocol. See Section 3.4, Biological Resources.
4. The appropriate agency, assisted by the project applicant, must coordinate and consult with NMFS regarding potential impacts to essential fish habitat (EFH) as required by the 1996 reauthorization of the Magnuson-Stevens Fishery Conservation and Management Act.	**Not applicable**. The project would not result in any impacts to essential fish habitat.
Agency Coordination	
1. Applicants seeking to develop energy transport projects within corridors located on or near DOD facilities or flight training areas (see Appendix L of the PEIS for applicable corridors) must, early in the planning process and in conjunction with the appropriate agency staff, inform and coordinate with the DOD regarding the characteristics and locations of the anticipated project infrastructure.	**Not applicable.** The project would not be located on or near DOD facilities or flight training areas.
2. Early in the planning process, applicants seeking a ROW authorization within a Section 368 energy corridor that is located within 5 miles of a unit of the NPS should contact the appropriate Agency staff and work with the NPS regarding the characteristics and locations of anticipated project infrastructure. In those instances where corridors cross lands within the boundaries of a unit of the NPS, the National Park Service Organic Act and other relevant laws and policies shall apply.	**Consistent**. The project is bounded directly to the east by the Mojave National Preserve, administered by the National Park Service. Applicant coordination with the National Park Service has been on going.
3. In those instances where projects using energy corridors are proposed to also cross National Wildlife Refuge System lands, the National Wildlife System Administration Act and other relevant laws and policies pertinent to national wildlife refuges shall apply.	**Not applicable.** The project would not cross National Wildlife Refuge System lands.
4. For electricity transmission projects, the applicant shall notify the Federal Aviation Administration (FAA) as early as practicable in the	**Not applicable.** The project is not a transmission project.

WWEC ROD IOP	Consistency Determination
planning process in order to identify appropriate aircraft safety requirements.	
5. All project applications must reflect applicable findings, mitigation, and/or standards contained in regional land management plans, such as the Northwest Forest Plan, when such regional plans have been incorporated into agency planning guidelines and requirements. Modification of some standards may be needed to reasonably allow for energy transport within a corridor.	**Consistent.** The project is incorporating applicable regional land management plans such as the DRCEP and the WWEC.
Government-to-Government Consultation	
1. The appropriate agency, assisted by the project applicant, must initiate government-to-government consultation with affected Tribes at the outset of project planning and shall continue consultation throughout all phases of the project, as necessary. Agencies should determine how to consult in a manner that reflects the cultural values, socioeconomic factors, and administrative structures of the interested Tribes.	**Consistent.** On October 22, 2022, the CDFW sent letters to 35 individuals representing 29 tribal groups on the NAHC contact list. The CDFW received three responses. On January 4, 2023, SWCA contacted the NAHC for an updated review of the SLF. SWCA received the results of the updated SLF search from the NAHC on January 24, 2023. The results of the updated review were negative (see Appendix F). See Section 3.18, Tribal Cultural Resources.
2. The agency POC may require the project proponent to prepare an ethnographic study when Tribal consultation indicates the need. The study shall be conducted by a qualified professional selected in consultation with the affected Tribe.	**Not applicable.** Tribal consultation did not indicate the need for an ethnographic study.
General	
1. Applicants seeking to develop an electricity transmission or pipeline project will develop a project-specific plan of development (POD). The POD should display the location of the project infrastructure (i.e., towers, power lines) and identify areas of short- and long-term land and resource impacts and the mitigation measures for site-specific and resource-specific environmental impacts. The POD should also include notification of project termination and decommissioning to the agencies at a time period specified by the agencies.	**Consistent.** The Applicant has prepared a POD for the project which includes potential impacts and mitigation measures.
2. Applicants, working with the appropriate agencies, shall design projects to comply with all appropriate and applicable agency policies and guidance.	**Consistent.** The Applicant is working with the BLM and other appropriate agencies to design the project in a way that complies with applicable policies and guidance.
3. Project planning shall be based on the current state of knowledge. Where corridors are subject to sequential projects, project-related planning (such as the development of spill-response plans, cultural resource management plans, and visual resource management plans) and project-specific mitigation and monitoring should incorporate information and lessons learned from previous projects.	**Consistent.** The project design is based on the current state of knowledge, and the Applicant would implement project specific mitigation measures and applicant proposed measure to reduce environmental impacts to the extent feasible.
4. Applicants shall follow the best management practices for energy transport project siting, construction, and operations of the states in which the proposed project would be located, as well as Federal agency practices.	**Consistent.** The project would follow the best management practices.
5. Corridors are to be efficiently used. The applicant, assisted by the appropriate agency, shall consolidate the proposed infrastructure, such as access roads, wherever possible and utilize existing roads to the maximum extent feasible, minimizing the number, lengths, and widths of roads, construction support areas, and borrow areas.	**Consistent.** The project would use existing roads to the extent feasible and would otherwise use existing corridors as efficiently as possible.
6. When concurrent development projects are proposed and implemented within a corridor, the agency POCs shall coordinate the projects to ensure consistency with regard to all regulatory compliance and consultation requirements, and to avoid duplication of effort.	**Consistent.** The Applicant is coordinating with agency POCs and has prepared a cumulative impacts analysis in each environmental impact section.
7. Applicants, assisted by the appropriate agency, shall prepare a monitoring plan for all project-specific mitigation activities.	**Consistent.** A Mitigation Monitoring and Reporting Program (MMRP) will be prepared for the project.

WWEC ROD IOP	Consistency Determination
8. Potential cumulative impacts to resources should be considered during the early stages of the project. Agency POCs must coordinate various development projects to consider and minimize cumulative impacts. A review of resource impacts resulting from other projects in the region should be conducted and any pertinent information be considered during project planning.	**Consistent.** The Applicant is coordinating with agency POCs and has prepared a cumulative impacts analysis in each environmental impact section.
Project Design	
1. Applicants shall locate desired projects within energy corridors to promote effective use of the corridors by subsequent applicants and to avoid the elimination of use or encumbrance of use of the corridors by ROW holders. Proposed projects should be compatible with identified energy transport modes and avoid conflicts with other land uses within a corridor.	**Consistent.** The project would not result in land use conflicts and would result in an effective use of the corridor.
2. Applicant shall identify and delineate existing underground metallic pipelines in the vicinity of a proposed electricity transmission line project and design the project to avoid accelerating the corrosion of the pipelines and/or pumping wells.	**Consistent.** Existing underground metallic pipelines were delineated in the Phase I Environmental Site Assessment prepared for the project (Appendix I).
Transportation	
1. The applicant shall prepare an access road siting and management plan that incorporates relevant agency standards regarding road design, construction, maintenance, and decommissioning. Corridors will be closed to public vehicular access unless determined by the appropriate Federal land manager to be managed as part of an existing travel and transportation network in a land use plan or subsequent travel management plan(s).	**Consistent**. The Applicant will prepare a Construction Traffic Management Plan (CTMP) as required by **APM TRA-1**, listed in Section 3.17, Transportation.
2. The applicant shall prepare a comprehensive transportation plan for the transport of transmission tower or pipeline components, main assembly cranes, and other large equipment. The plan should address specific sizes, weights, origin, destination, and unique equipment handling requirements. The plan should evaluate alternative transportation routes and should comply with state regulations and all necessary permitting requirements. The plan should address site access roads and eliminate hazards from truck traffic or adverse impacts to normal traffic flow. The plan should include measures such as informational signage and traffic controls that may be necessary during construction or maintenance of facilities.	**Consistent**. The Applicant will prepare a Construction Traffic Management Plan (CTMP) as required by **APM TRA-1**, listed in Section 3.17, Transportation.
3. Applicants shall consult with local planning authorities regarding increased traffic during the construction phase, including an assessment of the number of vehicles per day, their size, and type. Specific issues of concern (e.g., location of school bus routes and stops) should be identified and addressed in the traffic management plan.	**Consistent**. The Applicant will prepare a Construction Traffic Management Plan (CTMP) as required by **APM TRA-1**, listed in Section 3.17, Transportation.
Groundwater	
1. Applicants must identify and delineate all sole source aquifers in the vicinity of a proposed project and design the project to avoid disturbing these aquifers or to minimize potential risks that the aquifers could be contaminated by spills or leaks of chemicals used in the projects.	**Consistent.** A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
2. In instances where a project within an energy corridor crosses sole source aquifers, the applicant must notify the U.S. Environmental Protection Agency (EPA) and the agencies that administer the land as early as practicable in the planning process. Section 1424(e) of the Safe Drinking Water Act (42 USC Chapter 6A) and other relevant laws and policies pertinent to the corridors that cross sole source aquifers shall apply.	**Consistent.** A Water Supply Assessment has been prepared for the project (Appendix J). See Section 3.10 Hydrology and Water Quality.
Surface Water	
1. Applicants must identify all wild and scenic rivers (designated by act of Congress or by the Secretary of the Interior under Section 3(a) or 2(a)(ii) of the Wild and Scenic Rivers Act (16 USC 1271-1287), respectively),	**Consistent.** An Aquatic Resources Delineation Report has been prepared for the project

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congressionally authorized wild and scenic study rivers, and agency identified (eligible or suitable) wild and scenic study rivers in the vicinity of a proposed project and design the project to avoid the rivers or mitigate the disturbance to the rivers and their vicinity.	(Appendix E-1). See Section 3.2, Biological Resources.
2. In instances where a project within an energy corridor crosses a wild and scenic river or a wild and scenic study river, the appropriate Federal permitting agency, assisted by the project applicant, must coordinate and consult with the river-administrating agency regarding the protection and enhancement of the river's free-flowing condition, water quality, and outstandingly remarkable natural, cultural, and recreational values.	**Consistent.** An Aquatic Resources Delineation Report has been prepared for the project (Appendix E-1). See Section 3.2, Biological Resources.
3. Applicants shall identify all streams in the vicinity of proposed project sites that are listed as impaired under Section 303(d) of the Clean Water Act (33 USC Chapter 26) and provide a management plan to avoid or mitigate adverse impacts on those streams.	**Consistent.** An Aquatic Resources Delineation Report has been prepared for the project (Appendix E-1). See Section 3.2, Biological Resources.
Paleontological Resources	
1. The applicant shall conduct an initial scoping assessment to determine whether construction activities would disturb formations that may contain important paleontological resources. Potential impacts to significant paleontological resources should be avoided by moving or rerouting the site of construction or removing or reducing the need for surface disturbance. When avoidance is not possible, a mitigation plan should be prepared to identify physical and administrative protective measures and protocols such as halting work, to be implemented in the event of fossil discoveries. The scoping assessment and mitigation plan should be conducted in accordance with the managing agency's fossil management practices and policies.	**Consistent.** A Paleontological Resources Technical Report has been prepared for the project (Appendix H). See Section 3.22, Paleontological Resources.
2. If significant paleontological resources are known to be present in the project area, or if areas with a high potential to contain paleontological material have been identified, the applicant shall prepare a paleontological resources management and mitigation plan. If adverse impacts to paleontological resources cannot be avoided or mitigated within the designated corridors, the agency may consider alternative development routes to avoid, minimize, or mitigate adverse effects.	**Consistent.** A Paleontological Resources Technical Report has been prepared for the project (Appendix H). See Section 3.22, Paleontological Resources.
3. A protocol for unexpected discoveries of significant paleontological resources should be developed. Unexpected discovery during construction should be brought to the immediate attention of the responsible Federal agency's authorized officer. Work should be halted in the vicinity of the discovery to avoid further disturbance of the resource while the resource is being evaluated and appropriate mitigation measures are being developed.	**Consistent.** A Paleontological Resources Technical Report has been prepared for the project (Appendix H). See Section 3.22, Paleontological Resources.
Ecological Resources	
1. Applicants shall identify important, sensitive, or unique habitats and BLM-special status species (BLM 2008), FS-sensitive, and state-listed species in the vicinity of proposed projects and design the project to avoid or mitigate impacts to these habitats and species.	**Consistent.** An Biological Resources Technical Report has been prepared for the project (Appendix D). See Section 3.2, Biological Resources.
2. To restore disturbed habitats, the applicant will prepare a habitat restoration plan that identifies the approach and methods to be used to restore habitats disturbed during project construction activities. The plan will be designed to expedite the recovery to natural habitats supporting native vegetation, and require restoration to be completed as soon as practicable after completion of construction, minimizing the habitat converted at any one time. To ensure rapid and successful restoration efforts, the plan will include restoration success criteria, including time frames, which will be developed in coordination with the appropriate agency and which must be met by the applicant. Bonding to cover the full cost of restoration will be required.	**Consistent.** An Biological Resources Technical Report has been prepared for the project (Appendix D). See Section 3.2, Biological Resources.
3. In consultation with the U.S. Army Corps of Engineers, the appropriate agency, assisted by the project applicant, will identify wetlands (including ephemeral, intermittent, and isolated wetlands), riparian habitats, streams,	**Consistent.** An Biological Resources Technical Report has been prepared for the project

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and other aquatic habitats in the project area and design the project to avoid or mitigate impacts to these habitats.	(Appendix D). See Section 3.2, Biological Resources.
Vegetation Management	
Applicants shall develop an integrated vegetation management plan consistent with applicable regulations and agency policies for the control of unwanted vegetation, noxious weeds, and invasive species (E.O. 13112). The plan should address monitoring; ROW vegetation management; the use of certified weed-seed-free hay, straw, and/or mulch; the cleaning of vehicles to avoid the introduction of invasive weeds; education of personnel on weed identification, the manner in which weeds spread, and the methods for treating infestations (BLM 2006, 2007a,b, 2008).	**Consistent.** An Biological Resources Technical Report has been prepared for the project (Appendix D). See Section 3.2, Biological Resources.
Cultural Resources	
1. Cultural resources management services and individuals providing those services shall meet the Secretary of the Interior's Standards for Archeology and Historic Preservation, 48 FR 44716 (Sept. 29, 1983).	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). See Section 3.5, Cultural Resources.
2. The project applicant may, with the approval of the agency POC, assign a Cultural Resource Coordinator to ensure an integrated compliance process across administrative and jurisdictional boundaries. The Cultural Resource Coordinator will facilitate and coordinate compliance with multiple laws, policies, regulations, and existing pertinent agreements (PAs, MOAs, or MOUs) among multiple agencies and other entities, jurisdictions, and federally recognized Tribes. The coordinator may assist with development of pertinent agreements among concerned parties during the course of the project. The coordinator shall be a qualified professional with experience in cultural resource compliance. Where appropriate, the Cultural Resource Coordinator may also serve as the Tribal Coordinator. Alternatively, the agency POC may assign such coordinators, to be paid for through project cost-recovery funds. The agencies, through the POC, remain responsible for consultation.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
3. The project applicant may, with the approval of the agency POC, assign a Tribal Coordinator to facilitate and coordinate consultation and compliance with multiple laws, agencies, and Tribes in order to ensure effective government-to-government consultation throughout the life of the project. Alternatively, the agency POC may assign such coordinators, to be paid for through project cost-recovery funds. The agencies, through the POC, remain responsible for consultation.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
4. All historic properties in the Area of Potential Effect (APE) will be identified and evaluated. The APE shall include that area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties and shall include a reasonable construction buffer zone and laydown areas, access roads, and borrow areas, as well as a reasonable assessment of areas subject to effects from visual, auditory, or atmospheric impacts, or impacts from increased access.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
5. Project proponents must develop a cultural resources management plan (CRMP) to outline the process for compliance with applicable cultural resource laws during pre-project planning, management of resources during operation, and consideration of the effect of decommissioning. The CRMPs should meet the specifications of the appropriate agency and address compliance with all appropriate laws. The CRMPs should include the following, as appropriate: identification of the federally recognized Tribes, State Historic Preservation Offices (SHPOs), and consulting parties for the project; identification of long- and short-term management goals for cultural resources within the APE of the project; the definition of the APE; appropriate procedures for inventory, evaluation, and identification of effects to historic properties; evaluation of eligibility for the National Register of Historic Places (NRHP) for all resources in the APE; description of the measures to avoid, minimize, or mitigate adverse effects to historic properties; procedures for inadvertent discovery; procedures for considering Native American Graves Protection and Repatriation Act	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.

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(NAGPRA) issues, monitoring needs, and plans to be employed during construction; curation procedures; anticipated personnel requirements and qualifications; public outreach and interpretation plans; and discussion of other concerns. The draft CRMP should be reviewed and approved by the agency POC in consultation with historic preservation partners, including appropriate SHPOs, Tribes, and consulting parties. The CRMPs must specify procedures that would be followed for compliance with cultural resource laws should the project change during the course of implementation.	
6. Project applicants will provide cultural resources training for project personnel regarding the laws protecting cultural resources, appropriate conduct in the field (such as procedures for the inadvertent discovery of human remains), and other project-specific issues identified in the CRMP. Training plans should be part of the CRMP and should be subject to the approval of the POC. When government-to-government consultation identifies the need and the possibility, Tribes may be invited to participate in or contribute to relevant sessions.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
7. If adverse effects to historic properties will result from a project, a Historic Property Treatment Plan will be developed in consultation with the SHPO, the appropriate federally recognized Tribes, and any consulting parties. The plan will outline how the impacts to the historic properties would be mitigated, minimized, or avoided. Agency officials will give full consideration to the applicable mitigation measures found in Section 3.10.5.2 of the Final PEIS when consulting during the project pre-planning stages to resolve adverse effects on historic properties.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
8. As directed by the agency POC, project proponents will prepare a public education and outreach component regarding project-related cultural resource issues (e.g., discoveries, impacts) such as a public presentation, a news article, a publication, or a display. Public education and outreach components will be subject to Agency approval and Tribal review and consultation when the content or format is of interest to affected Tribes.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
9. Cultural resources inventory, evaluation, and mitigation practices should incorporate modeling and sampling strategies to the extent practicable, in concurrence with SHPOs and other relevant parties, and as approved by the agency POC.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
10. Project applicants shall provide all cultural resources reports and data in an electronic format that is approved by the Agency POC and integrated across jurisdictional boundaries, that meets current standards, and that is compatible with SHPO systems. The Agency will submit this data to the SHPO in a timely fashion. Project proponents should submit cultural resources data on a regular basis to ensure that SHPO systems are kept up to date for reference as the different phases of the project proceed. Paper records may also be required by the agency.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
11. Cultural resources inventory procedures, specified in the CRMP, will include development of historic contexts based on the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 FR 44716) sufficient to support the evaluation of cultural resources encountered in the APE.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
Tribal Traditional Cultural Resources	
1. The appropriate agency, assisted by the applicant, must comply with all laws, policies, and regulations pertaining to government-to-government consultation with federally recognized Tribes. Agencies shall initiate consultation with affected Tribes at the outset of project planning and shall continue consultation throughout project planning, construction, operation, and decommissioning. Consultation shall include, but not be limited to, the following: (a) identification of potentially affected Tribes; (b) identification	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.

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of appropriate Tribal contacts and the preferred means of communication with these Tribes; (c) provision to the Tribes of project-specific information (e.g., project proponents, maps, design features, proposed ROW routes, construction methods, etc.) at the outset of project planning and throughout the life of the project; (d) identification of issues of concern specific to affected Tribes (e.g., potential impacts to culturally sensitive areas or resources, hazard and safety management plans, treaty reserved rights and trust responsibilities); (e) identification of areas and resources of concern to Tribes; and (f) resolution of concerns (e.g., actions to avoid, minimize, or mitigate impacts to important resources; Memoranda of Agreement stating what actions would be taken to mitigate project effects; or agreements for Tribal participation in monitoring efforts or operator training programs).	
2. The appropriate agency, assisted by the applicant, must comply with all pertinent laws, policies, and regulations addressing cultural and other resources important to Tribes, including the NHPA, the Archaeological Resources Protection Act (ARPA), the Native American Graves Protection Act (NAGPRA), and other laws and regulations as listed in Table 3.11-2 in Volume I of the PEIS.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
3. The agencies shall recognize the significance to many Tribes of traditional cultural places, such as sacred sites, sacred landscapes, gathering grounds, and burial areas, and shall seek to identify such areas through consultation with affected Tribes early in the project planning process. Agencies shall seek to avoid, minimize, or mitigate impacts to such places in consultation with the Tribes, project proponents, and other relevant parties. Where confidentiality concerning these areas is important to an affected Tribe, agencies shall honor such confidentiality unless the Tribe agrees to release the information.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
4. A protocol must be developed for inadvertent discovery of Native American human remains and funerary items to comply with the NAGPRA in consultation with appropriate federally recognized Tribes. Unexpected discovery of such items during construction must be brought to the immediate attention of the responsible Federal agency's authorized officer. Work must be halted in the vicinity of the find of Native American graves and funerary items to avoid further disturbance to the resources while they are being evaluated and appropriate mitigation measures are being developed. The procedures for reporting items covered under NAGPRA must be identified in the CRMP.	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project (Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
Visual Resources	
1. Applicants shall identify and consider visual resource management (VRM) and scenery management (SMS) issues early in the design process to facilitate integration of VRM and scenery treatments into the overall site development program and construction documents. Visual/scenery management considerations, environmental analyses, mitigation planning, and design shall reference and be in accordance with the land management agency visual/scenery management policies and procedures applicable to the jurisdiction the project lies within. Applicants shall coordinate between multiple agencies on visual/scenery sensitive issues when projects transition from one jurisdiction to another, especially when transitions occur within a shared viewshed.	**Consistent.** An Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.
2. Applicants shall prepare a VRM or scenery management plan. The applicant's planning team shall include an appropriately trained specialist, such as a landscape architect with demonstrated VRM and/or scenery management system (SMS) experience. The VRM/SMS specialist shall coordinate with the BLM/FS on the availability of the appropriate visual or scenic inventory data, VRM management class delineations, Scenic Integrity Objectives (SIOs), and Federal agency expectations for preparing project plans and mitigation strategies to comply with RMP or LRMP direction related to scenery and/or visual resources. Applicants shall confirm that a current Visual Resource Inventory and/or Scenic Class inventory is available and that the resource management plan (RMP) or land resource and management plan (LRMP) VRM classifications or SIOs	**Consistent.** An Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.

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have been designated in the current land management plan. Project plans shall abide by the VRM class designations and SIOs and consider sensitivities defined within the visual or scenic resource inventory. If visual or scenic management objectives are absent, then the proper inventory and classification process shall be followed to develop them in accordance with the BLM VRM manual and handbooks or FS SMS process, depending on the agency. When the VRM management classes or SIOs are absent, then the project alternatives must reflect a range of management options related to scenery and visual resources that reflect the values identified in the visual/scenic inventory. Responsibility for developing an inventory or VRM management classes (or in the case of the FS, Scenic Classes and SIOs) will remain with the respective agency, but how to accomplish these tasks will be determined by the field office manager or forest supervisor, who will consider the applicant's role and financial participation in completing the work.	
3. Visual and scenic mitigation planning/design and analysis shall be performed through integrated field assessment, applied global positioning system (GPS) technology, field photo documentation, use of computer-aided design and development software, 3-D modeling GIS software, and visual simulation software, as appropriate. Proposed activities, projects, and site development plans shall be analyzed and further developed using these technologies to meet visual and scenic objectives for the project area and surrounding areas sufficient to provide the full context of the viewshed. Visual simulations shall be prepared according to BLM Handbook H-8432-1, or other agency requirements, to create spatially accurate depictions of the appearance of proposed facilities, as reflected in the 3-D design models. Simulations shall depict proposed project appearance from sensitive/scenic locations as well as more typical viewing locations. Transmission towers, roads, compressor stations, valves, and other aboveground infrastructure should be integrated aesthetically with the surrounding landscape in order to minimize contrast with the natural environment.	**Consistent.** An Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.
4. Applicants shall develop adequate terrain mapping on a landscape/viewshed scale for site planning/design, visual impact analysis, visual impact mitigation planning/design, and for full assessment and mitigation of cumulative visual impacts through applied, state-of-the-art design practices using the cited software systems. The landscape/viewshed scale mapping shall be geo-referenced and at the same Digital Elevation Model (DEM) resolution and contour interval within the margin of error suitable for engineered site design. This level of mapping shall enable proper placement of proposed developments into the digital viewshed context. Final plans shall be field verified for compliance.	**Consistent.** An Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.
5. The full range of visual and scenic best management practices shall be considered, and plans shall incorporate all pertinent best management practices (BMPs). Visual and scenic resource monitoring and compliance strategies shall be included as a part of the project mitigation plans.	**Consistent.** An Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.
6. Compliance with VRM/SMS objectives shall be determined through the use of the BLM Contrast Rating procedures defined in BLM Handbook H-8431-1 Visual Contrast Rating, or the FS SMS Handbook 701. Mitigation of visual impacts shall abide by the requirements of these handbooks.	**Consistent.** An Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.
Public Health and Safety	
1. An electricity transmission project shall be planned by the applicant to comply with FAA regulations, including lighting regulations, and to avoid potential safety issues associated with proximity to airports, military bases or training areas, or landing strips.	**Consistent.** See Sections 3.9, Hazards and 3.21, Public Health.
2. A health and safety program shall be developed by the applicant to protect both workers and the general public during construction, operation, and decommissioning of an energy transport project. The program should identify all applicable Federal and state occupational safety standards, establish safe work practices for each task (e.g., requirements for	**Consistent.** See Sections 3.9, Hazards and 3.21, Public Health.

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personal protective equipment and safety harnesses, Occupational Safety and Health Administration [OSHA] standard practices for safe use of explosives and blasting agents, measures for reducing occupational electromagnetic field [EMF] exposures), and define safety performance standards (e.g., electrical system standards). The program should include a training program to identify hazard training requirements for workers for each task and establish procedures for providing required training to all workers. Documentation of training and a mechanism for reporting serious accidents to appropriate agencies should be established.	
3. The health and safety program shall establish a safety zone or setback from roads and other public access areas that is sufficient to prevent accidents resulting from various hazards. It should identify requirements for temporary fencing around staging areas, storage yards, and excavations during construction or decommissioning activities. It should also identify measures to be taken during the operations phase to limit public access to those components of energy facilities that present health or safety risks.	**Consistent.** See Sections 3.9, Hazards and 3.21, Public Health.
4. Applicants shall develop a comprehensive emergency plan that considers the vulnerabilities of their energy system to all credible events initiated by natural causes (earthquakes, avalanches, floods, high winds, violent storms, etc.), human error, mechanical failure, cyber attack, sabotage, or deliberate destructive acts of both domestic and international origin and the potential for and possible consequences of those events. Vulnerability, threat, and consequence assessment methodologies and criteria in the sector-specific plan (SSP) for energy[2] will be used and appropriate preemptive and mitigative response actions will be identified. The applicant must coordinate emergency planning with state, local, and Tribal emergency and public safety authorities and with owners and operators of other energy systems collocated in the corridor or in adjacent corridors that could also be impacted.	**Consistent.** See Sections 3.9, Hazards and 3.21, Public Health.
5. In addition to directives contained in other IOPs herein, the applicant must identify all Federal, state, and local regulations pertaining to environmental protection, worker health and safety, public safety, and system reliability that are applicable throughout the construction, operation, and decommissioning phases of their facility's life cycle and must develop appropriate compliance strategies, including securing all necessary permits and approvals.	**Consistent.** See Sections 3.9, Hazards and 3.21, Public Health.
Hazardous Materials Management	
Applicants for petroleum pipelines and projects involving oil-filled electrical devices shall develop a spill prevention and response plan identifying spill prevention measures to be implemented, training requirements, appropriate spill response actions, and procedures for making timely notifications to authorities. The spill prevention and response plan should include identification of any sensitive biotic resources and locations (such as habitats) that require special measures to provide protection, as well as the measures needed to provide that protection.	**Not applicable.** The proposed project does not include any petroleum pipelines or oil-filled electrical devices.
Fire Management	
1. Applicants shall develop a fire management strategy to implement measures to minimize the potential for a human-caused fire during project construction, operation, and decommissioning. The strategy should consider the need to reduce hazardous fuels (e.g., native and non-native annual grasses and shrubs) and to prevent the spread of fires started	**Consistent.** See Sections 3.9, Hazards and 3.20, Wildfire.

[2] The SSP for energy, developed by the Department of Energy's Office of Electricity Delivery and Energy Reliability, is one of seventeen such SSPs that comprise the National Infrastructure Protection Plan (NIPP). The energy SSP (redacted) is available at http://www.oe.energy.gov/DocumentsandMedia/Energy_SSP_Public.pdf. The NIPP is available at http://www.dhs.gov/xlibrary/assets/NIPP_Plan.pdf.

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outside or inside a corridor, and clarify who has responsibility for fire suppression and hazardous fuels reduction for the corridor.	
2. Applicants must work with the local land management agency to identify project areas that may incur heavy fuel buildups, and develop a long-term strategy on vegetation management of these areas. The strategy may include land treatment during project construction, which may extend outside the planned ROW clearing limits.	**Consistent.** See Sections 3.9, Hazards and 3.20, Wildfire.

3.11.4 Mitigation Measures

No mitigation measures are required.

3.11.5 Cumulative Impacts

Impact C-LUP-1: Would the impacts of the proposed project, in combination with other past, present, and reasonably foreseeable future projects, contribute to a cumulative impact related to land use and planning? (Less than Significant)

Past, present, and reasonably foreseeable future actions making up the cumulative scenario are identified in Table 3.1-1 in Section 3.4.1 Projects Included in Cumulative Conditions Scenario. Many solar and renewable energy projects have been proposed, approved, or constructed in the project area, both on private and public land. Similar to the project, some cumulative projects would block access to recreational opportunities or preclude other types of multiple use (e.g., agriculture, mining, grazing). With appropriate permitting, each project would avoid impacts on land use. During the permitting of the cumulative projects, multiple uses would be reviewed by BLM or the County to ensure there would be appropriate access and no direct conflicts.

As part of its planning process, BLM has set aside millions of acres for uses other than renewable development (e.g., recreation, mining, conservation) and has directed renewable development to DFAs. Additionally, the County's General Plan anticipated the potential for multiple solar projects in the area and, because each project must undergo this type of review and because the agencies have identified Desert Center as an area where renewable energy is acceptable, the project, in conjunction with other past, present, and probable future projects, would not result in a cumulatively considerable or significant land use impact. Therefore, the project **would not result in cumulatively considerable impacts** relative to land use and planning.

3.11.6 References Cited

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