DOCKETED	
Docket Number:	24-OPT-03
Project Title:	Soda Mountain Solar
TN #:	269352-4
Document Title:	Staff Memorandum on Record of Proceedings_Attachment 3
Description:	Admin Record - Part 3 of 5
Filer:	Ngoc Tran
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	3/27/2026 3:25:46 PM
Docketed Date:	3/27/2026

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Begin Bates	End Bates	Unified Title	Primary Date/Time
SMSP01559	SMSP01598	App C_Soda Mt Solar Project_AQ GHG Report_7-29-25_Redacted.pdf	7/29/2025 13:39
SMSP01599	SMSP01599	Soda Mt. REV 2 DR LAND-2	7/29/2025 15:08
SMSP01600	SMSP01657	3-11_Land Use & Planning_07-29-2025_CLEAN.docx	7/29/2025 14:52
SMSP01658	SMSP01718	3-11_Land Use & Planning_07-29-2025_redline.docx	7/29/2025 14:44
SMSP01719	SMSP01720	Re: Soda Mountain Solar Project- Request for Information	7/31/2025 15:26
SMSP01721	SMSP01722	Re: Soda Mountain- Request for archeology surveys for new access road	8/11/2025 15:49
SMSP01723	SMSP01727	Re: Site Visit Request for Soda Mountain Solar Project (8/29)	8/22/2025 11:12
SMSP01728	SMSP01732	RE: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap	7/25/2025 8:35
SMSP01733	SMSP01738	RE: Request to talk re: Soda Mountain Solar opt-in	8/7/2025 14:34
SMSP01739	SMSP01742	Re: Soda Mountain- Staff response to your question	8/12/2025 20:20
SMSP01743	SMSP01743	BLM & CEC - Soda Mtn Solar Project Amendment	8/28/2025 11:55
SMSP01744	SMSP01745	Soda Mountain- Access road question	8/6/2025 10:51
SMSP01746	SMSP01746	Soda Mountain- Confidential filing in response to WS-1	7/21/2025 16:44
SMSP01747	SMSP01748	Fw: Soda Mountain Completeness Review	7/22/2025 18:35
SMSP01749	SMSP01750	Re: Soda Mountain - JD Files	7/23/2025 16:19

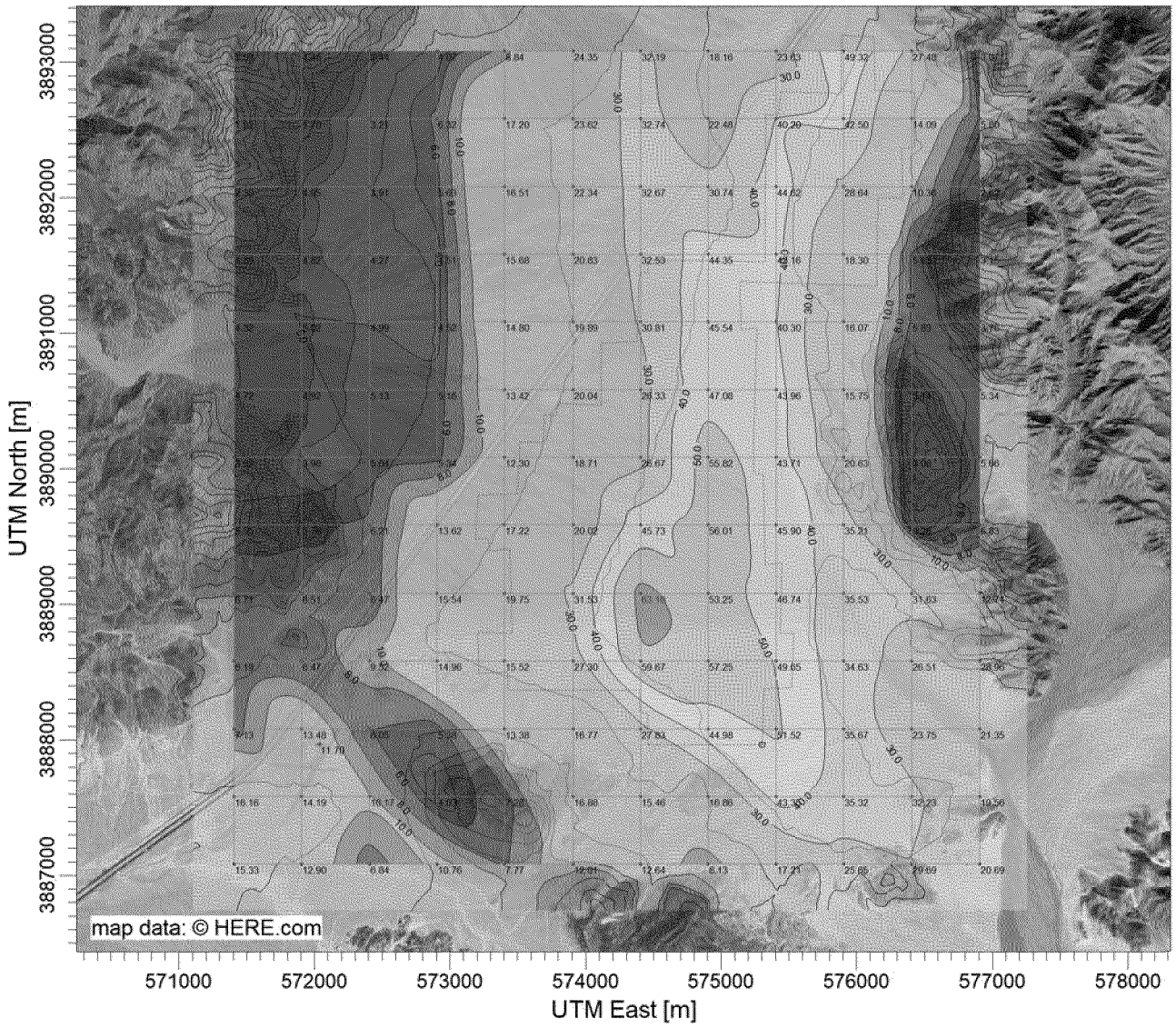
SMSP01751	SMSP01754	Re: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap	7/29/2025 8:49
SMSP01755	SMSP01757	Re: [EXTERNAL] BLM legal contact for a discussion with CEC legal staff re Soda Mountain Solar Project	7/30/2025 13:45
SMSP01758	SMSP01760	Fw: Review docketed items for Soda Mountain and confirm you are complete - ATTY-CLIENT PRIV	7/31/2025 10:26
SMSP01761	SMSP01761	WEMO- for Soda Mountain Solar Project	7/31/2025 10:55
SMSP01762	SMSP01763	Fw: Soda Mt. Solar	8/18/2025 11:00
SMSP01764	SMSP01766	Re: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project	8/25/2025 10:48
SMSP01767	SMSP01769	Re: Soda Mtn: Prelim Geotech Report Request	8/26/2025 15:58
SMSP01770	SMSP01773	Re: Your 6 confidential e-filing(s) successfully submitted	7/21/2025 17:05
SMSP01774	SMSP01774	Soda Mountain - JD Files	7/23/2025 14:44
SMSP01775	SMSP01775	Fw: Soda Mountain Venue Recommendations	7/29/2025 14:47
SMSP01776	SMSP01776	Memo - CEC Scoping Meeting Venues.pdf	7/29/2025 14:43
SMSP01777	SMSP01778	Follow-up Questions Soda Mt. Water-1 Information	7/31/2025 10:37
SMSP01779	SMSP01779	Word Version of Project Description	7/31/2025 12:02
SMSP01780	SMSP01809	2_Project Description_07-17-2025.docx	7/18/2025 16:39
SMSP01810	SMSP01810	Re: Soda Mountain- Can you send the contact info for the two Barstow venues	8/6/2025 18:08
SMSP01811	SMSP01812	RE: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project	8/25/2025 9:42
SMSP01813	SMSP01814	CEQA Comment_CA Energy Commission_Notice of Application_Soda Mt Solar Project 24-OPT-03.pdf	10/7/2024 15:24

SMSP01815	SMSP01815	BLM & CEC - Soda Mtn Solar Project Amendment	8/28/2025 12:41
SMSP01816	SMSP01818	Re: [EXTERNAL] Fw: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project	8/28/2025 12:43
SMSP01819	SMSP01819	Soda Mt. Solar	8/18/2025 10:57
SMSP01820	SMSP01828	Soda Mt. Solar CEC Scoping Meeting.pdf	8/18/2025 10:45
SMSP01829	SMSP01833	Re: Soda Mt. Solar	8/19/2025 11:42
SMSP01834	SMSP01834	CEC legal/Applicant legal discussion- Soda Mountain	7/29/2025 16:13
SMSP01835	SMSP01835	CEC Response to Soda Mountain Solar Project's Application for Confidentiality - Worker Safety	8/18/2025 9:44
SMSP01836	SMSP01839	RE: Application for Confidential Designation: Potentia-Viridi Battery Storage Energy Storage System Project	7/23/2025 8:28
SMSP01840	SMSP01840	Soda Mountain Preliminary Geotech Report	9/18/2025 15:44
SMSP01841	SMSP01842	Re: Soda Mountain- Project site-specific preliminary geotechnical studies and cultural survey for new access road	9/9/2025 8:41
SMSP01843	SMSP01844	Re: Soda Mountain- Project site-specific preliminary geotechnical studies and cultural survey for new access road	9/9/2025 15:16
SMSP01845	SMSP01847	Re: Soda Mountain- Project site-specific preliminary geotechnical studies and cultural survey for new access road	9/9/2025 15:55
SMSP01848	SMSP01850	Re: [EXTERNAL] Fw: Groundwater Test Well Report, Soda Mountain Solar Project	9/15/2025 10:06
SMSP01851	SMSP01853	Re: Groundwater Test Well Report, Soda Mountain Solar Project	9/25/2025 11:30
SMSP01854	SMSP01855	Following: Soda Mountain- Cultural surveys for access road via Zzyzx	9/18/2025 15:59
SMSP01856	SMSP01856	BLM & CEC - Soda Mtn Solar Project Amendment	8/28/2025 11:55
SMSP01857	SMSP01859	IM Department Review of Solar and Wind.pdf	7/15/2025 7:58

SMSP01860	SMSP01861	Soda Mountain- Stormwater flow with Project	9/30/2025 14:29
SMSP01862	SMSP01862	Soda Mountain BLM CEC Coordination	9/24/2025 11:24
SMSP01863	SMSP01863	Soda Mt. Solar Shape Files	9/2/2025 8:45
SMSP01864	SMSP01864	Secretarial Order 3438 - DOI Renewable Energy	9/2/2025 15:06
SMSP01865	SMSP01868	SO 3438 - Managing Federal Energy Resources and Protecting the Environment 1 (1).pdf	8/6/2025 9:01

PROJECT TITLE:

Soda Mountain Solar Project
Construction - NO2



PLOT FILE OF 1ST-HIGHEST MAX DAILY 1-HR VALUES AVERAGED OVER 1 YEARS FOR SOURCE GROUP: ALL ug/m^3

Max: 63.1 [ug/m^3] at (574405.52, 3889083.87)

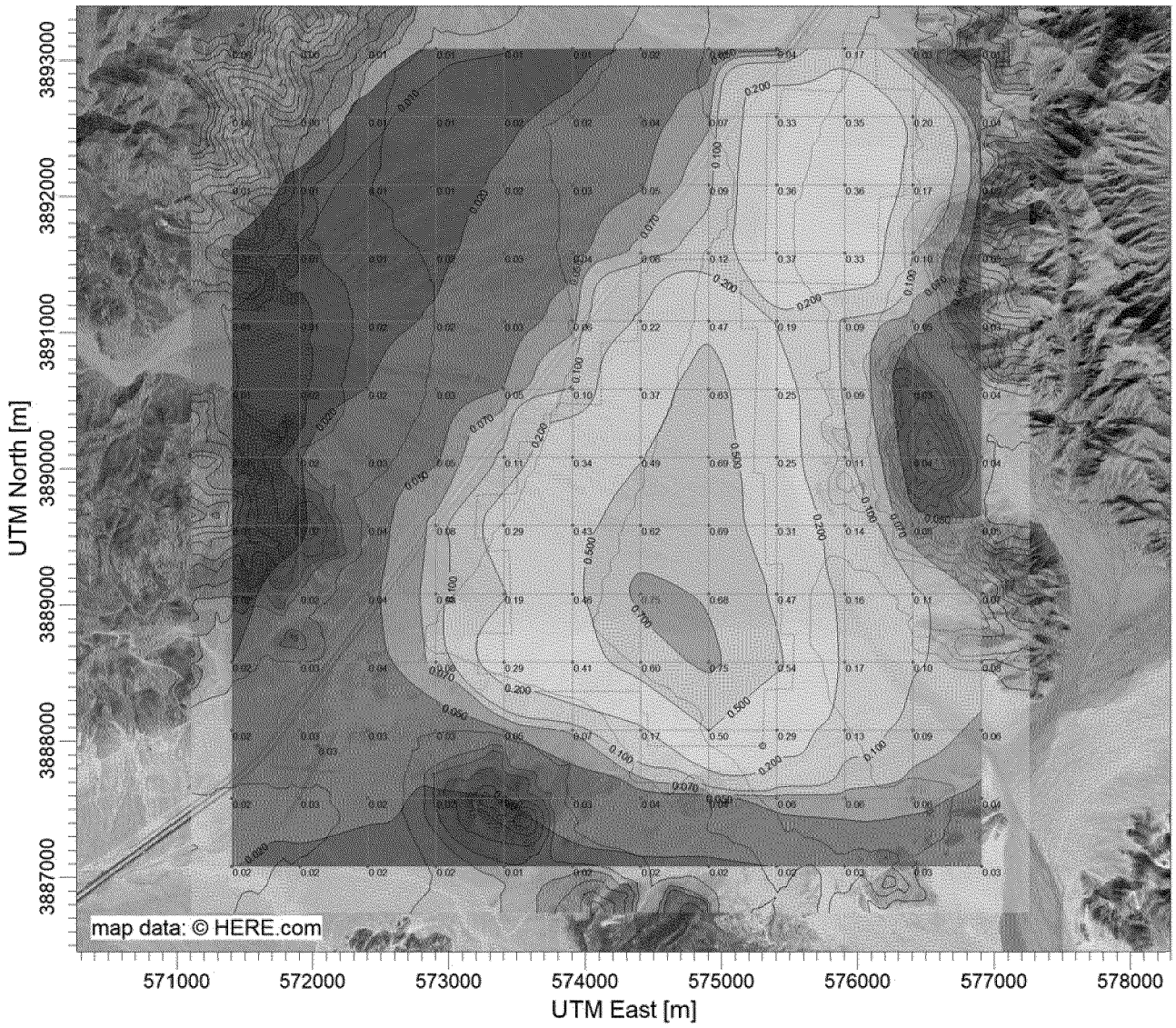
1.5 5.0 6.0 8.0 10.0 30.0 40.0 50.0 60.0 63.1

COMMENTS: 1-hour NO2	SOURCES: **1**	COMPANY NAME: **Baseline Environmental Consulting**	
	RECEPTORS: **157**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:50,701 (0 — 2 km)	
	MAX: **63.1 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

PROJECT TITLE:

Soda Mountain Solar Project
Construction - NO2



PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 1 YEARS FOR SOURCE GROUP: ALL ug/m^3

Max: 0.751 [ug/m^3] at (574405.52, 3889083.87)

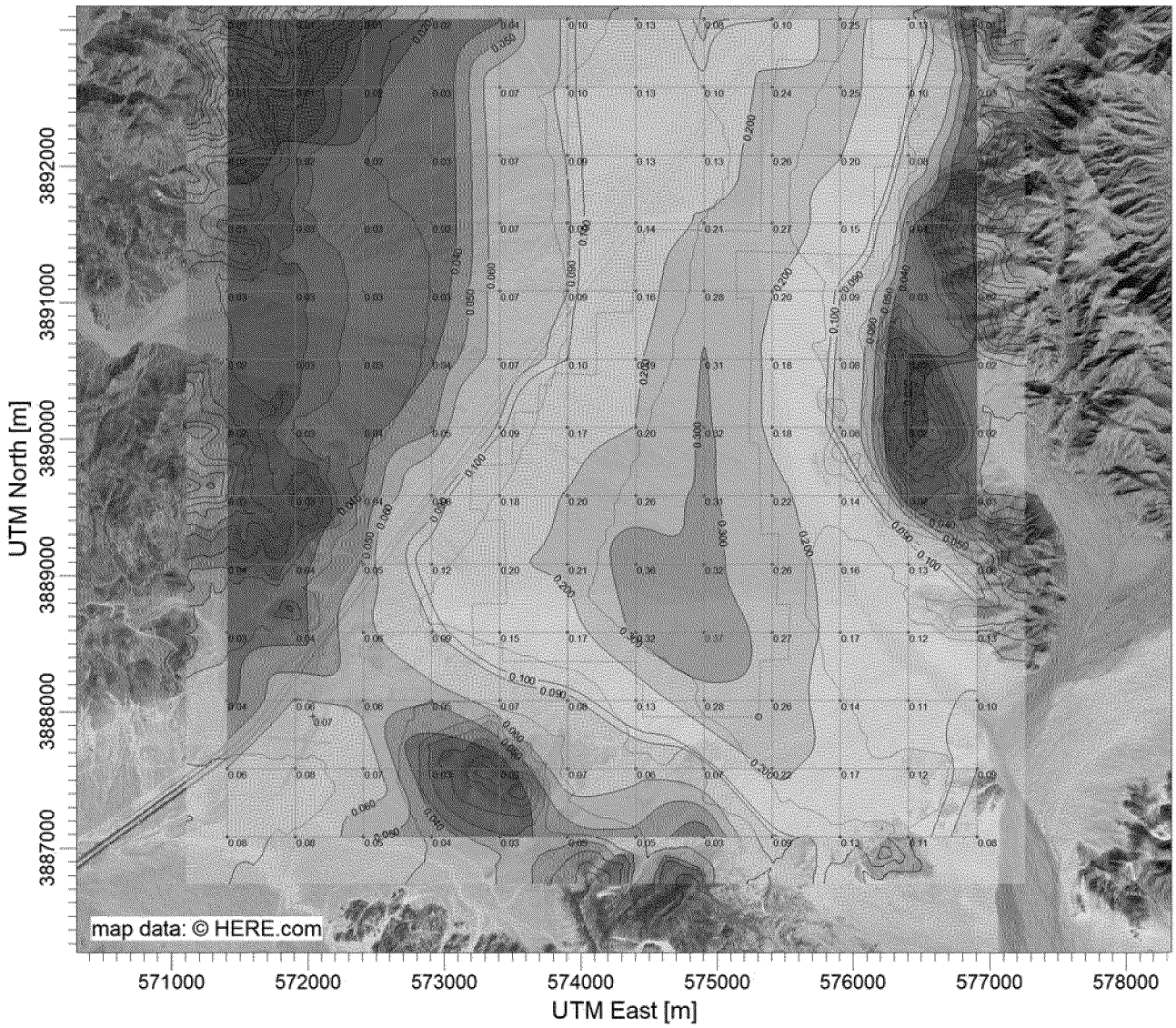
0.008 0.010 0.020 0.050 0.070 0.100 0.200 0.500 0.700 0.751

COMMENTS: Annual NO2	SOURCES: **1**	COMPANY NAME: **Baseline Environmental Consulting**	
	RECEPTORS: **157**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:50,442 (0 — 2 km)	
	MAX: **0.751 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

PROJECT TITLE:

Soda Mountain Solar Project
Construction - PM2.5



PLOT FILE OF 1ST-HIGHEST MAX DAILY 24-HR VALUES AVERAGED OVER 1 YEARS FOR SOURCE GROUP: ALL ug/m^3

Max: 0.375 [ug/m^3] at (574905.52, 3888583.87)

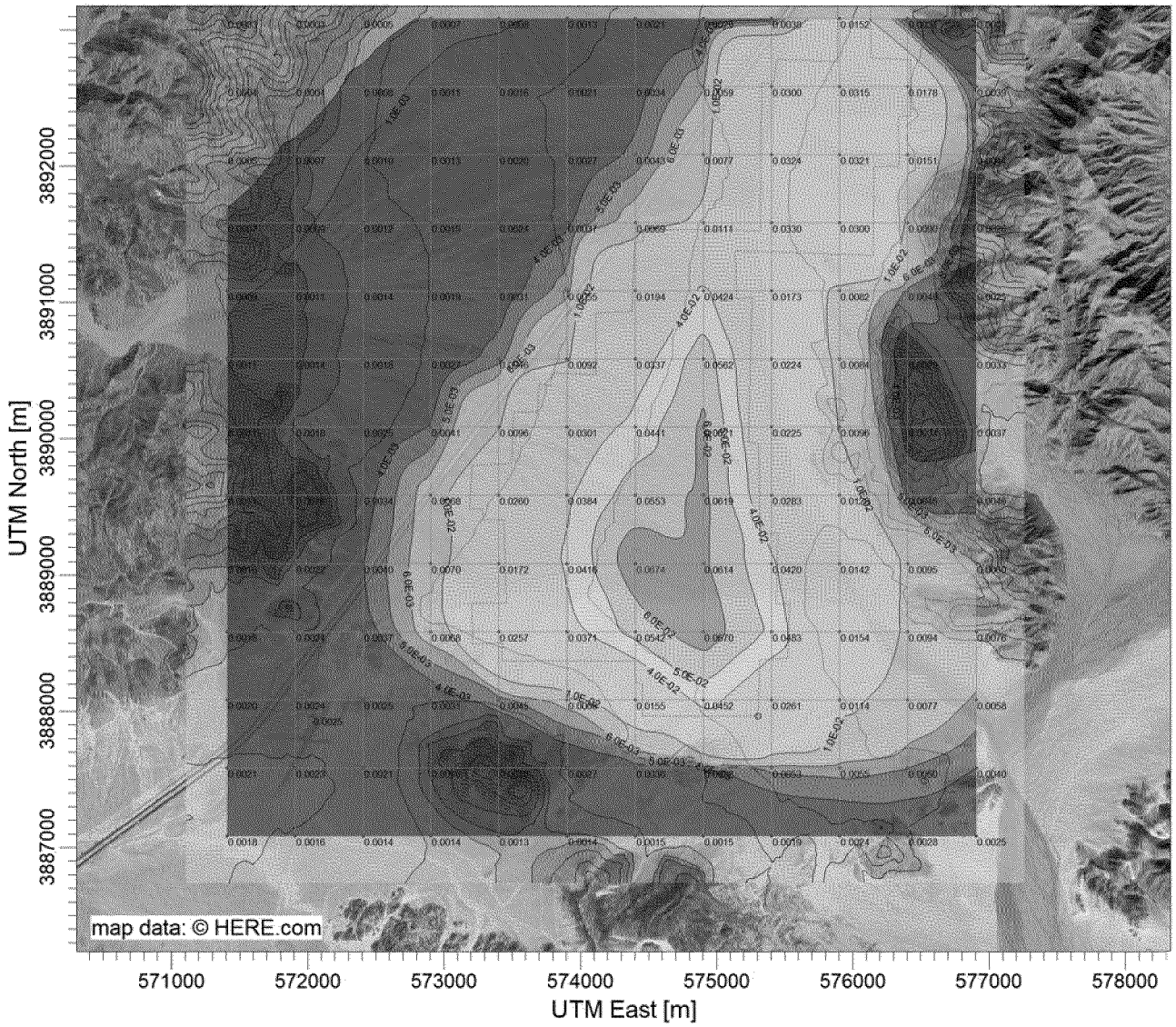
0.008 0.010 0.020 0.040 0.050 0.060 0.090 0.100 0.200 0.300 0.375

COMMENTS: 24-hour PM2.5	SOURCES: **1**	COMPANY NAME: **Baseline Environmental Consulting**	
	RECEPTORS: **157**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:50,440 0 2 km	
	MAX: **0.375 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

PROJECT TITLE:

Soda Mountain Solar Project
Construction - PM2.5



PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 1 YEARS FOR SOURCE GROUP: ALL ug/m^3

Max: 6.7E-02 [ug/m^3] at (574405.52, 3889083.87)

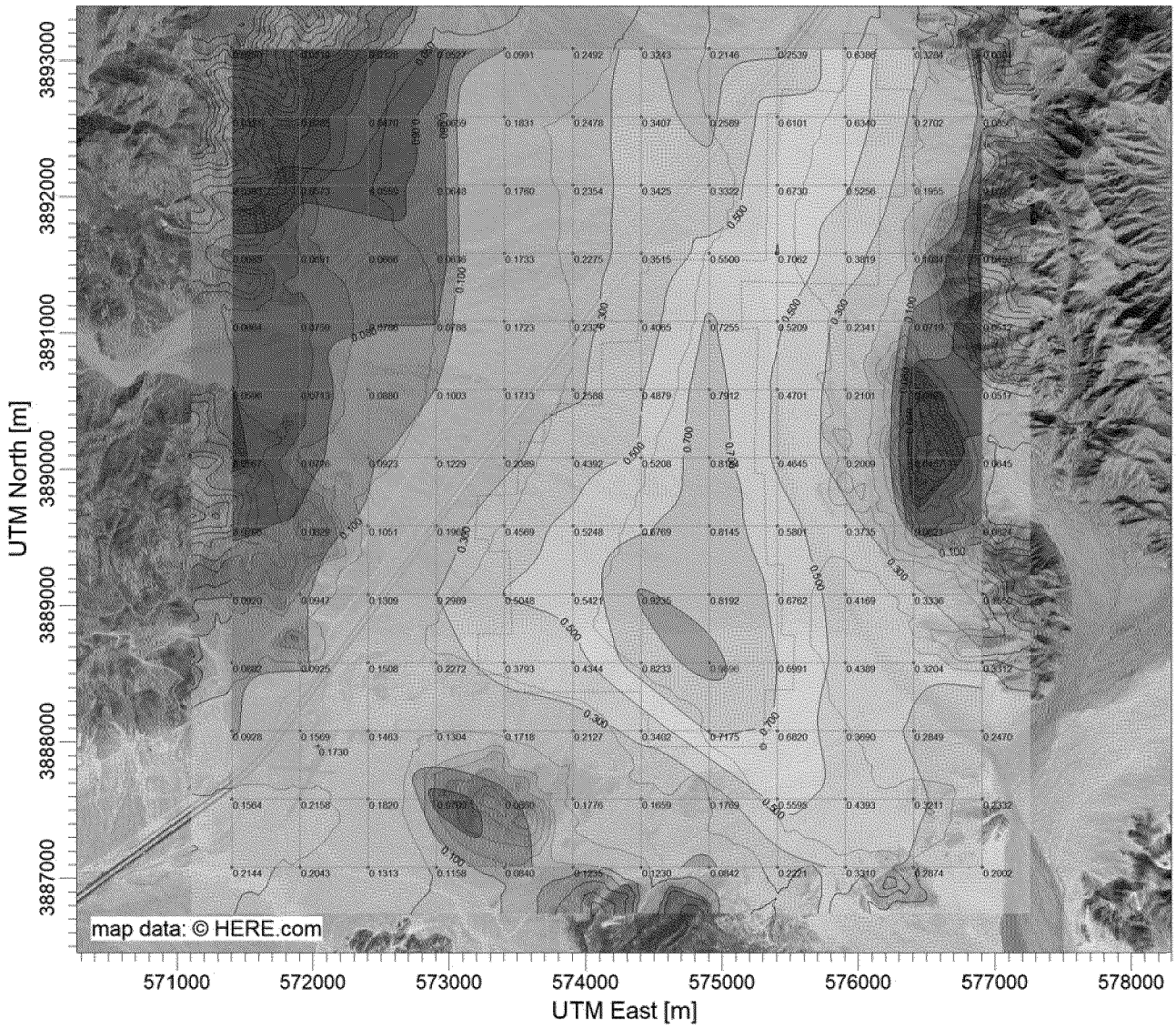
6.7E-04 1.0E-03 4.0E-03 5.0E-03 6.0E-03 1.0E-02 4.0E-02 5.0E-02 6.0E-02 6.7E-02

COMMENTS: Annual PM2.5	SOURCES: **1**	COMPANY NAME: **Baseline Environmental Consulting**	
	RECEPTORS: **157**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:50,433 0 2 km	
	MAX: **6.7E-02 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

PROJECT TITLE:

Soda Mountain Solar Project
Construction - PM10



PLOT FILE OF HIGH 1ST HIGH 24-HR VALUES FOR SOURCE GROUP: ALL ug/m^3

Max: 0.970 [ug/m^3] at (574905.52, 3888583.87)

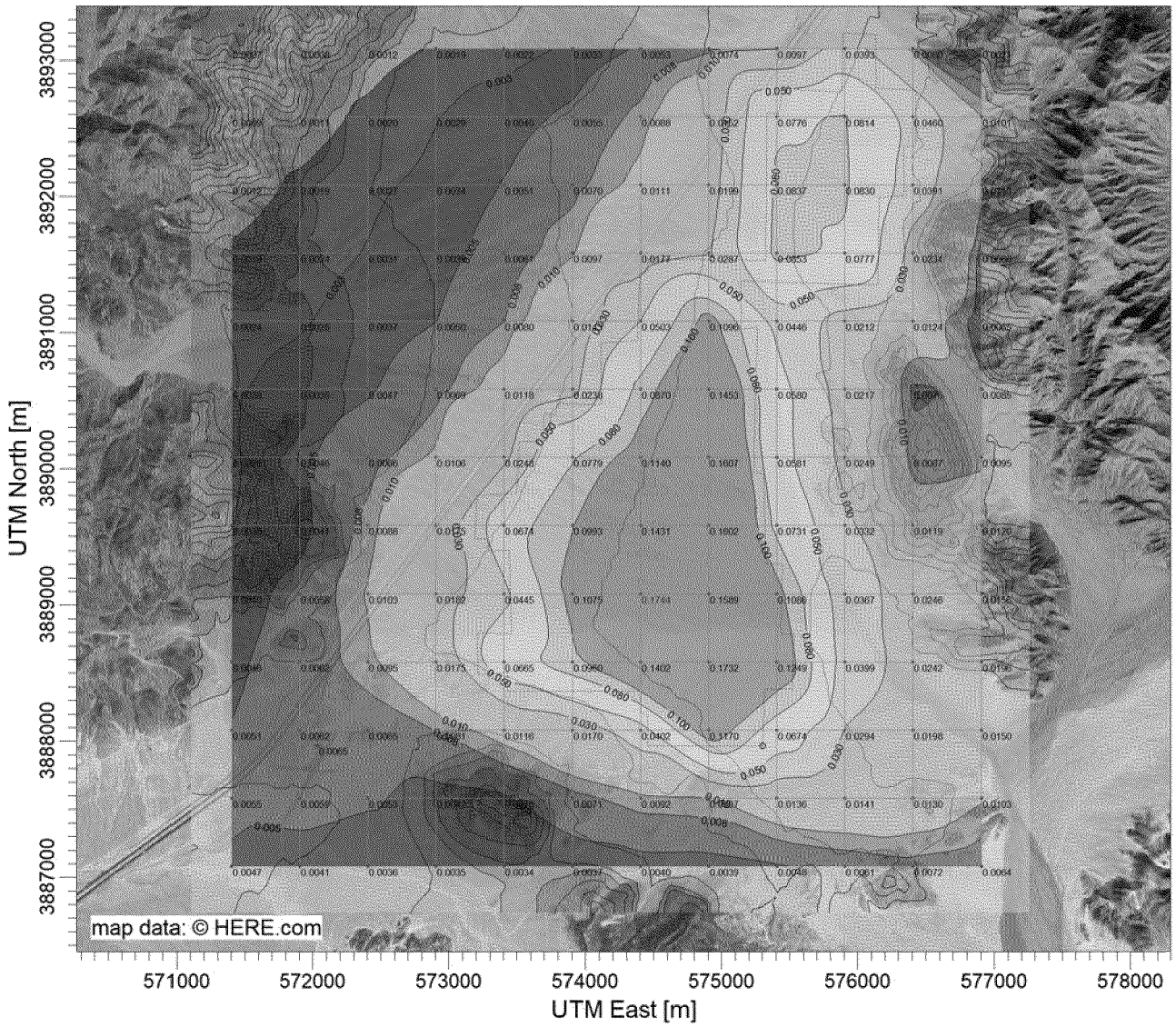
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COMMENTS: 24-hour PM10	SOURCES: **1**	COMPANY NAME: **Baseline Environmental Consulting**	
	RECEPTORS: **157**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:50,442 (0 — 2 km)	
	MAX: **0.970 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

PROJECT TITLE:

Soda Mountain Solar Project
Construction - PM10



PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 1 YEARS FOR SOURCE GROUP: ALL ug/m^3

Max: 0.174 [ug/m^3] at (574405.52, 3889083.87)

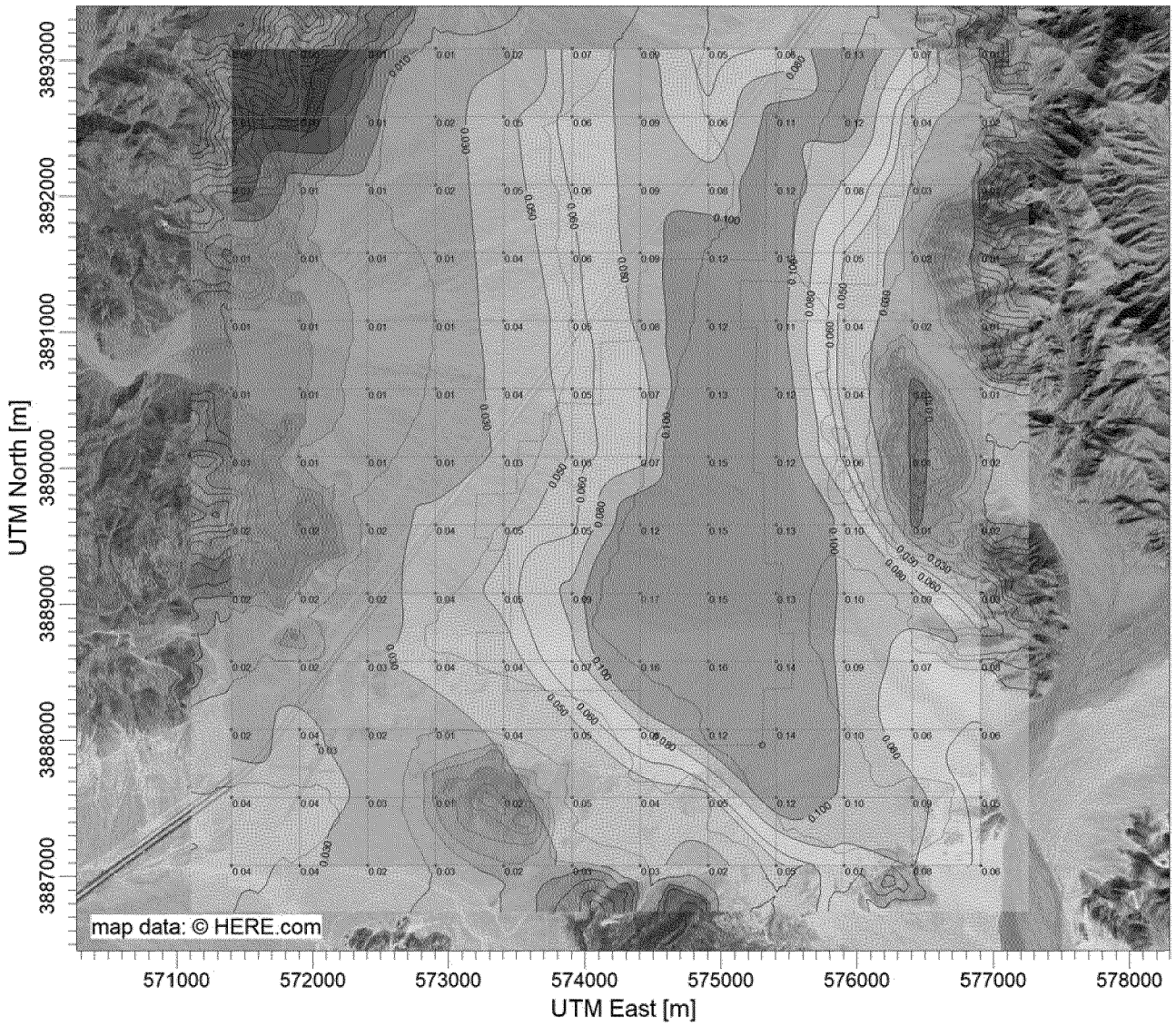
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COMMENTS: Annual PM10	SOURCES: **1**	COMPANY NAME: **Baseline Environmental Consulting**	
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	OUTPUT TYPE: **Concentration**	SCALE: 1:50,442 0 2 km	
	MAX: **0.174 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

PROJECT TITLE:

Soda Mountain Solar Project
Construction - SO2



PLOT FILE OF HIGH 1ST HIGH 1-HR VALUES FOR SOURCE GROUP: ALL ug/m^3

Max: 0.172 [ug/m^3] at (574405.52, 3889083.87)

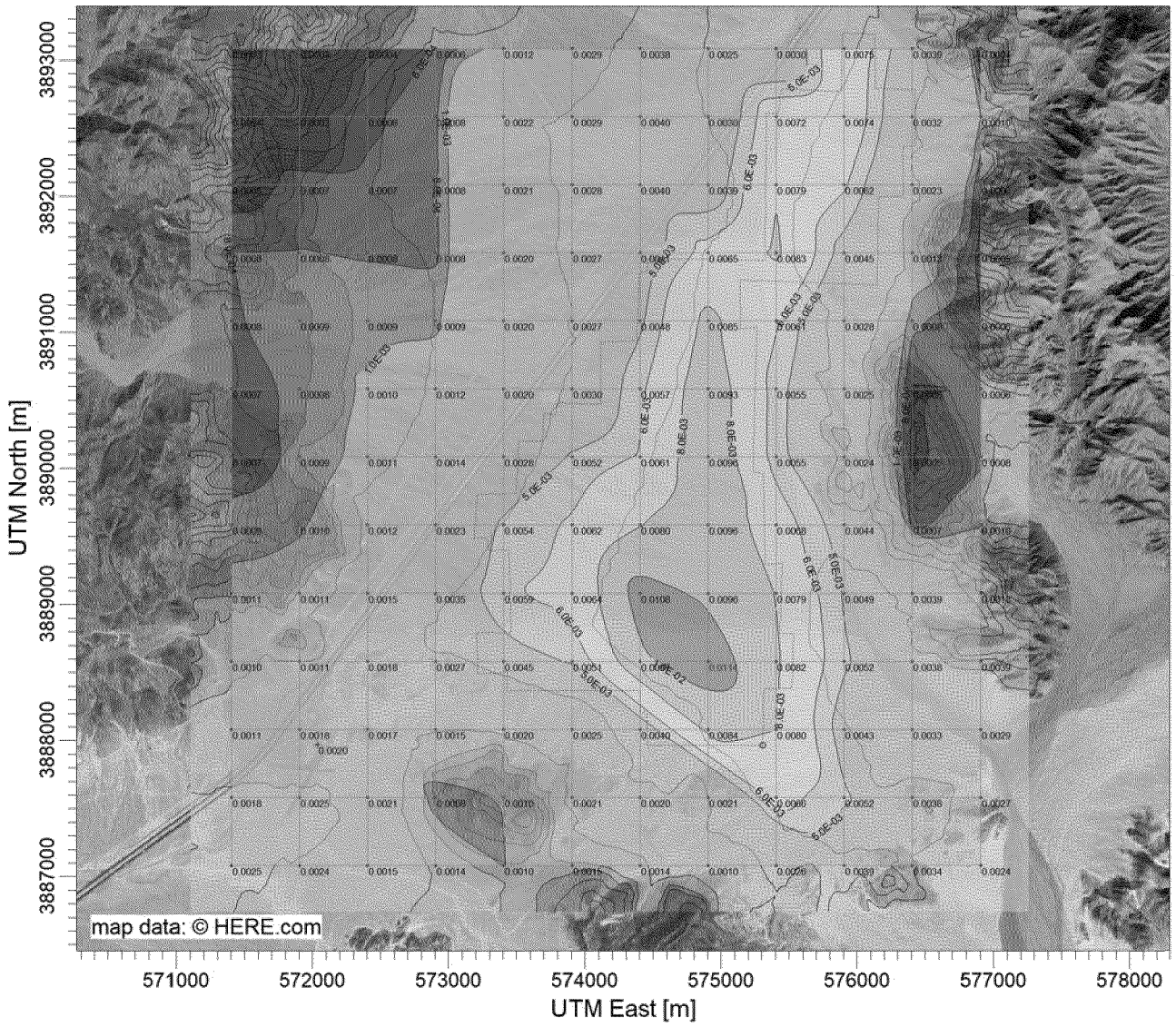
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COMMENTS: 1-hour SO2	SOURCES: **1**	COMPANY NAME: **Baseline Environmental Consulting**	
	RECEPTORS: **157**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:50,442 0 2 km	
	MAX: **0.172 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

PROJECT TITLE:

Soda Mountain Solar Project
Construction - SO2



PLOT FILE OF HIGH 1ST HIGH 24-HR VALUES FOR SOURCE GROUP: ALL ug/m^3

Max: 1.1E-02 [ug/m^3] at (574905.52, 3888583.87)

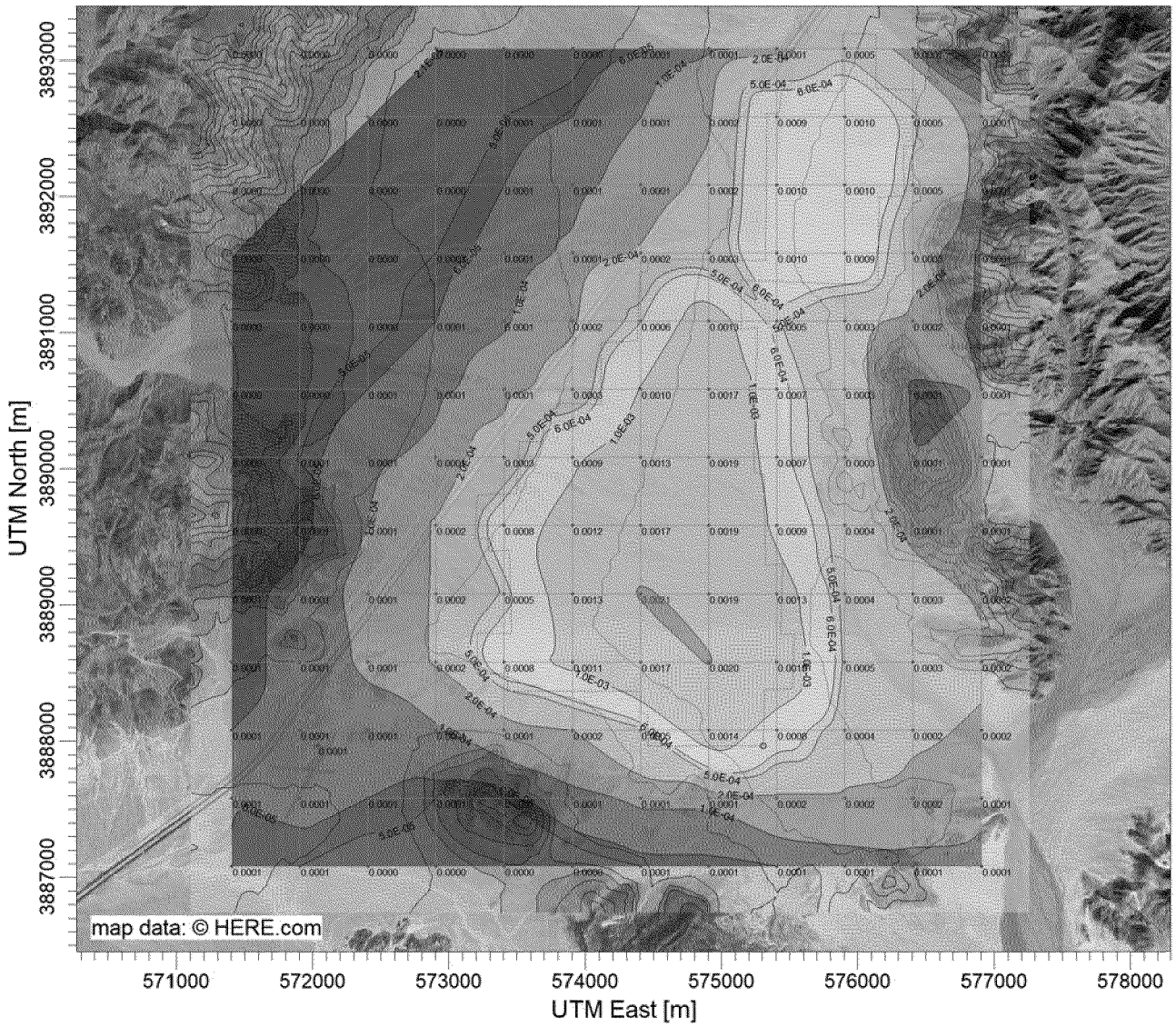
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COMMENTS: 24-hour SO2	SOURCES: **1**	COMPANY NAME: **Baseline Environmental Consulting**	
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	MAX: **1.1E-02 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

PROJECT TITLE:

Soda Mountain Solar Project
Construction - SO2



PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 1 YEARS FOR SOURCE GROUP: ALL ug/m^3

Max: 2.1E-03 [ug/m^3] at (574405.52, 3889083.87)

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COMMENTS: Annual SO2	SOURCES: **1**	COMPANY NAME: **Baseline Environmental Consulting**	
	RECEPTORS: **157**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:50,435 (0 — 2 km)	
	MAX: **2.1E-03 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

ATTACHMENT D
HARP INPUT DATA AND OUTPUT RESULTS
(ELECTRONIC VERSION PROVIDED SEPARATELY)

HARP Project Summary Report 10/24/2024 10:33:24 AM

PROJECT INFORMATION
HARP Version: 22118
Project Name: SODA MOUNTAIN SOLAR PROJECT_0612
Project Output Directory: C:\Users\Yilin\Baseline Environmental Consulting\BEC - 24208-00 SWCA Soda Mountain Solar\06 HARP\SODA MOUNTAIN SOLAR PROJECT_0612
HARP Database: NA

FACILITY INFORMATION
Origin
X (m):574295.49
Y (m):3889557.48
Zone:11
No. of Sources:0
No. of Buildings:0

EMISSION INVENTORY
No. of Pollutants:0
No. of Background Pollutants:0

Emissions

ScrID	StkID	ProID	PolID	PolAbbrev	Multi	Annual Ems (lbs/yr)	MaxHr Ems (lbs/hr)	MWAF

Background

PolID	PolAbbrev	Conc (ug/m^3)	MWAF

Ground level concentration files (\glc\)

POLLUTANT HEALTH INFORMATION
Health Database: C:\HARP2\Tables\HEALTH17320.mdb
Health Table Version: HEALTH22013
Official: True

PolID	PolAbbrev	InhCancer	OralCancer	AcuteREL	InhChronicREL	OralChronicREL	InhChronic8HRREL
9901	DieselExhPM	1.1			5		

AIR DISPERSION MODELING INFORMATION
Versions used in HARP. All executables were obtained from USEPA's Support Center for Regulatory Atmospheric Modeling website (http://www.epa.gov/scram001/)
AERMOD: 18081
AERMAP: 18081
BPIPPRM: 04274
AERPLOT: 13329

METEOROLOGICAL INFORMATION
Version:
Surface File:
Profile File:
Surface Station:
Upper Station:
On-Site Station:

LIST OF AIR DISPERSION FILES
AERMOD Input File:
AERMOD Output File:
AERMOD Error File:
Plotfile list

LIST OF RISK ASSESSMENT FILES
Health risk analysis files (\hra\)

AcuteNonCanerGLCList.csv
AcuteNonCanerHRAInput.hra
AcuteNonCanerNCAcuteRisk.csv
AcuteNonCanerNCAcuteRiskSumByRec.csv
AcuteNonCanerOutput.txt
AcuteNonCanerPathwayRec.csv
AcuteNonCanerPolDB.csv
CancerCancerRisk.csv
CancerCancerRisk.pdf
CancerCancerRiskSumByRec.csv
CancerGLCList.csv
CancerHRAInput.hra
CancerOutput.txt
CancerPathwayRec.csv
CancerPolDB.csv
ChronicGLCList.csv
ChronicHRAInput.hra
ChronicNCChronicRisk.csv
ChronicNCChronicRisk.pdf
ChronicNCChronicRiskSumByRec.csv
ChronicOutput.txt
ChronicPathwayRec.csv
ChronicPolDB.csv

Spatial averaging files (\sa\)

---

*HARP - HRACalc v22118 6/12/2024 12:26:41 PM - Cancer Risk - Input File: C:\Users\Yilin\Desktop\HARP2\Soda M\SODA MOUNTAIN SOLAR PROJECT_(

REC	GRP	NETID	X	Y	CONC	POLID	POLABBREV	RISK_SUM	SCENARIO	DETAILS	INH_RISK	SOIL_RISK
157	ALL		572037.5	3887971	0.00515	9901	DieselExhPM	3.80E-08	2YrCancerDerived_Inh_FAH16to70	*	3.80E-08	0.00E+00

)612\hra\CancerHRAInput.hra

DERMAL_RISK	MMILK_RISK	WATER_RISK	FISH_RISK	CROP_RISK	BEEF_RISK	DAIRY_RISK	PIG_RISK	CHICKEN_RISK	EGG_RISK	1ST_DRIVER	2ND_DRIVER
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	INHALATION	

*HARP - HRACalc v22118 6/12/2024 12:27:05 PM - Chronic Risk - Input File: C:\Users\Yilin\Desktop\HARP2\Soda M\SODA MOUNTAIN SOLAR PROJECT_0612

REC	GRP	NETID	X	Y	CONC	POLID	POLABBREV	SCENARIO	CV	CNS	IMMUN	KIDNEY	GILV
157	ALL		572037.5	3887971	0.00515	9901	DieselExhPM	erChronicD	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

\hra\ChronicHRAInput.hra

EPRO/DEVE	RESP	SKIN	EYE	BONE/TEETH	ENDO	BLOOD	ODOR	GENERAL	DETAILS	INH_CONC	SOIL_DOSE	ERMAL_DOS	MILK_DOSE
0.00E+00	1.03E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	*	5.15E-03	0.00E+00	0.00E+00	0.00E+00

VATER_DOS	FISH_DOSE	CROP_DOS	BEEF_DOSE	DAIRY_DOS	PIG_DOSE	IICKEN_DO	EGG_DOSE	LST_DRIVER	ND_DRIVE	3RD_DRIVER
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	NHALATION		

*HARP - HRACalc v22118 10/24/2024 10:29:44 AM - Acute Risk - Input File: C:\Users\Yilin\Baseline Environmental Consulting\BEC - 24208-00 SWCA Sc

REC	GRP	NETID	X	Y	CONC	POLID	POLABBREV	SCENARIO	CV	CNS	IMMUN
157	ALL		572037.5	3887971	2.15432	9901	DieselExhPM	NonCancerAcute	0.00E+00	0.00E+00	0.00E+00

›da Mountain Solar\06 HARP\SODA MOUNTAIN SOLAR PROJECT_0612\hra\AcuteNonCanerHRAInput.hra

KIDNEY	GILV	EPRO/DEVE	RESP	SKIN	EYE	BONE/TEETH	ENDO	BLOOD	ODOR	GENERAL
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

APPENDIX C

Baseline Environmental Consulting Supplemental Air Quality Analysis for Battery Energy Storage System Thermal Runaway Event

BASELINE ENVIRONMENTAL CONSULTING

MEMORANDUM

Date: July 17, 2025 **Job No.:**24208-00

To: Erin Wielenga, SWCA Environmental Consultants

From: Patrick Sutton, Baseline Environmental Consulting
Yilin Tian, Baseline Environmental Consulting

Subject: Supplemental Air Quality Analysis for Battery Energy Storage System Thermal Runaway Event, Soda Mountain Solar Project, San Bernardino County, California

In June 2024, Baseline Environmental Consulting (Baseline) prepared an Air Quality Technical Report for the Soda Mountain Solar Project (project) located in unincorporated San Bernardino County, California. The purpose of the Air Quality Technical Report was to support an Application for Certification (AFC) for the project, focusing on the California Energy Commission's (CEC) requirements in Appendix B of the AFC Program Guidance under sections (g)(8)(H) through (g)(8)(I) and sections (g)(9)(A) through (g)(9)(D). Based on review of the air quality analysis results, CEC has requested preparation of an air dispersion modeling analysis and health risks assessment for a potential thermal runaway event during operation of the Battery Electric Storage System (BESS) at the project site.

Baseline has prepared this technical memorandum to provide a supplemental analysis of potential air quality impacts related to a thermal runaway event at the project site. A thermal runaway event in a BESS occurs when a damaged lithium-ion battery cell releases flammable or toxic gases, triggering a chain reaction that can potentially spread to adjacent cells. The scope of this supplemental analysis for a BESS thermal runaway event includes the following:

- Estimated mass emissions of criteria air pollutants and toxic air contaminants (TACs);
- Modeled concentrations of criteria air pollutants and TACs at nearby receptors;
- Evaluation of criteria air pollutant impacts that would cause or contribute to any exceedance of ambient air quality standards; and
- Evaluation of potential adverse health effects to nearby sensitive receptors from acute exposure to TACs.

PROJECT DESCRIPTION

The project proposes to construct, operate, maintain, and decommission a proposed 300-megawatt (MW) photovoltaic (PV) solar facility located on approximately 2,670 acres. The approximate disturbance acreage for the project would be 2,081 acres. As shown in **Figure 1**, the project components include the solar plant site, operation and maintenance buildings and

structures, stormwater infrastructure and related infrastructure/improvements, a substation and switchyard, and an approximately 300-MW BESS.

Battery Energy Storage System

A BESS absorbs, holds, and then reinjects energy from the PV system into the electrical grid. The project is anticipated to include up to 300 MW/1,200 MWh of energy for dispatch into the local electrical grid via the same point of interconnection as the solar arrays. The BESS would be located adjacent to the substation and Area 1. Up to 18 acres may be utilized for the BESS throughout the project site at full buildout.

Batteries

Individual lithium-ion cells typically form the core of the BESS and are assembled in sealed battery modules. The battery modules would be installed in self-supporting racks electrically connected either in series or parallel to each other. The operating rack-level DC voltage currently ranges between 700 and 1,500 volts (V). The individual battery racks are connected in series or a parallel configuration to deliver the BESS energy and power rating.

Battery Energy Storage System Enclosure and Controller

The BESS containers would house the batteries described above, as well as the BESS unit controllers. There would also be a site controller, located in a pad mount enclosure within the BESS yard. The BESS site controller is a multilevel control system for the battery modules, power conversion system, medium-voltage system, and up to the point of connection with the electrical grid. The controllers ensure that the BESS effectively mimics conventional turbine generators when responding to grid emergency conditions. The BESS enclosure would also house the required heating, ventilation, and air conditioning (HVAC) and fire protection systems. The battery storage containers would be built using standard International Organization for Standardization (ISO) shipping containers, and each would measure approximately 20 feet in length, 6 feet in width, and 8 feet in height, although other smaller form-factor structures exist that may be used. The containers would be painted Sudan Brown.

The safety system would include a fire detection, alarm, and suppression control system that would be triggered automatically when the system senses imminent fire danger. A fire suppression control system would be provided within each on-site battery enclosure. The safety system would use either a waterless evaporating fluid, a sustainable clean agent (not a hydrofluorocarbon clean agent), or an alternative suppression agent, such as inert gas. The control system would also notify the project operators and could be configured to notify local first responders as well.

BASIC LITHIUM-ION BATTERY CONCEPT

A lithium-ion battery mainly consists of a positive electrode (cathode), a negative electrode (anode), a lithium-ion-conducting electrolyte, and a separator to prevent short circuits. The anode and cathode store lithium. The electrolyte enables the transfer of positively charged lithium ions between the anode and cathode through a separator. As lithium ions move, they generate free electrons at the anode, creating an electric charge at the positive current collector. During charging, lithium ions migrate from the cathode to the anode, while electrons flow into the battery via an external circuit. This process is reversed during discharge, with lithium ions returning to the cathode and electrons flowing out to power a device.

Thermal runaway in lithium-ion batteries refers to a chain reaction of exothermic chemical processes within the cell, leading to a rapid and uncontrollable rise in temperature and internal pressure. Lithium-ion battery thermal runaway could result in the venting of flammable and/or toxic gases, and may ultimately result in a fire and explosion. Thermal runaway is typically triggered by one of three forms of failure, including mechanical (e.g., mechanical damage causing deformation or puncture), electrical (e.g., overcharging, over-discharging, and external short-circuit), and thermal (e.g., overheating and high ambient temperature).

PROJECT LOCATION AND NEARBY SENSITIVE RECEPTORS

The project site is located in unincorporated San Bernardino County, California, approximately 50 miles northeast of Barstow. 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. The project is not situated close to any non-residential sensitive receptors, such as schools, hospitals, daycare centers, or long-term care establishments. As discussed in the Air Quality and Greenhouse Gas Technical Report for the project prepared by SWCA in March 2024 (Air Quality Report),[1] the closest residences to the project location can be found next to the Rasor Road service station, roughly 260 feet southwest of the proposed boundary. This area encompasses a stand-alone house and accommodation for four workers.

METHODOLOGY

Under normal operation, the BESS would not emit any criteria air pollutants or TACs. As mentioned above, the BESS enclosure would house the required HVAC and fire protection systems. The HVAC system would maintain the suitable operating temperature within the BESS enclosure, while the fire protection system is designed to either prevent thermal runaway from occurring in the cell or prohibit the propagation of thermal runaway to adjacent cells. This

[1] SWCA, 2024. Air Quality and Greenhouse Gas Technical Report for the Soda Mountain Solar Project, San Bernardino County, California. March,

analysis assumed a highly unlikely, worst-case scenario in which all control systems fail, and a thermal runaway fire-event occurs within the BESS enclosure.

Emission Estimation Methods

[redacted]

Concentration Estimation Methods

Air dispersion modeling of the project's criteria air pollutant (CO) and TAC emissions from a thermal runaway event were conducted using the EPA's atmospheric dispersion modeling system (AERMOD). Emissions from the thermal runaway event were modeled as a point source

[2] Ramboll. 2024. Offsite Consequence Analysis for Vistra Morro Bay Battery Energy Storage System (BESS) Project. March

located at the southwest corner of the proposed BESS yard, resulting in the shortest distance between the source and the nearest sensitive receptor of about 2.9 miles to the southwest. The locations of the proposed BESS yard and the nearest sensitive receptor are illustrated in **Figure 1**.

The actual CO emission rate estimated based on the UL 9540A cell level testing results was used for the AERMOD run to estimate the maximum CO concentrations for the 1-hour and 8-hour averaging period. A unit emission rate (1 gram/second) was used for the AERMOD run to estimate the maximum concentrations of other pollutants for the 1-hour averaging period. The air dispersion results were then adjusted based on actual emission rates. The input parameters and assumptions used for estimating the dispersion of criteria air pollutants and TACs are included in **Table 1**.

A uniform grid of receptors spaced 500 meters apart was created for ground level receptors at heights of 1.5 meters to develop isopleths (i.e., concentration contours) around the project site that illustrate the general air dispersion pattern from the emissions sources. In addition, a discrete receptor was created for ground level receptors at heights of 1.5 meters to calculate concentrations at the nearest sensitive receptor. The AERMOD model input parameters included 1 year of meteorological data processed by the California Air Resources Board from the Barstow-Daggett Airport Meteorological Station (KDAG). The Barstow-Daggett Airport Meteorological Station is representative due to its proximity to the project site, similar complexity of the terrain and surrounding land use, and the time period of available data.

The input parameters and assumptions used for estimating concentrations at the nearest sensitive receptor from the dispersion of air pollutants during a thermal runaway event and the dispersion model results are included in **Attachment B**. The AERMOD files are submitted electronically as **Attachment C**.

Table 1. AERMOD Model Parameters and Assumptions

Source Type	Units	Value	Notes
Modeled Source Type: Stack (point)			
Variable Emissions: None			
Release Height	m	2.794	Approximate height of the enclosure.
Stack Diameter	m	0.825	Assumed to be half the depth of the enclosure (0.825 meters) to account for potential deterioration of the thermal roof.
Stack Temperature	K	900	Ramboll, 2024
Stack Velocity	m/s	0.207	Estimated based on the assumption that the total gas flow rate is equal to the flow rate required for 10 air changes per hour within the enclosure. (Ramboll, 2024)
Emission Rate - CO	g/s	0.736	Actual emission rate.
Emission Rate -Other	g/s	1	Unit emission rate.
Scaling Factor - Benzene	unitless	0.0004	Scaling factors were applied to adjust the AERMOD dispersion results from the unit emission rate scenario to reflect the actual emission rates of each pollutant.
Scaling Factor - Toluene	unitless	0.0005	
Scaling Factor - HF	unitless	2.1067	
Scaling Factor - HCL	unitless	0.4792	
Scaling Factor - HCN	unitless	0.2332	

Notes:
m = meter; K = kelvin; m/s = meter per second; g/s = gram per second
Sources:
Fire Protection Engineering and UL 9540A Interpretation Report (UL 9540A report).
Ramboll, 2024. Offsite Consequence Analysis for Vistra Morro Bay Battery Energy Storage System (BESS) Project. March

Thresholds of Significance

For risk assessment purposes, the non-cancer health effects on a specific organ system from acute exposure to an individual TAC is expressed as a hazard quotient (HQ), which is the 1-hour maximum concentration of the TAC divided by a corresponding acceptable exposure level, also known as an acute reference exposure level (REL)[3]. The acute RELs used to estimate the HQ for each TAC in this study are summarized in **Table 2**. The cumulative non-cancer health effects from acute exposure to all TACs is expressed as a hazard index (HI), which is the summation of all the HQs related to a specific organ system. To be conservative, this analysis sums all HQs regardless of variations in the target organ system. An acute HI greater than a threshold of 1.0 indicates there is a significant risk for adverse health effects. The acute HQs and HI from a

[3] RELs are airborne concentrations of a chemical that are not anticipated to result in adverse noncancer health effects for specified exposure durations in the general population, including sensitive subpopulations.

thermal runaway event at the nearest sensitive receptor were evaluated in accordance with guidance from the Office of Environmental Health Hazard Assessment (OEHHA).[4]

Table 2. OEHHA Acute Reference Exposure Levels

Pollutant	Unit	REL
Benzene	µg/m^3	27
Toluene	µg/m^3	5,000
HF	µg/m^3	240
HCL	µg/m^3	2,100
HCN	µg/m^3	340

Notes: OEHHA = Office of Environmental Health Hazard Assessment; REL = reference exposure level
Sources: OEHHA, 2020.

For criteria air pollutants, the estimated 1-hour and 8-hour concentrations of CO at the nearest sensitive receptor during a thermal runaway event were compared to the EPA's significant impact levels[5] (SILs). Concentration above the EPA SILs could cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS).

The thresholds of significance used in this analysis that are summarized in **Table 3**.

Table 3. Thresholds of Significance

Pollutant	Threshold Type	Unit	Threshold Value
TACs[1]	Acute HI	Unitless	1.0
CO, 1-hour average	EPA SIL	µg/m^3	2,000
CO, 8-hour average	EPA SIL	µg/m^3	500

Notes: HQ = hazard quotient; HI = hazard index; EPA = United States Environmental Protection Agency; SIL = significant impact level
[1] Based on sum of all hazard quotients.
Sources: OEHHA, 2020; 40 CFR 51.165(b).

RESULTS

Estimates of acute non-cancer health risks at the nearest sensitive receptor from exposure to thermal runaway emissions are summarized in **Table 4** and compared to the thresholds of significance. At the nearest sensitive receptor, the estimated acute HI for all the TACs from a thermal runaway event were below the threshold of significance. As a result, the project would

[4] Office of Environmental Health Hazard Assessment (OEHHA), 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. May.
[5] EPA SIL values provided in 40 CFR 51.165(b).

not expose sensitive receptors to substantial concentrations of hazardous air pollutants from a thermal runaway event.

Table 4. Acute Health Risks at the Nearest Sensitive Receptor during a Thermal Runaway Event

Pollutant	Concentration at Nearest Receptor ($\mu g/m^3$)	Acute Hazard Quotient
Benzene	0.007	0.0003
Toluene	0.009	<0.0001
HF[1]	37.79	0.1575
HCL[1]	8.60	0.0041
HCN[1]	4.18	0.0123
Hazard Index		**0.174**
Threshold Of Significance		**1.0**
Exceed Threshold?		**No**

Notes: $\mu g/m^3$ = micrograms per cubic meter

[1] According to the UL 9540A report, HF, HCL, and HCN would not be vented from the proposed project battery cell during a thermal runaway event. For informational purposes, emissions of HF, HCL, and HCN were evaluated using conservative empirical emission factors selected based on a review of available studies (Ramboll, 2024).
Source: Attachment B.

As presented in **Table 5**, the estimated concentrations of CO at the nearest sensitive receptor from a thermal runaway event would be below the EPA SILs. Therefore, the project's criteria air pollutant emissions during a thermal runaway event would not cause or contribute to an exceedance of the ambient air quality standards.

Table 5. Estimated Criteria Air Pollutant Concentrations at the Nearest Sensitive Receptor during a Thermal Runaway Event

Pollutant	Averaging Time	Concentration at Nearest Receptor ($\mu g/m^3$)	Threshold of Significance ($\mu g/m^3$)	Exceed Threshold?
Carbon Monoxide	1-Hour	13.2	2,000	No
	8-Hour	1.66	500	No

Notes: ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter
Source: Attachment B.

CONCLUSIONS

The criteria air pollutant emissions during a thermal runaway event at the project site would not cause or contribute to an exceedance of ambient air quality standards. In addition, the project would not expose sensitive receptors to substantial concentrations of hazardous air pollutants from a thermal runaway event.

FIGURE

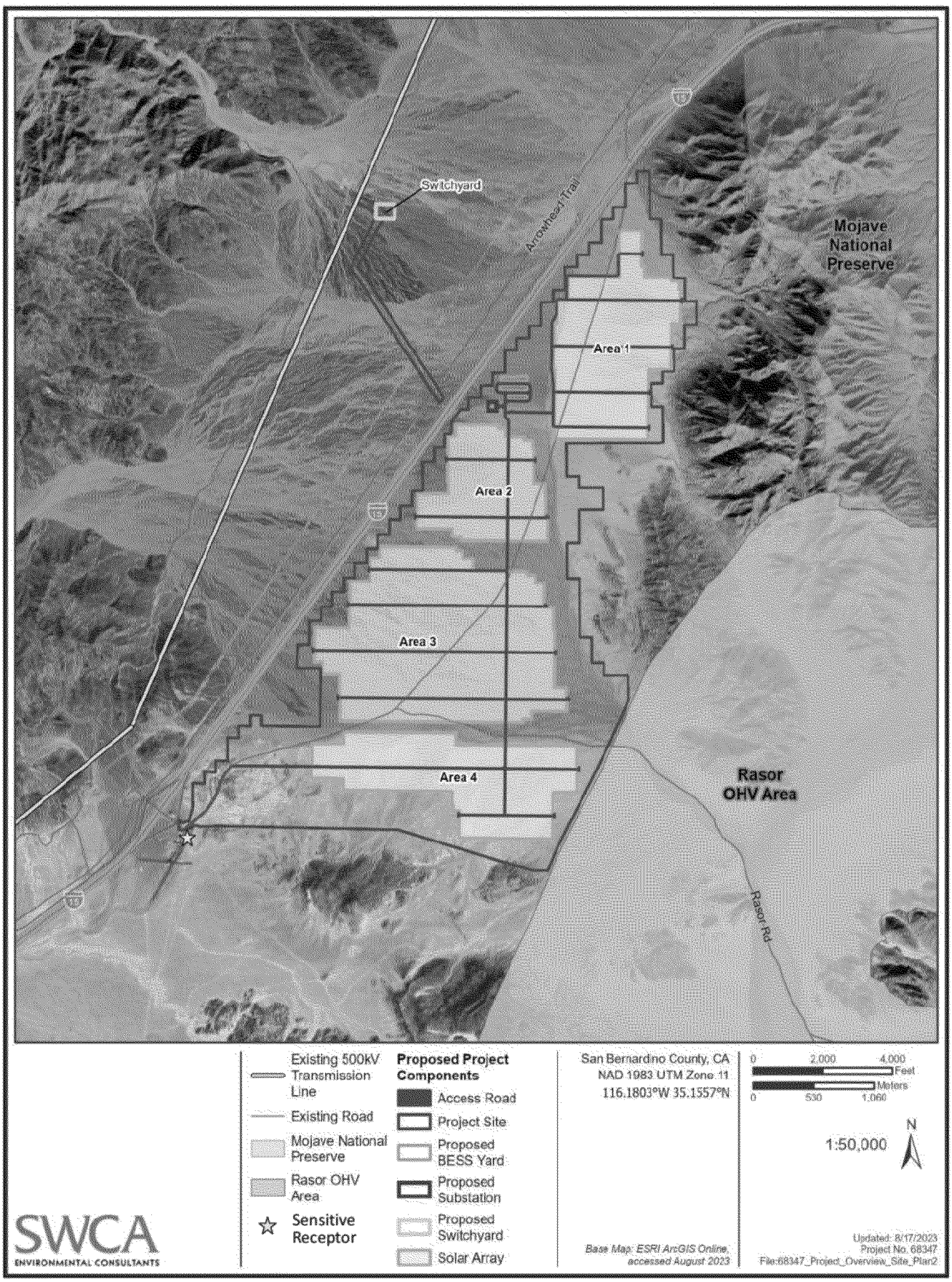


Figure 1. Sensitive Receptor Location

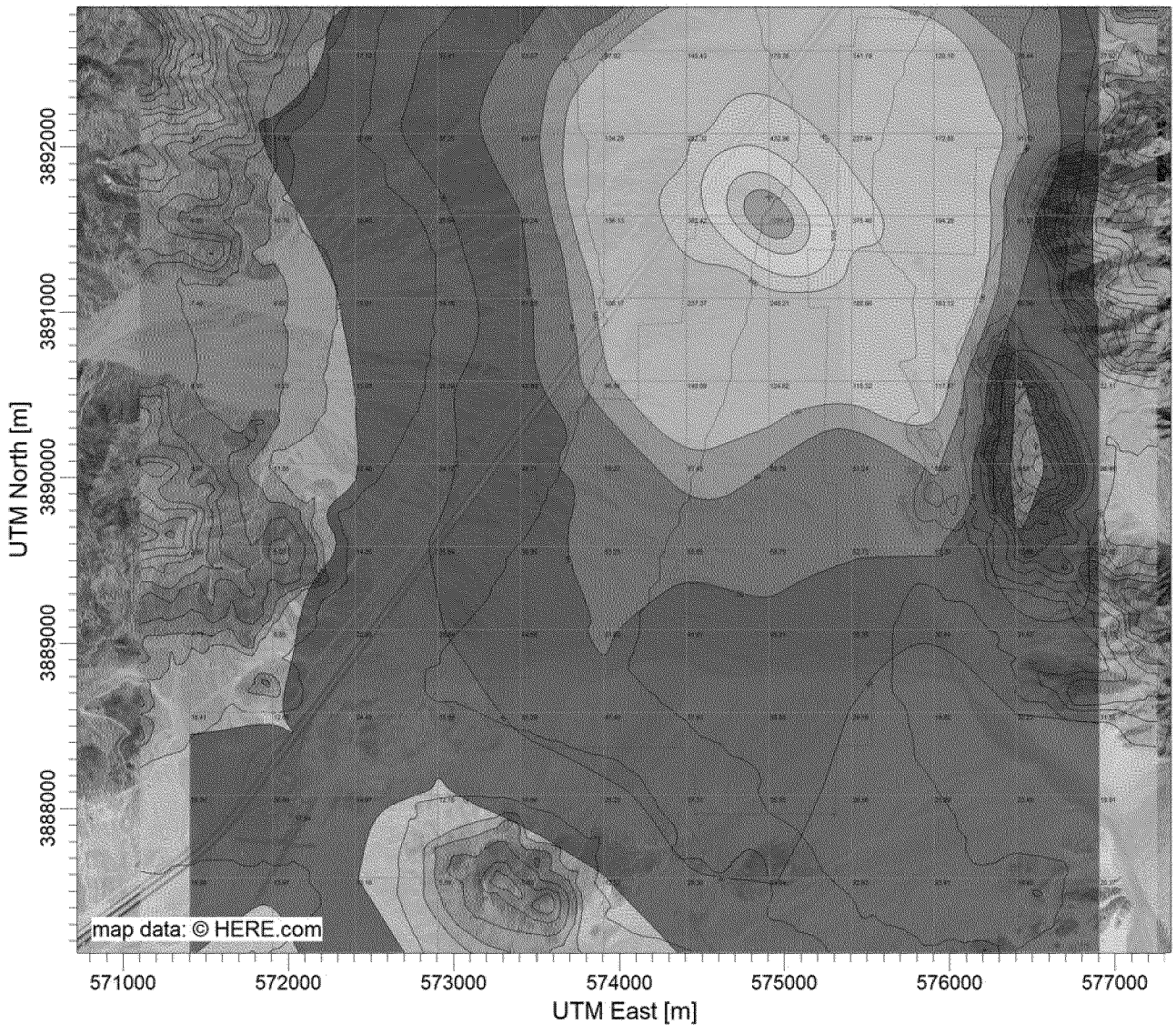
ATTACHMENT A
FIRE PROTECTION ENGINEERING AND UL 9540A INTERPRETATION REPORT
(CONFIDENTIAL)

ATTACHMENT B
THERMAL RUNAWAY EMISSION CALCULATIONS AND AERMOD INPUT PARAMETERS, ASSUMPTIONS, AND RESULTS

[redacted]

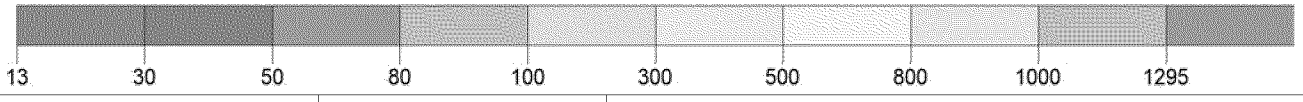
PROJECT TITLE:

Soda Mountain Solar Project
BESS - TACs



PLOT FILE OF HIGH 1ST HIGH 1-HR VALUES FOR SOURCE GROUP: BESS ug/m^3

Max: 1295 [ug/m^3] at (574905.52, 3891583.87)

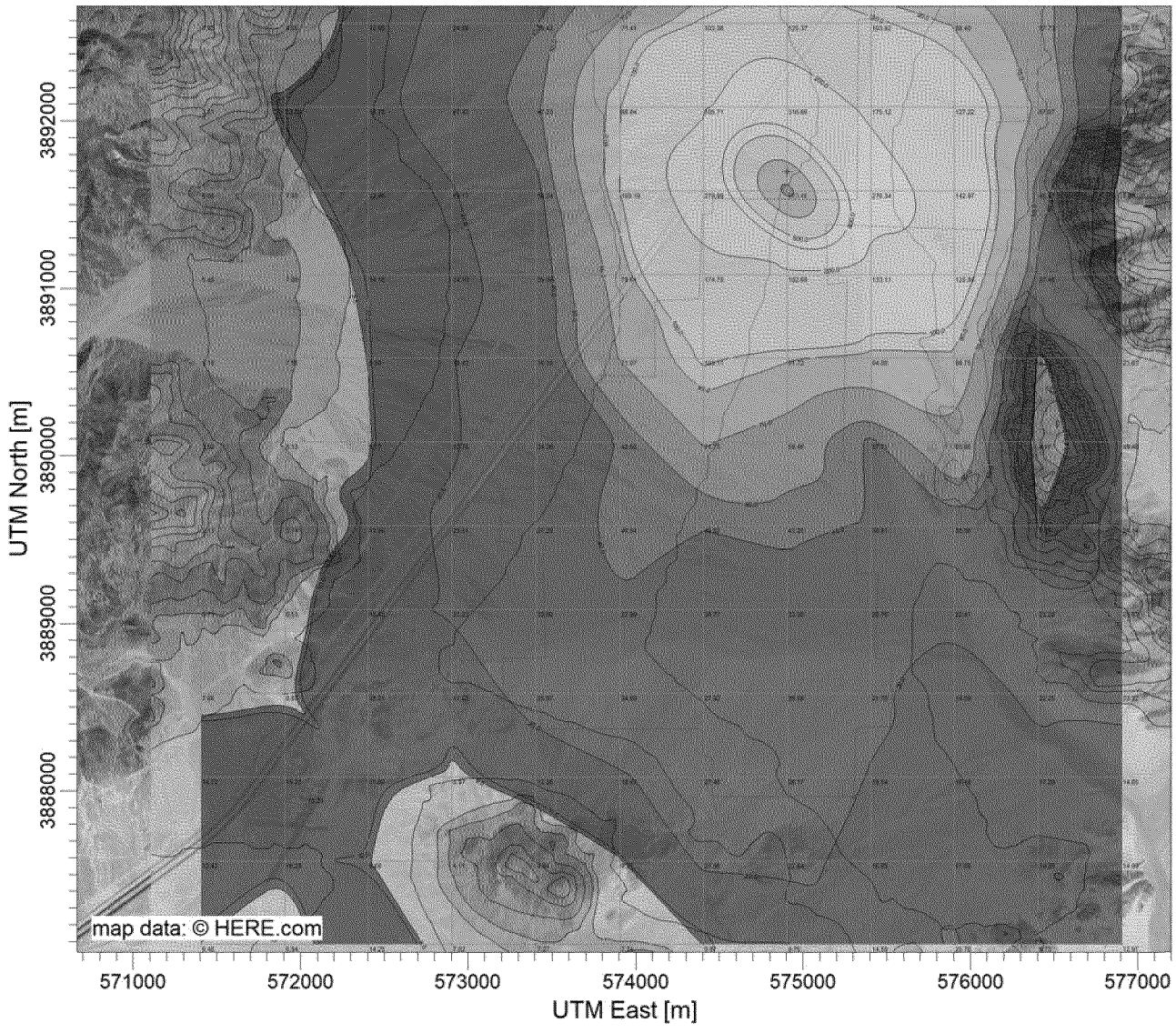


COMMENTS:	SOURCES:	COMPANY NAME:	
Concentrations based on unit emission rate (1 g/s)	**2**	**Baseline Environmental Consulting**	
	RECEPTORS: **157**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:41,607 0 1 km	
	MAX: **1295 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

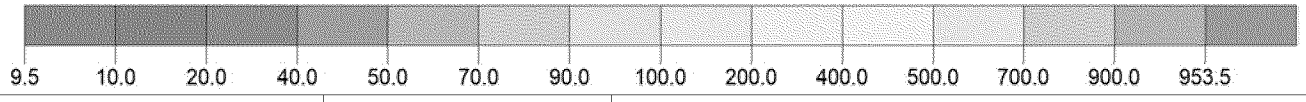
PROJECT TITLE:

Soda Mountain Solar Project
BESS - CO 1-HR



PLOT FILE OF HIGH 1ST HIGH 1-HR VALUES FOR SOURCE GROUP: BESS ug/m^3

Max: 953.5 [ug/m^3] at (574905.52, 3891583.87)

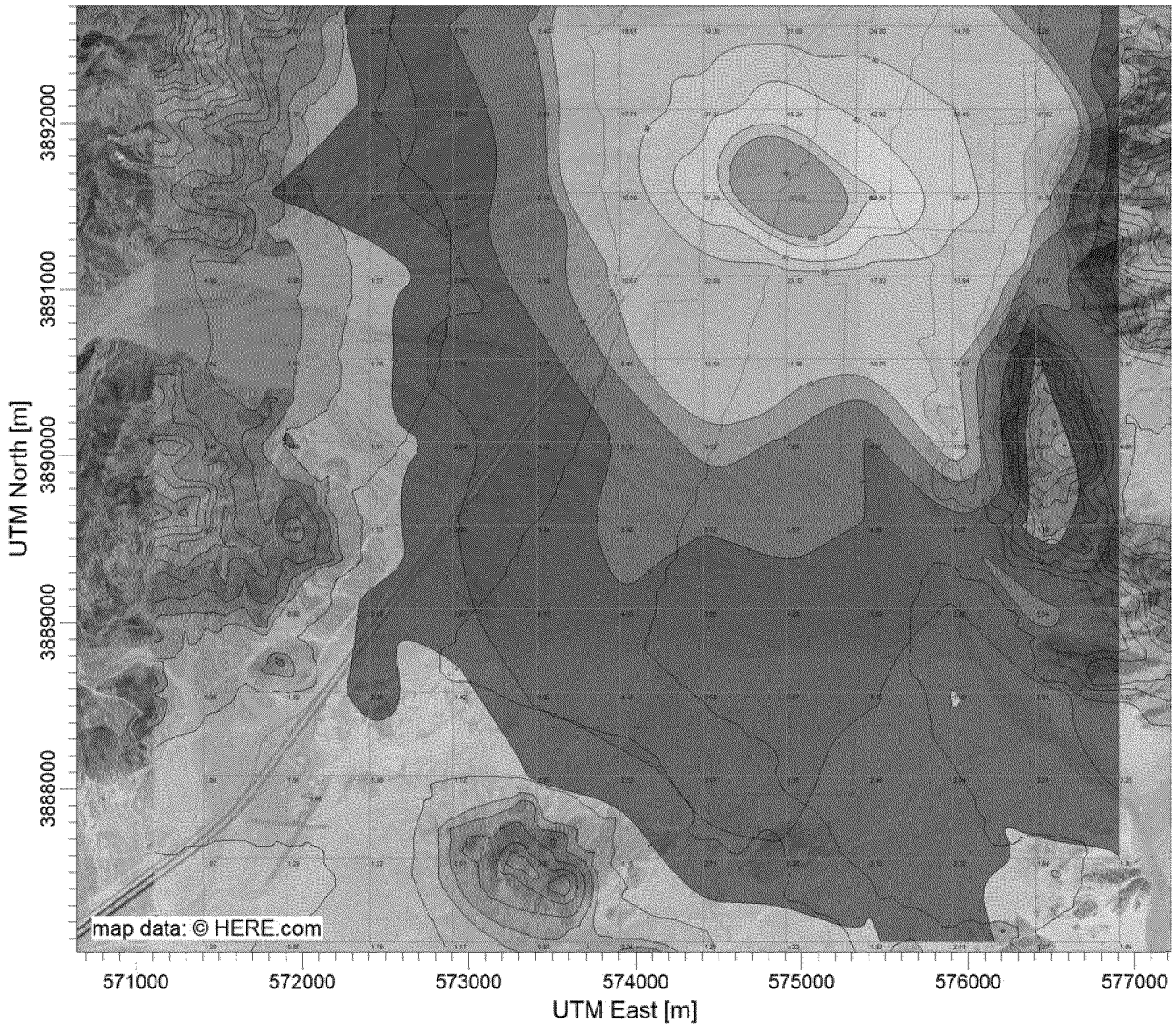


COMMENTS:	SOURCES:	COMPANY NAME:	
1-HR	**2**	**Baseline Environmental Consulting**	
	RECEPTORS: **157**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:41,091 0 1 km	
	MAX: **953.5 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

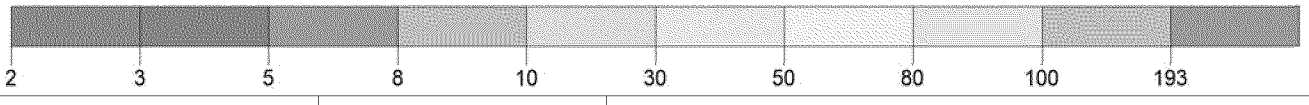
PROJECT TITLE:

Soda Mountain Solar Project
BESS - CO 8-HR



PLOT FILE OF HIGH 1ST HIGH 8-HR VALUES FOR SOURCE GROUP: BESS ug/m^3

Max: 193 [ug/m^3] at (574905.52, 3891583.87)



COMMENTS: 8-HR	SOURCES: **2**	COMPANY NAME: **Baseline Environmental Consulting**	
	RECEPTORS: **157**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:41,336 0 1 km	
	MAX: **193 ug/m^3**		PROJECT NO.: **24208-00**

AERMOD View - Lakes Environmental Software

ATTACHMENT C
AERMOD FILES
(ELECTRONIC VERSION)

APPENDIX D

CATL EnerC Plus BESS UL 9540A Test Report (Confidential)

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 7/29/2025 10:08:36 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Soda Mt. REV 2 DR LAND-2
Attachments: 3-11_Land Use & Planning_07-29-2025_CLEAN.docx; 3-11_Land Use & Planning_07-29-2025_redline.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

Attached and below is our response to REC 2 DR LAND-2. Many thanks to your team for all the hard work reviewing this project for us. Thank you! - Hannah

REV 2 DR LAND-2.	a. ***For each of the applicable CMAs from the DRECP LUPA and applicable IOPs from the West-Wide Energy Corridor ROD that are listed in Table 3.11-1 and Table 3.11-2 (TN 264863), explain clearly the specifics of project design measures or mitigation measures that would be implemented to ensure compliance with the requirements of the applicable CMA or IOP.*** For each applicable CMA or IOP, either a specific section (i.e., See Section 3-4, Biological Resources), APM (applicant-proposed measure), or MM (mitigation measure) is referenced, or a combination of the three. Some CMAs or IOPs are either too general or specific that there isn't one APM or MM that covers the exact wording but it may be discussed in the individual resource sections or appendices. b. ***Identify any new or revised IOPs from the Section 368 Energy Corridor Final Report that could be incorporated into the BLM's permit conditions for the project's ROW grant authorization.*** The 2022 Section 368 Energy Corridor Final Report was reviewed, and the three recommended revisions and three recommended additions were incorporated into the appropriate sections of Table 3.11-2. If a suggested IOP was not applicable, this was noted in the table. For IOPs that could be applicable, information was added regarding their applicability, with the understanding that adoption as BMPs is at the BLM's discretion. Section 3.11 Land Use and Planning – July 2025 – Revision 3, Table 3.11-1 and Table 3.11-2

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

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. In April 2022, the BLM, U.S. Forest Service (USFS), and Department of Energy (DOE) issued a final report outlining the recommendations from the regional reviews for potential adjustments to the designated Section 368 energy corridors (BLM and USFS 2022). The final report included recommended revisions to the IOPs for the BLM to consider in future land use planning within designated Section 368 energy 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,

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

standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

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.

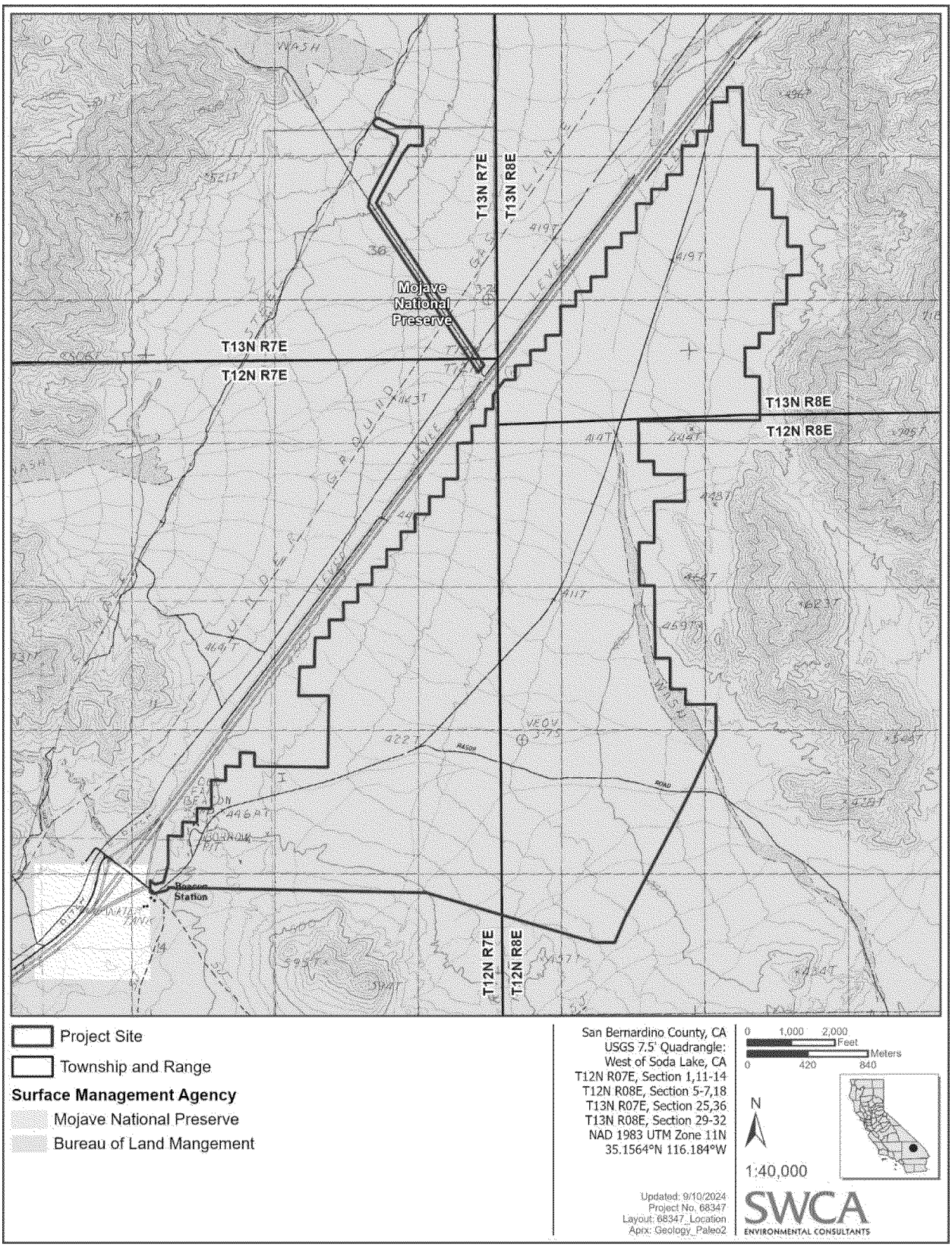


Figure 3.11-1. Project location and management agency.

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.

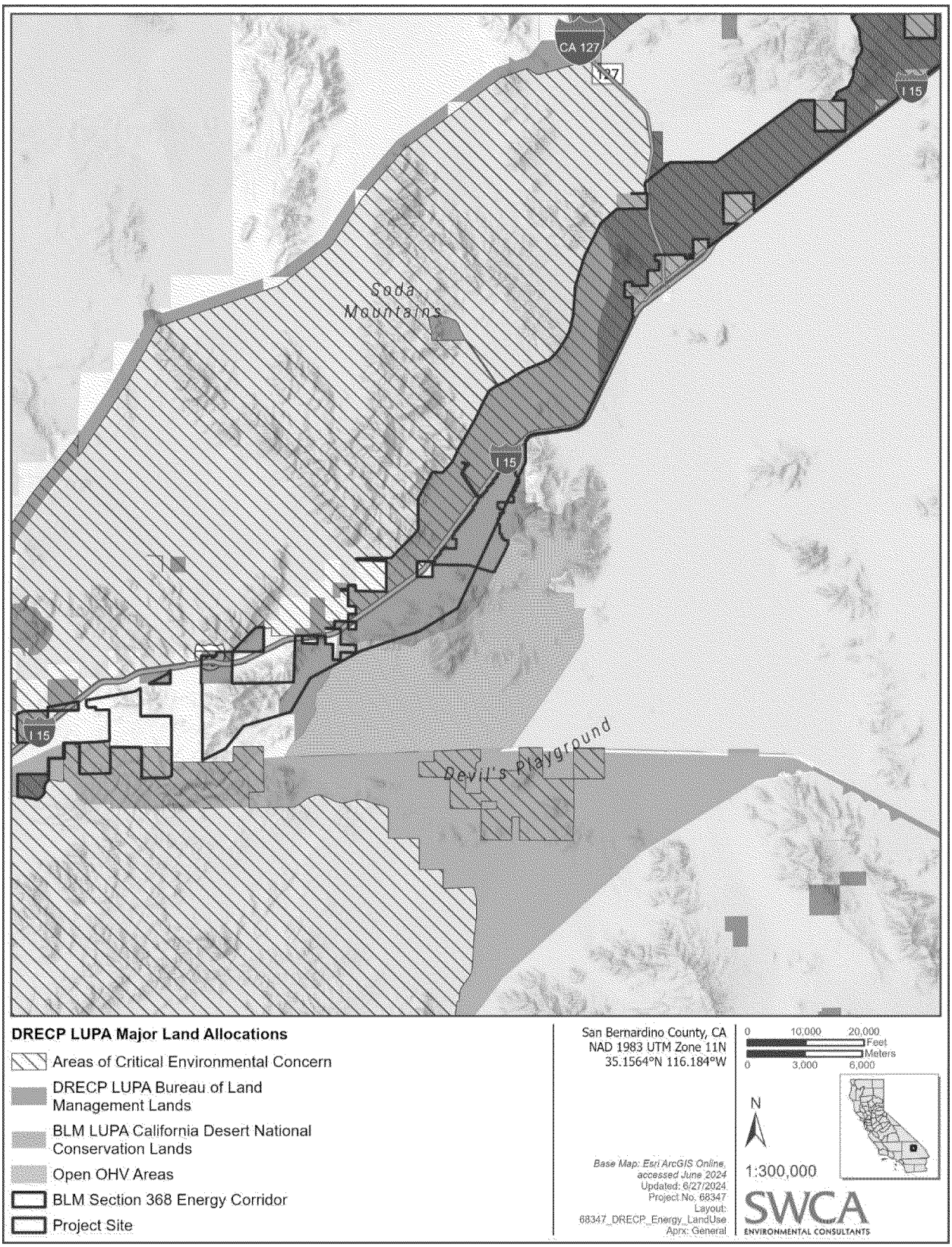


Figure 3.11-2. DRECP Land Use Allocations.

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. References to project specific Applicant-Proposed Measures (APMs) and Mitigation Measures (MMs) are included in the tables where applicable.

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,	**Consistent.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Multiple APMs and MMs apply to this CMA and those can be

DRECP CMA	CMA Summary	Consistency Determination
	Joshua tree, microphyll woodlands, carbon sequestration characteristics, seeps, climate refugia) if present using the most current information, data sources, and tools (e.g., DRECP land cover mapping, aerial photos, DRECP species models, and reconnaissance site visits) to identify suitable habitat (see Glossary of Terms) for Focus and BLM Special Status Species. …	found in Section 3.4.4.3 and 3.4.5, respectively.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Multiple APMs and MMs apply to this CMA and those can be found in Section 3.4.4.3 and 3.4.5, respectively.
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. § …	**Consistent.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Resource setbacks have been applied per the relevant protocols used to assess potential adverse impacts to biological resources. The setbacks described in the Biological Resources Technical Report include minor incursions that do not individually or cumulatively compromise the conservation objectives of that resource or rise to a level of significance that warrants development and application of more rigorous CMAs or a DRECP LUPA amendment.
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 following APMs and MMs address species-specific seasonal restrictions (Section 3.4.4.3 and 3.4.5): APM BIO-12 through 15, APM BIO-20, APM BIO-22 through 23, APM BIO-28 through 33, APM BIO-35, MM BIO-5 through 6, MM BIO-11, MM BIO-16, MM BIO-18, and MM BIO-21 through 24.
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 following APMs and MMs address a worker education program (Section 3.4.4.3 and 3.4.5): APM BIO-12 and MM BIO-6.
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	**Consistent**. The project would implement the APM BIO-34 regarding the Raven Monitoring and Control Plan listed in Section 3.4.4.3, Biological Resources.

DRECP CMA	CMA Summary	Consistency Determination
	Ravens. § …	
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 following APMs and MMs address vegetation removal (Section 3.4.4.3 and 3.4.5): APM BIO-1 through 9, APM BIO-13, APM BIO-20, MM BIO-3 though 4, MM BIO-6, MM BIO-18, MM BIO-21, MM BIO-28, and MM BIO-29.
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 following APMs and MMs address vegetation removal (Section 3.4.4.3 and 3.4.5): APM BIO-1, APM BIO-8 through 9, AMP BIO-27, APM BIO-33 through 34, MM BIO-4 through 6, and MM BIO-29.
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 following APMs and MMs address preventative practices for water and wetland dependent resources (Section 3.4.4.3 and 3.4.5): APM BIO-19, MM BIO-1, MM BIO-4, MM BIO-23, MM BIO-26, and MM BIO-28.
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 following APMs and MMs address integrated weed management actions (Section 3.4.4.3 and 3.4.5): APM BIO-3 through 6, and MM BIO-28.
LUPA-BIO-11	Implement the following CMAs for controlling nuisance animals and invasive species: …	**Consistent.** The following APMs and MMs address invasive species (Section 3.4.4.3 and 3.4.5): APM BIO-3, MM BIO-4, and MM BIO-28.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). See Section 3.4, Biological Resources. The following MMs address noise sources/controls (Section 3.4.5): MM BIO-11, MM BIO-17, MM BIO-20, and MM BIO-24.
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.** See Section 3.4, Biological Resources. The Applicant has identified and committed to implementing many APMs and MMs as part of the proposed Project to avoid or substantially lessen potentially significant impacts to biological resources, to the extent feasible (Section 3.4.4.3 and 3.4.5).

DRECP CMA	CMA Summary	Consistency Determination
LUPA-BIO-14	Implement the following general standard practices to protect Focus and BLM Special-Status Species: § …	**Consistent.** The following APMs and MMs address general standard practices for protecting focus and special-status species (Section 3.4.4.3 and 3.4.5): APM BIO-9, APM BIO-21, APM BIO-37, MM BIO-4 through 6, MM BIO-11, MM BIO-22, and MM BIO-28.
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.** While there is no specific APM or MM that addresses this CMA, Section2.4 addresses facility design which included the use of state-of-the-art construction and installation techniques.
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 following APMs and MMs address measures specific to BLM sensitive birds (Section 3.4.4.3 and 3.4.5): APM Bio 13 through 18, APM BIO-20, APM BIO-22 through 25, APM BIO-37, and MM BIO-17 through 21.
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 following MM addresses the Avian Monitoring and Mitigation Program (Section 3.4.5): MM BIO-17.
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.

DRECP CMA	CMA Summary	Consistency Determination
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 resource(s) for the activity-specific environmental analysis to determine: …	**Not applicable.** Sand dune vegetation types and Aeolian sand transport corridors are not present in the project area.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). The following APMs and MMs address measures specific to protocol surveys (Section 3.4.4.3 and 3.4.5): APM BIO-10 through 11, APM BIO-13. APM BIO-15, APM BI-20 through 23,

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		APM BIO-28 through 31, MM BIO-4 through 6, MM BIO-11, MM BIO-16 through 18, and MM BIO-21 through 22.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Field surveys confirmed the presence of one special-status plant, Utah vine milkweed. APM BIO-10 and MM BIO-4 provides for a 100-foot buffer surrounding the occurrence area where no construction activities can take place. The 100-foot setback was determined to be sufficient by a qualified botanist to protect ecological processes necessary to support Utah vine milkweed. The setback reflects a minor incursions that will not individually or cumulatively compromise the conservation objectives of Utah vine milkweed to a level of significance that warrants development and application of more rigorous CMAs or a DRECP LUPA amendment.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). The following APMs and MMs address measures specific to documented special status plant species (Section 3.4.4.3 and 3.4.5): APM BIO-10, and MM BIO-4 through 5.
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.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). No special vegetation features were recorded during field surveys conducted for the project.
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.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Yucca clones were not recorded during field surveys conducted for the project.
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.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Creosote bush rings were not recorded during field surveys conducted for the project.
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.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Saguaro cacti were not recorded during field surveys conducted for the project.
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).	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Joshua tree woodlands were not recorded during field surveys conducted for the project.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Microphyll woodlands

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		were not recorded during field surveys conducted for the project.
LUPA-BIO-SVF-7	Crucifixion thorn stands: (Castela emoryi Shrubland Special Stands) Crucifixion thorn stands with greater than 100 individuals will be avoided.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Crucifixion thorn stands were not recorded during field surveys conducted for the project.
LUPA-BIO-VEG-1	Management of cactus, yucca, and other succulents will comply with current up-to-date BLM policy.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). No special vegetation features were recorded during field surveys conducted for the project.
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 following APMs and MMs address measures specific to the collection of plant material (Section 3.4.4.3 and 3.4.5): APM BIO-2 and MM BIO-4.
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 following MM addresses measures specific to salvage and transplant of cactus, yucca, and other succulents (Section 3.4.5): MM BIO-4.
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.** Although APMs and MMs are included in Sections Section 3.4.4.3 and 3.4.5 for desert tortoise, 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 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. …	**Not applicable.** Although APMs and MMs are included in Sections Section 3.4.4.3 and 3.4.5 for desert tortoise the project is not located in desert tortoise conservation 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 following APMs and MMs address measures specific to desert tortoise (Section 3.4.4.3 and 3.4.5): APM BIO-28 through 33, APM BIO-36, MM BIO-5, MM BIO-8, MM BIO-10 through 15, and MM BIO-28.

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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.** Although APMs and MMs are included in Sections Section 3.4.4.3 and 3.4.5 for desert tortoise, 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.** Although APMs and MMs are included in Sections Section 3.4.4.3 and 3.4.5 for desert tortoise, 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.** Although APMs and MMs are included in Sections Section 3.4.4.3 and 3.4.5 for desert tortoise, 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 following APMs and MMs address measures specific to a designated biologist being present during on-site activities (Section 3.4.4.3 and 3.4.5): APM BIO-33, MM BIO-5, MM BIO-11, MM BIO-13 and MM BIO-28.
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 following APMs and MMs address measures specific to desert tortoise and exclusion fencing (Section 3.4.4.3 and 3.4.5): APM BIO-28, APM BIO-32, MM BIO-8, MM BIO-11, MM BIO-13, and MM BIO-28.
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.	**Consistent.** The following APMs and MMs address measures specific to wildlife and speed limits (Section 3.4.4.3 and 3.4.5): APM BIO-26 and MM BIO-10.
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.
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	**Consistent.** The following APMs and MMs address measures specific to burrowing owls monitoring (Section 3.4.4.3 and 3.4.5):

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	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.	APM BIO-14, MM BIO-5, MM BIO-9, MM BIO-17, and MM BIO-21.
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 following APMs and MMs address measures specific to avoiding burrowing owl burrows (Section 3.4.4.3 and 3.4.5): APM BIO-22, APM BIO-35, MM BIO-5, and MM BIO-21.
LUPA-BIO-IFS-14	Activity-specific active translocation of burrowing owls may be considered, in coordination with CDFW.	**Not applicable.** No translocation of burrowing owls is currently being considered under the proposed action.
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.	**Not applicable.** The project is not within the range of the California Condor.
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.	**Not applicable.** The project is not within the range of the California Condor.
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.

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LUPA-BIO-IFS-22	Operations and/or activities that reach an activity-specified trigger for condor injury and/or mortality as determined by BLM and USFWS, and CDFW as appropriate, will curtail operations and/or activities using best available techniques, as determined by BLM and USFWS, and CDFW as appropriate. (An example of a 2015 curtailment strategy is shutting down wind generation operations when condor(s) are present, or wind generation facilities switching to night operations only.) If curtailment techniques are not viable or available, then operations and/or activities will be suspended until the injury and/or condor mortality issue is resolved to the satisfaction of BLM and USFWS, and CDFW, as appropriate.	**Not applicable.** The project is not within the range of the California Condor.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the

DRECP CMA	CMA Summary	Consistency Determination
		California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. A permit for golden eagle take is expected for this project.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18.
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**. Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18.

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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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. A permit for golden eagle take is expected for this project.
LUPA-BIO-IFS-31	As determined necessary by BLM in coordination with USFWS, and CDFW as appropriate, for activities/projects that are likely to impact golden eagles implement site-specific golden eagle mortality monitoring in support of the pre-construction, pre-activity risk assessment surveys.	**Consistent**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18.
LUPA-BIO-IFS-32	Avoid use of rodenticides and insecticides within five miles of active Swainson's hawk nest.	**Not applicable.** Swainson's hawk nests have not been documented in the project area.
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 following MMs address measures specific to bighorn sheep (Section 3.4.5): MM BIO-8, MM BIO-23, and MM BIO-26.
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 following MMs address measures specific to bighorn sheep (Section 3.4.5): MM BIO-8, MM BIO-23, and MM BIO-26.
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.

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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 following MMs address measures specific to compensation ratios (Section 3.4.5): MM BIO-6, MM BIO-14, MM BIO-21, and MM BIO-27.
LUPA-BIO-COMP-2	Birds and Bats – The compensation for the mortality impacts to bird and bat Focus and BLM Special Status Species from activities will be determined based on monitoring of bird and bat mortality and a fee re-assessed every 5 years to fund compensatory mitigation. The initial compensation fee for bird and bat mortality impacts will be based on pre-project monitoring of bird use and estimated bird and bat species mortality from the activity. The approach to calculating the operational bird and bat compensation is based on the total replacement cost for a given resource, a Resource Equivalency Analysis. This involves measuring the relative loss to a population (debt) resulting from an activity and the productivity gain (credit) to a population from the implementation of compensatory mitigation actions. The measurement of these debts and gains (using the same "bird years" metric as described in Appendix D) is used to estimate the necessary compensation fee. …	**Consistent.** The following MM addresses measures specific to compensation for bird and bat Focus and special status species (Section 3.4.5): MM BIO-21.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging

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		habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. A permit for golden eagle take is expected for this project.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. A permit for golden eagle take is expected for this project.
LUPA-AIR-1:	All activities must meet the following requirements: ▪ Applicable National Ambient Air Quality Standards (Section 109) ▪ State Implementation Plans (Section 110) …	**Consistent.** Section 3.3, Air Quality covers the applicable national, state, and local requirements for air quality. The project construction-source and operational-source air pollutant emissions would not exceed applicable thresholds. However, the project would incorporate APMs AIR-1 through AIR-9 and MDAQMD (Rule 403.2) requirements to further reduce potential emissions.
LUPA-AIR-2:	Because project authorizations are a federal undertaking, air quality standards for fugitive dust may not exceed local standards and requirements.	**Consistent.** Section 3.3, Air Quality covers the applicable national, state, and local requirements for air quality. The project construction-source and operational-source air pollutant emissions would not exceed applicable thresholds. However, the project would incorporate APMs AIR-1 through AIR-9 and MDAQMD (Rule 403.2) requirements to further reduce potential emissions.
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	**Consistent.** Section 3.3, Air Quality covers the applicable national, state, and local requirements for air quality. The project construction-source and operational-source air pollutant emissions would not exceed applicable thresholds. However, the project would incorporate APMs AIR-1 through AIR-9 and MDAQMD (Rule 403.2) requirements to further reduce potential emissions.

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	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.	
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.** Section 3.3, Air Quality covers the applicable national, state, and local requirements for air quality. The project construction-source and operational-source air pollutant emissions would not exceed applicable thresholds. However, the project would incorporate APMs AIR-1 through AIR-9 and MDAQMD (Rule 403.2) requirements to further reduce potential emissions.
LUPA-AIR-5:	A fugitive Dust Control Plan will be developed for all projects where the NEPA analysis shows an impact on air quality from fugitive dust.	**Not applicable.** NEPA analysis has indicated that there will not be an impact on air quality from fugitive dust.
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.	**Not applicable.** The project does not fall within an SRMA, ERMA, OHV Open Area, or Level 1-3 Recreation Facility.
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 project would utilize Rasor Road as the primary access road into the site, which also provides access to the Rasor OHV recreation area. The project would close Rasor Road during the approximately 18 months of project construction for site security, and for the duration of the project's anticipated 35-year operations. Public access to the Rasor OHV recreation area would be maintained from the Basin Road exit on I-15, as well as from the Rasor Road exit via existing primitive BLM motorized routes such as AC8825, reducing potential impacts to recreation facilities and maintaining off-road vehicles access. The project would implement APM REC-1 to communicate any access changes to the public. See Section 3.16, Recreation.
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.
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 project would implement APM REC-1 listed in Section 3.16, Recreation.
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 APM REC-1 listed in Section 3.16, Recreation.

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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. Applicable APMs include APM CUL-1 through 3.
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. Applicable APMs include APM CUL-1 through 3.
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.** 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.
LUPA-CUL-4	Design activities to minimize impacts on cultural resources including places of traditional cultural and religious importance to federally recognized 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.
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 APM REC-1 listed in Section 3.16, Recreation.
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. 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

DRECP CMA	CMA Summary	Consistency Determination
		Section 3.5, Cultural Resources. Applicable APMs include APM CUL-1 through 3.
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.** 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.
LUPA-CUL-8	Conduct regular contact and consultation with federally recognized Tribes and individuals, consistent with statute, regulation and policy.	**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.
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.** 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.
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 Ocotillo Wells SRMA (refer to the Ocotillo Wells SRMA Special Unit Management Plan in Appendix C).	**Not applicable**. The project area is not located in land use allocations where renewable energy and ancillary facilities are not allowed.
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.

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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 project site was selected given the BLM's issuance of a ROD and associated amendment to the CDCA Plan in March 2016. The site is located within a designated federal Section 368 Energy Corridor adjacent to I-15 (Corridor number 27-225). Additionally, an existing SCE-owned 115-kV sub-transmission line and an LADWP-operated 500-kV transmission line run parallel to and adjacent to the western perimeter of the project site.
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.
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	**Not applicable**. The project area is not located within any grazing allotments. See Section 3.2, Agriculture and Forestry Resources.

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	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.	
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.	**Not applicable.** The project site is not located within a County-designated MRZ, and the BLM does not identify the project site as one with high mineral potential. The potential for mineral development in the future, after the use of the site for a solar project, will remain the same as under the existing setting, and the BLM could allow for future development of mining projects if a claim were requested. 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.
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.

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LUPA-NRT-2	The Nadeau NRT Management Corridor will be protected and activities impacting use and enjoyment of the trail will be avoided within 0.5 mile from centerline of the route.	**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 3.22, Paleontological Resources, APMS GEO-7 through 11.
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, APMS GEO-7 through 11.
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 3.22, Paleontological Resources, APMS GEO-7 through 11.
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 3.22, Paleontological Resources, APMS GEO-7 through 11.
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 and APM
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,

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		Recreation and Section 3.11, Land Use Planning.
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 3.4, 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 requirements, such as buffer zones and setbacks, may be based, in part, on the results of the Water Supply Assessment defined below. In general, placement of long-term facilities within buffers or protected zones for soil and water resources is discouraged, but may be permitted if soil and water resource management objectives can be maintained.	**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.

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LUPA-SW-9	The extent of desert pavement within the proposed boundary of an activity shall be mapped if it is anticipated that the activity may create erosional or ecologic impacts. Mapping will use the best available data and standards, as determined by BLM. Disturbance of desert pavement within the boundary of an activity shall be limited to the extent possible. If disturbance from an activity is likely to exceed 10% of the desert pavement mapped within the activity boundary, the BLM will determine 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.	**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-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).	**Not applicable.** The project is not located in the vicinity of playas or wild and scenic river corridors.
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. See Section 3.10 Hydrology and Water Quality.
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	**Consistent.** The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.

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	waters from the proposed activity shall be mitigated to ensure no net loss of function and value, as determined by the BLM.	
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.
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	**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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	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.	
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.
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

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		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 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 project site was selected given the BLM's issuance of a ROD and associated amendment to the CDCA Plan in March 2016. The site is located within a designated federal Section 368 Energy Corridor adjacent to I-15 (Corridor number 27-225). Additionally, an existing SCE-owned 115-kV sub-transmission line and an LADWP-operated 500-kV transmission line run parallel to and adjacent to the western perimeter of the project site.
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.** See MM BIO-20 on the Bird and Bat Conservation Strategy in Section 3-4, Biological Resources.

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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 project site was selected given the BLM's issuance of a ROD and associated amendment to the CDCA Plan in March 2016. The site is located within a designated federal Section 368 Energy Corridor adjacent to I-15 (Corridor number 27-225). Additionally, an existing SCE-owned 115-kV sub-transmission line and an LADWP-operated 500-kV transmission line run parallel to and adjacent to the western perimeter of the project site.
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 project site was selected given the BLM's issuance of a ROD and associated amendment to the CDCA Plan in March 2016. The site is located within a designated federal Section 368 Energy Corridor adjacent to I-15 (Corridor number 27-225). Additionally, an existing SCE-owned 115-kV sub-transmission line and an LADWP-operated 500-kV transmission line run parallel to and adjacent to the western perimeter of the project site.
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 regional impacts of the project. Refer to the NHPA Programmatic Agreement for details regarding the mitigation fee.	**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 cumulative or indirect adverse effects to historic properties See Section 3.5, Cultural Resources.
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. See Section 3.5, Cultural Resources.
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. See Section 3.5, Cultural Resources.
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. See Section 3.5, Cultural Resources.
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	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources

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	identified or forecast as sensitive for cultural resources by the BLM.	under CEQA, were identified within the project area. See Section 3.5, Cultural Resources.
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 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-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.
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.** Implementation of APM BIO-10, APM BIO-11, and APM BIO-12 as part of the project would avoid or substantially lessen potentially significant impacts to special-status plants, to the extent feasible.
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. See Section 3.4, Biological Resources.
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. See Section 3.4, Biological Resources.

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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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18.
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.
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	**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation and Section 3.11, Land Use and Planning.

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	California Desert National Conservation Lands/ACEC goals and objectives and as designated in Trails and Travel Management Plans (TTMPs) or Resource Management Plans (RMPs).	
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).	**Not applicable.** The project is not located in a SRMA or ERMA.
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. See Section 3.16, Recreation.
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 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.
ACEC-CUL-2	Update records for existing cultural resources within ACECs, prioritizing ACECs where the relevant and important criteria include cultural resources.	**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.
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 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

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		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.
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 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.
ACEC-CUL-5	Identify, develop or incorporate standard protection measures and best management practices to address threats.	**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.
ACEC-CUL-6	Where specific threats are identified, implement protection measures consistent with agency NHPA Section 106 responsibilities	**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.
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 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

DRECP CMA	CMA Summary	Consistency Determination
		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 project 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 project would not have a measurable adverse impact on the biological or cultural conservation strategies of the DRECP LUPA. See Sections 3.4 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 project would not have a measurable adverse impact to the recreation design of the DRECP LUPA. 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 not have a measurable adverse impact on the renewable energy and transmission design of the DRECP LUPA.
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. The infrastructure 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. See Section 2.3.1.1.
GPL-5	DRECP LUPA – Activities that may have a measurable (i.e. the effect can be evaluated) adverse impact (direct, indirect, or cumulative) on the LUPA-wide structure, and implementation of the DRECP LUPA are not allowed.	**Consistent**. The project would not have a measurable adverse impact on the implementation of the DRECP LUPA.
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	**Consistent.** The project would utilize Rasor Road as the primary access road into the site, which also provides access to the Rasor OHV recreation area. The project would close Rasor Road during the

DRECP CMA	CMA Summary	Consistency Determination
	recreation setting characteristics and access to recreation activities, facilities, and destination.	approximately 18 months of project construction for site security, and for the duration of the project's anticipated 35-year operations. Public access to the Rasor OHV recreation area would be maintained from the Basin Road exit on I-15, as well as from the Rasor Road exit via existing primitive BLM motorized routes such as AC8825, reducing potential impacts to recreation facilities and maintaining off-road vehicles access. The project would implement APM REC-1 to communicate any access changes to the public. 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 project would utilize Rasor Road as the primary access road into the site, which also provides access to the Rasor OHV recreation area. The project would close Rasor Road during the approximately 18 months of project construction for site security, and for the duration of the project's anticipated 35-year operations. Public access to the Rasor OHV recreation area would be maintained from the Basin Road exit on I-15, as well as from the Rasor Road exit via existing primitive BLM motorized routes such as AC8825, reducing potential impacts to recreation facilities and maintaining off-road vehicles access. The project would implement APM REC-1 to communicate any access changes to the public. 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. 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-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.

DRECP CMA	CMA Summary	Consistency Determination
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 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.

DRECP CMA	CMA Summary	Consistency Determination
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 following APMs and address impacts to visual and aesthetic resources (Section 3.1.3.2): APM AES-1 through 5.
GPL-REC-2	Avoid large-scale ground disturbance within one-half mile of Level 3 Recreation facility footprint including route access and staging areas. If avoidance isn't practicable, the facility must be relocated to the same or higher standard and maintain recreation objectives and setting characteristics.	**Not applicable.** The project is not within 0.5 miles of a Level 3 Recreation Facility.
GPL-REC-3	When considering large-scale development in the GPL areas, retain to the extent possible existing, approved recreation activities.	**Not applicable.** The project would not impact existing, approved recreation activities. 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.	**Not applicable.** The project would not impact dispersed recreation activities. 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.

DRECP CMA	CMA Summary	Consistency Determination
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**. 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).
GPL-VRM-2	Required Visual Resource BMPs. All development will abide by the BMPs addressed in the most recent version of the document "Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands" or its replacement, including, but not limited to the following: …	**Consistent**. 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).
GPL-VRM-3	Regional mitigation is required for visual impacts in GPLs. Mitigation will be based on the VRI class and the underlying visual values (scenic quality, sensitivity, and distance zone) for the development area as it stands at the time the ROD is signed for the DRECP. …	**Consistent**. 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).
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.*		
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 lOPs from the WWEC ROD

WWEC ROD IOP	Consistency Determination
Regulatory Compliance	

WWEC ROD IOP	Consistency Determination
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.** 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.
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. See Section 3.4, Biological Resources and Appendix D, Biological Resources Technical Report.
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 planning process in order to identify appropriate aircraft safety requirements.	**Not applicable.** The project is not an electrical transmission project.
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. See Section 3.11.
Recommended Revision from the 2022 Section 368 Energy Corridor Review Finat Report (BLM and USFS 2022): In the existing IOP for agency coordination, consider adding text recommending height restrictions for new infrastructure within corridors near DoD training routes.	**Recommended but not required:** The project is not located on DOD-administered lands but there are three military installations located within a 25-mile radius of the project site. According to BLM and USFS (2022), this revised IOP could be adopted as a BMP at the BLM's discretion if

WWEC ROD IOP	Consistency Determination
Rationale: The existing IOP for agency coordination requires applicants to inform and coordinate with DoD regarding characteristics and locations of anticipated project infrastructure within corridors located on DoD-administered lands or near DoD facilities or flight training areas. The IOP could be expanded to include specific height restrictions for new infrastructure in those locations.	deemed appropriate; however, adoption is not required unless the WWEC ROD is amended.
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 for energy project siting, construction, and operation. See Section 2.
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.
8. Potential cumulative impacts to resources should be considered during the early stages of the project. Agency POCs must coordinate various	**Consistent.** The Applicant is coordinating with agency POCs and has prepared a cumulative

WWEC ROD IOP	Consistency Determination
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.	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. See Section 3.11.
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), congressionally authorized wild and scenic study rivers, and agency identified (eligible or suitable) wild and scenic study rivers in the vicinity of	**Not applicable.** The project is located near any designated wild or scenic rivers.

WWEC ROD IOP	Consistency Determination
a proposed project and design the project to avoid the rivers or mitigate the disturbance to the rivers and their vicinity.	
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.	**Not applicable.** The project is located near any designated wild or scenic rivers.
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.	**Not applicable.** There are no streams in the vicinity of the project area that have streams listed as impaired under Section 303(d) of the Clean Water Act (See: 2024 Integrated Report for the California Water Board)
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 and APMs GEO7 through 11.
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 and APMs GEO7 through 11.
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 and APMs GEO7 through 11.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Multiple APMs and MMs apply to this CMA and those can be found in Section 3.4.4.3 and 3.4.5, respectively.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Multiple APMs and MMs apply to this CMA and those can be found in Section 3.4.4.3 and 3.4.5, respectively.
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 Aquatic Resources Delineation Report has been prepared for the project

WWEC ROD IOP	Consistency Determination
and other aquatic habitats in the project area and design the project to avoid or mitigate impacts to these habitats.	(Appendix E-1). See Section 3.4, Biological Resources.
Recommended Addition from the 2022 Section 368 Energy Corridor Review Finat Report (BLM and USFS 2022): Consider adding subsections for habitat connectivity, migration corridors, sage-grouse habitat, and avian collision. Rationale: The existing IOPs for ecological resources focus on sensitive species, habitat restoration, and wetlands and other aquatic habitats. There is a need to address habitat connectivity, migration corridors, and avian collision, which are specific concerns for linear infrastructure that spans long distances. An IOP for sage-grouse would provide consistent management for sage-grouse by the BLM and USFS.	**Recommended but not required:** A Biological Resources Technical Report has been prepared for the project (Appendix D). See Section 3.4, Biological Resources which includes information on avian use, migration pathways, and habitat connectivity. According to BLM and USFS (2022), this revised IOP could be adopted as a BMP at the BLM's discretion if deemed appropriate; however, adoption is not required unless the WWEC ROD is amended.
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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). See Section 3.4, Biological Resources, and more specifically, APM BIO-6 and MM BIO-28
Recommended Revision from the 2022 Section 368 Energy Corridor Review Finat Report (BLM and USFS 2022): In the existing IOP for vegetation management, consider addressing additional active ingredients in pesticides in the Section 368 energy corridors on BLM-managed lands. Rationale: The existing IOP for vegetation management requires an integrated management plan and includes a subsection on pesticide use. The IOP could be expanded to address newly registered uses of three additional active ingredients in pesticides in Section 368 energy corridors on BLM-managed lands.	**Recommended but not required:** As new pesticide active ingredients are approved for use under NEPA, the BLM may select the most appropriate ingredient(s) for a given project. According to BLM and USFS (2022), this revised IOP could be adopted as a BMP at the BLM's discretion; however, adoption is not required unless the WWEC ROD is amended.
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.

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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 (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.	**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.
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.

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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 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).	**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. Additionally, 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 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. Additionally, 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.
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	**Consistent.** An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project

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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.	(Appendix G). See Sections 3.5, Cultural Resources and 3.18, Tribal Cultural Resources.
Recommended Addition from the 2022 Section 368 Energy Corridor Review Finat Report (BLM and USFS 2022): In addition to existing IOPs on government-to-government consultation, cultural resources, and Tribal traditional cultural uses, consider adding an IOP on working with Tribes to conduct ethnographic studies Rationale: The existing IOP for Tribal concerns focuses on government-to-government consultation, cultural resources, and traditional cultural uses, including 1) identifying sacred sites, sacred landscapes, gathering grounds, and burial areas and 2) avoiding minimizing, or mitigating impacts on those places in consultation with Tribes, project proponents, and other relevant parties. An additional IOP on working with the Tribes to conduct ethnographic studies would increase the BLM's and USFS's understanding of significant resources of concern to Tribes.	**Not applicable.** Tribal consultation did not indicate the need for an ethnographic study. According to BLM and USFS (2022), this revised IOP could be adopted as a BMP if the Tribes request an ethnography; however, adoption is not required unless the WWEC ROD is amended.
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.** A 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 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.	**Consistent.** A Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.
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,	**Consistent.** A Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.

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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.	
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.** A 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.** A 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.** A Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.
Recommended Revision from the 2022 Section 368 Energy Corridor Review Finat Report (BLM and USFS 2022): In the existing IOP for visual resources, consider adding a subsection regarding visual impact analysis. Rationale: The existing IOP for visual resources requires project proponents to identify and consider and prepare a plan for visual resource management (VRM) and scenery management (SMS), mitigate visual impacts and consider BMPs, and comply with VRM and SMS objectives. The IOP could be expanded to consider cumulative effects associated with energy development within Section 368 energy corridors and conformance with land use plans.	**Recommended but not required:** A Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics which includes a section on cumulative impacts. According to BLM and USFS (2022), this revised IOP could be adopted as a BMP at the BLM's discretion; however, adoption is not required unless the WWEC ROD is amended.
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 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	**Consistent.** See Sections 3.9, Hazards and 3.21, Public Health.

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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 outside or inside a corridor, and clarify who has responsibility for fire suppression and hazardous fuels reduction for the corridor.	**Consistent.** See Sections 3.9, Hazards and 3.20, Wildfire. Relevant APMs include: APM FIRE-1, AMP HAZ-1, and APM HAZ-3, APM BIO-1, APM BIO-2, APM BIO-7, APM BIO-9.
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. Relevant APMs include: APM FIRE-1, AMP HAZ-1, and APM HAZ-3, APM BIO-1, APM BIO-2, APM BIO-7, APM BIO-9.

[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.

WWEC ROD IOP	Consistency Determination
Lands with Wilderness Characteristics and Values	
Recommended Addition from the 2022 Section 368 Energy Corridor Review Finat Report (BLM and USFS 2022): Consider adding an IOP for lands with wilderness characteristics on BLM-managed lands and lands with wilderness character on USFS-managed lands. Rationale: There is no IOP for lands with wilderness characteristics or wilderness character. An IOP on this topic could provide consistent management of these federal lands by the BLM and USFS.	**Not Applicable:** The project is not located in an area managed for wilderness characteristics.
National Scenic Trails and National Historic Trails	
Recommended Addition from the 2022 Section 368 Energy Corridor Review Finat Report (BLM and USFS 2022): Consider adding a subsection for NSTs and NHTs. Rationale: There is no IOP for NSTs and NHTs. NSTs, NHTs, and Section 368 energy corridors are long, linear features that cross multiple jurisdictions. An IOP could provide guidance across agencies and jurisdictions where Section 368 energy corridors cross NSTs and NHTs.	**Not Applicable:** The project does not cross any designated National Scenic or Historic Trail.

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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Bureau of Land Management (BLM) and U.S. Forest Service (USFS). 2022. Energy Policy Act of 2005 Section 368 Energy Corridor Review Final Report: Regions 1 – 6. Available at: https://www.blm.gov/sites/blm.gov/files/docs/2022-04/Section%20368%20Energy%20Corridor%20Final%20Report_April_2022.pdf . Accessed July 2025.

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.

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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. In April 2022, the BLM, U.S. Forest Service (USFS), and Department of Energy (DOE) issued a final report outlining the recommendations from the regional reviews for potential adjustments to the designated Section 368 energy corridors (BLM and USFS 2022). The final report included recommended revisions to the IOPs for the BLM to consider in future land use planning within designated Section 368 energy 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,

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

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standards, policies, and plan proposals; diagrams and maps that incorporate data and analysis; and mitigation measures.

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.

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- 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.

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- **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.

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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.

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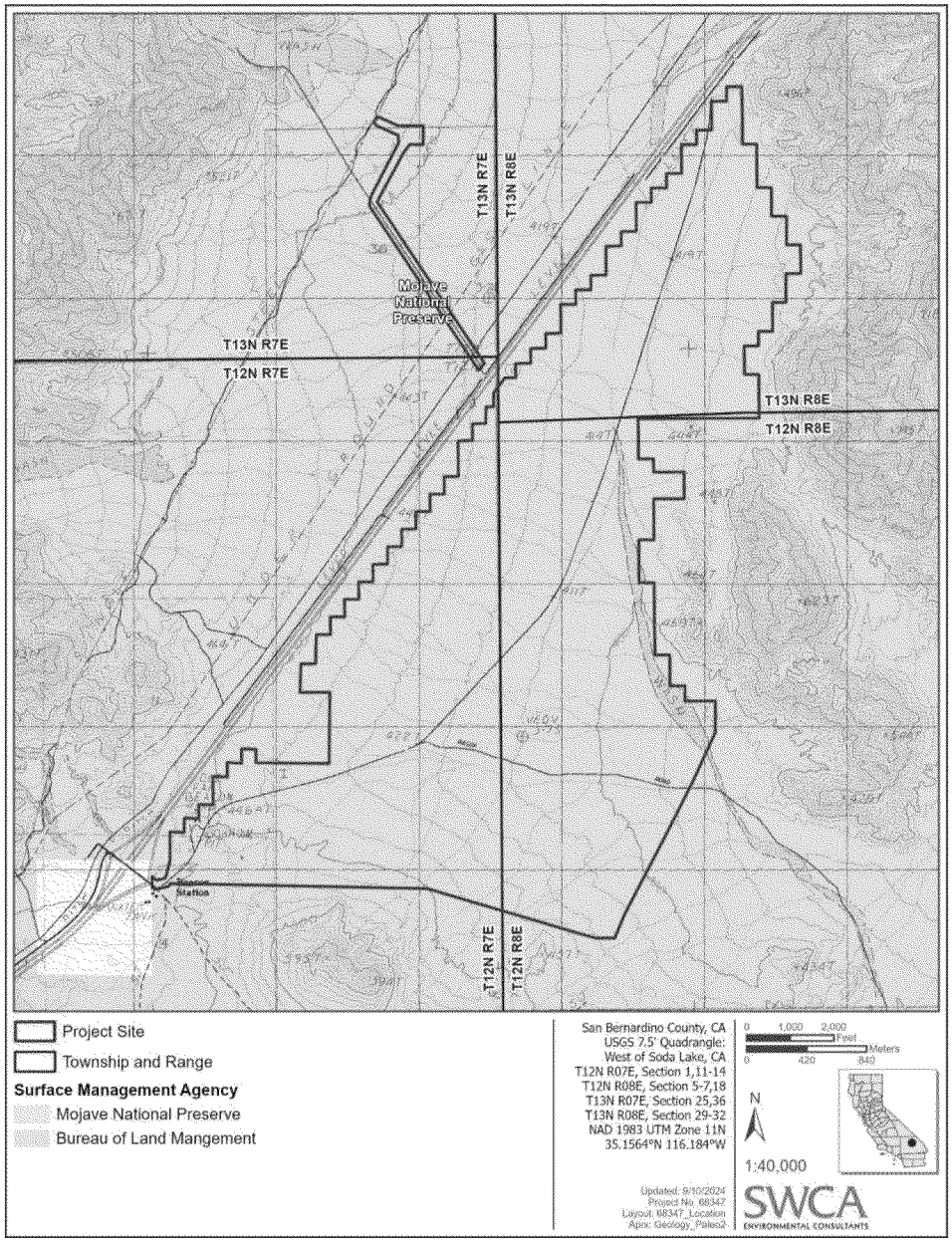


Figure 3.11-1. Project location and management agency.

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.

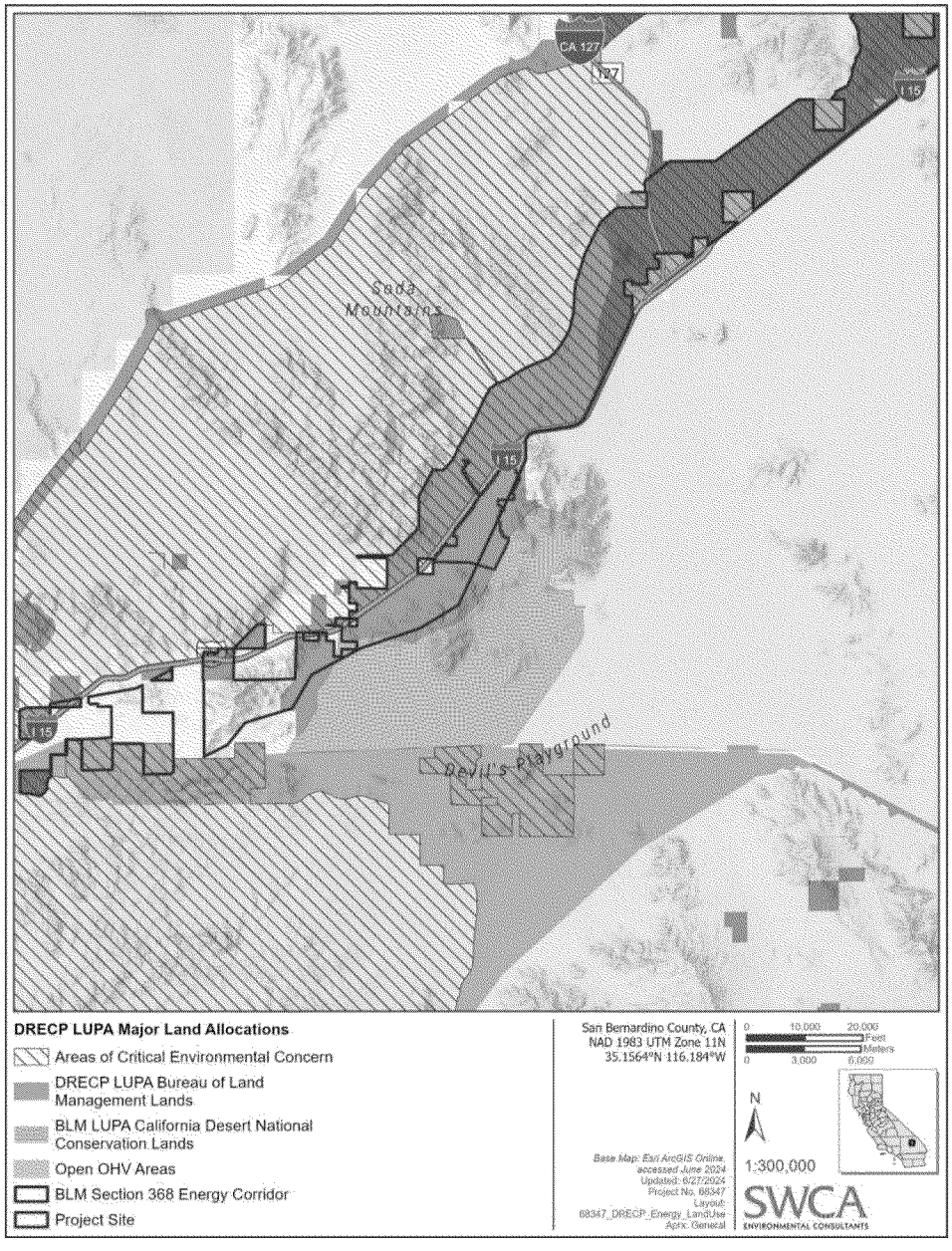


Figure 3.11-2. DRECP Land Use Allocations.

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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.

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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. References to project specific Applicant-Proposed Measures (APMs) and Mitigation Measures (MMs) are included in the tables where applicable.

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,	Consistent. A Biological Resources Technical Report has been prepared for the project (Appendix D). Multiple APMs and MMs apply to this CMA and those can be

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DRECP CMA	CMA Summary	Consistency Determination
	Joshua tree, microphyll woodlands, carbon sequestration characteristics, seeps, climate refugia) if present using the most current information, data sources, and tools (e.g., DRECP land cover mapping, aerial photos, DRECP species models, and reconnaissance site visits) to identify suitable habitat (see Glossary of Terms) for Focus and BLM Special Status Species. …	found in Section 3.4.4.3 and 3.4.5, respectively. **Consistent**. The Applicant would comply with this CMA.
LUPA-BIO-2	Designated biologist(s) (*see* Glossary of Terms), will conduct, and oversee where appropriate, activity-specific required biological monitoring during pre-construction, construction, and decommissioning to ensure that avoidance and minimization measures are appropriately implemented and are effective. The appropriate required monitoring will be determined during the environmental analysis and BLM approval process. The designated biologist(s) will submit monitoring reports directly to BLM.	**Consistent**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Multiple APMs and MMs apply to this CMA and those can be found in Section 3.4.4.3 and 3.4.5, respectively.**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. @Shirley – can you look into this one? **Consistent.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Resource setbacks have been applied per the relevant protocols used to assess potential adverse impacts to biological resources. The setbacks described in the Biological Resources Technical Report include minor incursions that do not individually or cumulatively compromise the conservation objectives of that resource or rise to a level of significance that warrants development and application of more rigorous CMAs or a DRECP LUPA amendment.Multiple APMs and MMs apply to this CMA and those can be found in Section 3.4.4.3 and 3.4.5, respectively.
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 following APMs and MMs address species-specific seasonal restrictions (Section 3.4.4.3 and 3.4.5): APM BIO-12 through 15, APM BIO-20, APM BIO-22 through 23, APM BIO-28 through 33, APM BIO-35, MM BIO-5 through 6, MM BIO-11, MM BIO-16, MM BIO-18, and MM BIO-21 through 24. **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 following APMs and MMs address a worker education program (Section 3.4.4.3 and 3.4.5): **Consistent**. The Applicant would comply with this CMA.APM BIO-12 and MM BIO-6.
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	**Consistent**. The project would implement the following measureAPM BIO-34 regarding the Raven Monitoring and Control Plan listed in Section 3.33.4.4.3, Biological Resources.:

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DRECP CMA	CMA Summary	Consistency Determination
	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. § …	~~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.~~
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 following APMs and MMs address vegetation removal (Section 3.4.4.3 and 3.4.5): APM BIO-1 through 9, APM BIO-13, APM BIO-20, MM BIO-3 though 4, MM BIO-6, MM BIO-18, MM BIO-21, MM BIO-28, and MM BIO-29.~~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 following APMs and MMs address vegetation removal (Section 3.4.4.3 and 3.4.5): APM BIO-1, APM BIO-8 through 9, AMP BIO-27, APM BIO-33 through 34, MM BIO-4 through 6, and MM BIO-29. ~~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 following APMs and MMs address preventative practices for water and wetland dependent resources (Section 3.4.4.3 and 3.4.5): APM BIO-19, MM BIO-1, MM BIO-4, MM BIO-23, MM BIO-26, and MM BIO-28. ~~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 following APMs and MMs address integrated weed management actions (Section 3.4.4.3 and 3.4.5): APM BIO-3 through 6, and MM BIO-28. ~~The Applicant would comply with this CMA.~~
LUPA-BIO-11	Implement the following CMAs for controlling nuisance animals and invasive species: …	**Consistent.** The following APMs and MMs address invasive species (Section 3.4.4.3 and 3.4.5): APM BIO-3, MM BIO-4, and MM BIO-28. ~~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.	**Consistent.** A Biological Resources Technical Report has been prepared for the project (Appendix D). See Section 3.4, Biological Resources. The following MMs address noise sources/controls (Section 3.4.5): MM BIO-11, MM BIO-17, MM BIO-20, and MM BIO-24. ~~The Applicant would comply with this CMA.~~

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DRECP CMA	CMA Summary	Consistency Determination
	§ 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.	
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**. See Section 3.4, Biological Resources. The Applicant has identified and committed to implementing many APMs and MMs as part of the proposed Project to avoid or substantially lessen potentially significant impacts to biological resources, to the extent feasible (Section 3.4.4.3 and 3.4.5). ~~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 following APMs and MMs address general standard practices for protecting focus and special-status species (Section 3.4.4.3 and 3.4.5): APM BIO-9, APM BIO-21, APM BIO-37, MM BIO-4 through 6, MM BIO-11, MM BIO-22, and MM BIO-28. ~~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**. While there is no specific APM or MM that addresses this CMA, Section2.4 addresses facility design which included the use of state-of-the-art construction and installation techniques. ~~The Applicant would comply with this CMA.~~
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 following APMs and MMs address measures specific to BLM sensitive birds (Section 3.4.4.3 and 3.4.5): APM Bio 13 through 18, APM BIO-20, APM BIO-22 through 25, APM BIO-37, and MM BIO-17 through 21. ~~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 following MM addresses the Avian Monitoring and Mitigation Program (Section 3.4.5): MM BIO-17. ~~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	**Not applicable**. Those vegetation types are not present in the project area.

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DRECP CMA	CMA Summary	Consistency Determination
	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").	
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 resource(s) for the activity-specific environmental analysis to determine: …	**Not applicable**. Sand dune vegetation types and Aeolian sand transport corridors are not present in the project area.
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.

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DRECP CMA	CMA Summary	Consistency Determination
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~~. A Biological Resources Technical Report has been prepared for the project (Appendix D).~~Consistent. The Applicant would comply with this CMA.~~ The following APMs and MMs address measures specific to protocol surveys (Section 3.4.4.3 and 3.4.5): APM BIO-10 through 11, APM BIO-13, APM BIO-15, APM BI-20 through 23, APM BIO-28 through 31, MM BIO-4 through 6, MM BIO-11, MM BIO-16 through 18, and MM BIO-21 through 22.
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)	~~Not~~ **Consistent**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Field surveys confirmed the presence of one special-status plant, Utah vine milkweed. APM BIO-10 and MM BIO-4 provides for a 100-foot buffer surrounding the occurrence area where no construction activities can take place. The 100-foot setback was determined to be sufficient by a qualified botanist to protect ecological processes necessary to support Utah vine milkweed. The setback reflects a minor incursions that will not individually or cumulatively compromise the conservation objectives of Utah vine milkweed to a level of significance that warrants development and application of more rigorous CMAs or a DRECP LUPA amendment.~~Because the APM would not provide the same setback, the Proposed Action would not meet the management goal of the DRECP for this CMA.~~ @Shirley: can you look into this?~~**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**. A Biological Resources Technical Report has been prepared for the project (Appendix D). The following APMs and MMs address measures specific to documented special status plant species (Section 3.4.4.3 and 3.4.5): APM BIO-10, and MM BIO-4 through 5. ~~**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	~~Consistent. The Applicant would comply with this CMA if the listed special vegetation features are found in the project area.~~Not applicable. A Biological Resources

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DRECP CMA	CMA Summary	Consistency Determination
	thorn stands. BLM guidelines for mapping/surveying cactus, yuccas, and succulents shall be followed.	Technical Report has been prepared for the project (Appendix D). No special vegetation features were recorded during field surveys conducted for the project.
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.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Yucca clones were not recorded during field surveys conducted for the project.~~**Consistent.** The Applicant would comply with this CMA if yucca clones 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.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Creosote bush rings were not recorded during field surveys conducted for the project.~~**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.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Saguaro cacti were not recorded during field surveys conducted for the project.~~**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).	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Joshua tree woodlands were not recorded during field surveys conducted for the project.~~**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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Microphyll woodlands were not recorded during field surveys conducted for the project.~~**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.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Crucifixion thorn stands were not recorded during field surveys conducted for the project.~~**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.	**Not applicable.** A Biological Resources Technical Report has been prepared for the project (Appendix D). No special vegetation features were recorded during field surveys conducted for the project.~~**Consistent.** The Applicant would comply with this CMA if cactus, yucca, and other succulents are found in the project area.~~

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DRECP CMA	CMA Summary	Consistency Determination
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 following APMs and MMs address measures specific to the collection of plant material (Section 3.4.4.3 and 3.4.5): APM BIO-2 and MM BIO-4. **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 following MM addresses measures specific to salvage and transplant of cactus, yucca, and other succulents (Section 3.4.5): MM BIO-4. **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**. Although APMs and MMs are included in Sections Section 3.4.4.3 and 3.4.5 for desert tortoise, ~~T~~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 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. …	**Not applicable**. Although APMs and MMs are included in Sections Section 3.4.4.3 and 3.4.5 for desert tortoise t~~T~~he project is not located in desert tortoise conservation 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 following APMs and MMs address measures specific to desert tortoise (Section 3.4.4.3 and 3.4.5): APM BIO-28 through 33, APM BIO-36, MM BIO-5, MM BIO-8, MM BIO-10 through 15, and MM BIO-28. ~~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-	**Not applicable**. Although APMs and MMs are included in Sections Section 3.4.4.3 and 3.4.5 for desert tortoise, ~~T~~the project is not located in desert tortoise survey areas outlined in Appendix D of the DRCEP.

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DRECP CMA	CMA Summary	Consistency Determination
	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. …	
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**. Although APMs and MMs are included in Sections Section 3.4.4.3 and 3.4.5 for desert tortoise, tThe 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**. Although APMs and MMs are included in Sections Section 3.4.4.3 and 3.4.5 for desert tortoise, tThe 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 following APMs and MMs address measures specific to a designated biologist being present during on-site activities (Section 3.4.4.3 and 3.4.5): APM BIO-33, MM BIO-5, MM BIO-11, MM BIO-13 and MM BIO-28. ~~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 following APMs and MMs address measures specific to desert tortoise and exclusion fencing (Section 3.4.4.3 and 3.4.5): APM BIO-28, APM BIO-32, MM BIO-8, MM BIO-11, MM BIO-13, and MM BIO-28. ~~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.~~**Consistent**. The following APMs and MMs address measures specific to wildlife and speed limits (Section 3.4.4.3 and 3.4.5): APM BIO-26 and MM BIO-10.
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.
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	**Consistent**. The following APMs and MMs address measures specific to burrowing owls monitoring (Section 3.4.4.3 and 3.4.5): APM BIO-14, MM BIO-5, MM BIO-9, MM

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DRECP CMA	CMA Summary	Consistency Determination
	(200 meter) setback to sufficiently minimize disturbance during the nesting period on all activity sites, when practical.	BIO-17, and MM BIO-21. 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 following APMs and MMs address measures specific to avoiding burrowing owl burrows (Section 3.4.4.3 and 3.4.5): APM BIO-22, APM BIO-35, MM BIO-5, and MM BIO-21. 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. **Not applicable**. No translocation of burrowing owls is currently being considered under the proposed action.
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.	**Not applicable**. The project is not within the range of the California Condor. **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.	**Not applicable**. The project is not within the range of the California Condor. **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.

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DRECP CMA	CMA Summary	Consistency Determination
LUPA-BIO-IFS-22	Operations and/or activities that reach an activity-specified trigger for condor injury and/or mortality as determined by BLM and USFWS, and CDFW as appropriate, will curtail operations and/or activities using best available techniques, as determined by BLM and USFWS, and CDFW as appropriate. (An example of a 2015 curtailment strategy is shutting down wind generation operations when condor(s) are present, or wind generation facilities switching to night operations only.) If curtailment techniques are not viable or available, then operations and/or activities will be suspended until the injury and/or condor mortality issue is resolved to the satisfaction of BLM and USFWS, and CDFW, as appropriate.	**Not applicable**. The project is not within the range of the California Condor.
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**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. ~~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**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. ~~**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	**Consistent**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within

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DRECP CMA	CMA Summary	Consistency Determination
	information as well as the data collected in the preproject golden eagle surveys.	the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. **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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. A permit for golden eagle take is expected for this project. **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.** A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. **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.** Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and

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DRECP CMA	CMA Summary	Consistency Determination
		MM BIO-18. **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**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. A permit for golden eagle take is expected for this project. **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**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. **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.	**Not applicable**. Swainson's hawk nests have not been documented in the project area. **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 following MMs address measures specific to bighorn sheep (Section 3.4.5): MM BIO-8, MM BIO-23, and MM BIO-26. **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 following MMs address measures specific to bighorn sheep (Section 3.4.5): MM BIO-8, MM BIO-23, and MM BIO-26. **Consistent**. The Applicant would comply with this CMA.
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	**Not applicable**. Mohave ground squirrel habitat is not present in the project area.

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DRECP CMA	CMA Summary	Consistency Determination
	Statement are required to assess the effect of the activity on the long term function of the affected key population center. …	
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 following MMs address measures specific to compensation ratios (Section 3.4.5): MM BIO-6, MM BIO-14, MM BIO-21, and MM BIO-27. **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 same "bird	**Consistent**. The following MM addresses measures specific to compensation for bird and bat Focus and special status species (Section 3.4.5): MM BIO-21. **Consistent**. The Applicant would comply with this CMA.

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DRECP CMA	CMA Summary	Consistency Determination
	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**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. A permit for golden eagle take is expected for this project. ~~**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**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18. A permit for golden eagle take is expected for this project. ~~**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.~~ Section 3.3, Air Quality covers the applicable national, state, and local requirements for air quality. The project construction-source and operational-source air pollutant emissions would not exceed applicable thresholds. However, the project would incorporate APMs AIR-1 through AIR-9 and MDAQMD (Rule 403.2) requirements to further reduce potential emissions.
LUPA-AIR-2:	Because project authorizations are a federal undertaking, air quality standards for fugitive dust may not exceed local standards and requirements.	**Consistent**. Section 3.3, Air Quality covers the applicable national, state, and local requirements for air quality. The project construction-source and operational-source air pollutant emissions would not exceed applicable thresholds. However, the project would incorporate APMs AIR-1 through AIR-9 and MDAQMD (Rule 403.2) requirements to further reduce potential emissions. ~~**Consistent**. The Applicant would comply with this CMA.~~

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DRECP CMA	CMA Summary	Consistency Determination
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**. Section 3.3, Air Quality covers the applicable national, state, and local requirements for air quality. The project construction-source and operational-source air pollutant emissions would not exceed applicable thresholds. However, the project would incorporate APMs AIR-1 through AIR-9 and MDAQMD (Rule 403.2) requirements to further reduce potential emissions. **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**. Section 3.3, Air Quality covers the applicable national, state, and local requirements for air quality. The project construction-source and operational-source air pollutant emissions would not exceed applicable thresholds. However, the project would incorporate APMs AIR-1 through AIR-9 and MDAQMD (Rule 403.2) requirements to further reduce potential emissions. **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. **Not applicable**. NEPA analysis has indicated that there will not be an impact on air quality from fugitive dust.
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. **Not applicable**. The project does not fall within an SRMA, ERMA, OHV Open Area, or Level 1-3 Recreation Facility.
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 project would utilize Rasor Road as the primary access road into the site, which also provides access to the Rasor OHV recreation area. The project would close Rasor Road during the approximately 18 months of project construction for site security, and for the duration of the project's anticipated 35-year operations. Public access to the Rasor OHV recreation area would be maintained from the Basin Road exit on I-15, as well as from the Rasor Road exit via existing primitive BLM motorized routes such as AC8825, reducing potential impacts to recreation facilities and maintaining off-road vehicles access. The project would implement APM REC-1 to communicate any access changes to the public. See Section 3.16, Recreation. **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.

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DRECP CMA	CMA Summary	Consistency Determination
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.
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 project would implement APM REC-1 listed in Section 3.16, Recreation. ~~**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~~APM REC-1 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. Applicable APMs include APM CUL-1 through 3.
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. Applicable APMs include APM CUL-1 through 3.
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**. On October 22, 2022, the CDFW sent letters to 35 individuals representing 29 tribal groups on the NAHC

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DRECP CMA	CMA Summary	Consistency Determination
		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.~~**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**. 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.~~**Consistent.** The Applicant would comply with this CMA.~~
LUPA-CUL-5	Develop interpretive material to correspond with recreational uses to educate the public about protecting cultural resources and avoiding disturbance of archaeological sites.	**Consistent**. The project would implement APM REC-1 listed in Section 3.16, Recreation. ~~**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. 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. Applicable APMs include APM CUL-1 through 3. ~~**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.~~

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DRECP CMA	CMA Summary	Consistency Determination
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**. 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. ~~**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**. 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. ~~**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**. 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. ~~**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 aApplicable**. 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 aApplicable**. 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 Ocotillo Wells SRMA (refer to the Ocotillo Wells SRMA Special Unit Management Plan in Appendix C).	**Not applicable**. The project area is not located in land use allocations where renewable energy and ancillary facilities are not allowed.
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.

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DRECP CMA	CMA Summary	Consistency Determination
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 project site was selected given the BLM's issuance of a ROD and associated amendment to the CDCA Plan in March 2016. The site is located within a designated federal Section 368 Energy Corridor adjacent to I-15 (Corridor number 27-225). Additionally, an existing SCE-owned 115-kV sub-transmission line and an LADWP-operated 500-kV transmission line run parallel to and adjacent to the western perimeter of the project site. ~~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.
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	**Not applicable**. The project area is not located within any grazing allotments. See

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DRECP CMA	CMA Summary	Consistency Determination
	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.	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.~~**Not applicable**. The project site is not located within a County-designated MRZ, and the BLM does not identify the project site as one with high mineral potential. The potential for mineral development in the future, after the use of the site for a solar project, will remain the same as under the existing setting, and the BLM could allow for future development of mining projects if a claim were requested. 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.

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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 centerline of 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 3.2~~1~~2, Paleontological Resources, APMS GEO-7 through 11..
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, APMS GEO-7 through 11..
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 3.2~~1~~2, Paleontological Resources, APMS GEO-7 through 11..
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 3.22, Paleontological Resources, APMS GEO-7 through 11.**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.

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DRECP CMA	CMA Summary	Consistency Determination
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 and APM.
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 and Section 3.11, Land Use Planning.
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 3.42, 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 requirements, such as buffer zones and setbacks, may be based, in part, on the results of the Water Supply Assessment defined below. In general, placement of long-term facilities within buffers or protected zones for soil and water resources is discouraged, but may be permitted if soil and water resource management objectives can be maintained.	**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.

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DRECP CMA	CMA Summary	Consistency Determination
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. 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.	**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-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.~~ **Not applicable**. The project is not located in the vicinity of playas or wild and scenic river corridors.
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. See Section 3.10 Hydrology and Water Quality.~~ **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	**Consistent**. The Applicant would comply with this CMA. See Section 3.10 Hydrology and Water Quality.

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DRECP CMA	CMA Summary	Consistency Determination
	mitigation and remediation measures, as specified in approved plans and permits.	
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.
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	**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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DRECP CMA	CMA Summary	Consistency Determination
	be detailed in the Groundwater Water Monitoring and Mitigation Plan.	
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.
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

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DRECP CMA	CMA Summary	Consistency Determination
		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 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 project site was selected given the BLM's issuance of a ROD and associated amendment to the CDCA Plan in March 2016. The site is located within a designated federal Section 368 Energy Corridor adjacent to I-15 (Corridor number 27-225). Additionally, an existing SCE-owned 115-kV sub-transmission line and an LADWP-operated 500-kV transmission line run parallel to and adjacent to the western perimeter of the project site. **Consistent**. The Applicant would comply with this CMA.

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DRECP CMA	CMA Summary	Consistency Determination
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.~~ See MM BIO-20 on the Bird and Bat Conservation Strategy in Section 3-4, Biological Resources.
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 project site was selected given the BLM's issuance of a ROD and associated amendment to the CDCA Plan in March 2016. The site is located within a designated federal Section 368 Energy Corridor adjacent to I-15 (Corridor number 27-225). Additionally, an existing SCE-owned 115-kV sub-transmission line and an LADWP-operated 500-kV transmission line run parallel to and adjacent to the western perimeter of the project site. ~~**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 project site was selected given the BLM's issuance of a ROD and associated amendment to the CDCA Plan in March 2016. The site is located within a designated federal Section 368 Energy Corridor adjacent to I-15 (Corridor number 27-225). Additionally, an existing SCE-owned 115-kV sub-transmission line and an LADWP-operated 500-kV transmission line run parallel to and adjacent to the western perimeter of the project site. ~~**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 regional impacts of the project. Refer to the NHPA Programmatic Agreement for details regarding the mitigation fee.	**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 cumulative or indirect adverse effects to historic properties See Section 3.5, Cultural Resources.
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. See Section 3.5, Cultural Resources.
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. See Section 3.5, Cultural Resources.

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DRECP CMA	CMA Summary	Consistency Determination
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. See Section 3.5, Cultural Resources.
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. See Section 3.5, Cultural Resources.
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 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.**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.
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**. Implementation of APM BIO-10, APM BIO-11, and APM BIO-12 as part of the project would avoid or substantially lessen potentially significant impacts to special-status plants, to the extent feasible.The Applicant would comply with this CMA.

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DRECP CMA	CMA Summary	Consistency Determination
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. See Section 3.4, Biological Resources.
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. See Section 3.4, Biological Resources.~~**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**. A Biological Resources Technical Report has been prepared for the project (Appendix D). Based on the report, suitable nesting habitat is not present within the study area although suitable foraging habitat is present. According to the California Natural Diversity Database, the nearest record is approximately 8 miles southwest of the study area, which documented a nesting pair in 2011. There is low potential for golden eagle to forage in the study area. However, the following APMs and MMs address measures specific to active golden eagle nests (Section 3.4.4.3 and 3.4.5): APM BIO-13 through 14, APM BIO-23, and MM BIO-18.~~**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.

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DRECP CMA	CMA Summary	Consistency Determination
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.
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. See Section 3.16, Recreation and Section 3.11, Land Use and Planning.~~**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.~~**Not applicable**. The project is not located in a SRMA or ERMA.
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. See Section 3.16, Recreation. ~~**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 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.~~**Consistent**. The Applicant would comply with this CMA.~~

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DRECP CMA	CMA Summary	Consistency Determination
ACEC-CUL-2	Update records for existing cultural resources within ACECs, prioritizing ACECs where the relevant and important criteria include cultural resources.	**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.~~**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 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.~~**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 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.~~**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 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.~~**Consistent**. The Applicant would comply with this CMA.~~

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DRECP CMA	CMA Summary	Consistency Determination
ACEC-CUL-6	Where specific threats are identified, implement protection measures consistent with agency NHPA Section 106 responsibilities	**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. ~~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 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 project 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	**Consistent**. The project would not have a measurable adverse impact on the biological or cultural conservation strategies

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DRECP CMA	CMA Summary	Consistency Determination
	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.	~~of the DRECP LUPA. The Applicant would comply with this CMA.~~ See Sections 3.4 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.~~**Consistent**. The project would not have a measurable adverse impact to the recreation design of the DRECP LUPA. 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 not have a measurable adverse impact on the renewable energy and transmission design of the DRECP LUPA. ~~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. The infrastructure 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. See Section 2.3.1.1.
GPL-5	DRECP LUPA – Activities that may have a measurable (i.e. the effect can be evaluated) adverse impact (direct, indirect, or cumulative) on the LUPA-wide structure, and implementation of the DRECP LUPA are not allowed.	**Consistent**. The project would not have a measurable adverse impact on the implementation of the DRECP LUPA.
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 project would utilize Rasor Road as the primary access road into the site, which also provides access to the Rasor OHV recreation area. The project would close Rasor Road during the approximately 18 months of project construction for site security, and for the duration of the project's anticipated 35-year operations. Public access to the Rasor OHV recreation area would be maintained from the Basin Road exit on I-15, as well as from the Rasor Road exit via existing primitive BLM motorized routes such as AC8825, reducing potential impacts to recreation facilities and maintaining off-road vehicles access. The project would implement APM REC-1 to communicate any access changes to the public. See Section 3.16, Recreation.~~**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 project would utilize Rasor Road as the primary access road into the site, which also provides access to the Rasor OHV recreation area. The project would close Rasor Road during the approximately 18 months of project construction for site security, and for the duration of the project's anticipated 35-year operations. Public access to the Rasor OHV recreation area would be maintained from the Basin Road exit on I-15, as well as from the Rasor Road exit via existing

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DRECP CMA	CMA Summary	Consistency Determination
		primitive BLM motorized routes such as AC8825, reducing potential impacts to recreation facilities and maintaining off-road vehicles access. The project would implement APM REC-1 to communicate any access changes to the public. See Section 3.16, Recreation.**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. 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. ~~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	**Consistent**. The project area has already been surveyed for cultural resources and no resources eligible for the NRHP or CRHR or unique archaeological resources

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DRECP CMA	CMA Summary	Consistency Determination
	geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints.	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-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 following APMs and address impacts to visual and aesthetic resources (Section 3.1.3.2): APM AES-1 through 5.~~**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	**Not applicable**. The project is not within 0.5 miles of a Level 3 Recreation Facility.

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DRECP CMA	CMA Summary	Consistency Determination
	relocated to the same or 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.~~**Not applicable.** The project would not impact existing, approved recreation activities. 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.	**Not applicable.** The project would not impact dispersed recreation activities. See Section 3.16, Recreation. ~~**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.~~ 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).~~**Consistent.** The Applicant~~

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DRECP CMA	CMA Summary	Consistency Determination
		would comply with this CMA. See Section 3.16, Recreation.
GPL-VRM-21	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**. 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).**Consistent.** The Applicant would comply with this CMA. See Section 3.16, Recreation.
GPL-VRM-34	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**. 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).**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.*		
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	**Consistent**. On October 22, 2022, the CDFW sent letters to 35 individuals representing 29 tribal

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WWEC ROD IOP	Consistency Determination
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).	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.**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. See Section 3.4, Biological Resources and Appendix D, Biological Resources Technical Report.
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 planning process in order to identify appropriate aircraft safety requirements.	**Not applicable**. The project is not an electrical transmission project.
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. See Section 3.11.
Recommended Revision from the 2022 Section 368 Energy Corridor Review Final Report (BLM and USFS 2022): In the existing IOP for agency coordination, consider adding text recommending height restrictions for new infrastructure within corridors near DoD training routes. Rationale: The existing IOP for agency coordination requires applicants to inform and coordinate with DoD regarding characteristics and locations of anticipated project infrastructure within corridors located on DoD-	**Recommended but not required**: The project is not located on DOD-administered lands but there are three military installations located within a 25-mile radius of the project site. According to BLM and USFS (2022), this revised IOP could be adopted as a BMP at the BLM's discretion if deemed appropriate; however, adoption is not required unless the WWEC ROD is amended.

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WWEC ROD IOP	Consistency Determination
administered lands or near DoD facilities or flight training areas. The IOP could be expanded to include specific height restrictions for new infrastructure in those locations.	
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 for energy project siting, construction, and operation. See Section 2..
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.
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	**Consistent**. The Applicant is coordinating with agency POCs and has prepared a cumulative impacts analysis in each environmental impact section.

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should be conducted and any pertinent information be considered during project planning.	
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. See Section 3.11.
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), 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.	Not applicable. The project is located near any designated wild or scenic rivers. ~~Consistent. An Aquatic Resources Delineation Report has been prepared for the project (Appendix E-1). See Section 3.2, Biological Resources.~~

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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.	Not applicable. The project is located near any designated wild or scenic rivers. ~~**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.~~Not applicable. ~~An Aquatic Resources Delineation Report has been prepared for the project (Appendix E-1). See Section 3.2, Biological Resources.~~There are no streams in the vicinity of the project area that have streams listed as impaired under Section 303(d) of the Clean Water Act (See: 2024 Integrated Report for the California Water Board)
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 and APMs GEO7 through 11. .
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 and APMs GEO7 through 11..
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 and APMs GEO7 through 11..
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. A Biological Resources Technical Report has been prepared for the project (Appendix D). Multiple APMs and MMs apply to this CMA and those can be found in Section 3.4.4.3 and 3.4.5, respectively. ~~**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. A Biological Resources Technical Report has been prepared for the project (Appendix D). Multiple APMs and MMs apply to this CMA and those can be found in Section 3.4.4.3 and 3.4.5, respectively. ~~**Consistent.** An Biological Resources Technical Report has been prepared for the project (Appendix D). See Section 3.2, Biological Resources.~~

WWEC ROD IOP	Consistency Determination
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, and other aquatic habitats in the project area and design the project to avoid or mitigate impacts to these habitats.	**Consistent**. An Aquatic Resources Delineation Biological Resources Technical Report has been prepared for the project (Appendix E-1D). See Section 3.24, Biological Resources.
Recommended Addition from the 2022 Section 368 Energy Corridor Review Final Report (BLM and USFS 2022): Consider adding subsections for habitat connectivity, migration corridors, sage-grouse habitat, and avian collision. Rationale: The existing IOPs for ecological resources focus on sensitive species, habitat restoration, and wetlands and other aquatic habitats. There is a need to address habitat connectivity, migration corridors, and avian collision, which are specific concerns for linear infrastructure that spans long distances. An IOP for sage-grouse would provide consistent management for sage-grouse by the BLM and USFS.	**Recommended but not required**: A Biological Resources Technical Report has been prepared for the project (Appendix D). See Section 3.4, Biological Resources which includes information on avian use, migration pathways, and habitat connectivity. According to BLM and USFS (2022), this revised IOP could be adopted as a BMP at the BLM's discretion if deemed appropriate; however, adoption is not required unless the WWEC ROD is amended.
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 3.24, Biological Resources, and more specifically, APM BIO-6 and MM BIO-28.
Recommended Revision from the 2022 Section 368 Energy Corridor Review Final Report (BLM and USFS 2022): In the existing IOP for vegetation management, consider addressing additional active ingredients in pesticides in the Section 368 energy corridors on BLM-managed lands. Rationale: The existing IOP for vegetation management requires an integrated management plan and includes a subsection on pesticide use. The IOP could be expanded to address newly registered uses of three additional active ingredients in pesticides in Section 368 energy corridors on BLM-managed lands.	**Recommended but not required**: As new pesticide active ingredients are approved for use under NEPA, the BLM may select the most appropriate ingredient(s) for a given project. According to BLM and USFS (2022), this revised IOP could be adopted as a BMP at the BLM's discretion; however, adoption is not required unless the WWEC ROD is amended.
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	**Consistent**. An Archaeological Resources Assessment has been prepared for the project (Appendix F). Additionally, a Historical Resources Assessment has been prepared for the project

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WWEC ROD IOP	Consistency Determination
be paid for through project cost-recovery funds. The agencies, through the POC, remain responsible for consultation.	(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 (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.	**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.
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

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	(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 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).	~~**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. Additionally, 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.~~**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.~~
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.~~ Additionally, 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.

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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.
Recommended Addition from the 2022 Section 368 Energy Corridor Review Final Report (BLM and USFS 2022): In addition to existing IOPs on government-to-government consultation, cultural resources, and Tribal traditional cultural uses, consider adding an IOP on working with Tribes to conduct ethnographic studies Rationale: The existing IOP for Tribal concerns focuses on government-to-government consultation, cultural resources, and traditional cultural uses, including 1) identifying sacred sites, sacred landscapes, gathering grounds, and burial areas and 2) avoiding minimizing, or mitigating impacts on those places in consultation with Tribes, project proponents, and other relevant parties. An additional IOP on working with the Tribes to conduct ethnographic studies would increase the BLM's and USFS's understanding of significant resources of concern to Tribes.	Not applicable. Tribal consultation did not indicate the need for an ethnographic study. According to BLM and USFS (2022), this revised IOP could be adopted as a BMP if the Tribes request an ethnography; however, adoption is not required unless the WWEC ROD is amended.
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**. A~~n~~ 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 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	**Consistent**. A~~n~~ Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.

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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**. A~~n~~ 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**. A~~n~~ 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**. A~~n~~ 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**. A~~n~~ Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics.
Recommended Revision from the 2022 Section 368 Energy Corridor Review Final Report (BLM and USFS 2022): In the existing IOP for visual resources, consider adding a subsection regarding visual impact analysis. Rationale: The existing IOP for visual resources requires project proponents to identify and consider and prepare a plan for visual resource management (VRM) and scenery management (SMS), mitigate visual impacts and consider BMPs, and comply with VRM and SMS objectives. The IOP could be expanded to consider cumulative effects associated with energy development within Section 368 energy corridors and conformance with land use plans.	**Recommended but not required**: A Visual Resources Report has been prepared for the project (Appendix B). See Section 3.1, Aesthetics which includes a section on cumulative impacts. According to BLM and USFS (2022), this revised IOP could be adopted as a BMP at the BLM's discretion; however, adoption is not required unless the WWEC ROD is amended.
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. Relevant APMs include: APM FIRE-1, AMP HAZ-1, and APM HAZ-3, APM BIO-1, APM BIO-2, APM BIO-7, APM BIO-9. ~~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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WWEC ROD IOP	Consistency Determination
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. Relevant APMs include: APM FIRE-1, AMP HAZ-1, and APM HAZ-3, APM BIO-1, APM BIO-2, APM BIO-7, APM BIO-9.
Lands with Wilderness Characteristics and Values	
Recommended Addition from the 2022 Section 368 Energy Corridor Review Final Report (BLM and USFS 2022): Consider adding an IOP for lands with wilderness characteristics on BLM-managed lands and lands with wilderness character on USFS-managed lands. Rationale: There is no IOP for lands with wilderness characteristics or wilderness character. An IOP on this topic could provide consistent management of these federal lands by the BLM and USFS.	**Not Applicable:** The project is not located in an area managed for wilderness characteristics.
National Scenic Trails and National Historic Trails	
Recommended Addition from the 2022 Section 368 Energy Corridor Review Final Report (BLM and USFS 2022): Consider adding a subsection for NSTs and NHTs. Rationale: There is no IOP for NSTs and NHTs. NSTs, NHTs, and Section 368 energy corridors are long, linear features that cross multiple jurisdictions. An IOP could provide guidance across agencies and jurisdictions where Section 368 energy corridors cross NSTs and NHTs.	**Not Applicable:** The project does not cross any designated National Scenic or Historic Trail.

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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

SMSP01717

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

San Bernardino County. 2007. General Plan Land Use Zoning Districts, page CIDI A Owlshead Mtns/Soda Mtns. Available at: https://www.sbcounty.gov/uploads/lus/GeneralPlan/CIDIA.pdf. Accessed April 2, 2024.

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Bureau of Land Management (BLM). 1999. *The California Desert Conservation Area Plan 1980, as amended*. Available at https://eplanning.blm.gov/public_projects/lup/66949/82080/96344/CDCA_Plan.pdf. Accessed Julyne 20254.

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———. 2016a. *Record of Decision: Soda Mountain Solar Project and Amendment to the California Desert Conservation Area Plan*. Available at: https://eplanning.blm.gov/eplanning-ui/project/66043/510. Accessed ~~January 2024~~July 2025.

———. 2016b. *Desert Renewable Energy Conservation Plan, Land Use Plan Amendment to the California Desert Conservation Area Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan*. Available at: https://eplanning.blm.gov/public_projects/lup/66459/133474/163144/DRECP_BLM_LUPA.pdf. Accessed July 2025~~anuary 2024~~.

———. 2024. West-wide Energy Corridors. Available at: https://www.blm.gov/energy-corridors. Accessed July 2025.~~,~~

Bureau of Land Management (BLM) and U.S. Forest Service (USFS). 2022. Energy Policy Act of 2005 Section 368 Energy Corridor Review Final Report: Regions 1 – 6. Available at: https://www.blm.gov/sites/blm.gov/files/docs/2022-04/Section%20368%20Energy%20Corridor%20Final%20Report_April_2022.pdf . Accessed July 2025.

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 7/31/2025 10:26:33 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Soda Mountain Solar Project- Request for Information

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Hi Lisa,

We acknowledge and agree to these requests.

Thank you!
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, July 31, 2025 3:25:17 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Soda Mountain Solar Project- Request for Information

Hi Hannah,

The CEC is requesting the following information. Note that Staff's ability to meet the projected timelines is contingent upon the applicant's timely responses. We ask that you acknowledge and agree to the response timeframes outlined below.

DR REV 2 DR BIO-1

- The applicant will commit to field verification of the revised jurisdictional drainage data for the solar arrays submitted to the docket (TN 265144) on July 30, 2025. At a minimum, the field verification should include two transects west of Arrowhead Trail, one transect east of Arrowhead Trail, and one transect south of Razor Road. The transects should be oriented relatively perpendicular to general flow patterns and should extend within the entirety of the project boundary along each transect.
- The applicant will commit to submitting an updated Jurisdictional Delineation Report that reflects a comprehensive, complete, and most recent account of drainage features occurring within the solar arrays.
- The field verifications and reports shall be completed and submitted no more than 3 weeks upon the determination that the project is data complete.

DR REV 2 DR BIO-2

- The applicant will commit to conducting a field verification along the entire proposed access road route to the gen-tie alignment. This includes the portions of CL8854 and CL7682 that have been proposed and confirmed by the applicant as the only access route that will be utilized to access the gen-tie alignment. Staff has received the initial desktop review delineation report for the access roads (TN 265169); however, does not believe that a field

verification is too onerous or infeasible. The field verification shall include the entire proposed and confirmed access route plus a 50-foot buffer.

- The applicant will commit to submitting an updated Jurisdictional Delineation Report that reflects a comprehensive, complete, and most recent account of drainage features occurring along the access road route.
- The field verification and reports shall be completed and submitted no more than 3 weeks upon the determination that the project is data complete.
- The applicant will conduct surveys for sensitive biological resources, including rare plants, burrowing owl, desert tortoise, desert kit fox, among other special-status species, along the proposed and confirmed access road route. The surveys shall included the entire route and a 50-foot buffer. The survey data shall be submitted to the CEC no more than 3 weeks upon the determination that the project is data complete.
- Additionally, the applicant will provide the specific BLM road-classifications and representative photos for CL8854 and CL7682 within 1 week of determination that the project is data complete.

Please file your responses to the docket. If you have any questions about these items, please let us know.

Thanks kindly,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 8/11/2025 10:49:10 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Larson, William@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7d9e60624bc84728ab89022ad74408dc-aff4008d-d8]; Roger Hatheway [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=320e3daadd884f89bba45f499c3e8612-f57fd1cf-d6]; Lauren DeOliveira [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59b95046bca34d92ac4e6f09cfc85b02-e4a00264-59]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Soda Mountain- Request for archeology surveys for new access road

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Hi Lisa,

Thank you for this information. We will get this completed ASAP!

- Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Monday, August 11, 2025 1:58 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Larson, William@Energy <William.Larson@Energy.ca.gov>; Roger Hatheway <rhatheway@aspeneg.com>; Lauren DeOliveira <ldeoliveira@aspeneg.com>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Soda Mountain- Request for archeology surveys for new access road

Hi Hannah,

The Cultural/Tribal Cultural staff need the new access road to be surveyed for archaeology with the 50-ft required buffer for linears. Please use the same survey methods you have used for other surveys with approximately 20 foot intervals.

A record search is not necessary.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 8/22/2025 6:12:35 PM
To: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
CC: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Re: Site Visit Request for Soda Mountain Solar Project (8/29)

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Hi Kaycee,

Apologies for the delay in response to this email. Yes, if the CEC prefers to perform a site visit without the Applicant team that is fine. Given the remote nature of the site, the extreme heat and significant site hazards such as rattlesnake season and required vehicle off-roading, would it be possible to receive a Safety Plan from your team?

Regarding a suggested route, for project components to the south of the I-15, the only drivable roads on the project site are Arrowhead Road and Rasor Road. We would strongly suggest that all CEC vehicles stay on these roadways and then staff hike into any areas of potential interest. Given the condition of the site, there is a high-risk vehicles will get stuck if they leave these two roadways. Arrowhead Road is also only accessible from the Rasor Road exit (not Zzyxx exit). For portions of the project site that are located to the north of the I-15, there is a well-traveled access road accessible from the Zzyxx road exit.

To help with the site visit - I am preparing a KMZ of the site plan that overlays a google earth map. This will allow your staff to track their location on the site in real time, while locating the specific components of the project they are interested in viewing (BESS, arrays, Switchyard, Substation, gen-tie, etc.). I will send this data layer along shortly and it should be able to be utilized via cell phones or tablets with the google earth app while in the field.

Lastly, the CEO of VC Renewables is flying out for the NOP Scoping meeting and the VCR team needed to perform a site visit that morning anyways. So, there is a possibility you may also see us in the field. However, we will conduct our tour separately than yours, per your email request.

Thank you!
Hannah

Hannah Arkin

CEO

Resolution Environmental

262 B Avenue, Coronado, CA 92118

760-504-4109

From: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Sent: Monday, August 18, 2025 3:16 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Re: Site Visit Request for Soda Mountain Solar Project (8/29)

Hi Hannah,

Respectfully, if we wanted to conduct the site visit ourselves on 8/29, would that be possible? Is there a specific site map/route you suggest?
We are working on our travel arrangements and think this would allow us to be a bit more flexible with our timing.

Many thanks,
Kaycee

Kaycee Chang (she, her, hers)
Supervisor
Siting, Transmission, and Environmental Protection Division
Book time to meet with me

From: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Sent: Monday, August 11, 2025 11:52 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Jackson-Ross, Lyndsay@Energy <Lyndsay.Jackson-Ross@Energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>; Rodriguez, Sally@Energy <Sally.Rodriguez@energy.ca.gov>; Lukanich, Kimberly@Energy <Kimberly.Lukanich@Energy.ca.gov>; House, Rosemary@Energy <Rosemary.House@Energy.ca.gov>; Sandoval-Moreno, Victoria@Energy <Victoria.Sandoval-Moreno@energy.ca.gov>
Subject: Re: Site Visit Request for Soda Mountain Solar Project (8/29)

Hello Hannah,

We'd like to have the site visit on 8/29, from 9am-11am, please. We will meet you at the location you provided and will look forward to the site map.

Potential attendees from our side include:

- Commissioner Gallardo
- Jimmy Qaqundah, her advisor
- Chair Hochschild
- Robert Chun, his advisor
- Drew Bohan, our Executive Director
- Dian Vorters, Siting deputy director
- Eric Knight, Siting and Environmental branch manager
- Kaycee Chang (myself, CEQA project management supervisor)
- Bio staff TBD

I will also confirm the attendee list closer to the date.
I included the Chair and Robert's scheduler in this email as well, along with Kimberly and Sally to support Drew's calendar/travel.

We are still waiting to confirm the 3pm meeting venue, but it is likely Holiday Inn Express (2709 Lenwood Road, Barstow, CA 92311). If we can all stay there, our days would likely look like this:
Thursday, 8/28

- Everyone arrives to Barstow, CA - stays at Holiday Inn Express or nearby

Friday 8/29

- Leave hotel in Barstow, drive to Baker
- 9am: meet Hannah Arkin and team at 66150 Rasor Road, Baker CA 92309 (Shell Gas Station parking lot)
- 11am: conclude site visit
- Drive back to hotel in Barstow, lunch, freshen up, etc.
- 1pm: arrive to the conference room ~2 hrs early to finish set up and get situated
- 3pm-7pm: hybrid info/scoping meeting

Information from Hannah Arkin:

1. **Site Visit Time**: 9am-11am
2. **Location**: Meet at 66150 Rasor Road, Baker CA 92309. This is the Shell Gas Station parking lot, which is the closest public location to the project site. Hannah will provide a site map as we get closer to the date, identifying the tour route.
3. **Contact:** Hannah Arkin, 760-504-4109, hannah@resolutionenvironmental.com

Thank you very much, everyone!
Kaycee

Kaycee Chang (she, her, hers)
Supervisor
Siting, Transmission, and Environmental Protection Division
Book time to meet with me

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Wednesday, July 30, 2025 1:06 PM
To: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Cc: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; House, Rosemary@Energy <Rosemary.House@Energy.ca.gov>; Sandoval-Moreno, Victoria@Energy <Victoria.Sandoval-Moreno@energy.ca.gov>
Subject: Re: Site Visit Request for Soda Mountain Solar Project (8/28 or 8/29)

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Hi Kaycee,

Thank you for your email. We would be delighted to host a site visit on 8/28 or 8/29.

If we host the visit before the scoping meeting on 8/29, I would suggest the following:

1. **Time**: 9am-11am

2. **Location**: Meet at 66150 Rasor Road, Baker CA 92309. This is the Shell Gas Station parking lot, which is the closest public location to our project site. Alternatively, I am happy to arrange carpools from any Barstow hotel to the project site. I will provide a site map as we get closer to the date, identifying the tour route.
3. **Contact:** Hannah Arkin, 760-504-4109, hannah@resolutionenvironmental.com

Given the remote nature of the site and associated travel times, your team may want to consider having the site tour on 8/28. We are able to make either day work. Please just let us know what works best for your side.

Thank you!
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Sent: Tuesday, July 29, 2025 6:02 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; House, Rosemary@Energy <Rosemary.House@Energy.ca.gov>; Sandoval-Moreno, Victoria@Energy <Victoria.Sandoval-Moreno@energy.ca.gov>
Subject: Site Visit Request for Soda Mountain Solar Project (8/28 or 8/29)

Hi Hannah,

Hope you're doing well! We appreciate your efforts getting us all the information quickly as we are working towards deeming Soda Mountain complete on 7/31. Lisa shared yesterday that the only date that works on our side for the hybrid informational/scoping meeting is 8/29/25, from 3-7pm to balance between business and non-business hours (with the understanding that the event may end early depending on number of attendees).

I believe you and Lisa have discussed this, but we wanted to put the ask in an email and loop in the Chair and Commissioner's schedulers/travel coordinators: In addition to the meeting, **can we request a site visit before the meeting, either the afternoon of 8/28 or the morning of 8/29?**

Commissioner Gallardo and our Executive Director, Drew Bohan, would be in attendance, along with potentially staff from our Siting Division. Rosemary House is in charge of Commissioner Gallardo's calendar and Victoria Sandoval-Moreno is in charge of Drew's.

If the morning of 8/29 works best, we would probably want to get back to the venue 2-3 hours before the meeting, so around 12-1pm.

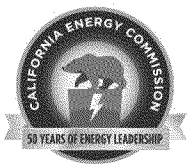
At minimum, the following information would be helpful for the site visit:

1. Time
2. Location - specific information on where to meet, and maybe a map, would be helpful
3. Contact name, email, and phone number for day of coordination and for emergencies

Thank you very much!
Kaycee

Kaycee Chang (she, her, hers)
Supervisor
CEQA Project Management
Siting and Environmental Branch
Siting, Transmission, and Environmental Protection Division
Work: 1-916-232-6319
Cell: 1-916-208-6545

California Energy Commission
Website: www.energy.ca.gov





Book time to meet with me

From: Tatiana Inouye [TInouye@aspeneg.com]
Sent: 7/25/2025 3:35:01 PM
To: Negar Vahidi [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=cb23cc0e70ac4e44ab61714491954981-4e241c75-c7]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Patrovsky, Joan E [jpatrovs@blm.gov]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: RE: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap

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The following days/times work for me as well:

- Friday 25th : 12-2, 4-5
- Monday 28th : 11-12:30
- Tuesday 29th : 2:30-3, 4-5

Thank you,

Tatiana Inouye
Senior Environmental Planner
Land Use & Public Policy
Aspen Environmental Group
Office: 818-338-6762
Cell: 805-630-0972

Learn more about our Planning & Public Policy services.

From: Negar Vahidi <NVahidi@aspeneg.com>
Sent: Friday, July 25, 2025 8:00 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Patrovsky, Joan E <jpatrovs@blm.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Tatiana Inouye <TInouye@aspeneg.com>
Subject: RE: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap

Hi Lisa,

During the time slots provided, I'm available for a meeting as follows:

- Friday 25th : 12-2, 4-5
- Monday 28th : 11-12:30
- Tuesday 29th : 2:30-3, 4-5

Thank you,

Negar Vahidi
Executive Vice President
Planning & Public Policy Director
Aspen Environmental Group
(310) 387-6807 cell

Learn more about our Planning & Public Policy services.

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, July 24, 2025 5:47 PM
To: Patrovsky, Joan E <jpatrovs@blm.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Tatiana Inouye <TInouye@aspeneg.com>; Negar Vahidi <NVahidi@aspeneg.com>
Subject: Re: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap

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Thanks Joan for your email. Kaycee and I are available on the following days and times:
Friday 25th 12-2, 4-5
Monday 28th 8-9, 11-12:30
Tuesday 29th 9-11:30, 2:30-3, 4-5

Tatiana, Negar and Joan, please let me know all the days and times you can meet.

Thanks,

Lisa Worrall

Senior Environmental Planner

CEQA Project Management Unit

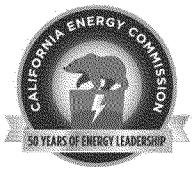
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814

1-916-661-8367

California Energy Commission

Website: www.energy.ca.gov



From: Patrovsky, Joan E <jpatrovs@blm.gov>
Sent: Thursday, July 24, 2025 5:19 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Tatiana Inouye <tinouye@aspeneg.com>; Negar Vahidi <nvahidi@aspeneg.com>
Subject: Re: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap

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Hello Lisa,

The Bureau of Land Management (BLM) has determined that an Environmental Assessment (EA) is necessary to comply with NEPA regulations. However, the project holder is in disagreement on our determination.

Our renewable energy coordinator has scheduled a hybrid meeting with the Soda Mountain applicant and their representatives, along with the BLM State Office, on August 12. The purpose of this meeting is to discuss their concerns regarding the level of NEPA review and any other related issues.

To date, proposed changes to the Soda Mountain Solar project have not been submitted in a revised Plan of Development; the last version we have is dated March 2025. It is important that all proposed changes be evaluated together rather than individually.

Could you please provide some potential dates and times for a call?

Attendees from our side would include Barstow Field Manager Marc Stamer (mstamer@blm.gov), BLM Realty Specialist Isabeau Cordes (icordes@blm.gov), and myself. Our renewable energy coordinator, Nancy Robledo (lrobledo@blm.gov), might attend to share updates on ongoing directive changes for BLM solar projects.

Also, please note that Zoey (Caroline) Kaufman has left BLM for private endeavors.

Thank you, and I look forward to coordinating with you.

Best regards,
Joan Patrovsky, PMP
Project Manager
U.S. Department of the Interior - Region 8 and 10
Bureau of Land Management
California Desert District Office

"What you do today can improve all your tomorrows."- Ralph Marston

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From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, July 24, 2025 12:54 PM
To: Patrovsky, Joan E <jpatrovs@blm.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Tatiana Inouye <tinouye@aspeneg.com>; Negar Vahidi <nvahidi@aspeneg.com>
Subject: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap

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Hi Joan,

I would like to meet with you and other BLM staff as necessary to discuss some land use questions our staff has.

The applicant states that the current project would be consistent with the project that was approved by the BLM in a 2016 Record of Decision. Is that correct?

We understand that BLM has proposed an amendment to the West-Wide Energy Corridor that includes adjustments to energy corridor designations and revisions to IOPs. Would the BLM incorporate the proposed IOP revisions, where applicable, into the permit conditions for the proposed project's ROW grant authorization?

We are working to deem the Opt-In application complete next week and would like to discuss these questions and possibly other associated questions this week.

Please let me know your availability so I can send an invite to you.

Thanks kindly,

Lisa Worrall

Senior Environmental Planner

CEQA Project Management Unit

Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814

1-916-661-8367

California Energy Commission

Website: www.energy.ca.gov



From: Neal Desai [ndesai@npca.org]
Sent: 8/7/2025 9:34:47 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: RE: Request to talk re: Soda Mountain Solar opt-in

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Hi Lisa and Kaycee,
We saw that the project application was deemed complete and the clock has started ticking for this rigid timeline. Given this, I am writing to follow up from my email last week to see when you will be able to provide a response to the question posed on July 9 (see below).
Thank you,
Neal

==========

Neal Desai
Senior Pacific Regional Director
National Parks Conservation Association
Mobile: 510.368.0845 |ndesai@npca.org

From: Neal Desai
Sent: Wednesday, July 23, 2025 11:30 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: RE: Request to talk re: Soda Mountain Solar opt-in

Hi Lisa and Kaycee,
Do you have a sense of timeframe for when you might be able to get back to me on this question? Thank you,
Neal

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, July 10, 2025 9:07 AM
To: Neal Desai <ndesai@npca.org>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Request to talk re: Soda Mountain Solar opt-in

Hi Neal,

Thank you for your question, We are looking into this and will get back to you.

Thanks,

Lisa

From: Neal Desai <ndesai@npca.org>
Sent: Wednesday, July 9, 2025 9:38 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: RE: Request to talk re: Soda Mountain Solar opt-in

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Hi Lisa and Kaycee,
Thank you for following up. I was planning to email you today about my question, which is slightly different than what is noted in your email:

- In the AB 205 process, does CEC allow an applicant use an interconnection agreement (which, factually, is negotiated with a third party and not the CEC) as reasoning (e.g. substantial evidence) to not adopt mitigation measures due to claims of economic infeasibility?

Could you please provide me with a response to that question? The answer to this question informs whether there is a previously unknown backdoor loophole in the AB 205 process for applicants to evade adopting mitigation measures by **first** securing an interconnection agreement and **then** using that agreement to prevent project modifications (e.g. mitigation measures) in the AB 205 process. I believe this is a yes or no type of answer, meaning the CEC either categorically allows for the interconnection agreement to be used as reasoning (e.g. substantial evidence) or it doesn't. If there is grey area, then we would like to know what that is and the objective criteria used to assess if an interconnection agreement is substantial evidence or not.

Thank you,
Neal

==========

Neal Desai
Senior Pacific Regional Director
National Parks Conservation Association
Mobile: 510.368.0845 |ndesai@npca.org

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, July 9, 2025 8:21 AM
To: Neal Desai <ndesai@npca.org>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Request to talk re: Soda Mountain Solar opt-in

Hi Neal,

We internally discussed your question about whether the applicant's claim that the ¼ mile buffer would conflict with their interconnection agreement with LADWP to provide 300 MW of capacity.

The applicant's claim that the buffer would conflict with the agreement with LADWP may be insufficient to claim economic infeasibility. The applicant's claims need to be supported by substantial evidence in the record.

Thanks,

Lisa

Lisa Worrall

Senior Environmental Planner

California Energy Commission

Siting, Transmission and Environmental Protection Division

715 P Street, MS-40, Sacramento, CA 95814

Direct: (916) 661-8367

Email: lisa.worrall@energy.ca.gov

From: Neal Desai <ndesai@npca.org>
Sent: Friday, June 13, 2025 11:45 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Energy - STEP Siting <STEPsiting@energy.ca.gov>
Subject: Re: Request to talk re: Soda Mountain Solar opt-in

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Hi Lisa,
Just left you a voice message at the 8367 number and including here the email address listed on the project webpage in hopes of hearing back and talking Monday (or today). thanks,
Neal
510-368-0845

From: Neal Desai <ndesai@npca.org>
Sent: Wednesday, June 11, 2025 6:41 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Luke Basulto <lbasulto@npca.org>
Subject: Re: Request to talk re: Soda Mountain Solar opt-in

Hi Lisa,
If you're back, could we please find time Fri or Mon for a few mins? On Friday, I'm free after 9:30am. Anything work for you? Thank you,
Neal

From: Neal Desai <ndesai@npca.org>
Sent: Monday, June 2, 2025 8:58 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Cc: Luke Basulto <lbasulto@npca.org>
Subject: Re: Request to talk re: Soda Mountain Solar opt-in

Hi Lisa,
Writing to bump this meeting request up. Please let us know if you have availability this week to meet. Thank you,
Neal

From: Neal Desai <ndesai@npca.org>
Sent: Tuesday, May 20, 2025 10:15 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Luke Basulto <lbasulto@npca.org>
Subject: Request to talk re: Soda Mountain Solar opt-in

Hi Lisa,
Hope you're doing well. Writing to request a virtual meeting to discuss Soda Mountain Solar, including the current status of it. Could you please let us know if you have availability over the next week or two, and if you want to suggest any date/time options? I can coordinate schedules on my end with my colleague Luke (cc'd and who is our desert program manager based in Joshua Tree) to confirm something.
Thank you,
Neal

==========

Neal Desai
Senior Director, Pacific Region | National Parks Conservation Association
Mobile: 510.368.0845 |ndesai@npca.org

From: Neal Desai
Sent: Wednesday, January 29, 2025 12:15 PM
To: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Cc: Vorters, Dian@Energy <Dian.Vorters@Energy.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: RE: Soda Mountain Solar opt-in process

Hi Lisa,
Do you happen to know the status of application? Also, for this type of opt-in process, is commenting publicly during the noticed comment periods the only way for organizations/individuals to participate in this process, or are there other levels of engagement like requesting to be a "party" in the proceeding etc.?
Thank you,
Neal

From: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Sent: Friday, September 20, 2024 4:00 PM
To: Neal Desai <ndesai@npca.org>
Cc: Vorters, Dian@Energy <Dian.Vorters@Energy.ca.gov>; Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: RE: Soda Mountain Solar opt-in process

Hi Neal –

The applicant told us this week of their intention to file supplemental application materials in mid-October in response to the CEC's incompleteness determination here https://efiling.energy.ca.gov/GetDocument.aspx?tn=258896&DocumentContentId=94970. The CEC has 30 days to

review the supplemental information so I would agree, a determination of completeness would be issued no earlier than mid-November. This webpage here has the general timeframes for the Opt-in process Opt-in Certification Program

I've copied CEC's project manager for the Soda Mountain Solar Project, Lisa Worrall.

Regards,
Eric

Eric Knight
Manager
Siting & Environmental Branch
Siting, Transmission & Environmental Protection Division
California Energy Commission
(916) 591-9931

From: Neal Desai <ndesai@npca.org>
Sent: Friday, September 20, 2024 12:40 PM
To: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Cc: Vorters, Dian@Energy <Dian.Vorters@Energy.ca.gov>
Subject: RE: Soda Mountain Solar opt-in process

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Hi Eric,
The project proponent informed us last month that they don't expect the CEC to determine the application as being complete until November 2024 at the earliest. Is that the current timeframe from CEC's perspective?
Thank you,
Neal

From: Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Sent: Friday, July 12, 2024 3:37 PM
To: Neal Desai <ndesai@npca.org>
Cc: Luke Basulto <lbasulto@npca.org>; Vorters, Dian@Energy <Dian.Vorters@Energy.ca.gov>
Subject: FW: Soda Mountain Solar opt-in process

Hi Neal,

That is correct, the applicant intends on filing an opt-in application with the CEC by July 22nd. Those signed up for the CEC subscription "Siting Division General List" California Natural Resources Agency (govdelivery.com) – see 4th subscription under Power Plant Licensing Projects – will receive an email alert that the docket has been opened for this proceeding. That alert will recommend signing up for the Soda Mountain Solar subscription to continue to receive email alerts about the project. That subscription will appear in the list under "Project Under Review Topics".

Similar to the other 4 projects filed under the Opt-in program Power Plant Listing (ca.gov), Soda Mountain Solar will have its own webpage on the CEC's website where you can access its docket log, sign up for the subscription, access the e-comment and e-filing feature, etc. The docket is where the applicant will upload their application materials. Once CEC

has confirmed that we've received all files associated with their application, we'll initiate our 30-day completeness review – there will be an announcement of that in the docket.

Please let me know if you have any further questions.

Eric

Eric Knight
Manager
Siting & Environmental Branch
Siting, Transmission & Environmental Protection Division
California Energy Commission
(916) 591-9931

From: Neal Desai <ndesai@npca.org>
Sent: Friday, July 12, 2024 8:36 AM
To: Energy - STEP Siting <STEPsiting@energy.ca.gov>
Cc: Luke Basulto <lbasulto@npca.org>
Subject: Soda Mountain Solar opt-in process

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Hi Eric,
Writing to check-in on a project called Soda Mountain Solar that we heard has abandoned its review process under CDFW and is seeking approval via CEC, I believe through the opt-in process under AB 205. Is this correct and if yes, could you share with us where things are at (eg pre application stage?, application submitted?, etc). If any materials have been submitted by the applicant, would you be able to please share them with us?
Thank you,
Neal

==========

Neal Desai
Senior Program Director, Pacific Region | National Parks Conservation Association
Mobile: 510.368.0845 |ndesai@npca.org
(Pronouns: he/him/his)

Preserving Our Past. Protecting Our Future.
Speak up for national parks. Join us at npca.org

From: Neal Desai [ndesai@npca.org]
Sent: 8/13/2025 3:20:20 AM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Soda Mountain- Staff response to your question

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Thank you for this information, Lisa.
Neal

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Tuesday, August 12, 2025 2:42 PM
To: Neal Desai <ndesai@npca.org>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Soda Mountain- Staff response to your question

Hi Neal,

The CEC may consider a third-party Interconnection Agreement as evidence supporting an applicant's claim that certain mitigation measures are economically or legally infeasible. Submission of the agreement does not imply concurrence; the CEC will independently evaluate the claim in accordance with CEQA, the CEQA Guidelines, and other applicable laws are regulations.

Generally speaking, the criteria employed by the CEC in evaluating feasibility are grounded in established principles derived from CEQA case law. Because feasibility determinations are inherently fact-specific and context-dependent, further elaboration is not possible outside the context of a particular project. Each feasibility analysis must be tailored to the unique circumstances, objectives, and constraints of the project under review.

Although we appreciate your concern regarding Soda Mountain's specific claim of infeasibility, the CEC is currently undergoing review of the project and we do not have further information to provide at this time.

If deemed necessary, an analysis of the applicant's claim of infeasibility will be evaluated in the DEIR.

Thank you,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Neal Desai <ndesai@npca.org>
Sent: Thursday, August 7, 2025 7:35 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: RE: Soda Mountain- Staff response to your question

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Hi Lisa,
The Staff's response, from my perspective, does not respond to my two-part question. The response shares general points about (1) feasibility being a recognized metric in CEQA and (2) applying facts of a specific case to assess feasibility. Staff's response doesn't answer: **can** an Interconnection Agreement be submitted by an applicant to claim infeasibility and if yes, **what** are criteria that the CEC will use to objectively assess the unique facts of each Interconnection Agreement to determine if it agrees/disagrees the applicant's claim?

Let me try this differently. Is it inaccurate for me to state that the following in RED is CEC's position?:

In the AB 205 review:

- Categorically, the CEC is allowed to determine that a third-party Interconnection Agreement is reasoning to not adopt mitigation measures because the mitigation measures would make the project economically or legally infeasible, due to the terms of said third-party Interconnection Agreement.
- The CEC authorizes a project applicant to submit its third-party Interconnection Agreement as economic or legal infeasibility reasoning for why it cannot implement mitigation measures.
- Just because CEC authorizes a project applicant to submit its Interconnection Agreement to make a claim of economic or legal infeasibility, it doesn't mean the CEC agrees with the applicant's claim. CEC independently assesses and makes its own determination.
- In independently assessing and making its determination, the CEC uses the following criteria to objectively assess the unique facts of the Interconnection Agreement:
    - [CEC Staff: what is the criteria that CEC will use for this objective assessment?]

I hope you can appreciate that this is not some hypothetical exercise. Here are just a sample of statements from the applicant's TN#261667 filing on why buffer mitigation measures are legally and economically infeasible:

- *"Practical limitations, such as direct conflicts with legal agreements contained within the LADWP Interconnection Agreement and Facilities Studies, create an infeasible scenario for reducing the project footprint."*
- *"A significant reduction in size caused by implementing a 0.25-mile buffer from areas with 10% slope would be prohibited under the current agreement and would result in the triggering of a "material modification process" with LADWP, further causing re-study and amendment of the Agreement."*
- *"Implementing a 0.25-mile buffer from areas with 10% slope may also result in a breach of the LADWP Agreement that could result in a termination of this agreement, which has significant economic consequences and creates a situation that makes implementing a 0.25-mile buffer infeasible."*

I'm also available to meet with the CEC legal staff.

Thank you,
Neal

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, August 7, 2025 4:51 PM
To: Neal Desai <ndesai@npca.org>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Soda Mountain- Staff response to your question

Hi Neal,

On July 9, 2025, you asked the following question:

- In the AB 205 process, does CEC allow an applicant use an interconnection agreement (which, factually, is negotiated with a third party and not the CEC) as reasoning (e.g. substantial evidence) to not adopt mitigation measures due to claims of economic infeasibility?

Could you please provide me with a response to that question? The answer to this question informs whether there is a previously unknown backdoor loophole in the AB 205 process for applicants to evade adopting mitigation measures by **first** securing an interconnection agreement and **then** using that agreement to prevent project modifications (e.g. mitigation measures) in the AB 205 process. I believe this is a yes or no type of answer, meaning the CEC either categorically allows for the interconnection agreement to be used as reasoning (e.g. substantial evidence) or it doesn't. If there is grey area, then we would like to know what that is and the objective criteria used to assess if an interconnection agreement is substantial evidence or not.

Here is staff's response:

There is not a unique loophole in the AB 205 process for applicants to evade adopting mitigation measures. Feasibility is a recognized metric in CEQA and the feasibility of particular mitigation or alternatives are applied on a case by case basis as each project has unique facts.

Staff is in the early stages of evaluating the project to determine what the potential impacts may be and what mitigation may be necessary. As part of this evaluation, staff reviews materials submitted to the docket, which includes the applicant's submittals, and coordinates with agencies, like California Department of Fish and Wildlife.

Best,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov


CALIFORNIA ENERGY COMMISSION
50 YEARS OF ENERGY LEADERSHIP

From: Patrovsky, Joan E [jpatrovs@blm.gov]
Sent: 8/28/2025 6:55:52 PM
To: lisa worrll [lworrll@energy.state.ca.us]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
CC: Stamer, Marc R [mstamer@blm.gov]
Subject: BLM & CEC - Soda Mtn Solar Project Amendment
Attachments: IM Department Review of Solar and Wind.pdf

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Good day Lisa and Karcee,

The Bureau of Land Management (BLM) greatly appreciates our ongoing interagency coordination regarding the proposed Soda Mountain Solar Project.

BLM Field Manager Marc Stamer and I would like to schedule a call with you to discuss the status of the amendment application filed, as well as our perspective on the NEPA schedule.

As you may be aware, the Administration—through recent Executive Orders and Department of the Interior (DOI) guidance—has established new procedures for renewable energy projects. Please see the attached memorandum outlining updated requirements for wind and solar projects. Under this direction, all such projects must undergo additional review by the DOI prior to further processing.

We would like to propose a 30-minute call on **Thursday, September 4**. Please let us know your availability.

Best regards,

Joan Patrovsky, PMP
Project Manager
U.S. Department of the Interior - Region 8 and 10
Bureau of Land Management
California Desert District Office



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From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 8/6/2025 5:51:06 PM
To: Crisp, Ann@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b89c4de7ece742679d19e1e3ee713dc2-Crisp, Ann@]; Chris Huntley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=018948a34a3149c4a3833144594ae8b3-ff2eee5c-df]; Jamison Miner [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e9a371186e0e402a994145a67d6e7684-546eb26e-f8]; Justin Wood [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=86ee559cfc814439b69a025b0961d2a2-536cef40-79]; Hannah Gbeh [hannah@resolutionenvironmental.com]
CC: Marlyng Gama [mgama@rinconconsultants.com]

Subject: Soda Mountain- Access road question
Location: Microsoft Teams Meeting

Start: 8/8/2025 9:00:00 PM
End: 8/8/2025 9:30:00 PM
Show Time As: Busy

Recurrence: (none)
Required Attendees: Crisp, Ann@Energy; Chris Huntley; Jamison Miner; Justin Wood; Hannah Gbeh
Optional Attendees: Marlyng Gama

We would like to meet to discuss the access roads. Our bio staff reviewed the photos and noted that the road is narrow and would not be able to support two-way traffic. We are wondering if turn outs that will accommodate passing or two-way traffic have been identified?

Staff noted that it also looks like the road near photo point 8 crosses a very large wash that will likely require regrading after large storm events. We do not want to hamstring the applicant should a storm require regrading or a road section require some modification to allow for safe equipment deliveries.

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 288 739 925 553 0

Passcode: Ur9JX7aT

Dial in by phone

+1 916-562-1816,,874170598# United States, Sacramento

Find a local number

Phone conference ID: 874 170 598#

For organizers: Meeting options | Reset dial-in PIN

From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 7/21/2025 11:44:29 PM
To: Hannah Gbeh [hannah@resolutionenvironmental.com]
Subject: Soda Mountain- Confidential filing in response to WS-1

Hi Hannah,

Our Worker Safety and Fire Protection staff have noted there is to be a confidential filing in response WS-1. I don't see a request for confidentiality in the docket, so assume this item hasn't been filed yet.

Can you let me know when you submit it to the docket.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 7/23/2025 1:35:22 AM
To: Hannah Gbeh [hannah@resolutionenvironmental.com]
CC: Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Fooks, Brett@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=870df74143964b71ada0039bf13c5a9a-Fooks, Bret]; Paul Miller [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=4d4ce365f8bd442a8cb7d479381e2476-8906af8e-0e]; Daniel Jones [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=352cfed2f4d849749d3d8f98a9563279-082cef18-97]
Subject: Fw: Soda Mountain Completeness Review

Hi Hannah,

Our Worker Safety have a question on your response. Please see email below.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Daniel Jones <Djones@therchgroup.com>
Sent: Tuesday, July 22, 2025 6:33 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Fooks, Brett@Energy <Brett.Fooks@energy.ca.gov>; Paul Miller <pmiller@therchgroup.com>
Subject: Soda Mountain Completeness Review

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Hello Lisa,

In reviewing the REV 1 data request responses for Worker Safety we have the following informal data request question for the applicant:

- Please confirm the following statement in Appendix Q Worker Safety – July 2025 Update (page 24) is incorrect: "An approximately 22,500-gallon tank would be located near the operation and maintenance building to provide storage of fire suppression water." It is staff's understanding that three 10,000-gallon water tanks would be located throughout the site as specified in the Updated Project Description (July 2025 update) and shown on the Site Plan provided in the Confidential Worker Safety Data Responses.

Thank you,

Dan Jones

RCH GROUP
planning & environmental consulting

(916) 764-0295 (cell)
DJones@TheRCHGroup.com

From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 7/23/2025 11:19:45 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
Subject: Re: Soda Mountain - JD Files

Can you invite your land use staff? Thanks.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Wednesday, July 23, 2025 3:33 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Re: Soda Mountain - JD Files

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I am hoping to docket the bighorn sheep information tomorrow.

And - we are happy to discuss any items during our Thursday meeting.

Thanks!
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, July 23, 2025 3:31:34 PM

To: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Re: Soda Mountain - JD Files

Thanks Hannah. When do you think we might get big horn sheep info? Also, we have questions on land use for tomorrow's meeting

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Wednesday, July 23, 2025 2:44 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Soda Mountain - JD Files

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Hi Lisa,

Attached are the GIS / Shape files for the JD.

If you need anything else, please let me know.

Thanks!

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 7/29/2025 3:49:18 PM
To: Patrovsky, Joan E [jpatrovs@blm.gov]
Subject: Re: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap

I have forwarded the meeting to our two land use staff members. Hopefully they can attend.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Patrovsky, Joan E <jpatrovs@blm.gov>
Sent: Monday, July 28, 2025 6:20 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Re: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap

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Hi Lisa,

I looked at our project calendar and we have a scheduled meeting for July 30th at 3pm with CEC.

Would this date/time still work? or we will need to look at next week.

Joan Patrovsky, PMP
Project Manager
U.S. Department of the Interior - Region 8 and 10
Bureau of Land Management
California Desert District Office



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From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, July 24, 2025 5:46 PM
To: Patrovsky, Joan E <jpatrovs@blm.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Tatiana Inouye <tinouye@aspeneg.com>; Negar Vahidi <nvahidi@aspeneg.com>
Subject: Re: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap

Thanks Joan for your email. Kaycee and I are available on the following days and times:
Friday 25th 12-2, 4-5
Monday 28th 8-9, 11-12:30
Tuesday 29th 9-11:30, 2:30-3, 4-5

Tatiana, Negar and Joan, please let me know all the days and times you can meet.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Patrovsky, Joan E <jpatrovs@blm.gov>
Sent: Thursday, July 24, 2025 5:19 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Tatiana Inouye <tinouye@aspeneg.com>; Negar Vahidi <nvahidi@aspeneg.com>
Subject: Re: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap

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Hello Lisa,

The Bureau of Land Management (BLM) has determined that an Environmental Assessment (EA) is necessary to comply with NEPA regulations. However, the project holder is in disagreement on our determination.

Our renewable energy coordinator has scheduled a hybrid meeting with the Soda Mountain applicant and their representatives, along with the BLM State Office, on August 12. The purpose of this meeting is to discuss their concerns regarding the level of NEPA review and any other related issues.

To date, proposed changes to the Soda Mountain Solar project have not been submitted in a revised Plan of Development; the last version we have is dated March 2025. It is important that all proposed changes be evaluated together rather than individually.

Could you please provide some potential dates and times for a call?

Attendees from our side would include Barstow Field Manager Marc Stamer (mstamer@blm.gov), BLM Realty Specialist Isabeau Cordes (icordes@blm.gov), and myself. Our renewable energy coordinator, Nancy Robledo (lrobledo@blm.gov), might attend to share updates on ongoing directive changes for BLM solar projects.

Also, please note that Zoey (Caroline) Kaufman has left BLM for private endeavors.

Thank you, and I look forward to coordinating with you.

Best regards,

Joan Patrovsky, PMP
Project Manager
U.S. Department of the Interior - Region 8 and 10
Bureau of Land Management
California Desert District Office



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From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, July 24, 2025 12:54 PM
To: Patrovsky, Joan E <jpatrovs@blm.gov>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Tatiana Inouye <tinouye@aspeneg.com>; Negar Vahidi <nvahidi@aspeneg.com>
Subject: [EXTERNAL] Soda Mountain Solar Project- Meeting request asap

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Hi Joan,

I would like to meet with you and other BLM staff as necessary to discuss some land use questions our staff has.

The applicant states that the current project would be consistent with the project that was approved by the BLM in a 2016 Record of Decision. Is that correct?

We understand that BLM has proposed an amendment to the West-Wide Energy Corridor that includes adjustments to energy corridor designations and revisions to IOPs. Would the BLM incorporate the proposed IOP revisions, where applicable, into the permit conditions for the proposed project's ROW grant authorization?

We are working to deem the Opt-In application complete next week and would like to discuss these questions and possibly other associated questions this week.

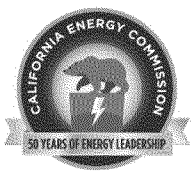
Please let me know your availability so I can send an invite to you.

Thanks kindly,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 7/30/2025 8:45:43 PM
To: Patrovsky, Joan E [jpatrovs@blm.gov]
CC: Cabrera, Crystal@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ed6e32a127144ccfa19a6f4347765a9e-00a33618-ff]; Black, Devin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c6ec9f417a6e448aae52465b9f719b5d-ea9475b4-16]; Ponce, Mariah@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc5faa5d564c4cf3a2f49468b736b6c2-b2346f64-e7]
Subject: Re: [EXTERNAL] BLM legal contact for a discussion with CEC legal staff re Soda Mountain Solar Project

Our legal staff would like to meet with yours to discuss several questions we have for Soda Mountain. We are on track to find the application complete and thus begin the 270 approval process. It would be helpful to have someone from legal to talk with initially.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Patrovsky, Joan E <jpatrovs@blm.gov>
Sent: Wednesday, July 30, 2025 1:31 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Cabrera, Crystal@Energy <Crystal.Cabrera@Energy.ca.gov>; Black, Devin@Energy <Devin.Black@Energy.ca.gov>; Ponce, Mariah@Energy <Mariah.Ponce@Energy.ca.gov>
Subject: Re: [EXTERNAL] BLM legal contact for a discussion with CEC legal staff re Soda Mountain Solar Project

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Lisa,

At this point, a solicitor has not been assigned.

Would need to see IF one is available for assignment.
Generally one is not assigned until we have a NEPA document ready for their review or special consultation request.

Joan Patrovsky, PMP
Project Manager
U.S. Department of the Interior - Region 8 and 10
Bureau of Land Management
California Desert District Office



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From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, July 30, 2025 1:14 PM
To: Patrovsky, Joan E <jpatrovs@blm.gov>
Cc: Cabrera, Crystal@Energy <Crystal.Cabrera@Energy.ca.gov>; Black, Devin@Energy <Devin.Black@Energy.ca.gov>; Ponce, Mariah@Energy <Mariah.Ponce@Energy.ca.gov>
Subject: [EXTERNAL] BLM legal contact for a discussion with CEC legal staff re Soda Mountain Solar Project

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Hi Joan,

Can you remind me who your legal staff is for this project? Our legal staff have asked me for this information.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov


CALIFORNIA ENERGY COMMISSION
50 YEARS OF ENERGY LEADERSHIP

From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 7/31/2025 5:26:46 PM
To: Hannah Gbeh [hannah@resolutionenvironmental.com]
Subject: Fw: Review docketed items for Soda Mountain and confirm you are complete - ATTY-CLIENT PRIV

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Tatiana Inouye <TInouye@aspeneg.com>
Sent: Thursday, July 31, 2025 10:11 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>; Jamison Miner <jminer@aspeneg.com>; Justin Wood <jwood@aspeneg.com>; Negar Vahidi <nvahidi@aspeneg.com>; Chris Huntley <chuntley@aspeneg.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>; Ponce, Mariah@Energy <Mariah.Ponce@Energy.ca.gov>; Black, Devin@Energy <Devin.Black@Energy.ca.gov>; Cabrera, Crystal@Energy <Crystal.Cabrera@Energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Subject: RE: Review docketed items for Soda Mountain and confirm you are complete - ATTY-CLIENT PRIV

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

As it relates directly to the REV 2 Land Use DRRs, based on our meeting with BLM yesterday, our Team has an approach on how to proceed with the analysis. However, as we were reviewing yesterday's docket filings, we found a major inconsistency in the discussion of whether Rasor Road will remain open or closed. This discussion has substantial implications for multiple issues, including Land Use, Transportation, etc. Note that permanent closure of the road would require a Plan Amendment, which BLM emphasized in yesterday's call that they are not willing to approve another CDCA Plan amendment for this project. Below is the list of the current discrepancies in the docket filings (see highlighted text):

- **TN 265146 (July 30, 2025 – 3-11 Land Use and Planning), page 3.11-26:**

The project would utilize Rasor Road as the primary access road into the site, which also provides access to the Rasor OHV recreation area. The project would close Rasor Road during the approximately 18 months of project construction for site security, and for the duration of the project's anticipated 35-year operations. Public access to the Rasor OHV recreation area would be maintained from the Basin Road exit on I-15, as well as from the Rasor Road exit via existing primitive BLM motorized routes such as AC8825, reducing potential impacts to recreation facilities and maintaining off-road vehicles access. The project would implement APM REC-1 to communicate any access changes to the public. See Section 3.16, Recreation.

- **TN 264913 (Updated Project Description and Responses to REV 1 DR BIO-2 and REV 1 DR ES-1), page 2-19:** Rasor Road will be permanently open to the public during both project construction and operation. In order to allow public access to the Rasor OHV recreation area. Rasor Road would continue to serve as the main access point for the public into the Rasor OHV recreation area. During project construction and operation, the public would access the Rasor OHV area by traveling through the on-site portion of Rasor Road that has been improved, maintained and aligned to avoid solar panels throughout the project site. Rasor Road would be located between Array 3 and Array 4 and would continue to allow public access to the Rasor OHV recreation area. The solar arrays would be fenced and gated to ensure no public access to the project facilities.

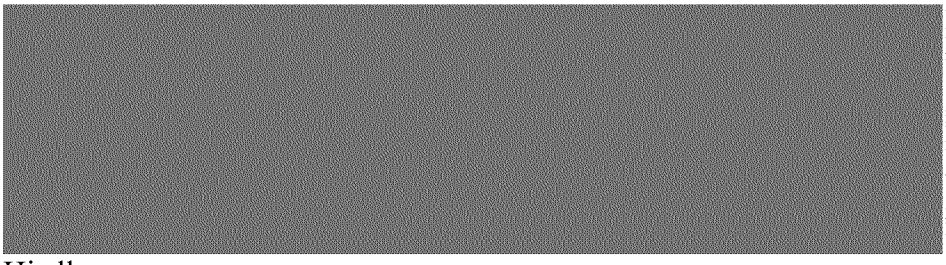
- **TN 259876 (CEC Data Request Response Set #1), page 26:**
  DR TRANS-10: On page 3.17-24 in Section 3.17 Transportation, there is a reference to eliminating Rasor Road access to the Rasor OHV during construction. Would there be an alternative route for access to OHV during this period or would it be inaccessible? What is the expected duration of the closure?
  Response: This information is provided in Chapter 3-16 Recreation, Section 3.16.3.4 Impact Assessment on pages 3.16-10 – 3.16-11. The project would close Rasor Road during the approximately 18 months of project construction for site security. During that time, public access to the Rasor OHV recreation area would be maintained from the Basin Road exit on I-15.

Thank you,

Tatiana Inouye
Senior Environmental Planner
Land Use & Public Policy
Aspen Environmental Group
Office: 818-338-6762
Cell: 805-630-0972

Learn more about our Planning & Public Policy services.

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, July 30, 2025 4:48 PM
To: Ackerman, James@Energy <james.ackerman@energy.ca.gov>; Jamison Miner <JMiner@aspeneg.com>; Justin Wood <jwood@aspeneg.com>; Tatiana Inouye <TInouye@aspeneg.com>; Negar Vahidi <NVahidi@aspeneg.com>
Cc: Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Crisp, Ann@Energy <Ann.Crisp@energy.ca.gov>
Subject: Review docketed items for Soda Mountain and confirm you are complete



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Hi all,

We have just received responses to the docket to our REV 2 data requests. Can you review them and let me know whether you can confirm your technical area is complete.

Jamie and Justin, let me know how many field verification sites you would need for the waters data. Hannah didn't have a problem with site verification.

I need to know if your technical section is complete or if not, what would be necessary for it to be complete, by **10 am**. If you have additional requests after you have reviewed this information, I will need to know what you need and get the applicant's agreement to provide it by a date certain.

We can meet with the applicant if needed tomorrow.

I will update the sharepoint folder with the docketed items: REV 2 Data Responses

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 7/31/2025 5:55:39 PM
To: Hannah Gbeh [hannah@resolutionenvironmental.com]
Subject: WEMO- for Soda Mountain Solar Project

EplanningUi

Record of Decision: Appendix B - Errata to WMRNP Final LUPA and SEIS October 2019 - Parts A through C

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 8/18/2025 6:00:38 PM
To: Williams, Kevin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=8dcf221acdd54a37a2234d4a5c3ce049-Williams, K]
CC: Hannah Arkin [hannah@resolutionenvironmental.com]
Subject: Fw: Soda Mt. Solar
Attachments: Soda Mt. Solar CEC Scoping Meeting.pdf

Hi Kevin,

Hannah will be able to supply a TV monitor. Can you check out her email below and let her know if there are any specific you need for the TV.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Monday, August 18, 2025 10:57 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Soda Mt. Solar

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

A few items for you related to Soda Mt. Solar:

1. Attached is the Applicant's presentation for the NOP Scoping Meeting. We will keep the presentation to a max of 5 minutes. If you have any requested revisions, please let me now.

2. Does your IT department have any specific requirements for the mobile TV monitor? I thought I should ask if there are any specific requests prior to renting this.
3. We will be docketing all items in the CEC's 7/31/25 Request for Information this week, within the requested 3 week timeline.
4. We had a productive call with the BLM today regarding the CEC's 8/11/25 request for a cultural resources survey of the access road. We are planning to submit the BLM forms today for their review and they indicated it would take up to a week to authorize this survey request. I just wanted to pass along this timeline to let you know we are working on this.

If you need anything from me, please don't hesitate to reach out.

Best,
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 8/25/2025 5:48:40 PM
To: Cruz, Manikhone [Manikhone.Cruz@dpw.sbcounty.gov]
CC: Sansonetti, Nancy [Nancy.Sansonetti@dpw.sbcounty.gov]
Subject: Re: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project

Thanks for that letter. I had posted it to the project's docket (online repository) when I received it in 2024.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Cruz, Manikhone <Manikhone.Cruz@dpw.sbcounty.gov>
Sent: Monday, August 25, 2025 9:42 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Sansonetti, Nancy <Nancy.Sansonetti@dpw.sbcounty.gov>
Subject: RE: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you Lisa,

Please find attached our comments for the subject project.

Regards,
Manikhone (Manie) Cruz
Planner III – Capital Improvement Section
Department of Public Works; Environmental Management Division
Phone: (909) 387-8109, Fax: (909) 387-7876
825 East Third Street, Room 123
San Bernardino, CA 92415-0835

SAN BERNARDINO COUNTY

Our job is to create a county in which those who reside and invest can prosper and achieve well-being.
www.SBCounty.gov

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Friday, August 22, 2025 5:32 PM
To: Rodriguez, Magdalena@Wildlife <Magdalena.Rodriguez@wildlife.ca.gov>; Calvert, Heidi@Wildlife <Heidi.Calvert@wildlife.ca.gov>; Sharma, Shankar@Wildlife <Shankar.Sharma@wildlife.ca.gov>; Wood, Brandy@Wildlife <Brandy.Wood@Wildlife.ca.gov>; Branch, Harllee@Wildlife <Harllee.Branch@Wildlife.ca.gov>; Lorentzen, Wayne@DTSC <Wayne.Lorentzen@dtsc.ca.gov>; Koch, Lori@DTSC <Lori.Koch@dtsc.ca.gov>; Ferouz, Muzhda@DTSC <Muzhda.Ferouz@dtsc.ca.gov>; Crader, Phillip@Waterboards <Phillip.Crader@waterboards.ca.gov>; Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>; Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; McCann, Lisa@Waterboards <lisa.mccann@waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Sansonetti, Nancy <Nancy.Sansonetti@dpw.sbcounty.gov>; Cruz, Manikhone <Manikhone.Cruz@dpw.sbcounty.gov>; info@sbcfire.org; Ornelas, Raylene <rornelas@sbcsd.org>; Liang, Aron <Aron.Liang@lus.sbcounty.gov>; Alaniz, David <David.Alaniz@dph.sbcounty.gov>; bradp@mdaqmd.ca.gov; Executive@CALFIRE <HQ.Executive@fire.ca.gov>; plenys.thomas@epa.gov; Katherine.kennedy@faa.gov; peter_sanzenbacher@fws.gov; Samples, Portia J <psamples@blm.gov>; icordes@blm.gov; Donnell, Julie A <jdonnell@blm.gov>; Anderson, Brandon G <bganderson@blm.gov>; Joan Patrovsky, PMP <jpatrovs@blm.gov>; afrancois@blm.cov; Jeff Ruesch <jruesch@mojavewater.org>; Taing, Adam@Waterboards <Adam.Taing@Waterboards.ca.gov>; Dennis.Lei@ladwp.com; Faranak.Sarbaz@ladwp.com; Sunaja.Lakshman@ladwp.com; Tin.Ha@ladwp.com
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Subject: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project

Some people who received this message don't often get email from lisa.worrall@energy.ca.gov. Learn why this is important

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Hello,

This week the California Energy Commission staff posted a notice of the August 29th Information and Environmental Scoping Meeting for the Soda Mountain Solar Project.

It will be a hybrid meeting via Zoom and in person at Holiday Inn Express in Barstow held between 1 to 5 pm.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 8/26/2025 10:58:37 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]
CC: DeLano, Kevin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=de745a362d214bfbb777e8fd9d9193da-5e9a22f8-24]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Soda Mtn: Prelim Geotech Report Request

Hi Hannah,

Yes, we do need a project site-specific preliminary geotechnical report. I am not sure why we missed this, but please provide it so we can analyze all potential geotechnical hazards. We would appreciate receiving this within 30 days.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Thursday, August 14, 2025 6:56 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: DeLano, Kevin@Energy <Kevin.DeLano@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Soda Mtn: Prelim Geotech Report Request

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Hi Lisa,

No, a site specific preliminary geotechnical investigation has not yet been prepared. However, we can get this report completed within approximately 30 days. We had intended to complete this work with our final engineering documents, but can expedite its completion instead, if that would be helpful.

Thank you,
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, August 13, 2025 11:16 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: DeLano, Kevin@Energy <Kevin.DeLano@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Fw: Soda Mtn: Prelim Geotech Report Request

Hi Hannah,

Please see Kevin's email below. Was a site-specific preliminary geotechnical investigation prepared?

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: DeLano, Kevin@Energy <Kevin.DeLano@energy.ca.gov>
Sent: Wednesday, August 13, 2025 11:13 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>

Cc: Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>
Subject: Soda Mtn: Prelim Geotech Report Request

Good Morning Lisa,

Do you know if the Soda Mtn applicant completed a site-specific preliminary geotechnical investigation? I can't find one on the docket. In Section 3.7 Geology and Soils - October 2024 - Revision 1 (TN 259702), the applicant doesn't cite a site-specific preliminary geotechnical investigation in text. However, in their references section, they do list the following 2010 report:

> Diaz Yourman & Associates (DYA). 2010. Preliminary Geotechnical Investigation (Phase 1A) Caithness Soda Mountain Solar Facility Project, Baker, San Bernardino County, California. December 7, 2010.

Would you please ask the applicant to clarify if they completed a site-specific preliminary geotechnical investigation? If yes, would you please ask them to docket the file?

Thank you,
Kevin

Kevin M. DeLano, P.G. 10178, M.S. (he/him/his)
Geosciences Unit
Siting, Transmission, and Environmental Protection Division
kevin.delano@energy.ca.gov
279-226-1043

Vice President for Rank and File
PECG River City Section



California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 7/22/2025 12:05:45 AM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Re: Your 6 confidential e-filing(s) successfully submitted

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Hi Lisa,

I just sent you the high-resolution visual report and the 3 modeling files for the air quality report via a SharePoint link. Please let me know if you have any issues receiving the files. The only remaining information for us to submit is the Bio-3 response (bighorn sheep). The consultant team is making the final edits to the report and we will docket it as soon as it becomes available.

If you need anything else, please let me know. We appreciate all your hard work on this project!

Thanks!
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Monday, July 21, 2025 4:55 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Re: Your 6 confidential e-filing(s) successfully submitted

Thanks Hannah.

Can you send me any updated and new GIS shape files? Let me know if you would like me to send a request via kiteworks.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission

Website: www.energy.ca.gov

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Monday, July 21, 2025 4:46 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Fw: Your 6 confidential e-filing(s) successfully submitted

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

The confidential filing has been made and is just awaiting approval (please see below).

Thanks!
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: eFiling@energy.ca.gov <eFiling@energy.ca.gov>
Sent: Monday, July 21, 2025 3:19:24 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Your 6 confidential e-filing(s) successfully submitted



Dear Hannah Arkin,
Your 6 confidential e-filing(s) were successfully submitted to Docket Number **24-OPT-03**, and will be reviewed by the Docket Unit.
Your e-filing was submitted on behalf of Soda Mountain Solar LLC.
The following file(s) were submitted:

- Title: **Application for Confidential Designation - July 2025**
  Document Description: Application for Confidential Designation - July 2025
  5 page(s)
  Subject(s): Air Quality, Greenhouse Gases
  Document Type: Document

- Title: **Confidential Worker Safety Data Responses**
  11 page(s)
  Subject(s): Worker Safety and Fire Protection
  Document Type: Document

- Title: **Appendix C_CONFIDENTIALApp C Att A Megapack_2_and_XL_-_ANSI-UL_9540A_Report**
  29 page(s)
  Subject(s): Air Quality, Greenhouse Gases
  Document Type: Document

- Title: **Appendix C_CONFIDENTIAL App C Att A Megapack_2_XL_Fire_Protection_Report**
  33 page(s)
  Subject(s): Air Quality, Greenhouse Gases
  Document Type: Document

- Title: **Confidential Appendix C Air Quality and GHG Report**
  203 page(s)
  Subject(s): Air Quality, Greenhouse Gases
  Document Type: Document

- Title: **Confidential SMSP Worker Safety Plan Update**
  42 page(s)
  Subject(s): Worker Safety and Fire Protection
  Document Type: Document

Another e-mail will communicate the results of the Docket Unit's review.
Thank you,
07/21/2025 15:19:24.397
For e-filing help or questions, send an e-mail to Docket@energy.ca.gov, or call 916-654-5076.

This is an automated e-mail message. Replies to this message will not be read or replied to. Instead e-mail this address with your questions or comments.

CALIFORNIA ENERGY COMMISSION

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State of California, Gavin Newsom, Governor

1516 Ninth Street
Sacramento, Ca 95814

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From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 7/23/2025 9:44:01 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Soda Mountain - JD Files
Attachments: JurisdictionalDelineation_Shapefiles_20250723.zip

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Hi Lisa,

Attached are the GIS / Shape files for the JD.

If you need anything else, please let me know.

Thanks!

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 7/29/2025 9:47:25 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Fw: Soda Mountain Venue Recommendations
Attachments: Memo - CEC Scoping Meeting Venues.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

Our suggestions for NOP venue locations are attached. Please let me know if you need us to make any further assistance.

Thank you!

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

CALIFORNIA STRATEGIES, LLC

MEMORANDUM

To: Hannah Arkin
From: California Strategies
Date: July 29, 2025
Re: Venue Options for CEC Notice of Preparation Public Scoping Meeting

---

To prepare for the California Energy Commission's (CEC) upcoming Notice of Preparation (NOP) Public Scoping Meeting, our team has conducted public source research to identify potential venues for a late August community hearing.

CEC Venue Requirements:
Based on the material you forwarded, we identified locations that meet the following parameters:

- Capacity for at least 50 attendees
- Space to accommodate 8 to 10 tables
- Availability for 4 hours, plus an additional 5 hours for audiovisual setup/teardown
- Technical capability to support computers, a projector, and a recording system for virtual participation

Search Summary:
Given Baker's rural location, there are few venues within the recommended five-mile radius of the project site that can accommodate approximately 45 attendees and meet the CEC's technical and spatial requirements. To identify feasible alternatives, we expanded our search to Barstow, the nearest larger community with greater hosting capacity, located approximately 63 miles west of Baker.

Recommended Venue Options:

1. **Baker High School Gymnasium (internet questions exist)**
   Address: 72100 Schoolhouse Ln, Baker, CA 92309

2. **Holiday Inn Express or Hampton Inn, Barstow (near the outlet malls)**
   Address: 2700 Lenwood Rd, Barstow, CA 92311
   NOTE – BLM has used these hotels for hybrid meetings.

3. **Barstow Community College Gymnasium**
   Address: 2700 Barstow Road, Barstow, CA 92311

Each of these venues meets the CEC's requirements and could serve as a suitable location for the Community Hearing.

Please let us know if you would like us to conduct site visits or begin the reservation process for any of the above locations.

U.S. BANK PLAZA
980 NINTH STREET, SUITE 2000 • SACRAMENTO, CA 95814
TELEPHONE (916) 266-4575 • FACSIMILE (916) 266-4580

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 7/31/2025 5:37:19 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Follow-up Questions Soda Mt. Water-1 Information

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Good morning! My revised responses to James Ackerman's (CEC) comments are below, in purple font (to differentiate from the initial responses provided in blue font).

Lisa: I agree that the four documents listed should be docketed.

However, I don't believe they address my concerns regarding my question that became Rev 2 DR WATER-1, namely that the data used for groundwater modeling was from outside the Soda Mountain groundwater subbasin.

The Hydrogeological Conditions and Groundwater Modeling Addendum (TRC Solutions 2013) and the Groundwater Modeling Sensitivity Analysis (Burns & McDonald 2014) were both appendices of the original BLM EIR for the Soda Mountain Solar project and addressed the impact to the public groundwater production well at the Zzyzx facility across the Soda Mountains for the project site.
As stated in these two documents, the data supporting the modeling was taken from local regional wells outside the Soda Mountain groundwater subbasin. – It is true that the 2013 (TRC Solutions) and 2014 (Burns & McDonald) documents contain information about groundwater modeling that was informed by data collected from regional wells outside the Soda Mountain Subbasin. However, the Water Supply Report prepared for the current project only cited those documents with respect to the test well (PW-1) and the observation well (OW-1) that were installed approximately 187 feet apart along Blue Bell Mine Road – those wells are not located on the current project site, but they are within the Soda Mountain Subbasin. Therefore, it is appropriate to use data collected from wells PW-1 and OW-1 as representative of groundwater conditions at the project site because they are in the same subbasin as the project site.

Moreover, these documents introduce additional questions:

- Will the locations of proposed production wells more closely resemble the Hydrogeological Conditions and Groundwater Modeling Addendum (5 wells) or the Groundwater Modeling Sensitivity Analysis (3 wells). – The location of the potential on-site well(s) is not currently known and will be determined through the engineering and design processes. However, that siting is not necessary to evaluate overall groundwater conditions in the Soda Mountain Subbasin underlying the Project site, consistent with the purpose of the Water Supply Report to demonstrate whether there's sufficient water supply available to support the proposed uses. The Water Supply Report completed that task using best available data and reasonable assumptions where necessary; clarification regarding the groundwater well data used in the Waer Supply Report are provided in the response above, and explanation regarding required groundwater monitoring is provided in the response below.
- The Groundwater Modeling Sensitivity Analysis proposes groundwater drawdown monitoring incorporating a network of five monitoring wells and the Zzyzx groundwater production well. Will this monitoring program be incorporated into the project? – Groundwater monitoring will be conducted as part of the project. The BLM's 2016 ROD for the previous project identified APMs that would be applied as mitigation measures and included groundwater monitoring requirements in APMs 17 and 18 (presented in full in the 2016 ROD Appendix 4, pages 4-38 and 4-39). APMs 17 and 18 require the applicant to recalibrate the groundwater model referenced in the 2013 (TRC Solutions) and 2014 (Burns & McDonald) documents and, if the recalibrated model indicates that outflow from the northeast outlet of the Soda Mountain Valley would be reduced by an amount in excess of 50 AFY, to develop and implement a groundwater monitoring plan. If the Project is shown to cause a decline in

groundwater level of 5 feet or more in the alluvial aquifer near Soda Spring, or if there is a decrease in groundwater discharge at Soda Spring that results in the water level in the spring to be less than 4 feet deep, which would threaten the tui chub, then an evaluation would be conducted to determine if the Project is causing reduced groundwater discharge at Soda Spring. If it is determined that the Project has caused a decrease in groundwater discharge at Soda Spring such that the spring is less than 4 feet deep, thereby threatening the tui chub habitat, then the Project would curtail withdrawal of groundwater and instead import a corresponding amount of water from outside of the Soda Mountain Valley.

In addition, the original Soda Mountain Solar project BLM EIR indicates that aquifer characterization was conducted from a test well (PW-1) and an observation well (OW-1) located 187 feet apart along Blue Bell Mine Road. – Yes- this is the well data cited in the Water Supply Report.

The following documents, in addition to the previous questions, would be beneficial in completing the analysis of impacts to the Soda Mountain subbasin groundwater resources: We have not been able to locate the documents listed below online. Considering they are project-specific geotechnical studies, and likely contain large maps and diagrams, they may only be available in hard copy format from the lead agencies for the 2015 document.

- Site specific geotechnical and geophysical data referenced in the TRC Solutions report;
    - Diaz-Yourman and Associates. 2010. Preliminary Geotechnical Investigation (Phase 1A), Caithness Soda Mountain Solar Facility Project, Baker, San Bernardino County, California. December 2010, 85 p.
- Terra Physics, 2010. Geophysical Characterization of Subsurface Physical Properties, Caithness LLC—Soda Mountain Solar Facility, Southwest of Baker, San Bernardino County, California, dated December 10, 2010, Project No. 09-63, 58 p. Prepared for Wilson Geosciences, December 2011.
    -
- Aquifer characterization reference cited in the Soda Mountain Solar project BLM EIR;
    - Panorama Environmental, Inc., 2014. Groundwater Well Test Report. November.

RINCON

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From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 7/31/2025 7:02:58 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Word Version of Project Description
Attachments: 2_Project Description_07-17-2025.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

Attached is the word version of our project description.

Thank you!
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

CHAPTER 2. PROJECT DESCRIPTION

2.1 Introduction

Soda Mountain Solar, LLC (applicant), proposes to construct, operate, and maintain a utility-scale solar photovoltaic (PV) electrical generating and storage facility and associated infrastructure to generate and deliver renewable electricity to the statewide electricity transmission grid. The project also includes future decommissioning, which is anticipated to occur after 40 years of operation. This project is known as the Soda Mountain Solar Project (proposed project or project).

The project is located on approximately 2,670 acres of land administered by the U.S. Department of Interior, Bureau of Land Management (BLM), California Desert District, within the jurisdiction of the Barstow Field Office in San Bernardino County. As described in Section 2.1, the BLM performed a separate review of the project under the National Environmental Policy Act (NEPA).

The project would disturb approximately 2,059 acres overall. The project would generate up to 300 megawatts (MW) of renewable energy and include up to 300 MW/1,200 MW-hours (MWh) of battery storage. The power produced by the project would be conveyed to the regional electrical grid through an interconnection with the existing Mead-Adelanto 500-kilovolt (kV) transmission line operated by the Los Angeles Department of Water and Power (LADWP).

2.2 Description of the Proposed Project

2.3 Project Location

The project is located entirely on federally owned land managed by the BLM. The 2,670-acre project site is located approximately 7 miles southwest of the community of Baker in unincorporated San Bernardino County, California (Figure 2-1, 2-2, and 2-3), approximately 50 miles northeast of Barstow. The project site is in portions of Sections 1 and 11–14, Township 12 North, Range 7 East; Sections 25, Township 13 North, Range 7 East; Sections 6, 7, and 18, Township 12 North, Range 8 East; Sections 17 – 21, 29-32, Township 13 North, Range 8 East, San Bernardino Meridian, California.

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

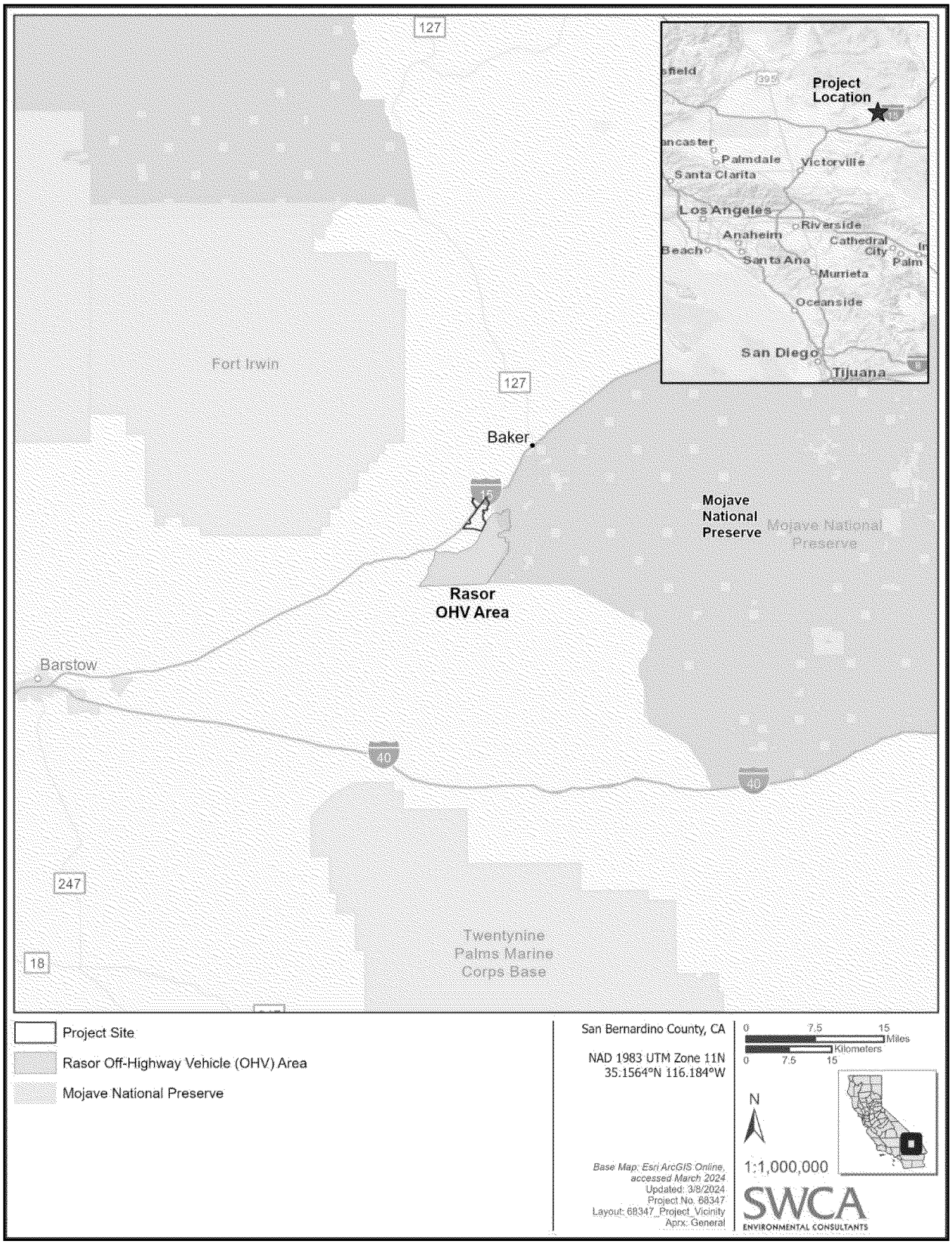


Figure 2-1. Project site vicinity.

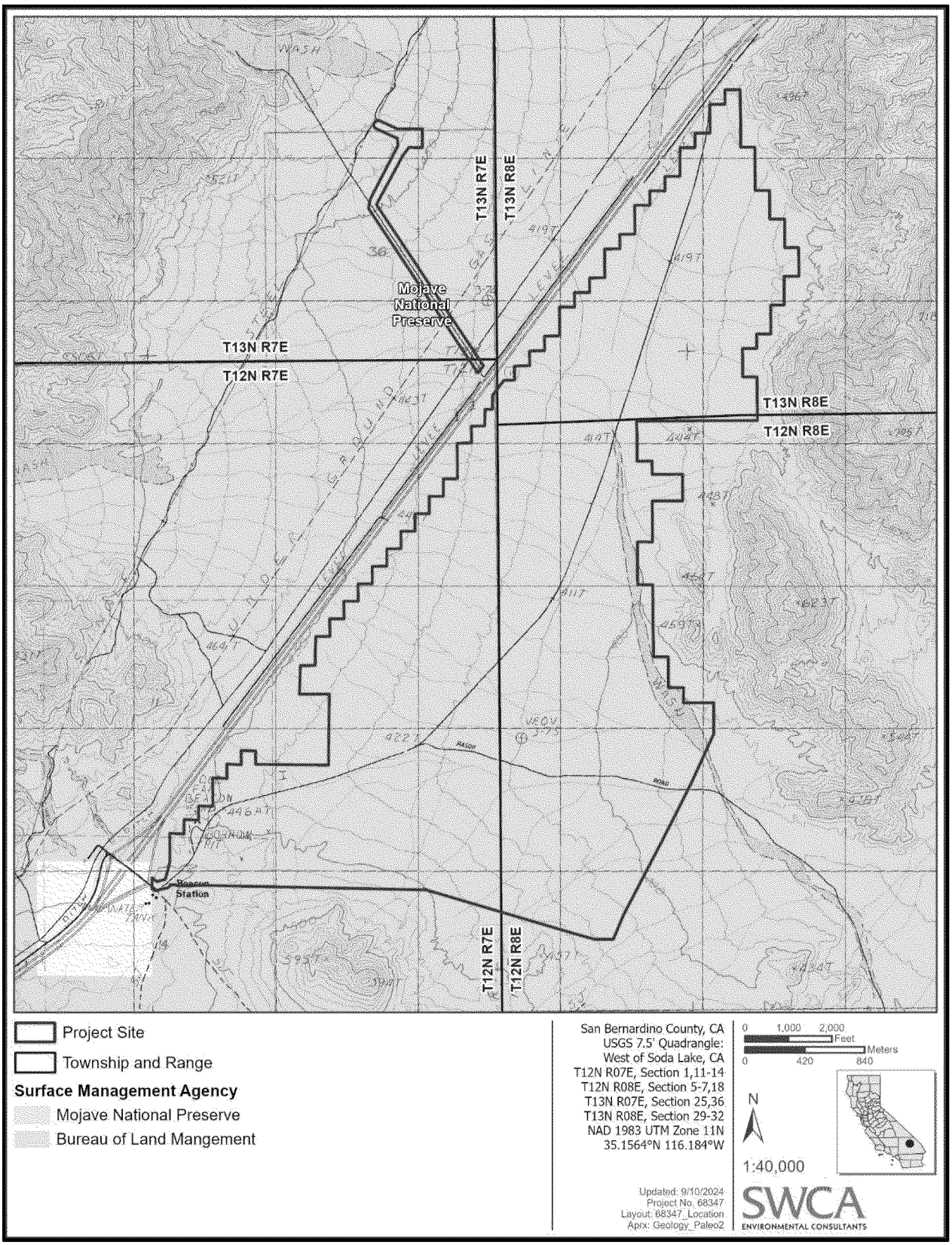


Figure 2-2. Public Land Survey location.

2.3.1.1 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 (Figure 2-4). Rasor Road, an unimproved BLM public access road, runs from the site's southwest corner and splits into two forks 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. Figure 2-4. Project site location and existing conditions. show the current existing conditions of the project site.

Based on a review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, unnamed tributaries are located east of the project site and flow from west to east (FEMA 2023). On-site runoff primarily drains to the southeast side of the project site. FEMA Zone D floodplains, which represent areas of undetermined flood hazards, are located within the project site. Additionally, the project is not located within the California Department of Water Resources (DWR) 100-year DWR Awareness floodplain. The project site is located in the Mojave Desert Air Basin and within a Soda Lake Valley Groundwater Basin sub-basin.

There are no existing overhead or underground transmission lines on the project site that would be affected by the proposed project. The infrastructure 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. The location of the fiber-optic cables is not publicly available. The two high-voltage electrical transmission lines to the west of I-15 are the Kramer 115-kV sub-transmission line operated by Southern California Edison (SCE) and the Mead-Adelanto 500-kV transmission line operated by the LADWP, as shown in Figure 2-3. The project would cross the I-15 in one underground bore or overhead to connect the gen-tie to the Mead-Adelanto transmission line. The Mead-Adelanto Transmission Project is a 202-mile-long, 500-kV alternating current (AC) transmission line that extends between a southwest terminus at the Adelanto substation in Southern California and a northeast terminus at Marketplace Substation approximately 17 miles southwest of Boulder City, Nevada.

2.3.1.2 LAND USE AND ZONING

As shown in Figure 2-3, the project site is located within the BLM's California Desert District, within the jurisdiction of the Barstow Field Office, and the planning boundary of the California Desert Conservation Area (CDCA) Plan and the Desert Renewable Energy Conservation Plan (DRECP). The BLM signed its Record of Decision (ROD) approving the DRECP Land Use Plan Amendment (LUPA) to the CDCA Plan in September 2016 (BLM 2016). The DRECP is a landscape-level plan established by the California Energy Commission, the BLM, the California Department of Fish and Wildlife (CDFW), and the U.S. Fish and Wildlife Service (USFWS) which plan covers 22.5 million acres of public land in seven California counties. The DRECP LUPA includes land use allocations to replace the multiple-use classes established in the CDCA Plan. The project is within lands classified as General Public Land for management. 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 and approval nor the Conservation and Management Actions (CMAs) outlined in the DRECP are applicable to this project.

The generation-tie line (gen-tie line) west of I-15 would be located within an Area of Critical Environmental Concern and a designated federal Section 368 Energy Corridor adjacent to I-15 (corridor number 27-225).

2.3.1.3 SITE SELECTION

The project site was selected given the BLM's issuance of a ROD and associated amendment to the CDCA Plan in March 2016. The site is located within a designated federal Section 368 Energy Corridor adjacent to I-15 (Corridor number 27-225). Additionally, an existing SCE-owned 115-kV sub-transmission line and an LADWP-operated 500-kV transmission line run parallel to and adjacent to the western perimeter of the project site. The project site is located immediately adjacent to existing roadways that provide readily available access for construction and operations. The project site was selected based on consideration of the project objectives, engineering constraints, site geology, environmental impacts, water, waste and fuel constraints, and electric transmission constraints, among other factors.

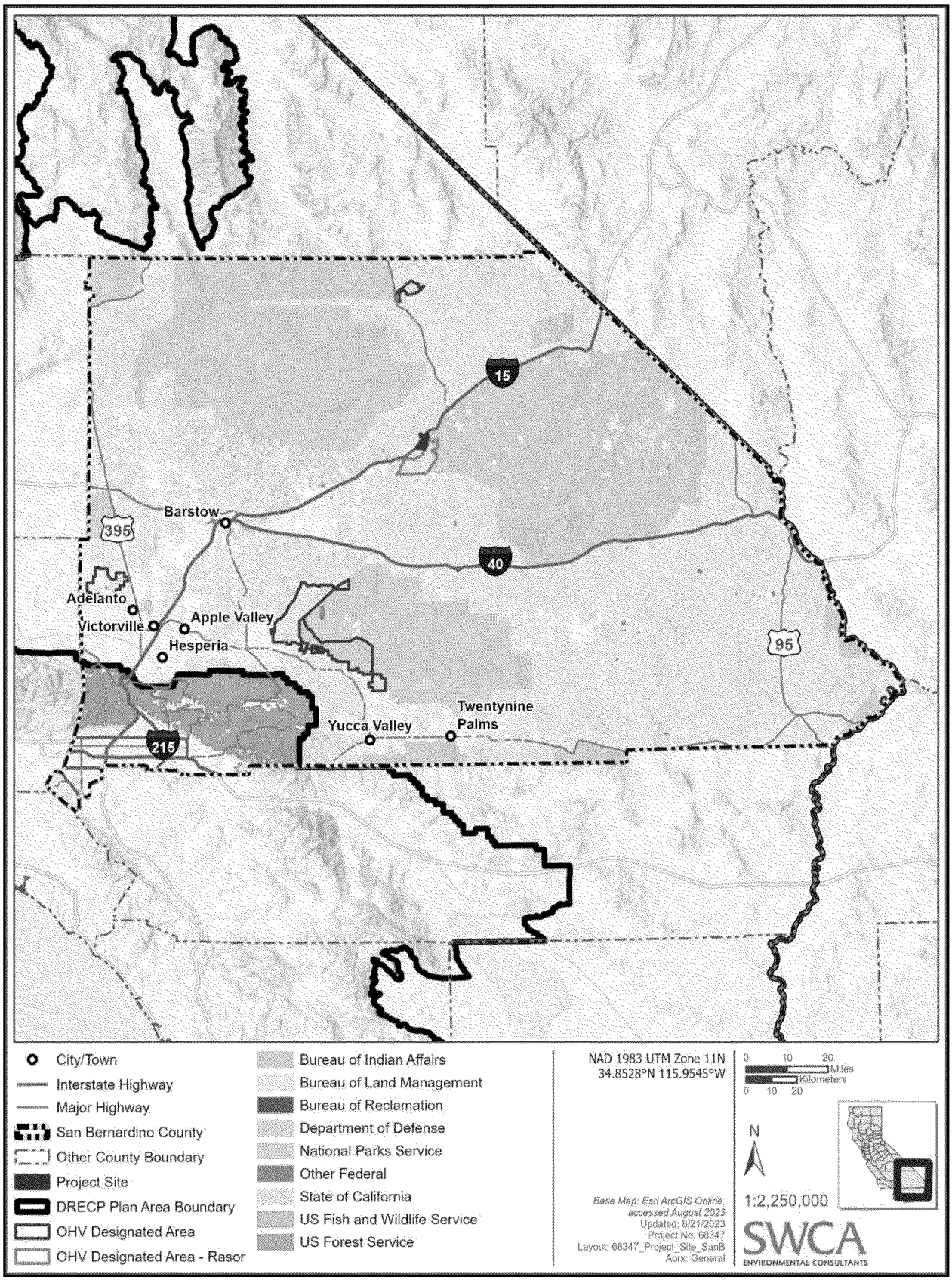


Figure 2-3. Land use management in San Bernardino County.

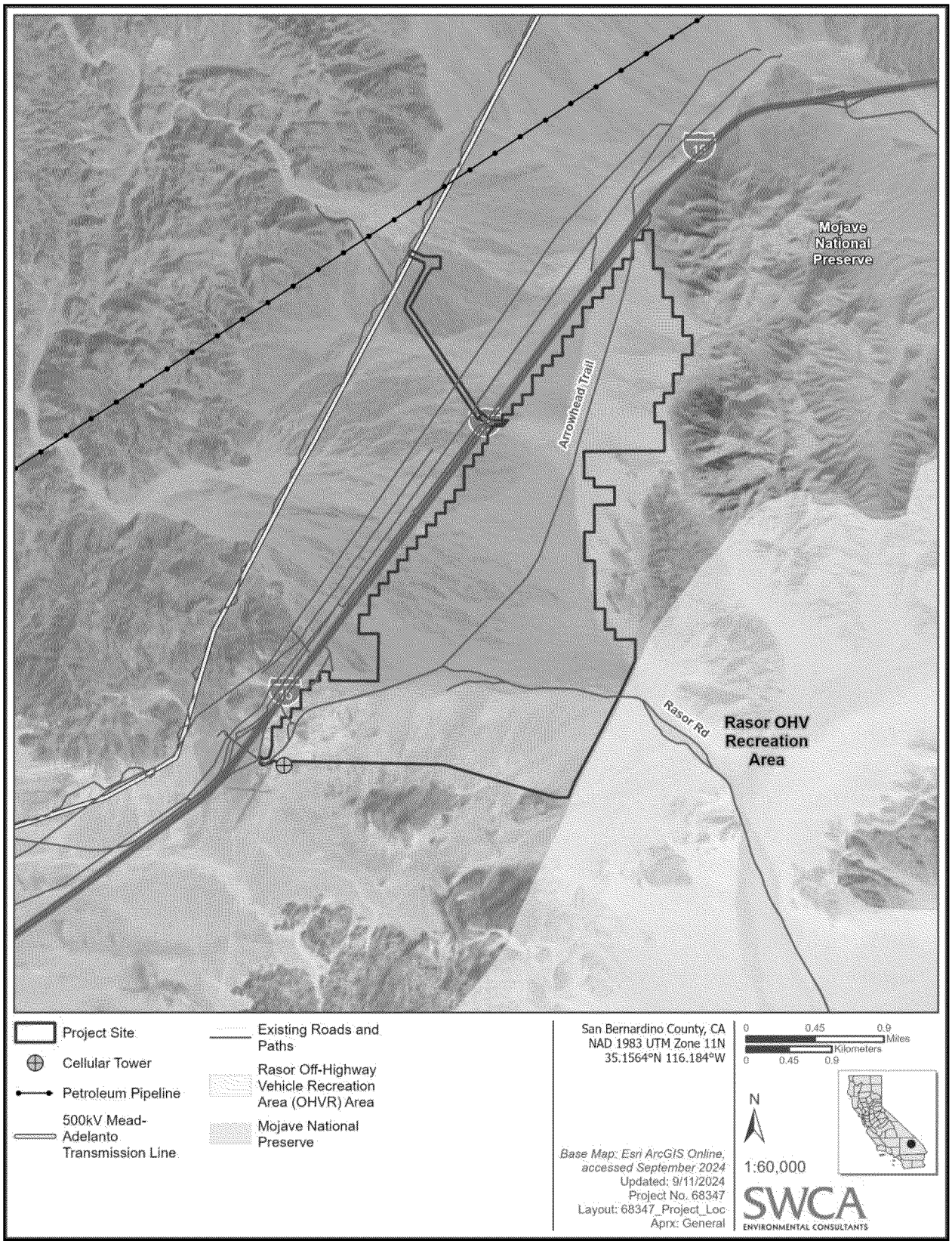


Figure 2-4. Project site location and existing conditions.



Figure 2-5. Existing view from west, facing east toward I-15 and project site.

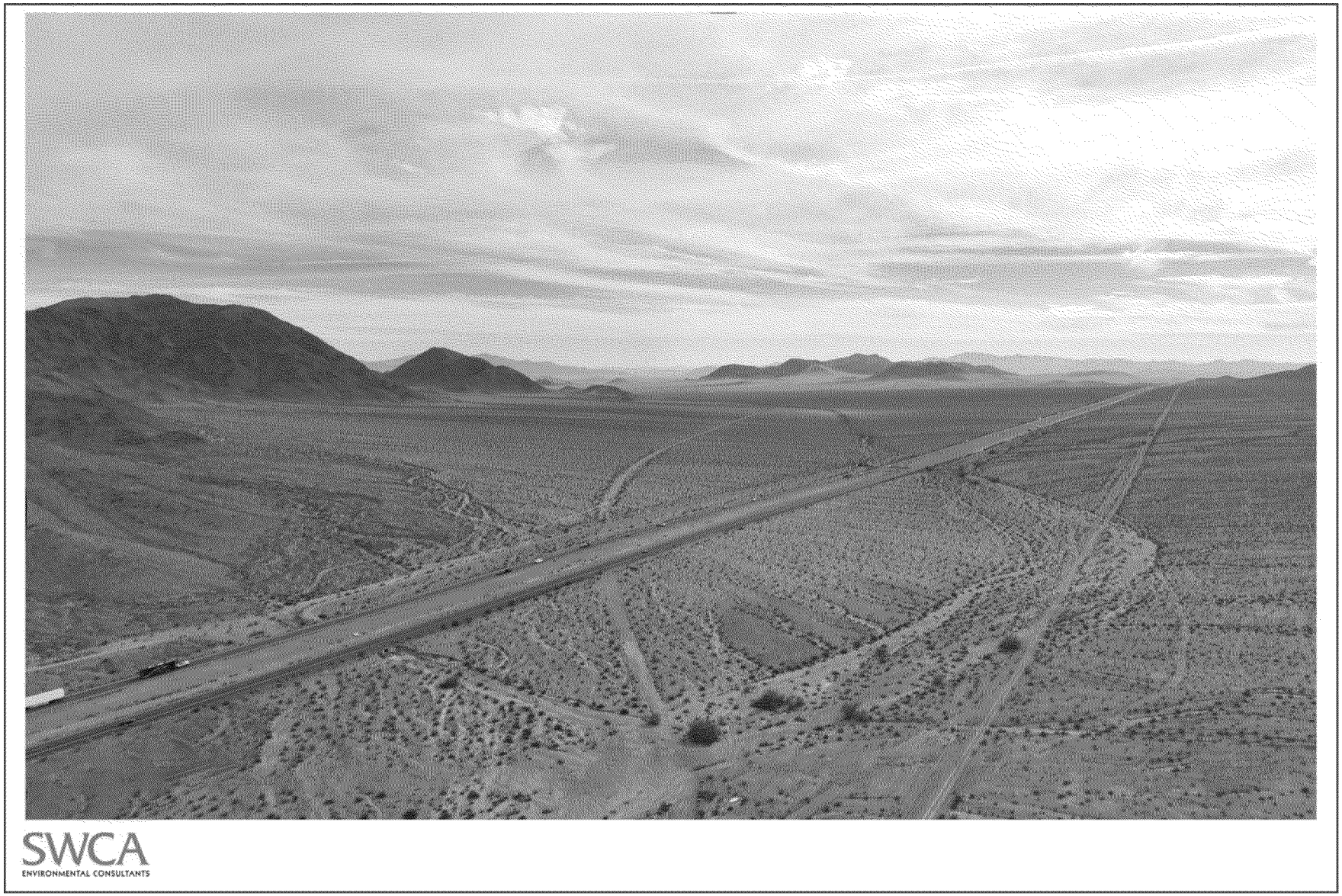


Figure 2-6. Existing view from northwest, facing east across I-15 to project site.

2.4 Generating Facility Description and Design

The project proposes to construct, operate, maintain, and decommission a proposed 300-MW PV solar facility located on approximately 2,670 acres. The approximate disturbance acreage for the project would be 2,059 acres. As shown in Figure 2-7 through Figure 2-10, the project components are as follows:

1. The solar plant site (i.e., all facilities that create a footprint in and around the field of solar panels, including the solar field consisting of solar power arrays identified as the East Array and South Arrays 1, 2, and 3), operation and maintenance (O&M) buildings and structures, stormwater infrastructure, and related infrastructure and improvements.
2. A substation and switchyard for interconnection to the existing transmission system.
3. Gen-tie line connecting project substation, switchyard, and 500-kV Mead-Adelanto line.
4. Approximately 300 MW/1,200 MWh of battery energy storage system (BESS) across 18 acres.

The project would operate 24 hours per day year-round and would generate electricity during daylight hours when the sun is shining. The project would generate and deliver solar-generated power to the regional electrical grid through an interconnection with the existing Mead-Adelanto 500-kV transmission line operated by LADWP and to the project's BESS. During final design, the configuration and number of components may vary as a result of micro-siting but all components would occur within the project footprint analyzed within this Opt-In Application.

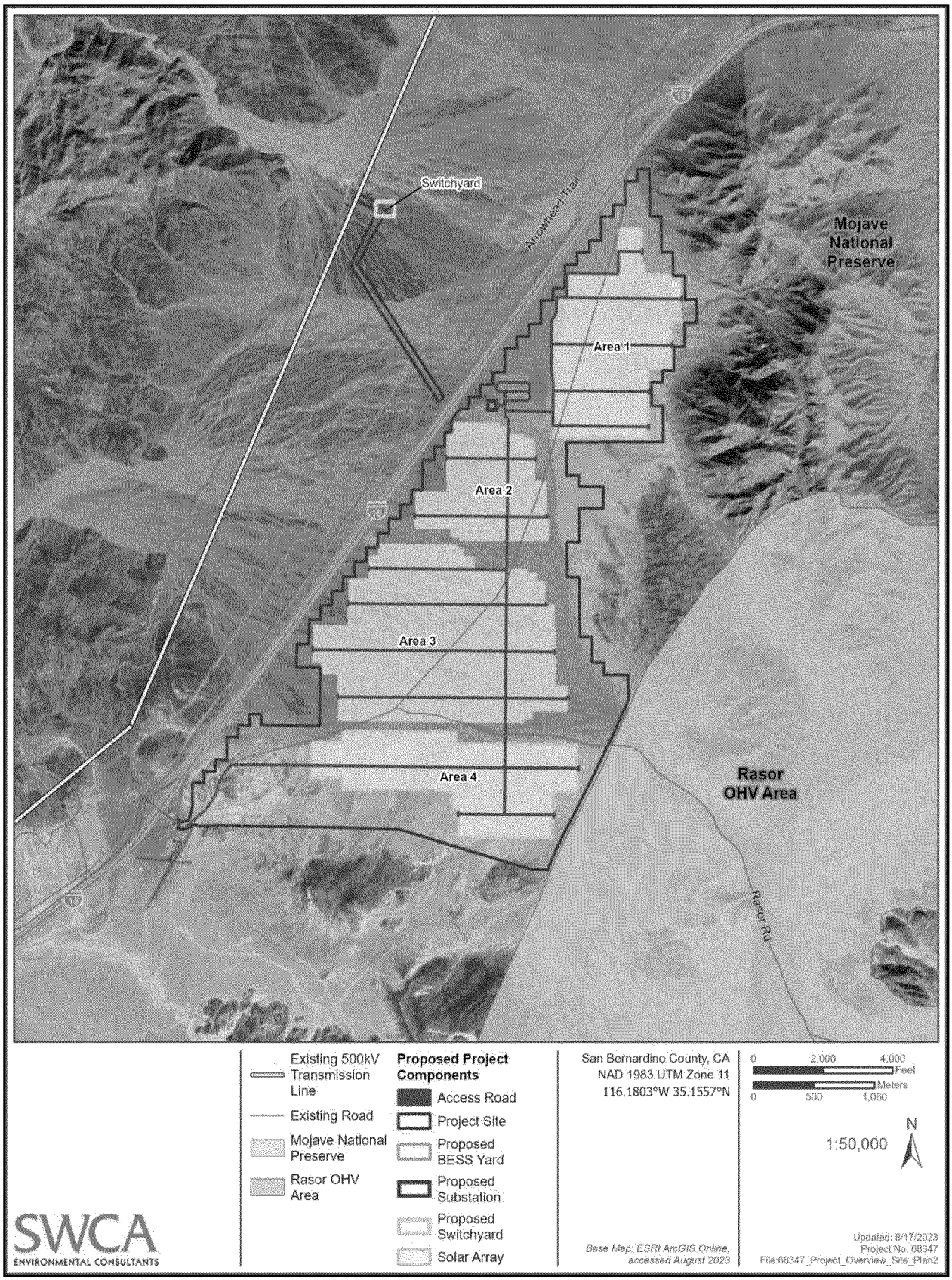


Figure 2-7. Project overview site plan.

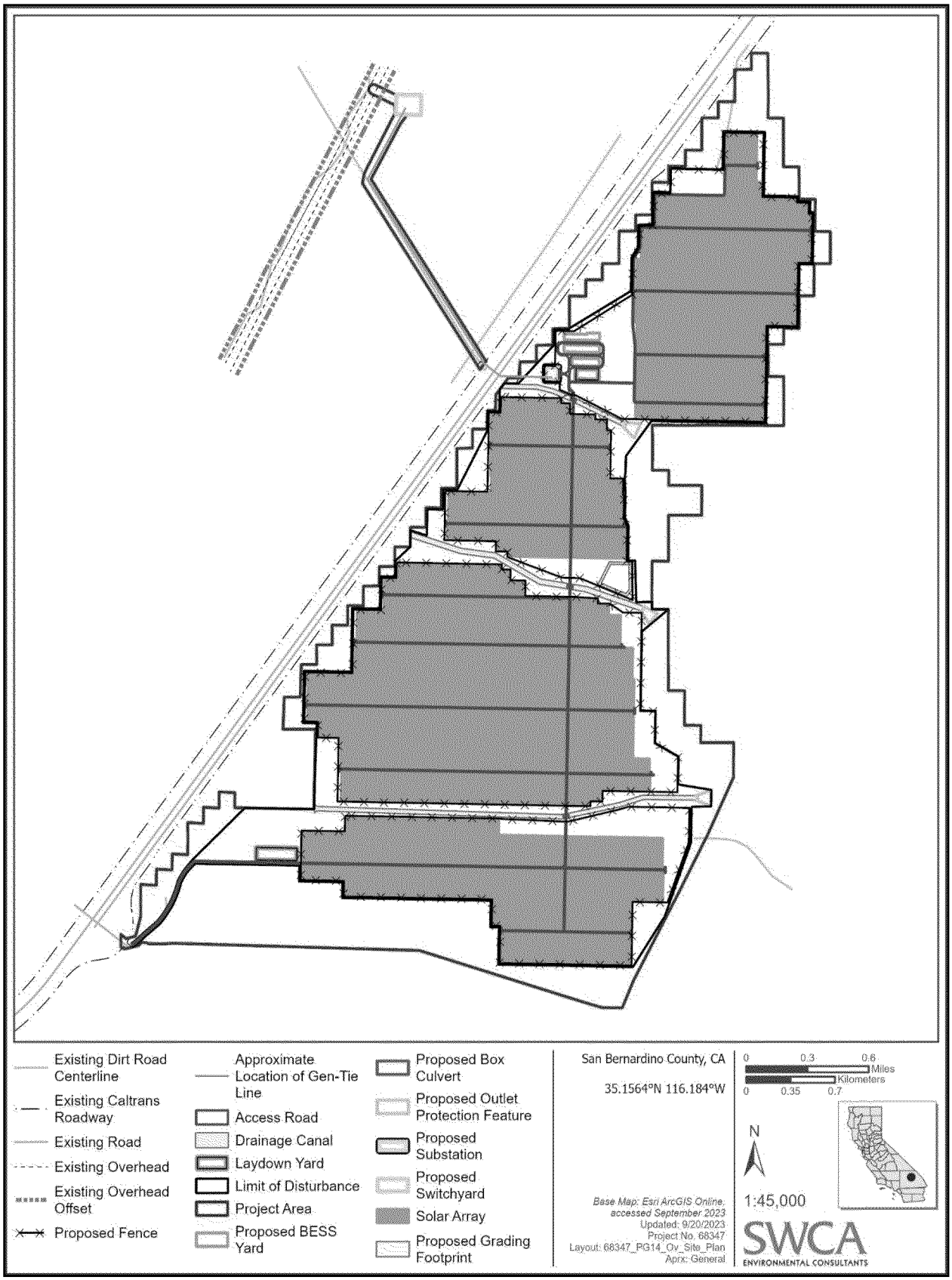


Figure 2-8. Existing and proposed conditions.



Figure 2-9. Simulated view from west looking east at I-15 and constructed project.

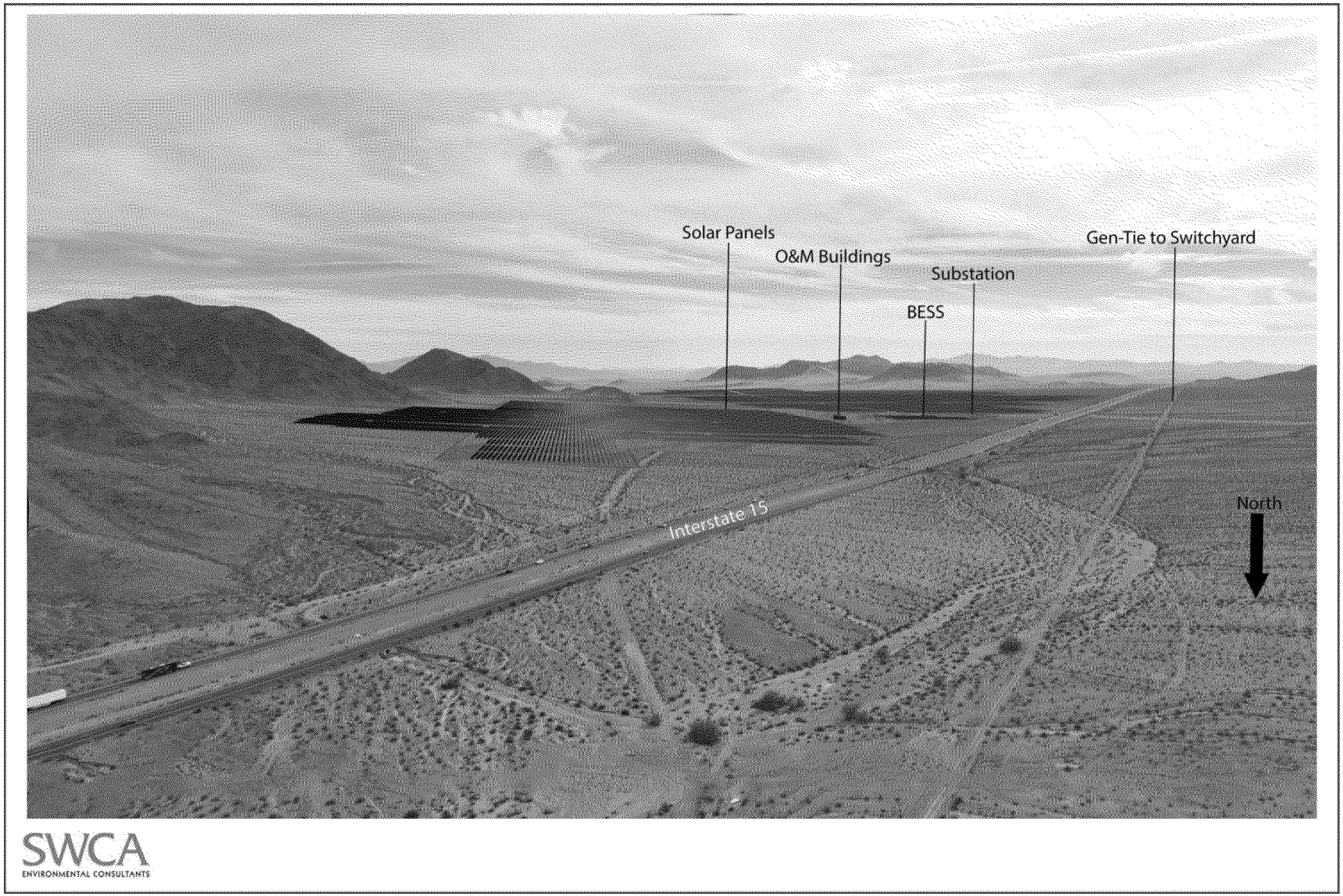


Figure 2-10. Simulated view from northwest, facing east across I-15 to project site.

2.4.1 *Solar Panel Arrays and Support Structures*

2.4.1.1 SOLAR PANEL ARRAYS

Solar cells, also called photovoltaic (PV) cells, convert sunlight directly into electricity (voltage), which is called the "PV effect." PV cells are located on panels; rows of solar panels form an array. The PV modules are uniformly dark in color, non-reflective/anti-reflective glass coating, and designed to be highly absorptive of all light that strikes their glass surfaces. Arrays are mounted onto single axis solar trackers that rotate throughout the day to increase the solar irradiance received by the solar panels. Each single axis tracker includes framing members to support the solar panels as well as bearings and a single motor with a wireless connection to a control panel responsible for moving the tracker. For the project, thousands of solar trackers would be interconnected to form a utility-scale PV system. The solar panel arrays would be organized into Area 1, Area 2, Area 3, and Area 4 on the southeast side of I-15, as shown in Figure 2-7.

2.4.1.2 SUPPORT AND MOUNTING STRUCTURES

The single-axis solar tracker would be supported by steel piles (e.g., cylindrical pipes, H-beams, helical ground screws, or similar), which would be driven into the soil using pile/vibratory/rotary driving technique. Driven pier foundations are a "concrete-free" foundation solution that would result in minimal site disturbance and facilitate site reclamation during decommissioning. Most pier foundations would be driven to approximate depths of 6 to 12 feet deep depending upon the required embedment depth. The piles would be spaced 10 to 15 feet apart. The array panels would be elevated at least 1 foot above the design flood elevation and approximately 6 to 12 feet tall, depending on site topography.

2.4.1.3 ELECTRICAL CONNECTION SYSTEM

The solar facility would be designed to be available to operate at its maximum possible output (based on meteorological conditions) at least 99 percent of the time. Availability is the duration of time that the entire plant will be able to perform its intended task. It is calculated as a ratio expressed in percentage where the numerator is the number of hours when the system as a whole is either (1) ready to charge the BESS (during idle/standby periods); (2) is charging the BESS; or (3) actively exporting electrons directly to the point of interconnection (rather than first to the BESS), all divided by the total number of hours in the period. Typically, both planned and unplanned outages are subtracted from the availability calculation numerator to calculate actual availability for a period. The availability calculation denominator can be the total amount of time in the day, week, month or, most commonly, year where availability is being calculated. For further clarity, availability is not the same as a typical generating plant's capacity factor, which accounts for annual criteria such as the plant's actual energy MWh output (numerator) versus the plant's nameplate capability to produce MWh over a full year (denominator), and which is usually based on the general assumption that the relevant plant will always operate at baseload. The solar facility is expected to have an annual and lifetime capacity factor of 20 to 40 percent.

The proposed solar-generating equipment has a proven track record of reliability based on multiple gigawatts of power plants using this technology permitted, financed, installed, and operating across North America. Power capacity would be sized to ensure full capacity output up to 50 degrees Celsius and down to -20 degrees Celsius to withstand climactic extremes. The solar facility would provide around 1,000 gigawatt hours (GWh) of electricity per year. The solar facility would operate for approximately 4,000 hours per year (daylight hours). Operation and maintenance procedures would be consistent with manufacturers and industry standard practices to maintain the useful life of the plant components.

Solar panels would be electrically connected using string wiring secured to the panel support system. String wiring terminates at PV array combiner boxes or load break disconnect boxes, which are lockable electrical boxes mounted on or near an array's support structure. Output wires from combiner boxes would be routed along an underground trench system approximately 3 to 6 feet deep and 1 to 6 feet wide, including trench and disturbed area, to the central inverter pads. Inverters are a key component of solar PV power-generating facilities because they convert the solar panel's direct current (DC) power generated by the solar panel into alternating current (AC) power and step up the voltage. The output voltage of the inverters would be stepped up to 600 to 1200V DC to 34.5kV AC power and transmitted by underground collection lines to the project substation.

2.4.2 *Substation*

The 140,000-square-foot high-voltage substation would be located adjacent to Area 1 and Area 2 on a raised gravel pad and would have a maximum height of 35 feet (see Figure 2-7 and Figure 2-8). The substation would include the main Generation Step Up (GSU) transformer, high-voltage circuit breakers, switches, meters, instrumentation transformers, relay equipment, a control enclosure, and related equipment. The substation equipment would be mounted on concrete foundations and steel structures (hot dip galvanized or weathering steel).

The substation is where all the underground 34.5-kV collection lines running from the arrays are combined and the voltage is then stepped up to 500 kV via the GSU for use with the transmission network. All interconnection equipment, including the control room, would be installed aboveground on concrete foundations and steel structures within the substation footprint. Transformers would utilize radiators with passive and active fans for airflow to dissipate heat in the substation transformers. A permanently gated, 8-foot-high chain-link fence with three-strand barbed wire meeting National Electric Safety Code requirements would be constructed around the substation.

Power to the substation control enclosure would be provided primarily by a station service transformer (roughly 50 kilovolt amps [kVA]) located within the substation yard. This transformer will be fed from the medium voltage bus within the substation yard. The control enclosure would be equipped with a backup battery and an energy management system capable of powering the control enclosure for 48 hours in the event of an outage. In the event of a prolonged outage, a secondary station service power connection will be provided via connection to the Chaves 12 KV circuit running parallel to the I-15, which is part of the SCE Kramer 220/115 kV system. Power from the 12 kV circuit will be provided via an overhead distribution line.

2.4.3 *Switchyard*

The switchyard would be set on an approximately 234,300-square-foot raised gravel pad and would have a maximum height of 100 feet. The switchyard would be located 0.8-mile northwest of I-15, adjacent to the LADWP Mead-Adelanto 500-kV transmission line ROW. The switchyard would include the High Voltage Bus Structure, high-voltage circuit breakers, switches, instrumentation transformers, relay equipment, a control enclosure, and related equipment. The switchyard equipment would be mounted on concrete foundations and steel structures (hot dip galvanized or weathering steel). A permanently gated, 8-foot-high chain-link fence with three-strand barbed wire meeting National Electric Safety Code requirements would be constructed around the switchyard.

Power to the switchyard control enclosure would be provided primarily by a station service transformer (roughly 50 kVA) located within the switchyard. To meet reliability standards, there will be two station

service transformers, primary and backup. The control enclosure would be equipped with a backup battery and an energy management system capable of powering the control enclosure for 48 hours in the event of an outage. In the event of a prolonged outage, a secondary power source will be provided via an underground connection to Kramer 115-kV sub-transmission line owned by SCE, which runs parallel to I-15.

The foundation of the substation and switchyard would include both concrete pads and concrete piers. Foundation design considerations include the area-specific geotechnical characteristics, ice and wind loading, short circuit forces, seismic forces, and more as required by industry best practices, Institute of Electrical and Electronics Engineers standards, and regional requirements. Foundation and structural design would take into consideration all seismic and flood considerations for the Project-specific location.

The switchyard was sited to minimize the gen-tie length. The revised substation location was chosen to optimize the transmission and distribution losses and capital expenditures.

2.4.4 *Gen-tie Line*

The approximately 200 foot wide, 1-mile long 500 kV gen-tie line would run from the project substation, just southeast of I-15, to the switchyard and then to the point of interconnection with the existing LADWP Mead-Adelanto transmission line. The approximately 1-mile 500-kV gen-tie line would be designed in accordance with LADWP design standards including required right-of-way (ROW) width. The gen-tie line has been sited to minimize overall distance and avoid unnecessary road and pipeline crossings, where possible. The gen-tie would be designed in accordance with LADWP design standards including required right-of-way width. The gen-tie would also use approximately eleven tubular steel pole support structures and approximately six lattice towers, all of which would be approximately 160 feet high. More or less towers and pole support structures may be required to be utilized by LADWP design standards during final design. A small segment of the gen-tie line, approximately 450 feet, would cross I-15. If this crossing segment of the gen-tie line runs underground in a bore, then on either end of this underground section there would be riser towers and transition to overhead tower structures. Alternatively, the gen-tie line may be placed overhead the I-15 rather than underground. The project includes both overhead and underground facilities which will conform to both CPUC General Order (GO) 98 and 128. CPUC GO 128 is applicable to the 34.5 kV elements of the project which are largely underground. CPUC GO 98 is applicable to the overhead electrical facilities, primarily segments of the 500 kV gen-tie that are not underground. The project will be designed in accordance with the required GO's both with respect to grounding, duct banks, derates, clearances, and soil resistivity and general conditions.

2.4.5 *Transmission System*

The project does not require the need to construct any new or additional electrical transmission system components off-site. Existing infrastructure surrounding the site includes two high-voltage electric transmission lines, an electrical distribution line, wireless cellular telephone towers, two fiber-optic cables, and two fuel pipelines. The two high voltage electrical transmission lines to the west of I-15 are a 115-kV subtransmission line owned by Southern California Edison and the Mead-Adelanto 500-kV transmission line operated by LADWP. The project would interconnect into and bisect the LADWP's 500-kV Marketplace-Adelanto Transmission Line 1 as the primary POI, which has ample unused capacity therefore eliminating the need for new transmission lines to be constructed off-site. The project would interconnect at the 500 kV level due to the size of the project. The 500 kV gen-tie line has been sited to minimize overall distance and avoid unnecessary road and pipeline crossings, where possible.

2.4.6 *Battery Energy Storage System (BESS)*

A BESS absorbs, holds, and then reinjects energy from the PV system into the electrical grid. The project is anticipated to include up to 300 MW/1200 MWh of energy for dispatch into the local electrical grid via the same point of interconnection as the solar arrays. The BESS would be located adjacent to the substation and Area 1. Eighteen acres of the project site would be utilized for the BESS throughout the project site at full buildout.

2.4.6.1 BATTERIES

Individual lithium-ion or similar cells form the core of the BESS and are assembled in sealed battery modules. The battery modules would be installed in self-supporting racks electrically connected either in series or parallel to each other. The operating rack-level DC voltage currently ranges between 700 and 1,500 volts (V). The individual battery racks are connected in series or a parallel configuration to deliver the BESS energy and power rating.

2.4.6.2 BATTERY ENERGY STORAGE SYSTEM ENCLOSURE AND CONTROLLER

The BESS containers would house the batteries described above, as well as the BESS unit controllers. There would also be a BESS Site Energy Management System controller, located in a pad mount enclosure within the BESS yard. The BESS site controller is a multilevel control system for the battery modules, power conversion system, medium-voltage system, and takes commands from the Plant SCADA controller which regulates overall plan output. The controllers ensure that the BESS effectively mimics conventional turbine generators when responding to grid emergency conditions. The BESS enclosure would also house required heating, ventilation, and air conditioning (HVAC) and fire protection systems. The battery storage containers would be built using standard International Organization for Standardization (ISO) shipping containers, and each would measure approximately 20 feet in length, 6 feet in width, and 8 feet in height, although other smaller form-factor structures exist that may be used.

The safety system would include a fire detection, alarm, and suppression control system that would be triggered automatically when the system senses imminent fire danger. A fire suppression control system would be provided within each on-site battery enclosure. The safety system would use either a waterless evaporating fluid, a sustainable clean agent (not a hydrofluorocarbon clean agent), or an alternative suppression agent, such as an inert gas. The control system would also notify the project operators and could be configured to notify local first responders as well.

2.4.7 *Operation and Maintenance Area Facilities*

2.4.7.1 BUILDINGS

Three buildings related to operations, maintenance, and storage would be constructed as part of the project. One building would be 2,400 square feet, and the other two buildings would each be 5,000 square feet in area. All buildings would be painted BLM color scheme Sudan Brown. These buildings would be in the northwest portion of the site next to the BESS facilities. All of these facilities would be monitored by on-site O&M personnel and/or remotely.

The project would power the O&M buildings via a 480-V circuit from the BESS Auxiliary Power distribution system. This circuit will be fed from the collector substation and transformed to 480 volts via an auxiliary transformer mounted at the BESS yard. Power will be distributed via 480-V switchgear at the BESS yard. Power distribution will be via underground cables. Backup power to the O&M facilities would be via a local microgrid. This system would consist of solar PV panels mounted to the roof of the O&M buildings, a backup battery providing 24 hours of standby power, and an automatic transfer switch. This connection removes the need to have an emergency generator as part of the proposed project.

2.4.7.2 PARKING AREAS

A 13,200-square-foot parking area would be located adjacent to the buildings described above, in the southwest corner of the site. They would be composed of compacted soil covered with filter fabric and 4-12" of compacted Class II aggregate base. The parking areas are not expected to exceed approximately 0.33 acre, or 13,200 square feet. Parking would be provided for the anticipated employees during project operation, for visitors, and for other equipment anticipated to be on-site at any time.

2.4.7.3 ACCESS ROADS

Primary operational access to the project site would be provided via the existing Rasor Road, that runs from I-15 eastward to the Rasor OHV recreation area (Figure 2-11). The portion of Rasor Road on BLM land would serve as the entrance and primary access road within the site and is approximately 0.4-mile in length. The project would improve, maintain and slightly re-route in places this portion of Rasor Road up to 26 feet wide and minor improvements will be made within both Caltrans and San Bernardino County right-of-way to improve the road conditions so that heavy trucks can utilize the route.

Rasor Road will be permanently open to the public during both project construction and operation. In order to allow public access to the Rasor OHV recreation area. Rasor Road would continue to serve as the main access point for the public into the Rasor OHV recreation area. During project construction and operation, the public would access the Rasor OHV area by traveling through the on-site portion of Rasor Road that has been improved, maintained and aligned to avoid solar panels throughout the project site. Rasor Road would be located between Array 3 and Array 4 and would continue to allow public access to the Rasor OHV recreation area. The solar arrays would be fenced and gated to ensure no public access to the project facilities.

Currently, Arrowhead Trail splits off of Rasor Road and runs north-south. During project construction and operation, Arrowhead Trail would be closed permanently. The project would construct internal access road(s) which lead to the substation and BESS and between the solar arrays. These internal access roads would be up to 26 feet wide and include a 50-foot turning radius at the project boundary.

Northwest of I-15, the project would use an existing travel route (CL 8847 and CL7682 from Zzyzx Road). CL 8847 and CL7682 are existing roadways that are publicly accessible. These roadways would not require any improvements during project construction or operation. As an alternative, the project may also construct and use a new temporary exit off southbound I-15 near the gen-tie corridor to access the gen-tie line corridor and switchyard.

All new on-site access roads would consist of compacted native material and would be graded as necessary but would generally follow the existing terrain covered with filter fabric and 4 to 12 inches of compacted Class II aggregate or amended with Class II aggregate only where native soils are not suitable for heavy traffic. Larger boulders that could impede vehicle access would be removed. These permanent access roads would be compacted to meet load requirements for vehicle traffic over the life of the project.

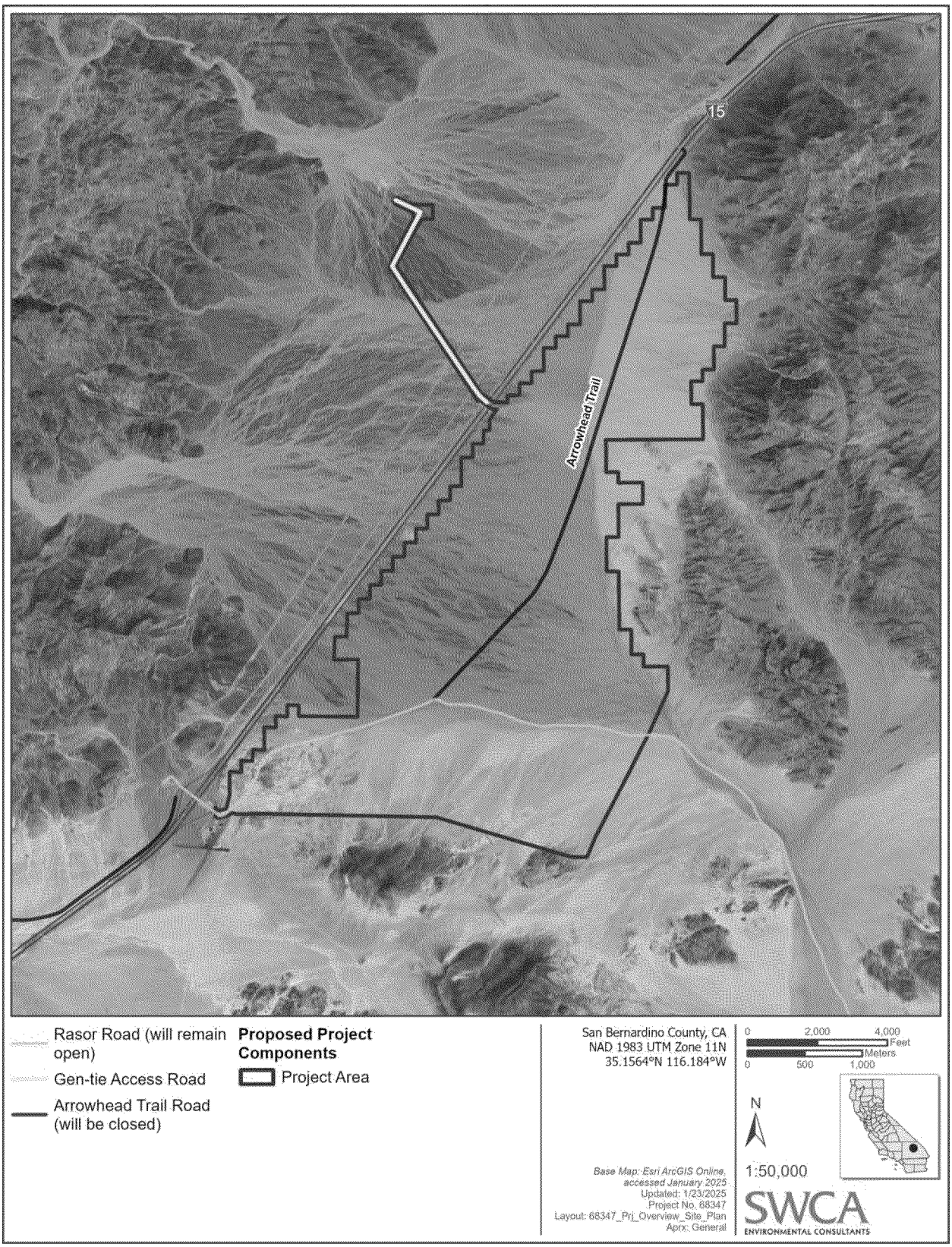


Figure 2-11. Existing and proposed roadways.

2.4.7.4 SITE SECURITY AND FENCING

All project components would be surrounded by warning signage, perimeter security fencing, desert tortoise exclusionary fencing, and perimeter security cameras. Combined security and desert tortoise fencing would be installed surrounding each individual array field and extend to include the substation and BESS area. A permanently gated, 8-foot-high chain-link fence with three-strand barbed wire meeting National Electric Safety Code requirements would be constructed around the substation and the switchyard. The line posts and terminal posts of the fence would be buried up to 3.5 feet deep, and the distance between posts would be approximately 10 feet. All permanent tortoise exclusionary fencing would be constructed in accordance with Chapter 8, Desert Tortoise Exclusion Fence, of the USFWS's 2009 Desert Tortoise Field Manual (USFWS 2009).

2.4.7.5 LIGHTING

During construction, lighting would be strategically located for safety and security in the construction trailer staging area, parking area, and around site security facilities. Lighting would be located on temporary service poles. Power for the lights would come from the proposed distribution line or construction office trailer generator. Lighting is not planned for construction activities; however, if required, it would be limited to the locations and amounts needed to ensure safety. It would be focused downward, shielded, and directed toward the interior of the site to minimize light exposure to areas outside the construction area.

During operation and maintenance, lighting would be provided at the Rasor Road site entrance, O&M buildings, substation, and switchyard. Some portable lighting also could be required for essential nighttime maintenance activities or troubleshooting in the event of an outage event. All lighting would be kept to the minimum required for safety and security; sensors, motion detectors, and switches would be used to keep lighting turned off when not required. All lights would be hooded and directed to minimize backscatter and off- site light. All lighting would be compliant with San Bernardino County Dark Skies Ordinance.

During site closure and decommissioning, safety and security lighting would be provided using a combination of the installed lighting system and portable lighting, if required. As with the other project phases, lighting would be focused downward, shielded, and directed so as to minimize light exposure to areas outside the work area.

2.4.8 *Landscaping*

The project would plant a variety of native and drought tolerant trees and shrubs along the western boundary of the project site. There would be approximately 30 acres of landscaped areas on-site, including up to 5 acres of irrigated landscaped areas. Irrigation would occur as needed.

The Applicant would maintain existing native vegetation to the extent possible. However, project construction may require that existing desert scrub vegetation be removed from portions of the project area. Additional acreage would be cleared of vegetation to allow for installation of buildings, the substation, access roads, fencing, and collector lines. Surface treatments, such as grading, disking, or mowing, can create potential habitat for non-native or invasive species that infiltrate the area. The Applicant has prepared Pesticide Use Proposals (PUPs) and an Integrated Weed Management Plan (IWMP) to minimize impacts from pesticides and invasive weeds.

2.4.9 *Drainage and Erosion Control*

Grading of up to 2,059 acres and other types of ground treatment would be conducted outside of existing major drainage channels and would not involve substantial changes to site topography. Once construction is complete, the topography beneath the solar panels would generally be the same as the baseline condition except in areas where soil has been compacted or rocks and isolated surface undulations have been removed by grading. Native vegetation would be allowed to reestablish naturally and would be trimmed during operation as necessary.

Security fencing would not be used in the major drainage channels in between the array fields to minimize impacts to wildlife corridors and stormwater flow. If needed along larger drainages, breakaway fencing would consist of a driven post with detachable connections just above ground level, which allow the fencing to yield to the force of a storm event without damage to the embedded portion of the post. Following such an event, the fence would be reattached to the post. The entrance to each access road along the perimeter would include a security gate.

The design of the array fields would avoid placing solar panels within the stormwater flow corridors downstream of the existing culverts under I-15 so that flows from the culverts would continue to follow existing braided flow channels. Three drainage channels would be constructed between the array fields. Each channel would be approximately 3 feet below grade and vary in width and length. Approximately ten temporary sediment basins of varying sizes and depths would be constructed adjacent to the drainage channels and throughout the site and removed at the conclusion of construction.

Development within the channels would be limited to access road crossings and potential subsurface collector lines. Approximately twelve box culverts and eight low-water crossings would be installed at the intersection of access roads and drainage channels, and permanent protection berms would be constructed along the edges of the arrays near these flow corridors to prevent occasional side channel flows from entering the array fields. Temporary and permanent fiber rolls would also be installed on slopes before they transition into steeper slopes to control runoff. All fiber rolls would be made of natural materials and weed free.

2.4.10 *Solid Waste and Hazardous Materials Management*

Construction would generate solid waste. As part of the project, a Waste Management Plan has been completed. A full-time crew would be responsible for maintaining site cleanliness during construction, including collecting trash at the temporary construction facility and the various work fronts. All trash would be placed in containers with secure lids. All hazardous and non-hazardous waste would be stored in appropriate containers for off-site disposal. All waste generated during construction would be stored in wind-proof and wildlife-proof containers that periodically would be transported to an off-site disposal facility authorized to accept the waste. During construction, portable sanitary facilities would be located in the project area and maintained by a local contractor.

During operations and maintenance, some PV panels would require replacement due to breakage or other damage or to take advantage of new technologies or address degradation of electrical capacity. Removed PV panels would be recycled or disposed of in accordance with applicable local, state, and federal standards and regulations.

Hazardous materials that may be used and stored during construction and/or operations and maintenance could include gasoline and diesel fuel, paints, thinners, solvents, sealants, lubricants, hydraulic fluids, herbicides. Facility transformers would contain non-polychlorinated biphenyl (PCB)-rated dielectric fluid. Due to the non-hazardous nature of these transformer fluids, secondary containment is not required.

Facility breakers may contain SF6 gas insulating fluid depending on final design but will comply with California Air Resources Board regulations. The Waste Management Plan outlines the nonhazardous and hazardous waste streams associated with construction and operation of the project. The Waste Management Plan also identifies the waste disposal sites that may be feasibly used for disposal, including name, location, classification, daily and annual permitted capacity, daily or annual amounts of waste currently being accepted, estimated closure dates and remaining capacity and a description of any enforcement action taken by local or state agencies due to waste disposal activities.

Hazardous materials would be stored within secondary containment to control any potential leaks of oils, grease, fuels, and other hazardous materials stored at the project site. All potential contaminants would be stored and used at least 50 feet from any defined or constructed channels or basins at all times. If quantities exceed regulatory thresholds, a spill prevention control and countermeasure (SPCC) plan would be developed prior to project construction in accordance with applicable regulations and would include a facility diagram that would identify the location and contents of hazardous materials containers; potential equipment failures; containment and diversionary structures; facility drainage; personnel, training, and spill prevention procedures; and emergency contact information. Diversionary structures meeting the requirements of the SPCC plan would be provided for oil-containing equipment, including transformers, at the project site. Transformers would be inspected on a regular basis to detect and respond to any leakage.

All use, storage, transport, and disposal of hazardous materials associated with the project would be done in strict accordance with federal, state, and local regulations and guidelines. Employees would be trained in the appropriate protocol for notification and cleanup of hazardous materials. Additionally, the site would be supplied with adequate spill containment kits and personal protective equipment in case of a release. Construction equipment and maintenance trucks would be maintained at all times to minimize leaks of motor oils, hydraulic fluids, and fuels. No extremely hazardous materials would be produced, used, stored, or disposed of as a result of the project.

Most of the fuel required by construction and operation staff vehicles and engines would be procured at commercial gas stations in the local area, such as at the service station at Rasor Road or in Baker. A limited amount of #2 diesel and gasoline petroleum fuels (approximately 500 gallons each) may be stored in the staging areas in above grade steel tanks with secondary containment. In addition, every transformer in the substation would have concrete oil containment. In the case that a leak occurs or a transformer fails, oil containment would be made to capture and store oil from transformers. The purpose of containment would be to keep transformer oil out of the ground. Material Safety Data Sheets for the hazardous materials that are expected to be used and/or stored on-site would be retained at the on-site office.

2.5 Construction Activities

The following sections provide details about the timeline and process for construction of the project. Once construction is complete, the project would operate for approximately 40 years. Construction would begin in the second quarter of 2026, and initial operation would begin in the fourth quarter of 2027. Full-scale commercial operation is anticipated to begin by the second quarter of 2028.

2.5.1 *Construction Schedule and Workforce*

Construction of the project is anticipated to begin in the second quarter of 2026 and occur over an approximately 18-month period and consist of overlapping construction stages. Stage 1 would include

mobilization, site preparation as required, grading as required, fencing, preparation of roads and laydown areas, and installation of measures in the Stormwater Pollution Prevention Plan (SWPPP) as well as erosion control features. Stage 2 would include installation of solar array structural components including piles, racking systems, and foundations. Stage 3 would include installation and makeup of electrical equipment including trenching to install cables and installation of the solar and BESS inverters, solar panels, battery storage systems, gen-tie, switchyard and ancillary equipment, and would also include trenching activities to install cables and other electrical equipment. Stage 4 would include inspections, testing, and commissioning. The approximate duration of the states is as follows: Stage 1 would be from months 1 to 8, Stage 2 would be from months 4 to 12, Stage 3 would occur during months 10 to 16, and Stage 4 would occur during months 15 to 18. An average of 200 construction workers would operate daily on-site, with an anticipated 300 construction workers during peak construction activities.

The typical construction work schedule is expected to be from 6:00 a.m. to 6:00 p.m., Monday through Friday. However, to meet schedule demands or to reduce impacts, it may be necessary to work early mornings, evenings, or on weekends during certain construction phases. The work schedule may be modified throughout the year to account for changing weather conditions (e.g., starting the workday earlier in the summer months to avoid work during the hottest part of the day for health and safety reasons). If construction work takes place outside these typical hours, activities would comply with San Bernardino County standards for construction noise levels. For safety reasons, certain construction tasks, including final electrical terminations, must be performed after dark when no energy is being produced. The project would use restricted nighttime task lighting during construction. Lighting would include only what is needed to provide a safe workplace, and lights would be focused downward, shielded, and directed toward the interior of the site to minimize light exposure outside the construction area.

2.5.2 *Preconstruction Activities (Stage 1)*

Prior to construction, all contractors, subcontractors, and other on-site personnel would receive Worker Environmental Awareness Program (WEAP) training regarding the appropriate work practices necessary to effectively understand and implement the biological commitments in the project description, implement the mitigation measures, comply with applicable environmental laws and regulations, avoid and minimize impacts, and understand the importance of these resources and the purpose and necessity of protecting them.

Qualified biologists would conduct preconstruction surveys for sensitive species. Sensitive resource areas would be flagged so they are avoided or appropriately managed during construction. Preconstruction field survey work would include identifying precise locations of the project site boundary and desert tortoise and security fencing. Construction staging areas would be established for storing materials, construction equipment, and vehicles. These features would be subsequently staked in the field. No paint or permanent discoloring agents would be applied to rocks or vegetation to indicate survey or construction limits. All off-road construction vehicle travel, fence installation, and staging area establishment would be surveyed and/or monitored by qualified biologists, archaeologists, and tribal monitors, as appropriate. The preconstruction field surveys would be conducted during daylight hours, and vary in length and timing, depending on the species found on-site. The proposed WEAP training would be required before a worker would be allowed to work on the site. These trainings would also occur on a continuous basis during construction. Onsite water wells would be drilled during Stage 1.

2.5.3 *Site Preparation (Stage 1)*

As shown in Figure 2-12, approximately 2,059 acres throughout the site would be disturbed. Grubbing and grading would be required at roads, laydown areas, BESS yard, substation yard, and switchyard to level rough or undulating areas, including around roads and laydown areas, as well as the BESS yard,

substation yard, and switchyard. Grubbing and grading would also be required to prepare soils for concrete foundations for substation equipment, inverters, energy storage systems, and the operations and maintenance buildings. Grubbing would involve the removal of vegetation from the construction site, while grading would include earthwork to achieve a certain base or slope. Mowing, minimal grubbing, and grading may also be required in the array areas to prepare the site to receive pile foundations. There would be approximately 630,000 cubic yards of cut and 180,100 cubic yards of fill, thus requiring approximately 449,900 cubic yards of cut on-site. The 449,900 cubic yards of net cut would be distributed throughout the project disturbed area.

Per Mojave Desert Air Quality Management District Rule 403, as part of project construction, the applicant would develop a Dust Control Plan that describes all applicable dust control measures to address construction-related dust (Mojave Desert Air Quality Management District 2020). Further, a SWPPP or SWPPP-equivalent document required by the Lahontan Regional Water Quality Control Board (RWQCB) would be prepared by a qualified engineer or erosion control specialist and would be implemented before construction. The SWPPP would be designed to reduce potential impacts related to erosion and surface water quality during construction activities and throughout the life of the project. It would include project information and best management practices (BMPs). The BMPs would include dewatering procedures, stormwater runoff quality control measures, concrete waste management, stormwater detention, watering for dust control, and construction of perimeter silt fences, as needed.

2.5.4 *Solar Array Assembly and Construction (Stage 2)*

Construction of the solar arrays would begin with the installation of array support posts, which would be driven into the soil using a pile/vibratory/rotary driving technique to a depth of approximately 6 to 12 feet. Single-axis solar tracking structures would be fastened to the support piles. Once the support structures are in place, solar panels would be attached to the support frame. The assembled groups of solar panels would be wired together into strings through connectors on the back of the modules. Assembled panel sections would then be connected to combiner boxes located throughout the arrays that would deliver power to the inverter. Output wires from combiner boxes would be routed along an underground trench system approximately 3 to 6 feet deep and 1 to 6 feet wide, to the central inverter skid. Central inverters would be mounted on concrete pads or driven piles. Central inverters would be brought in by tractor-trailers through the Rasor Road site entrance and delivered directly to the mounting pad sites where they are placed by mobile crane.

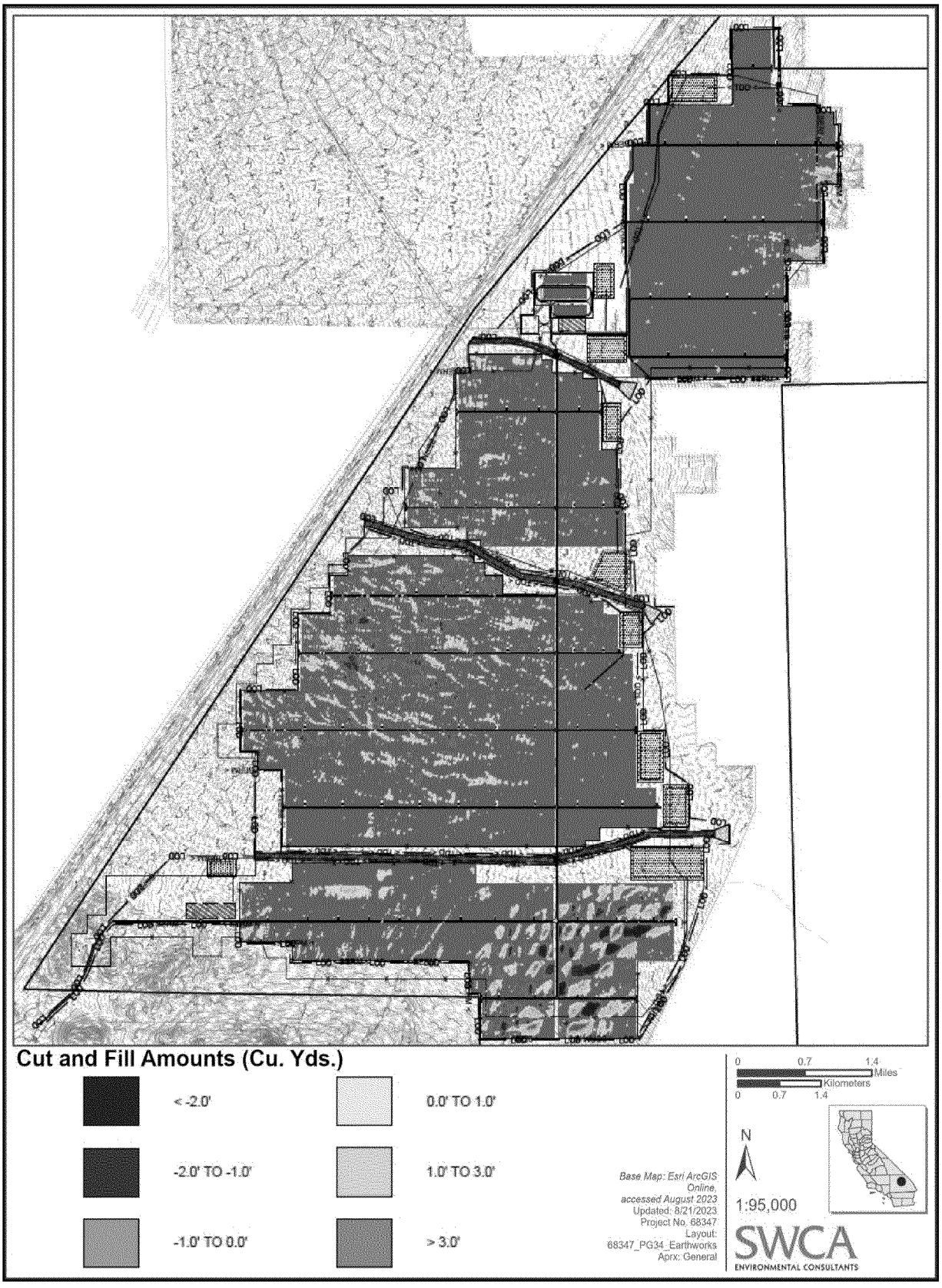


Figure 2-12. Proposed earthwork.

2.5.5 *Substation, Switchyard, and Gen-tie Construction (Stage 3)*

Construction of the project substation, switchyard, gen-tie and interconnection to the Mead-Adelanto 500-kV transmission line would occur concurrently with the construction of the solar arrays. To construct the 500kV transmission line connection from the project switchyard to the existing Mead-Adelanto line, approximately, one tower would be removed from the existing line, and multiple new tower structures would be constructed adjacent to the removed tower. The new towers would carry the 500-kV transmission line into and out of the new switchyard. The sequence of construction would be to install the new towers and equipment, string the new line, then request and outage to cut in the new line to the existing Mead-Adelanto line.

The project gen-tie line from the switching station to the project substation would be installed using concrete caisson foundations or driven poles. Upon installation of all poles, the line insulators and switches would be installed. Upon installation of all line equipment, the conductors would be strung along the poles.

The substation and switchyard would be graded and compacted to an approximately level grade and raised above the adjacent grade to prevent flooding. Upon completion of the raised pad, concrete foundations and underground cabling, and a grounding grid would be installed including a grounding grid as required by the project design and applicable standards. Upon completion of the underground work, steel structures would be installed to mount equipment. Upon completion of the structures, substation equipment would be installed including transformers, switches, breakers, and control enclosures. Upon completion of equipment installation wiring and terminations at all equipment will be performed. Upon completion of all wiring, testing of equipment will be performed.

The approximately 1-mile 500-kV gen-tie line would be designed in accordance with LADWP design standards including required right-of-way (ROW) width. The gen-tie would also use approximately eleven tubular steel pole support structures and approximately six lattice towers, all of which would be approximately 160 feet high. More or less towers may be required to be constructed in compliance with LADWP design standards, during final engineering. A small segment of the gen-tie line, approximately 450 feet, would cross I-15 in an underground bore, and on either end of this underground section there would be riser towers and transition to overhead tower structures. Alternatively, the gen-tie may cross I-15 overhead, rather than underground.

2.5.6 *Electrical Construction Activities (Stage 3)*

Buried electrical lines for DC array wiring and AC wiring between inverters and transformers would then be installed using trenching machines. The trenches would be approximately 3 to 6 feet deep and 1 to 6 feet wide. The trenched areas would be backfilled and compacted after the cables are laid into place It is anticipated that the solar panels would require one washing during the construction phase prior to energizing and performance testing of the arrays in order to remove the dust that has accumulated on the panels during construction.

The medium-voltage collection cables would be trenched at depths up to 4 to 8 feet using a trenching machine. The trenches would be approximately 12 to 36 inches wide. Multiple trenches may be placed adjacent to each other, depending on the number of collector circuits in a particular location. The cables would be placed within the trenches in layers (as necessary) followed by backfill and compaction operation. Alternatively, a single pass trenching and cable installation machine could be used to automate the cable placement and backfill process. The main trenching operations would be for installation of DC

cables from the combiner boxes to the inverter skids and installation of AC collector circuits between inverter skids and the substation. The collector cable would be installed by circuit in conduits, with each circuit contained in a single 6-inch-diameter conduit (typical) spaced approximately 10 feet on center. The exact locations would be determined during detailed design.

2.5.7 *Construction Equipment and Materials*

Standard construction equipment would be used during construction, including earth-moving equipment (e.g., bulldozers, excavators, backhoes) and road-building equipment (e.g., compactors, scrapers, graders). Construction equipment would include air compressors, all-terrain passenger vehicles, backhoes, cranes, a drill rig, tractor-trailers, flat-bed trucks, telehandlers, pick-up trucks, pile drivers, trenchers, portable generators, and water trucks. Construction equipment and maintenance trucks would be maintained at all times to minimize leaks of motor oils, hydraulic fluids, and fuels. No extremely hazardous materials are currently anticipated to be produced, used, stored, or disposed of as a result of the project.

Most of the fuel required by construction and operation staff vehicles and engines would be procured at commercial gas stations in the local area, such as at the service station at Rasor Road or in Baker. A limited amount of #2 diesel and gasoline petroleum fuels (approximately 500 gallons each) would be stored in the staging areas in above-grade steel tanks with secondary containment.

Concrete would be required for building or structure footings and foundations and pads for inverters, transformers, water tank footings, and substation equipment. In areas where driven support posts are not practical for the solar arrays, pre-drilling and installation of posts with sand slurry may be used.

2.5.8 *Construction Vehicle Access and Traffic*

A Construction Traffic Control Management Plan has been prepared for the Project. All construction materials would be delivered by truck. Most truck traffic would occur on designated truck routes and major streets. Construction traffic would include periodic truck deliveries of materials and supplies, equipment, recyclables, trash, and other truck shipments, as well as construction worker commuting vehicles. Most construction equipment and vehicles would be brought to the site at the beginning of each construction phase during construction mobilization and remain on-site throughout the duration of the construction phase for which they were needed. Generally, the equipment and vehicles would not be driven on public roads while in use for the project. Equipment will be brought to site on trailers with permitted load as required by Caltrans.

The project is anticipated to generate a maximum of 600 daily vehicle trips from construction workers, 200 daily vehicle trips from heavy duty trucks and 34 daily vehicle trips from water trucks. The project would use a just-in-time delivery system with supplies and components delivered on a schedule to minimize on-site storage needs.

2.5.9 *Construction Water Supply and Use*

Project construction would take place over approximately 18 months. Water would be needed primarily for dust control and soil compaction during the first 90 days of grading activities, with small amounts used for sanitary and other purposes. The water for the project would be supplied from up to five newly constructed onsite groundwater wells or, alternatively or in addition, from an existing private offsite groundwater well. If the offsite source is used, this water would be trucked in from this well and stored in three permanent water storage tanks to support project operations. The existing offsite water well that

would be utilized is located at 58502 Death Valley Road, Baker, California 92309, approximately 11 miles northeast of the project site.

During Stage 1 and Stage 2 of construction, which includes the 90-day grading period, the project would require approximately 200,000 gpd, or approximately 336 acre-feet per year (af/yr). Water requirements in the second year of construction are expected to be less than 110 af/yr, or half of the requirement of the first year of construction.

Five temporary water tanks of 100,000 gallons would be brought on-site by truck to store water in anticipation of construction water needs. The tanks would be housed on trailers located along access roads or within areas that have been cleared for installation of project components. The tanks may be moved around the site as construction progresses and would be used to fill on-site water trucks. The temporary water storage tanks would be removed after construction. Water used for construction would be supplied from up to five newly-constructed onsite groundwater wells or, alternatively or in addition, from an existing offsite groundwater well.

2.6 Operation and Maintenance

The project would begin operation in 2027 and operate 7 days a week, 365 days a year, with an approximately 40-year anticipated lifespan. Operational needs at the site include monitoring and optimizing the power generated by the solar arrays and interconnection with the transmission lines, operating the Supervisory Control and Data Acquisition (SCADA) system, troubleshooting the collector lines and repairing damaged cables, connections, or equipment, performing preventative maintenance per manufacturer recommendations, and conducting panel-washing activities periodically through the year. Additional maintenance would be required to maintain the administrative buildings, fencing and signage, roadways, and other ancillary facilities at the site. The project will hire local workforce as available to perform operations and maintenance.

2.6.1 *Operation and Maintenance Workforce*

The project substation would be uncrewed during operation; however, a workforce of approximately 2 to 4 personnel would visit the substation on an as needed basis for maintenance, equipment operation, and/or security. The project would be remotely controlled, eliminating the need for permanent on-site employees. Final staffing levels and configuration would be based on the final site configuration and early operating and maintenance experience. The facility would not be accessible to the public, and access will be infrequent and limited to authorized personnel.

2.6.2 *Automated Facility Control and Monitoring System*

The project would be operated and monitored by means of a SCADA system located in the control building. Sensors located at each inverter, BESS, project weather station, project switches, and breakers would report operational parameters. Data access and the project PV and BESS systems would be controlled, either on-site or remotely, through a high-security system. The non-conductive fiber-optic communications cable would be co-located with the low-voltage DC and AC wiring to reduce environmental impacts. Personnel communication would use two-way radio/receptor stations, which would require a Federal Communications Commission (FCC) license.

2.6.3 *Operational Water Supply and Use*

Project operation would require water for potable use, dust control, panel washing, and fire protection. The water for the project would be supplied from up to five newly constructed onsite groundwater wells or, alternatively or in addition, from an existing private offsite groundwater well. If the offsite source is used, this water would be trucked in from this well and stored in three permanent water storage tanks to support project operations.

Water would be used to clean the PV panels; dust and dirt build-up reduces the amount of incoming solar radiation striking the active PV layer within the panel. To reduce this effect, panel washing would be conducted three times per year over a 3-week period during operations, or additionally as necessitated. The water would drain by gravity to panel-washing trucks for use. Panel washing would require approximately 2.8 af (912,384 gallons) of water per year. In total, an estimated 5.6 af/yr of water would be used for panel washing, dust control and suppression during operation.

Three 10,000-gallon water tanks would be located throughout the site near the operation and maintenance building, BESS, and adjacent to the solar arrays. The water tanks would provide storage of water used for fire suppression. The tank would not require a regular supply of water because the water would be withdrawn only in the event of a fire. The tank would be monitored periodically and refilled as needed to replace evaporative losses. For fire suppression water supply, the project would conform to County requirements, which incorporate National Fire Protection Association (NFPA) Standards 1142 and 13 by reference and provide minimum requirements for fire suppression water supply where no public water supply is available (Standard 1142) and sprinkler systems (Standard 13).

2.7 Decommissioning and Site Reclamation

When the project reaches the end of its useful life, structures and equipment would be removed for reuse or sold as scrap, and the land surface would be reclaimed. A Decommissioning and Site Reclamation Plan has been prepared for the project. Because site conditions are likely to change over the life of the project, and to ensure that the decommissioning and site reclamation plan addresses all necessary conditions, the draft will be finalized and approved by the BLM before decommissioning and reclamation activities begin.

Upon decommissioning, aboveground structures would be dismantled and removed from the site. Where required by the BLM, concrete pads or foundations would be demolished, and rubble would be removed to an off-site disposal facility authorized to accept the waste. Belowground facilities may be disconnected at the surface and left in place in conformance with guidance and approval from the BLM. New project access roads and corridors would be closed, with the exception of Rasor Road, which would remain accessible.

Decommissioning of the substation and switchyard would involve deconstruction of structures. Salvaged materials would be recycled to the extent possible. Material that cannot be recycled would be transported for disposal in authorized landfills. Underground cabling and conduit may be left in place. The substation and office/storage areas would be graded to approximate the natural contour.

The applicant would prepare and implement a final closure and reclamation plan addressing removal of structures and site restoration in conformance with BLM requirements at the time of decommissioning. Construction hours and site cleanliness practices would be approximately the same during decommissioning as during construction.

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 8/7/2025 1:08:24 AM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Re: Soda Mountain- Can you send the contact info for the two Barstow venues

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Great, thanks! The contact for Holiday Inn Express is Jose and his phone is 760-253-0300. They are holding the room but will need a credit card to reserve it fully. Jose is aware the CEC will be reaching out directly to sort out details and payment.

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Wednesday, August 6, 2025 5:17 PM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Soda Mountain- Can you send the contact info for the two Barstow venues

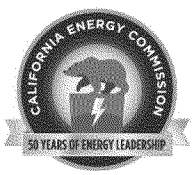
I will have our IT staff talk with the two Barstow venues to confirm they will work for the hybrid meeting.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Cruz, Manikhone [Manikhone.Cruz@dpw.sbcounty.gov]
Sent: 8/25/2025 4:42:13 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Sansonetti, Nancy [Nancy.Sansonetti@dpw.sbcounty.gov]
Subject: RE: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project
Attachments: CEQA Comment_CA Energy Commission_Notice of Application_Soda Mt Solar Project 24-OPT-03.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you Lisa,

Please find attached our comments for the subject project.

Regards,
Manikhone (Manie) Cruz
Planner III – Capital Improvement Section
Department of Public Works; Environmental Management Division
Phone: (909) 387-8109, Fax: (909) 387-7876
825 East Third Street, Room 123
San Bernardino, CA 92415-0835

SAN BERNARDINO COUNTY

Our job is to create a county in which those who reside and invest can prosper and achieve well-being.
www.SBCounty.gov

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Friday, August 22, 2025 5:32 PM
To: Rodriguez, Magdalena@Wildlife <Magdalena.Rodriguez@wildlife.ca.gov>; Calvert, Heidi@Wildlife <Heidi.Calvert@wildlife.ca.gov>; Sharma, Shankar@Wildlife <Shankar.Sharma@wildlife.ca.gov>; Wood, Brandy@Wildlife <Brandy.Wood@Wildlife.ca.gov>; Branch, Harllee@Wildlife <Harllee.Branch@Wildlife.ca.gov>; Lorentzen, Wayne@DTSC <Wayne.Lorentzen@dtsc.ca.gov>; Koch, Lori@DTSC <Lori.Koch@dtsc.ca.gov>; Ferouz, Muzhda@DTSC <Muzhda.Ferouz@dtsc.ca.gov>; Crader, Phillip@Waterboards <Phillip.Crader@waterboards.ca.gov>; Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>; Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; McCann, Lisa@Waterboards <lisa.mccann@waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Sansonetti, Nancy <Nancy.Sansonetti@dpw.sbcounty.gov>; Cruz, Manikhone <Manikhone.Cruz@dpw.sbcounty.gov>; info@sbcfire.org; Ornelas, Raylene <rornelas@sbcsd.org>; Liang, Aron <Aron.Liang@lus.sbcounty.gov>; Alaniz, David <David.Alaniz@dph.sbcounty.gov>; bradp@mdaqmd.ca.gov; Executive@CALFIRE <HQ.Executive@fire.ca.gov>; plenys.thomas@epa.gov; Katherine.kennedy@faa.gov; peter_sanzenbacher@fws.gov; Samples, Portia J <psamples@blm.gov>; icordes@blm.gov; Donnell, Julie A <jdonnell@blm.gov>; Anderson, Brandon G <bganderson@blm.gov>; Joan Patrovsky, PMP <jpatrovs@blm.gov>; afrancois@blm.cov; Jeff Ruesch <jruesch@mojavewater.org>; Taing, Adam@Waterboards <Adam.Taing@Waterboards.ca.gov>; Dennis.Lei@ladwp.com; Faranak.Sarbaz@ladwp.com; Sunaja.Lakshman@ladwp.com; Tin.Ha@ladwp.com
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Subject: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project

Some people who received this message don't often get email from lisa.worrall@energy.ca.gov. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello,

This week the California Energy Commission staff posted a notice of the August 29th Information and Environmental Scoping Meeting for the Soda Mountain Solar Project.

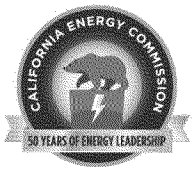
It will be a hybrid meeting via Zoom and in person at Holiday Inn Express in Barstow held between 1 to 5 pm.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



Main Office - 825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.7910 Fax: 909.387.7911

www.SBCounty.gov

SAN BERNARDINO COUNTY

Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

Noel Castillo, P.E.
Director

David Doublet, M.S., P.E.
Assistant Director

October 7, 2024

Transmitted Via Email
File: 10(ENV)-4.01

California Energy Commission
Attn: Lisa Worrall, Project Manager
715 P Street
Sacramento, CA 95814
lisa.worrall@energy.ca.gov

RE: PROJECT COMMENT – NOTICE OF APPLICATION FOR THE SODA MOUNTAIN SOLAR PROJECT (24-OPT-03) IN BARSTOW, SAN BERNARDINO COUNTY.

Dear Ms. Worrall:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on August 8, 2024,** and pursuant to our review, the following comments are provided:

Permits/Operations Support Division (Johnny Gayman, Engineering Manager, 909-387-7995):

The proposed Project site is located approximately 7 miles southwest of the community of Baker and approximately 50 miles northeast of Barstow, in unincorporated San Bernardino County, California.

1. The proposed Project in Barstow is adjacent to the San Bernardino County Maintained Road System (CMRS) along Razor Road. The applicant will need to obtain an encroachment permit if they are proposing any work within the CMRS. If you have any questions regarding this process, please contact the San Bernardino County Flood Control District, Permit Section at (909) 387-1863.

2. A Road Construction Permit will be required if any public road improvements are proposed within any County maintained road right-of-way on Razor Road. A Street Improvement Plan (SIP) permit may be required as a condition of approval for the Road Construction Permit.

BOARD OF SUPERVISORS

Col. Paul Cook (Ret.) Vice Chairman, First District | Jesse Armendarez Second District | Dawn Rowe Chair, Third District | Curt Hagman Fourth District | Joe Baca, Jr. Fifth District

Luther Snoke Chief Executive Officer

3. An Excavation Permit will be required if any public off-site utility work such as sewer, water, gas, electric, telephone/television cable, etc. that involve trenching or boring are proposed within any County maintained road right-of-way on Razor Road.

4. An Encroachment Permit will be required if conditions require a tie into an existing utility that falls with the CMRS road along Razor Road.

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

Nancy Sansonetti

Nancy J. Sansonetti, AICP
Supervising Planner, Capital Improvement Section
Environmental Management Division

NJS:MC:ml

Cc: Manie Cruz, Planner II

From: Patrovsky, Joan E [jpatrovs@blm.gov]
Sent: 8/28/2025 7:41:59 PM
To: lisa worrll [lworrll@energy.state.ca.us]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
CC: Stamer, Marc R [mstamer@blm.gov]
Subject: BLM & CEC - Soda Mtn Solar Project Amendment
Attachments: IM Department Review of Solar and Wind.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good day Lisa and Karcee,

The Bureau of Land Management (BLM) greatly appreciates our ongoing interagency coordination regarding the proposed Soda Mountain Solar Project.

BLM Field Manager Marc Stamer and I would like to schedule a call with you to discuss the status of the amendment application filed, as well as our perspective on the NEPA schedule.

As you may be aware, the Administration—through recent Executive Orders and Department of the Interior (DOI) guidance—has established new procedures for renewable energy projects. Please see the attached memorandum outlining updated requirements for wind and solar projects. Under this direction, all such projects must undergo additional review by the DOI prior to further processing.

We would like to propose a 30-minute call on **Thursday, September 4**. Please let us know your availability.

Best regards,

Joan Patrovsky, PMP
Project Manager
U.S. Department of the Interior - Region 8 and 10
Bureau of Land Management
California Desert District Office



"What you do today can improve all your tomorrows."- Ralph Marston

CONFIDENTIALITY NOTICE: This message including any attachments is intended exclusively for the individual(s) or entity to which it is addressed. This communication may contain information which is proprietary, privileged, confidential, or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it without the express authorization from the author.

From: Patrovsky, Joan E [jpatrovs@blm.gov]
Sent: 8/28/2025 7:43:07 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Re: [EXTERNAL] Fw: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you received

Joan Patrovsky, PMP
Project Manager
U.S. Department of the Interior - Region 8 and 10
Bureau of Land Management
California Desert District Office

"What you do today can improve all your tomorrows."- Ralph Marston

CONFIDENTIALITY NOTICE: This message including any attachments is intended exclusively for the individual(s) or entity to which it is addressed. This communication may contain information which is proprietary, privileged, confidential, or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it without the express authorization from the author.

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Thursday, August 28, 2025 9:29 AM
To: Francois, Alexis N <afrancois@blm.gov>; Donnell, Julie A <jdonnell@blm.gov>; Samples, Portia J <psamples@blm.gov>; Patrovsky, Joan E <jpatrovs@blm.gov>; Otahal, Christopher D <cotahal@blm.gov>
Subject: [EXTERNAL] Fw: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi all,

Here is the public notice of tomorrow's Information and Environmental Scoping Meeting. Our Notice of Preparation comment period closes at 5pm September 3rd.

Let me know if you plan on submitting comments on the NOP.

Thanks,

Lisa Worrall

Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Friday, August 22, 2025 5:32 PM
To: Rodriguez, Magdalena@Wildlife <Magdalena.Rodriguez@wildlife.ca.gov>; Calvert, Heidi@Wildlife <Heidi.Calvert@wildlife.ca.gov>; Sharma, Shankar@Wildlife <Shankar.Sharma@wildlife.ca.gov>; Wood, Brandy@Wildlife <Brandy.Wood@Wildlife.ca.gov>; Branch, Harllee@Wildlife <Harllee.Branch@Wildlife.ca.gov>; Lorentzen, Wayne@DTSC <Wayne.Lorentzen@dtsc.ca.gov>; Koch, Lori@DTSC <Lori.Koch@dtsc.ca.gov>; Ferouz, Muzhda@DTSC <Muzhda.Ferouz@dtsc.ca.gov>; Crader, Phillip@Waterboards <Phillip.Crader@waterboards.ca.gov>; Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov>; Steinert, Tiffany@Waterboards <Tiffany.Steinert@Waterboards.ca.gov>; McCann, Lisa@Waterboards <lisa.mccann@waterboards.ca.gov>; Guerra, Christina@Waterboards <Christina.Guerra@waterboards.ca.gov>; Sansonetti, Nancy <nancy.sansonetti@dpw.sbcounty.gov>; Cruz, Manikhone <manikhone.cruz@dpw.sbcounty.gov>; info@sbcfire.org <info@sbcfire.org>; rornelas@sbcsd.org <rornelas@sbcsd.org>; Aron.Liang@lus.sbcounty.gov <Aron.Liang@lus.sbcounty.gov>; david.alaniz@dph.sbcounty.gov <david.alaniz@dph.sbcounty.gov>; bradp@mdaqmd.ca.gov <bradp@mdaqmd.ca.gov>; Executive@CALFIRE <HQ.Executive@fire.ca.gov>; plenys.thomas@epa.gov <plenys.thomas@epa.gov>; Katherine.kennedy@faa.gov <Katherine.kennedy@faa.gov>; peter_sanzenbacher@fws.gov <peter_sanzenbacher@fws.gov>; Samples, Portia J <psamples@blm.gov>; icordes@blm.gov <icordes@blm.gov>; Donnell, Julie A <jdonnell@blm.gov>; Anderson, Brandon G <bganderson@blm.gov>; Joan Patrovsky, PMP <jpatrovs@blm.gov>; afrancois@blm.cov <afrancois@blm.cov>; Jeff Ruesch <jruesch@mojavewater.org>; Taing, Adam@Waterboards <Adam.Taing@Waterboards.ca.gov>; Dennis.Lei@ladwp.com <Dennis.Lei@ladwp.com>; Faranak.Sarbaz@ladwp.com <Faranak.Sarbaz@ladwp.com>; Sunaja.Lakshman@ladwp.com <Sunaja.Lakshman@ladwp.com>; Tin.Ha@ladwp.com <Tin.Ha@ladwp.com>
Cc: Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Knight, Eric@Energy <Eric.Knight@energy.ca.gov>
Subject: Notification of upcoming public Information and Environmental Scoping Meeting for the Soda Mountain Solar Project

Hello,

This week the California Energy Commission staff posted a notice of the August 29th Information and Environmental Scoping Meeting for the Soda Mountain Solar Project.

It will be a hybrid meeting via Zoom and in person at Holiday Inn Express in Barstow held between 1 to 5 pm.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 8/18/2025 5:57:40 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Soda Mt. Solar
Attachments: Soda Mt. Solar CEC Scoping Meeting.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

A few items for you related to Soda Mt. Solar:

1. Attached is the Applicant's presentation for the NOP Scoping Meeting. We will keep the presentation to a max of 5 minutes. If you have any requested revisions, please let me now.
2. Does your IT department have any specific requirements for the mobile TV monitor? I thought I should ask if there are any specific requests prior to renting this.
3. We will be docketing all items in the CEC's 7/31/25 Request for Information this week, within the requested 3 week timeline.
4. We had a productive call with the BLM today regarding the CEC's 8/11/25 request for a cultural resources survey of the access road. We are planning to submit the BLM forms today for their review and they indicated it would take up to a week to authorize this survey request. I just wanted to pass along this timeline to let you know we are working on this.

If you need anything from me, please don't hesitate to reach out.

Best,
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

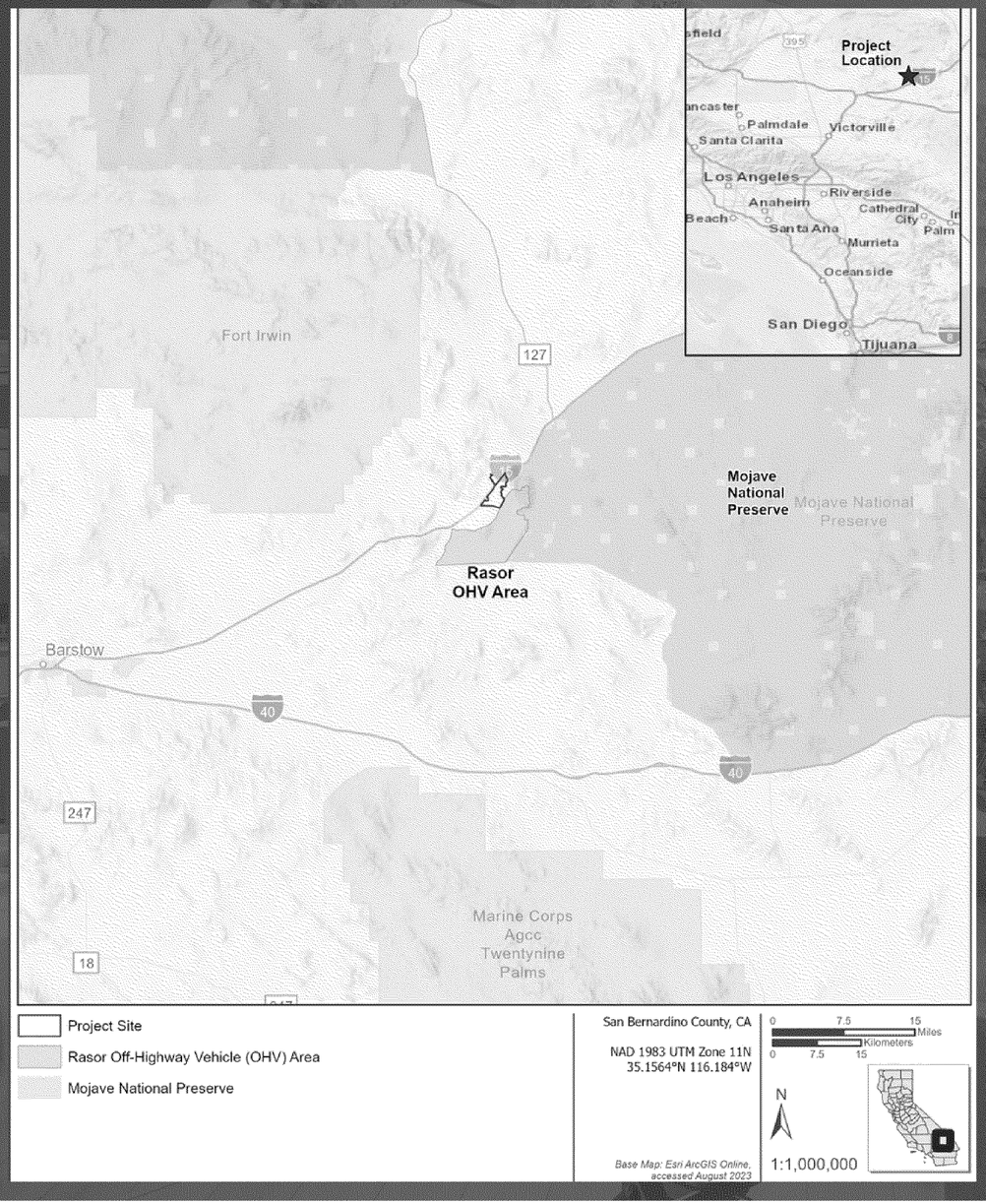
August 2025

SODA MOUNTAIN SOLAR PROJECT

- 300 megawatt photovoltaic solar
- 300 megawatt battery energy storage
- 2,670 acres of BLM land
- Unincorporated San Bernardino County



PROJECT LOCATION



- Approximately 2,670 acres of BLM land in unincorporated San Bernardino County, located 6 miles southwest of the town of Baker, California.
- Bounded directly to the east by the Mojave National Preserve (administered by the National Park Service) and BLM lands, including the Rasor Off-Highway Vehicle recreation area at the southeast corner.
- Interstate 15 (I-15), the former Arrowhead Trail Highway, runs along the western boundary of the project site, with Rasor Road Services Shell Oil gas station located off I-15 southwest of the project site, along the access road to the project site.

EXISTING SITE CONDITIONS



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.



Infrastructure surrounding the site includes two high-voltage electric transmission lines, an electrical distribution line, wireless cellular telephone towers, two fiber-optic cables, and two fuel pipelines. The two high-voltage electrical transmission lines to the west of I-15 are a 115-kV sub-transmission line owned by Southern California Edison and the Marketplace-Adelanto 500-kV transmission line operated by the Los Angeles Department of Water and Power (LADWP).



The project site is located within the BLM's California Desert District, within the jurisdiction of the Barstow Field Office.

CDFW has an existing agreement to build a wildlife crossing in the area for the High Speed Rail Project.

Project Overview

- Proposal to construct, operate, maintain, and decommission a 300 megawatt (MW) photovoltaic solar, and 300 MW battery energy storage facility.

- Construction and operation would result in the disturbance of approximately 2,059 acres of 2,670 acre site.

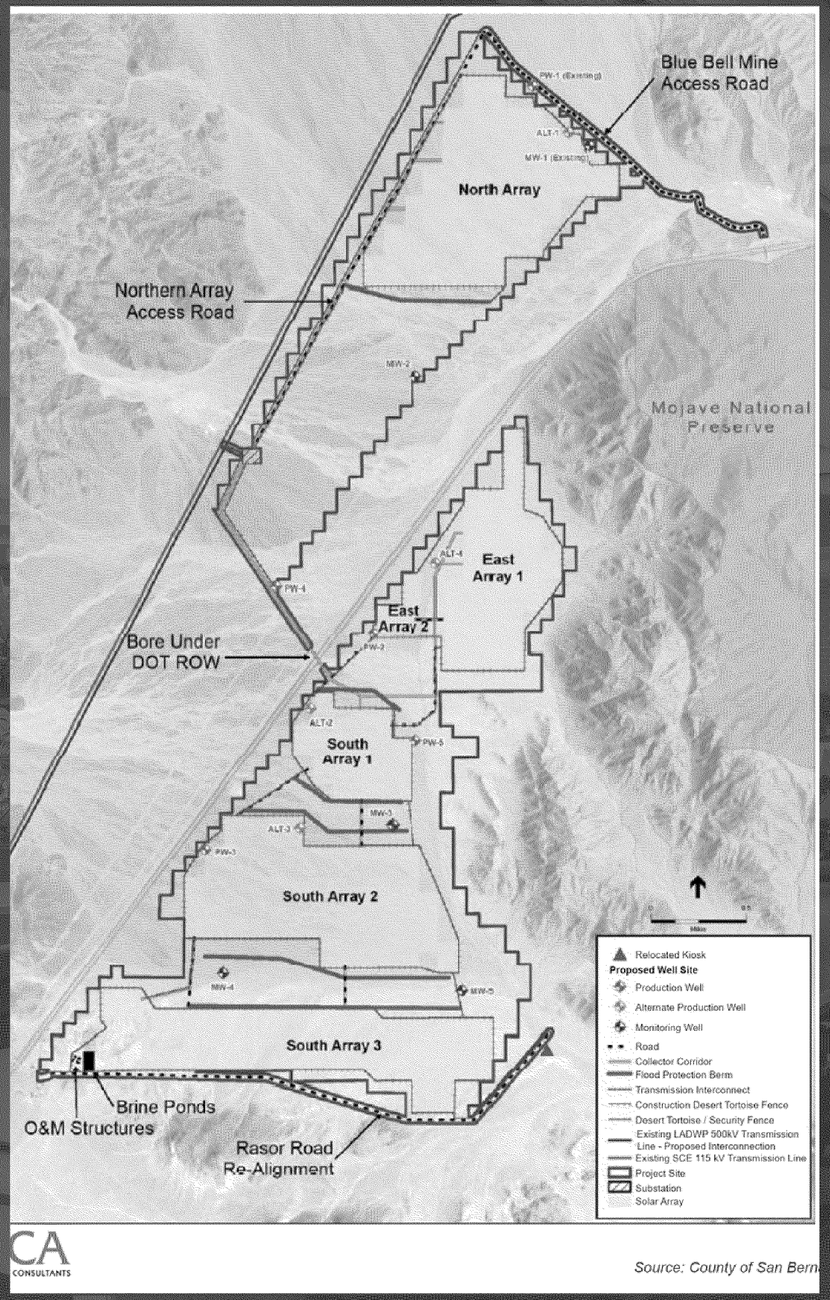
- The Project would generate and deliver renewable solar power to the regional electrical grid through an interconnection with the existing Mead-Adelanto 500-kV transmission line operated by the LADWP.

- 2015 EIR/EIS was prepared with a ROD issued by BLM. However, the County of San Bernardino declined to issue groundwater well permits or certify the Project's EIR.

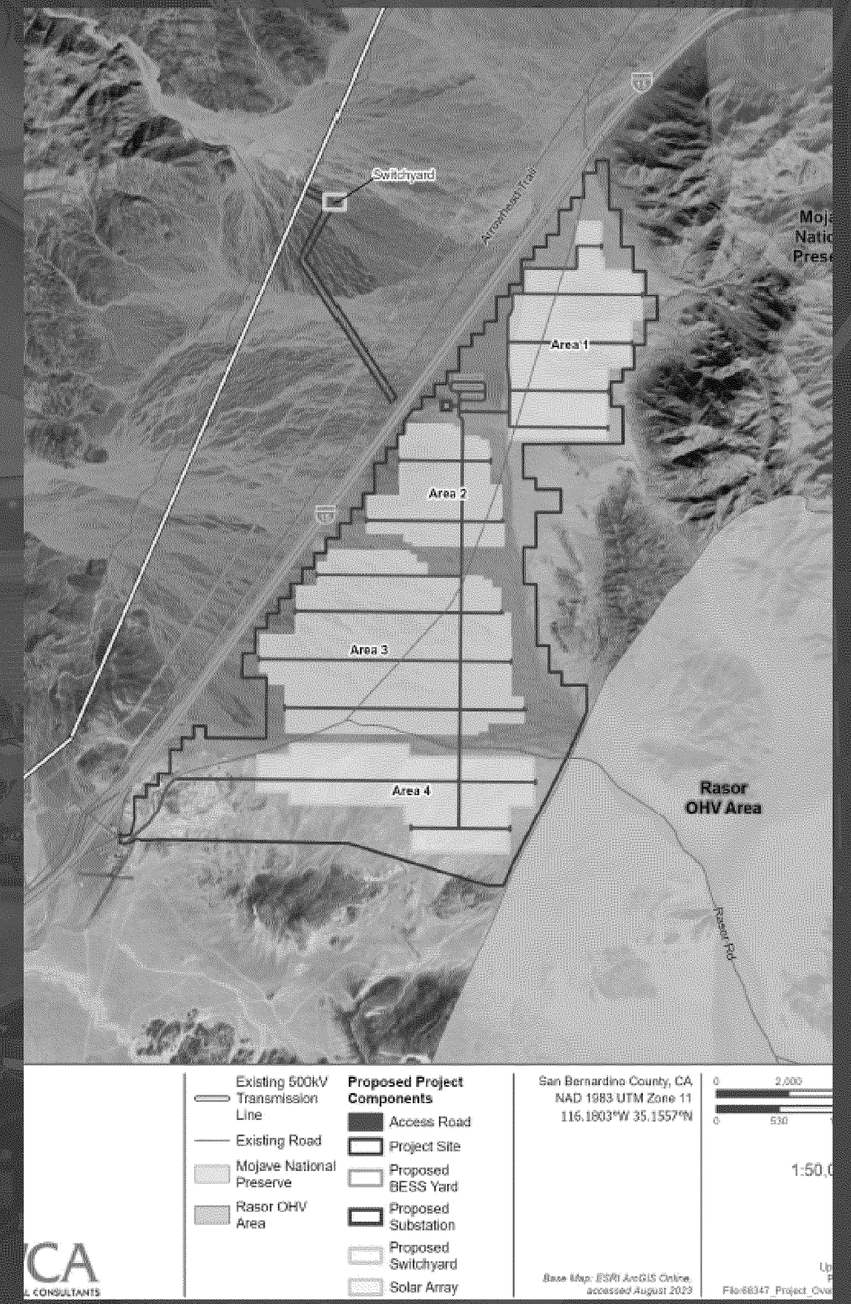


PROJECT HISTORY

The revised project configuration removes 571 acres from the original development footprint (the North Solar Array). This reduces impacts to visual resources, water resources, biological resources and desert bighorn sheep.



2015 Project



2025 Project

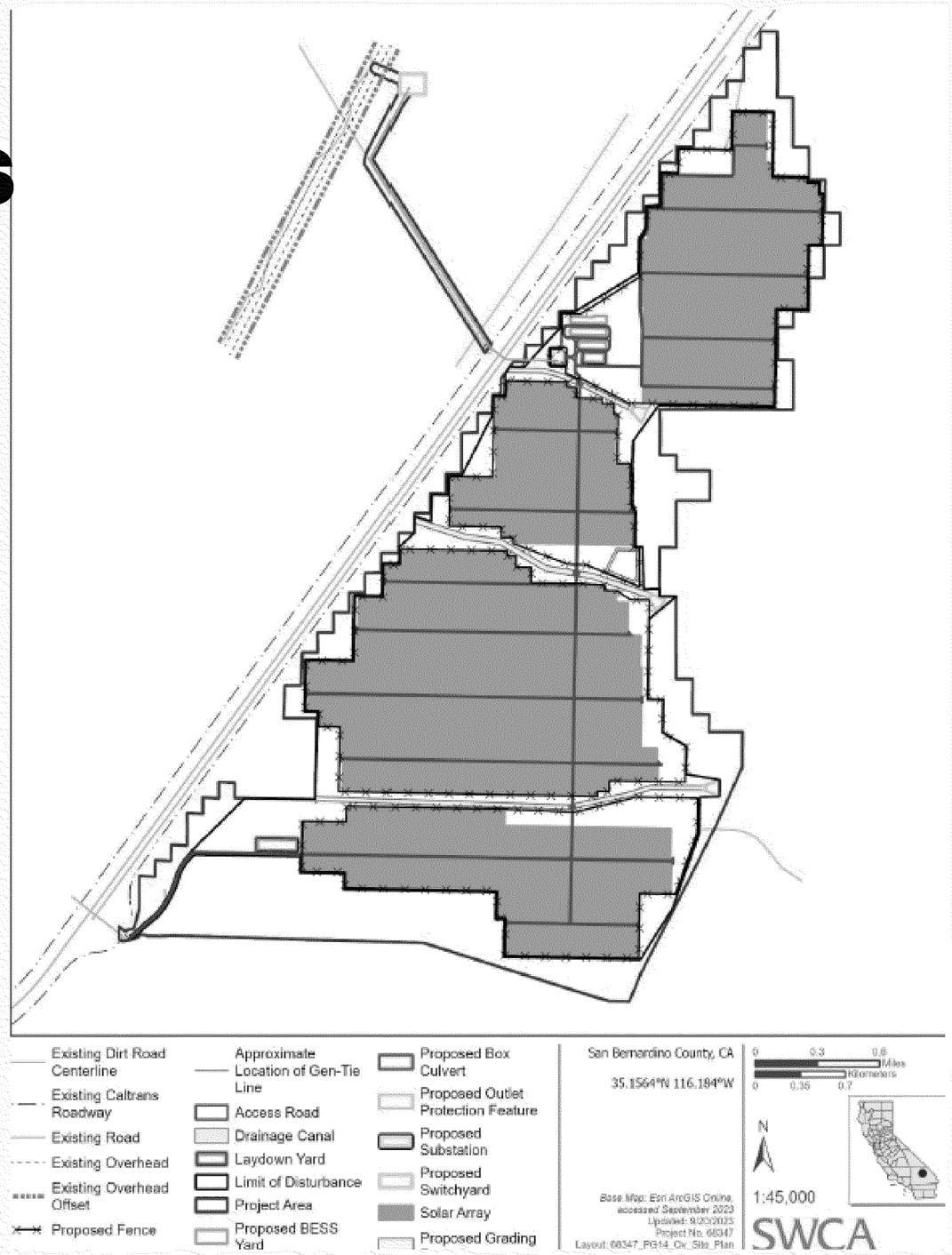
SMSP01824

Project Components

The proposed project components are as follows:

1. The solar plant site (i.e., all facilities that create a footprint in and around the field of solar panels, including the solar field consisting of solar power arrays identified as Area 1, 2, 3 and 4, operation and maintenance (O&M) buildings and structures, stormwater infrastructure, and related infrastructure and improvements.
2. A substation and switchyard for interconnection to the existing transmission system.
3. Gen-tie line connecting project substation, switchyard, and 500-kV Mead-Adelanto line.
4. Approximately 300 MW/1,200 MWh of battery energy storage system (BESS) across 18 acres.

The project will connect to an existing tranmission line with availability capacity.



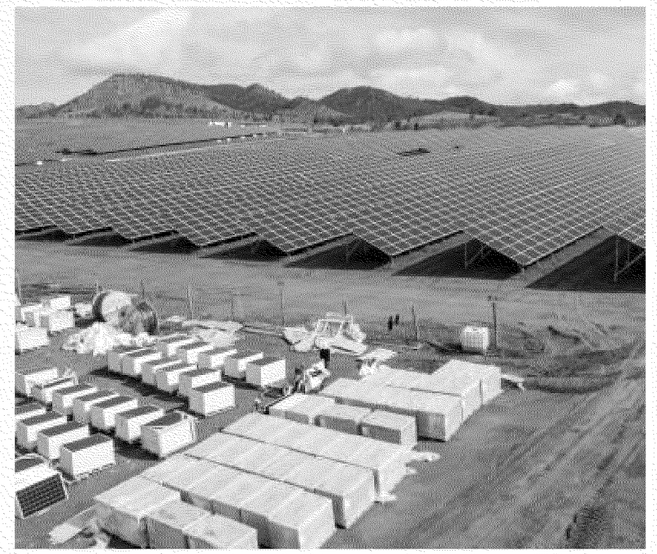
PROJECT CONSTRUCTION



Construction is anticipated to begin in Q2 of 2026 and occur over an approximately 18-month period and consist of overlapping construction stages.



Stage 1 would include mobilization, site preparation, fencing, preparation of laydown areas, and trenching. Stage 2 would include installation of solar array structural components including cables, piles, racking systems, inverters, and modules. Stage 3 would include installation of solar panels, battery storage systems, commissioning, and testing.



An average of 200 construction workers would operate daily on-site, with an anticipated 300 construction workers during peak construction activities.

PROJECT OPERATION



The project substation would be uncrewed during operation. However, a workforce of approximately 25 to 40 personnel would visit the substation on an as needed basis for maintenance, equipment operation, and/or security.



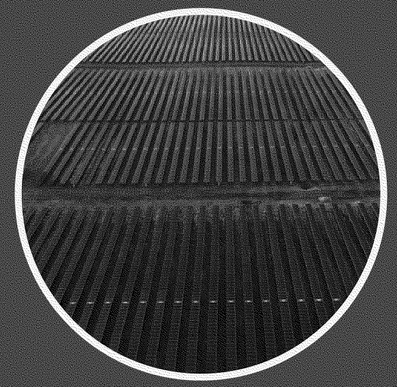
Operational needs at the site include monitoring and optimizing the power generated by the solar arrays and interconnection with the transmission lines, operating the Supervisory Control and Data Acquisition system, troubleshooting the collector lines and repairing damaged cables, and conducting panel-washing activities periodically through the year.



The project would be remotely controlled, eliminating the need for permanent on-site employees. The facility would not be accessible to the public, and access will be infrequent and limited to authorized personnel.



PROJECT NEED



Supports long-term clean energy reliability by providing zero emitting power generation paired with battery energy storage.

Supports the State's GHG emissions reduction targets for 2030 and the State goal of 100 percent zero carbon electricity resources by 2045.

Would connect to the existing LADWP Mead – Adelanto 500-kV transmission line that has ample unused capacity therefore eliminating the need for new transmission lines.

Existing Interconnection Agreement.

Battery Storage increases grid and generation reliability, dispatchability and stability.

Provides the capacity needed to support decommissioning of existing thermal and nuclear power plants.

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 8/19/2025 6:42:39 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Re: Soda Mt. Solar
Attachments: Soda Mt. Solar NOP Scoping Presentation.pptx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi! I am not sure if this email transmitted or not yesterday, so I am resending.

If you need anything else, please let me know!

Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Monday, August 18, 2025 11:44 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Re: Soda Mt. Solar

Hi Hannah,

Can you send me the power point slides so I can include them in our master slide deck? Thanks.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Monday, August 18, 2025 11:26 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Re: Soda Mt. Solar

The venue will provide a podium. Thanks.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Monday, August 18, 2025 11:24 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Re: Soda Mt. Solar

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Do you also need a podium? I didn't see that in the list of things the hotel has or that you needed me to rent, but I recall it coming up. So, just wanted to check on that.

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Monday, August 18, 2025 11:08:33 AM
To: Williams, Kevin@Energy <Kevin.Williams@Energy.ca.gov>
Cc: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Re: Soda Mt. Solar

Thanks.

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Williams, Kevin@Energy <Kevin.Williams@Energy.ca.gov>
Sent: Monday, August 18, 2025 11:06 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: RE: Soda Mt. Solar

Hi Lisa,

Great! Thank you both for arranging this. The only requirements are that the TV has at least one HDMI port and measures 40 inches or larger to ensure good visibility for those on the dais.

Thanks,

Kevin Williams
Customer Support Unit
Information Technology Services
Administration Division
916-980-7955

California Energy Commission
Website: www.energy.ca.gov

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Monday, August 18, 2025 11:01 AM
To: Williams, Kevin@Energy <Kevin.Williams@Energy.ca.gov>
Cc: Hannah Arkin <hannah@resolutionenvironmental.com>
Subject: Fw: Soda Mt. Solar

Hi Kevin,

Hannah will be able to supply a TV monitor. Can you check out her email below and let her know if there are any specific you need for the TV.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Monday, August 18, 2025 10:57 AM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Soda Mt. Solar

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Hi Lisa,

A few items for you related to Soda Mt. Solar:

1. Attached is the Applicant's presentation for the NOP Scoping Meeting. We will keep the presentation to a max of 5 minutes. If you have any requested revisions, please let me now.
2. Does your IT department have any specific requirements for the mobile TV monitor? I thought I should ask if there are any specific requests prior to renting this.
3. We will be docketing all items in the CEC's 7/31/25 Request for Information this week, within the requested 3 week timeline.
4. We had a productive call with the BLM today regarding the CEC's 8/11/25 request for a cultural resources survey of the access road. We are planning to submit the BLM forms today for their review and they indicated it would take up to a week to authorize this survey request. I just wanted to pass along this timeline to let you know we are working on this.

If you need anything from me, please don't hesitate to reach out.

Best,
Hannah

Hannah Arkin
CEO
Resolution Environmental
262 B Avenue, Coronado, CA 92118
760-504-4109

From: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Sent: 7/29/2025 11:13:22 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Cabrera, Crystal@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ed6e32a127144ccfa19a6f4347765a9e-00a33618-ff]; Ponce, Mariah@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc5faa5d564c4cf3a2f49468b736b6c2-b2346f64-e7]; Black, Devin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c6ec9f417a6e448aae52465b9f719b5d-ea9475b4-16]; Hannah Gbeh [hannah@resolutionenvironmental.com]
CC: Aronson, Jacob [jaronson@allenmatkins.com]; Epstein, Barry [bepstein@allenmatkins.com]; Palmer, Dana [dpalmer@allenmatkins.com]
Subject: CEC legal/Applicant legal discussion- Soda Mountain
Location: Microsoft Teams Meeting
Start: 7/31/2025 5:00:00 PM
End: 7/31/2025 6:00:00 PM
Show Time As: Busy
Recurrence: (none)
Required Attendees: Cabrera, Crystal@Energy; Ponce, Mariah@Energy; Black, Devin@Energy; Hannah Gbeh
Optional Attendees: Aronson, Jacob; Epstein, Barry; Palmer, Dana

---

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 296 810 083 684 5

Passcode: 7sS398FS

Dial in by phone

+1 916-562-1816,,939385463# United States, Sacramento

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Phone conference ID: 939 385 463#

For organizers: Meeting options | Reset dial-in PIN

From: Energy - ConfidentialityApplication [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=19A1DCD64C75492BB26F16BE163474E8-ENERGY - CO]
Sent: 8/18/2025 4:44:30 PM
To: hannah@resolutionenvironmental.com
CC: Ponce, Mariah@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc5faa5d564c4cf3a2f49468b736b6c2-b2346f64-e7]; Camberos, Blanca@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9a468cc1041442469599fcd37b1744b6-9d3be3a1-fb]
Subject: CEC Response to Soda Mountain Solar Project's Application for Confidentiality - Worker Safety
Attachments: CEC Response Letter to Soda Mountain 07.21.25 and 07.30.2025 Apps for Conf.pdf

Dear Soda Mountain Solar, LLC, c/o, Hannah Arkin and David Velasco,

Attached please find a copy of the CEC Response to Soda Mountain Solar Project's Application for Confidentiality - Worker Safety, filed with the CEC on July 21 and 30, 2025, (TN 264955 and 265167).

Kindly,

Marianna Brewer
Legal Analyst : Chief Counsel's Office
Advocacy & Compliance Division
279-250-8838
California Energy Commission
www.energy.ca.gov

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From: Ponce, Mariah@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BC5FAA5D564C4CF3A2F49468B736B6C2-B2346F64-E7]
Sent: 7/23/2025 3:28:46 PM
To: Palmer, Dana [dpalmer@allenmatkins.com]; Giorgi, Erika@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d171e5d706e34c26ad9d13c230f2349f-1324b266-6e]
Subject: RE: Application for Confidential Designation: Potentia-Viridi Battery Storage Energy Storage System Project

Thank you, Dana. The additional information is helpful. We are still discussing this application internally but should have an answer shortly.

Best,
Mariah

Mariah Ponce
Attorney I
Chief Counsel's Office
California Energy Commission
(916) 559-4166

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From: Palmer, Dana <dpalmer@allenmatkins.com>
Sent: Tuesday, July 22, 2025 9:56 PM
To: Giorgi, Erika@Energy <Erika.Giorgi@Energy.ca.gov>; Ponce, Mariah@Energy <Mariah.Ponce@Energy.ca.gov>
Subject: RE: Application for Confidential Designation: Potentia-Viridi Battery Storage Energy Storage System Project

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Good Evening Erika and Mariah,

Regarding the confidentiality of the UL9540A reports, we developed the following points to share with you:

- The UL9540A reports constitute trade secrets of both the battery manufacturers and Levy Alameda because they contain information that is not "generally known to or readily ascertainable by business competitors or others to whom the information would have some economic value." (*Syngenta Crop Protection, Inc. v. Helliker*, 138 Cal. App. 4th 1135, 1172 (2006).)
    - With respect to battery manufacturers, the UL9540A reports are trade secrets because they contain confidential test results with proprietary information about the manufacturing and performance of their respective battery products. This information is not known by competitors and cannot be readily ascertained or reverse-engineered.
    - With respect to Levy Alameda, the UL9540A reports are trade secrets because they contain the identities of the battery products that Levy Alameda is considering for its project. The potential counterparties (i.e., battery manufacturers) with whom Levy Alameda may negotiate do not know the identities of other products that Levy Alameda is considering, and cannot ascertain that information through proper or public means. Revealing this information will provide a competitive advantage to counterparties (i.e., battery

manufacturers) with whom Levy Alameda may negotiate. The existence, status, and substance of contract negotiations is a trade secret under Civ. Code § 3426.1(d). (*Competitive Technologies v. Fujitsu Ltd.*, 286 F. Supp. 2d 1118,1147 (2003).)

- The trade secrets privilege allows the holder of the privilege (in this case, the battery manufacturers) to prevent other parties (in this case, Levy Alameda) from disclosing trade secrets. Levy Alameda received the UL9540A reports from the battery manufacturers under confidentiality/nondisclosure agreements. Levy Alameda is not authorized to publicly disclose the UL9540A reports without permission of the battery manufacturers. If CEC rejects the confidentiality request, Levy Alameda will need to withdraw its filing of the UL9540A reports in order to maintain its confidentiality obligations to the battery manufacturers, or else it could face substantial liability for breaching the applicable confidentiality/nondisclosure agreements.

- The fact that a different manufacturer's (i.e., CATL) UL9540A report has been disclosed publicly has no bearing on whether other battery manufacturers derive independent economic value from the UL9540A reports for their own respective batteries. Other battery manufacturers take efforts to maintain the secrecy of their UL9540A reports, which measures have included requiring Levy Alameda to sign confidentiality/nondisclosure agreements.

- Similarly, the fact that the developer of the Corby Energy Storage Project disclosed the CATL UL9540A report has no bearing on whether Levy Alameda derives independent economic value from maintaining secrecy over the potential batteries they may use for the Potentia Viridi Project.

- Notably, the applicant of the Soda Mountain Solar Project also has asserted confidentiality of UL9540A reports. (See TN#264955.) Other Opt-In applicants may also have claimed, or will claim, confidentiality.

We are happy to discuss when timely.

Best,
Dana

From: Giorgi, Erika@Energy <Erika.Giorgi@Energy.ca.gov>
Sent: Wednesday, July 16, 2025 10:17 AM
To: Palmer, Dana <dpalmer@allenmatkins.com>
Cc: Ponce, Mariah@Energy <Mariah.Ponce@Energy.ca.gov>
Subject: RE: Application for Confidential Designation: Potentia-Viridi Battery Storage Energy Storage System Project

CAUTION: External Email

Yes! Thank you

From: Palmer, Dana <dpalmer@allenmatkins.com>
Sent: Wednesday, July 16, 2025 10:16 AM
To: Giorgi, Erika@Energy <Erika.Giorgi@Energy.ca.gov>
Cc: Ponce, Mariah@Energy <Mariah.Ponce@Energy.ca.gov>
Subject: Re: Application for Confidential Designation: Potentia-Viridi Battery Storage Energy Storage System Project

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Works well! May I send a Teams item? (Last time did not seem to work well for us though)

On Jul 16, 2025, at 9:17 AM, Giorgi, Erika@Energy <Erika.Giorgi@energy.ca.gov> wrote:

CAUTION: External Email

Thanks Dana
Today ended up being fairly busy but I can talk tomorrow at 11? Would that work?
Erika

Erika Giorgi
Senior Attorney
California Energy Commission – Chief Counsel's Office, MS-14
715 P Street, Sacramento, CA 95814
(279) 250-8801

From: Palmer, Dana <dpalmer@allenmatkins.com>
Sent: Tuesday, July 15, 2025 11:44 AM
To: Giorgi, Erika@Energy <Erika.Giorgi@Energy.ca.gov>
Cc: Ponce, Mariah@Energy <Mariah.Ponce@Energy.ca.gov>
Subject: RE: Application for Confidential Designation: Potentia-Viridi Battery Storage Energy Storage System Project

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Hi Erika and Mariah,

Thanks for getting in touch. How is the afternoon looking for you two tomorrow and Thursday? I'm pretty open, with the exception of 2pm to 3pm on Thursday.

Best,
Dana

Dana P. Palmer, Esq.
Partner | Allen Matkins Leck Gamble Mallory & Natsis LLP
1901 Avenue of the Stars, Suite 1800, Los Angeles, CA 90067
(310) 788-2444 (direct) | (310) 463-6706 (mobile)
dpalmer@allenmatkins.com
Allen Matkins

From: Giorgi, Erika@Energy <Erika.Giorgi@Energy.ca.gov>
Sent: Tuesday, July 15, 2025 9:23 AM
To: Palmer, Dana <dpalmer@allenmatkins.com>
Cc: Ponce, Mariah@Energy <Mariah.Ponce@Energy.ca.gov>
Subject: Application for Confidential Designation: Potentia-Viridi Battery Storage Energy Storage System Project

CAUTION: External Email

Hi Dana
Mariah and I would like to schedule a quick call to discuss CEC's review of Application for Confidential Designation for the Potentia-Viridi Battery Storage Energy Storage System Project. Do you have any availability Wednesday or Thursday to discuss?
Thanks,
Erika

Erika Giorgi
Senior Attorney
California Energy Commission – Chief Counsel's Office, MS-14
715 P Street, Sacramento, CA 95814
(279) 250-8801

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From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 9/18/2025 10:44:25 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; DeLano, Kevin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=de745a362d214bfbb777e8fd9d9193da-5e9a22f8-24]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Hughes, Joseph@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7dd5e80572b644209e9607ba7bdcb630-Hughes, Jos]; Hannah Arkin [hannah@resolutionenvironmental.com]
Subject: Soda Mountain Preliminary Geotech Report
Location: Microsoft Teams Meeting

Start: 9/22/2025 10:30:00 PM
End: 9/22/2025 11:00:00 PM
Show Time As: Tentative

Recurrence: (none)
Required Attendees: Chang, Kaycee@Energy; Knight, Eric@Energy; DeLano, Kevin@Energy; Abulaban, Abdel-Karim@Energy; Hughes, Joseph@Energy; Hannah Arkin

Meeting to discuss this feedback from the applicant:
We reviewed the geotechnical report example provided by the CEC, and there is some information we will not be able to provide within the desired timeline. We still intend to docket a site-specific geotechnical report as soon as possible. However, given the example report and CEC's associated timeline, we think it would be helpful to schedule another call to discuss.

Microsoft Teams Need help?

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Meeting ID: 216 611 966 928

Passcode: rE68f8rK

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+1 916-562-1816,,132257599# United States, Sacramento

Find a local number

Phone conference ID: 132 257 599#

For organizers: Meeting options | Reset dial-in PIN

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 9/9/2025 3:41:02 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: DeLano, Kevin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=de745a362d214bfbb777e8fd9d9193da-5e9a22f8-24]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Soda Mountain- Project site-specific preliminary geotechnical studies and cultural survey for new access road

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Hi Lisa,

I have received your question regarding the site-specific geotechnical report and geotechnical borings. Please add this item to our agenda for the 2pm call today and we can discuss.

Thank you,
Hannah

Hannah Arkin

CEO

Resolution Environmental

262 B Avenue, Coronado, CA 92118

760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Tuesday, September 9, 2025 8:02 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: DeLano, Kevin@Energy <Kevin.DeLano@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Soda Mountain- Project site-specific preliminary geotechnical studies and cultural survey for new access road

Hi Hannah,

We understand from BLM that they have sent a request for survey access for approval and was wondering whether the preliminary geotechnical studies are waiting for BLM's approval for project site access to carry out the surveys.

I wanted to alert you to this question before our meeting today. This is affecting the due date for the section to me and I need to get an estimate of when we might expect the preliminary geotechnical report.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 9/9/2025 10:16:41 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: DeLano, Kevin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=de745a362d214bfbb777e8fd9d9193da-5e9a22f8-24]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Soda Mountain- Project site-specific preliminary geotechnical studies and cultural survey for new access road
Attachments: TN254674_20240223T170827_Data Response Set 1 Appendix A - Geotechnical Report Vol 1 Part 1 .pdf

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Hi All,

Thank you for a productive phone call today. Could you please confirm that the attached geotechnical report for the Darden project is the one we referenced during our call today? There are multiple volumes to the report, but I have only attached volume 1 for reference.

Thanks!
Hannah

Hannah Arkin

CEO

Resolution Environmental

262 B Avenue, Coronado, CA 92118

760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Tuesday, September 9, 2025 8:02 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: DeLano, Kevin@Energy <Kevin.DeLano@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Soda Mountain- Project site-specific preliminary geotechnical studies and cultural survey for new access road

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Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: DeLano, Kevin@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DE745A362D214BFBB777E8FD9D9193DA-5E9A22F8-24]
Sent: 9/9/2025 10:55:51 PM
To: Hannah Arkin [hannah@resolutionenvironmental.com]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Soda Mountain- Project site-specific preliminary geotechnical studies and cultural survey for new access road

Hi Hannah,

Yes.

Thank you,
Kevin DeLano

Kevin M. DeLano, P.G. 10178, M.S. (he/him/his)
Geosciences Unit
Siting, Transmission, and Environmental Protection Division
kevin.delano@energy.ca.gov
279-226-1043

Vice President for Rank and File
PECG River City Section



California Energy Commission
Website: www.energy.ca.gov



From: Hannah Arkin <hannah@resolutionenvironmental.com>
Sent: Tuesday, September 9, 2025 3:16 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Cc: DeLano, Kevin@Energy <Kevin.DeLano@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Re: Soda Mountain- Project site-specific preliminary geotechnical studies and cultural survey for new access road

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Thanks!
Hannah

Hannah Arkin

CEO

Resolution Environmental

262 B Avenue, Coronado, CA 92118

760-504-4109

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Tuesday, September 9, 2025 8:02 AM
To: Hannah Arkin <hannah@resolutionenvironmental.com>
Cc: DeLano, Kevin@Energy <Kevin.DeLano@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Soda Mountain- Project site-specific preliminary geotechnical studies and cultural survey for new access road

Hi Hannah,

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Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov



From: Patrovsky, Joan E [jpatrovs@blm.gov]
Sent: 9/15/2025 5:06:12 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
CC: Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; DeLano, Kevin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=de745a362d214bfbb777e8fd9d9193da-5e9a22f8-24]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Stamer, Marc R [mstamer@blm.gov]; Cordes, Isabeau J [icordes@blm.gov]
Subject: Re: [EXTERNAL] Fw: Groundwater Test Well Report, Soda Mountain Solar Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa,

The bureau will look through the case files tomorrow and if found, send you copies.

Best regards,
Joan Patrovsky, PMP
Project Manager
U.S. Department of the Interior - Region 8 and 10
Bureau of Land Management
California Desert District Office

"What you do today can improve all your tomorrows."- Ralph Marston

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From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Friday, September 12, 2025 4:38 PM
To: Patrovsky, Joan E <jpatrovs@blm.gov>
Cc: Ackerman, James@Energy <james.ackerman@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; DeLano, Kevin@Energy <Kevin.DeLano@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: [EXTERNAL] Fw: Groundwater Test Well Report, Soda Mountain Solar Project

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi Joan,

I was wondering if you have any of the following reports:

1. Panorama Environmental, Inc., 2014. Groundwater Well Test Report. November.
2. Diaz-Yourman and Associates. 2010. Preliminary Geotechnical Investigation (Phase 1A), Caithness Soda Mountain Solar Facility Project, Baker, San Bernardino County, California. December 2010
3. Terra Physics, 2010. Geophysical Characterization of Subsurface Physical Properties, Caithness LLC—Soda Mountain Solar Facility, Southwest of Baker, San Bernardino County, California, dated December 10, 2010, Project No. 09-63, 58 p. Prepared for Wilson Geosciences, December 2011.

Staff are particularly interested in the Panorama report we want to see the actual aquifer testing results, not just a description, which the applicant provided.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Sent: Thursday, September 11, 2025 3:07 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Groundwater Test Well Report, Soda Mountain Solar Project

Lisa: This is the reference I was referring to:

Panorama Environmental, Inc., 2014. Groundwater Well Test Report. November.

It was only cited in the water resources section of the previous FEIR, so perhaps the BLM has a copy.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division
Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 9/25/2025 6:30:58 PM
To: Joan Patrovsky, PMP [jpatrovs@blm.gov]
CC: Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]; Abulaban, Abdel-Karim@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1ff1d38281a4068b2708271d22c0d94-Abulaban, A]; DeLano, Kevin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=de745a362d214bfbb777e8fd9d9193da-5e9a22f8-24]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
Subject: Re: Groundwater Test Well Report, Soda Mountain Solar Project

Thanks for yesterday's meeting. As you mentioned, I believe you may have some of these reports. We would appreciate receiving them as soon as you locate them. If the file is big, let me know when you can send it and I can send you a secure ftp link to upload the document(s).

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Sent: Friday, September 12, 2025 4:38 PM
To: Joan Patrovsky, PMP <jpatrovs@blm.gov>
Cc: Ackerman, James@Energy <james.ackerman@energy.ca.gov>; Abulaban, Abdel-Karim@Energy <Abdel-Karim.Abulaban@energy.ca.gov>; DeLano, Kevin@Energy <Kevin.DeLano@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>; Chang, Kaycee@Energy <kaycee.chang@energy.ca.gov>
Subject: Fw: Groundwater Test Well Report, Soda Mountain Solar Project

Hi Joan,

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1. Panorama Environmental, Inc., 2014. Groundwater Well Test Report. November.
2. Diaz-Yourman and Associates. 2010. Preliminary Geotechnical Investigation (Phase 1A), Caithness Soda Mountain Solar Facility Project, Baker, San Bernardino County, California. December 2010
3. Terra Physics, 2010. Geophysical Characterization of Subsurface Physical Properties, Caithness LLC—Soda Mountain Solar Facility, Southwest of Baker, San Bernardino County, California, dated December 10, 2010, Project No. 09-63, 58 p. Prepared for Wilson Geosciences, December 2011.

Staff are particularly interested in the Panorama report we want to see the actual aquifer testing results, not just a description, which the applicant provided.

Thanks,

Lisa Worrall
Senior Environmental Planner
CEQA Project Management Unit
Siting, Transmission and Environmental Protection Division (STEP)

715 P Street, MS-40, Sacramento, CA 95814
1-916-661-8367

California Energy Commission
Website: www.energy.ca.gov

From: Ackerman, James@Energy <james.ackerman@energy.ca.gov>
Sent: Thursday, September 11, 2025 3:07 PM
To: Worrall, Lisa@Energy <Lisa.Worrall@energy.ca.gov>
Subject: Groundwater Test Well Report, Soda Mountain Solar Project

Lisa: This is the reference I was referring to:

Panorama Environmental, Inc., 2014. Groundwater Well Test Report. November.

It was only cited in the water resources section of the previous FEIR, so perhaps the BLM has a copy.

James Ackerman, PG #6493
Engineering Geologist
California Energy Commission
Siting, Transmission and Environmental Protection Division

Direct: (530) 878-4966
Email: james.ackerman@energy.ca.gov



From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 9/18/2025 10:59:49 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Hannah Arkin [hannah@resolutionenvironmental.com]; Larson, William@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7d9e60624bc84728ab89022ad74408dc-aff4008d-d8]; Roger Hatheway [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=320e3daadd884f89bba45f499c3e8612-f57fd1cf-d6]; Roark, Gabriel@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ed87ff1e22cd49f3aaff644c82538d46-Roark, Gabr]; Lauren DeOliveira [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=59b95046bca34d92ac4e6f09cfc85b02-e4a00264-59]; Fooks, Brett@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=870df74143964b71ada0039bf13c5a9a-Fooks, Bret]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
CC: Breana Campbell [bcampbell@rinconconsultants.com]

Subject: Following: Soda Mountain- Cultural surveys for access road via Zzyzx
Location: Microsoft Teams Meeting

Start: 9/25/2025 4:00:00 PM
End: 9/25/2025 5:00:00 PM
Show Time As: Free

Recurrence: (none)
Required Attendees: Hannah Arkin; Larson, William@Energy; Roger Hatheway; Roark, Gabriel@Energy; Lauren DeOliveira; Fooks, Brett@Energy; Knight, Eric@Energy; Chang, Kaycee@Energy
Optional Attendees: Breana Campbell

The applicant would like to meet to discuss the following:

Would it be possible to set a meeting to discuss the cultural resources and geotechnical report schedules, given the delays BLM is experiencing nationally? We would like to discuss ways we can continue to move the project forward, without falling out of the 270-day timeline, while concurrently understanding the BLM on a national level is facing significant delays in project authorizations - such as the required Field Work Authorization for the CEC's requested cultural resources survey.

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 280 067 284 193 4

Passcode: NL39bQ7t

Dial in by phone

+1 916-562-1816,,841466350# United States, Sacramento

Find a local number

Phone conference ID: 841 466 350#

For organizers: Meeting options | Reset dial-in PIN

From: Patrovsky, Joan E [jpatrovs@blm.gov]
Sent: 8/28/2025 6:55:52 PM
To: lisa worrll [lworrll@energy.state.ca.us]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]
CC: Stamer, Marc R [mstamer@blm.gov]
Subject: BLM & CEC - Soda Mtn Solar Project Amendment
Attachments: IM Department Review of Solar and Wind.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good day Lisa and Karcee,

The Bureau of Land Management (BLM) greatly appreciates our ongoing interagency coordination regarding the proposed Soda Mountain Solar Project.

BLM Field Manager Marc Stamer and I would like to schedule a call with you to discuss the status of the amendment application filed, as well as our perspective on the NEPA schedule.

As you may be aware, the Administration—through recent Executive Orders and Department of the Interior (DOI) guidance—has established new procedures for renewable energy projects. Please see the attached memorandum outlining updated requirements for wind and solar projects. Under this direction, all such projects must undergo additional review by the DOI prior to further processing.

We would like to propose a 30-minute call on **Thursday, September 4**. Please let us know your availability.

Best regards,

Joan Patrovsky, PMP
Project Manager
U.S. Department of the Interior - Region 8 and 10
Bureau of Land Management
California Desert District Office



"What you do today can improve all your tomorrows."- Ralph Marston

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United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

JULY 15 2025

Memorandum

To: Assistant Secretaries
Bureau and Office Heads

From: Deputy Chief of Staff – Policy

GREGORY WISCHER
Digitally signed by GREGORY WISCHER
Date: 2025.07.15 10:58:31 -04'00'

Subject: Departmental Review Procedures for Decisions, Actions, Consultations, and Other Undertakings Related to Wind and Solar Energy Facilities

Consistent with Executive Order (EO) 14315, entitled "Ending Market Distorting Subsidies for Unreliable, Foreign-Controlled Energy Sources," EO 14156, entitled "Declaring a National Energy Emergency," Presidential Memorandum, entitled "Temporary Withdrawal of All Areas on the Outer Continental Shelf from Offshore Wind Leasing and Review of the Federal Government's Leasing and Permitting Practices for Wind Projects," Secretary's Order (SO) 3417, entitled "Addressing the National Energy Emergency," and SO 3418, entitled "Unleashing American Energy," all decisions, actions, consultations, and other undertakings—including but not limited to the following—related to wind and solar energy facilities shall require submission to the Office of the Executive Secretariat and Regulatory Affairs, subsequent review by the Office of the Deputy Secretary, and final review by the Office of the Secretary:

1. *Federal Register* notices;
2. notices to proceed;
3. scoping reports;
4. determinations of National Environmental Policy Act (NEPA) adequacy;
5. draft and final environmental assessments;
6. draft, final, and supplemental environmental impact statements;
7. findings of no significant impact;
8. records of decision;
9. approval letters;
10. plans of development;
11. land use plan amendments and revisions;
12. land withdrawals and revocations;
13. areas of critical environmental concern designations;
14. site testing and monitoring authorizations;

15. proposed and final sale notices;
16. lease sales;
17. lease assignments;
18. lease issuances;
19. proofs of construction;
20. site assessment plans;
21. preconstruction environmental surveys;
22. supplemental environmental reports;
23. temporary use permits;
24. access road authorizations;
25. utility corridor concurrences;
26. facility design reports;
27. fabrication and installation reports;
28. certified verification agent approvals;
29. construction and operation plans (COPs);
30. conditions of COP approvals;
31. COP revisions;
32. Engineering and Technical Review Branch recommendation memos;
33. proposed technical and navigational and aviation safety conditions;
34. cable burial risk assessments;
35. oil spill response plans;
36. decommissioning applications;
37. Outer Continental Shelf Lands Act compliance memos;
38. compendium reports;
39. memoranda of agreement;
40. compensatory mitigation plans;
41. historic properties management plans;
42. historic properties treatment plans;
43. performance and reclamation bonding approvals;
44. rental and royalty determinations;
45. cost recovery agreements;
46. financial assurances;
47. rights-of-use and easement;
48. right-of-way (ROW) applications;

49. ROW grants;
50. ROW leases;
51. ROW transfers;
52. leases and ROWs on Tribal lands;
53. Tribal environmental impact reviews;
54. government-to-government Tribal consultations;
55. Wild and Scenic Rivers Act determinations;
56. National Trails System impact evaluations;
57. National Landscape Conservation System coordination;
58. visual impact assessments;
59. visual resource management analyses;
60. cumulative historic resources visual effects analyses;
61. cultural resource consultations;
62. section 106 compliance under the National Historic Preservation Act;
63. consultation under the Magnuson-Stevens Fishery Conservation and Management Act, Endangered Species Act (ESA), Migratory Bird Treaty Act (MBTA), and Bald and Golden Eagle Protection Act (BGEPA);
64. permits under the ESA, MBTA, and BGEPA;
65. biological assessments;
66. biological opinions;
67. approval and publication of studies and assessments, including ecological baseline studies;
68. grants; and
69. any other similar or related decisions, actions, consultations, or undertakings.

These review procedures are effectively immediately.

Cc: Deputy Assistant Secretaries
Bureau and Office Deputy Heads
Assistant Secretary Chiefs of Staff
Bureau and Office Chiefs of Staff

From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 9/30/2025 9:29:48 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Ackerman, James@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3cc35de240cf4253af9cc7d3d2cbb643-Ackerman, J]; DeLano, Kevin@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=de745a362d214bfbb777e8fd9d9193da-5e9a22f8-24]; Chris Huntley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=018948a34a3149c4a3833144594ae8b3-ff2eee5c-df]; Crisp, Ann@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b89c4de7ece742679d19e1e3ee713dc2-Crisp, Ann@]; Hannah Arkin [hannah@resolutionenvironmental.com]; Luo, Yiming@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=f5df6732dbcf4fd3a7bc7639e421be64-d849b685-c5]
CC: Hughes, Joseph@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7dd5e80572b644209e9607ba7bdcb630-Hughes, Jos]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Shirley Innecken [Shirley.Innecken@swca.com]; Dustin Thaler [dut@vcrenewables.com]; Matthew DeFreese [Matthew.DeFreese@swca.com]; Aramis Respall [Aramis.Respall@swca.com]
Subject: Soda Mountain- Stormwater flow with Project
Location: Microsoft Teams Meeting

Start: 10/13/2025 4:00:00 PM
End: 10/13/2025 5:00:00 PM
Show Time As: Tentative

Recurrence: (none)
Required Attendees: Ackerman, James@Energy; DeLano, Kevin@Energy; Chris Huntley; Crisp, Ann@Energy; Hannah Arkin; Luo, Yiming@Energy
Optional Attendees: Hughes, Joseph@Energy; Knight, Eric@Energy; Chang, Kaycee@Energy; Shirley Innecken; Dustin Thaler; Matthew DeFreese; Aramis Respall

We would like to meet to better understand stormwater flow through the project site with all the stormwater protection and project in place.

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 261 740 958 816 7

Passcode: Er2KD9mn

Dial in by phone

+1 916-562-1816,,450428510# United States, Sacramento

Find a local number

Phone conference ID: 450 428 510#

For organizers: Meeting options | Reset dial-in PIN

From: Worrall, Lisa@Energy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4BBC7048B38485084BDB03FB494B25B-WORRALL, LI]
Sent: 9/24/2025 6:24:21 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Donnell, Julie A [jdonnell@blm.gov]; Joan Patrovsky, PMP [jpatrovs@blm.gov]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]
CC: Haws, Marichka@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=952e0b50c8ae422588958c273050b0b0-Haws, Maric]

Subject: Soda Mountain BLM CEC Coordination
Location: Microsoft Teams Meeting

Start: 9/24/2025 10:00:00 PM
End: 9/24/2025 10:30:00 PM
Show Time As: Busy

Recurrence: (none)
Required Attendees: Donnell, Julie A; Joan Patrovsky, PMP; Chang, Kaycee@Energy; Knight, Eric@Energy
Optional Attendees: Haws, Marichka@Energy

Today's meeting will be just 30 mins, but the next meeting can go back to an hour.
Questions from CEC staff:

1. Status of Applicant's cultural survey request on new access road of Zzyzx.
2. ROW Grant- based on project boundaries only or also use of land?

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 249 898 311 150 2

Passcode: yp6FX25o

Dial in by phone

+1 916-562-1816,,570344763# United States, Sacramento

Find a local number

Phone conference ID: 570 344 763#

For organizers: Meeting options | Reset dial-in PIN

From: Hannah Arkin [hannah@resolutionenvironmental.com]
Sent: 9/2/2025 3:45:11 PM
To: Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]
Subject: Soda Mt. Solar Shape Files
Attachments: ProjectData_20250828.zip

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Lisa, Kaycee and Eric,

Thank you for a wonderful site visit and NOP Scoping Meeting on Friday. We appreciate all you are doing to help process this project!

Attached are the GIS/Shape files for the Project Impact/Mitigation Memo and the Bighorn Sheep Buffer. If you would like to connect GIS teams to help resolve any questions, please don't hesitate to let me know.

On a different topic - would it be possible for me to attend the next CEC/BLM meeting? I think if a representative from the Applicant team is present during these conversations it would help reduce some miscommunications.

Thank you!
Hannah

Hannah Arkin

CEO

Resolution Environmental

262 B Avenue, Coronado, CA 92118

760-504-4109

From: Patrovsky, Joan E [jpatrovs@blm.gov]
Sent: 9/2/2025 10:06:53 PM
To: Worrall, Lisa@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e4bbc7048b38485084bdb03fb494b25b-Worrall, Li]; Chang, Kaycee@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dd3d2fc8670840bda4acdc455903e787-Chang, Kayc]; Knight, Eric@Energy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=be42548337f44852a291a9845f226f62-Knight, Eri]
CC: Stamer, Marc R [mstamer@blm.gov]; Cordes, Isabeau J [icordes@blm.gov]; Donnell, Julie A [jdonnell@blm.gov]
Subject: Secretarial Order 3438 - DOI Renewable Energy
Attachments: SO 3438 - Managing Federal Energy Resources and Protecting the Environment 1 (1).pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good day Lisa, Kaycee and Eric,

In advance of our meeting this Thursday at 2:00 pm, the bureau wishes to share this Secretarial Order which affects the Soda Mountain Solar project along with pending renewable applications.

We wanted to ensure you were aware. We look forward to our meeting.

Sincerely,
Joan Patrovsky, PMP
Project Manager
U.S. Department of the Interior - Region 8 and 10
Bureau of Land Management
California Desert District Office

"What you do today can improve all your tomorrows."- Ralph Marston

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THE SECRETARY OF THE INTERIOR
WASHINGTON

ORDER NO. 3438

Subject: Managing Federal Energy Resources and Protecting the Environment

Sec. 1. **Purpose**. This Order directs the Department of the Interior (Department), consistent with the Federal Land Policy and Management Act (FLPMA) and the Outer Continental Shelf Lands Act (OSCLA), to optimize the use of lands under its direct management, including the Outer Continental Shelf, (hereafter referred to collectively as "Federal lands") by considering, when reviewing a proposed energy project under the National Environmental Policy Act (NEPA), a reasonable range of alternatives that includes projects with capacity densities meeting or exceeding that of the proposed project. For the purposes of this Order, capacity density is defined as the nameplate generation capacity of an energy project multiplied by its projected capacity factor, the product of which is then divided by the total acres of the project area. Ultimately, FLPMA's multiple use mandate for onshore lands, OCSLA's multiple requirements for offshore activities, and NEPA's requirement to consider reasonable alternatives to a proposed action give rise to the question on whether the use of Federal lands for *any* wind and solar projects is consistent with the law, given these projects' encumbrance on other land uses, as well as their disproportionate land use when reasonable project alternatives with higher capacity densities are technically and economically feasible. This Order is consistent with Executive Order (EO) 14156, entitled "Declaring a National Energy Emergency," which directs the Department to exercise its authorities "to facilitate the identification, leasing, siting, production, transportation, refining, and generation of domestic energy resources, including, but not limited to, on Federal lands," and EO 14315, entitled "Ending Market Distorting Subsidies for Unreliable, Foreign-Controlled Energy Sources," which finds, "The proliferation of [wind and solar] projects displaces affordable, reliable, dispatchable domestic energy sources, compromises our electric grid, and denigrates the beauty of our Nation's natural landscape."

Sec. 2. **Authorities**. This Order is issued under the authority of section 2 of the Reorganization Plan No. 3 of 1950 (64 Stat. 1262), as amended; FLPMA (43 U.S.C. §§ 1701 *et seq.*); OCSLA (43 U.S.C. §§ 1331 *et seq.*); NEPA (42 U.S.C. §§ 4331 *et seq.*); EO 14156; and EO 14315.

Sec. 3. **Background**. The Department, via the Bureau of Land Management (BLM), manages 245 million surface acres, which is approximately one-tenth of our Nation's land base. Additionally, the Department manages 3.2 *billion* acres on the Outer Continental Shelf. Under FLPMA, the BLM must manage Federal lands in accordance with multiple use. Specifically, the BLM shall make "the most judicious use of the land for some or all of these resources" and consider "the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values." 43 U.S.C. § 1702(c). Similarly, under OCSLA, the Secretary must ensure that any activity on the Outer Continental Shelf provides for:

- "safety;"
- "protection of the environment," including fisheries, marine mammals, migratory birds, and bald and golden eagles;
- "conservation of the natural resources of the outer Continental Shelf;"
- "coordination with relevant Federal agencies," including the U.S. Department of Defense, the U.S. Department of Transportation, and the U.S. Department of Commerce;
- "protection of national security interests of the United States," including impacts on airports;
- "prevention of interference with reasonable uses," including commercial fishing; and
- "consideration of…any other use of the sea or seabed, including use for a fishery, a sealane, a potential site of a deepwater port, or navigation [.]" 43 U.S.C. § 1337(p)(4).

To ensure the Department optimizes the use of its Federal lands in accordance with these statutes and to "attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences" as directed by NEPA, 42 U.S.C. § 1331(b), the Department shall consider energy projects' capacity density in its decision-making, including when considering reasonable alternatives to a proposed energy project. Capacity density is a technology-neutral, objective calculation of how efficiently land is used for energy generation. Simply put, higher capacity density means greater energy generation with less impact to Federal lands. Because energy projects with higher capacity densities have lower Federal land use impacts and therefore disturb far less of the natural environment for fish, birds, and other wildlife, they provide more Federal lands for other uses, fulfilling FLPMA's multiple use mandate and OCSLA's multiple requirements for offshore activities. Moreover, consideration of a project's capacity density better informs the Department and the public of a project's potential environmental impact and energy generation.

Based on common sense, arithmetic, and physics, wind and solar projects are highly inefficient uses of Federal lands. On a technology-neutral basis, wind and solar projects use disproportionate Federal lands relative to their energy generation when compared to other energy sources, like nuclear, gas, and coal. For instance, based on data from the U.S. Energy Information Administration, one advanced nuclear plant (2 x AP1000) produces 33.17 megawatts (MW) per acre, while one offshore wind farm produces approximately 0.006 MW/acre, which is approximately 5,500 times less efficient than one nuclear plant. *See* Appendix. Thus, when there are reasonable alternatives that can generate the same amount of or more energy on far less Federal land, wind and solar projects may unnecessarily and unduly degrade Federal lands.

Considering capacity densities in the Department's decision-making process, including when assessing alternatives to a proposed energy project, also addresses the artificially stimulated proliferation of intermittent energy sources, namely wind and solar projects, as identified by EO 14315. Such proliferation has displaced dispatchable energy sources and destabilized our electric grid, leading President Trump to declare a national energy emergency due to the unusual and extraordinary threat to our Nation's economy, national security, and foreign policy posed by the Nation's insufficient energy production, transportation, refining, and generation. As the U.S. Department of Energy's report titled "Evaluating the Reliability and Security of the United States

Electric Grid," (July 2025) notes, the Nation's energy grid outlook has been undermined by "the accelerated retirement of existing [baseload] generation capacity and the insufficient pace of firm, dispatchable generation additions (partly due to a recent focus on intermittent rather than dispatchable sources of energy)."

Sec. 4. **Directives**. Consistent with the aforementioned statutory authorities, the Department shall only permit those energy projects that are the most appropriate land use when compared to a reasonable range of project alternatives.

To implement this directive and to the extent that the following information is not already requested by Secretary's Order 3437, titled "Ending Preferential Treatment for Unreliable, Foreign-Controlled Energy Sources in Department Decision-Making," the Department shall identify and make the necessary revisions, as appropriate and consistent with applicable law, to any regulations, guidance, policies, or practices, necessary to implement this directive.

a. Within 30 days of the issuance of this Order, each Assistant Secretary, in coordination with the Solicitor, shall submit a report to the Office of the Secretary a list of the actions taken and to be taken to implement this directive,

b. Within 60 days of the issuance of this Order, the Office of the Secretary, in coordination with the Deputy Secretary, the Solicitor, and each Assistant Secretary, shall submit to me a report on the actions taken and to be taken to implement this directive.

Sec. 5. **Implementation**. The Office of the Secretary is responsible for implementing all aspects of this Order, in coordination with the Deputy Secretary, the Solicitor, and applicable Assistant Secretaries or their equivalents.

Sec. 6. **Effect of This Order**. This Order is intended to improve the internal management of the Department; to comply with FLPMA, OCSLA, and NEPA; and to implement EO 14156 and EO 14315. This Order and any resulting reports or recommendations are not intended to, and do not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its departments, agencies, instrumentalities or entities, its officers or employees, or any other person. To the extent there is any inconsistency between the provisions of this Order and any Federal laws or regulations, the laws or regulations will control.

Sec. 7. **Effective Date**. This Order is effective immediately and will remain in effect until it is amended, superseded, or revoked, whichever occurs first.

Secretary of the Interior

Date:
Aug 1st, 2025

APPENDIX 1

Energy Type[a]	Capacity Density (MW/Acre)	Different Energy Types' Capacity Densities Compared to…		
		Solar PV with Single-Axis Tracking	Onshore Wind	Offshore Wind
Advanced Nuclear Plan (2 x AP1000)	33.17	945	2686	5402
Combined Cycle Plant 2x2x1	24.42	696	1977	3977
Small Modular Reactor Nuclear Power Plant	12.66	361	1025	2062
Combined Cycle Plant 1x1x1, Single Shaft	12.48	355	1010	2032
Combined Cycle Plant 1x1x1, Single Shaft, with 95% Carbon Capture	5.40	154	438	880
Combustion Turbine – Simple Cycle Plant (H-class)	4.23	121	343	689
Combustion Turbine – Simple Cycle Plant (Aeroderivative)	2.13	61	173	347
Ultra-Supercritical Coal Plant without Carbon Capture	0.69	20	56	113
Ultra-Supercritical Coal Plant with 95% Carbon Capture	0.64	18	52	105
Geothermal	0.16	4.63	13	26
Solar PV with Single-Axis Tracking and AC-Coupled Battery Storage	0.04	1.16	3	7
Solar PV with Single-Axis Tracking with DC-Coupled Battery Storage	0.04	1.03	3	6
Solar PV with Single-Axis Tracking	0.04	-	3	6
Onshore Wind[b]	0.01	0.35	-	2
Offshore Wind[c]	0.006	0.17	0.5	-

[a] For all energy types other than onshore and offshore wind, the capacity density was calculated using data from the U.S. Energy Information Administration, U.S. Department of Energy, "Capital Cost and Performance Characteristics for Utility-Scale Electric Power Generating Technologies," January 2024, 5-6, 15, 21, 27, 34, 41-42, 48, 63, 67-68, 73, 98, 103-104, 109, https://www.eia.gov/analysis/studies/powerplants/capitalcost/pdf/capital_cost_AEO2025.pdf; and "Table 6.07.A. Capacity Factors for Utility Scale Generators Primarily Using Fossil Fuels," 2024 annual data, U.S. Energy Information Administration, U.S. Department of Energy, accessed July 31, 2025, https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=table_6_07_a.

[b] To calculate the capacity density for onshore wind, the midpoint of 4.1 - 13.7 MW/km^2 (0.0166 - 0.0555 MW/acre), or 0.036 MW/acre, was used. This number was then multiplied by a capacity factor of 34.3 percent, with the product being approximately 0.01 MW/acre. See Trieu Mai et al., "Land of Opportunity: Potential for Renewable Energy on Federal Lands," National Renewable Energy Laboratory, Office of Energy Efficiency and Renewable Energy, U.S. Department of Energy, January 2025, 25, https://docs.nrel.gov/docs/fy25osti/91848.pdf; and "Table 6.07.B. Capacity Factors for Utility Scale Generators Primarily Using Non-Fossil Fuels," 2024 annual data, U.S. Energy Information Administration, U.S. Department of Energy, accessed July 31, 2025, https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=table_6_07_b.

[c] To calculate the capacity density for offshore wind, 4.42 MW/km^2 was used and converted to 0.0179 MW/acre and then multiplied by a capacity factor of 34.3 percent. See Daniel Mulas Hernando et al., "Summary Analysis of Different Offshore Wind Capacity Density Drivers in Proposed U.S. Projects and Impacts on Progress Towards State and Federal Deployment Targets," National Renewable Energy Laboratory, Office of Energy Efficiency and Renewable Energy, U.S. Department of Energy, October 2023, 9, https://docs.nrel.gov/docs/fy24osti/87947.pdf; and "Table 6.07.B. Capacity Factors for Utility Scale Generators Primarily Using Non-Fossil Fuels," 2024 annual data, U.S. Energy Information Administration, U.S. Department of Energy, accessed July 31, 2025, https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=table_6_07_b.