

**APPENDIX E**

**RELATIONSHIP BETWEEN THE DESERT QUARTZITE SOLAR PROJECT  
PA/EIS/EIR AND THE DESERT RENEWABLE ENERGY CONSERVATION PLAN  
AND CONFORMANCE WITH CONSERVATION AND MANAGEMENT ACTIONS**

## **APPENDIX E - RELATIONSHIP BETWEEN THE DESERT QUARTZITE SOLAR PROJECT PA/EIS/EIR AND THE DESERT RENEWABLE ENERGY CONSERVATION PLAN AND CONFORMANCE WITH CONSERVATION AND MANAGEMENT ACTIONS**

### **1.0 Introduction**

The Bureau of Land Management (BLM) issued the Desert Renewable Energy Conservation Plan (DRECP) in October, 2016. The DRECP amends the California Desert Conservation Area (CDCA) Plan, specifically with respect to natural resource conservation and renewable energy development. The DRECP provides a new framework under which lands in the CDCA are managed for resource conservation, and under which new applications for renewable energy projects are considered and evaluated.

Although the new framework is now in place as of October, 2016, the new management prescriptions are not applicable to the Desert Quartzite Solar Project (DQSP, or the Project), or to the analysis of the DQSP in this Environmental Impact Statement/Environmental Impact Report (EIS/EIR), for two reasons:

- According to the DRECP, renewable energy applications in the Riverside East Solar Energy Zone filed before June 30, 2009, including the application for DQSP, are not, and will not be, subject to the terms of the DRECP. The DRECP recognizes that the DQSP would not be subject to the DRECP due to its status as a “pending” right-of-way (ROW) application under the Western Solar Plan and its location within a SEZ (DRECP Section II.3.2.4, p. 68-69).
- The data collection, field surveys, and impact analyses for this EIS/EIR are based on BLM’s requirements as of the date of the Notice of Intent, which was on March 6, 2015. The DRECP’s designations and classifications were not issued until 18 months later.

Based on these factors, this EIS/EIR has been based on the management framework that was available under the CDCA Plan, and on BLM’s renewable energy siting, data collection, and impact analysis requirements that were in place as of March 6, 2015. However, BLM has also considered and evaluated the effects of the DRECP changes on the impact analysis. The purpose of this Appendix is to summarize the changes that occurred under the DRECP, and to discuss how these changes would, or would not, have affected the impact analysis if the analysis had been performed under the new DRECP requirements.

### **2.0 BLM Land Use Allocations**

One major effect of the DRECP was to modify BLM’s land management use allocations that were operative under the CDCA Plan prior to October, 2016. These included:

- The Multiple-Use Classes (MUCs) that were previously in effect under the CDCA Plan, as well as previous land use allocations made for resource protection, including Areas of Critical Environmental Concern (ACECs) and Desert Wildlife Management Areas (DWMAs), have been replaced by a new classification system. Under the DRECP, land use allocations are now categorized as Development Focus Areas (DFAs), Variance

Process Lands (VPLs), General Public Lands, and Resource Conservation Areas. Lands have also been designated for recreation purposes.

- Under the previous CDCA Plan, no Visual Resource Management (VRM) classes had been established in the CDCA, and the designation and adoption of Interim VRM classes in response to a specific project was a BLM Field Office Manager decision. The DRECP has now established VRM Classes for the entire CDCA, including the Project area.

While these changes do not affect the physical resources on and around the DQSP site, they do affect how those resources are managed. The affected environment in which the DQSP is proposed (discussed in Chapter 3 of the EIS/EIR) includes physical resources such as wildlife and water resources. The analysis of Project impacts in Chapter 4 is, for some resources, based only on the direct impact of the Project on that physical resource. For instance, Section 4.3 quantifies the number of individuals of each special-status plant species that would be removed under each alternative. However, the impact analysis for other resources is based on how the Project conforms to BLM's requirements for management of that resource. For example, while Section 4.5 quantifies the impact of the Project on cultural resources, Section 4.16 evaluates the impact of the Project on the Mule Mountain ACEC, which was established for the protection of cultural resources. In this way, the EIS/EIR evaluates both the effect of the Project on a resource, as well as the effect of the Project on the status or management goals of an area established for protection of that resource. It is the status and management goals of these areas that have changed under the DRECP.

The DRECP does not affect how the EIS/EIR evaluates physical impacts to physical resources, but it does affect how the EIS/EIR evaluates impacts to land use status or management goals. Because the Project is not subject to DRECP, or to BLM's land use allocation changes made after March 6, 2015, the analysis of the impact of the Project on land use status or management goals is based on the land use status and management goals that were in place on March 6, 2015. The following subsections summarize the land use allocations that have changed, and how the changes do, or do not, affect the impact analysis in the EIS/EIR.

## **2.1 Onsite and Adjacent Land Use Allocations**

Under the CDCA Plan, the Project area was designated as Multiple Use Class – Moderate (MUC-M). Section 4.10 of the EIS/EIR evaluates the conformance of the Project with this classification. In the DRECP, the Project site is designated as a DFA, which is an area where activities associated with solar, wind, and geothermal energy are allowed, streamlined, and incentivized. Because solar projects are allowed on DFA lands, the Project is in conformance with this new land use allocation.

Under the CDCA Plan, there was no formal VRM classification of the Project site, but the BLM Field Office Manager had assigned a Class III Interim VRM Objective to the site. Section 4.19 of the EIS/EIR evaluates the conformance of the Project with this classification. The DRECP designates the Project area as VRM Class IV. VRM Class IV allows for management activities and uses requiring major modifications to the natural landscape, while the objective of VRM Class III class is to partially retain the existing character of the landscape, and the level of change to characteristic landscape should be moderate. As a result, the analysis of the Project in Section 4.19 evaluates the Project against a more restrictive management objective, and is therefore an overly conservative analysis as compared to the analysis that would occur under the DRECP.

Under the CDCA Plan, there were no resource protection allocations, such as ACECs, DWMA, Wilderness Areas, or Lands Managed for Wilderness Characteristics on the site. There were also no formal recreation designations for the site. Similarly, under the DRECP, no resource conservation or recreation designations have been made for the site, so no changes in impact analyses would have been needed in these areas.

## 2.2 Nearby Land Use Allocations

Under the CDCA Plan, land use allocations in the vicinity of the Project were designated according to the MUC system. The directly adjacent lands were designated the same as the Project site, as MUC-M. MUC-Limited (MUC-L) and MUC-Intensive (MUC-I) lands are also present in the Project vicinity. Section 4.10 of the EIS/EIR evaluated the impact of the Project within the context of the overall amount of MUC-M land within the Project vicinity. Under DRECP, the distinction between MUC-M, MUC-I, and MUC-L on the lands in the vicinity of the Project no longer exists. Instead, almost all lands have been designated for resource conservation, development, and/or recreation. Therefore, there is no correlative analysis under the DRECP. Although the analysis of the Project within the context of the MUC system is moot under the DRECP, there is no other analysis that would have been needed to be performed in its place.

Under both the CDCA Plan and DRECP, lands have been designated for resource conservation purposes. Section 3.16 of the EIS/EIR identified the locations of nearby areas designated for resource conservation, including ACECs, DWMA, Wilderness Areas, Lands With Wilderness Characteristics, and Back Country By-Ways. In that analysis, the closest lands under each category were as follows:

- The closest ACEC was the Mule Mountains ACEC, designated for protection of cultural resources, one mile southwest of the Project;
- The closest DWMA was the Chuckwalla DWMA, designated for protection of the desert tortoise, approximately five miles west of the Project;
- The closest Wilderness Area was the Palo Verde Mountains, located more than 10 miles from the Project;
- The nearest land found to have wilderness characteristics was located on the eastern end of the Little Chuckwalla Mountains Wilderness Area, approximately 10 miles southwest of the Project site; and
- The nearest Back Country By-Way was the Bradshaw Trail, located four miles southwest of the Project.

Section 4.16 evaluated the impact of the Project on the designation status and management objectives of each of these areas. Section 4.4 evaluated the impact of the Project on wildlife in the ACECs and DWMA, and Section 4.5 evaluated the direct and indirect impact of the Project on cultural resources, including those in the Mule Mountains ACEC. Section 4.14 evaluated the impact of the Project on recreation in these specially designated areas.

Under the DRECP, the boundaries of some of these areas have changed. The largest change, and that closest to the Project site, is that several of the ACECs west of the project, including the Mule Mountains ACEC, have been expanded and combined into a single ACEC. However, the change in the boundary was to the west, away from the Project area. None of the newly

designated areas is located closer to the Project site than was the case under the CDCA Plan prior to October, 2016. There are no newly designated areas (under the DRECP) that would be impacted but are left unevaluated.

Under both the CDCA Plan and the DRECP, lands have been designated for recreation purposes. Section 4.14 of the EIS/EIR evaluated the impact of the Project on general recreation on BLM land, including OHV access to recreation areas, as well as on City of Blythe parks and recreation facilities. None of the general recreation opportunities or City of Blythe facilities have been changed as a result of the DRECP.

Section 3.14 identified the locations of nearby areas specially designated for recreation, including the Mule Mountains and Midland Long-Term Visitor Areas (LTVAs), campgrounds, and the Bradshaw Trail. Impacts to these areas were evaluated in Section 4.14. Under the DRECP, the new land use allocations included designation of both the Mule Mountains and Midland LTVAs as SRMAs. However, the boundaries or management objectives of these areas were not changed in a way that would make the current impact analysis inapplicable.

### **3.0 Conservation and Management Actions**

The second major component of the DRECP was the implementation of Conservation and Management Actions (CMAs), which include a variety of project siting, impact mitigation, and BLM management requirements. CMAs were developed on a Land Use Plan Area (LUPA) - Wide basis, as well as specifically for Conservation Lands, DFAs, VPLs, and lands used for power transmission.

Because the DQSP is exempted from the DRECP, the CMAs are not applicable to the Project. However, to ensure that the impact analysis is complete, and resources are protected to the maximum extent practicable, BLM has performed an applicability analysis of the Project with respect to the CMAs. Because the Project is located wholly on DFA lands and includes transmission, the CMAs evaluated were those included in the LUPA-Wide, DFA, DFA/VPL, and TRANS categories.

The analysis, presented in Table B-1, includes a determination of whether the CMA would have applied to the project, if the Project had been subject to the DRECP. This includes an evaluation of whether the type of action covered by the CMA is within the scope of the Project, i.e., approval of a solar energy project. In addition, it includes a determination of whether the resource addressed by the CMA is present, or potentially impacted, on the Project site.

Following the applicability determination, the analysis included an evaluation of the design of the Project, the scope of the Applicant's field surveys and technical analyses, the Applicant's Proposed Measures, and the preliminary mitigation measures developed by the agencies with respect to each CMA. The evaluation was performed to verify that the resource conservation objectives of each CMA were met, whether changes could be made to Project design and technical analysis to improve conformance, and whether changes could be made to the preliminary mitigation measures, within the limitation that the Project is not legally subject to the CMAs.

In general, the analysis revealed that the Project design and/or mitigation measures satisfy applicable CMAs. In many cases, wording changes were made to mitigation measures to bring the language into line with the CMA language. In cases where no such changes are made, the

analysis describes why the Applicant is not required to modify the Project or mitigate potential impacts, or why the CMA does not apply.

#### **4.0 Datasets**

Another effect of the approval of the DRECP is that it based its analysis on region-wide datasets for identification of potentially-affected resources, and required use of these datasets by future Applicants. This included mapping of habitat and migration corridors for various wildlife and plant species. Many of the CMAs were, in turn, based on the relationship of the Project to the resources as they were presented in the datasets.

In general, the datasets used by the DRECP have no effect on the analysis of the Project in the EIS/EIR. However, the difference in datasets was an issue for the analysis of sand dune vegetation impacts. For the DRECP, broad scale mapping of vegetation alliances was done by California Department of Fish and Wildlife (CDFW). The vegetation classification for the DRECP follows Federal Geographic Data Committee (FGDC) and National Vegetation Classification Standards (NVCS). In contrast, for the analysis in this EIS/EIR, the vegetation was mapped as vegetation communities, on a site-specific basis, by the Applicant under direction from BLM. Vegetation communities were characterized by the classification system used by Holland (1986) and the NECO Plan Amendment to the CDCA Plan (Evens and Hartman 2007), and cross-referenced with *A Manual of California Vegetation* (Sawyer and Keeler-Wolf 2009), where appropriate.

To address this discrepancy, the text in Section 3.3.1.1 discusses the relationship between the two different systems, as well as the advantages and disadvantages of the use of each in the EIS/EIR analysis. The text also describes how the onsite mapping is correlated to the DRECP mapping, thus allowing evaluation of the conformance of the Project and EIS/EIR with the vegetation-specific CMAs. In reviewing these differences, BLM believes that the method used in the EIS/EIR adequately addresses the data needed to adequately conduct impact analysis of this resource.

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-1:</b> Conduct a habitat assessment (see Glossary of Terms) of Focus and BLM Special Status Species' suitable habitat for all activities and identify and/or delineate the DRECP vegetation types, rare alliances, and special features (e.g., Aeolian sand transport resources, Joshua tree, microphyll woodlands, carbon sequestration characteristics, seeps, climate refugia) present using the most current information, data sources, and tools (e.g., DRECP land cover mapping, aerial photos, DRECP species models, and reconnaissance site visits) to identify suitable habitat (see Glossary of Terms) for Focus and BLM Special Status Species. If required by the relevant species specific CMAs, conduct any subsequent protocol or adequate presence/absence surveys to identify species occupancy status and a more detailed mapping of suitable habitat to inform siting and design considerations. If required by relevant species specific CMAs, conduct analysis of percentage of impacts to suitable habitat and modeled suitable habitat.</p> <ul style="list-style-type: none"> <li>BLM will not require protocol surveys in sites determined by the designated biologist to be unviable for occupancy of the species, or if baseline studies inferred absence during the current or previous active season.</li> <li>Utilize the most recent and applicable assessment protocols and guidance documents for vegetation types and jurisdictional waters and wetlands that have been approved by BLM, and the appropriate responsible regulatory agencies, as applicable.</li> </ul>	X			X		
				<p>Survey protocols are described in the BRTR. The protocols and results for vegetation surveys are summarized in Section 3.3.1.2. The protocols and results for wildlife surveys are summarized in Section 3.4.1.1.</p> <p>All surveys were conducted in accordance with protocols in place at the time of the NOI, under the direction of BLM biologists assigned to the Project.</p>		
<p><b>LUPA-BIO-2:</b> 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.</p>	X			X		
				<p>Mitigation Measures VEG-1 through VEG-5 specify the qualifications, duties, and authorities of the Designated Biologist(s) and Monitor(s).</p>		
<p><b>LUPA-BIO-3:</b> 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:</p> <ul style="list-style-type: none"> <li>The edge of each of the DRECP desert vegetation types, including but not limited to those in the riparian or wetland vegetation groups (as defined by alliances within the vegetation type descriptions and mapped based on the vegetation type habitat assessments described in <b>LUPA-BIO-1</b>).</li> <li>The edge of the mapped riparian vegetation or the Federal Emergency Management Agency (FEMA) 100-year floodplain, whichever is greater, for the Mojave River.</li> <li>The edge of the vegetation extent for specified Focus and BLM sensitive plant species.</li> <li>The edge of suitable habitat or active nest substrates for the appropriate Focus and BLM Special Status Species.</li> </ul>	X			X		
				<p>No Alternatives would directly impact the Blue paloverde-Desert Ironwood Alliance. However, the Proposed Action would be situated within the 200 foot setback distance of an area of Blue paloverde-Desert Ironwood Alliance that is located outside of the Project footprint. Alternatives 2 and 3 would be located more than 200 feet away from the Blue paloverde-Desert Ironwood Alliance.</p> <p>Table 4.3-3 shows that all alternatives would directly impact Harwood's eriastrum.</p> <p>Section 4.4.3 discusses impacts of the Proposed Action to the Burrowing owl. The EIS/EIR mitigation measure WIL-9 specifies a setback requirement for Burrowing owl nests (656 feet), as specified in DFA-BIO-IFS-2, Table 22).</p>		
				<p>The resources for which setback distances are established in DRECP CMAs, and which are potentially present in the Proposed Action area, include the Blue paloverde-Desert Ironwood Alliance (within the Madrean Warm Semi-Desert Wash Woodland/Scrub and Sonoran-Coloradan Semi-Desert Wash Woodland/Scrub; 200 foot setback), one BLM Sensitive plant species (Harwood's eriastrum; 0.25 miles), and the Burrowing owl (656 feet).</p> <p>The Project is not located near the Mojave River, so the second bullet does not apply.</p> <p>No Plant Focus species, as defined in Table 23, are present in the Project area.</p> <p>Setback distances for golden eagles and Swainson's hawk do not apply, because no nests were identified within the setback distances. Setback distances for Bendire's thrasher do not apply, because the site was determined to have low potential for this species.</p>		

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	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-4:</b> 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.</p> <p>Species-specific seasonal restriction dates are described in the applicable CMAs.</p> <p>Alternatively, to avoid a seasonal restriction associated with visual disturbance, installation of a visual barrier may be evaluated on a case-by-case basis that will result in the breeding, nesting, lambing, fawning, or roosting species not being affected by visual disturbance from construction activities subject to seasonal restriction. The proposed installation and use of a visual barrier to avoid a species seasonal restriction will be analyzed in the activity/project specific environmental analysis.</p>		X				
	<p>A review of CMAs shows that seasonal restrictions are only required for Mohave ground squirrel (LUPA-BIO-IFS-38) and for birds nesting in vegetation alliances specified in Table 17 (LUPA-BIO-RIPWET-1).</p> <p>Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.</p> <p>The Blue paloverde-Desert Ironwood Alliance (within the Madrean Warm Semi-Desert Wash Woodland/Scrub and Sonoran-Coloradan Semi-Desert Wash Woodland/Scrub specified in Table 17) is present outside in the area, but is avoided by the footprint of all alternatives.</p>					
<p><b>LUPA-BIO-5:</b> All activities, as determined appropriate on an activity-by-activity basis, will implement a worker education program that meets the approval of the BLM. The program will be carried out during all phases of the project (site mobilization, ground disturbance, grading, construction, operation, closure/decommissioning or project abandonment, and restoration/reclamation activities). The worker education program will provide interpretation for non-English speaking workers, and provide the same instruction for new workers prior to their working on site. As appropriate based on the activity, the program will contain information about:</p> <ul style="list-style-type: none"> <li>• Site-specific biological and nonbiological resources.</li> <li>• Information on the legal protection for protected resources and penalties for violation of federal and state laws and administrative sanctions for failure to comply with LUPA CMA requirements intended to protect site-specific biological and nonbiological resources.</li> <li>• The required LUPA and project-specific measures for avoiding and minimizing effects during all project phases, including but not limited to resource setbacks, trash, speed limits, etc. Reporting requirements and measures to follow if protected resources are encountered, including potential work stoppage and requirements for notification of the designated biologist.</li> <li>• Measures that personnel can take to promote the conservation of biological and nonbiological resources.</li> </ul>	Yes	No	Partial	Yes	No	Partial
	X			X		
				<p>Mitigation Measure VEG-6 describes the requirements for the Worker Environmental Awareness Program (WEAP).</p>		

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<p><b>LUPA-BIO-6:</b> Subsidized predator standards, approved by BLM, in coordination with the USFWS and CDFW, will be implemented during all appropriate phases of activities, including but not limited to renewable energy activities, to manage predator food subsidies, water subsidies, and breeding sites including the following:</p> <ul style="list-style-type: none"> <li>• 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 repellent methods to avoid providing perches, nesting sites, and roosting sites for Common Ravens.</li> <li>• The application of water and/or other palliatives for dust abatement in construction areas and during project operations and maintenance will be done with the minimum amount of water necessary to meet safety and air quality standards and in a manner that prevents the formation of puddles, which could attract wildlife and wildlife predators.</li> <li>• Following the most recent national policy and guidance, BLM will take actions to not introduce, dispose of, or release any non- native species into areas of native habitat, suitable habitat, and natural or artificial waterways/water bodies containing native species.</li> <li>• All activity work areas will be kept free of trash and debris. Particular attention will be paid to “micro-trash” (including such small items as screws, nuts, washers, nails, coins, rags, small electrical components, small pieces of plastic, glass or wire, and any debris or trash that is colorful or shiny) and organic waste that may subsidize predators. All trash will be covered, kept in closed containers, or otherwise removed from the project site at the end of each day or at regular intervals prior to periods when workers are not present at the site.</li> </ul> <p>In addition to implementing the measures above on activity sites, each activity will provide compensatory mitigation that contributes to LUPA-wide raven management.</p>	X			X		
					<ul style="list-style-type: none"> <li>• The Raven Management Plan is specified in Mitigation Measure WIL-5.</li> <li>• Mitigation Measure VEG-8 requires that dust control be performed with a minimum amount of water, to avoid formation of puddles.</li> <li>• Applicant-Proposed Measure APM-BIO-5 discusses the Applicant’s Integrated Weed Management Plan, which has been reviewed and approved by the BLM Field Office.</li> <li>• Applicant-Proposed Measure APM-BIO-3 discusses the Construction BMPs, which include measures for managing trash and debris. Additional information is provided in Mitigation Measures VEG-8. However, neither of these measures discusses “micro-trash”.</li> <li>• Mitigation Measure WIL-5 includes compensatory mitigation for the Regional Raven Management Program.</li> </ul>	

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<p><b>LUPA-BIO-7:</b> Where DRECP vegetation types or Focus or BLM Special Status Species habitats may be affected by ground- disturbance and/or vegetation removal during pre-construction, construction, operations, and decommissioning related activities but are not converted by long-term (i.e., more than two years of disturbance, see Glossary of Terms) ground disturbance, restore these areas following the standards, approved by BLM authorized officer, following the most recent BLM policies and procedures for the vegetation community or species habitat disturbance/impacts as appropriate, summarized below:</p> <ul style="list-style-type: none"> <li>• Implement site-specific habitat restoration actions for the areas affected including specifying and using:                             <ul style="list-style-type: none"> <li>• The appropriate seed (e.g., certified weed- free, native, and locally and genetically appropriate seed)</li> <li>• Appropriate soils (e.g., topsoil of the same original type on site or that was previously stored by soil type after being salvaged during excavation and construction activities)</li> <li>• Equipment</li> <li>• Timing (e.g., appropriate season, sufficient rainfall)</li> <li>• Location</li> <li>• Success criteria</li> <li>• Monitoring measures</li> <li>• Contingency measures, relevant for restoration, which includes seeding that follows BLM policy when on BLM administered lands.</li> </ul> </li> <li>• Salvage and relocate cactus, nolina, and yucca from the site prior to disturbance using BLM protocols. To the maximum extent practicable for short-term disturbed areas (see Glossary of Terms), the cactus and yucca will be re-planted back to the original site.</li> <li>• Restore and reclaim short-term (i.e. 2 years or less, see Glossary of Terms) disturbed areas, including pipelines, transmission projects, staging areas, and short-term construction-related roads immediately or during the most biologically appropriate season as determined in the activity/project specific environmental analysis and decision, following completion of construction activities to reduce the amount of habitat converted at any one time and promote recovery to natural habitats and vegetation as well as climate refugia and ecosystem services such carbon storage.</li> </ul>	X			X		
					The Applicant's Revegetation Plan has not yet been submitted. But its components are described throughout the EIS/EIR, including Section 2.3.6 (Decommissioning), 2.3.7.2 (Vegetation Management), 2.3.7.9 (Stormwater Management), Applicant-Proposed Measure BIO-4 (Vegetation Resources Management Plan), Mitigation Measure VEG-8.17 (Revegetation of Temporarily Disturbed Areas), and Mitigation Measure VIS-4 (Decommissioning and Site Restoration Plan).	

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<p><b>LUPA-BIO-8:</b> 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:</p> <ul style="list-style-type: none"> <li>• Specifying and implementing the methods, timing (e.g., criteria for triggering closure and decommissioning actions), and criteria for success (including quantifiable and measureable criteria).</li> <li>• Recontouring of areas that were substantially altered from their original contour or gradient and installing erosion control measures in disturbed areas where potential for erosion exists.</li> <li>• Restoring vegetation as well as soil profiles and functions that will support and maintain native plant communities, associated carbon sequestration and nutrient cycling processes, and native wildlife species.</li> <li>• Vegetation restoration actions will identify and use native vegetation composition, native seed composition, and the diversity to values commensurate with the natural ecological setting and climate projections.</li> </ul>	X			X		
				The Applicant's Draft Decommissioning Plan is described in Section 2.3.6. Revegetation requirements are specified in Section 2.3.7.2 (Vegetation Management), 2.3.7.9 (Stormwater Management), Applicant-Proposed Measure BIO-4 (Vegetation Resources Management Plan), Mitigation Measure VEG-8.17 (Revegetation of Temporarily Disturbed Areas), and Mitigation Measure VIS-4 (Decommissioning and Site Restoration Plan).		

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CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-9:</b> Implement the following general LUPA CMA for water and wetland dependent resources:</p> <ul style="list-style-type: none"> <li>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:                             <ul style="list-style-type: none"> <li>On project sites, vehicles and other equipment will be maintained in proper working condition and only stored in designated containment areas where runoff is collected or controlled and that are located outside of streams, washes, and distributary networks to minimize accidental fluids and hazardous materials spills.</li> <li>Hazardous material leaks, spills, or releases will be immediately cleaned and equipment will be repaired upon identification. Removal and disposal of spill and related clean-up materials will occur at an approved off-site landfill.</li> <li>Maintenance and operations vehicles will carry the appropriate equipment and materials to isolate, clean up, and repair any hazardous material leaks, spills, or releases.</li> </ul> </li> <li>Activity-specific drainage, erosion, and sedimentation control actions, which meet the approval of BLM and the applicable regulatory agencies, will be carried out during all appropriate phases of the approved project. These actions, as needed, will address measures to ensure the proper protection of water quality, site-specific stormwater and sediment retention, and design of the project to minimize site disturbance, including the following:                             <ul style="list-style-type: none"> <li>Identify site-specific surface water runoff patterns and implement measures to prevent excessive and unnatural soil deposition and erosion.</li> <li>Implement measures to maintain natural drainages and to maintain hydrologic function in the event drainages are disturbed.</li> <li>Reduce the amount of area covered by impervious surfaces through use of permeable pavement or other pervious surfaces. Direct runoff from impervious surfaces into retention basins.</li> <li>Stabilize disturbed areas following grading in the manner appropriate to the soil type so that wind or water erosion is minimized.</li> <li>Minimize irrigation runoff by using low or no irrigation native vegetation landscaping for landscaped retention basins.</li> <li>Conduct regular inspections and maintenance of long-term erosion control measures to ensure long-term effectiveness.</li> <li>Project applicants for sites that may affect intermittent and perennial streams, springs, swales, ephemeral washes, wetland vegetation, other DRECP water land covers, or sites occupied by aquatic or riparian Focus and BLM Special Status Species due to groundwater or surface water extraction will conduct hydrologic studies during project planning to determine the potential effect of groundwater and surface water extraction on the hydrologic unit. These studies will include both watershed effects as well as effects on perched, alluvial, and regional aquifers. Projects that are likely to affect ground-water resources in a manner that would result in substantial loss of riparian or wetland communities or habitat for riparian or aquatic Focus and BLM Special Status Species are prohibited.</li> <li>The use of evaporation ponds for water management will be avoided when the water could harm birds or other terrestrial wildlife due to constituents of concern present in the wastewater (e.g., selenium, hypersalinity, etc.). Evaporation ponds will be configured to minimize attractiveness to shorebirds (e.g., maintain water depths over two feet; maintain steep slopes along edge; enclose evaporation ponds in long-term structures; or obscure evaporation ponds from view using materials that blend in with the natural surroundings).</li> <li>Ramps that allow the egress of wildlife from ponds or other water management infrastructure will be installed.</li> </ul> </li> </ul>	X			X		
				<ul style="list-style-type: none"> <li>Section 2.3.7.1 describes Hazardous Material and Waste Management procedures which are part of the Proposed Action, and Section 2.3.7.9 describes the Stormwater Management procedures.</li> <li>Section 4.20.2 describes the Applicant's proposed Construction Stormwater Pollution Prevention Plan (SWPPP).</li> <li>Applicant-Proposed Measure BIO-2 specifies the construction related plans to be followed. These include plans to prevent toxic chemicals, hazardous materials, and other fluids from entering vegetation-type streams (Waste Management Plan, Spill Prevention Control and Countermeasures Plan, and Hazardous Materials Plan), and plans to address drainage, erosion, and sedimentation control (SWPPP).</li> <li>Applicant-Proposed Measure BIO-3 describes construction BMPs which address these topics.</li> <li>Mitigation Measure WATER-1 provides further specification of the requirements for the Construction SWPPP. Mitigation Measures WATER-2 describes further requirements of the Comprehensive Drainage, Stormwater, and Sedimentation Control Plan.</li> </ul>		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-10:</b> 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:</p> <ul style="list-style-type: none"> <li>• Thoroughly clean the tires and undercarriage of vehicles entering or reentering the project site to remove potential weeds.</li> <li>• Store project vehicles on site in designated areas to minimize the need for multiple washings whenever vehicles re-enter the project site.</li> <li>• Properly maintain vehicle wash and inspection stations to minimize the introduction of invasive weeds or subsidy of invasive weeds.</li> <li>• Closely monitor the types of materials brought onto the site to avoid the introduction of invasive weeds and non-native species.</li> <li>• Reestablish native vegetation quickly on disturbed sites.</li> <li>• Monitor and quickly implement control measures to ensure early detection and eradication of weed invasions to avoid the spread of invasive weeds and non-native species on site and to adjacent off-site areas.</li> <li>• Use certified weed-free mulch, straw, hay bales, or equivalent fabricated materials for installing sediment barriers.</li> </ul>	X			X		
				Applicant-Proposed Measure APM-BIO-5 discusses the Applicant's Integrated Weed Management Plan, which has been reviewed and approved by the BLM Field Office.		
<p><b>LUPA-BIO-11:</b> Implement the following CMAs for controlling nuisance animals and invasive species:</p> <ul style="list-style-type: none"> <li>• No fumigant, treated bait, or other means of poisoning nuisance animals including rodenticides will be used in areas where Focus and BLM Special Status Species are known or suspected to occur.</li> <li>• Manage the use of widely spread herbicides and do not apply herbicides effective against dicotyledonous plants within 1,000 feet from the edge of a 100-year floodplain, stream and wash channels, and riparian vegetation or to soils less than 25 feet from the edge of drains. Exceptions will be made when targeting the base and roots of invasive riparian species such as tamarisk and <i>Arundo donax</i> (giant reed). Manage herbicides consistent with the most current national and California BLM policies.</li> <li>• Minimize herbicide, pesticide, and insecticide treatment in areas that have a high risk for groundwater contamination.</li> <li>• Clean and dispose of pesticide containers and equipment following professional standards. Avoid use of pesticides and cleaning containers and equipment in or near surface or subsurface water.</li> <li>• When near surface or subsurface water, restrict pesticide use to those products labeled safe for use in/near water and safe for aquatic species of animals and plants.</li> </ul>	X			X		
				Applicant-Proposed Measure APM-BIO-5 discusses the Applicant's Integrated Weed Management Plan, which has been reviewed and approved by the BLM Field Office.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-12:</b> For activities that may impact Focus or BLM Special Status Species, implement the following LUPA CMA for noise:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>Use noise controls on standard construction equipment including mufflers to reduce noise.</li> </ul>			X	X		
	The Project does not involve stationary noise sources. It does involve the use of construction equipment.			Section 4.12.2 specifies that construction equipment would employ factory-approved exhaust mufflers.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-13:</b> Implement the following CMA for project siting and design</p> <ul style="list-style-type: none"> <li>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).</li> <li>The siting of projects along the edges (i.e. general linkage border) of the biological linkages identified in Appendix D (Figures D-1 and D-2) will be configured (1) to maximize the retention of microphyll woodlands and their constituent vegetation type and inclusion of other physical and biological features conducive to Focus and BLM Special Status Species’ dispersal, and (2) informed by existing available information on modeled focus and BLM Special Status Species habitat and element occurrence data, mapped delineations of vegetation types, and based on available empirical data, including radio telemetry, wildlife tracking sign, and road-kill information. Additionally, projects will be sited and designed to maintain the function of F Special Status Species connectivity and their associated habitats in the following linkage and connectivity areas: <ul style="list-style-type: none"> <li>Within a 5-mile-wide linkage across Interstate 10 centered on Wiley’s Well Road to connect the Mule and McCoy mountains (the majority of this linkage is within the Chuckwalla ACEC and Mule-McCoy Linkage ACEC).</li> <li>Within a 3-mile-wide linkage across Interstate 10 to connect the Chuckwalla and Palen mountains.</li> <li>Within a 1.5-mile-wide linkage across Interstate 10 to connect the Chuckwalla Mountains to the Chuckwalla Valley east of Desert Center.</li> <li>The confluence of Milpitas Wash and Colorado River floodplain within 2 miles of California State Route 78 (this linkage is entirely within the Chuckwalla ACEC).</li> </ul> </li> <li>Delineate the boundaries of areas to be disturbed using temporary construction fencing and flagging prior to construction and confine disturbances, project vehicles, and equipment to the delineated project areas to protect vegetation types and focus and BLM Special Status Species.</li> <li>Long-term nighttime lighting on project features will be limited to the minimum necessary for project security, safety, and compliance with Federal Aviation Administration requirements and will avoid the use of constant-burn lighting.</li> <li>All long-term nighttime lighting will be directed away from riparian and wetland vegetation, occupied habitat, and suitable habitat areas for Focus and BLM Special Status Species. Long-term nighttime lighting will be directed and shielded downward to avoid interference with the navigation of night-migrating birds and to minimize the attraction of insects as well as insectivorous birds and bats to project infrastructure.</li> <li>To the maximum extent practicable (see Glossary of Terms), restrict construction activity to existing roads, routes, and utility corridors to minimize the number and length/size of new roads, routes, disturbance, laydown, and borrow areas.</li> <li>To the maximum extent practicable (see Glossary of Terms), confine vehicular traffic to designated open routes of travel to and from the project site, and prohibit, within project boundaries, cross-country vehicle and equipment use outside of approved designated work areas to prevent unnecessary ground and vegetation disturbance.</li> <li>To the maximum extent practicable(see Glossary of Terms) , construction of new roads and/or routes will be avoided within Focus and BLM Special Status Species suitable habitat within identified linkages for those Focus and BLM Special Status Species, unless the new road and/or route is beneficial to minimize net impacts to natural or ecological resources of concern. These areas will have a goal of “no net gain” of project roads and/or routes</li> <li>To the maximum extent practicable (see Glossary of Terms), any new road and/or route considered within Focus and BLM Special Status Species suitable habitat within identified linkages for those Focus and BLM Special Status Species will not be paved so as not to negatively affect the function of identified linkages.</li> <li>Use nontoxic road sealants and soil stabilizing agents.</li> </ul>			X			X
		<ul style="list-style-type: none"> <li>The Blue paloverde-Desert Ironwood Alliance (within the Madrean Warm Semi-Desert Wash Woodland/Scrub and Sonoran-Coloradan Semi-Desert Wash Woodland/Scrub specified in Table 17) is present outside in the area, but is avoided by the footprint of all alternatives.</li> <li>The Project is situated so that it may impact Special Status Species (Harwood’s eriastrum and Burrowing owl). No Plant Focus species, as defined in Table 23, are present in the Project area.</li> <li>The Project is not located within or on the edges of any of the linkages shown in Maps D-1 or D-2.</li> <li>The Project will require measures to protect vegetation types.</li> <li>The Project will include nighttime lighting.</li> <li>The Project will include roads.</li> </ul>	<ul style="list-style-type: none"> <li>No Alternatives would directly impact the Blue paloverde-Desert Ironwood Alliance. However, the Proposed Action would be situated within the 200 foot setback distance of an area of Blue paloverde-Desert Ironwood Alliance that is located outside of the Project footprint. Alternatives 2 and 3 would be located more than 200 feet away from the Blue paloverde-Desert Ironwood Alliance.</li> <li>Table 4.3-2 shows that all alternatives would directly impact Harwood’s eriastrum. Because Alternatives 2 and 3 would still achieve the basic objectives of the activity, the Proposed Action does not avoid these resources to the maximum extent practicable, and does not conform. Alternatives 2 and 3 do conform.</li> <li>All of the action alternatives would impact Burrowing owl habitat. However, because this is widespread across the site, it cannot be avoided by any reduced acreage configurations of the Project while still achieving the basic objectives of the activity.</li> <li>Section 2.3.7.5 specifies flagging or staking or protected areas. Mitigation Measure VEG-8 specifies flagging and temporary fencing of work areas.</li> <li>Nighttime lighting restrictions are discussed in Section 2.3.4.7 (Construction Schedule), Section 4.4.3.1 (impacts to wildlife habitat during construction), and the Applicant-Proposed Measures provided in Section 4.19.2.</li> <li>Section 2.3.3.2 describes the location of the proposed gen-tie line within an existing utility corridor, and Section 2.3.3.3 describes the access roads that would be used. The Proposed Action would conform to the requirement to place the gen-tie line within a designated corridor to the extent possible, by using the most direct (shortest) route between the Onsite Substation and the corridor. Alternatives 2 and 3, described in Sections 2.5 and 2.6, respectively, would not conform, because the gen-tie line would not use the shortest route between the Onsite Substation and the corridor. Mitigation Measure VEG-8.3 specifies that vehicles will be restricted to existing routes. Mitigation Measure VEG-8.6 specifies that soil stabilizers be non-toxic.</li> </ul>			

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-BIO-14:</b> Implement the following general standard practices to protect Focus and BLM Special Status Species: <ul style="list-style-type: none"> <li>• Feeding of wildlife, leaving of food or trash as an attractive nuisance to wildlife, collection of native plants, or harassing of wildlife on a site is prohibited.</li> <li>• Any wildlife encountered during the course of an activity, including construction, operation, and decommissioning will be allowed to leave the area unharmed.</li> <li>• Domestic pets are prohibited on sites. This prohibition does not apply to the use of domestic animals (e.g., dogs) that may be used to aid in official and approved monitoring procedures/protocols, or service animals (dogs) under Title II and Title III of the American with Disabilities Act.</li> <li>• All construction materials will be visually checked for the presence of wildlife prior to their movement or use. Any wildlife encountered during the course of these inspections will be allowed to leave the construction area unharmed.</li> <li>• All steep-walled trenches or excavations used during the project will be covered, except when being actively used, to prevent entrapment of wildlife. If trenches cannot be covered, they will be constructed with escape ramps, following up-to-date design standards to facilitate and allow wildlife to exit, or wildlife exclusion fencing will be installed around the trench(s) or excavation(s). Open trenches or other excavations will be inspected by a designated biologist immediately before backfilling, excavation, or other earthwork.</li> <li>• Minimize natural vegetation removal through implementation of crush and drive or cut or mow vegetation rather than removing entirely.</li> </ul>	Yes	No	Partial	Yes	No	Partial
	X			X		
					<ul style="list-style-type: none"> <li>• Applicant-Proposed Measure APM-BIO-3 discusses the Construction BMPs, which include measures for managing trash and debris. Additional information is provided in Mitigation Measures VEG-8.</li> <li>• Mitigation Measures which specify means to allow wildlife to be moved out of harm's way include VEG-6, VEG-8.10, and WIL-1.</li> <li>• Mitigation Measures which prohibit bringing pets onsite include VEG-8.14, and WIL-8.</li> <li>• Mitigation Measure VEG-8.9 requires checking under vehicles for wildlife. Mitigation Measure 8.10(b) requires checking under construction materials.</li> <li>• Mitigation Measure 8.10 specifies procedures for avoiding wildlife pitfalls.</li> <li>• Section 2.3.4.3 discusses site preparation, and specifies that the preferred method is disk, rolling, and compacting vegetation, in order to leave vegetation in place to control erosion. Mitigation Measure VEG-9 also specifies crushing of vegetation, as opposed to blading, in order to maintain the seed bank.</li> </ul>	
<b>LUPA-BIO-15:</b> Use state-of-the-art, as approved by BLM, construction and installation techniques, appropriate for the specific activity/project and site, that minimize new site disturbance, soil erosion and deposition, soil compaction, disturbance to topography, and removal of vegetation.	Yes	No	Partial	Yes	No	Partial
	X			X		
					The Project design presented in the POD, and the mitigation measures described in the EIS/EIR, have been developed based on the most recent available guidance and templates. Conformance is also to be achieved through BLM review and approval of the Final POD and mitigation measures.	

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-16:</b> For activities that may impact Focus and BLM sensitive birds, protected by the ESA and/or Migratory Bird Treaty Act of 1918, and bat species, implement appropriate measures as per the most up-to-date BLM state and national policy and guidance, and data on birds and bats, including but not limited to activity specific plans and actions. The goal of the activity -specific bird and bat actions is to avoid and minimize direct mortality of birds and bats from the construction, operation, maintenance, and decommissioning of the specific activities.</p> <p>Activity-specific measures to avoid and minimize impacts may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Siting and designing activities will avoid high bird and bat movement areas that separate birds and bats from their common nesting and roosting sites, feeding areas, or lakes and rivers.</li> <li>• For activities that impact bird and bat Focus and BLM Special Status Species, during project siting and design, conducting monitoring of bird and bat presence as well as bird and bat use of the project site using the most current survey methods and best procedures available at the time.</li> <li>• Reusing or co-locating new transmission facilities and other ancillary facilities with existing facilities and disturbed areas to reduce habitat destruction and avoid additional collision risks.</li> <li>• Reducing bird and bat collision hazards by utilizing techniques such as unguyed monopole towers or tubular towers. Where the use of guywires is unavoidable, demarcate guywires using the best available methods to minimize avian species strikes.</li> <li>• When fencing is necessary, use bird and bat compatible design standards.</li> <li>• Using lighting that does not attract birds and bats or their prey to project sites including using non-steady burning lights (red, dual red and white strobe, strobe- like flashing lights) to meet Federal Aviation Administration requirements, using motion or heat sensors and switches to reduce the time when lights are illuminated, using appropriate shielding to reduce horizontal or skyward illumination, and avoiding the use of high-intensity lights (e.g., sodium vapor, quartz, and halogen).</li> <li>• Implementing a robust monitoring program to regularly check for wildlife carcasses, document the cause of mortality, and promptly remove the carcasses.</li> <li>• Incorporating a bird and bat use and mortality monitoring program during operations using current protocols and best procedures available at time of monitoring.</li> </ul>	X			X		
					<ul style="list-style-type: none"> <li>• Protocols for presence and use surveys for birds are described in BRTR Section 2.8.3, and are summarized in EIS/EIR Section 3.4.1.1. Protocols for presence and use surveys for bats are described in BRTR Section 2.8.4.3, and are summarized in EIS/EIR Section 3.4.1.1. The surveys were conducted under the direction of BLM staff, and the resulting reports were approved by those staff. Therefore, the surveys used the most current survey methods available at the time.</li> <li>• Section 2.3.3.2 describes the location of the proposed gen-tie line within an existing utility corridor. The Proposed Action would conform to the requirement to co-locate the gen-tie line with other transmission lines to the extent possible, by using the most direct (shortest) route between the Onsite Substation and the corridor. Alternatives 2 and 3, described in Sections 2.5 and 2.6, respectively, would not conform, because the gen-tie line would not be co-located with existing lines for approximately half of its length.</li> <li>• Nighttime lighting restrictions are discussed in Section 2.3.4.7 (Construction Schedule), Section 4.4.3.1 (impacts to wildlife habitat during construction), and the Applicant-Proposed Measures provided in Section 4.19.2.</li> </ul>	

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>			
	Yes	No	Partial	Yes	No	Partial	
<p><b>LUPA-BIO-17:</b> 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:</p> <ul style="list-style-type: none"> <li>• Incorporating a bird and bat use and mortality monitoring program during operations using current protocols and best procedures available at time of monitoring.</li> <li>• Activity-specific operational avoidance and minimization actions that reduce the level of mortality on the populations of bird and bat species, such as: <ul style="list-style-type: none"> <li>• Use techniques that minimize attraction of birds to hazardous situations that are mistaken to be or simulate natural habitats (e.g., bodies of water).</li> <li>• Implement operational management techniques that minimize impacts to migratory birds during diurnal and seasonal cycles (e.g., positioning of heliostats to decrease surface area exposed to avian species).</li> <li>• Evaluation and installation of the best available bird and bat detection and deterrent technologies available at the time of construction.</li> </ul> </li> </ul> <p>Known important Focus and BLM Special Status bird areas are:</p> <ul style="list-style-type: none"> <li>• Dry lakes and playas of the north Mojave region, which include China Lake, Koehn Lake, Harper Lake, and Searles Lake (as shown in the Audubon Important Bird Areas in Appendix D)</li> <li>• Antelope Valley (as shown in the Audubon Important Bird Areas in Appendix D)</li> <li>• Lower Colorado River Valley (as shown in the Audubon Important Bird Areas in Appendix D)</li> <li>• The Salton Sea and bordering areas including agricultural land of the Imperial Valley (as shown in the Audubon Important Bird Areas in Appendix D)</li> <li>• Documented avian movement corridors along the north slope of the San Gabriel and San Bernardino mountain ranges</li> <li>• Other regionally important seasonal use areas and migratory corridors identified in future studies or otherwise documented in the scientific literature over the term of the LUPA</li> </ul>	X			X			
	The Project is not located in an Audubon Important Bird Area, as shown in DRECP Figure D-3. However, the requirement still applies because it is an activity that may result in mortality to Focus and BLM Special-Status bird and bat species.				The BBCS will be finalized and approved by BLM and the USFWS prior to Project construction.		
<p><b>LUPA-BIO-RIPWET-1:</b> 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. (see Table 17 in DRECP).</p> <p>For minor incursion (see “minor incursion” in the Glossary of Terms) to the DRECP riparian vegetation types, wetland vegetation types, or encroachments on the setbacks listed in Table 17, the hydrologic function of the avoided riparian or wetland communities will be maintained.</p> <ul style="list-style-type: none"> <li>• Minor incursions in the riparian and wetland vegetation types or other features including the setbacks listed in Table 17 will occur outside of the avian nesting season, February 1 through August 31 or otherwise determined by BLM, USFWS and CDFW if the minor incursion(s) is likely to result in impacts to nesting birds.</li> </ul>	Yes	No	Partial	Yes	No	Partial	
		X					
	No Alternatives would directly impact the Blue paloverde-Desert Ironwood Alliance.						
<p><b>LUPA-BIO-RIPWET-2:</b> 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”).</p>	Yes	No	Partial	Yes	No	Partial	
		X					
	None of the referenced vegetation types are present at the project site.						

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-RIPWET-3:</b> 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.</p> <p>Based on the results of the nesting bird survey above, setback activities that are likely to impact BLM Special Status riparian and wetland bird species, including but not limited to pre-construction, construction and decommissioning, 0.25 mile from active nests Special Status during the breeding season (February 1 through August 31 or otherwise determined by BLM, USFWS and CDFW). For activities in areas covered by this provision that occur during the breeding season and that last longer than one week, nesting bird surveys may need to be repeated, as determined by BLM, in coordination with USFWS and CDFW, as appropriate. No pre-activity nesting bird surveys are necessary for activities occurring outside of the breeding season.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure WIL-7 proposes pre-construction surveys with dates of February 1 through August 31. It states that a setback of an appropriate size will be established.		
<p><b>LUPA-BIO-RIPWET-4:</b> 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).</p> <ul style="list-style-type: none"> <li>Demonstrate neutral or beneficial long-term hydrologic effects on federally listed fish species and the adjoining riparian and wetland habitat prior to seeking authorization for and commencing a minor incursion.</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	There are no fish species present at the project site.					
<p><b>LUPA-BIO-RIPWET-5:</b> Site and design activities to fully avoid operational impacts to existing and newly discovered occurrences of federally listed fish species.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	There are no fish species present at the project site.					
<p><b>LUPA-BIO-RIPWET-6:</b> 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).</p>	Yes	No	Partial	Yes	No	Partial
		X				
	The project is not located near habitat of the Tehachapi slender salamander.					
<p><b>LUPA-BIO-RIPWET-7:</b> Construct culverts or other suitable below-grade crossings for new or improved roadways that bisect suitable habitat for the Tehachapi Slender Salamander.</p> <ul style="list-style-type: none"> <li>Construct barriers to reduce at-grade crossings along new or improved roadways that bisect suitable habitat.</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	The project is not located near habitat of the Tehachapi slender salamander.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-DUNE-1:</b> 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:</p> <ul style="list-style-type: none"> <li>• Whether the proposed activity(s) occur within a sand dune or an Aeolian sand transport corridor</li> <li>• If the activity(s) is subject to dune/Aeolian sand transport corridor CMAs</li> <li>• If the activity(s) needs to be reconfigured to satisfy applicable avoidance requirements</li> </ul>	X			X		
	<p>Note – the reference to DRECP Figure D-7 in the CMA appears to be a typographical error. The CMA is actually referring the reader to use DRECP Figure D-15. The Project site is within the Dune/Sand area shown on DRECP Figure D-15.</p>			<p>Figure 3.3-2 shows the location of the project with respect to the Dune/Sand area shown in DRECP Figure D-15. The Applicant has mapped the location and extent of the resource, and has determined that the Project does occur within the corridor. There are no specific avoidance requirements for the sand transport corridor, but DFA-VPL-BIO-DUNE-1 requires that projects avoid dune vegetation (i.e., North American Warm Desert Dune and Sand Flats). North American Warm Desert Dune and Sand Flats in the Project area is mapped on DRECP Figure D-7. The resolution of that map is not detailed enough to ensure that the Project entirely avoids the North American Warm Desert Dune and Sand Flats area, but it appears that it does avoid it.</p> <p>Conformance with the other specific CMAs and avoidance requirements is addressed where applicable in other CMAs.</p>		
<p><b>LUPA-BIO-DUNE-2:</b> Activities that potentially affect the amount of sand entering or transported within Aeolian sand transport corridors will be designed and operated to:</p> <ul style="list-style-type: none"> <li>• Maintain the quality and function of Aeolian transport corridors and sand deposition zones, unless related to maintenance of existing [at the time of the DRECP LUPA ROD] facilities/operations/activities</li> <li>• Avoid a reduction in sand-bearing sediments within the Aeolian system</li> <li>• Minimize mortality to DUNE associated Focus and BLM Special Status Species</li> </ul>	X					X
	<p>DRECP only maps one sand-related feature, which is the “Dunes/Sand” area mapped on DRECP Figure D-15. In contrast, the BRTR and EIS/EIR map two separate features. Figure 3.3-2 shows the location of the project with respect to the “Sand Corridor”, which corresponds to the Dune/Sand area shown in DRECP Figure D-15, and covers virtually the entire project area.</p>			<p>As discussed in Section 3.3.1.1, the Dunes/Sand area mapped on DRECP Figure D-15 is not actually a continuous, inter-connected series of sand transport areas, nor is it currently functioning to transport sand on a regional basis. Also, the Project is situated at the downwind end of the system, and evaluation of existing literature and local wind patterns indicates that any effects the Project has in an upwind direction would be very localized. Therefore, the Project would not affect the quality or function of the corridor, and would not reduce sand-bearing sediments within the system.</p> <p>With respect to minimizing mortality to dune-associated species, the Harwood’s eriastrum and the Mojave fringe-toed lizard, are specifically associated with dunes. All alternatives would include direct impacts to these species. However, most of these impacts under Alternatives 2 and 3 are associated with the gen-tie line, which is required under the CDCA Plan to be placed within the utility corridor. The utility corridor is coincident with the lizard and eriastrum habitat, so these impacts are unavoidable.</p>		
<p><b>LUPA-BIO-DUNE-3:</b> 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</p>	X			X		

Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
transport function must be approved by BLM in coordination with USFWS and CDFW as appropriate.				<p>All alternatives avoid direct impacts to sand dunes to the extent possible. Under the Proposed Action, the gen-tie line would be situated within an area of dunes because the utility corridor is coincident with the dunes. Under Alternatives 2 and 3, the gen-tie line would largely avoid the area of dunes within the utility corridor.</p> <p>The facility itself is a porous barrier. Localized sand deposition will occur at fencelines and at support posts, but long-term sand transport rates through the facility would not be changed. In addition, there are no deposition zones downwind of the facility to be impacted.</p>		
<p><b>LUPA-BIO-DUNE-4:</b> 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.</p> <p>For minor incursions (see “minor incursion” in the Glossary of Terms) into sand dunes and sand transport areas the activity will be sited in the mapped zone with the least impacts to sand dunes and sand transport and Mojave fringe-toed lizards.</p>	Yes	No	Partial	Yes	No	Partial
	X					X
				<p>The “Sand Corridor” (which corresponds to the Dune/Sand area shown in DRECP Figure D-15) was mapped in association with DRECP, and onsite vegetation was mapped by BLM biologists assigned to the Project. The map showing both features is Figure 3.3-2.</p> <p>Table 4.3-1 shows the relative disturbance of this habitat by Alternatives 1, 2, and 3, and Table 4.4-3 shows that the disturbance associated with impacts to Mojave fringe-toed lizards. With respect to both the habitat and the occurrences of Mojave fringe-toed lizards, Alternatives 2 and 3 avoid impacts to the extent feasible, while the Proposed Action does not avoid to the extent feasible, and therefore does not conform.</p>		
<p><b>LUPA-BIO-DUNE-5:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 2.3.4.1 specifies that clearance surveys for Mojave fringe-toed lizard will be performed.		
<p><b>LUPA-BIO-BAT-1:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	As discussed in Section 2.8.4.3 of the Biological Resources Technical Report (BRTR), the closest bat colony is 3.4 miles away from the Project site.					
<p><b>LUPA-BIO-BAT-2:</b> 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).</p>	Yes	No	Partial	Yes	No	Partial
		X				
	As discussed in Section 2.8.4.3 of the BRTR, the closest bat colony is 3.4 miles away from the Project site.					
<p><b>LUPA-BIO-PLANT-1:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		

Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
				The vegetation surveys are described in Section 2.7 of the BRTR, and in Sections 3.3.1.1 and 3.3.1.2 of the EIS/EIR. The surveys were performed under the direction of BLM biologists assigned to the Project, who approved the BRTR. Therefore, the mapping was done according to the most current BLM survey protocols at the time of the surveys.		
<p><b>LUPA-BIO-PLANT-2:</b> 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).</p>	Yes	No	Partial	Yes	No	Partial
	X					X
				Table 4.3-3 shows that the solar plant site for the Proposed Action would directly impact the Harwood's eriastrum, while the solar plant site for Alternatives 2 and 3 would avoid all occurrences of Harwood's eriastrum. However, the solar site for Alternative 2 does not meet the setback distance of 0.25 miles for BLM Sensitive plant species. The solar array footprint for Alternative 3 does meet the setback distance. The gen-tie corridor for all action alternatives also directly impacts the Harwood's eriastrum, but this impact is unavoidable because the gen-tie line is required to be placed within the approved utility corridor.		
<p><b>LUPA-BIO-PLANT-3:</b> 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.</p> <p>For those plants with Species Specific DFA Suitable Habitat Impact Caps listed in Table 23, those caps apply in the DFAs only. Refer to CMA <b>DFA-PLANT-1</b>.</p>	Yes	No	Partial	Yes	No	Partial
			X			X
	One BLM Special Status plant species, the Harwood's eriastrum, is present in the Project area. No Plant Focus species, as defined in Table 23, are present in the Project area.			Table 4.3-3 shows that the solar plant site for the Proposed Action would directly impact the Harwood's eriastrum, while the solar plant site for Alternatives 2 and 3 would avoid all occurrences of Harwood's eriastrum. Because Alternatives 2 and 3 meet the purpose and need, the Proposed Action does not avoid this species to the extent feasible. Therefore, the Proposed Action does not conform, but Alternatives 2 and 3 do conform.		
<p><b>LUPA-BIO-SVF-1:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
			X	X		
	<p>The following resources are not present at the project site, and are not applicable: Yucca clones, creosote rings, Saguaro cactus, and Joshua tree woodland.</p> <p>The following resource is present near the Project site: Microphyll woodland (desert dry wash woodland)<sup>4</sup>.</p> <p>The following resource was not identified in site surveys, but was determined to have a moderate potential to occur, and may be applicable: Crucifixion thorn stands.</p>			All alternatives would avoid the mapped area of microphyll woodland. No map of Crucifixion thorn is provided, since no individuals were identified in site surveys. The BRTR recommends that focused surveys specific to the Emory's crucifixion thorn be conducted.		
<p><b>LUPA-BIO-SVF-2:</b> Yucca clones larger than 3 meters in diameter (longest diameter if the clone forms an ellipse rather than a circular ring) shall be avoided.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	Yucca clones are not present in the Project area.					
<p><b>LUPA-BIO-SVF-3:</b> Creosote bush rings (see Glossary of Terms) larger than 5 meters in diameter (longest</p>	Yes	No	Partial	Yes	No	Partial

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
diameter if the “ring” forms an ellipse rather than a circle) shall be avoided.		X				
	Creosote rings are not present in the Project area.					
<b>LUPA-BIO-SVF-4:</b> Saguaro cactus should be managed in such a way as to provide long-term habitat for the California populations not just individual plants, except in DFAs.	Yes	No	Partial	Yes	No	Partial
		X				
	Saguaro cactus are not present in the Project area.					
<b>LUPA-BIO-SVF-5:</b> 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).	Yes	No	Partial	Yes	No	Partial
		X				
	Joshua tree woodland is not present in the Project area.					
<b>LUPA-BIO-SVF-6:</b> Microphyll woodland: impacts to microphyll woodland (see Glossary of Terms) will be avoided, except for minor incursions (see Glossary of Terms).	Yes	No	Partial	Yes	No	Partial
	X			X		
				All alternatives would avoid the microphyll woodland.		
<b>LUPA-BIO-SVF-7:</b> Crucifixion thorn stands: (Castela emoryi Shrubland Special Stands) Crucifixion thorn stands with greater than 100 individuals will be avoided.	Yes	No	Partial	Yes	No	Partial
		X				
	No crucifixion thorn stands were identified in plant surveys.					
<b>LUPA-BIO-VEG-1:</b> Management of cactus, yucca, and other succulents will adhere to current up-to-date BLM policy.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Applicant-Proposed Measure APM-BIO-4 specifies procedures for managing cacti.		
<b>LUPA-BIO-VEG-2:</b> Promote appropriate levels of dead and downed wood on the ground, outside of campground areas, to provide wildlife habitat, seed beds for vegetation establishment, and reduce soil erosion, as determined appropriate on an activity-specific basis.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 2.3.4.3 discusses site preparation, and specifies that the preferred method is disk, rolling, and compacting vegetation, in order to leave vegetation in place to control erosion. Mitigation Measures VEG-9 also specifies crushing of vegetation, as opposed to blading, in order to maintain the seed bank.		
<b>LUPA-BIO-VEG-3:</b> Allow for the collection of plant material consistent with the maintenance of natural ecosystem processes.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project does not include the collection of plant material.					
<b>LUPA-BIO-VEG-4:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project is not within the Bishop Field Office area.					
<b>LUPA-BIO-VEG-5:</b> All activities will follow applicable BLM state and national regulations and policies for	Yes	No	Partial	Yes	No	Partial

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
salvage and transplant of cactus, yucca, other succulents, and BLM Sensitive plants.	X			X		
				Applicant-Proposed Measure APM-BIO-4 specifies procedures for managing cacti.		
<b>LUPA-BIO-VEG-6:</b> BLM may consider disposal of succulents through public sale, as per current up-to-date state and national policy.	Yes	No	Partial	Yes	No	Partial
		X				
	Although BLM may consider sale of succulents associated with the Project, this is an internal BLM actions, not a condition for approval for a ROW authorization.					
<b>LUPA-BIO-IFS-1:</b> Activities within desert tortoise linkages, identified in Appendix D, that may have a negative impact on the linkage will require an evaluation, in the environmental document(s), of the effects on the maintenance of long- term viable desert tortoise populations within the affected linkage. The analysis will consider the amount of suitable habitat, including climate refugia, required to ensure long-term viability within each linkage given the linkage’s population density, long-term demographic and genetic needs, degree of existing habitat disturbance/impacts, mortality sources, and most up-to-date population viability modeling.  Activities that would compromise the long-term viability of a linkage population or the function of the linkage, as determined by the BLM in coordination with USFWS and CDFW, are prohibited and will require reconfiguration or re-siting.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project is not within a desert tortoise linkage, as identified in DRECP Figure D-16.					
<b>LUPA-BIO-IFS-2:</b> 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.  Any new road considered within a TCA or identified linkage will not be paved and will be designed and sited to minimize the effect to the function of identified linkages or local desert tortoise populations and shall have a maximum speed limit of 25 miles per hour.  Roads requiring the installation of long-term desert tortoise exclusion fencing for construction or operation will incorporate wildlife underpasses (e.g., culverts) to reduce population fragmentation.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project is not within a desert tortoise conservation area (TCA) or linkage, as identified in DRECP Figure D-16.					
<b>LUPA-BIO-IFS-3:</b> All culverts for access roads or other barriers will be designed to allow unrestricted access by desert tortoises and will be large enough that desert tortoises are unlikely to use them as shelter sites (e.g., 36 inches in diameter or larger). Desert tortoise exclusion fencing may be utilized to direct tortoise use of culverts and other passages.	Yes	No	Partial	Yes	No	Partial
		X				
	Neither the POD nor the EIS/EIR identify that culverts will be installed.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-IFS-4:</b> 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.</p> <ul style="list-style-type: none"> <li>Exemption from desert tortoise protocol survey requirements can be obtained from BLM, in coordination with USFWS, and CDFW as applicable, on a case-by-case basis if a designated biologist determines the activity site does not contain the elements of desert tortoise habitat, is unviable for occupancy, or if baseline studies inferred absence during the current or previous active season.</li> <li>Construction of desert tortoise exclusion fences will occur during the time of year when tortoise are less active in order to minimize impacts and to accommodate subsequent desert tortoise surveys. Any exemption or modification of desert tortoise exclusion fencing requirements will be based on the specifics of the activity and the site-specific population and habitat parameters. Sites with low population density and disturbed, fragmented, or poor habitat are likely to be candidates for fencing requirement exemptions or modifications. Substitute measures, such as on-site biological monitors in the place of the fencing requirement, may be required, as appropriate.</li> <li>After an area is fenced, and until desert tortoises are removed, the designated biologist is responsible for ensuring that desert tortoises are not being exposed to extreme temperatures or predators as a result of their pacing the fence. Remedies may include the use of shelter sites placed along the fence, immediate translocation, removal to a secure holding area, or other means determined by the BLM, USFWS, and CDFW, as applicable.</li> <li>Modification or elimination of the above requirement may also be approved if the activity design will allow retention of desert tortoise habitat within the footprint. If such a modification is approved, modified protective measures may be required to minimize impacts to desert tortoises that may reside within the activity area.</li> <li>Immediately prior to desert tortoise exclusion fence construction, a designated biologist (see Glossary of Terms) will conduct a clearance survey of the fence alignment to clear desert tortoises from the proposed fence line's path.</li> <li>All desert tortoise exclusion fencing will incorporate desert tortoise proof gates or other approved barriers to prevent access of desert tortoises to work sites through access road entry points.</li> <li>Following installation, long-term desert tortoise exclusion fencing will be inspected for damage quarterly and within 48 hours of a surface flow of water due to a rain event that may damage the fencing.</li> <li>All damage to long-term or short-term desert tortoise exclusion fencing will be immediately blocked to prevent desert tortoise access and repaired within 72 hours.</li> </ul>	X			X		
					Mitigation Measure WIL-1 specifies requirements for desert tortoise fencing. That measure has been compiled from previous EISs (McCoy, Modified Blythe), and is based on the USFWS 2009 requirements.	

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-IFS-5:</b> 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.</p> <p>A designated biologist will inspect construction pipes, culverts, or similar structures: (a) with a diameter greater than 3 inches, (b) stored for one or more nights, (c) less than 8 inches aboveground and (d) within desert tortoise habitat (such as, outside the long-term fenced area), before the materials are moved, buried, or capped.</p> <p>As an alternative, such materials shall be capped before storing outside the fenced area or placing on pipe racks. Pipes stored within the long-term fenced area after completing desert tortoise clearance surveys will not require inspection.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measures VEG-1 through VEG-5 specify the qualifications, duties, and authorities of the Designated Biologist(s) and Monitor(s). Specific requirements for inspecting pipes and culverts are provided in Mitigation Measure VEG-8.10.		
<p><b>LUPA-BIO-IFS-6:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measures VEG-1 through VEG-5 specify the qualifications, duties, and authorities of the Designated Biologist(s) and Monitor(s). Mitigation Measure VEG-8.16 specifies monitoring during geotechnical evaluations.		
<p><b>LUPA-BIO-IFS-7:</b> A designated biologist (see Glossary of Terms) will accompany any geotechnical testing equipment to ensure no tortoises are killed and no burrows are crushed.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measures VEG-1 through VEG-5 specify the qualifications, duties, and authorities of the Designated Biologist(s) and Monitor(s). Mitigation Measure VEG-8.16 specifies monitoring during geotechnical evaluations.		
<p><b>LUPA-BIO-IFS-8:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure VEG-8.9 specifies the requirements for inspecting under vehicles.		
<p><b>LUPA-BIO-IFS-9:</b> Vehicular traffic will not exceed 15 miles per hour within the areas not cleared by protocol level surveys where desert tortoise may be impacted.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Applicant-Proposed Measure specifies a speed limit of 15 mph in all unimproved areas.		
<p><b>LUPA-BIO-IFS-10:</b> Comply with the conservation goals and objectives, criteria, and management planning actions identified in the most recent revision of the Flat-tailed Horned Lizard Rangeland Management Strategy (RMS). Activities will include appropriate design features using the most current information from the RMS and RMS Interagency Coordinating Committee to minimize adverse impacts during siting, design, pre-construction, construction, operation, and decommissioning; ensure that current or potential linkages and habitat quality are maintained; reduce mortality; minimize other adverse impacts during operation; and ensure that activities have a neutral or positive effect on the species.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not within the range of the Flat-tailed horned lizard.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-BIO-IFS-11:</b> If Bendire's thrasher is present, conduct appropriate activity-specific biological monitoring (see Glossary of Terms) to ensure that Bendire's thrasher individuals are not directly affected by operations (i.e., mortality or injury, direct impacts on nest, eggs, or fledglings).	Yes	No	Partial	Yes	No	Partial
	X			X		
				Table 3.4-1 lists the species as Low Potential, with nesting habitat present. Mitigation Measure WIL-7 specifies requirements for pre-construction nest surveys. This measure specifies that, if active or suspected active nests are identified, a monitoring plan shall be developed, and a qualified biologist shall perform monitoring.		
<b>LUPA-BIO-IFS-12:</b> If burrowing owls are present, a designated biologist (see Glossary of Terms) will conduct appropriate activity-specific biological monitoring (see Glossary of Terms) to ensure avoidance of occupied burrows and establishment of the 656 feet (200 meter) setback to sufficiently minimize disturbance during the nesting period on all activity sites, when practical.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure WIL-9 specifies requirements for burrowing owl surveys, avoidance, and monitoring, including the setback of 656 feet.		
<b>LUPA-BIO-IFS-13:</b> If burrows cannot be avoided on-site, passive burrow exclusion by a designated biologist (see Glossary of Terms) through the use of one-way doors will occur according to the specifications in Appendix D or the most up-to-date agency BLM or CDFW specifications. Before exclusion, there must be verification that burrows are empty as specified in Appendix D or the most up-to-date BLM or CDFW protocols. Confirmation that the burrow is not currently supporting nesting or fledgling activities is required prior to any burrow exclusions or excavations.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure WIL-9 specifies requirements for burrowing owl surveys, avoidance, and monitoring, including passive burrow exclusion.		
<b>LUPA-BIO-IFS-14:</b> Activity-specific active translocation of burrowing owls may be considered, in coordination with CDFW.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure WIL-9 specifies that active translocation may be done, in coordination with CDFW.		
<b>LUPA-BIO-IFS-15:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The project site is not within the range of the condor.					
<b>LUPA-BIO-IFS-16:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The project site is not within the range of the condor.					
<b>LUPA-BIO-IFS-17:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The project site is not within the range of the condor.					
<b>LUPA-BIO-IFS-18:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The project site is not within the range of the condor.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-BIO-IFS-19:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The project site is not within the range of the condor.					
<b>LUPA-BIO-IFS-20:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The project site is not within the range of the condor.					
<b>LUPA-BIO-IFS-21:</b> 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: <ul style="list-style-type: none"> <li>• Barriers, including welded wire fabric or hardware cloth, will be installed to prevent access around any facility element that poses a danger to condors.</li> <li>• Stainless steel lines, rather than poly chemical lines will be used to preclude condors from obtaining and ingesting pieces of poly chemical lines.</li> <li>• Landing deterrents attached to the walking perching substrates, such as porcupine wire or Daddi Long Legs<sup>®</sup>.</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	The project site is not within the range of the condor.					
<b>LUPA-BIO-IFS-22:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The project site is not within the range of the condor.					
<b>LUPA-BIO-IFS-23:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The project site is not within the range of the condor.					
<b>LUPA-BIO-IFS-24:</b> Provide protection from loss and harassment of active golden eagle nests through the following actions: <p>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.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	Although DRECP identifies one nesting site in the McCoy Mountains within the 10-mile radius, no active golden eagle nests were detected within the 10 mile radius surrounding the Study Area during surveys. Although the site is considered foraging habitat, it would not be sited within 1 mile of any active or alternative golden eagle nest.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-BIO-IFS-25:</b> 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 <b>CONS-BIO-IFS-5</b> for the requirement in Conservation Lands.	Yes	No	Partial	Yes	No	Partial
		X				
	Although DRECP identifies one nesting site in the McCoy Mountains within the 10-mile radius, no active golden eagle nests were detected within the 10 mile radius surrounding the Study Area during surveys. Although the site is considered foraging habitat, it would not contribute to loss of foraging habitat within 1 to 4 mile radius around any nest.					
<b>LUPA-BIO-IFS-26:</b> For activities that impact golden eagles, applicants will conduct a risk assessment per the applicable USFWS guidance (e.g. the Eagle Conservation Plan Guidance) using best available information as well as the data collected in the pre-project golden eagle surveys.	Yes	No	Partial	Yes	No	Partial
	X			X		
	The project will impact foraging habitat for golden eagles.			BLM, USFWS, and Applicant will address risks to golden eagles through the BBCS.		
<b>LUPA-BIO-IFS-27:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	Outside of land use plans, the BLM does not require applicants to apply for an eagle take permit.					
<b>LUPA-BIO-IFS-28:</b> 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:  <ul style="list-style-type: none"> <li>• Wind projects and solar projects involving a power tower</li> <li>• Other activities for which the BLM, in coordination with USFWS, and CDFW as appropriate, determines take of golden eagle is reasonably foreseeable or there is a potential for take of golden eagle</li> </ul>	Yes	No	Partial	Yes	No	Partial
	X			X		
				As reported in Section 2.8.3.4 of the Biological Resources Technical Report and EIS/EIR Section 3.4.1.1, two years of golden eagle surveys were done.		
<b>LUPA-BIO-IFS-29:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (management of recreation) which is not related to authorization of the Project.					
<b>LUPA-BIO-IFS-30:</b> For activities where ongoing take of golden eagles is anticipated, develop advanced conservation practices per USFWS Eagle Conservation Plan Guidance.	Yes	No	Partial	Yes	No	Partial
	X			X		
	The project will impact foraging habitat for golden eagles.			BLM, USFWS, and Applicant will address risks to golden eagles through the BBCS.		
<b>LUPA-BIO-IFS-31:</b> 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.	Yes	No	Partial	Yes	No	Partial
	X			X		
	The project will impact foraging habitat for golden eagles.			BLM, USFWS, and Applicant will address risks to golden eagles through the BBCS.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-BIO-IFS-32:</b> Avoid use of rodenticides and insecticides within five miles of active Swainson’s hawk nest.	Yes	No	Partial	Yes	No	Partial
		X				
	Applicant does not propose to use insecticides or rodenticides.					
<b>LUPA-BIO-IFS-33:</b> Access to, and use of, designated water sources for desert bighorn sheep will not be impeded by activities in designated and new utility corridors.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.4.3.1 discusses Project impacts to bighorn sheep. That section states that the project would not present a barrier to movement of bighorn sheep.		
<b>LUPA-BIO-IFS-34:</b> Transmission projects and new utility corridors will minimize effects on access to, and use of, designated water sources for desert bighorn sheep.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.4.3.1 discusses Project impacts to bighorn sheep. That section states that the project would not present a barrier to movement of bighorn sheep.		
<b>LUPA-BIO-IFS-35:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.					
<b>LUPA-BIO-IFS-36:</b> 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.  • Activities within a key population center, as identified in Appendix D, must be designed to avoid adversely impacting the long-term function of the affected key population center.	Yes	No	Partial	Yes	No	Partial
		X				
	Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.					
<b>LUPA-BIO-IFS-37:</b> 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).	Yes	No	Partial	Yes	No	Partial
		X				
	Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.					
<b>LUPA-BIO-IFS-38:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-IFS-39:</b> 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.</p> <ul style="list-style-type: none"> <li>Detected occurrences of Mohave ground squirrel will be flagged and avoided, with a minimum avoidance area of 50 feet, until the squirrels have moved out of harm's way. A designated biologist (see Glossary of Terms) may also actively move squirrels out of harm's way.</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.					
<p><b>LUPA-BIO-IFS-40:</b> 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.</p> <p>Activities that occur in Mohave ground squirrel linkages shown in Appendix D must be configured and located in a manner that does not diminish Mohave ground squirrel populations in the linkage.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.					
<p><b>LUPA-BIO-IFS-41:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.					
<p><b>LUPA-BIO-IFS-42:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.					
<p><b>LUPA-BIO-COMP-1:</b> 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 <b>LUPA-BIO-COMP-2</b> through <b>-4</b>, and previously listed CMAs. Compensation acreage requirements may be fulfilled through non-acquisition (i.e., restoration and enhancement), land acquisition (i.e., preserve), or a combination of these options, depending on the activity specifics and BLM approval/authorization.</p> <p>Compensation for the impacts to designated desert tortoise critical habitat will be in the same critical habitat unit as the impact (see Table 18). Compensation for impacts to desert tortoise will be in the same recovery unit as the impact.</p> <p>Refer to CMA <b>LUPA-COMP-1</b> and <b>2</b> for the timing requirements for initiation or completion of compensation.</p>	Yes	No	Partial	Yes	No	Partial
			X	X		
	<p>There are no state or Federally protected plant species present in the Project area, so compensatory mitigation for plant species likely does not apply.</p> <p>Applicable for impacts to state waters.</p> <p>Applicable to desert tortoise, except that the requirement associated with designated critical habitat does not apply.</p> <p>Applicable to burrowing owl.</p> <p>Applicable to Mojave fringe-toed lizard.</p>			<p>Mitigation Measure VEG-9D specifies compensatory mitigation requirements for state and Federally protected plant species, if necessary.</p> <p>Mitigation Measure VEG-10 specifies compensatory mitigation for riparian areas and state waters.</p> <p>Mitigation Measure WIL-4 specifies compensatory mitigation requirements for desert tortoise.</p> <p>Mitigation Measure WIL-9.3 specifies compensatory mitigation requirements for burrowing owl.</p> <p>Mitigation Measure WIL-10 specifies compensatory mitigation requirements for Mojave fringe-toed lizard.</p>		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-BIO-COMP-2:</b> 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.</p> <p>Each activity, as determined appropriate by BLM in coordination with USFWS, and CDFW as applicable, will include a monitoring strategy to provide activity-specific information on mortality effects on birds and bats in order to determine the amount and type of compensation required to offset the effects of the activity, as described above and in detail in Appendix D. Compensation will be satisfied by restoring, protecting, or otherwise improving habitat such that the carrying capacity or productivity is increased to offset the impacts resulting from the activity. Compensation may also be satisfied by non-restoration actions that reduce mortality risks to birds and bats (e.g., increased predator control and protection of roosting sites from human disturbance). Compensation will be consistent with the most up to date DOI mitigation policy.</p>	X				X	
				BLM, USFWS, and Applicant will address the need for compensation through the BBCS.		
<p><b>LUPA-BIO-COMP-3:</b> 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.</p>	X			X		
	The project will impact foraging habitat for golden eagles.			BLM, USFWS, and Applicant will address compensation for impacts to golden eagles through the BBCS.		
<p><b>LUPA-BIO-COMP-4:</b> 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.</p>	X			X		
	The project will impact foraging habitat for golden eagles.			BLM, USFWS, and Applicant will address compensation for impacts to golden eagles through the BBCS.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-AIR-1:</b> All activities must meet the following requirements: <ul style="list-style-type: none"> <li>• Applicable National Ambient Air Quality Standards (Section 109)</li> <li>• State Implementation Plans (Section 110)</li> <li>• Control of Pollution from Federal Facilities (Section 118) including non-point source</li> <li>• Prevention of Significant Deterioration, including visibility impacts to mandatory Federal Class I Areas (Section 160 et seq.)</li> <li>• Conformity Analyses and Determinations (Section 176[c])</li> <li>• Apply best management practices on a case by case basis</li> <li>• Applicable local Air Quality Management Jurisdictions (e.g., 403 SCAQMD)</li> </ul>			X	X		
	Section 4.2.1 states that the study area has no nonattainment or maintenance designations for any Federal AAQS. Consequently, there is no applicable State Implementation Plan, and formal CAA conformity requirements do not apply to Federal agency actions related to the Proposed Action or Alternatives. However, for the purposes of this analysis, the CAA conformity de minimis levels were used to gauge the potential for the Project and alternatives to result in an exceedance of Federal AAQS.			Conformance with the specified requirements is addressed throughout Section 4.2.3.1. Compliance with NAAQSs ( <i>de minimis</i> levels) is shown in Tables 4.2-3 and 4.2-4. Compliance with local MDAQMD CEQA thresholds is shown in Tables 4.2-2, 4.2-3, and 4.2-4.		
	The Project is not expected to have any stationary sources of emissions during the operational phase and will not store or handle substantive quantities hazardous materials during its construction and operation. Therefore, the Project will not be subject to the Federal stationary source regulations and requirements, such as Prevention of Significant Deterioration (PSD), New Source Review (NSR), New Source Performance Standards (NSPS), Maximum Achievable Control Technology (MACT), Federally Mandated Operating Permits, and Risk Management Plan (RMP).			Best management practices to be followed by the Project are described in Section 2.3.7.6, Section 4.2.2, and Mitigation Measure AQ-1.		
<b>LUPA-AIR-2:</b> Because project authorizations are a federal undertaking, air quality standards for fugitive dust may not exceed local standards and requirements.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Tables 4.2-2 and 4.2-3 show that local standards for fugitive dust (PM10 and PM2.5) would be exceeded during Project construction. Although mitigation of fugitive dust emissions is required in Mitigation Measure AQ-1, such mitigation would not keep emissions below the MDAQMD thresholds. The emissions would be temporary, occurring only during construction. The local agencies will determine whether this conforms with their requirements.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-AIR-3:</b> Where impacts to air quality may be significant under NEPA, requiring analysis through an Environmental Impact Statement, require documentation for activities to include a detailed discussion and analysis of Ambient Air Quality conditions (baseline or existing), National Ambient Air Quality Standards, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts and greenhouse gas emissions). This content is necessary to disclose the potential impacts from temporary or cumulative degradation of air quality. The discussion will include a description and estimate of air emissions from potential construction and maintenance activities, and proposed mitigation measures to minimize net 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.</p>	X			X		
				<ul style="list-style-type: none"> <li>• Baseline ambient air quality conditions are discussed in Section 3.2.1.2, and Table 3.2-3.</li> <li>• Federal and state ambient air quality standards are defined in Table 3.2-2.</li> <li>• Criteria pollutant nonattainment status is defined in Table 3.2-4.</li> <li>• The direct and indirect air quality impacts of the Project are quantified and described in Section 4.2.3.1.</li> <li>• Cumulative impacts to air quality are discussed in Section 4.2.6.</li> <li>• Greenhouse gas emissions are quantified and described in Section 4.8.3.1.</li> <li>• Best management practices to be followed by the Project are described in Section 2.3.7.6, Section 4.2.2, and Mitigation Measure AQ-1. These include a requirement for a Dust Control Plan.</li> </ul>		
<p><b>LUPA-AIR-4:</b> Because fugitive dust is the number one source of PM10 and PM2.5 emissions in the Mojave and Sonoran Deserts, fugitive dust impacts to air quality must be analyzed for all activities/projects requiring an Environmental Impact Statement and Environmental Assessment.</p> <p>The NEPA air quality analysis may include modelling of the sources of PM10 and PM2.5 that occur prior to construction and/or ground disturbance from the activity/project, and show the timing, duration and transport of emissions off site. When utilized, the modeling will also identify how the generation and movement of PM10 and PM2.5 will change during and after construction and/or ground disturbance of the activity/project under all activity/project specific NEPA alternatives. The BLM air resource specialist and Authorizing Officer will determine if modelling is required as part of the NEPA analysis based on estimated types and amounts of emissions.</p>	X			X		
				Section 4.2.1 discusses the methodology that was used to model the fugitive dust emissions. The modeling report is provided in Appendix W. Section 4.2.3.1 describes the results, including a discussion of the timing with respect to construction versus operations. BLM has determined that the modeling provides sufficient information to support a NEPA analysis.		
<p><b>LUPA-AIR-5:</b> A fugitive Dust Control Plan will be developed for all projects where the NEPA analysis shows an impact on air quality from fugitive dust</p>	X			X		
				Best management practices to be followed by the Project are described in Section 2.3.7.6, Section 4.2.2, and Mitigation Measure AQ-1. These include a requirement for a Dust Control Plan.		
<p><b>LUPA-CTTM-1:</b> Maintain and manage adequate Road, Primitive Road, and Trail Access to and within SRMAs, ERMA, OHV Open Areas, and Level 1, 2, and 3 Recreation Facilities.</p>	X			X		
				The Project would affect access roads to the Mule Mountains ACEC, which is a Level 3 recreation facility. The Applicant has identified alternative access routes, and Mitigation Measure REC-1 specifies measures to ensure that this access remains open.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-CTTM-2:</b> 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.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The Project would eliminate access to Tier 2 and 3 routes within the Project boundaries. The Applicant has identified alternative access routes, and Mitigation Measure REC-1 specifies measures to ensure that this access remains open.		
<b>LUPA-CTTM-3:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project is not located near the Mojave Trail. The EIS/EIR assesses the Bradshaw Trail, and shows that it terminates 4 miles from the Project area. There are no National Scenic and Historic Trails shown near the Project site on DRECP Figure D-27.					
<b>LUPA-CTTM-4:</b> 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.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The Project would eliminate access to Tier 2 routes within the Project boundaries. The Applicant has identified alternative access routes, and Mitigation Measure REC-1 specifies compensation in the form of signage and provision of a kiosk.		
<b>LUPA-CTTM-5:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (management of OHV use) which is not related to authorization of the Project.					
<b>LUPA-CTTM-6:</b> Manage Back Country Byways as a component of BLM Recreation and Travel and Transportation Management program.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (management of Back Country Byways) which is not related to authorization of the Project.					
<b>LUPA-CTTM-7:</b> Manage Recreation Facilities consistent with the objectives for the recreation management areas and facilities (see also Section II.4.2.1.10).	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (management of recreation facilities) which is not related to authorization of the Project.					
<b>LUPA-CUL-1:</b> 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).	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (tracking agency actions) which is not related to authorization of the Project.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
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.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (identifying areas for new field inventory) which is not related to authorization of the Project.					
LUPA-CUL-3: Identify places of traditional cultural and religious importance to federally recognized Tribes and maintain access to these locations for traditional use.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 3.5.1.6.5 describes how tribes were contacted, at the direction of Native American Heritage Commission and BLM, in order to identify information on Traditional Cultural Places (TCPs). The contact did not result in the identification of any previously unknown TCPs.		
LUPA-CUL-4: Design activities to minimize impacts on cultural resources including places of traditional cultural and religious importance to federally recognized Tribes.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Sections 4.5.3.2 and 4.5.3.3 describe how re-configuration of the Project footprint in Alternatives 2 and 3 (respectively) is designed to minimize impacts to 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (educating recreational users about cultural resources) which is not related to authorization of the Project.					
LUPA-CUL-6: Develop partnerships to assist in the training of groups and individuals to participate in site stewardship programs.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (developing partnerships) which is not related to authorization of the Project.					
LUPA-CUL-7: Coordinate with visual resources staff to ensure VRM Classes consider cultural resources and tribal consultation to include landmarks of cultural significance to Native Americans (TCPs, trails, etc.).	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (establishing VRM classes) which is not related to authorization of the Project.					
LUPA-CUL-8: Conduct regular contact and consultation with federally recognized Tribes and individuals, consistent with statute, regulation and policy.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The status of ongoing government-to-government consultation with Federally recognized tribes is discussed in Sections 1.9.1, 4.5.3.1, and 6.3.3.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
LUPA-CUL-9: Promote DRECP desert vegetation types/communities by avoiding them where possible, then use required compensatory mitigation, off-site mitigation, and other means to ensure Native American vegetation collection areas and practices are maintained.	Yes	No	Partial	Yes	No	Partial
	X			X		
				All alternatives avoid special desert vegetation types to the extent possible. No Native American collection areas are present.		
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.	Yes	No	Partial	Yes	No	Partial
		X				
	The desert fan palm oasis vegetation type/community is not present at the project site.					
LUPA-CUL-11: Promote and protect desert microphyll woodland vegetation type/communities to ensure Native American cultural values are maintained.	Yes	No	Partial	Yes	No	Partial
	X			X		
				All alternatives would avoid the microphyll woodland.		
LUPA-LANDS-1: Identify acquired lands as right-of-way exclusion areas when development is incompatible with the purpose of the acquisition.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not acquired lands.					
LUPA-LANDS-2: Prioritize acquisition of land within and adjacent to conservation designation allocations. Acquired land in any land use allocation in this Plan will be managed according to the applicable allocation requirements and/or for the purposes of the acquisition. Management boundaries for the allocation may be adjusted to include the acquired land if the acquisition lies outside the allocation area through a future land use plan amendment process.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (acquiring land) which is not related to authorization of the 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).	Yes	No	Partial	Yes	No	Partial
		X				
	The project is not within a land use allocation where renewable energy is not allowed.					
LUPA-LANDS-4: Nonfederal lands within the boundaries of BLM LUPA land use allocations are not affected by the LUPA.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project does not involve non Federal lands within the boundaries of BLM land use allocations. The private land parcel is non Federal land. Although it is surrounded on all sides by Federal land, it would not be considered to be within the boundaries of a BLM LUPA land use allocation.					
LUPA-LANDS-5: The MUCs used to determine land tenure in the CDCA Plan will be replaced by areas listed in the CMAs below.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA applies to BLM internal land acquisition, which is not associated with the project.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
LUPA-LANDS-6: Any activities on Catellus Agreement lands will be consistent with deed restrictions.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not associated with the Catellus lands.					
LUPA-LANDS-7: Any activities on Catellus Agreement lands will be subject to the approval of the California State Director.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not associated with the Catellus lands.					
LUPA-LANDS-8: The CDCA Plan requirement that new transmission lines of 161kV or above, pipelines with diameters greater than 12 inches, coaxial cables for interstate communications, and major aqueducts or canals for interbasin transfers of water will be located in designated utility corridors, or considered through the plan amendment process outside of designated utility corridors, remains unchanged. The only exception is that transmission facilities may be located outside of designated corridors within DFAs without a plan amendment. This CMA does not apply the Bishop and Bakersfield RMPs.	Yes	No	Partial	Yes	No	Partial
		X				
	The project is located within a DFA.					
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.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (land exchanges) which is not related to authorization of the Project.					
LUPA-LANDS-10: Prioritize land exchange proposals from the CSLC on available lands if there are competing land tenure proposals (e.g., land sale or exchange), CSLC proposals that enhance revenues for schools will generally be given priority.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (land exchanges) which is not related to authorization of the 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (establishing Standards of Rangeland Health) which is not related to authorization of the Project.					
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).	Yes	No	Partial	Yes	No	Partial
		X				
	The Project does not involve grazing permit/lease donations.					
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.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project is not located in the Bishop or Bakersfield RMPs.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-LIVE-4:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not within a grazing allotment, as shown on DRECP Figure D-21.					
<b>LUPA-LIVE-5:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not within a grazing allotment, as shown on DRECP Figure D-21.					
<b>LUPA-LIVE-6:</b> Complete the process for approving rangeland health standards and guidelines for the CDCA Plan (NEMO, WEMO, NECO and PSSCRMP).	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (establishing Standards of Rangeland Health) which is not related to authorization of the Project.					
<b>LUPA-LIVE-7:</b> Make Pilot Knob, Valley View, Cady Mountain, Cronese Lake, and Harper Lake allotments, allocations unavailable for livestock grazing and change to management for wildlife conservation and ecosystem function. Reallocate the forage previously allocated to grazing use in these allotments to wildlife and ecosystem functions. Pilot Knob was closed in the WEMO plan amendment. The Cronese Lake, Harper Lake, and Cady Mountain allotments were closed as mitigation for the impacts to the Agassiz's desert tortoise resulting from the Fort Irwin expansion. All forage allocated to livestock grazing in these allotments will be reallocated to wildlife use and ecosystem function.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not associated with any of the referenced grazing allotments.					
<b>LUPA-LIVE-8:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not associated with any of the referenced grazing allotments.					
<b>LUPA-LIVE-9:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not associated with any of the referenced grazing allotments.					
<b>LUPA-MIN-1:</b> High Potential Mineral Areas (identified in CA GEM data) <ul style="list-style-type: none"> <li>• These areas have been identified as mineral lands having existing and/or historic mining activity and a reasonable probability of future mineral resource development. These identified areas will be designated as mineral land polygons on DRECP maps, recognized as probable future development areas for planning purposes and allowable use areas.</li> <li>• If an activity is proposed in a High Potential Mineral Area, analyze and consider the mineral resource value in the NEPA analysis.</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not located in a High Potential Mineral Area, as shown on DRECP Figure D-22.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-MIN-2: Existing Mineral/Energy Operations</b> Existing authorized mineral/energy operations, including existing authorizations, modifications, extensions and amendments and their required terms and conditions, are designated as an allowable use within all BLM lands in the LUPA Decision Area, and unpatented mining claims subject to valid existing rights. Amendments and expansions authorized after the signing of the DRECP LUPA ROD are subject to applicable CMAs, including ground disturbance caps within Ecological and Cultural Conservation Areas, subject to valid existing rights, subject to governing laws and regulations.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not associated with existing authorized mineral/energy operations.					
<b>LUPA-MIN-3: Existing High Priority Mineral/Energy Operations Exclusion Areas</b> <ul style="list-style-type: none"> <li>Existing high-priority operation footprints and their identified expansion areas are excluded from DFA and conservation CMAs, but must comply with LUPA-wide CMAs subject to the governing laws and regulations.</li> <li>High priority operation exclusions are referenced by name with their respective footprint (acreage) below.</li> </ul> MolyCorp REE (General Legal Description: 35° 26'N; 115° 29'W)—10,490.9 surface acres Briggs Au, Etna (General Legal Description: 35° 56'N; 117° 11'W)—3,216.9 surface acres Cadiz Evaporites (General Legal Description: 34° 17'N; 115° 23'W)—2,591.5 surface acres Searles Dry Lake (Evaporate) Operation (General Legal Description: 35° 43'N; 117° 19'W)—72,000 surface acres Bristol Dry Lake (Evaporate) Operation (General Legal Description: 34° 29'N; 115° 43'W)—3,500 surface acres Mesquite Gold Mine (General Legal Description: 33° 04'N; 114° 59'W)—4,500 surface acres Hector Mine (Hectorite Clay) (General Legal Description: 34° 45'N; 116° 25'W)— 1,500 surface acres Castle Mountain/Viceroy Mine (Gold) (General Legal Description: 35° 17'N; 115° 3'W)—5,000 surface acres	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not associated with any of the referenced High Priority Mineral/Energy Operations Exclusion Areas,					
<b>LUPA-MIN-4: Access to Existing Operations</b> <ul style="list-style-type: none"> <li>Established designated, approved, or authorized access routes to the aforementioned existing authorized operations and areas will be designated as allowable uses.</li> <li>Access routes to Plans of Operations and Notices approved under 43 CFR 3809 will be granted subject to valid existing rights listed in 43 CFR 3809.100.</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not associated with any of the aforementioned existing authorized operations and areas.					
<b>LUPA-MIN-5: Areas Located Outside Identified Mineral Areas</b> <ul style="list-style-type: none"> <li>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.</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	The Project does not involve new or expanded mineral operations or geothermal energy.					
<b>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.</b>	Yes	No	Partial	Yes	No	Partial
		X				
	The Project does not involve new or expanded mineral operations.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-NRT-1:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (designating National Recreational Trails) which is not related to authorization of the Project.					
<b>LUPA-NRT-2:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not associated with the Nadeau NRT.					
<b>LUPA-PALEO-1:</b> If not previously available, prepare paleontological sensitivity maps consistent with the Potential Fossil Yield Classification for activities prior to NEPA analysis.	Yes	No	Partial	Yes	No	Partial
	X			X		
				A map showing the potential for paleontological resources, with respect to the Potential Fossil Yield Classification (PFYC), is provided in the Paleontological Resources Technical report in Appendix T.		
<b>LUPA-PALEO-2:</b> Incorporate all guidance provided by the Paleontological Resources Protection Act.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The requirements of the Paleontological Resources Preservation Act are presented in Appendix D.13. These requirements are incorporated into Applicant-Proposed Measures Paleo-1 and Paleo-2.		
<b>LUPA-PALEO-3:</b> Ensure proper data recovery of significant paleontological resources where adverse impacts cannot be avoided or otherwise mitigated.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Applicant-Proposed Measure Paleo-2 requires data recovery.		
<b>LUPA-PALEO-4:</b> Paleontological surveys and construction monitors are required for ground disturbing activities that require an EIS.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Applicant-Proposed Measure Paleo-1 requires pre-construction surveys. As discussed in Applicant-Proposed Measure Paleo-2, the results of the survey will be used to determine which areas require monitoring.		
<b>LUPA-REC-1:</b> Maintain, and where possible enhance, the recreation setting characteristics – physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The impact of the Project on the recreation setting is discussed in Sections 4.10.3.1 (associated with land use impacts), 4.14.3.1 (associated with impacts to recreational uses), and 4.19.3.1 (associated with impacts to visual character).		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-REC-2:</b> 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.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.14 of the EIS discusses impacts to recreation facilities, including those managed by BLM and those managed by other local communities and agencies. BLM has worked with local tribes to ensure that access is maintained to areas of interest. The EIS/EIR includes community outreach efforts and the ability of local communities and recreation service providers to review and comment regarding impacts to recreation.		
<b>LUPA-REC-3:</b> 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).	Yes	No	Partial	Yes	No	Partial
	X			X		
				The impact of the Project on the recreation setting is discussed in Sections 4.10.3.1 (associated with land use impacts), 4.14.3.1 (associated with impacts to recreational uses), and 4.19.3.1 (associated with impacts to visual character).		
<b>LUPA-REC-4:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	There are no Level 1 or 2 recreation facilities within one mile.					
<b>LUPA-REC-5:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	There are no Level 3 recreation facilities within one-half mile.					
<b>LUPA-REC-6:</b> Limit signage to that necessary for recreation facility/area identification, interpretation, education and safety/regulatory enforcement.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (providing signage at recreation facilities) which is not related to authorization of the Project.					
<b>LUPA-REC-7:</b> Refer to local RMPs, RMP amendments, and activity level planning for specially designated areas for Vehicular Stopping, Parking, and Camping limitations.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (establishing Vehicular Stopping, Parking, and Camping limitations) which is not related to authorization of the Project.					
<b>LUPA-REC-8:</b> Provide on-going maintenance of recreation and conservation facilities, interpretive and regulatory signs, roads, and trails.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (maintaining recreation and conservation facilities, interpretive and regulatory signs, roads, and trails) which is not related to authorization of the Project.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-SW-1:</b> Stipulations or conditions of approval for any activity will be imposed that provide appropriate protective measures to protect the quantity and quality of all water resources (including ephemeral, intermittent, and perennial water bodies) and any associated riparian habitat (see biological CMAs for specific riparian habitat CMAs). The water resources to which this CMA applies will be identified through the activity-specific NEPA analysis.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The water resources to which the CMA applies are identified in Sections 3.20.1.1 (groundwater) and 3.20.1.2 (surface water). Section 3.20.1.2 includes ephemeral washes.  Impacts to these resources are evaluated in Section 4.20.3. Applicant-Proposed Measures to protect water resources are discussed in Section 4.20.2, and mitigation measures are specified in Appendix G.20. Specific impacts and associated mitigation are addressed in the applicable CMAs below.		
<b>LUPA-SW-2:</b> Buffer zones, setbacks, and activity limitations specifically for soil and water (ground and surface) resources will be determined on an activity/site-specific basis through the environmental review process, and will be consistent with the soil and water resource goals and objectives to protect these resources. Specific requirements, such as buffer zones and setbacks, may be based, in part, on the results of the Water Supply Assessment defined below. In general, placement of long-term facilities within buffers or protected zones for soil and water resources is discouraged, but may be permitted if soil and water resource management objectives can be maintained.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Setbacks and activity limitations are defined for a variety of activities in order to protect soil and water resources. Applicant-Proposed activity limitations for protecting water resources are addressed in Section 4.9.2 for managing hazardous materials, and in Section 4.20.2 for construction activities. Section 4.9.2 establishes a buffer, prohibiting the storage of hazardous materials or re-fueling of vehicles within 100 feet of a wetland, water body, or water supply well. Mitigation Measure VEG-10.5 specifies that spoil sites shall not be located at least 30 feet from the boundaries and drainages or in locations that may be subjected to high storm flows, where spoils might be washed back into drainages.		
<b>LUPA-SW-3:</b> Where a seeming conflict between CMAs within or between resources arises, the CMA(s) resulting in the most resource protection apply.	Yes	No	Partial	Yes	No	Partial
	X			X		
				There is a conflict between CMAs that require avoidance of sand dunes and certain habitat (LUPA-BIO-3, BIO-13, BIO-DUNE-2, BIO-DUNE-4, BIO-PLANT-2, BIO-PLANT 3, and TRANS-BIO-4) and those CMAs that require that transmission lines be placed within CDCA Plan-approved utility corridors (LUPA-BIO-13, LANDS-9, and TRANS-BIO-4). This is because the approved utility corridor adjacent to the Project is coincident with an active sand dune area that supports habitat for Harwood's eriastrum and Mojave fringe-toed lizard. BLM has determined that use of the approved corridor, in combination with species avoidance and compensation measures, provides the most resource protection.		
<b>LUPA-SW-4:</b> Nothing in the "Exceptions" below applies to or takes precedence over any of the CMAs for biological resources.	Yes	No	Partial	Yes	No	Partial
	X			X		
				BLM has considered this CMA, and determined that none of the exceptions takes precedence over CMAs for biological resources.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-SW-5:</b> 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.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The Applicant has not requested any exceptions to the stipulations, at this time.		
<b>LUPA-SW-6:</b> In addition to the applicable required governmental safeguards, third party activities will implement up-to-date standard industry construction practices to prevent toxic substances from leaching into the soil.	Yes	No	Partial	Yes	No	Partial
	X			X		
				<ul style="list-style-type: none"> <li>Section 2.3.7.1 describes Hazardous Material and Waste Management procedures which are part of the Proposed Action, and Section 2.3.7.9 describes the Stormwater Management procedures.</li> <li>Section 4.20.2 describes the Applicant’s proposed Construction Stormwater Pollution Prevention Plan (SWPPP).</li> <li>Applicant-Proposed Measure BIO-2 specifies the construction related plans to be followed. These include plans to prevent toxic chemicals, hazardous materials, and other fluids from entering vegetation-type streams (Waste Management Plan, Spill Prevention Control and Countermeasures Plan, and Hazardous Materials Plan), and plans to address drainage, erosion, and sedimentation control (SWPPP).</li> <li>Applicant-Proposed Measure BIO-3 describes construction BMPs which address these topics.</li> <li>Mitigation Measure WATER-1 provides further specification of the requirements for the Construction SWPPP. Mitigation Measures WATER-2 describes further requirements of the Comprehensive Drainage, Stormwater, and Sedimentation Control Plan.</li> </ul>		
<b>LUPA-SW-7:</b> Prepare an emergency response plan, approved by the BLM contaminant remediation specialist, that ensures rapid response in the event of spills of toxic substances over soils.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Sections 2.3.7.1, 4.9.1, and 4.9.2 describe the Applicant’s Preliminary Hazardous Materials Management and Emergency Response Plan. Additional requirements for the Plan are provided in Mitigation Measures HAZ-1 and Fire-1.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-SW-8:</b> As determined necessary on an activity specific basis, prepare a site plan specific to major soil types present (≥5% of footprint or laydown surfaces) in Wind Erodibility Groups 1 and 2 and in Hydrology Soil Class D as defined by the USDA Natural Resource Conservation Service to minimize water and air erosion from disturbed soils on activity sites.	Yes	No	Partial	Yes	No	Partial
	X			X		
	The project is not situated in Hydrology Soil Class D, but is located in Wind Erodibility Groups 1 and 2.			The potential for wind erosion is evaluated in EIS/EIR Section 4.7.3.1. The Applicant proposes to prepare a SWPPP which would address erosion control. In addition, mitigation measures AIR-1 specifies the requirements for controlling fugitive dust emissions through a Dust Control Plan.		
<b>LUPA-SW-9:</b> 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.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Figure 3 of the BRTR shows that desert pavement was mapped, but is not present within the Project footprint. Mitigation Measure AIR-2 specifies requirements for stabilizing desert pavement, if it is found and disturbed.		
<b>LUPA-SW-10:</b> The extent of additional sensitive soil areas (cryptobiotic soil crusts, hydric soils, highly corrosive soils, expansive soils, and soils at severe risk of erosion) shall be mapped if it is anticipated that an activity will impact these resources. To the extent possible, avoid disturbance of desert biologically intact soil crusts, and soils highly susceptible to wind and water erosion.	Yes	No	Partial	Yes	No	Partial
			X	X		
	Hydric soils are not present in the area, as discussed in Section 4.2 of the Federal Jurisdictional Delineation Report, provided in Appendix I.  As discussed in Table 3 of the Federal Jurisdictional Delineation Report (Appendix I), biotic crusts were evaluated as a part of the jurisdictional delineation. No biotic crusts were identified. Mitigation Measure VEG-8.17 requires that revegetation include inoculation of microbial organisms for plant mycorrhizae and for biotic soil crust formation.			Sections 3.7.1.2 and 3.7.1.3 discuss expansive, corrosive, and erodible soils.		
<b>LUPA-SW-11:</b> Where possible, side casting shall be avoided where road construction requires cut- and-fill procedures.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Road construction using cut-and-fill procedures is not proposed as part of the Project.		
<b>LUPA-SW-12:</b> 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).	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is located in a DFA.					
<b>LUPA-SW-13:</b> BLM will manage all riparian areas to be maintained at, or brought to, proper functioning condition.	Yes	No	Partial	Yes	No	Partial
		X				
	The project site does not include any riparian areas.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-SW-14:</b> All relevant requirements of Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands) will be complied with.	Yes	No	Partial	Yes	No	Partial
		X				
	Section 3.3.1.3 discusses the results of the jurisdictional delineation, and shows that no wetlands are present on the Project site. A more detailed discussion of the investigation of wetlands, and conclusion that wetland vegetation is not present, is provided in Section 4.1 of the Federal Jurisdictional Delineation Report, provided in Appendix I.  The Project site is not located within a 100-year floodplain.					
<b>LUPA-SW-15:</b> Surface water diversion for beneficial use will not occur absent a state water right.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project does not include diversion of surface water for beneficial use.					
<b>LUPA-SW-16:</b> The 100-year floodplain boundaries for any surface water feature in the vicinity of the project will be identified. If maps are not available from the Federal Emergency Management Agency (FEMA), these boundaries will be determined via hydrologic modeling and analysis as part of the environmental review process. Construction within, or alteration of, 100-year floodplains will be avoided where possible, and permitted only when all required permits from other agencies are obtained.	Yes	No	Partial	Yes	No	Partial
	X			X		
				As discussed in Section 1.5.8 of the Federal Jurisdictional Delineation Report (Appendix I), FEMA has not conducted a flood hazard analysis of the Project area, so no FEMA flood zone designation exists. The impact of a 100-year flood on surface water flow has been modeled, to support the environmental review process. The modeling effort and results are described in the Drainage Report (Appendix V), and discussed in the EIS/EIR in Sections 3.20.1.2 and 4.20.3.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-SW-17:</b> An activity's groundwater extraction shall not contribute to exceeding the estimated perennial yield for the basin in which the extraction is taking place. Perennial yield is that quantity of groundwater that can be withdrawn from the groundwater basin without exceeding the long-term recharge of the basin or unreasonably affecting the basin's physical, chemical, or biological integrity. It is further clarified arithmetically below.	X			X		
				The perennial yield in the ground water basin has not been specifically calculated. The Applicant's Proposed Groundwater Use – Numerical Groundwater Modeling Report (Appendix X) presents the methodology and results from the analysis of proposed groundwater withdrawal. The groundwater budget presented in Table 3.20-1 is a variation of the formula for calculating change in storage and perennial yield in the CMA. However, the analysis uses different terminology, and does not specifically refer to perennial yield. The end product of the analysis is a calculation of the total cone of depression, based on a cumulative analysis of all known water uses in the basin. The methodology used was approved by BLM staff in conference calls and technical reviews before the modeling effort was done. The resulting Groundwater Modeling Report was also reviewed and approved by BLM staff.		
				The estimated groundwater balance from the basin is presented in Table 3.20-1, and discussed in Section 3.20.1.1. The analysis in Section 4.20.3 is based on estimated amount of drawdown, and concludes that the drawdown would be negligible compared to the thickness of the aquifer. To ensure that the actual groundwater drawdown does not exceed the predicted drawdown, Mitigation Measure Water-4 requires that the Applicant develop and implement a Groundwater Monitoring and Mitigation Plan prior to construction.		
<b>LUPA-SW-18:</b> 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.	X			X		
				There are no other uses proposed for the extracted groundwater, other than to support construction, operation, and decommissioning of the Project.		
<b>LUPA-SW-19:</b> Water flow meters shall be installed on all extraction wells permitted by BLM.	X			X		
				Mitigation Measure Water-4 specifies the groundwater monitoring requirements for the Project, including installation of flow meters.		
<b>LUPA-SW-20:</b> 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.	X			X		
				Section 4.20.7 discusses residual impacts to water resources, and concludes that changes to stormwater flow characteristics would be minor, even with implementation of mitigation measures.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-SW-21:</b> 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.	X			X		
				Impacts to existing hydrology are discussed in Section 4.20.3, which concludes that hydrology would likely be altered for the duration of ROW operation. The compacted and developed site could increase the rate, volume, and sediment load of storm water runoff traveling offsite. As discussed in Section 2.3.4.3, the site preparation components of the Project design were limited to minimize modification of surface water hydrology. As discussed in Sections 2.5 and 2.6, Alternatives 2 and 3 were specifically developed to avoid the locations of watercourses and drainages.		
<b>LUPA-SW-22:</b> 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.	X			X		
				Table 3.20-9 discusses the beneficial uses of the intermittent washes on the Project site. These include intermittent groundwater recharge, non-contact water recreation, and wildlife habitat. Section 4.20.3 evaluates impacts to surface water drainage patterns and water quality. The Applicant's proposed site preparation techniques (described in Section 2.3.4.3) and Mitigation Measures WATER-1 and WATER-2 are intended to minimize modifications to drainage patterns and water quality.		
<b>LUPA-SW-23:</b> 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.  Note – the text of the CMA is too lengthy to provide in full within this table. Please see the full text in Pages 142-145 of the DRECP.	X			X		
				The Applicant's Proposed Groundwater Use – Numerical Groundwater Modeling Report (Appendix X) presents the methodology and results from the analysis of proposed groundwater withdrawal.  The groundwater budget presented in Table 3.20-1 is a variation of the formula for calculating change in storage and perennial yield in the CMA. However, the analysis uses different terminology, and does not specifically refer to perennial yield. The end product of the analysis is a calculation of the total cone of depression, based on a cumulative analysis of all known water uses in the basin. The methodology used was approved by BLM staff in conference calls and technical reviews before the modeling effort was done. The resulting Groundwater Modeling Report was also reviewed and approved by BLM staff.  To ensure that the actual groundwater drawdown does not exceed the predicted drawdown, Mitigation Measure Water-4 requires that the Applicant develop and implement a Groundwater Monitoring and Mitigation Plan prior to construction.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-SW-24:</b> A Groundwater Monitoring and Reporting Plan, and Mitigation Action Plan shall be prepared to verify the Water Supply Assessment and adaptively manage water use as part of project operations. This plan shall be approved by BLM, in coordination with USFWS, CDFW, and other agencies as appropriate, prior to the development, extraction, injection, or consumptive use of any water resource. The quality and quantity of all surface water and groundwater used for the project shall be monitored and reported using this plan. Groundwater monitoring includes measuring the effects of a project’s groundwater extraction on groundwater surface elevations, groundwater flow paths, changes to groundwater-dependent vegetation, and of aquifer recovery after project decommissioning. Surface water monitoring, if applicable, shall monitor for changes in the flows, water volumes, channel characteristics, and water quality as a result of a project’s surface water use. Monitoring frequency and geographic scope and reporting frequency shall be decided on a project and site-specific basis and in coordination with the appropriate agencies that manage the water and land resources of the region. The geographic scope may include at the very least, all basins/sub-basins that potentially receive inflow from the basin where the proposed project may be sited, and all basins/sub-basins that may potentially contribute inflow to the basin where the proposed project is located. The plan shall also detail any mitigation measures that may be required as a result of the project. This plan and all monitoring results shall be made available to BLM. BLM will make the plan and results available to USFWS, CDFW, and other applicable agencies.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure Water-4 requires that the Applicant develop and implement a Groundwater Monitoring and Mitigation Plan prior to construction.		
<p><b>LUPA-SW-25:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure Water-4 (Groundwater Monitoring and Mitigation Plan) requires that, if significant drawdown occurs at offsite wells, the Applicant shall immediately reduce groundwater pumping until water levels stabilize or recover.		
<p><b>LUPA-SW-26:</b> Groundwater pumping mitigation shall be imposed if groundwater monitoring data indicate impacts on water-dependent resources that exceed those anticipated and otherwise mitigated for in the NEPA analysis and ROD, even if the basin’s perennial yield is not exceeded. Water-dependent resources include riparian or phreatophytic vegetation, springs, seeps, streams, and other approved domestic or industrial uses of groundwater. Mitigation measures may include changes to pumping rates, volume, or timing of water withdrawals; coordinating and scheduling groundwater pumping activities in conjunction with other users in the basin; acquisition of project water from outside the basin; and/or replenishing the groundwater resource over a reasonably short timeframe. For permitted activities, permittees may also be required to contribute funds to basin-wide groundwater monitoring networks in basins such as those encompassed by the East Riverside DFA or in the Calvada Springs/South Pahrump Valley area, and to cooperate in the compilation and analysis of groundwater data.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure Water-4 (Groundwater Monitoring and Mitigation Plan) requires that, if significant drawdown occurs at offsite wells, the Applicant shall immediately reduce groundwater pumping until water levels stabilize or recover.		
<p><b>LUPA-SW-27:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				The Applicant proposes to develop a ground water monitoring and mitigation plan approved by the BLM.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-SW-28:</b> 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.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.20.3 discusses the groundwater withdrawal with respect to the Accounting Surface methodology, including whether the Applicant would be required to obtain an allocation of water from the Colorado River. BLM has determined that the existing groundwater and technical report conforms to this CMA.		
<b>LUPA-SW-29:</b> 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 <b>LUPA-SW-26</b> for potential mitigation measures.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure Water-4 (Groundwater Monitoring and Mitigation Plan) requires that, if significant drawdown occurs at offsite wells, the Applicant shall immediately reduce groundwater pumping until water levels stabilize or recover. The wells to be monitored, including whether it would include wells outside of the DRECP (i.e., in Arizona), are not specified. However, as discussed in Section 4.20.3, the modeled drawdown is expected to be negligible at the Project boundary. Therefore, it is highly unlikely that effects would extend several miles offsite.		
<b>LUPA-SW-30:</b> Activities shall comply with local requirements for any long term or short term domestic water use and wastewater treatment.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Appendix D.20 discusses local permitting requirements for drinking and sanitary water supplies. Section 2.3.3.9 discusses the local (county) permits that would be obtained to address sanitary waste disposal.		
<b>LUPA-SW-31:</b> The siting, construction, operation, maintenance, remediation, and abandonment of all wells shall conform to specifications contained in the California Department of Water Resources Bulletins #74-81 and #74-90 and their updates.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Appendix D.20 specifies these requirements as applicable to the Project.		
<b>LUPA-SW-32:</b> Colorado River hydrologic basin - The concepts, principles and general methodology used in the Colorado River Accounting Surface Method, as defined in U.S. Geological Survey Scientific Investigations Report 2008-5113 (USGS 2009), and existing and future updates or a similar methodology, are considered the best available data for assessing activity/project related ground water impacts in the Colorado River hydrologic basin. The best available data and methodology shall be used to determine whether activity/project-related pumping would result in the extracted water being replaced by water drawn from the Colorado River. If activity/project-related groundwater pumping results in the static groundwater level at the well being near (within 1 foot), equal to, or below the Accounting Surface in a basin hydrologically connected to the Colorado River, that consumption shall be considered subject to the Law of the River (Colorado River Compact of 1922 and amendments). In such circumstances, BLM shall require the applicant to offset or otherwise mitigate the volume of water causing drawdown below the Accounting Surface. Details of such mitigation measures and the right to the use of water shall be described in the Groundwater Water Monitoring and Mitigation Plan.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.20.3 discusses the groundwater withdrawal with respect to the Accounting Surface methodology, including whether the Applicant would be required to obtain an allocation of water from the Colorado River. BLM has determined that the existing groundwater and technical report conforms to this CMA.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-SW-33:</b> Stipulations for groundwater development in the proximity of Devils Hole: Any development scenario for an activity within 25 miles of Devils Hole shall include a plan to achieve zero-net or net-reduced groundwater pumping to reduce the risk of adversely affecting senior federal reserved water rights, the designated critical habitat of the endangered Devils Hole pupfish, and the free-flowing requirements of the Wild and Scenic Amargosa River. This plan will require operators to acquire one or more minimization water rights (MWRs) in the over-appropriated, over-pumped, and hydraulically connected Amargosa Desert Hydrographic Basin in Nevada. The MWR(s) shall be: (1) an amount equal (at minimum) to that which is needed for construction and operations; (2) historically fully utilized, preferably for agricultural use; and (3) senior and closer to Devils Hole than the proposed point of diversion.	Yes	No	Partial	Yes	No	Partial
		X				
	The project site is not located within 25 miles of Devils Hole.					
<b>LUPA-SW-34:</b> Stipulations for groundwater development in the Calvada Springs/South Pahrump Valley area: Activities in this area shall be required to acquire one or more MWRs in the Pahrump Valley Hydrographic Basin in Nevada. The acquired MWR(s) must: (1) be at least equal to the amount proposed to be required and actually used for project construction and operations; and (2) be fully utilized for at least the prior ten years.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not located in the Calvada Springs/South Pahrump Valley area.					
<b>LUPA-SW-35:</b> 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. The analysis or analyses shall include: <ul style="list-style-type: none"> <li>• Potential impacts on the water balances of groundwater basins within these parks and preserves</li> <li>• A map identifying all potentially impacted surface water resources in the vicinity of the project, including a narrative discussion of the delineation methods used to discern those surface waters in the field</li> <li>• Any project-related modifications to surface water resources, both temporary and permanent</li> <li>• Analysis of any potential impacts on perennial streams, intermittent streams, and ephemeral drainages that could negatively impact natural riparian buffers</li> <li>• Impacts of any project proposed truncation, realignment, channelization, lining, or filling of surface water resources that could change drainage patterns, reduce available riparian habitat, decrease water storage capacity, or increase water flow velocity or sediment deposition, in particular where stormwater diverted around or through the project site is returned to natural drainage systems downslope of the project</li> <li>• Any potential indirect project-related causes of hydrologic changes that could exacerbate flooding, erosion, scouring, or sedimentation in stream channels</li> <li>• Alternatives and mitigation measures proposed to reduce or eliminate such impacts</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not in the vicinity of Death Valley, Joshua Tree, or Mojave National Preserve.					
<b>LUPA-VRM-1:</b> Manage Visual Resources in accordance with the VRM classes shown on Figure 9.	Yes	No	Partial	Yes	No	Partial
		X				
	This CMA is overridden by DFA-VRM-1.					
<b>LUPA-VRM-2:</b> Ensure that activities within each of the VRM Class polygons meets the VRM objectives described above, as measured through a visual contrast rating process.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.19.1.1 describes the Visual Contrast Rating process used to evaluate the Project with respect to the applicable VRM Class.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-VRM-3:</b> Ensure that transmission facilities are designed and located to meet the VRM Class objectives for the area in which they are located. New transmission lines routed through designated corridors where they do not meet VRM Class Objectives will require RMP amendments to establish a conforming VRM Objective. All reasonable effort must be made to reduce visual contrast of these facilities in order to meet the VRM Class before pursuing RMP amendments. This includes changes in routing, using lattice towers (vs. monopole), color treating facilities using an approved color from the BLM Environmental Color Chart CC-001 (dated June 2008, as updated on April 2014, or the most recent version) (vs. galvanized) on towers and support facilities, and employing other BMPs to reduce contrast. Such efforts will be retained even if an RMP amendment is determined to be needed. Visual Resource BMPs that reduce adverse visual contrast will be applied in VRM Class conforming situations. For a reference of BMPs for reducing visual impacts see the “Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands”, available at <a href="http://www.blm.gov/style/medialib/blm/wo/MINERALS_REALTY_AND_RESOURCE_PROTECTION_/energy/renewable_references.Par.1568.File.dat/RenewableEnergy_VisualImpacts_BMPs.pdf">http://www.blm.gov/style/medialib/blm/wo/MINERALS_REALTY_AND_RESOURCE_PROTECTION_/energy/renewable_references.Par.1568.File.dat/RenewableEnergy_VisualImpacts_BMPs.pdf</a> , or the most recent version of the document or BMPs for VRM, as determined by BLM.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure VIS-1 describes design elements, including structure and color requirements, as well as additional lighting requirements, which will be required to reduce visual impacts. The measure includes requirements for the gen-tie line, and references the Best Management Practices document.		
<b>LUPA-WC-1:</b> Complete an inventory of areas for proposed activities that may impact wilderness characteristics if an updated wilderness characteristics inventory is not available.	Yes	No	Partial	Yes	No	Partial
		X				
	Section 3.16.1.3 discusses the recent inventory, conducted in 2016.					
<b>LUPA-WC-2:</b> Employ avoidance measures as described under DFAs and approved transmission corridors.	Yes	No	Partial	Yes	No	Partial
		X				
	Section 4.16.3.1 discusses the closest land with wilderness characteristics, which are more than 10 miles away.					
<b>LUPA-WC-3:</b> For inventoried lands found to have wilderness characteristics but not managed for those characteristics compensatory mitigation is required if wilderness characteristics are directly impacted. The compensation will be: <ul style="list-style-type: none"> <li>• 2:1 ratio for impacts from any activities that impact those wilderness characteristics, except in DFAs and transmission corridors</li> <li>• 1:1 ratio for impact from any activities that impact the wilderness characteristics in DFAs and transmission corridors</li> </ul> Wilderness compensatory mitigation may be accomplished through acquisition and donation, by willing landowners, to the federal government of (a) wilderness inholdings, (b) wilderness edge holdings that have inventoried wilderness characteristics, or (c) other areas within the LUPA Decision Area that are managed to protect wilderness characteristics. Restoration of impaired wilderness characteristics in Wilderness, Wilderness Study Area, and lands managed to protect wilderness characteristics could be substituted for acquisition.	Yes	No	Partial	Yes	No	Partial
		X				
	Section 4.16.3.1 discusses the closest land with wilderness characteristics, which are more than 10 miles away.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-WC-4:</b> For areas identified to be managed to protect wilderness characteristics, identified in Figure 7, the following CMAs are required: <ul style="list-style-type: none"> <li>• Include a no surface occupancy stipulation for any leasable minerals with no exceptions, waivers, or modifications.</li> <li>• Exclude these areas from land use authorizations, including transmission.</li> <li>• Close areas to construction of new roads and routes. Vehicles will continue to be permitted on existing designated routes.</li> <li>• Close areas to mineral material sales.</li> <li>• Prohibit commercial or personal-use permits for extraction of materials (e. g. no wood-cutting permits).</li> <li>• Manage the area as VRM II.</li> <li>• Require that new structures and facilities are related to the protection or enhancement of wilderness characteristics or are necessary for the management of uses allowed under the land use plan.</li> <li>• Make lands unavailable for disposal from federal ownership.</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not located in an area managed to protect wilderness characteristics, as shown in DRECP Figure 7.					
<b>LUPA-WC-5:</b> Manage the following Wilderness Inventory Units to protect wilderness characteristics: (see list on Pages 152 to 153 of the DRECP)	Yes	No	Partial	Yes	No	Partial
		X				
	The Wilderness Inventory Units associated with the Project site (1351 and 1351A-1, see Section 4.16.3.1) are not among the units listed within this CMA.					
<b>LUPA-TRANS-BIO-1:</b> Where feasible and appropriate for resource protection, site transmission activities along roads or other previously disturbed areas to minimize new surface disturbance, reduce perching opportunities for the Common Raven, and minimize collision risks for birds and bats.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 2.3.3.2 describes the location of the proposed gen-tie line which is in an existing, previously disturbed utility corridor, with existing access roads.		
<b>LUPA-TRANS-BIO-2:</b> Flight diverters will be installed on all transmission activities spanning or within 1,000 feet of stream and wash channels, canals, ponds, and any other natural or artificial body of water. The type of flight diverter selected will be subject to approval by BLM, in coordination with USFWS and CDFW as appropriate, and will be based on the best available scientific and commercial data regarding the prevention of bird collisions with transmission and guy wires.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site does not include any water bodies.					
<b>LUPA-TRANS-BIO-3:</b> 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.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The gen-tie alignment does not cross any canyons or ridgelines.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-TRANS-BIO-4:</b> Siting of transmission activities will be prioritized within designated utility corridors, where possible, and designed to avoid, where possible, and otherwise minimize and offset impacts to sand transport processes in Aeolian corridors, rare vegetation alliances and Focus and BLM Special Status Species. Transmission substations will be sited to avoid Aeolian corridors, rare vegetation alliances, and sand-dependent Focus and BLM Special Status Species habitats.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 2.3.3.2 describes the location of the proposed gen-tie line which is in an existing, previously disturbed utility corridor. Table 4.3-3 evaluates the impact of the gen-tie line on special status plants, and shows that impacts would occur to Harwood's eriastrum under the Proposed Action, but not under Alternatives 2 or 3. Table 4.4.3 evaluates the impact of the gen-tie line on special status wildlife, and shows that impacts would occur to Mojave fringe-toed lizard under all alternatives.		
<b>LUPA-TRANS-CUL-1:</b> 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: <ul style="list-style-type: none"> <li>All appropriate costs associated with the BLM's analysis of the DRECP geodatabase and other sources for cultural resources sensitivity.</li> <li>All appropriate costs associated with preliminary sensitivity analysis.</li> <li>All appropriate costs associated with the Section 106 process including the identification and defining of cultural resources. These costs may also include logistical, travel, and other support costs incurred by tribes in the consultation process.</li> <li>All appropriate costs associated with updating the DRECP cultural resources geodatabase with project specific results.</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	BLM will address costs and fees associated with cultural resources through the Section 106 process.					
<b>LUPA-TRANS-CUL-2:</b> Consistent and in compliance with the NHPA Programmatic Agreement, signed February 5, 2016, or the most up to date signed version – for transmission (and renewable energy) activities, a compensatory mitigation fee will be required within the LUPA Decision Area to address cumulative and some indirect adverse effects to historic properties. The mitigation fee will be calculated in a manner that is commensurate to the size and regional impacts of the project. Refer to the NHPA Programmatic Agreement for details regarding the mitigation fee.	Yes	No	Partial	Yes	No	Partial
		X				
	BLM will address costs and fees associated with cultural resources through the Section 106 process.					
<b>LUPA-TRANS-CUL-3:</b> For transmission (and renewable energy) activities, the management fee rate will be determined through the NHPA programmatic Section 106 consultation process that will be completed as part of the DRECP land use plan amendment.	Yes	No	Partial	Yes	No	Partial
		X				
	BLM will address costs and fees associated with cultural resources through the Section 106 process.					
<b>LUPA-TRANS-CUL-4:</b> For transmission (and renewable energy) activities, demonstrate that results of cultural resources sensitivity, based on the DRECP geodatabase, and other sources, are used as part of the initial planning pre-application process and to select of specific footprints for further consideration.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.5 discusses how the footprints of alternatives were developed specifically to avoid cultural resources. All surveys were conducted in accordance with protocols in place at the time of the NOI, under the direction of BLM cultural staff assigned to the Project.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>LUPA-TRANS-CUL-5:</b> For transmission (and renewable energy) activities, provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 3.5.1.6.6 discusses the protocols used for the field inventory investigations.		
<b>LUPA-TRANS-CUL-6:</b> For transmission (and renewable energy) activities, provide justification in the application why the project considerations merit moving forward if the specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The POD and Chapter 1 of the EIS/EIR identify the Purpose and Need of the project, which provides the justification.		
<b>LUPA-TRANS-CUL-7:</b> For transmission (and renewable energy) activities, complete the NHPA Section 106 Process as specified in 36 CFR Part 800, or via an alternate procedure, allowed for under 36 CFR Part 800.14 prior to issuing a ROD or ROW grant on any utility- scale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.5.3.1 evaluates the Project with respect to the NHPA Section 106 Process.		
<b>LUPA-TRANS-WC-1:</b> Allow transmission activities in areas inventoried and identified as lands with wilderness characteristics.	Yes	No	Partial	Yes	No	Partial
		X				
				Section 4.16.3.1 discusses the closest land with wilderness characteristics, which are more than 10 miles away.		
<b>LUPA-TRANS-WC-2:</b> For inventoried lands found to have wilderness characteristics impacted by transmission activities, compensatory mitigation is required at a 1:1 ratio if wilderness characteristics are directly impacted. This may be accomplished through acquisition and donation, from willing landowners, to the federal government of (a) wilderness inholdings, (b) wilderness edge holdings that have inventoried wilderness characteristics, or (c) other areas within the LUPA Decision Area that are managed to protect wilderness characteristics. Restoration of impaired wilderness characteristics in Wilderness, Wilderness Study Area, and lands managed to protect wilderness characteristics could be substituted for acquisition.	Yes	No	Partial	Yes	No	Partial
		X				
				Section 4.16.3.1 discusses the closest land with wilderness characteristics, which are more than 10 miles away.		
<b>LUPA-COMP-1:</b> 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).  • BLM will determine, in the environmental analysis, the activity/project-level timing of the compensation (i.e. initiated, completed or a combination) based on the specific resources being impacted, and scope and content of the activity.  • A 6 month extension may be authorized, subject to approval by the authorizing officer, dependent on the resources impacted and compensation due diligence of the project developer.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The mitigation measures which require compensatory mitigation (Mitigation Measure VEG-9C, WIL-4, WIL-9.3, and WIL-10) each specify a timeframe in which compensatory mitigation must be completed.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>LUPA-COMP-2:</b> 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.</p> <ul style="list-style-type: none"> <li>• BLM will determine, in the environmental analysis, the activity/project-level timing of its compensation (i.e. initiated, completed or a combination) based on the specific resources being impacted, and scope and content of its activity.</li> </ul> <p>-The estimated costs and 12 month timing of required compensation will be built into the activity/project design and environmental analysis.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	The Project is not a BLM initiated activity.					
<p><b>DFA-VPL-BIO-DUNE-1:</b> Activities in DFAs and VPLs, including transmission substations, will be sited to avoid dune vegetation (i.e., North American Warm Desert Dune and Sand Flats). Unavoidable impacts (see “unavoidable impacts to resources” in the Glossary of Terms) to dune vegetation will be limited to transmission projects, except transmission substations, and access roads that will be sited to minimize unavoidable impacts.</p> <ul style="list-style-type: none"> <li>• For unavoidable impacts (see “unavoidable impacts to resources” in the Glossary of Terms) to dune vegetation, the following will be required: <ul style="list-style-type: none"> <li>• Access roads will be unpaved.</li> <li>• Access roads will be designed and constructed to be at grade with the ground surface to avoid inhibiting sand transportation.</li> </ul> </li> </ul>	Yes	No	Partial	Yes	No	Partial
	X					X
				None of the alternatives would completely avoid the sand dunes. All alternatives would have unavoidable impacts to sand deposits, and not just for the transmission component of the Project.  Section 2.3.4.3 discusses the access roads, which would be unpaved. However, the description of the access roads does not specify that they will be at-grade, and there is no mitigation measure requiring that they be at-grade.		
<p><b>DFA-VPL-BIO-DUNE-2:</b> Within Aeolian corridors that transport sand to dune formations and vegetation types downwind inside and outside of the DFAs, all activities will be designed and operated to facilitate the flow of sand across activity sites, and avoid the trapping or diverting of sand from the Aeolian corridor. Buildings and structures within the site will take into account the direction of sand flow and, to the extent feasible, build and align structures to allow sand to flow through the site unimpeded. Fences will be designed to allow sand to flow through and not be trapped.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is located within the mapped Dune/Sand area on DRECP Figure D-15, which is also shown on Figure 3.3-2 of the EIS/EIR. Appendix D of DRECP does not provide a specific definition of whether that specific corridor is one that transports “sand to dune formations and vegetation types downwind inside and outside of the DFAs”. The analysis in Section 3.3.1.1 shows that the sand dunes on the Project area do not transport sand to dunes or habitat downwind (east) of the Project site.					
<p><b>DFA-VPL-BIO-IFS-1:</b> To the maximum extent practicable (see Glossary of Terms), activities will be sited in previously disturbed areas, areas of low quality habitat, and areas with low habitat intactness in desert tortoise linkages and the Ord-Rodman TCA, identified in Appendix D.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				As discussed in Section 3.4.1.1, the Project is sited in an area of low quality habitat.		
<p><b>DFA-VPL-BIO-IFS-2:</b> Within the Mohave ground squirrel range configure solar panel and wind turbine arrays to allow areas of native vegetation that will facilitate Mohave ground squirrel movement through the project site. This may include raised and/or rotating solar panels or open space between rows of panels or turbines. Fences surrounding sites should be permeable for Mohave ground squirrels.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>DFA-VPL-BIO-BAT-1:</b> Wind projects will not be sited within 0.5 mile of any occupied or presumed occupied maternity roost.	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not a wind project.					
<b>DFA-VPL-BIO-FIRE-1:</b> Implement the following standard practice for fire prevention/protection:  <ul style="list-style-type: none"> <li>Implement site-specific fire prevention/protection actions particular to the construction and operation of renewable energy and transmission project that include procedures for reducing fires while minimizing the necessary amount of vegetation clearing, fuel modification, and other construction-related activities. At a minimum these actions will include designating site fire coordinators, providing adequate fire suppression equipment (including in vehicles), and establishing emergency response information relevant to the construction site.</li> </ul>	Yes	No	Partial	Yes	No	Partial
	X			X		
				The Project's fire prevention actions are discussed in Section 4.21.3.1.		
<b>DFA-VPL-BIO-COMP-1:</b> Impacts to biological resources from all activities in DFAs and VPLs will be compensated using the same ratios and strategies as LUPA-BIO-COMP-1 through 4, with the exception identified below in DFA-VPL-BIO-COMP-2.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure VEG-9D specifies compensatory mitigation requirements for state and Federally protected plant species, if necessary. Mitigation Measure VEG-10 specifies compensatory mitigation for riparian areas and state waters. Mitigation Measure WIL-4 specifies compensatory mitigation requirements for desert tortoise. Mitigation Measure WIL-9.3 specifies compensatory mitigation requirements for burrowing owl. Mitigation Measure WIL-10 specifies compensatory mitigation requirements for Mojave fringe-toed lizard.		
<b>DFA-VPL-BIO-COMP-2:</b> Exception to the biological resources standard compensation ratio of 1:1 - desert tortoise intact linkage habitat compensation ratio of 2:1 applies to the identified modeled intact linkage habitat (Appendix D) in two linkages—Ord-Rodman critical habitat unit to Joshua Tree National Park, and Fremont-Kramer critical habitat unit to the Ord-Rodman critical habitat unit, as identified in Appendix D. Maintenance and enhancement of the function of these two linkages is essential to the function of the Ord-Rodman critical habitat unit.	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not located in any of the referenced linkages or critical habitat units.					
<b>DFA-VPL-CTTM-1:</b> 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.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The Project would eliminate access to Tier 2 and 3 routes within the Project boundaries. The Applicant has identified alternative access routes, and Mitigation Measure REC-1 specifies measures to ensure that this access remains open.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>DFA-VPL-CTTM-2:</b> 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.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The Project would eliminate access to Tier 2 routes within the Project boundaries. The Applicant has identified alternative access routes, and Mitigation Measure REC-1 specifies compensation in the form of signage and provision of a kiosk.		
<b>DFA-VPL-CUL-1:</b> For renewable energy activities and transmission, require the applicant to pay all appropriate costs associated with the following processes, through the appropriate BLM funding mechanism:  <ul style="list-style-type: none"> <li>All appropriate costs associated with the BLM's analysis of the DRECP geodatabase and other sources for cultural resources sensitivity.</li> <li>All appropriate costs associated with preliminary sensitivity analysis.</li> <li>All appropriate costs associated with the Section 106 process including the identification and defining of cultural resources. These costs may also include logistical, travel, and other support costs incurred by tribes in the consultation process.</li> <li>All appropriate costs associated with updating the DRECP cultural resources geodatabase with project specific results.</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
				BLM will address costs and fees associated with cultural resources through the Section 106 process.		
<b>DFA-VPL-CUL-2:</b> Consistent and in compliance with the NHPA Programmatic Agreement, signed February 5, 2016, or the most up to date signed version -for renewable energy activities and transmission, a compensatory mitigation fee will be required within the LUPA Decision Area to address cumulative and some indirect adverse effects to historic properties. The mitigation fee will be calculated in a manner that is commensurate to the size and regional impacts of the project. Refer to the Programmatic Agreement for details regarding the mitigation fee.	Yes	No	Partial	Yes	No	Partial
		X				
				BLM will address costs and fees associated with cultural resources through the Section 106 process.		
<b>DFA-VPL-CUL-3:</b> For renewable energy activities and transmission, the management fee rate will be determined through the NHPA programmatic Section 106 consultation process that will be completed as part of the DRECP land use plan amendment.	Yes	No	Partial	Yes	No	Partial
		X				
				BLM will address costs and fees associated with cultural resources through the Section 106 process.		
<b>DFA-VPL-CUL-4:</b> For renewable energy activities and transmission, demonstrate that results of cultural resources sensitivity, based on the DRECP geodatabase, and other sources, are used as part of the initial planning pre-application process and to select of specific footprints for further consideration.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.5 discusses how the footprints of alternatives were developed specifically to avoid cultural resources. All surveys were conducted in accordance with protocols in place at the time of the NOI, under the direction of BLM cultural staff assigned to the Project.		
<b>DFA-VPL-CUL-5:</b> For renewable energy activities and transmission, provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 3.5.1.6.6 discusses the protocols used for the field inventory investigations.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>DFA-VPL-CUL-6:</b> For renewable energy activities and transmission, provide justification in the application why the project considerations merit moving forward if the specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM.	Yes	No	Partial	Yes	No	Partial
	X			X		
				The POD and Chapter 1 of the EIS/EIR identify the Purpose and Need of the project, which provides the justification.		
<b>DFA-VPL-CUL-7:</b> For renewable energy activities and transmission, complete the NHPA Section 106 Process as specified in 36 CFR Part 800, or via an alternate procedure, allowed for under 36 CFR Part 800.14 prior to issuing a ROD or ROW grant on any utility-scale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.5.3.1 evaluates the Project with respect to the NHPA Section 106 Process.		
<b>DFA-VPL-LIVE-1:</b> Avoid siting solar developments in active livestock grazing allotments. If a ROW is granted for solar development in an active livestock grazing allotment, prior to solar projects being constructed in active livestock allotments, an agreement must be reached with the grazing permittee/lessee on the 2-year notification requirements. If any rangeland improvements such as, but not limited to, fences, corrals, or water storage projects, are to be impacted by energy projects, reach agreement with the BLM and the grazing permittee/lessee on moving or replacing the range improvement. This may include the costs for NEPA, clearances, and materials.	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not within a grazing allotment, as shown on DRECP Figure D-21.					
<b>DFA-VPL-LIVE-2:</b> 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.	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not a wind project, and is not in a condor use area.					
<b>DFA-VPL-LIVE-3:</b> Include no surface occupancy stipulation on geothermal leases in active grazing allotments.	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not within a grazing allotment, as shown on DRECP Figure D-21.					
<b>DFA-VPL-VEG-1:</b> Vegetative Use Authorizations: Commercial collection of seed in DFAs and VPLs is an allowable use. CMA's within these areas apply to this kind of activity.	Yes	No	Partial	Yes	No	Partial
		X				
	Project does not include commercial collection of seeds.					
<b>DFA-VPL-VRM-1:</b> Encourage development in a planned fashion within DFAs (e.g., similar to the planned unit development concept used for urban design—i.e., in-fill vs. scattered development, use of common road networks, Generator Tie Lines etc., use of similar support facility designs materials and colors etc.) to avoid industrial sprawl.	Yes	No	Partial	Yes	No	Partial
	X				X	
				The Proposed Action would conform to the requirement to co-locate the gen-tie line with other transmission lines to the extent possible, by using the most direct (shortest) route between the Onsite Substation and the corridor. Alternatives 2 and 3, described in Sections 2.5 and 2.6, respectively, would not conform, because the gen-tie line would not be co-located with existing lines for approximately half of its length.		
<b>DFA-VPL-VRM-2:</b> Development in DFAs and VPLs are required to incorporate visual design standards and include the best available, most recent BMPs, as determined by BLM (e.g. Solar, Wind, West Wide Energy Corridor, and Geothermal PEISs, the “Best Management Practices for Reducing Visual Impacts of Renewable	Yes	No	Partial	Yes	No	Partial
	X			X		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
<i>Energy Facilities on BLM-Administered Lands</i> ”, and other programmatic BMP documents).				Mitigation Measure VIS-1 describes design elements, including structure and color requirements, which will be required to reduce visual impacts. This measure references the requirements of the “ <i>Best Management Practices</i> ” document.		
<b>DFA-VPL-VRM-3: Required Visual Resource BMPs.</b> All development within the DFAs and VPLs will abide by the BMPs addressed in the most recent version of the document “ <i>Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands</i> ”, or its replacement, including, but not limited to the following: <ul style="list-style-type: none"> <li>• Transmission:                             <ul style="list-style-type: none"> <li>• Color-treat monopoles Shadow Gray per the BLM Environmental Color Chart CC001 unless a more effective color choice is selected by the local Field Office VRM specialist.</li> <li>• Lattice towers and conductors will have non-specular qualities.</li> <li>• Lattice Towers will be located a minimum of 3/4 miles away from Key Observation Points such as roads, scenic overlooks, trails, campgrounds, navigable rivers and other areas people tend to congregate and located against a landscape backdrop when topography allows.</li> </ul> </li> <li>• Solar – Color treat all facilities Shadow Gray from the BLM Environmental Color Chart CC001 unless a more effective color is selected by the Field Office VRM specialist, including but not limited to:                             <ul style="list-style-type: none"> <li>• Concentrated solar thermal parabolic trough panel backs</li> <li>• Solar power tower heliostats</li> <li>• Solar power towers</li> <li>• Cooling towers</li> <li>• Power blocks</li> </ul> </li> <li>• Wind – Color treat all facilities Shadow Gray with the exception of the wind turbine and towers 200 vertical feet or more.</li> <li>• Night Sky – BMPs to minimize impacts to night sky including light shielding will be employed.</li> </ul>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Applicant-Proposed Measures described in Section 4.19.2 address BMPs to minimize lighting impacts.  Mitigation Measure VIS-1 describes design elements, including structure and color requirements, as well as additional lighting requirements, which will be required to reduce visual impacts. This measure references the requirements of the “ <i>Best Management Practices</i> ” document.		
<b>DFA-RE-1:</b> In order to use the DRECP’s BLM LUPA streamlined process for renewable energy in DFAs and transmission, project proponents must first consult with appropriate representatives of the Department of Defense to ensure the proposed renewable energy and/or transmission activity will not cause an unacceptable	Yes	No	Partial	Yes	No	Partial
		X				

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
<p>risk to national security. Refer to additional detail in LUPA Section IV.4 and Appendix E. Specifically, the following process will be implemented:</p> <ul style="list-style-type: none"> <li>For renewable energy and transmission activities proposed in red areas (see Appendix E), the DRECP BLM LUPA streamlined process will not be available unless a letter is obtained from the Department of Defense Siting Clearinghouse stating that military impacts have been mitigated.</li> <li>For renewable energy and transmission activities proposed in orange or yellow areas (see Appendix E), the DRECP BLM LUPA streamlined process will be not be available until Department of Defense representatives at the regional level have been consulted and have been provided a minimum of 30 days to assess potential mission impacts. If the regional representatives conclude within the 30 day period that there is a significant possibility that a proposed activity presents an unacceptable risk to national security, the BLM will not streamline the proposed activity process and will require additional environmental analysis regarding Department of Defense impacts, unless a letter is obtained from the Department of Defense Siting Clearinghouse stating that military impacts have been mitigated.</li> </ul>	<p>DRECP Appendix E states that the only renewable technologies which present a significant mission compatibility issue with DoD operations in this region are wind and solar power tower.</p>					
<p><b>DFA-BIO-IFS-1:</b> Conduct the following surveys as applicable in the DFAs as shown in Table 21.</p> <ul style="list-style-type: none"> <li>Desert tortoise - Protocol surveys in the desert tortoise habitat areas indicated in Appendix D.</li> <li>Flat-tailed horned lizard - Protocol surveys as specified in the Rangewide Management Strategy (RMS).</li> <li>Bendire’s thrasher - Pre-construction nesting bird survey during breeding season (March 1 through September 30) in suitable habitat on and within 500 feet of construction zone.</li> <li>Burrowing owl - Breeding season surveys (February 1 through August 31) per Burrowing Owl Guidelines (CDFG 2012). Clearance surveys (for direct take avoidance) no less than 14 days prior to ground disturbance per Burrowing Owl Guidelines.</li> <li>Golden eagle - Pre-project golden eagle surveys and pre-construction risk assessment surveys in <b>LUPA-BIO-IFS-28</b>, if applicable as described in golden eagle CMAs below.</li> <li>Swainson’s hawk - Protocol surveys in the Antelope and Owens Valleys.</li> <li>Mohave ground squirrel - Clearance surveys in the Mohave ground squirrel habitat areas indicated in Appendix D. Protocol surveys in key population centers and linkages as identified on the map in Appendix D</li> </ul>	Yes	No	Partial	Yes	No	Partial
			X	X		
	<ul style="list-style-type: none"> <li>Applicable for Desert tortoise, Bendire’s thrasher, Burrowing owl, and Golden eagle.</li> <li>Not applicable for Swainson’s hawk, as Project is not located in Antelope or Owens Valleys.</li> <li>Not applicable for Flat-tailed horned lizard or Mohave ground squirrel, because Project is not within the range of these species.</li> </ul>			<ul style="list-style-type: none"> <li>Desert Tortoise – conforms. Protocol surveys were performed, as discussed in Section 3.4.1.1, even though DRECP Appendix D-17 only requires clearance surveys.</li> <li>Bendire’s thrasher – conforms. Table 3.4-1 lists the species as Low Potential, with nesting habitat present. Mitigation Measure WIL-7 specifies requirements for pre-construction surveys, with dates of March 1 through September 30.</li> <li>Burrowing owl – conforms. Mitigation measure WIL-9 specifies requirements for pre-construction surveys no more than 30 days, and no less than 14 days, in advance.</li> <li>Golden eagle – conforms. Section 3.4.1.1 describes the pre-project golden eagle surveys.</li> </ul>		
<p><b>DFA-BIO-IFS-2:</b> Implement the following setbacks shown below in Table 22 as applicable in the DFAs.</p> <ul style="list-style-type: none"> <li>Bendire’s thrasher - Setback pre-construction, construction, and decommissioning, and other activities</li> </ul>	Yes	No	Partial	Yes	No	Partial
			X	X		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
<p>500 feet from active nests.</p> <ul style="list-style-type: none"> <li>Burrowing owl - 656 feet (200 meters) from active nesting sites.</li> <li>California condor - Setback wind and transmission projects 5 miles from nest sites. Setback solar, geothermal, and other activities than may impact condors 1.5 miles from nest sites and out of direct line of site from nest sites.</li> <li>Gila woodpecker - Setback pre-construction, construction, and decommissioning, and other activities that may impact the species 0.25 mile from suitable habitat during the breeding season (April 1 through July 31).</li> <li>Golden eagle - Setback activities 1 mile from active or alternative nests within an active territory as described in <b>LUPA-BIO-IFS-24</b>.</li> <li>Swainson's hawk - 0.5 mile from active nests.</li> </ul>	<ul style="list-style-type: none"> <li>Applicable for Bendire's thrasher, Burrowing owl, Golden eagle, and Swainson's hawk.</li> <li>Not applicable for California condor or Gila woodpecker, because Project is not within the range of these species.</li> </ul>			<ul style="list-style-type: none"> <li>Bendire's thrasher – conforms. Mitigation measure WIL-7 specifies that the Qualified Biologist shall determine the size of the buffer zone.</li> <li>Burrowing owl – conforms. Mitigation measure WIL-9 specifies a setback of 656 feet from active nests.</li> <li>Golden eagle – conforms. The EIS/EIR reports that surveys identified no nests within 1 mile.</li> <li>Swainson's hawk – conforms. Mitigation measure WIL-7 specifies that the Qualified Biologist shall determine the size of the buffer zone.</li> </ul>		
<p><b>DFA-BIO-IFS-3:</b> Protocol surveys, as described in <b>DFA-BIO-IFS-1</b> and shown in Table 21, are required for development in the desert tortoise survey areas (see Appendix D). Based on the results of the protocol surveys the identified desert tortoises will be translocated, or the activity will be redesigned/relocated as described below:</p> <ul style="list-style-type: none"> <li>If protocol surveys identify 35 or fewer desert tortoises in potential impact areas on an activity site, the USFWS and CDFW (for third party activities) will be contacted and provided with the protocol survey results and information necessary for the translocation of identified desert tortoises. Pre-construction and construction, and other activities will not begin until the clearance surveys for the site have been completed and the desert tortoises have been translocated. Translocation will be conducted in coordination with the USFWS and CDFW, as appropriate, per the protocols in the Desert Tortoise Field Manual (USFWS 2009) and the most up-to-date USFWS protocol.</li> <li>If protocol surveys identify an adult desert tortoise density (i.e., individuals 160 millimeters or more) of more than 5 per square mile or more than 35 individuals total on a project site, the project will be required to be redesigned, re-sited, or relocated to avoid and minimize the impacts of the activity on desert tortoise.</li> </ul>	Yes	No	Partial	Yes	No	Partial
	X			X		
<p><b>DFA-BIO-IFS-4:</b> The DFA in the “North of Edwards” Mohave ground squirrel key population center is closed to renewable energy applications and any activity that is likely to result in the mortality (killing) of a Mohave ground squirrel until Kern and San Bernardino counties complete county General Plan amendments/updates that include renewable energy development and Mohave ground squirrel conservation on nonfederal land in the West Mojave ecoregion and the CDFW releases a final Mohave Ground Squirrel Conservation Strategy, or for a period of 5 years after the signing of the DRECP LUPA ROD, whichever comes first. If Kern and San Bernardino counties and CDFW do not complete their respective plans within the 5-year period, prior to opening the DFA to renewable energy applications and other impacting activities, BLM will assess new Mohave ground squirrel information, in coordination with the CDFW, to determine if modifications to the DFA or CMAs are warranted based on new Mohave ground squirrel information.</p>	Yes	No	Partial	Yes	No	Partial
		X		Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.		
<p><b>DFA-BIO-IFS-5:</b> Once the planning criteria in CMA DFA-BIO-IFS-4, are met, the DFA in the “North of Edwards” Mohave ground squirrel key population center will be reevaluated. If Kern and San Bernardino counties receive Mohave ground squirrel take authorizations from the CDFW through completed Natural Community Conservation Plans or county-wide conservation strategies that address Mohave ground squirrel conservation at a landscape level and include renewable energy development areas on nonfederal land in the West Mojave ecoregion, the “North of Edwards” key population center DFA will be eliminated and the management changed to General Public Lands, as part of adaptive management.</p>	Yes	No	Partial	Yes	No	Partial
		X		Mohave ground squirrel habitat is not present in the Project area, per DRECP Figure D-18.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<p><b>DFA-BIO-PLANT-1:</b> Impact to suitable habitat (see Glossary of Terms) for the following plant Focus Species within the DRECP Plan Area will be capped (see “DFA Suitable Habitat Impacts Cap” in the Glossary of Terms) in the DFAs as described below and in Table 23. The suitable habitat impact cap for these plant species is to be measured in DFAs as a group, not individually.</p> <p>Triple-ribbed milk-vetch is an avoidance species in DFAs, therefore none of its suitable habitat is to be impacted.</p> <ul style="list-style-type: none"> <li>Alkali mariposa lily - 10%</li> <li>Barstow wooly sunflower – 20%</li> <li>Desert cymopterus – 20%</li> <li>Little San Bernardino Mountains linanthus – 20%</li> <li>Mojave monkeyflower – 20%</li> <li>Mojave tarplant – 20%</li> <li>Owens Valley checkerbloom – 20%</li> <li>Parish’s daisy – 20%</li> </ul>	Yes	No	Partial	Yes	No	Partial
		X				
	None of the referenced species are present in the Project area.					
<p><b>DFA-REC-1:</b> 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).</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.14.3.1 evaluates the impact of the Project on the recreation setting, and proposes mitigation to minimize impacts.		
<p><b>DFA-REC-2:</b> 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.</p>	Yes	No	Partial	Yes	No	Partial
		X				
	There are no Level 3 recreation facilities within one-half mile.					
<p><b>DFA-REC-3:</b> SRMAs are exclusion areas for renewable energy development due to the incompatibility with the values of SRMAs. Two exceptions to this management action are:</p> <ol style="list-style-type: none"> <li>geothermal development is an allowable use in the few instances in Imperial County where a geothermal-only DFA overlays the SRMA designation and the lease includes a “no surface occupancy” stipulation, with exception of three specific parcels in the Ocotillo Wells SRMA (the Special Unit Management Plan in Appendix C)</li> <li>the VPL at Antimony Flat in Kern County overlaying the SRMA, renewable energy may be allowed on a case-by-case basis if the proposed project is found to be compatible with the specific SRMA values.</li> </ol>	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not located in a SRMA.					
<p><b>DFA-REC-4:</b> When considering large-scale development in DFAs, retain to the extent possible existing, approved recreation activities.</p>	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 4.14.3.1 evaluates the impact of the Project on recreational use of the site, and proposes mitigation to minimize impacts.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>DFA-REC-5:</b> For displacement of dispersed recreation opportunities, commensurate compensation in the form of enhanced recreation operations, recreation facilities or opportunities will be required. If recreation displacement results in resource damage due to increased use in other areas, mitigate that damage through whatever measures are most appropriate as determined by the Authorized Officer.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Mitigation Measure REC-1 specifies compensation for impacts to dispersed recreation. BLM needs to review and approve that mitigation measure.		
<b>DFA-REC-6:</b> Where activities in DFAs displace authorized facilities, similar new recreation facilities/campgrounds (including but not limited to the installation of new structures including pit toilets, shade structures, picnic tables, installing interpretive panels, etc.), will be provided.	Yes	No	Partial	Yes	No	Partial
		X				
	Project would not displace authorized facilities.					
<b>DFA-REC-7:</b> If designated vehicle routes are directly impacted by activities (includes modification of existing route to accommodate industrial equipment, restricted access or full closure of designated route, pull outs, and staging area's to the public, etc.), mitigation will include the development of alternative routes to allow for continued vehicular access with proper signage, with a similar recreation experience. In addition, mitigation will also include the construction of an "OHV touring route" which circumvents the activity area and allows for interpretive signing materials to be placed at strategic locations along the new touring route, if determined to be appropriate by BLM.	Yes	No	Partial	Yes	No	Partial
	X			X		
				Section 3.14.1.3 discusses how access to nearby recreation areas is to be maintained, Mitigation Measure REC-1 specifies compensation for impacts to dispersed recreation, and Mitigation Measure REC-2 specifies requirements for signage directing users to alternative routes.		
<b>DFA-REC-8:</b> Impacts from activities in a DFA to Special Recreation Permit activities will be mitigated by providing necessary planning and NEPA compliance documentation for Special Recreation Permit replacement activities, as determined appropriate on a case-by case basis.	Yes	No	Partial	Yes	No	Partial
		X				
	There are no known Special Recreation Permit activities that would be affected by the Project.					
<b>DFA-REC-9:</b> If residual impacts to SRMAs occur from activity impacts in a DFA, commensurate mitigation through relocation or replacement of facilities or compensation (in the form of a recreation operations and enhancement fund) will be required.	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not located in a SRMA.					
<b>DFA-REC-10:</b> Within ERMAs, impacts from development projects that do not enhance conservation or recreation goals will require commensurate mitigation through relocation or replacement of facilities.	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not located in an ERMA.					
<b>DFA-LANDS-1:</b> Lands within DFAs are available for disposal.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (land transaction) which is not related to authorization of the Project.					
<b>DFA-LANDS-2:</b> Development of acquired lands within DFAs is allowed, at the discretion of the BLM California State Director, unless development is incompatible with the purposes of the acquisition and any applicable deed restrictions.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project site is not acquired lands.					

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>DFA-LANDS-3:</b> Lands proposed for exchange in DFAs will be segregated from the public land laws for 5 years, but wind, solar, geothermal and transmission applications and their associated facilities are allowed.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (land exchange) which is not related to authorization of the Project.					
<b>DFA-LANDS-4:</b> Review withdrawn lands in DFAs upon receipt of a ROW application and if appropriate modify to allow for issuance of ROW grants.	Yes	No	Partial	Yes	No	Partial
		X				
	The Project area does not involve withdrawn lands.					
<b>DFA-LANDS-5:</b> Cost recovery funding used to process a ROW application may be used to adjudicate and remedy any conflicting land withdrawals, if necessary.	Yes	No	Partial	Yes	No	Partial
		X				
	Project is not known to require any land withdrawals.					
<b>DFA-LANDS-6:</b> Make public lands in DFAs available for selection by the CSLC in lieu of base lands within DFAs. Base lands are School Lands the State of California was entitled to but did not receive title to due to prior existing encumbrances.	Yes	No	Partial	Yes	No	Partial
		X				
	The CMA refers to an internal BLM activity or action (land exchange) which is not related to authorization of the Project.					
<b>DFA-LANDS-7:</b> Transmission facilities are an allowable use and will not require a plan amendment within DFAs.	Yes	No	Partial	Yes	No	Partial
		X				
	Desert Quartzite follows the land use planning decision in the CDCA amended by the NECO plan.					
<b>DFA-VRM-1:</b> Manage all DFAs as VRM Class IV to allow for industrial scale development. Employ best management practices to reduce visual contrast of facilities.	Yes	No	Partial	Yes	No	Partial
		X				
	Desert Quartzite follows the land use planning decision in the CDCA amended by the NECO plan.					
<b>DFA-VRM-2:</b> Regional mitigation for visual impacts is required in DFAs. Mitigation is based on the VRI class and the underlying visual values (scenic quality, sensitivity, and distance zone) for the activity area as it stands at the time the ROD is signed for the DRECP LUPA. Compensatory mitigation may take the form of reclamation of other BLM lands to maintain (neutral) or enhance (beneficial) visual values on VRI Class II and III lands. Other considerations may include acquisition of conservation easements to protect and sustain visual quality within the viewshed of BLM lands. The following mitigation ratios will be applied in DFAs:  <ul style="list-style-type: none"> <li>• VRI Class II 1:1 ratio</li> <li>• VRI Class III ½ (0.5) : 1 ratio</li> <li>• VRI Class IV, no mitigation required</li> </ul> Additional mitigation will be required where activities affect viewsheds of specially designated areas (e.g., National Scenic and Historic Trails).	Yes	No	Partial	Yes	No	Partial
	X				X	
				Section 3.19.1.6 of the EIS/EIR specifies that the project site was designated as VRI Class II at the time of the DRECP ROD. However, no compensatory mitigation is proposed for visual impacts.		

**Table E-1. Evaluation of DRECP CMAs with respect to the Desert Quartzite Solar Project**

CMA	Applicability <sup>1,2</sup>			Conformance <sup>3</sup>		
	Yes	No	Partial	Yes	No	Partial
<b>DFA-WHB-1:</b> Incorporate all guidance provided by the Wild Free-Roaming Horses and Burros Act of 1971, its amendments, associated regulations, and any pertinent court rulings into the project/activity proposal, as appropriate.	Yes	No	Partial	Yes	No	Partial
		X				
	As discussed in Section 4.1.4, the Project area does not support wild horses or burros.					
<b>DFA-WHB-2:</b> Development that would reduce burros' access to forage, water, shelter, or space or impede their wild, free-roaming behavior in Herd Management Area is not allowed.	Yes	No	Partial	Yes	No	Partial
		X				
	As discussed in Section 4.1.4, the Project area does not support wild horses or burros.					
<b>DFA-WHB-3:</b> Mitigation can only occur on lands that the animals were found at the passage of the Wild Free-Roaming Horses and Burros Act of 1971. Expansion of the boundaries of a Herd Management Area back into the Herd Areas would require a land use plan amendment, the cost of which would be incurred by the applicant proposing to develop in the Herd Management Area, if part of the proposed mitigation package.	Yes	No	Partial	Yes	No	Partial
		X				
	As discussed in Section 4.1.4, the Project area does not support wild horses or burros.					
<b>DFA-WC-1:</b> Renewable energy activities are allowed in DFAs that have been inventoried and identified as lands with wilderness characteristics.	Yes	No	Partial	Yes	No	Partial
		X				
	Project site is not located in lands with wilderness characteristics.					
<b>DFA-WC-2:</b> For inventoried lands found to have wilderness characteristics in DFAs, compensatory mitigation is required at a 1:1 ratio if wilderness characteristics are directly impacted. This may be accomplished through acquisition and donation, from willing landowners, to the federal government of (a) wilderness inholdings, (b) wilderness edge holdings that have inventoried wilderness characteristics, or (c) other areas within the LUPA Decision Area that are managed to protect wilderness characteristics. Restoration of impaired wilderness characteristics in Wilderness, Wilderness Study Area, and lands managed to protect wilderness characteristics could be substituted for acquisition.	Yes	No	Partial	Yes	No	Partial
		X				
	Project site is not located in lands with wilderness characteristics.					
<p>1 – The applicability was evaluated by considering:</p> <ul style="list-style-type: none"> <li>• Is the measure applicable to BLM's authorization of a third-party project, or is it specific to BLM-constructed projects or BLM's management policies?</li> <li>• Is the site within the geographic area specified in the CMA?</li> <li>• Are the specific resources addressed by the CMA present at DRECP?</li> <li>• Is the technology subject to the CMA solar PV?</li> <li>• Is the land use classification or designation subject to the CMA present at the site, or likely to be impacted by the project?</li> </ul> <p>2 – The assessment of applicability is unrelated to the question of how the requirements of the DRECP apply to Desert Quartzite, which is a grandfathered project which is exempt from DRECP. The assessment is only a look at the environmental setting and impacts of the project, and an assessment of whether the CMA would apply to the Proposed Action and Alternatives 2 and 3 if the project were being done under DRECP. "Partial" generally means that the CMA has multiple parts, some of which are applicable to the Project, and some of which are not.</p> <p>3 – In almost all cases where conformance is marked "Yes", this determination only means that all of the topics raised in the CMA, and their general goals and objectives, are addressed somewhere in the EIS/EIR. However, in 100% of cases, the language in the EIS/EIR does not exactly match the language in the CMA.</p> <p>4 - Figure 17 in the BRTR shows a feature identified as "Desert Dry Wash woodland (microphyll woodland)". This feature is mapped and discussed in the EIS/EIR as "desert dry wash woodland", but is interpreted to be equivalent to "microphyll woodland" wherever microphyll woodland is specified in a CMA.</p>						