

APPENDIX L
ASSESSMENT OF NECO CMP DESIGNATED OPEN ROUTES (UNPAVED) WITHIN
PROJECT BOUNDARY



An AECOM Company.

October 30, 2015

Mr. Roy Skinner
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San Francisco, California 94105

**RE: DESERT QUARTZITE SOLAR PROJECT
ASSESSMENT OF NECO CMP DESIGNATED OPEN ROUTES (UNPAVED)
WITHIN PROJECT BOUNDARY
URS PURCHASE ORDER NO. 4800019091**

Dear Roy:

1.0 INTRODUCTION

The following assessment identifies the existing Bureau of Land Management (BLM)-designated Northern and Eastern Colorado Desert Coordinated Management Plan (NECO CMP Plan) routes located within the proposed Desert Quartzite Solar Project (Project) solar facility area that would require closure, as well as the original intended uses of the routes. The evaluation identifies the existing alternative Open Routes potentially serving similar uses as the routes proposed for closure. Closure of the Open Routes within the Project boundary is expected to be addressed as part of the overall Plan Amendment to the NECO CMP required for the Project, and would be analyzed in the in-progress Project Environmental Impact Statement/Environmental Impact Report (EIS/EIR).

2.0 NECO CMP DESIGNATED OPEN ROUTES (UNPAVED) WITHIN PROJECT BOUNDARY

The existing BLM-designated routes in the Project Area have been mapped on Figure 1, which shows that the Project solar facility site contains several NECO Plan designated Open Routes (unpaved). Based on the proposed Project site boundary, the BLM identification number for the routes requiring closure and respective locations of the routes are provided in Table 1, below. A detailed view of the NECO CMP route locations showing respective Township, Range, and Section designations is provided on Figure 2.

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**TABLE 1
 NECO CMP DESIGNATED OPEN ROUTES (ALL UNPAVED)
 WITHIN DESERT QUARTZITE PROJECT BOUNDARY¹**

BLM Route Number	Location within Project Boundaries		Usage ²
	Location Description	Township, Range, Section	
660862	Northeast project site area; north-south road (Haig Drive)	T07S, R21E, NE1/4 of Sec. 11	Access to 160-acre privately-owned parcel
660863	Northeast project site area; begins at Seeley Avenue and trends southwest	T07S, R21E, NE1/4 of Sec. 11, W1/2 of Sec. 14, W1/2 of Sec. 23	Access to Mule Mountains
661092	Traverses southern portion of site trending in southwesterly direction and bifurcates from Open Route 660863	T07S, R21E, W1/2 of Sec. 14, S1/2 of Sec. 15	Access to Mule Mountains
660866	Along 18 th Avenue	T07S, R21E, S1/2 of Sec. 10, SW1/4 of Sec. 11	Access to 160-acre privately-owned parcel
661501	Perimeter of 160-acre private parcel (APN 879-110-001)	T07S, R21E, S1/2 of Sec. 10, N1/2 of Sec. 15	Access to 160-acre privately-owned parcel
661102	Southern portion of site; east-west road with terminus with Open Route 660863	T07S, R21E, S1/2 of Sec. 13, N1/2 of Sec. 15	Access to Mule Mountains

¹ Note that the westernmost extremity of the Project Boundary consists of the Project generation-tie line corridor, which would allow vehicle passage and would not require closure to NECO CMP designated Open Route 660703 (Figure 1).

² Usage is inferred based on geographic context, as shown on Figure 1.

3.0 BLM OPEN ROUTE BACKGROUND

3.1 Open Routes Description

According to the *California Desert Conservation Area Plan 1980, As Amended* (CDCA), an Open Route is described as where “access on route by motorized vehicles is allowed. Special uses with potential for resource damage or significant conflict with other use may require specific authorization.” (page 77)

3.2 Route Objectives

Based on the *NECO CMP/FEIS (July 2002)*, the objectives for motorized-vehicle access/routes of travel designations/recreation are to:

- a) Designate routes of travel consistent with the criteria at 43 CFR 8342.1 (these address regulations governing use of open routes)
- b) Provide for competitive off-highway vehicle events in a manner that protects desert resources

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- c) Establish stopping, parking, and vehicle camping limitations consistently

3.3 Route Designations and Review Process

According to the NECO CMP, decisions affecting vehicle access, such as area designations and specific route limitations, are intended to meet present access needs and protect sensitive resources. Future access needs or protection requirements may necessitate changes in these designations or limitations, or the construction of new routes. Access needs unrelated to mining operations, such as roads to private lands, grazing developments, or communication sites, would be reviewed on an individual basis under the authority outlined in Title V of Federal Land Policy and Management Act (FLPMA) and in accordance with appropriate regulations. Each proposal would be evaluated for environmental effects and subjected to public review and comment. As present access needs become obsolete or as considerable adverse impacts are identified through the monitoring program, area designations or route limitations may be revised. In all instances, new routes for permanent or temporary use would be selected to minimize resource damage and use conflicts consistent with the criteria at 43 CFR 8342.1.

3.4 Designation Changes (43 CFR Subpart 8342)

Under Subpart 8342, Designation of Areas and Trails, §8342.3 Designation Changes states, “The authorized officer shall monitor effects of the use of off-road vehicles. On the basis of information so obtained, and whenever the authorized officer deems it necessary to carry out the objectives of this part, designations may be amended, revised, revoked, or other actions taken pursuant to the regulations in this part.”

4.0 ROUTE CLOSURE EVALUATION AND EXISTING ALTERNATIVE ROUTES

Development of the proposed Project would necessitate closure of open route segments within the Project development footprint. Open routes proposed for closure are shown in Figure 2, and are briefly discussed below.

4.1 Closure of Open Routes Providing Access to 160-acre Private Parcel

Open Routes 661501, 660866, and 660862 are presumed to provide access to the 160-acre privately-owned parcel (APN 879-110-001), as shown on Figure 1. Desert Quartzite, LLC has an option to purchase this property and has incorporated this parcel into the proposed Project design. Since this parcel would comprise part of the Project facility area, the Open Routes originally intended to provide access to this parcel would no longer be required.

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Additionally, closure of the routes would not interfere with travel designations and recreation, and/or the route objectives identified in Section 3.2.

4.2 Existing Routes Providing Access to the Mule Mountains

Three (3) Open Routes (Open Routes 660863, 661092, and 661102) identified in Table 1 are presumed to provide access to the Mule Mountains, and as shown on Figure 1, are located within the proposed Project facility area. These Open Routes would require closure for Project development as shown on Figure 2. However, as shown on Figure 1 and Figure 2, the network of existing NECO CMP designated Open Routes could be used to provide access to the Mule Mountains. These existing alternative options include Open Routes 660868, 660703, 660620, and 660689, and the portion of 660863 outside of the Project boundary. Therefore, closure of the portions of Open Routes 660863, 661092, and 661102 within the Project boundaries would not preclude public use of other existing Open Routes providing access to the Mule Mountains.

As mentioned previously, the closure process for the portion of the NECO CMP designated Open Routes within the Project boundary (listed in Table 1) would be incorporated as part of the Project proposal for Plan Amendment to the NECO CMP, and is anticipated to be addressed as part of the Project environmental review process (i.e., EIS/EIR).

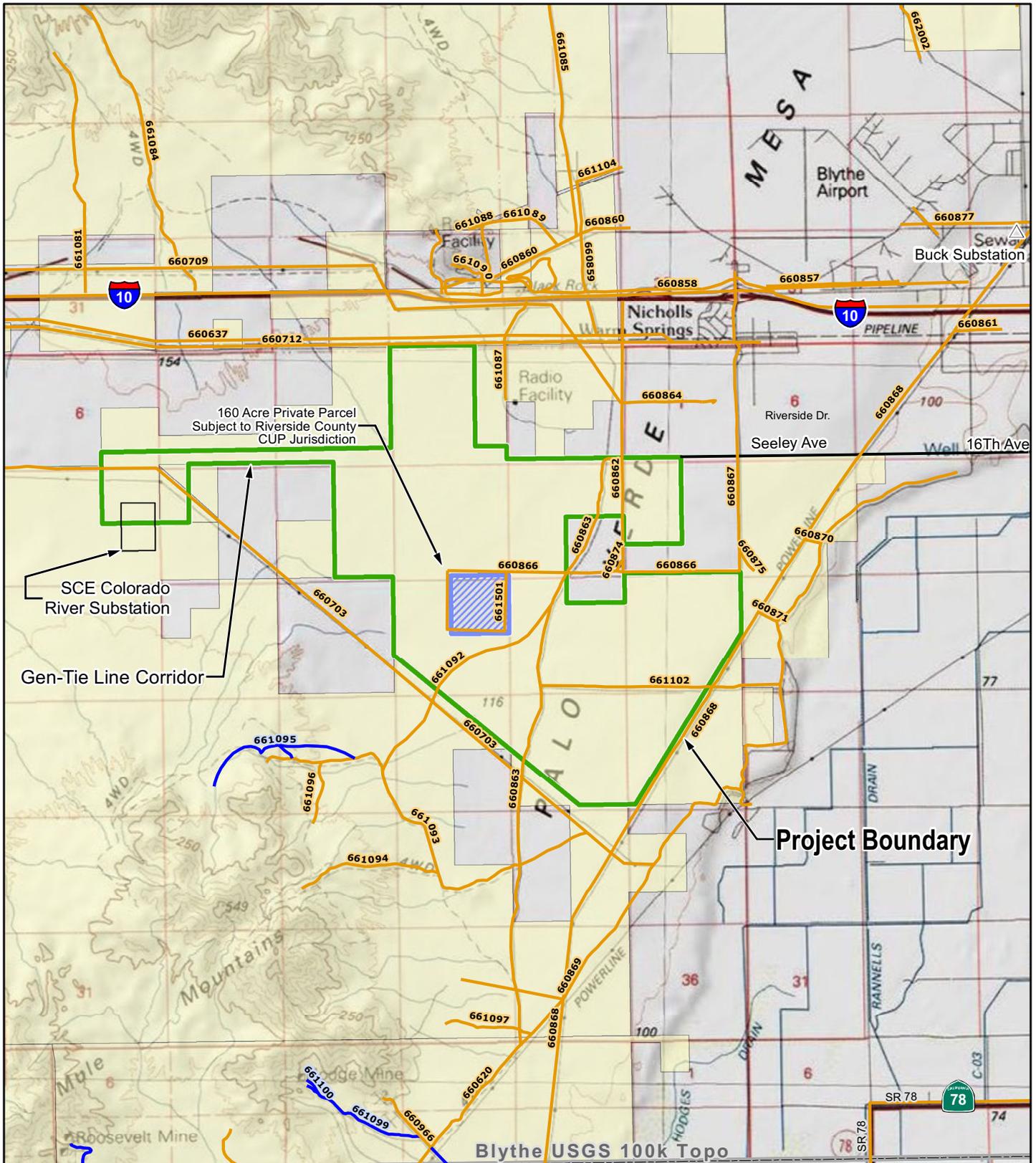
Please let me know if you have any questions or need further assistance.

Sincerely,
URS Corporation



Jennifer Wu
Senior Environmental Scientist

Cc Dave Watkins
Robert Ray



Legend

- Project Boundary
- 160 Acre Private Parcel (APN 879-110-001)
- NECO Plan Route - Open Route
- NECO Plan Route - Closed Route
- BLM Lands

0
1
2 Miles

1:75,000

Desert Quartzite Solar Project

Figure 1
Project Area
NECO Plan Route
Designations

Desert Quartzite, LLC

October 2015

