



DRAFT DESERT RENEWABLE ENERGY CONSERVATION PLAN

EXECUTIVE SUMMARY

September 2014





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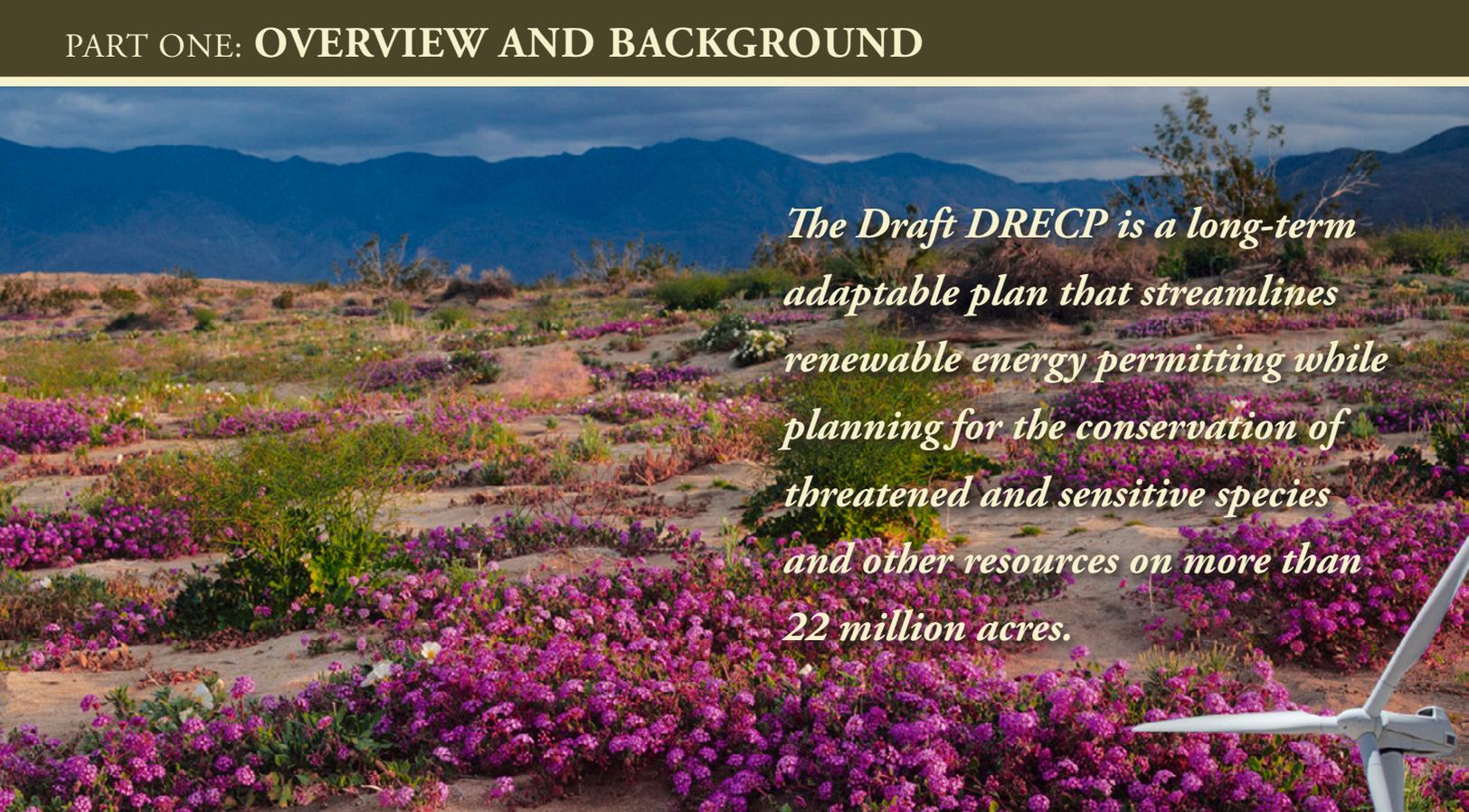
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PART ONE
OVERVIEW AND BACKGROUND





The Draft DRECP is a long-term adaptable plan that streamlines renewable energy permitting while planning for the conservation of threatened and sensitive species and other resources on more than 22 million acres.

1.1 Background and Framework

DESERT RENEWABLE ENERGY CONSERVATION PLAN OVERVIEW

The California Mojave and Colorado/Sonoran desert region is a remarkable place, home to an impressive array of sensitive species and their habitats, a robust cultural heritage, and recreational opportunities for residents and visitors. Yet there is much more—the California desert supports a variety of communities, military installations, and business interests, including agriculture, mining, and tourism. It also has an abundance of some of the best solar, wind, and geothermal resources in the nation. These renewable resources will play a critical role in reducing greenhouse gasses to address climate change and promote energy independence over the next several decades.

Recognizing this multitude of interests, state and federal agencies spent the last 5 years developing the Draft Desert Renewable Energy Conservation Plan (DRECP or Plan). The Draft DRECP is the result of extraordinary collaborative planning between a wide range of stakeholders and government agencies, in-depth scientific analysis, and public input. The agencies leading this planning effort include the California Energy Commission (CEC), California Department of Fish and Wildlife (CDFW), U.S. Bureau of Land Management (BLM), and the U.S. Fish and Wildlife Service (USFWS)—together these agencies comprise the Renewable Energy Action Team (REAT).

The Draft DRECP would create a framework to streamline renewable energy permitting by planning for the long-term conservation of threatened and sensitive species and other resources on more than 22

million acres in Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino, and San Diego counties.

The Draft DRECP is a landscape-scale plan that uses science to inform the siting of renewable energy development projects and the conservation of species, creating systematic habitat protection and connectivity improvements across the Mojave and Colorado/Sonoran desert regions. The Draft DRECP's comprehensive approach is more transparent and predictable and would achieve conservation benefits that could not be achieved using the project-by-project approach currently used to permit renewable energy projects and protect species. The Draft DRECP considers renewable energy facility development in the desert over the next 25 years and, through strategic habitat conservation, provides an ecosystem approach to impact mitigation and landscape-level natural resources conservation.

The DRECP is being prepared by a collaboration of state and federal agencies called the Renewable Energy Action Team, which includes:

- *California Energy Commission*
- *California Department of Fish and Wildlife*
- *U.S. Bureau of Land Management*
- *U.S. Fish and Wildlife Service*

DRECP conservation measures will be monitored to evaluate their effectiveness and, through adaptive management, to make any needed revisions. As proposed, the Draft DRECP will:

1. Help California and the nation meet renewable energy and greenhouse gas emission reduction goals.
2. Identify suitable areas within which the siting of renewable energy projects would be compatible with the conservation of species and habitat.
3. Identify suitable areas for biological conservation, management, and enhancement.
4. Develop a comprehensive conservation and mitigation framework to conserve and manage sensitive plant and wildlife species, natural communities, and other resources.
5. Provide a framework for coordinated state and federal environmental review and permitting activities for renewable energy and transmission projects.
6. On BLM-administered land, address other important resource values, such as cultural, recreation, visual, scientific, and wilderness characteristics.

HISTORY OF DRECP PLANNING AND PUBLIC OUTREACH

The DRECP planning process began in late 2008, building from California's earlier experience with the Renewable Energy Transmission Initiative, which for the first time incorporated land-use planning into the statewide planning process for electric transmission facilities.

On November 17, 2008, Governor's Executive Order S-14-08, directed the CEC and the California Department of Fish and Game (now the California Department of Fish and Wildlife) to develop a Desert Renewable Energy Conservation Plan.

In early 2009, the Department of Interior issued Secretarial Order 3285. As part of the order, federal agencies were encouraged to work with states, tribes, local governments, and other stakeholders to identify appropriate areas for renewable generation and transmission, and to develop best practices to ensure environmentally responsible development of these resources on public lands.

In March 2009, the REAT agencies kicked off the DRECP with a series of public meetings to discuss ideas for facilitating renewable energy development while planning for natural resource conservation in the Plan Area. This Draft Plan reflects input gathered during more than 40 meetings involving agencies, tribes, scientists, and the public since 2010.

Thereafter, the REAT agencies established a Stakeholder Advisory Committee and Independent Science Advisory panel. From 2010 to 2013, this partnership of agencies, stakeholders, and scientists held public meetings to develop the baseline and scientific information necessary to create the Draft DRECP presented in this document. Additional opportunities for public participation and comment will occur over the next several months.

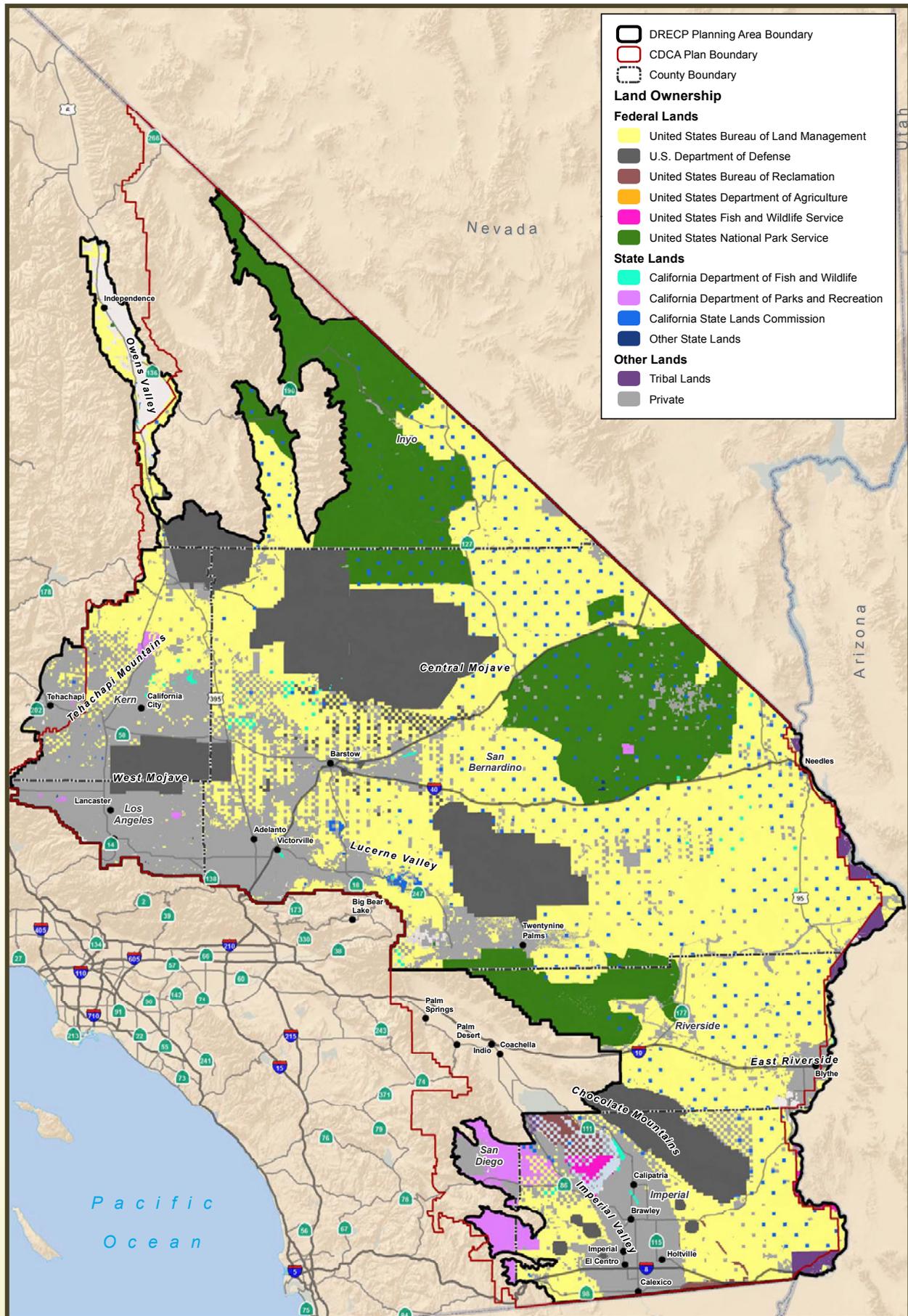
The Plan Area for the DRECP encompasses the Mojave Desert and Colorado/Sonoran Desert ecoregion subareas in California and includes all or a portion of the following counties: Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino, and San Diego. The Plan Area covers approximately 22,585,000 acres. Table 1 summarizes federal and nonfederal acreage within the Plan Area. Certain lands such as military, tribal, urban, and open off-highway vehicle areas are included within the Plan Area but are not considered for renewable energy development or conservation in the DRECP planning process and so are termed Other Lands in the DRECP.

Table 1. Plan Area Nonfederal and Federal Acreage

County	Nonfederal	Federal	Total Acres
Imperial County	1,071,000	1,704,000	2,775,000
Inyo County	320,000	2,668,000	2,987,000
Kern County	925,000	821,000	1,746,000
Los Angeles County	625,000	55,000	680,000
Riverside County	301,000	1,846,000	2,147,000
San Bernardino County	2,075,000	9,907,000	11,982,000
San Diego County	267,000	200	268,000
Grand Total			22,585,000

Note: The following general rounding rules were applied to calculated values: values greater than 1,000 were rounded to nearest 1,000; values less than 1,000 and greater than 100 were rounded to the nearest 100; values of 100 or less were rounded to the nearest 10, and therefore totals may not sum due to rounding. In cases where subtotals are provided, the subtotals and the totals are individually rounded. The totals are not a sum of the rounded subtotals; therefore the subtotals may not sum to the total within the table.

Figure 1. Plan Area



COMPONENTS OF THE DRECP

The DRECP consists of three major planning components (also see Exhibit 1):

- A federal BLM **Land Use Plan Amendment (LUPA)** covering nearly 10 million acres of BLM-administered lands. The LUPA is a set of decisions that establishes management direction for BLM-administered land through amendment to existing land use plans.
- A **General Conservation Plan (GCP)** covering nearly 5.5 million acres of nonfederal lands. The GCP provides a programmatic framework for streamlining the incidental take permitting process under the Endangered Species Act for renewable energy and transmission on nonfederal lands. The DRECP includes incidental take permit applications from the CEC and California State Lands Commission (CSLC).
- A **Conceptual Plan-Wide Natural Community Conservation Plan (NCCP)** that encompasses the entire DRECP Plan Area includes a Conceptual Plan-Wide NCCP Reserve Design and describes a regional strategy for the protection of plants, animals, and their habitats. The NCCP also addresses renewable energy and transmission Covered Activities and, through a focused NCCP Reserve Design and other conservation actions, provides for the conservation and management of Covered Species at a scale commensurate with the scale of the impacts that will result from Covered Activities.

To implement the DRECP as proposed, the BLM must determine whether to approve the LUPA; the USFWS must determine whether to approve the GCP; and CDFW must determine whether to approve the NCCP. The CEC has a different implementation role. The CEC is responsible for permitting large-scale, thermal power plants, including thermal renewable projects, proposed on both BLM-administered and privately-owned lands in the Plan Area and will use the DRECP to streamline permitting of thermal renewable energy projects and appurtenant facilities.

After the DRECP is finalized, a local government could elect to prepare its own NCCP and/or apply directly for incidental take under the GCP. The local government would have flexibility to prepare a plan that covers not just renewable energy projects, but also other private development and public infrastructure projects. The local government would also have flexibility to define appropriate development areas for renewable energy projects and appropriate conservation areas for species covered by the DRECP, provided the local government's plan is consistent with the DRECP's Biological Goals and Objectives and mitigation requirements (i.e., that it tiers from the DRECP).

Instead of or in addition to participating directly in the implementation of the DRECP, local governments could choose

to use the DRECP for other purposes, such as developing land use plans or policies, developing local requirements for renewable energy projects, identifying conservation priorities, identifying sensitive habitat areas, or identifying appropriate mitigation areas for the impacts of locally approved projects.

The BLM is committed to coordinating with local governments throughout its LUPA process. Once the Record Of Decision for the LUPA has been signed, the BLM will continue to partner with interested local governments in the implementation of the LUPA.

The DRECP also includes an environmental analysis of the Plan's potential impacts to support the agencies' decisions. The Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) meets the requirements of the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA).

The BLM Land Use Planning process ensures a balance among the variety of uses and resource protections for America's public lands. Through collaboration with local, state, and tribal governments and the public, the BLM produces land use plans - often called Resource Management Plans - that guide decisions for every action and approved use on the National System of Public Lands. BLM land use plans address everything from energy development and rights-of-way that support communications and energy delivery to recreational uses, cultural resource protection, and crucial species habitat.

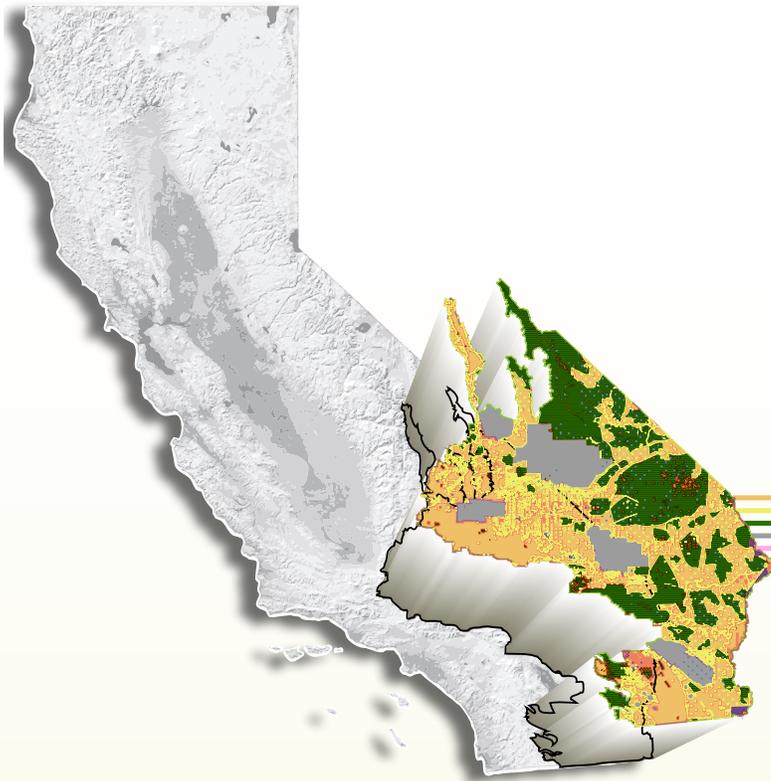
The General Conservation Plan (GCP) policy was developed by the USFWS to streamline processes associated with developing Habitat Conservation Plans (HCPs) under section 10 (a)(1)(B) of the federal Endangered Species Act. The GCP allows the USFWS to develop a conservation plan suitable for the needs of a local area, complete all NEPA requirements for incidental take permit (ITP) issuance, and then issue individual permits to landowners or entities wishing to apply for an ITP and demonstrate compliance with the terms and conditions of the GCP.

The Natural Community Conservation Plan (NCCP) is a program by the State of California that takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. An NCCP identifies and provides for the regional or areawide protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity.

Exhibit 1.

Components of the DRECP

Implementation of the DRECP will involve the Renewable Energy Action Team (REAT) agencies (BLM, CDFW, CEC, USFWS) and other existing and potential partners (CSLC, California Public Utilities Commission, counties, private applicants). Various actions will need to be taken by the REAT agencies and other partners with regard to Covered Activities, some involving overlapping geographic areas and jurisdictions. As described in detail in Volumes I and II, actions addressed in the DRECP include the following: BLM Land Use Amendment (LUPA), CDFW Natural Community Conservation Plan (NCCP), and USFWS General Conservation Plan (GCP), including CEC and CSLC permit applications. This chart geographically depicts the relationships among these actions. For a depiction of the geographic boundaries of the individual actions, please see the individual maps indicated at right.



Maps on this chart schematically portray the relationships among the DRECP assembly components and are not intended to depict in detail ownerships or overlaps among DRECP assembly components. Refer to detailed maps and tables in the body of the document for more specific information.

LLPA Lands

Legislatively & Legally Protected Areas
Total Acreage: 7,567,000

The DRECP does not directly affect the existing management activities of LLPA lands.

LUPA Lands

Land Use Plan Amendment
Agency: Bureau of Land Management (BLM)
Total Acreage: 9,834,000

NCCP Lands

Natural Communities Conservation Plan
Agency: California Dept. of Fish & Wildlife (CDFW)
Total Acreage: 18,986,000

GCP Lands

General Conservation Plan
Agency: US Fish & Wildlife Service (USFWS)
Total Acreage: 5,420,000

Other Lands

Military

Agency: US Department of Defense (DOD)
Total Acreage: 3,019,000

The DRECP does not directly affect the existing management activities of military lands.

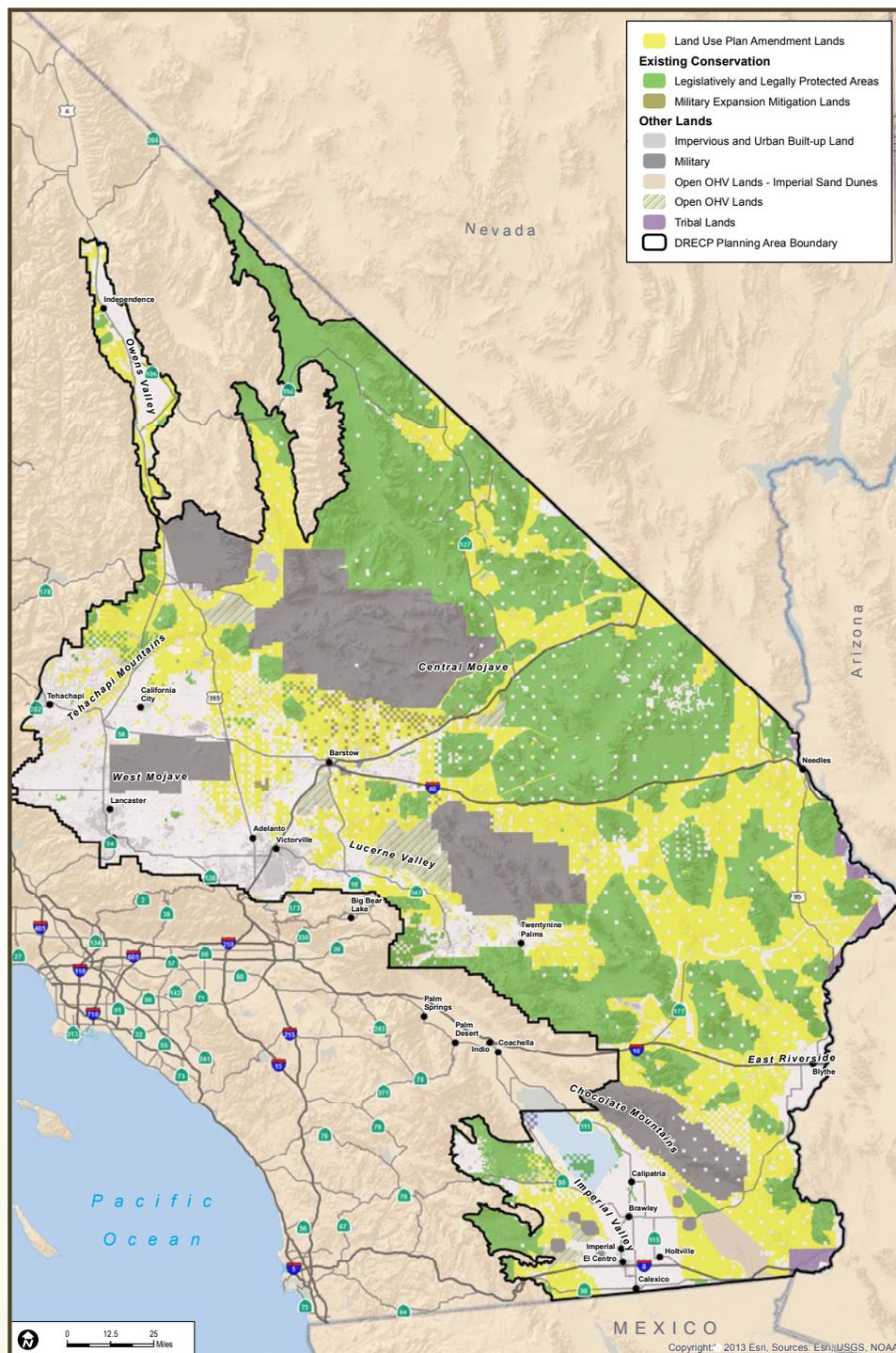
BLM Land Use Plan Amendment

The BLM LUPA would amend the BLM's existing land use plans within the Plan Area – the California Desert Conservation Area Plan, and the Caliente and Bishop Resource Management Plans – to create Development Focus Areas, conservation designations, Special Recreation Management Areas, and make other land allocations.

BLM's objectives for the DRECP and EIR/EIS include:

- Conserve biological, physical, cultural, social, and scenic resources.
- Promote renewable energy and transmission development, consistent with federal renewable energy and transmission goals and policies, in consideration of state renewable energy and greenhouse gas reduction targets.
- Comply with all applicable federal laws, including BLM's obligation to manage the public lands consistent with the Federal Land Policy and Management Act's multiple-use¹ and sustained yield² principles, unless otherwise specified by law.
- "Preserve the unique and irreplaceable resources, including archaeological values, and conserve the use of the economic resources" of the California Desert Conservation Area (43 U.S.C. 1781 [Federal Land Policy and Management Act 601, subd. (a)(6)]).
- Identify and incorporate public lands managed for conservation purposes within the California Desert Conservation Area as components of the National Landscape Conservation System, consistent with the Omnibus Public Land Management Act of 2009 (PL 111-11).
- Amend existing land use plans consistent with the criteria in the Federal Land Policy and Management Act.
- Coordinate planning and management activities with other federal, state, local, and tribal planning and management programs by

Figure 2. Land Use Plan Amendment Lands



considering the policies of approved land resource management programs, to the extent consistent with federal law.

- Make land use allocation decisions outside the Plan Area but within the California Desert Conservation Area, including Visual Resource Management Classes, land use allocations to replace multiple-use classes, and National Conservation Lands designations.

¹ "The term 'multiple use' means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic [CONT'D page 12]

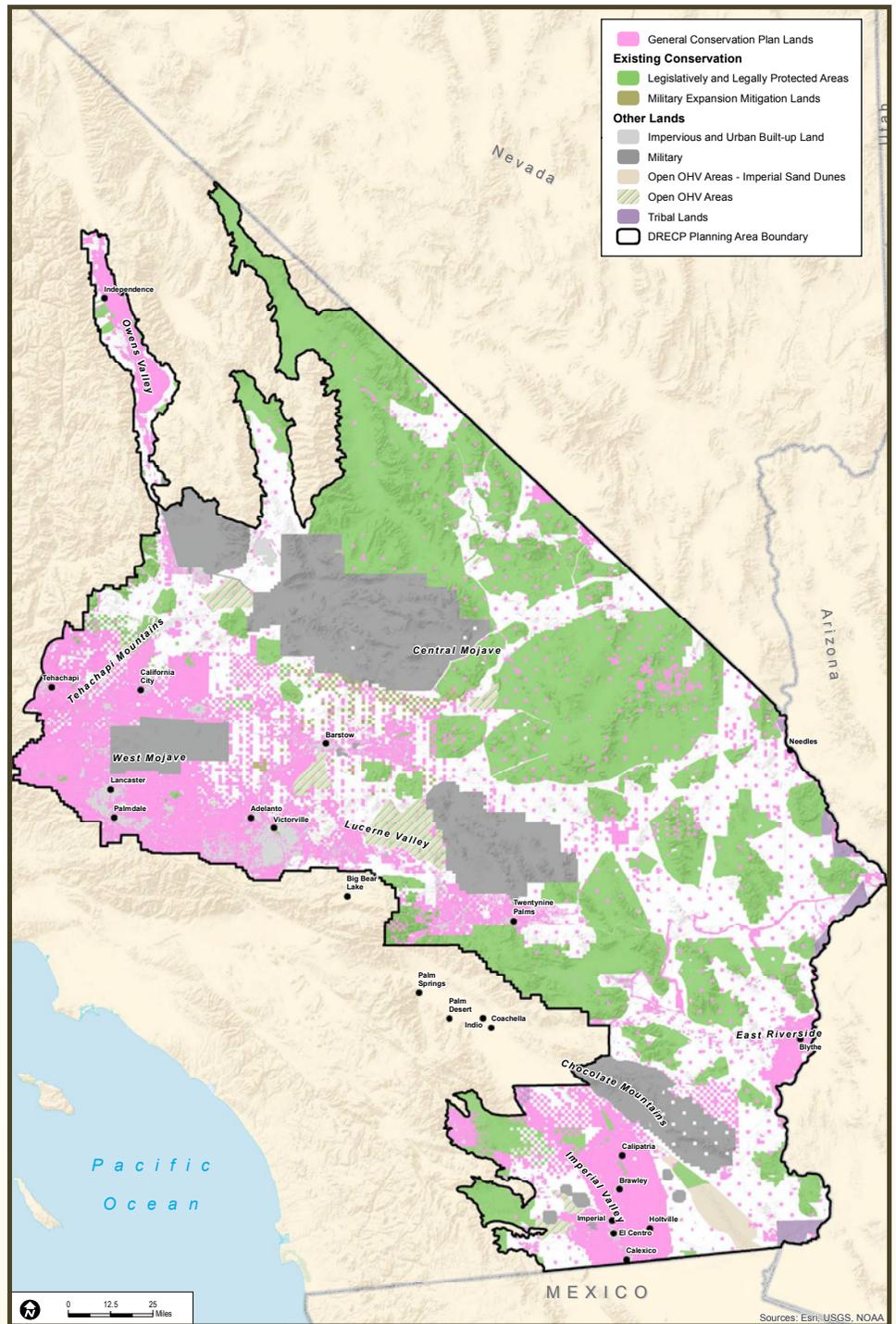
General Conservation Plan

A GCP is a type of programmatic Habitat Conservation Plan, and is required to meet all issuance criteria for an Incidental Take Permit under Section 10(a)(1)(b) of the federal Endangered Species Act. The proposed GCP Permit Area includes all nonfederal lands in the DRECP, including both proposed Development Focus Areas and proposed Conservation Planning Areas. Conservation Planning Areas are mapped areas of nonfederal land depicting the portion of the DRECP Plan-Wide Reserve Design Envelope within which habitat will be protected by acquiring land or conservation easements from willing sellers; Conservation Planning Areas are where actions on nonfederal land to provide compensatory mitigation for renewable energy and transmission projects will be focused. A larger GCP Plan Area includes Interagency Plan-Wide Conservation Priority Areas, which includes BLM-administered lands where permittee habitat enhancement and restoration actions may be implemented.

USFWS objectives are to:

- Develop a GCP that is consistent with Section 10(a)(1)(B) of the federal Endangered Species Act and provides the framework for a streamlined permitting process for renewable energy development by nonfederal project proponents in Development Focus Areas in the Plan Area.
- Base the GCP on the DRECP's comprehensive conservation strategy for 37 proposed Covered Species, including Biological Goals and Objectives, Conservation and Management Actions, the Interagency Plan-Wide Reserve Design Envelope, and the Interagency Plan-Wide Conservation Priority Areas.
- Structure the GCP such that any permits issued under the GCP "umbrella" would authorize incidental take of Covered Species in conjunction with DRECP Covered Activities on nonfederal lands. Applicants may be state agencies, local governments, or individual project proponents.

Figure 3. General Conservation Plan Lands



The USFWS's proposed action under the NEPA in the Draft DRECP and EIR/EIS is to decide whether to approve the GCP, and to issue severable incidental take permits to CEC, CSLC, and other future applicants under the GCP. The Draft EIR/EIS thus incorporates a combined GCP/EIS in one document.

[CONT'D from previous page] use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." (43 U.S.C. 1702 [Federal Land Policy and Management Act 103, subd. (c)].)

² "The term 'sustained yield' means the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use." (43 U.S.C. 1702 [Federal Land Policy and Management Act 103, subd. (h)])

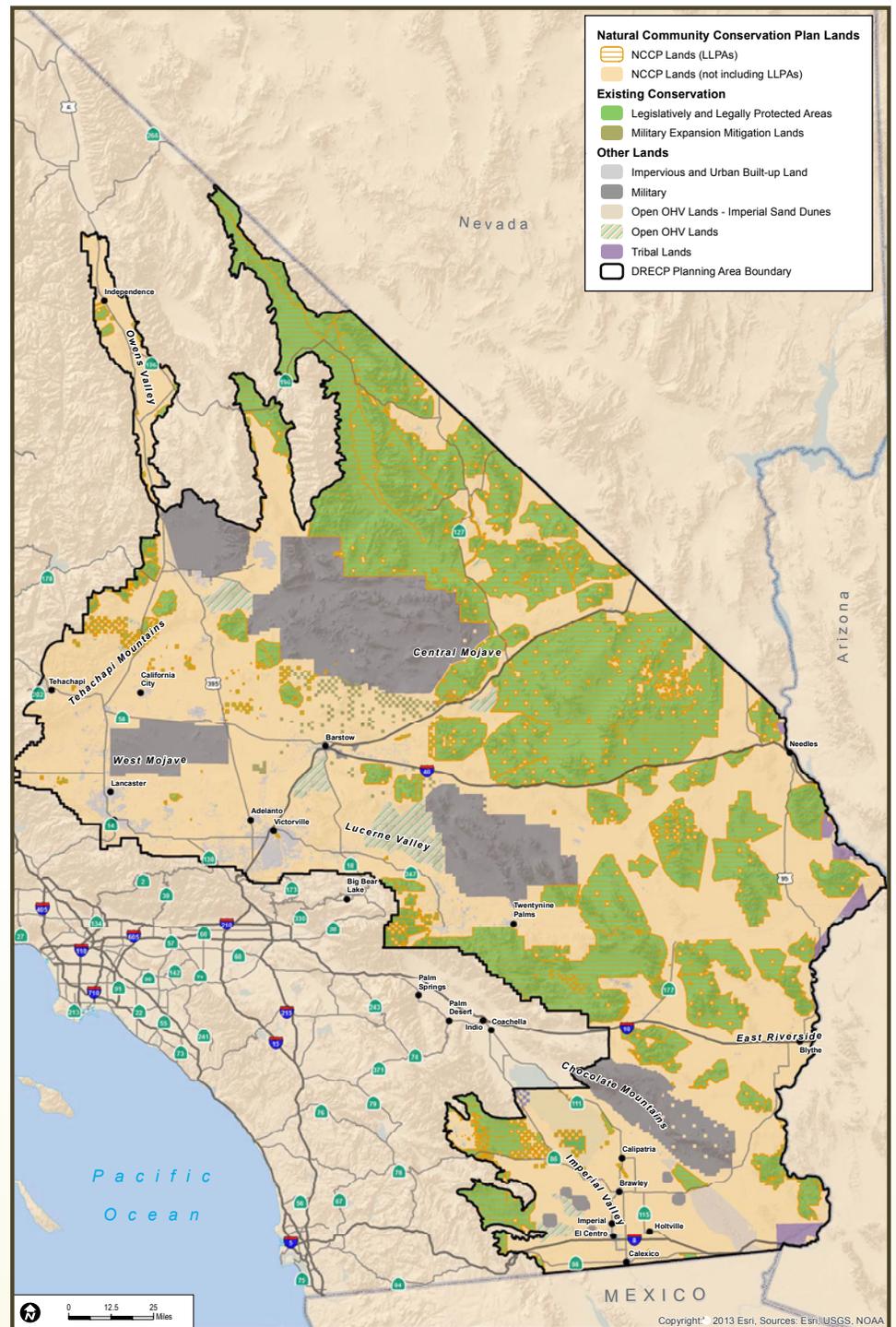
Natural Community Conservation Plan

California Fish and Game Code Section 2835 authorizes CDFW to permit the take of any Covered Species whose conservation and management are provided for in an approved NCCP. The NCCP encompasses the entire Plan Area including the Plan-Wide Reserve Design Envelope, the NCCP Conceptual Plan-Wide Reserve Design, the NCCP Reserve Design, and Development Focus Areas. Approval of the NCCP by the CDFW would allow CDFW to issue take authorizations for Covered Activities for the take of Covered Species, including species listed under the California Endangered Species Act as threatened, endangered, or candidates. The NCCP includes BLM-administered lands in the Plan Area in recognition of the conservation value of such lands for Covered Species and natural communities and for purposes of Natural Community Conservation Planning Act permitting for Covered Activities on BLM-administered lands.

The NCCP has three primary objectives:

- Minimize the effects of future renewable energy development on biological and other environmental resources by designating appropriate areas for utility-scale renewable energy development sufficient to accommodate foreseeable demand for renewable energy in the Plan Area through 2040.
- Contribute to California's Renewables Portfolio Standard and the state's greenhouse gas reduction mandates and goals by planning for approximately 20,000 megawatts of renewable energy generation and associated transmission capacity in the Plan Area by 2040, including issuing state incidental take authorizations with regulatory assurances needed for covered renewable energy and transmission projects.
- Provide for the long-term conservation and management of Covered Species within the Plan Area and preserve, restore, and enhance natural communities and ecosystems in which those species are found by focusing renewable energy development away from areas of greatest biological importance or sensitivity; coordinating and standardizing biological avoidance, minimization,

Figure 4. Natural Community Conservation Plan Lands



mitigation, compensation, conservation, and management requirements for Covered Activities within the Plan Area; and taking other actions to meet conservation planning requirements in state law.

1.2 DRECP Planning Goals

Through the DRECP Planning Agreement and development of the DRECP framework and preliminary conservation strategies, the REAT agencies identified renewable energy, biological, and legal/regulatory planning goals for the DRECP:

RENEWABLE ENERGY GOALS

- Provide a framework for a process by which proposed renewable energy projects within the Plan Area may obtain regulatory authorizations that is more efficient and coordinated, and that results in greater conservation, than a project-by-project, species-by-species review.
- Locate renewable energy development covered by the DRECP on lands with suitable renewable energy resources.
- Locate renewable energy development covered by the DRECP in proximity to existing and planned transmission.
- Identify Development Focus Areas for all DRECP action alternatives within which renewable energy development covered by the DRECP can be sited.
- Identify a common planning goal of 20,000 megawatts by 2040 for all DRECP alternatives, allowing for a range of different renewable energy technologies.
- Build on the Competitive Renewable Energy Zones identified by the Renewable Energy Transmission Initiative.
- Further identify the most appropriate locations within the Plan Area for the development of utility-scale renewable energy projects, taking into account potential impacts to threatened and endangered species and sensitive natural communities.

BIOLOGICAL GOALS

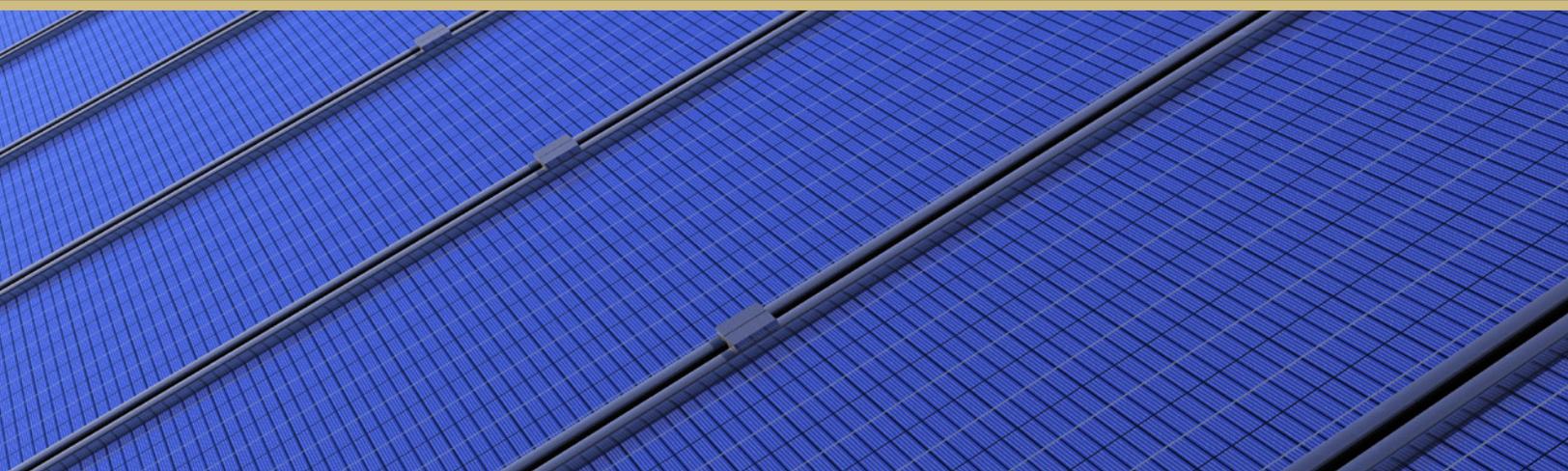
- Locate renewable energy development covered by the DRECP on disturbed lands in areas with low biological conflict, to the extent feasible.
- Identify Plan-Wide Biological Goals and Objectives and apply them to DRECP action alternatives.
- Identify a DRECP Plan-Wide Reserve Design Envelope for each alternative.
- Contribute to the long-term conservation and management of Covered Species and natural communities within the Plan Area.
- Preserve, restore, and enhance natural communities and ecosystems including those that support Covered Species within the Plan Area.
- Identify and incorporate climate change adaptation research and management objectives, and/or policies.

LEGAL/REGULATORY GOALS

- As part of the BLM land use planning process, identify biological and nonbiological resource values for consideration in BLM LUPA alternatives.
- Ensure that the LUPA complies with the Federal Land Policy and Management Act of 1976.
- Ensure that the GCP complies with the Endangered Species Act and the Bald and Golden Eagle Protection Act.
- Ensure that the NCCP complies with the Natural Community Conservation Planning Act.
- Provide a means to implement Covered Activities in a manner that complies with the Natural Community Conservation Planning Act, federal and state Endangered Species Acts, Bald and Golden Eagle Protection Act, NEPA, CEQA, and other relevant laws.
- Provide a basis for the issuance of take authorizations and exemptions allowing the lawful take of Covered Species incidental to Covered Activities.
- Provide a comprehensive means to coordinate and standardize mitigation and compensation requirements for Covered Activities within the Plan Area.



PART TWO
DRECP DEVELOPMENT



To meet the goals established for the DRECP, the DRECP planning process combines renewable energy planning, conservation planning, and a BLM land use planning element. The following sections summarize the energy planning process, the DRECP conservation strategy, and other key elements of the plan.

2.1 Energy—Planning for 20,000 Megawatts

The California desert is home to some of the nation’s highest solar insolation values, areas with reliably strong winds for wind power installations, and untapped geothermal generating potential. These factors, along with the proximity to the state’s largest electricity-consuming centers in Southern California and state and federal renewable energy and climate change policies, add to the likelihood that over the next several decades large renewable energy projects will develop in the region. This development is expected to occur whether the DRECP is established or not.

However, implementing the DRECP will direct future renewable energy development into areas where environmental impacts are expected to be less severe and where transmission access can be more easily provided. This will have the effect of conserving sensitive desert species and ecosystems while reducing permitting uncertainties.

In deciding how much renewable energy to plan for, the REAT agencies needed to consider how much renewable energy development might occur in the desert region. The CEC developed a “renewable energy acreage calculator” for this purpose. The calculator was used to develop scenarios illustrating how much renewable energy capacity might be needed to meet the state’s long-term greenhouse gas reduction policies and climate change and renewable energy mandates and how much of this need for renewable energy might be met through development in the Plan Area. The calculator’s ultimate revised July 2012 scenario estimates that between 17,163 MW and 19,491 MWs of renewable energy capacity would need to be built in the Plan Area by 2040.

These estimates helped to inform the agencies planning assumptions. Acknowledging that any prediction of the profile of the electricity sector decades from now is highly speculative, and that there will be time to correct course between now and 2050 if necessary, the agencies decided to focus on meeting the foreseeable demand for renewable energy through 2040.

The agencies also wanted to provide flexibility and viability over the 25-year term of the plan, and allow for a margin of error in case assumptions used in the calculator proved to underestimate the need for desert renewable facilities. If energy and economic variables, governmental requirements, and other factors translate into a need for more or less development, the DRECP will still achieve its intended purposes of reducing project impacts and conserving sensitive species and habitats. However, the consequences of underestimating the need for renewable energy in the Plan Area may be greater than the consequences of overestimating the need.

If the DRECP plans for less renewable energy development than is

ultimately needed, developers might seek to build renewable energy projects outside of areas identified for development, at a higher financial and environmental cost than development under the Plan. Increased costs for renewable energy development could in turn jeopardize the state’s ability to meet renewable energy and climate goals. In contrast, if the DRECP plans for more renewable energy development than is needed, then there will simply be less development than predicted. In addition, affording developers more flexibility in acquiring land could lower energy costs.

With these considerations in mind, the agencies decided to plan for roughly 20,000 megawatts of new generation and transmission in the DRECP, about 20% more than predicted by renewable energy calculator scenarios. The agencies then estimated the number of acres needed for solar, wind, and geothermal facilities to generate 20,000 megawatts under different future scenarios.

Each alternative creates Development Focus Areas that would provide enough acreage to accommodate up to the 20,000-megawatt estimate. The alternatives vary in distribution of Development Focus Areas and amount of development flexibility they provide, as well as technology mixes to meet the megawatt target. Some alternatives also include Study Area Lands, which may be available for renewable energy development, but require more analysis.

2.2 Covered Activities List

Covered Activities are renewable energy-related activities, located within Development Focus Areas, and transmission-related activities, within and outside Development Focus Areas, that would be eligible for streamlined review processes. These activities include pre-construction, construction, operation, maintenance, and decommissioning (see Table 2).

Table 2. DRECP Covered Activities

Type	Activity
Pre-construction and construction activities	Geotechnical borings
	Installation of temporary meteorological stations
	Temporary access routes and staging areas for meteorological towers and geotechnical borings
	Site reconnaissance (including species-specific surveys)
	Access roads/spur roads (permanent and temporary)
	Ground-disturbance activities (including grading and clearing vegetation)
	Site preparation (e.g., excavation for foundations)
	Well-field facilities
	Generation facilities

Table 2. DRECP Covered Activities (Cont'd)

Type	Activity
Pre-construction and construction activities (cont'd)	Turbine erection
	Tower construction (220- and 500-kilovolt lines)
	Ancillary buildings and general facilities
	Clearing, staging, parking, construction trailer, and equipment and material storage areas
	Evaporation ponds
	Fencing (temporary and permanent, for both wildlife and security)
	Temporary drainage and erosion control (e.g., diversion channels, retention/detention basins, silt fences, erosion fabrics)
	Permanent drainage: conveyance or semi-natural
	Flood control structures
	Installation of utility services
	Meteorological stations
	Transmission collector lines
	Transmission gen-ties
Operation and maintenance activities	Steam turbine and generation operations (solar thermal including power towers and parabolic trough systems)
	Solar thermal power tower operation (solar flux)
	Cleaning of generation facilities, including solar arrays, mirrors, etc.
	Wind turbine operations
	Dust suppression
	Fire and fuel management
	Integrated pest management, including trapping and regulated use of pesticides
	Cleaning, maintenance, repair, and replacement of access roads and spur road
	Cleaning and maintenance of facilities
	Hazardous materials treatment and disposal
	Night lighting
Solid waste disposal	
Decommissioning	Removal of structures
	Restoration and re-vegetation

Table 3. Proposed Covered Species List

COMMON NAME	SCIENTIFIC NAME	FEDERAL STATUS ¹	STATE STATUS ²
Amphibian/Reptile			
Agassiz's desert tortoise	<i>Gopherus agassizii</i>	FT	ST
Flat-tailed horned lizard	<i>Phrynosoma mcallii</i>	BLM/FS	CSC
Mojave fringe-toed lizard	<i>Uma scoparia</i>	BLM	CSC
Tehachapi slender salamander	<i>Batrachoseps stebbinsi</i>	BLM/FS	ST
Bird			
Bendire's thrasher	<i>Toxostoma bendirei</i>	BCC/BLM	CSC
Burrowing owl	<i>Athene cunicularia</i>	BLM	CSC
California black rail	<i>Laterallus jamaicensis coturniculus</i>	BCC/BLM	ST/FP
California condor	<i>Gymnogyps californianus</i>	FE	SE/FP

2.3 Development Focus Areas and Transmission

The DRECP would create Development Focus Areas where renewable energy would be streamlined for approval. Transmission would be streamlined both within and outside Development Focus Areas. The DRECP would streamline the permitting process in several ways, including:

- Greater certainty of permit requirements.
- Simplified mitigation requirements for projects sited within identified Development Focus Areas.
- A programmatic environmental analysis that may simplify project-specific environmental reviews.
- A quicker process for receiving state and federal endangered species permits on private lands.
- A quicker process for receiving state endangered species permits on public lands.
- Priority processing and economic incentives for projects on BLM lands.

2.4 Conservation Strategy

The DRECP biological conservation strategy is the approach for conserving Covered Species and natural communities, and the landscape processes that support them, within the Plan Area.

The biological conservation planning process included the following steps:

1. ESTABLISH THE CONSERVATION FOCUS

The biological conservation focus includes the species and natural communities that the DRECP is targeting for conservation. Applicants may seek incidental take permits for Covered Species under the Natural Community Conservation Planning Act and the Endangered Species Act. Table 3 is the proposed Covered Species list used in the DRECP, which includes 37 taxa. Table 4 is the list of natural communities considered in this document, which includes 31 natural communities within 9 general community groupings.

Table 3. Proposed Covered Species List (Cont'd)

COMMON NAME	SCIENTIFIC NAME	FEDERAL STATUS ¹	STATE STATUS ²
Gila woodpecker	<i>Melanerpes uropygialis</i>	BLM/BCC	SE
Golden eagle	<i>Aquila chrysaetos</i>	BLM	FP
Greater sandhill crane	<i>Grus canadensis tabida</i>	BLM/FS	ST/FP
Least Bell's vireo	<i>Vireo bellii pusillus</i>	FE/BCC	SE
Mountain plover	<i>Charadrius montanus</i>	BCC/BLM	CSC
Swainson's hawk	<i>Buteo swainsoni</i>	BLM/FS	ST
Tricolored blackbird	<i>Agelaius tricolor</i>	FC/BCC/BLM	CSC
Western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	FC/FS/BCC/BLM	SE
Willow flycatcher (incl. southwestern)	<i>Empidonax traillii</i> (incl. <i>extimus</i>)	Southwestern: FE	SE
Yuma clapper rail	<i>Rallus longirostris yumanensis</i>	FE/BCC	ST/FP
Fish			
Desert pupfish	<i>Cyprinodon macularius</i>	FE	SE
Mohave tui chub	<i>Siphateles (Gila) bicolor mohavensis</i>	FE	SE/FP
Owens pupfish	<i>Cyprinodon radiosus</i>	FE	SE/FP
Owens tui chub	<i>Siphateles (Gila) bicolor snyderi</i>	FE	SE
Mammal			
California leaf-nosed bat	<i>Macrotus californicus</i>	BLM/FS	CSC
Desert bighorn sheep	<i>Ovis canadensis nelsoni</i>	BLM	FP*
Mohave ground squirrel	<i>Xerospermophilus mohavensis</i>	BLM	ST
Pallid bat	<i>Antrozous pallidus</i>	BLM/FS	CSC
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	BLM/FS	CSC/ Candidate
Plant			
Alkali mariposa-lily	<i>Calochortus striatus</i>	BLM	(CRPR 1B.2)
Bakersfield cactus	<i>Opuntia basilaris</i> var. <i>treleasei</i>	FE	SE (CRPR 1B.1)
Barstow woolly sunflower	<i>Eriophyllum mohavense</i>	BLM	(CRPR 1B.2)
Desert cymopterus	<i>Cymopterus deserticola</i>	BLM	(CRPR 1B.2)
Little San Bernardino Mountains linanthus	<i>Linanthus maculatus</i>	BLM	(CRPR 1B.2)
Mojave monkeyflower	<i>Mimulus mohavensis</i>	BLM	(CRPR 1B.2)
Mojave tarplant	<i>Deinandra mohavensis</i>	BLM	SE (CRPR 1B.3)
Owens Valley checkerbloom	<i>Sidalcea covillei</i>	BLM	SE (CRPR 1B.1)
Parish's daisy	<i>Erigeron parishii</i>	FT	(CRPR 1B.1)
Triple-ribbed milk-vetch	<i>Astragalus tricarlinatus</i>	FE	(CRPR 1B.2)

¹ Federal Status—FE: Federally Endangered; FT: Federally Threatened; FC: Federal Candidate Species; FS: Forest Service Sensitive; BLM: Bureau Land Management sensitive; BCC: Bird of Conservation Concern

² State Status—SE: State Endangered; ST: State Threatened; CSC: California Species of Concern; FP: Fully Protected; *: limited hunting; CRPR = California Rare Plant Rank. See <https://www.cnps.org/cnps/rareplants/ranking.php> for an explanation of CRPRs.

Table 4. Natural Communities

General Natural Community	Natural Communities
California Forest and Woodland	Californian Broadleaf Forest and Woodland
	Californian Montane Conifer Forest
Chaparral and Coastal Scrub	Californian Mesic Chaparral
	Californian Pre-Montane Chaparral
	Californian Xeric Chaparral
	Central and South Coastal California Seral Scrub
	Central and South Coastal Californian Coastal Sage Scrub
	Western Mojave and Western Sonoran Desert Borderland Chaparral
Desert Conifer Woodland	Great Basin Pinyon–Juniper Woodland

Table 4. Natural Communities (Cont'd)

General Natural Community	Natural Communities
Desert Outcrop and Badland	North American Warm Desert Bedrock Cliff and Outcrop
Desert Scrub	Arizonaian upland Sonoran Desert scrub–Sonoran Desert scrub
	Intermontane Deep or Well-Drained Soil Scrub–Sonoran Desert Scrub
	Intermontane Seral Shrubland
	Inter-Mountain Dry Shrubland and Grassland
	Intermountain Mountain Big Sagebrush Shrubland and Steppe
	Lower Bajada and Fan Mojavean–Sonoran Desert Scrub
	Mojave and Great Basin Upper Bajada and Toeslope
	Shadescale–Saltbush Cool Semi-Desert Scrub
Southern Great Basin Semi-Desert Grassland	
Dunes	North American Warm Desert Dunes and Sand Flats
Grasslands	California Annual and Perennial Grassland
	California Annual Forb/Grass Vegetation
Riparian	Madrean Warm Semi-Desert Wash Woodland/Scrub
	Mojavean Semi-Desert Wash Scrub
	Sonoran-Coloradan Semi-Desert Wash Woodland/Scrub
	Southwestern North American Riparian Evergreen and Deciduous Woodland
	Southwestern North American Riparian/Wash Scrub
Wetland	Arid West Freshwater Emergent Marsh
	Californian Warm Temperate Marsh/Seep
	North American Warm Desert Alkaline Scrub and Herb Playa and Wet Flat
	Southwestern North American Salt Basin and High Marsh

2. GATHER BASELINE BIOLOGICAL INFORMATION

Baseline biological information came from a wide variety of sources and is summarized in the Draft DRECP (Appendix Q). The DRECP biological database benefits from input from Independent Science Advisors (2010) and Independent Science Panel (2012) recommendations (Appendix E).

3. IDENTIFY BIOLOGICAL GOALS AND OBJECTIVES

Biological goals are broad guiding principles for the biological conservation strategy of the DRECP and are typically qualitative. Biological objectives are biological conservation targets and articulate the desired outcome of implementing the biological conservation strategy of the DRECP.

At the landscape level, the primary Plan-Wide goal is to create a DRECP-wide, connected landscape-scale reserve system consisting of a mosaic of large habitat blocks of constituent natural communities that maintains ecological integrity, ecosystem function, and biological diversity and that allows adaptation to changing conditions (including activities that are not covered by the Plan). The reserve system should include temperature and precipitation gradients, elevation gradients, and a diversity of geological facets to accommodate range contractions and expansions in response to climate change.

At the natural community level, the primary Plan-Wide goal is to

promote biodiversity and ecological function within each natural community, and benefit covered or native species dependent on, or closely associated with, each natural community.

At the species level, the primary Plan-Wide goal is to protect, manage, and contribute to recovery of viable self-sustaining populations of Covered Species throughout the species’ distribution in the Plan Area, including conserving sufficient habitat and resources to allow adaptation to environmental change over time.

4. DEVELOP THE RESERVE DESIGN

The reserve design process identifies important areas for conservation in the Plan Area, outside existing protected areas, to meet the DRECP Plan-Wide Biological Goals and Objectives. Conservation planning principles guided the development of the reserve design, including:

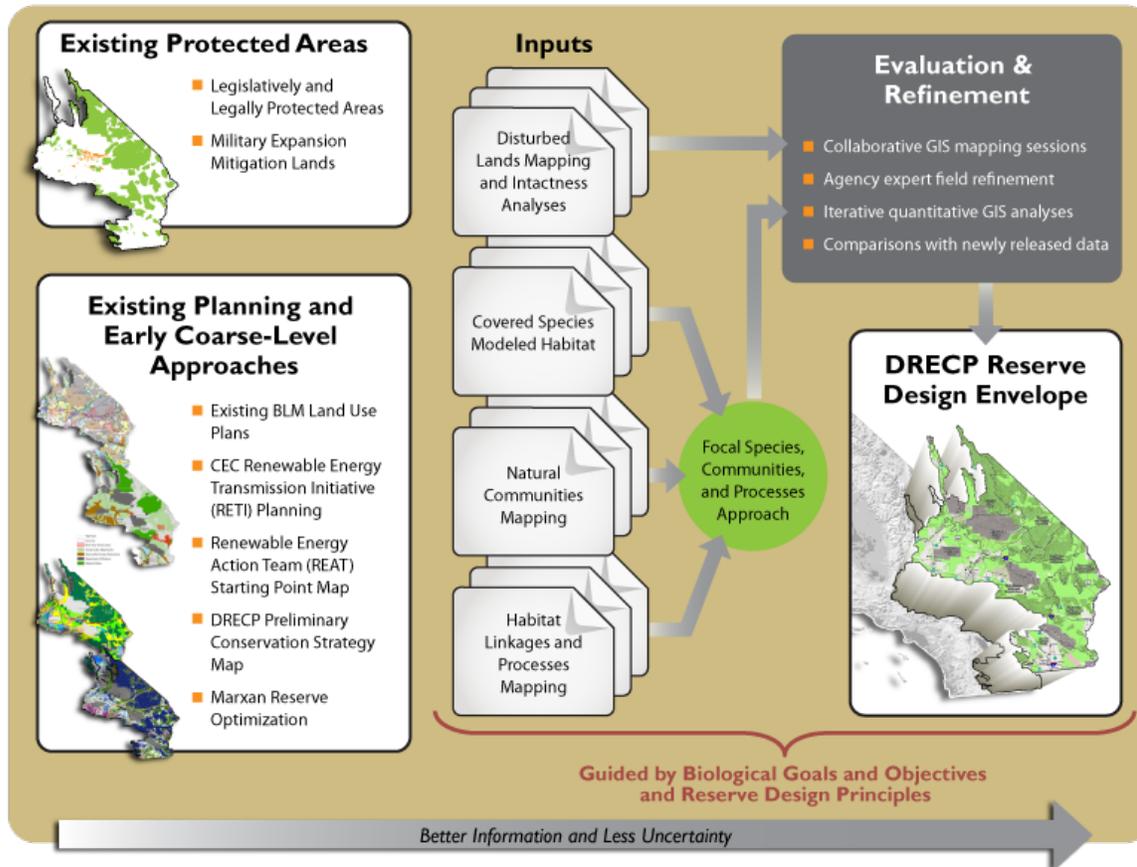
- Maximize conservation area size
- Maintain connectivity
- Minimize edge effects
- Target high-quality, representative examples of all natural communities
- Target areas with limited access
- Buffer urban and rural use impacts

- Preserve irreplaceable and threatened biological resources
- Fully represent environmental gradients
- Consider ecoregions and watersheds
- Consider full ecological diversity within communities
- Contribute to the long-term conservation of all Covered Species
- Consider needs for efficient management

- **Compensation Conservation and Management Actions**, which are compensation requirements that can be met by conserving habitat, implementing eligible non-acquisition compensation actions, or a combination of these measures. Project proponents will be able to fulfill most or all compensation requirements by payment of an implementation fee.

6. DEVELOP MONITORING AND ADAPTIVE MANAGEMENT PROGRAM

Exhibit 2. Reserve Design Process



The Monitoring and Adaptive Management Program is an essential part of the DRECP conservation strategy. The DRECP Monitoring and Adaptive Management Program describes a framework for long-term monitoring of the implementation of DRECP Conservation and Management Actions, including land protection and management actions, monitoring overall implementation of plan objectives, and project-level monitoring. The BLM LUPA, GCP, and NCCP each have monitoring and adaptive management components. The DRECP would establish an Adaptive Management Team, discussed in the implementation section of this Executive Summary (Section 2.5).

5. DEVELOP CONSERVATION AND MANAGEMENT ACTIONS

The biological Conservation and Management Actions (1) avoid and minimize impacts to biological resources resulting from covered renewable energy and transmission projects and (2) contribute to the assembly of the DRECP Conservation Area through actions that compensate for the loss of biological resources and provide for the conservation and management of Covered Species. Conservation and Management Actions include:

- **Avoidance and Minimization Conservation and Management Actions**, which are measures designed to avoid or minimize impacts to Covered Species and natural communities caused by covered renewable energy and transmission projects. They may apply to the entire Plan Area, at the landscape level, or to specific Covered Species or natural communities.

The adaptive management component of the Monitoring and Adaptive Management Program establishes a framework and process designed to continually improve the understanding of managed systems and inform their management over time. The DRECP adaptive management framework is designed to take advantage of ongoing improvements in data collection and analysis and increased scientific information and knowledge, and to provide flexibility to support new ideas. The Monitoring and Adaptive Management Program will allow agencies implementing the DRECP to consider and adapt to a range of environmental changes, including climate change, which could alter the understanding of the management needs for Covered Species, natural communities, and the processes that support them.

7. NONBIOLOGICAL RESOURCES MONITORING AND ADAPTIVE MANAGEMENT PROGRAM

As part of the DRECP, the BLM will implement the LUPA and Conservation and Management Actions for nonbiological resources, in addition to those specified for biological resources. Nonbiological resources to be monitored include land use plan elements, cultural resources, recreation resources, and visual resources.

The BLM will monitor and evaluate management strategies and resource conditions and trends to determine the effectiveness of the LUPA and Conservation and Management Actions and to ensure that implementation is achieving the desired results. Information on resource conditions obtained through monitoring will be used to assess the effectiveness of management strategies and evaluate whether or not management should be adapted to accommodate new information, changes in demands on resources, or other considerations.

2.5 Implementation

DRECP implementation generally covers the following topics:

- Implementation structure
- Integrated project proposal review process
- Review process for projects seeking streamlining under the DRECP
- DRECP Conservation Area assembly
- Information management
- Annual reporting
- Modifications and amendments

Information included in the Draft DRECP regarding the proposed implementation structure, integrated project proposal review process, and review process for projects seeking streamlining under the DRECP is summarized below.

Volume II, Section II.3.1.5 also describes other elements of DRECP implementation including proposed criteria for land acquisition and reserve assembly, information management, annual reporting, and modifications and amendments.

Information management under the DRECP will greatly benefit from the DRECP data portal, which will provide access to the DRECP database for project applicants and the public. The agencies implementing the DRECP will ensure that DRECP data are maintained and updated on a regular basis.

IMPLEMENTATION STRUCTURE

The DRECP sets out the roles, functions, and responsibilities of the various entities that will participate in DRECP implementation (see

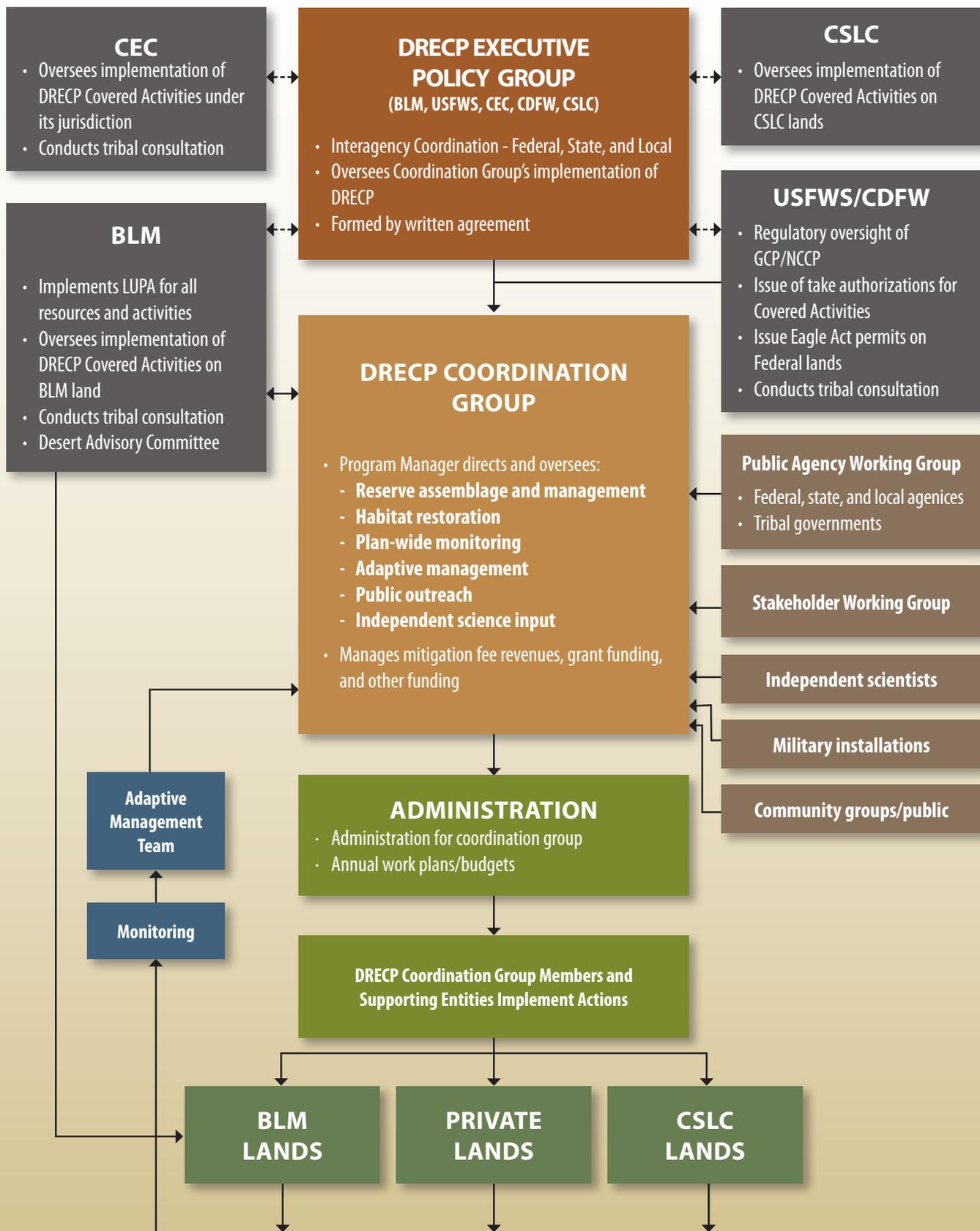
Exhibit 3). The implementation structure will ensure that institutional expertise, capacity, and resources are brought to bear to accomplish the goals and objectives of the DRECP, and that the decision-making process regarding Plan implementation is transparent and understandable.

The implementation structure for the DRECP takes account of each of the various roles and responsibilities that are integral to the successful implementation of a GCP, NCCP, and LUPA and explains which entities will perform them. A DRECP Coordination Group will be formed to oversee implementation of the Plan, including the following roles and responsibilities integral to DRECP implementation:

- Ensuring coordination among participating agencies and entities and facilitating coordinated decision-making
- Program administration, including staffing, facilities, data management, and document management
- Securing and managing funding
- Implementation of conservation actions, including but not limited to
 - Land acquisition
 - Non-acquisition conservation management actions
 - Land stewardship
 - Monitoring and adaptive management
- Determining for each covered project how and/or if the DRECP's programmatic, Plan-Wide avoidance, minimization and mitigation measures are being appropriately applied and implemented
- Compliance monitoring and enforcement
- Facilitating independent science input
- Coordination with federal, state, and local agencies that are not DRECP participants but whose actions could affect or be affected by DRECP implementation
- Tribal coordination and outreach
- Coordination and outreach with the Department of Defense installations in the Plan Area
- Coordination of DRECP actions with complementary non-DRECP actions implemented within and immediately surrounding the Plan Area
- Obtaining stakeholder input
- Public outreach

INTEGRATED PROJECT PROPOSAL REVIEW PROCESS

Exhibit 3. DRECP Implementation Structure



The DRECP is designed to provide a comprehensive conservation and mitigation program for Covered Species and a coordinated permitting framework for state and federal take authorizations for Covered Activities that integrate the requirements of the LUPA, the GCP, and the NCCP. The DRECP conservation and mitigation program and coordinated permitting framework can be integrated with existing federal, state, and local project review and approval and permitting processes. The DRECP does not supplant existing statutory requirements or regulatory permitting processes. For activities proposed on BLM lands, the BLM's regulatory right-of-way grant process will continue to apply; for activities under the CEC's licensing authority, the CEC's licensing process will continue to apply; and for activities proposed on CSLC lands, the CSLC's leasing process will continue to apply. Likewise, for Covered Activities that are within the land use authority or other discretionary authority of local governments or state or federal agencies, existing review and approval processes and requirements will remain in effect. By providing an integrated permitting framework, the DRECP is intended to make the substantive requirements for federal and state take authorizations for Covered Activities consistent and predictable and to make the process for obtaining them more efficient.

To facilitate streamlining under the DRECP, applicants may submit a Project Proposal to the DRECP Coordination Group for an early, informal review for consistency with DRECP requirements. The DRECP Coordination Group will provide an initial assessment regarding the Project Proposal's consistency and, if necessary, identify any revisions or additions needed for consistency with DRECP requirements. The Coordination Group will also work with applicants to ensure they have access to the most current DRECP data resources available.

Upon completion of review by the Coordination Group, the project applicant may use the Project Proposal and results of the Coordination Group evaluation to prepare and submit an application to the agency (or agencies) responsible for issuing the permit or authorization for the proposed Covered Activity. The agency (or agencies) responsible for issuing permits or authorizations for the Covered Activity will have final responsibility for determining whether the Covered Activity meets the requirements for the permit or authorization based on applicable laws and regulations.

A Project Proposal that has completed the Coordination Group review process, and received initial positive assessment regarding consistency with the DRECP, will be eligible for expedited review from DRECP participating agencies, BLM, USFWS, and CDFW as well as CEC and/or CSLC, under their incidental take permits as applicable.

Approval agencies will ordinarily review and take action with regard to submitted applications that are consistent with such Project Proposals within 1 year following the determination by the approval agency that the application is complete. Any additional project-level studies or CEQA/NEPA environmental review would have to be completed

within this 1-year period. Projects initially found to be consistent with the DRECP but requiring technical studies extending for more than 1 year (e.g., 2-year eagle studies) would have an extended review period as needed to complete the study(ies).

REVIEW PROCESS FOR PROJECTS SEEKING STREAMLINING UNDER THE DRECP

Projects initially assessed as consistent with the DRECP during the integrated Project Proposal process and seeking streamlining under the DRECP would be required to comply with DRECP avoidance, minimization, and mitigation requirements as expressed in the DRECP Conservation and Management Actions. DRECP biological and nonbiological Conservation and Management Actions apply during all stages of a project including:

- Pre-siting and design (due diligence)
- Siting and design
- Construction and post-construction
- Operations
- Decommissioning

Biological Conservation and Management Actions are presented in their entirety in Volume II, Section II.3.1.2.5, and nonbiological Conservation and Management Actions are presented in Section II.3.2.3 and Appendix L.

Exhibit 4 provides a road map summarizing the submittal and review process for projects seeking streamlining under the DRECP. The road map is keyed to the project stages noted above and identifies the applicable Conservation and Management Actions during each project stage. Each Conservation and Management Action is given an index number and short name in the exhibit to highlight the particular resource or requirement addressed in the Conservation and Management Action.

The road map references biological Conservation and Management Actions that apply to all projects and nonbiological Conservation and Management Actions applicable to projects on BLM-administered lands. Certain Conservation and Management Actions are standard practices that would apply to all projects while others are resource-specific, linked directly to the presence and distribution of resources on a particular project site.

Exhibit 4. Summary Submittal and Review Process for Projects Seeking Streamlining Under DRECP Including Required Avoidance, Minimization, and Mitigation Requirements

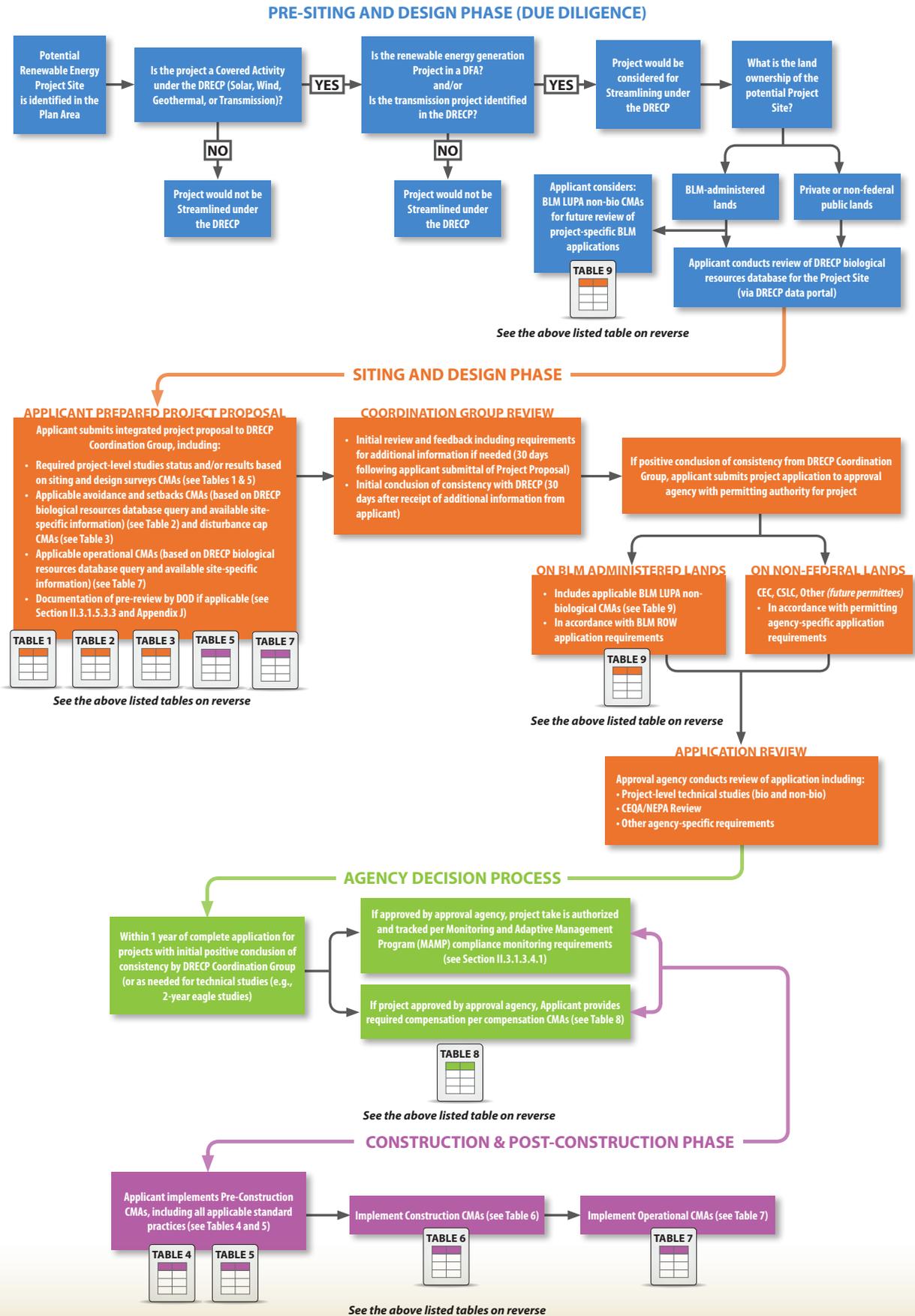


Exhibit 4. Summary Submittal and Review Process for Projects Seeking Streamlining Under DRECP (cont'd)

TABLE 1: Siting and Design Surveys

CMA NUMBER	CMA NAME
AM-PW-1	Survey Requirements and Standards
AM-DFA-DUNE-2	Mojave Fringe-toed Lizard Detailed Sand Mapping
AM-DFA-ONC-1	Other Natural Communities Species Specific Mapping/ Surveying
AM-DFA-AG-1	Agricultural Lands Species Surveys - Swainson's Hawk Protocol Surveys
AM-DFA-PLANT-1	Plant Protocol Surveys
AM-DFA-ICS-1	Individual Covered Species Surveys - Flat-tailed horned lizard
AM-DFA-ICS-37	Mohave Ground Squirrel Protocol Surveys

TABLE 2: Avoidance and Setbacks CMAs

CMA NUMBER	CMA NAME
AM-DFA-RIPWET-1	Riparian and Wetland Avoidance and Setbacks
AM-DFA-RIPWET-3	Riparian and Wetland Bird Setback or Survey
AM-DFA-RIPWET-5	Tricolored Blackbird Seasonal Setback
AM-DFA-RIPWET-6	Fish Setback
AM-DFA-RIPWET-8	Tehachapi Slender Salamander Surveys and Avoidance
AM-DFA-DUNE-1	Dune Avoidance
AM-DFA-AG-2	Agricultural Lands Species Setbacks - Burrowing Owl and Swainson's Hawk
AM-DFA-AG-3	Burrowing Owl Biological Monitoring
AM-DFA-AG-6	Greater Sandhill Crane Avoidance
AM-DFA-BAT-1	Bat Avoidance and Setbacks
AM-DFA-PLANT-2	Plant Avoidance and Setback
AM-DFA-ICS-2	Individual Covered Species Setbacks - Bendire's Thrasher, California Condor, Gila Woodpecker, Golden Eagle
AM-DFA-ICS-5	Desert Tortoise Conservation Areas and Linkages Avoidance
AM-DFA-ICS-26	Golden Eagle Recreational Setback and Closures
AM-DFA-ICS-39	Mohave Ground Squirrel Suitable Habitat Disturbance
AM-DFA-ICS-43	Implementing Entity Requirements - Mohave Ground Squirrel Data Gap Baseline Studies

TABLE 3: Disturbance Cap CMAs

CMA NUMBER	CMA NAME
AM-DFA-PLANT-3	Plant Suitable Habitat Impact Caps - Bakersfield cactus, triple-ribbed milk-vetch, and Alkali Mariposa Lily
AM-DFA-ICS-27	Golden Eagle Habitat Disturbance Cap

TABLE 4: Pre-Construction CMAs

CMA NUMBER	CMA NAME
AM-DFA-DUNE-3	Mojave Fringe-toed Lizard Clearance Surveys
AM-DFA-AG-1	Agricultural Lands Species Surveys - Burrowing Owl Clearance Surveys and Breeding Season Surveys
AM-DFA-AG-4	Burrowing Owl Burrow Exclusion
AM-DFA-AG-5	Burrowing Owl Translocation
AM-DFA-ICS-1	Individual Covered Species Surveys - Desert Tortoise Moderate Requirement Areas, Bendire's Thrasher, Golden Eagle, Mohave Ground Squirrel
AM-DFA-ICS-3	Desert Tortoise Clearance Survey and Translocation
AM-DFA-ICS-11	Desert Tortoise Clearance Survey and Translocation
AM-DFA-ICS-28	Golden Eagle Pre-Project Surveys
AM-DFA-ICS-29	Golden Eagle Pre-Construction Risk Assessment Surveys
AM-DFA-ICS-36	Mohave Ground Squirrel Clearance Surveys
AM-DFA-ICS-28	Golden Eagle Pre-Project Surveys
AM-DFA-ICS-29	Golden Eagle Pre-Construction Risk Assessment Surveys
AM-DFA-ICS-3	Desert Tortoise Clearance Survey and Translocation
AM-DFA-ICS-36	Mohave Ground Squirrel Clearance Surveys

TABLE 5: Siting and Design/Pre-Construction Standard Practices CMAs

CMA NUMBER	CMA NAME
AM-PW-3	Resource Setback Standards
AM-PW-4	Seasonal Restrictions
AM-PW-6	Subsided Predators Standards
AM-PW-7	Restoration of Areas Disturbed by Construction Activities But Not Converted by Long-Term Covered Activities
AM-PW-8	Closure and Decommissioning Standards
AM-PW-9	Standard Practices for Hydrology and Water Resources
AM-PW-10	Standard Practices for Soil Resources
AM-PW-11	Standard Practices for Weed Management
AM-PW-12	Standard Practices for Fire Prevention/Protection
AM-PW-13	Standard Practices for Noise
AM-PW-14	Standard Practices for Siting and Design
AM-PW-15	Standard Practices for Controlling Nuisance Animals and Invasive Species
AM-PW-16	Standard Practices for Caring of Injured Wildlife
AM-PW-17	Other General Standard Practices
AM-LL-1	Linkages and Connectivity
AM-LL-2	Hydrology
AM-LL-3	Aeolian Processes

TABLE 5: Continued

AM-DFA-RIPWET-2	Maintaining Wetland Hydrological Function
AM-DFA-RIPWET-9	Tehachapi Slender Salamander Barriers
AM-DFA-ONC-2	Other Natural Communities Species Preservation or Salvage Actions
AM-DFA-ICS-4	Desert Tortoise Translocation Site Avoidance
AM-DFA-ICS-6	Desert Tortoise Linkage Effects Evaluation
AM-DFA-ICS-7	Desert Tortoise Ord-Rodman TCA
AM-DFA-ICS-8	Desert Tortoise Road Restrictions in Tortoise Conservation Areas and Linkages
AM-DFA-ICS-16	Flat-tailed horned lizard RMS Minimization Measures
AM-DFA-ICS-20	California Condor Guy Wire Bird Deterrents
AM-DFA-ICS-22	California Condor Nest Territory Management Plans
AM-DFA-ICS-30	Golden Eagle Risk Assessment
AM-DFA-ICS-32	Golden Eagle Take Permit Information Submittal
AM-DFA-ICS-34	Desert Bighorn Sheep Water Access - Covered Activities
AM-DFA-ICS-35	Desert Bighorn Sheep Water Access - Transmission
AM-DFA-ICS-38	Mohave Ground Squirrel Impact Minimization in Linkages
AM-DFA-ICS-40	Mohave Ground Squirrel Habitat Growth Configuration
AM-TRANS-1	Undergrounding Electrical Lines
AM-TRANS-2	Flight Diverters
AM-TRANS-3	Avoid Transmission Across Canyons
AM-TRANS-4	Transmission Projects Siting

TABLE 6: Construction CMAs

CMA NUMBER	CMA NAME
AM-PW-2	Biological Monitoring
AM-PW-5	Worker Education
AM-DFA-ICS-9	Desert Tortoise Road Crossings
AM-DFA-ICS-10	Desert Tortoise Exclusion Fencing
AM-DFA-ICS-12	Desert Tortoise Biological Monitoring
AM-DFA-ICS-13	Desert Tortoise Biological Monitoring of Geotechnical Borings
AM-DFA-ICS-14	Desert Tortoise Vehicle Inspection
AM-DFA-ICS-15	Desert Tortoise Speed Limit
AM-DFA-ICS-17	Bendire's Thrasher Biological Monitoring
AM-DFA-ICS-18	California Condor Avoidance and Notification
AM-DFA-ICS-19	California Condor Flight Activity Restriction
AM-DFA-ICS-21	California Condor Materials Storage
AM-DFA-ICS-22	California Condor Ethylene Glycol Restriction
AM-DFA-ICS-31	Golden Eagle Mortality Monitoring

TABLE 7: Operational CMAs

CMA NUMBER	CMA NAME
AM-LL-4	Project-Specific Bird and Bat Operational Actions for Covered Species
AM-DFA-RIPWET-4	Riparian and Wetland Bird Lighting
AM-DFA-RIPWET-7	Fish Operational Recovery Plan Measures
AM-DFA-AG-7	Swainson's Hawk Rodenticides and Insecticides Prohibition
AM-DFA-ICS-14	Desert Tortoise Vehicle Inspection
AM-DFA-ICS-15	Desert Tortoise Speed Limit
AM-DFA-ICS-23	California Condor Detect, Deter, and Curtailment Strategy
AM-DFA-ICS-24	California Condor Operational Prevention
AM-DFA-ICS-25	California Condor Operations Strategy
AM-DFA-ICS-31	Golden Eagle Mortality Monitoring
AM-DFA-ICS-33	Golden Eagle Advanced Conservation Practices
AM-DFA-ICS-41	Mohave Ground Squirrel Avoidance During Operations
AM-DFA-ICS-42	Mohave Ground Squirrel BLM Rodenticides
AM-LL-4	Project-Specific Bird and Bat Covered Species Operational Actions
AM-LL-5	Project-Specific Bird and Bat Non-covered Species Conservation Strategy

TABLE 8: Compensation CMAs

CMA NUMBER	CMA NAME
COMP-1	Compensation Requirements for Siting, Construction, Terrestrial Operational, and Decommissioning Impacts in DFAs
COMP-2	Compensation Requirements for Siting, Construction, Terrestrial Operational, and Decommissioning Impacts for Transmission in the Plan-wide Reserve Design Envelope
COMP-3	Compensation Requirements for Operational Bird and Bat Covered Species Impacts
COMP-4	Golden Eagle Specific Compensation
COMP-5	DRECP-wide Golden Eagle Monitoring

NOTES:

* CMAs = Conservation and Management Actions

** In addition to the biological CMAs that apply to Covered Activities in the DFAs, transmission projects in the reserve would be required to implement the applicable biological CMAs for the reserve shown in Section II.3.1.2.5.5

TABLE 9: Preferred Alternative CMAs for Resources Areas

Air Resources
CMAs for the Entire Planning Area
Comprehensive Trails and Travel Management
CMAs for the Entire Planning Area
CMAs in Development Focus Areas and DRECP Variance Lands, Future Assessment Areas, and Special Analysis Areas
CMAs National Conservation Lands, Areas of Critical Environmental Concern, and Wildlife Allocations
CMAs for Special Recreation Management Areas
Cultural Resources and Tribal Interests
CMAs for the Entire Planning Area
CMAs in Development Focus Areas and DRECP Study Areas, and Transmission Corridors
CMAs for National Conservation Lands and Areas of Critical Environmental Concern
Lands and Realty
CMAs for the Entire Planning Area
Exchanges with the State of California
CMAs in Development Focus Areas and DRECP Study Areas
CMAs in National Conservation Lands
CMAs in Areas of Critical Environmental Concern
CMAs in Wildlife Allocations
CMAs in Special Recreation Management Areas
Livestock Grazing
Standards of Rangeland Health and Guidelines for Grazing Management
CMAs for the Entire Planning Area
Minerals
CMAs for the Entire Planning Area
High Potential Mineral Areas
Existing Mineral/Energy Operations
Existing High Priority Mineral/Energy Operations Exclusion Areas
Access to Existing Operations
Areas Located Outside Identified Mineral Areas
CMAs in National Conservation Lands and Areas of Critical Environmental Concerns
High Potential Mineral Areas
National Scenic & Historic Trails
Conservation and Management Actions
National Recreational Trails
Conservation and Management Actions
Paleontology
CMAs for the Entire Planning Area
Recreation and Visitor Services
CMAs for the Entire Planning Area
CMAs in Development Focus Areas and DRECP Variance Lands, Future Assessment Areas, and Special Analysis Areas
CMAs in National Conservation Lands, Areas of Critical Environmental Concern, and Wildlife Allocations
CMAs in Special Recreation Management Areas
Soil, Water, and Water-Dependent Resources
CMAs Common to the Entire Planning Area
General
Soil Resources
Surface Water
Groundwater Resources
Soil, Water, and Water-Dependent Resources CMAs Restricted to Specific Areas on BLM lands (Devils Hole, Calvada Springs/South Pahump Valley DFA, Death Valley National Park, Joshua Tree National Park or Mojave National Preserve)
CMAs for Development Focus Areas and DRECP Study Areas (for Vegetation only)
Special Vegetation Features
CMAs Common to the Entire Planning Area
Vegetation
CMAs Common to the Entire Planning Area
CMAs for Development Focus Areas and DRECP Study Areas
Visual Resources Management
CMAs Common to the Entire Planning Area
CMAs for Development Focus Areas and DRECP Study Areas
CMAs in Areas of Critical Environmental Concern and Special Recreation Management Areas
Wild Horses and Burros
Conservation and Management Areas for Development Focus Areas and DRECP Variance Lands, Future Assessment Areas, and Special Analysis Areas
Wilderness Characteristics
CMAs Common to the Entire Planning Area
CMAs for those Lands Identified for Management to Protect Wilderness Characteristics
CMAs for Development Focus Areas and Approved Transmission Corridors

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PART THREE
ALTERNATIVE PLAN DESIGNS



The REAT agencies have developed five alternatives, or proposed approaches, for achieving the Plan’s goals. The Preferred Alternative is the plan design that the REAT agencies believe to be the best way of meeting the DRECP’s goals. The DRECP also includes four other action alternatives. Each alternative was developed in response to public input received during the planning process. The DRECP also analyzes the “no action” alternative, or scenario in which agencies make no new decisions and maintain current policies and management.

The various alternatives present different ways of responding to the renewable energy, conservation, and other resource goals of the DRECP. With these different approaches come trade-offs. An alternative that emphasizes previously disturbed lands in Development Focus Areas may have greater potential impacts to farmland and limit renewable energy siting flexibility, while an alternative offering more lands in Development Focus Areas may require more transmission infrastructure and have greater impacts to certain habitats or other resources. After taking public input into consideration, the REAT agencies will decide whether the Preferred Alternative, one of the other alternatives, or some combination thereof best achieves the goals of the DRECP.

3.1 Overview of the Preferred Alternative

Key features of the Preferred Alternative include:

- Geographically dispersed Development Focus Areas on public and private lands with the expected mix of solar, wind and geothermal technologies (note that expected distribution and amount of geothermal technologies are a constant among all action alternatives)
- Range of siting flexibility for renewable energy development
- Opportunities for dispersed solar development in the West Mojave region (Los Angeles, Kern, and San Bernardino counties), Inyo County region, eastern San Bernardino County, and southern Riverside/northern Imperial counties.
- Opportunities for dispersed wind, mostly in West Mojave, Inyo and San Bernardino counties
- Opportunities for geothermal in Imperial Valley (Imperial County) and Owens Valley (Inyo County)
- Potential transmission lines from existing substations in Imperial and Riverside counties
- Lands that could be appropriate for renewable energy but require additional study, including Special Analysis Areas, Future Assessment Areas, and DRECP Variance Lands
- BLM LUPA conservation designation lands generally balanced between Areas of Critical Environmental Concern and National Conservation Lands with somewhat greater emphasis on National Conservation Lands
- National Conservation Lands focus is on habitat connectivity and highly significant cultural and botanical sites
- A Plan-Wide Reserve Design Envelope that addresses the broad range of biological resources and resource values identified in the reserve design process, reflecting a balance of avoidance and compensation
- Interagency Plan-Wide Conservation Priority Areas that identify lands suitable for mitigating impacts to, and providing for the conservation and management of, species
- Predictable costs for biological mitigation.

Study Area Lands

Special Analysis Areas. *An interim category used in certain DRECP alternatives to represent areas subject to ongoing analysis to inform the designation (development or conservation) that is expected to be made for the areas prior to agency decisions on the DRECP.*

Future Assessment Areas. *Designated areas in certain action alternatives that are subject to future assessment for suitability for renewable energy development or conservation designation. The knowledge about the value of these areas for renewable energy development is ambiguous. The current known value of these areas for ecological conservation is moderate to low; therefore, the areas are not allocated to either development or conservation and are assigned to future assessment and decisions.*

Conservation Planning Areas. *In each action alternative, the portion of the DRECP Plan-Wide Reserve Design Envelope that falls outside of existing conservation areas and BLM-administered lands. A portion of the DRECP Conservation Area will be assembled by acquiring land or conservation easements from willing sellers in the Conservation Planning Areas to contribute to meeting the Plan-Wide Biological Goals and Objectives.*

Exhibit 5. Plan-Wide Acres in the Preferred Alternative

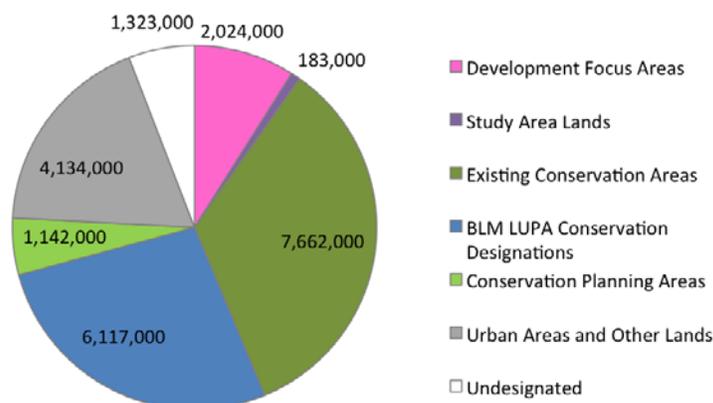
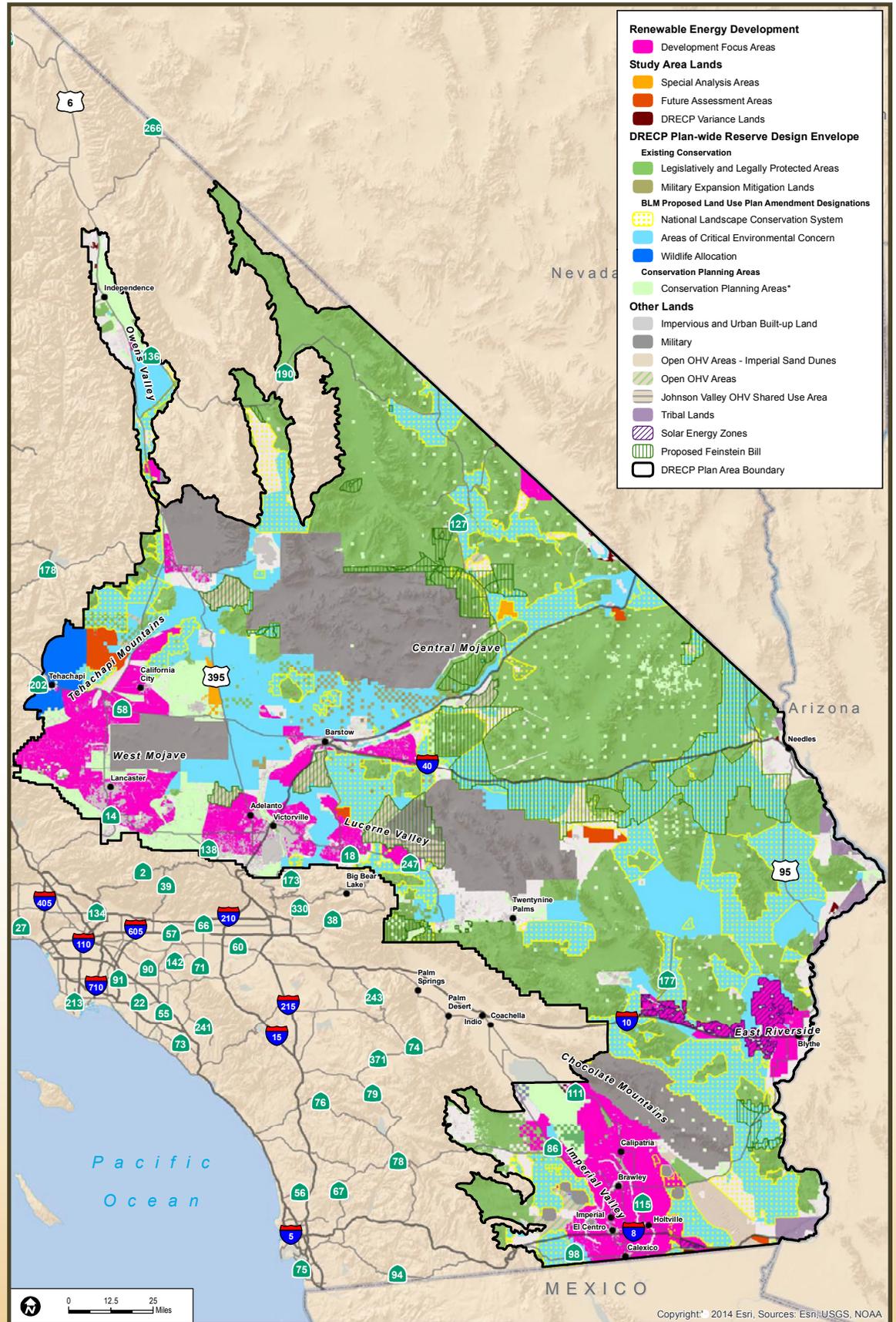


Figure 5. Preferred Alternative

MAP LEGEND DEFINITIONS

NOTE: Legend items defined on this chart represent a compilation of all legend call-outs on the alternatives maps. Not all legend items appear on each individual map.

DEVELOPMENT FOCUS AREAS	
	Development Focus Areas Locations where renewable energy generation and transmission projects are covered and could be streamlined for approval under the DRECP.
STUDY AREA LANDS	
	Special Analysis Areas An interim category used in certain DRECP alternatives to represent areas subject to ongoing analysis to inform the designation (development or conservation) that is expected to be made for the areas prior to agency decisions on the DRECP.
	Future Assessment Areas Designated areas in certain action alternatives that are subject to future assessment for suitability for renewable energy development or conservation designation. The knowledge about the value of these areas for renewable energy development is ambiguous. The current known value of these areas for ecological conservation is moderate to low; therefore, the areas are not allocated to either development or conservation and are assigned to future assessment and decisions.
	DRECP Variance Lands These represent the BLM Solar PEIS Variance Lands as screened for the DRECP based on BLM screening criteria. The lands are potentially available for renewable energy development, but would not benefit from the DRECP streamlined permitting process.
RESERVE DESIGN LANDS	
Existing Conservation	
	Legislatively and Legally Protected Areas (LLPAs) State and federal Wilderness Areas, National Parks, National Preserves, National Wildlife Refuges, California State Parks, CDFW Conservation Areas (Ecological Reserves and Wildlife Areas), CDFW mitigation and conservation easement areas, privately held conservation areas including mitigation banks and land trust lands, and Wilderness Study Areas
	Military Expansion Mitigation Lands (MEMLs) Lands conserved as mitigation for the expansion of Department of Defense installations.
BLM Proposed Land Use Plan Amendment Designations	
	National Landscape Conservation System Proposed conservation designations on BLM-administered lands with nationally significant resources managed for conservation purposes.
	Areas of Critical Environmental Concern Existing and proposed designations on BLM-administered lands of natural or cultural resources determined to require special management attention to protect and prevent irreparable damage to important historic, cultural, or scenic values; fish and wildlife resources; or other natural systems or processes; or to protect life and safety from natural hazards.
	Wildlife Allocation Designations on BLM-administered lands where management emphasizes wildlife values.
Conservation Planning Areas	
	Conservation Planning Areas In each action alternative, the portion of the DRECP Plan-Wide Reserve Design Envelope that falls outside of existing conservation areas and BLM-administered lands. A portion of the DRECP Conservation Area will be assembled by acquiring land or conservation easements from willing sellers in the Conservation Planning Areas to contribute to meeting the Plan-Wide Biological Goals and Objectives.
OTHER LANDS	
	Impervious and Urban Built-up Land Existing developed areas.
	Military Department of Defense installations.
	Open Off Highway Vehicle (OHV) Areas - Imperial Sand Dunes BLM Open OHV Areas within the approved Imperial Sand Dunes Recreation Area Management Plan.
	Open Off Highway Vehicle (OHV) Areas BLM Land Use Plan designations where motorized and non-motorized uses, including cross-country travel, is permitted.
	Johnson Valley OHV Shared Use Area An area adjacent to the Johnson Valley BLM Open OHV Area and Marine Corps Air Ground Combat Center Twentynine Palms designated as a shared use area.
	Tribal Lands Native American administered lands.
	Solar Energy Zones BLM Solar PEIS established zones of potential solar energy development on BLM-administered lands.
	Proposed Feinstein Bill Areas identified for conservation, recreation, and other purposes under the California Desert Protection Act of 2011.
	DRECP Plan Area Boundary The DRECP Plan Area including the Mojave and Sonoran/Colorado Deserts and adjacent areas within California.



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Figure 6. Preferred Alternative – Plan-Wide Development Focus Areas

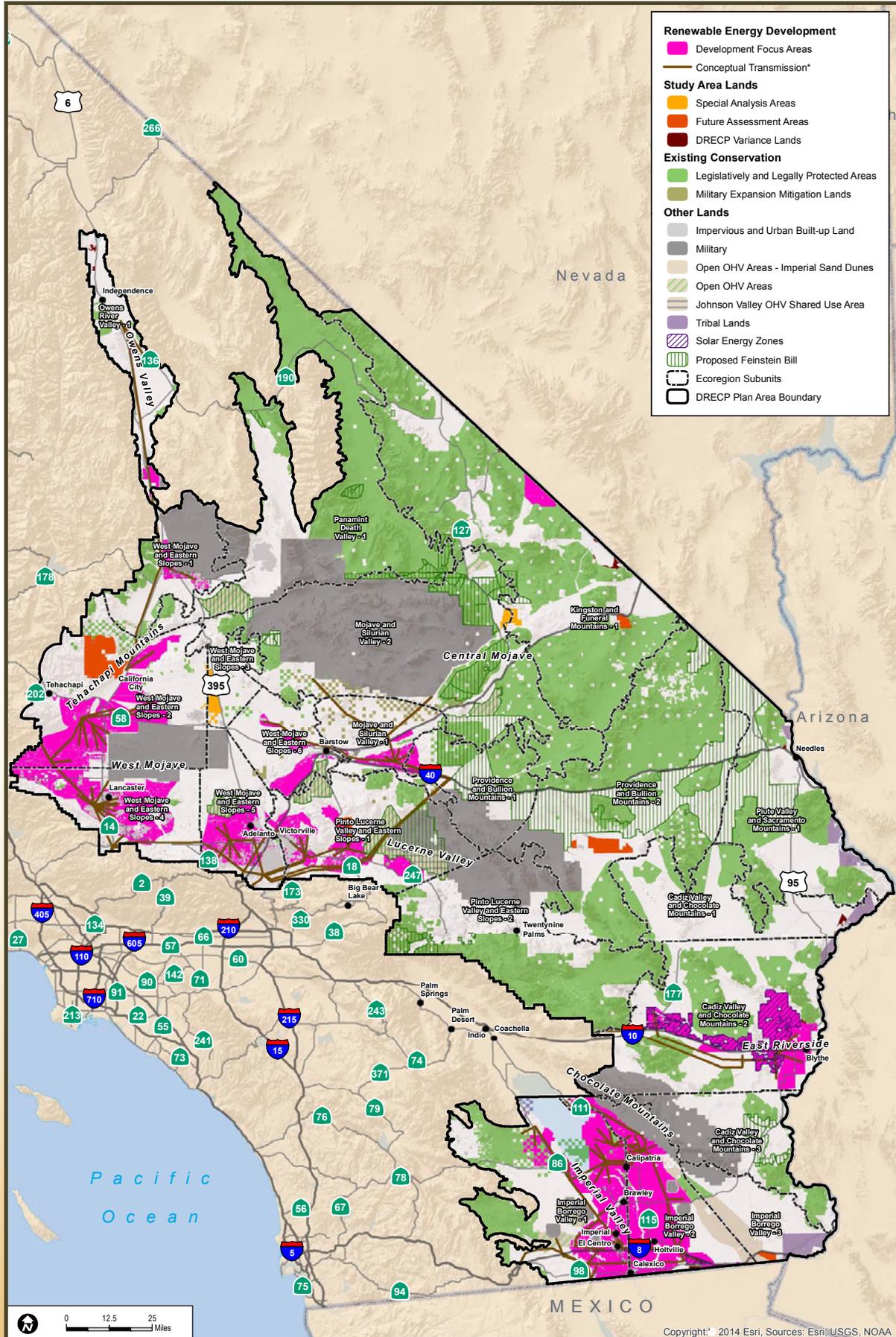
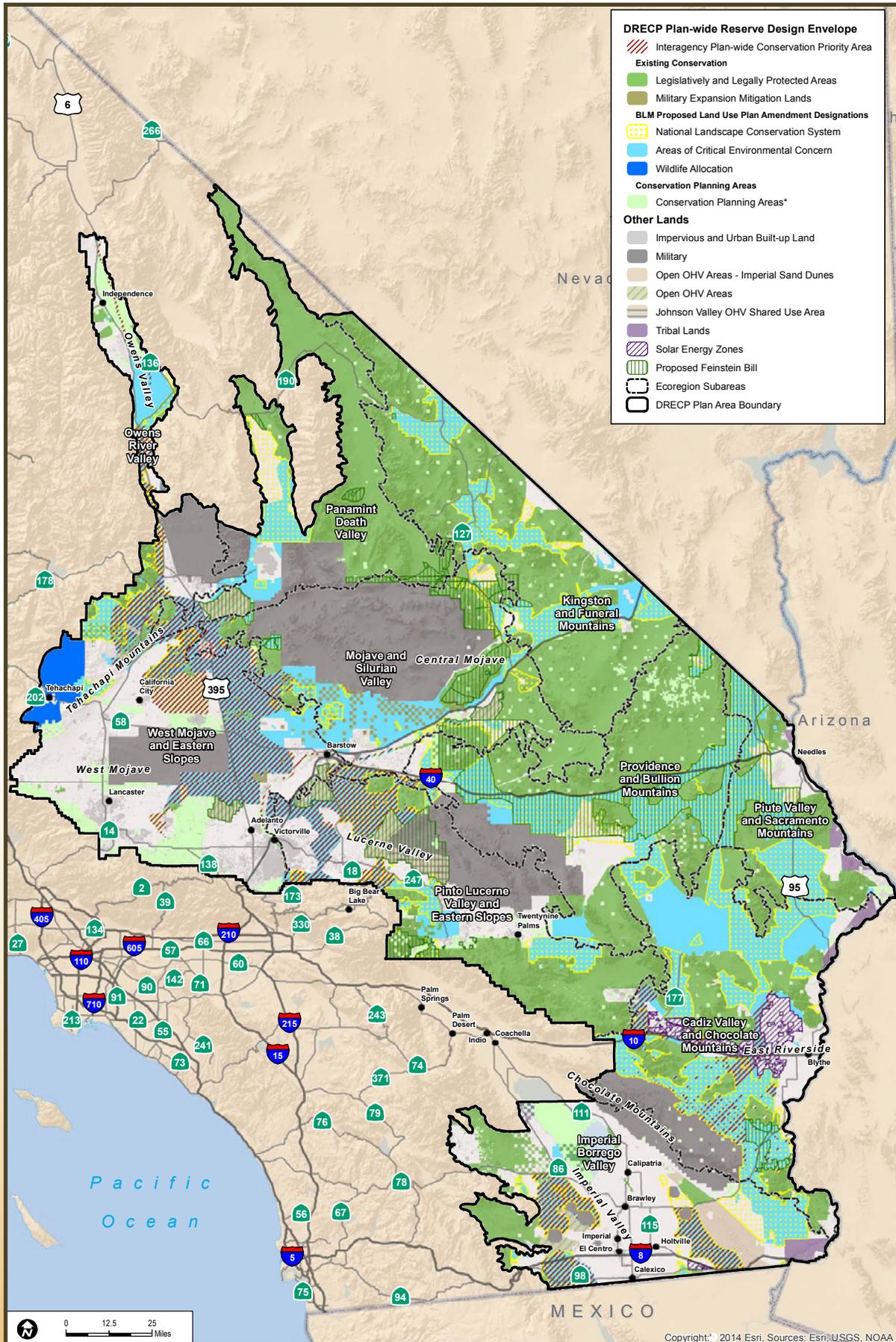


Figure 7. Preferred Alternative – Plan-Wide Reserve Design Envelope



3.2 Preferred Alternative—BLM Land Use Plan Amendment

The BLM LUPA component of the Preferred Alternative would designate 367,000 acres of Development Focus Areas and 106,000 acres of Study Area Lands for renewable energy and transmission on BLM-administered lands (see Exhibit 6). The LUPA would also make the following management decisions.

NATIONAL CONSERVATION LANDS

The Preferred Alternative proposes about 3.5 million acres of BLM-administered land as National Conservation Lands and emphasizes habitat connectivity and cultural-botanical resource locations, with total authorized disturbance limited to 1%.

NATIONAL TRAILS

The Preferred Alternative proposes National Scenic and Historic Trail Management Corridors with widths of 5 miles from the trail centerline for the Pacific Crest Trail, Old Spanish Trail, and the Juan Bautista de Anza Trail. All federally designated trail management corridors would be managed as components of the National Conservation Lands.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

The Preferred Alternative proposes about 1.4 million acres of BLM-administered land as Areas of Critical Environmental Concern, where special management is needed to protect certain values. Most of these areas would limit total authorized disturbance to 1% of the total area.

WILDLIFE ALLOCATIONS

The Preferred Alternative would designate wildlife allocations on about 20,000 acres of BLM-administered land. These provide protection and enhancement of important plant and animal habitats but do not eliminate existing land uses.

SPECIAL RECREATION MANAGEMENT AREAS

Special Recreation Management Areas are public lands managed to be high-priority outdoor recreation areas. The Preferred Alternative would designate 32 Special Recreation Management Areas on BLM-administered land that total 2.7 million acres. The Preferred Alternative would not permit renewable energy in designated off-highway vehicle open areas.

LANDS WITH WILDERNESS CHARACTERISTICS

BLM-administered lands within the planning area that could be affected by renewable energy or other development authorized under the plan were inventoried for wilderness characteristics in 2012 and 2013 under the direction of BLM Manual 6310. Under the Preferred Alternative, nearly 300,000 acres of lands with wilderness characteristics would be managed to protect those characteristics.

CONSERVATION AND MANAGEMENT ACTIONS

As part of the proposed LUPA, Conservation and Management Actions would include proposed changes from the existing management plans for many resources, including air resources, comprehensive trails and travel management, cultural resources and tribal interests, lands and realty, livestock grazing, minerals, paleontology, recreation and visitor services, soil, water, and water-dependent resources, visual resources management, wild horses and burros, and wilderness characteristics.

CALIFORNIA DESERT CONSERVATION AREA

The LUPA would apply some management decisions to the full California Desert Conservation Area, including those areas outside the DRECP boundary. Within the DRECP, the Multiple Use Classifications used to determine land tenure in the California Desert Conservation Area Plan would be replaced by DRECP allocations to govern the management of these areas.

Exhibit 6. BLM LUPA Acres in the Preferred Alternative

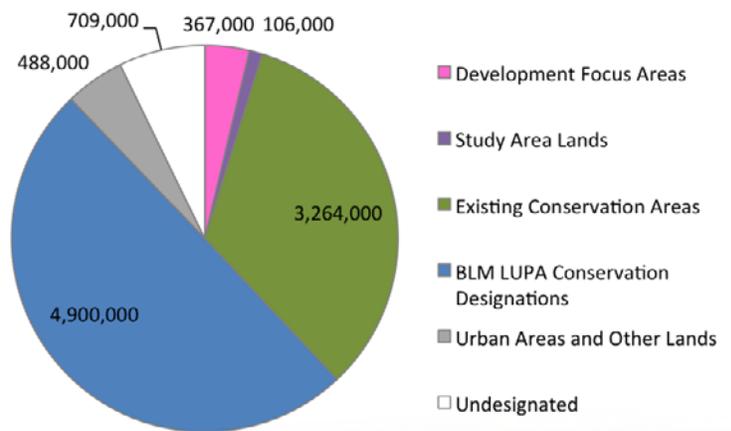
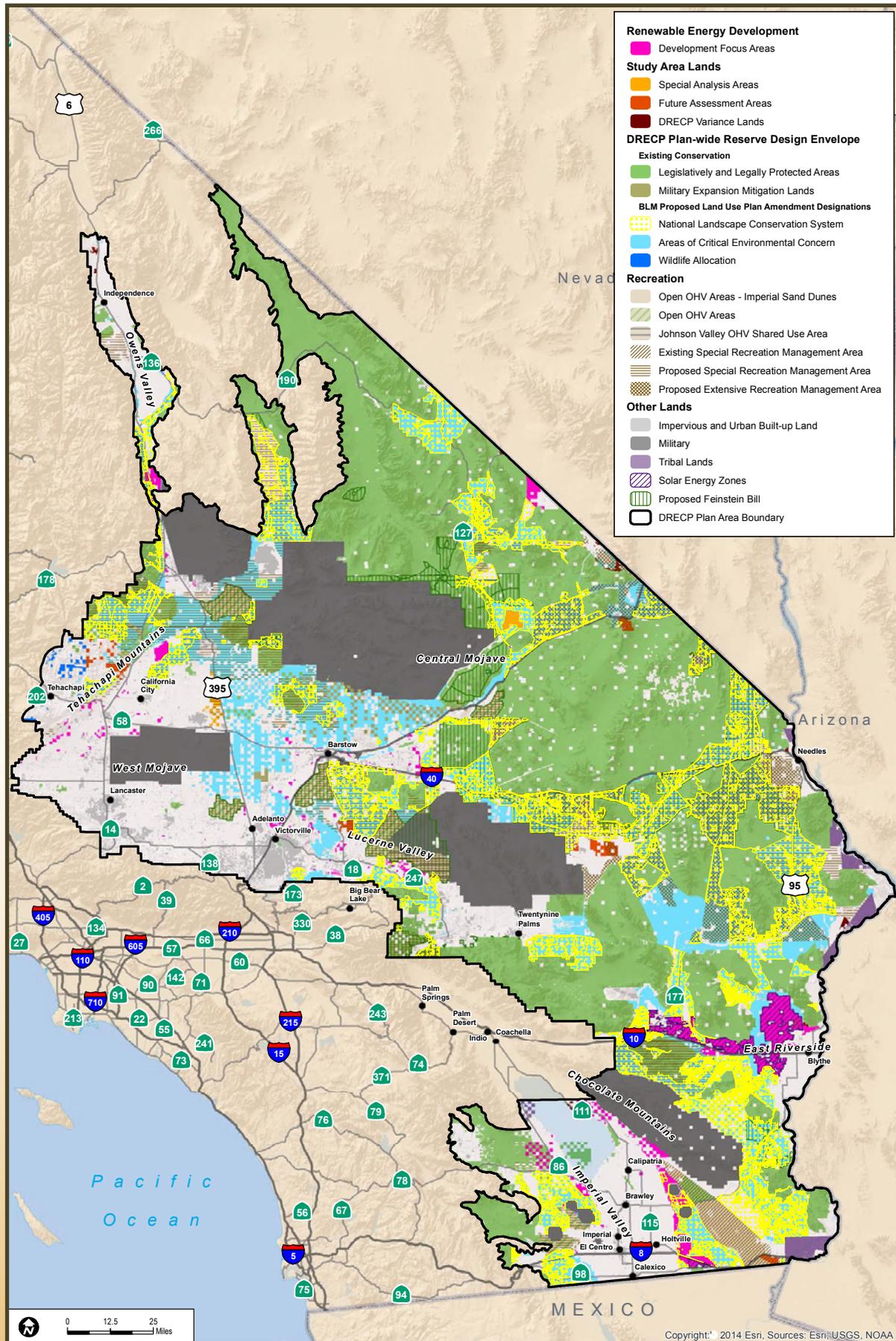


Figure 8. Preferred Alternative – Land Use Plan Amendment



3.3 Preferred Alternative—General Conservation Plan

The USFWS has developed a GCP that provides the framework for a streamlined permitting process for renewable energy development by nonfederal applicants in the Plan Area. The USFWS will consider issuing permits to applicants who submit project proposals that demonstrate consistency with the terms and conditions of the GCP. Any permits issued under the GCP “umbrella” would authorize incidental take of Covered Species for DRECP Covered Activities on nonfederal lands as described in the DRECP. Conservation Planning Areas are nonfederal lands from which permittee mitigation lands would be acquired from willing sellers by fee title or conservation easement. In addition, permittees may be allowed in limited circumstances to fund non-acquisition mitigation measures in BLM LUPA conservation designations and on nonfederal Existing Conservation Lands as described in the DRECP compensation approach (Appendix H).

The GCP is based on the DRECP’s comprehensive conservation strategy for 37 proposed Covered Species, including Biological Goals and Objectives, Conservation and Management Actions, and a DRECP Plan-Wide Reserve Design Envelope. The GCP estimates the maximum level of incidental take of each Covered Species that would result from DRECP Covered Activities on nonfederal lands and the amount of Conservation and Management Actions that would be required to minimize and mitigate the effects of that take to the maximum extent practicable.

Two applicants, the CEC and CSLC, have requested incidental take permits as part of the DRECP. CEC has renewable energy project licensing authority, and CSLC has landowner and project approval jurisdiction, over portions of the nonfederal lands within the Plan Area. The CEC and CSLC application materials are included for public review in Appendix M.

The CEC and CSLC applications incorporate the GCP component of the DRECP by reference and summarize relevant sections of particular importance that need to be highlighted for their respective permit requests. Future applicants under the GCP would also use this approach. Applications will require attachments with additional information on the level of impacts (i.e., incidental take) to Covered Species expected by the proposed project(s), the amount of mitigation lands that would be acquired, and how the proposed permit would fulfill all issuance criteria. The USFWS would begin to consider permit applications to the CEC, CSLC, and any future applicants under the GCP after a Record of Decision for the Final EIR/EIS is signed, and would continue to consider permit applications until an application exceeds the maximum take levels analyzed for the GCP.

Applicants may be state agencies, local governments (such as cities or counties), or individual project proponents. Any of these entities may consider applying for incidental take permits after the DRECP is approved. State agencies and local governments, if issued a permit under

the GCP, would be able to extend their incidental take authorization to qualified third-party renewable energy applicants over which the agency or local government has jurisdiction. Exhibit 7 depicts USFWS GCP acres in the Preferred Alternative.

Exhibit 7. USFWS GCP Acres in the Preferred Alternative

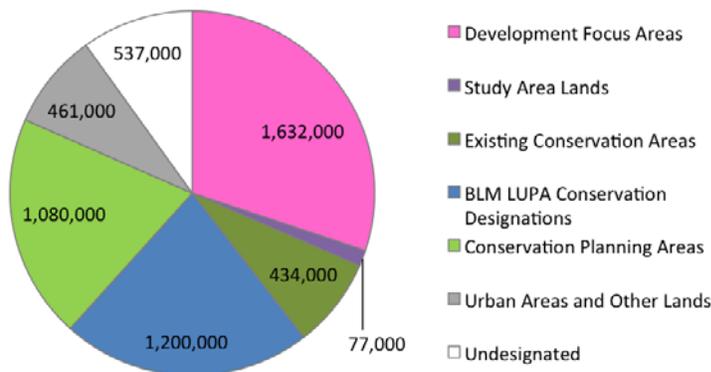
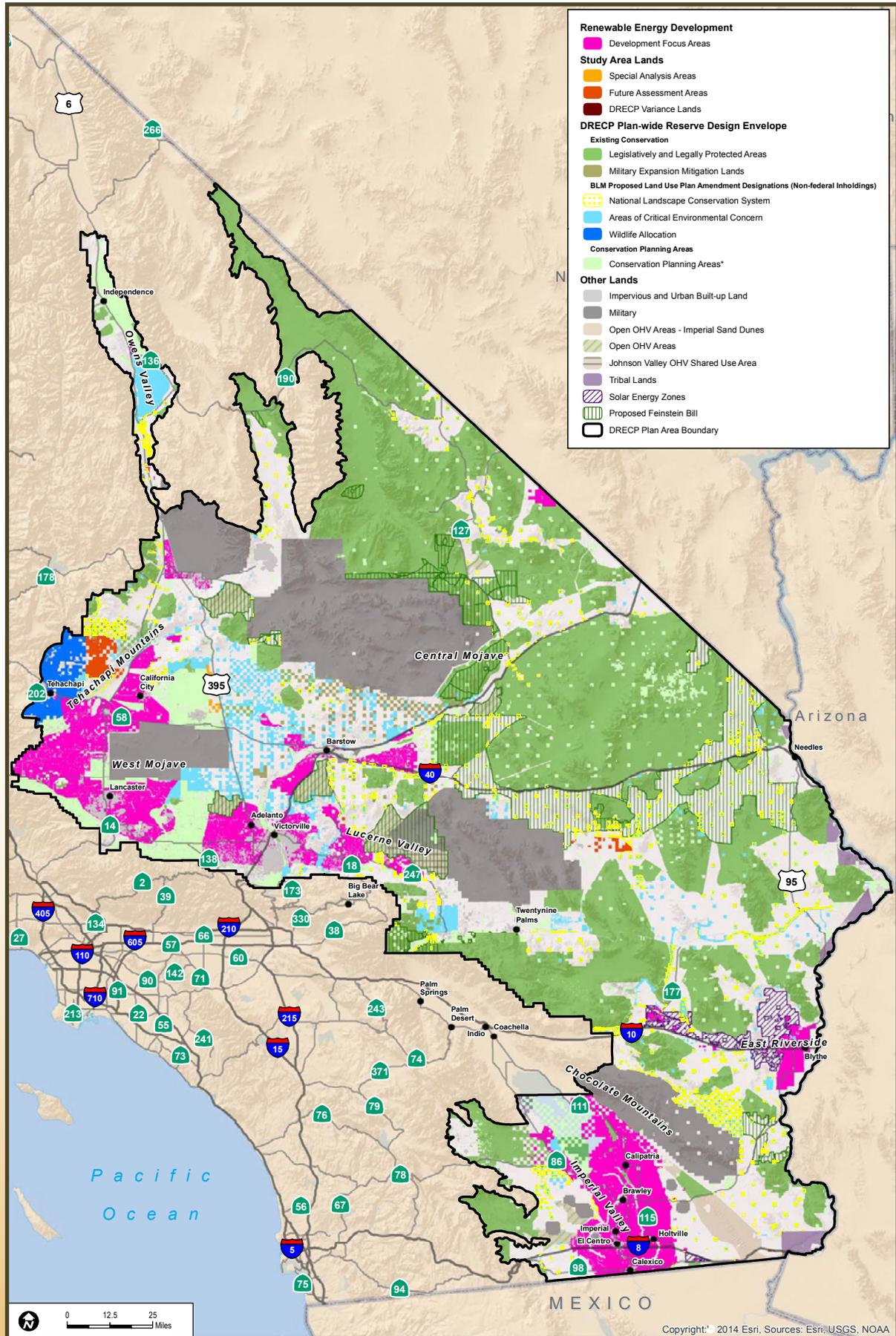


Figure 9. Preferred Alternative – General Conservation Plan



3.4 Preferred Alternative—Natural Community Conservation Plan

The Natural Community Conservation Planning Act requires that NCCPs provide for the conservation and management of Covered Species and natural communities on a landscape or ecosystem level through the creation and long-term management of habitat reserves or other equivalent conservation measures. The following provides an overview of the NCCP elements of the Preferred Alternative. Appendix N provides a more detailed description of the NCCP elements.

The Preferred Alternative includes the full range of Covered Activities anticipated under the DRECP for each of the interagency Plan-Wide alternatives.

The NCCP element of the Preferred Alternative includes the following, which were developed based on, and are nested within, the DRECP Plan-Wide Conservation Strategy:

An **NCCP Conceptual Plan-Wide Reserve Design** defines the areas that are considered to be the highest priority for biological conservation and are consistent with priority conservation, including the Interagency Plan-Wide Conservation Priority Areas and Existing Conservation Lands. The NCCP Conceptual Plan-Wide Reserve Design includes species population centers and landscape linkages that provide both connectivity between large habitat blocks and areas for potential movement in response to climate change. The NCCP Conceptual Plan-Wide Reserve Design includes both BLM lands and other lands, including private land and nonfederal public land.

A **DRECP NCCP Reserve Design**, nested within the NCCP Conceptual Plan-Wide Reserve Design. BLM lands and non-BLM lands within the DRECP NCCP Reserve Design would be conserved and managed to preserve and enhance natural communities and habitat for Covered Species.

The DRECP NCCP Reserve Design includes areas of key biological importance within BLM LUPA conservation designations that would be protected, maintained, and managed to preserve their conservation value for Covered Species for at least the duration of the NCCP. A Management Agreement or other Durability Instrument placed on these key areas would provide assurances of long-term protection and management of conservation values. Durability Instruments could be applied to areas of non-acquisition compensation for a specific project or could be applied as advance mitigation in anticipation of future projects.

Areas of private land included within the DRECP NCCP Reserve Design would be given a high priority for conservation through the purchase of land or conservation easements from willing sellers. Once acquired, these lands would be added to the NCCP Reserve, and would be managed for the long-term for the values for which they were acquired.

Biological Conservation Actions, would occur outside of the DRECP NCCP Reserve Design and NCCP Conceptual Plan-Wide Reserve Design and include the maintenance and management of all of the BLM

LUPA Conservation Designation lands in accordance with the BLM LUPA. The BLM LUPA includes specific management actions for each Conservation Designation, establishes the allowable uses that may be authorized within each Conservation Designation, and describes the DRECP Plan-Wide Conservation and Management Actions that are applied to avoid, minimize and compensate for any effects that result from authorizing the established allowable uses.

Biological Conservation Actions on BLM Conservation Lands outside of the NCCP Conceptual Plan-Wide Reserve Design are essential to the NCCP and the DRECP Plan-Wide Conservation Strategy. Conservation actions on these lands include BLM LUPA management actions that will maintain the significant ecological and scientific values that conserve Covered Species, natural communities, habitat connectivity between existing Legislatively and Legally Protected Areas and large intact landscape blocks, ecosystem processes, and potential climate refugia.

DRECP will fully establish BLM Conservation Lands within the DRECP Plan-Wide Reserve Design Envelope at the time the LUPA Record of Decision is approved.

Taken together, the Biological Conservation Actions on BLM Lands, and the establishment of the DRECP NCCP Reserve during implementation of the plan will provide for the conservation and management of DRECP Covered Species and natural communities, landscape connectivity, ecosystem processes, and other landscape features that promote resiliency in contemplation of climate change. Reserve design features and other conservation actions within the NCCP alternatives are consistent with and nested within the DRECP Plan-Wide Reserve Design Envelope in the interagency Plan-Wide alternatives, but differ in terms of how reserve design features are defined and mapped within the NCCP Conceptual Plan-Wide Reserve Design and the DRECP NCCP Reserve Design. Table 5 summarizes the NCCP elements of the Preferred Alternative. As shown in Table 5, the DRECP NCCP Reserve Design covers approximately 425,000 acres of BLM and non-BLM lands. Exhibit 8 depicts CDFW NCCP acres in the Preferred Alternative.

The NCCP also incorporates the DRECP Monitoring and Adaptive Management Program referenced in Section 2.4.

Exhibit 8. CDFW NCCP Acres in the Preferred Alternative

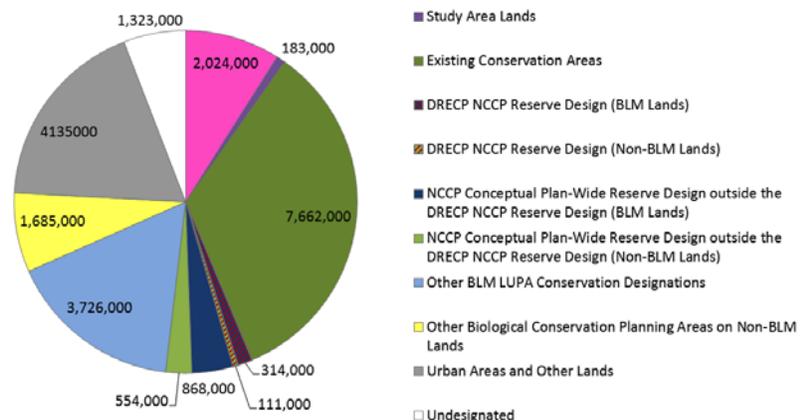


Figure 10. Preferred Alternative – Natural Community Conservation Plan

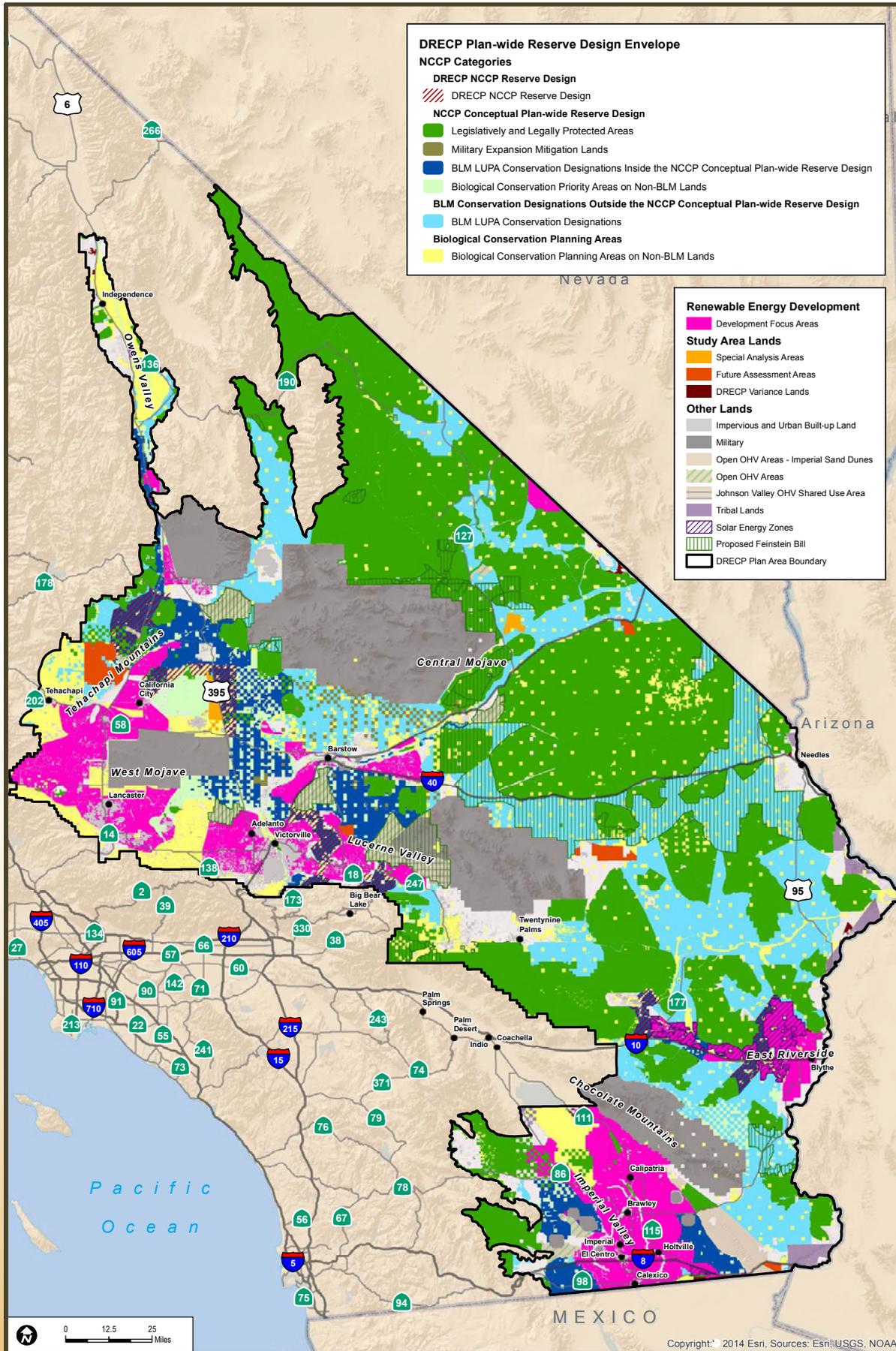


Table 5. NCCP for the Preferred Alternative

NCCP Components	Acreage
Development Focus Areas	2,024,000
Study Area Lands	183,000
Future Assessment Areas	128,000
Special Analysis Areas	42,000
DRECP Variance Lands	13,000
DRECP Plan-Wide Reserve Design Envelope	14,921,000
Existing Conservation Areas	7,662,000
NCCP Conceptual Plan-Wide Reserve Design	1,847,000
Inside the DRECP NCCP Reserve Design	425,000
BLM LUPA Conservation Designations	314,000
Biological Conservation Priority Areas on Non-BLM Lands	111,000
Outside the DRECP NCCP Reserve Design	1,422,000
BLM LUPA Conservation Designations	868,000
Biological Conservation Priority Areas on Non-BLM Lands	554,000
BLM LUPA Conservation Designations outside the NCCP Conceptual Plan-Wide Reserve Design	3,726,000
Biological Conservation Planning Areas on Non-BLM Lands	1,685,000
Urban Areas, Other Lands, and Undesignated Areas	5,457,000
Plan Area Total	22,585,000

Note: The following general rounding rules were applied to acreage values: values greater than 1,000 were rounded to nearest 1,000; values less than 1,000 and greater than 100 were rounded to the nearest 100; values of 100 or less were rounded to the nearest 10, and therefore totals may not sum due to rounding. In cases where subtotals are provided, the subtotals and the totals are individually rounded. The totals are not a sum of the rounded subtotals; therefore the subtotals may not sum to the total within the table.

3.5 Cost and Funding

To be covered under the DRECP, developers of renewable energy projects covered by the DRECP will be required to pay for compensatory mitigation, which in most cases includes the conservation of land containing habitat for Covered Species. Natural communities and other habitat that support Covered Species are conserved to offset impacts to Covered Species. Compensatory mitigation for impacts to Covered Species includes a number of conservation actions, including land acquisition, habitat restoration, land management actions, removal of threats or causes of mortality for Covered Species, and other actions and measures.

The purpose of the cost and funding analysis is to meet requirements in the federal Endangered Species Act and the Natural Community Conservation Planning Act regarding assurances of adequate funding for implementation of GCPs and NCCPs. It does not include a discussion of the cost and funding for the implementation of mitigation for resources other than biological resources or for activities other than

Covered Activities.³ The analysis does not include a discussion of the cost and funding for the implementation of actions under the LUPA to provide mitigation for impacts to other species and habitats and other resources, including but not limited to cultural and recreational resources as that is the responsibility of BLM and considered outside the GCP and NCCP. Costs of LUPA implementation are not included because the LUPA will be implemented within BLM’s budget, based on annual appropriations, as it currently implements land use plans. No additional funding is anticipated.

DRECP implementation costs are estimated on a mix of the cost of acquiring and managing land, and habitat restoration and enhancement on BLM-administered lands and/or other conserved lands to provide compensatory mitigation for impacts to Covered Species.

Acquisition of lands for conservation and mitigation purposes may be accomplished by purchasing land or conservation easements from willing sellers.

The non-acquisition activities include habitat restoration, enhancement, and management. The analysis focuses on four types that are expected to be the predominant methods at this time, but by no means do these represent the entire universe of such measures. Those types include:

- Habitat enhancement
- Fencing and signage
- Roost habitat creation, enhancement, and protection
- Predator, cowbird, or starling control

Description of the Cost Estimation Model and Scenario Analysis

The DRECP Mitigation Cost Model computes the total estimated cost for all mitigation projects on private, public, and residential, agricultural and open space lands in Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino, and San Diego counties.

The model estimates potential costs for a selected alternative using a set of assumptions and parameters about the cost categories, generation build-out, acreage to be acquired or managed for mitigation, and variations in economic and financial parameters.

Cost Evaluation Assumptions and Forecasts

The cost model is driven by specific forecasts and assumptions drawn from the environmental planning and analysis developed for the Plan. Forecasts and assumptions about economic and financial conditions also affect the analysis.

Key Findings

The total costs by county for the DRECP over the planning period to 2040 are shown in Table 6. The mid-case estimate for the total Plan is

³ These other costs could include costs associated with the requirements imposed during the licensing and environmental review process, costs for nonbiological mitigation (e.g., cultural resources, recreational resources, visual resources, and wilderness characteristics), and costs for decommissioning and closure. These costs would be addressed separately on a project-by-project basis through the BLM right-of-way process, CEC licensing process, and CSLC leasing process, and other yet-to-be identified processes such as a county permitting process, as applicable.

\$1.7 billion using a least cost approach. The estimate in the high-cost scenario is \$2.9 billion based on a proportional allocation across available land use types, and \$1.2 billion in the low-cost scenario under the least cost approach. The range of the levelized cost per acre impacted over 25 years is from \$5,600 to \$12,000 based on variations in the assumptions about land acquisition requirements and prices.

Table 6. Range of Total Estimated Cost (in millions) for Biological Objectives Mitigation in the Preferred Alternative

COUNTY	Low	Mid	High
Imperial	\$301.4	\$301.4	\$832.8
Inyo	\$28.4	\$28.4	\$53.0
Kern	\$102.1	\$102.1	\$265.3
Los Angeles	\$49.1	\$49.1	\$288.8
Riverside	\$284.8	\$284.8	\$492.2
San Bernardino	\$404.9	\$404.9	\$812.7
San Diego	\$47.5	\$47.5	\$198.3
TOTAL	\$1,218.2	\$1,674.5	\$2,943.2

Funding Source

The primary source of funding for implementation would be DRECP implementation fees. Each proponent of a Covered Activity would be required to pay an implementation fee sufficient to cover the cost of implementing Conservation and Management Actions needed to mitigate impacts to, and provide for the conservation and management of, Covered Species, as well as a portion of the cost of implementing the Monitoring and Adaptive Management Program and DRECP administrative costs. The agencies would seek additional funding from other appropriate federal, state, and private sources (e.g., public and private grant programs) to implement conservation actions that are not related to the impacts of Covered Activities.

Unlike other multiple species habitat conservation plans, the DRECP will not be funded through a set of standard fixed fees on a per-acre or other unit basis. Instead, costs will be recovered through implementation fees determined and collected on a project-by-project basis. The REAT agencies concluded that the range of potential mitigation actions varied too widely by both Covered Activities and geography to set an appropriate fee schedule. The cost estimates projected here are intended to guide policymakers and to provide stakeholders with a reasonable estimate of project-related costs. The costs and fees for any one individual project or Covered Activity will likely differ from any specific values presented here.

3.6 Action Alternatives

The four DRECP “action alternatives” (Alternatives 1–4) have the same DRECP Plan-Wide Conservation Strategy and Covered Activities as the Preferred Alternative. Each action alternative has different DRECP Plan-

Wide Reserve Envelopes and configurations of Development Focus Areas, which change the likely mix of renewables that could be developed.

Each action alternative’s configuration of Development Focus Areas reflects a somewhat different approach to balancing the goals of minimizing biological resource conflicts and maximizing opportunities to site renewable energy projects in areas of high-value renewable energy resources. Mitigation approaches embedded in the conservation strategies for the alternatives also reflect this process with Alternative 1 emphasizing avoidance, Alternative 2 with more emphasis on compensation, and the Preferred Alternative and Alternatives 3 and 4 representing variations of balance between avoidance and compensation, all within the context of siting Development Focus Areas within areas of high-value renewable energy resources.

Each action alternative also reflects a different balance of land use allocations for the full range of land uses on BLM lands, such as biological, recreational, cultural, scenic, and mineral resources. In addition, the action alternatives take into consideration the regional, statewide, and national importance of resource values on BLM lands (not just Plan-Wide importance) as well as the relatively recent analysis in the Solar Programmatic EIS of appropriate areas for solar development on BLM lands.⁵

The Development Focus Areas, reserve design, and LUPA proposals were integrated to create the range of alternatives analyzed in detail in the DRECP. In general, the Preferred Alternative represents the alternative considered by the agencies to best balance the DRECP planning goals.

Like the Preferred Alternative, Alternatives 1–4 are responsive to input received during scoping, tribal input, other public/stakeholder comments received during the planning process, input from local governments, and independent science input. Alternative 1 emphasizes low biological resource conflict areas as requested by environmental nongovernmental organizations and local communities. Alternative 2 emphasizes siting and design flexibility as requested by renewable energy industry representatives. Alternatives 3 and 4 are variations on the themes of Alternatives 1 and 2 with additional consideration of ways to represent and consider BLM variance lands as identified in the BLM Solar Programmatic EIS.

3.7 No Action Alternative

The No Action Alternative describes the scenario in which the agencies do not approve the DRECP. It is a continuation of current management practices. Renewable energy and transmission development and mitigation for such projects in the Plan Area would continue to occur on a project-by-project basis but this development would not be constrained to Development Focus Areas and would not be streamlined. In addition, mitigation would not be guided by a comprehensive regional conservation strategy.

⁵ BLM (Bureau of Land Management) and DOE (U.S. Department of Energy). 2012. *Final Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States*. 8 vols. DES 10-59; DOE/EIS-0403. July 2012. <http://solareis.anl.gov/documents/dpeis/index.cfm>. applicable.

3.8 DRECP Alternatives Comparison

Table 7. Summary of the Draft DRECP Alternatives

	PREFERRED ALTERNATIVE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	NO ACTION ALTERNATIVE	
Renewable Energy Development							
Total acres of Development Focus Areas ¹	2,024,000	1,070,000	2,473,000	1,405,000	1,608,000	6,285,000	
Total acres of public land within Development Focus Areas ¹	Federal	392,000 (19%)	99,000 (9%)	743,000 (30%)	231,000 (17%)	276,000 (17%)	2,854,000 (45%)
	Nonfederal	64,000 (3%)	55,000 (5%)	81,000 (3%)	62,000 (4%)	61,000 (4%)	188,000 (3%)
Total acres of private (Nonfederal) lands within Development Focus Areas ¹	1,569,000 (78%)	916,000 (86%)	1,649,000 (67%)	1,113,000 (79%)	1,272,000 (79%)	3,244,000 (52%)	
Total estimated footprint impacts (all RE technologies and transmission) ²	177,000	182,000	169,000	182,000	177,000	158,000	
Study Area Lands ³	DRECP Variance Lands ⁴ (acres)	13,000	37,000	—	—	588,000	588,000
	Future Assessment Areas (acres)	128,000	—	109,000	11,000	—	NA
	Special Analysis Areas (acres)	42,000	—	—	—	—	NA
Conservation							
Existing Conservation	7,662,000	7,662,000	7,662,000	7,662,000	7,662,000	7,662,000	
BLM LUPA Conservation Designations ⁵	National Landscape Conservation System lands	3,984,000	1,682,000	5,124,000	3,845,000	3,012,000	NA
	Areas of Critical Environmental Concern	1,976,000	3,609,000	1,104,000	2,272,000	2,148,000	2,966,000
	Wildlife Allocation	157,000	799,000	14,000	144,000	446,000	NA
Conservation Planning Areas ⁶	1,142,000	1,287,000	1,183,000	1,238,000	1,210,000	NA	
Estimated Compensation for footprint impacts ⁷	284,000	237,000	499,000	259,000	275,000	Project-by-Project	
Recreation⁸							
Areas Managed for Recreation Emphasis	—	—	—	—	—	1,465,000	
Existing Special Recreation Management Areas	193,000	193,000	193,000	193,000	193,000	193,000	
Proposed Special Recreation Management Areas	2,531,000	2,537,000	2,463,000	2,531,000	2,489,000	—	
Proposed Extensive Recreation Management Areas	879,000	—	—	—	—	—	
Open Off-Highway Vehicle/Special Recreation Management Area	321,000	321,000	321,000	321,000	321,000	321,000	

¹There are no Development Focus Areas under the No Action Alternative. Acreage reported here for the No Action Alternative is the area available for renewable energy development where megawatts have been assigned in a spatial distribution that mimics current development patterns and technology mixes.

²For the action alternatives, the estimated ground disturbance is based on the aggregated high scenario for megawatt distribution, which overestimates the amount of megawatts needed in the Development Focus Areas in each ecoregion subarea in order to provide greater siting flexibility. The authorized ground disturbance under the DRECP would be limited to the amount of disturbance needed to accommodate 20,000 megawatts of renewable energy development. The ground disturbance estimate for the No Action Alternative does not use an aggregated high scenario for megawatt distribution; the No Action Alternative is based on a spatial distribution of the planned 20,000 megawatts in a spatial distribution that mimics current development patterns and technology mixes. Impacts reported here include project footprint impacts; the impacts reported here do not reflect operational impacts. For solar, ground-mounted distributed generation, geothermal, and transmission development, the footprint impacts include all short-term and long-term impacts associated with facility construction, assumed to be equivalent to the “project area” and/or right-of-way within which all project facilities would be built. For wind development, the footprint impacts include all short-term and long-term impacts associated with facility construction, which is not equivalent to the “project area” and/or right-of-way necessary for wind project siting. Effects associated with the wind “project area” are addressed under operational impacts. Operational effects for all technologies are discussed Chapter IV.7, Biological Resources, and are not reported in this table.

³Study Area Lands are lands that are available for renewable energy development but are outside Development Focus Areas and not streamlined under DRECP (DRECP Variance Lands), lands that may become available (Future Assessment Areas), or lands that would require special analysis before determining if they are or are not available (Special Analysis Areas) for renewable energy development. Renewable energy development on Study Area Lands is not covered by the DRECP. Therefore, megawatts were not distributed to and impacts were not analyzed within Study Area Lands in any alternatives that they occur. Conversely, Study Area Lands are not part of the reserve design in any of the alternatives that they occur, and resources within these lands were not considered conserved in the conservation analysis.

⁴DRECP Variance Lands represent the BLM Solar Programmatic EIS Variance Lands and other BLM lands identified through the LUPA as screened for the DRECP using BLM screening criteria. Alternative 4 and the No Action Alternative include the full extent of the Solar Programmatic EIS Variance Lands within the DRECP.

⁵BLM LUPA Conservation Designation acreage reported here includes the full extent of the conservation designation, which is BLM-administered land and non-BLM inholdings lands within the matrix of public lands, consistent with the standard BLM mapping approach for BLM resource management plans. There is no LUPA under the No Action Alternative; Areas of Critical Environmental Concern acreage reported here includes the existing Areas of Critical Environmental Concerns within the Plan Area outside of the Legally and Legislatively Protected Areas and Military Expansion Mitigation Lands. National Landscape Conservation System overlaps with Areas of Critical Environmental Concern or Wildlife Allocation are reported as National Landscape Conservation System. [CONT'D on page 43]

Exhibit 9. Reserve Design Lands by County by Alternative (% of County in Plan Area)

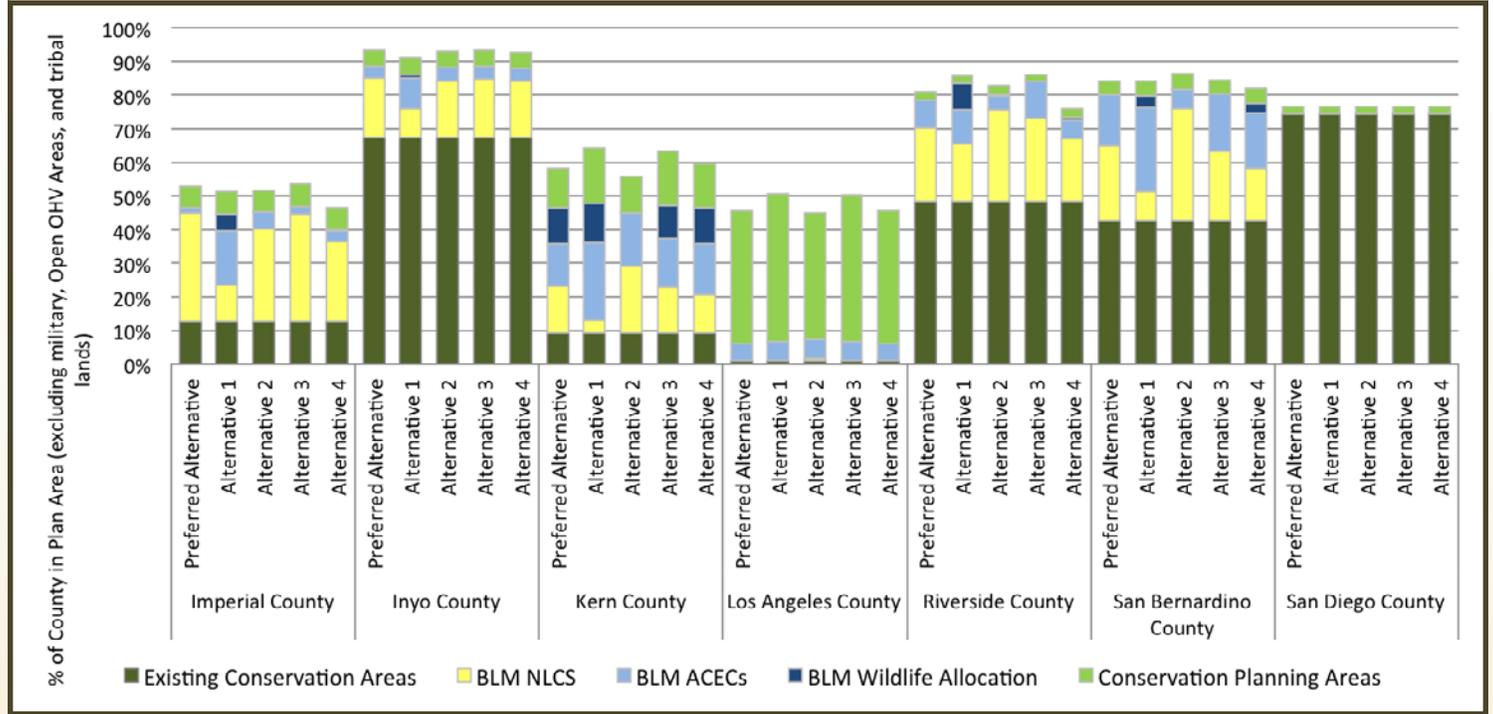


Exhibit 10. Technology Type by County by Alternative

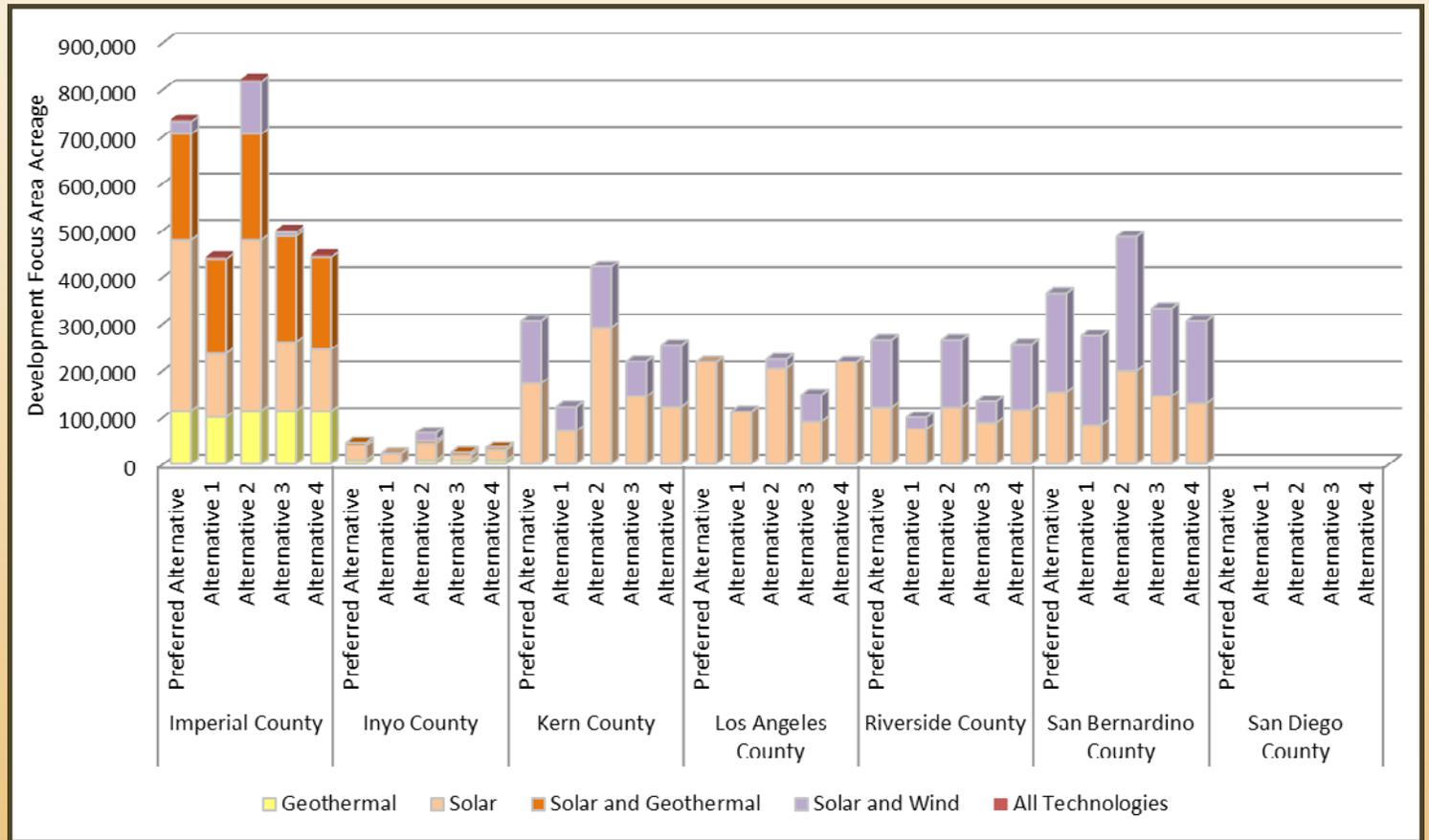
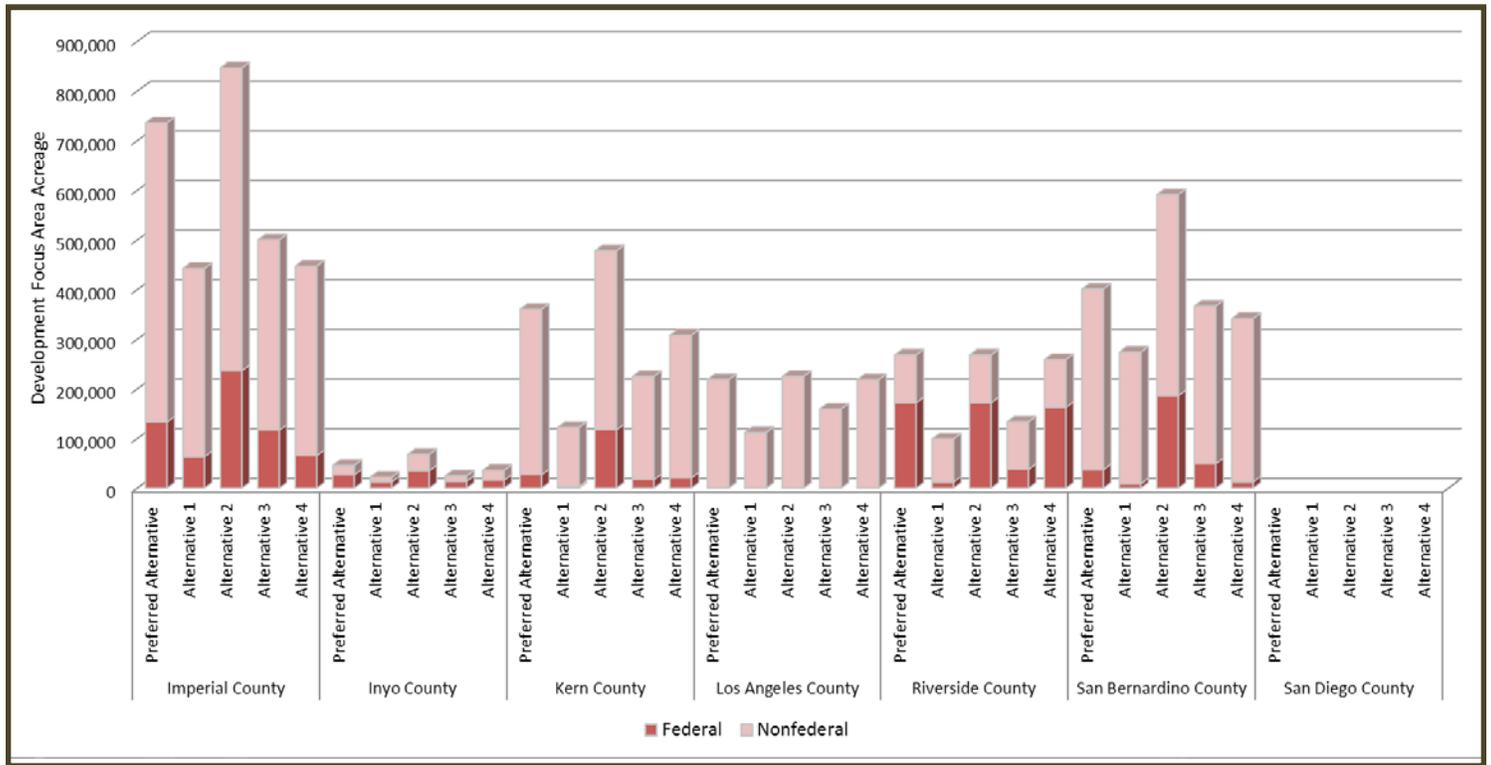


Exhibit 11. Development Focus Area Ownership by County by Alternative



[CONT'D from page 40]

⁶ Conservation Planning Areas represent the portions of the reserve design in each alternative outside of Legally and Legislatively Protected Areas, Military Expansion Mitigation Lands, and BLM LUPA conservation designations. Conservation Planning Areas are where priority areas will be identified for acquisition from willing sellers and conservation actions as compensation for Covered Activities.

⁷ Estimated compensation includes compensation for footprint impacts and terrestrial operational impacts for all technologies; compensation for the effects of operations on bird and bats is addressed separately. This is an acquisition-based estimate. Equivalent non-acquisition based compensation that employs accepted management actions may be used as compensation. This compensation estimate may be used to establish a fee-based program for implementing the DRECP compensation program, and criteria have been established for directing compensation actions.

⁸ The Open Off-Highway Vehicle acres for the No Action Alternative do not include the acres associated with the Imperial Sand Dune Recreation Area because those acres are included as part of the existing Special Recreation Management Areas. All Open Off-Highway Vehicle acres not currently designated as Special Recreation Management Areas would be designated as Special Recreation Management Areas as part of the DRECP. As such, the 321,000 acres are included in the Proposed Special Recreation Management Area acres. Portions of the Special Recreation Management Areas and Extensive Recreation Management Areas overlap the Study Area Lands and Conservation categories shown above.

3.9 BLM Land Use Plan Amendment Alternatives Comparison

BLM LUPA alternatives include a Preferred Alternative and four action alternatives nested within the Plan-Wide Preferred Alternative and action alternatives. The BLM LUPA No Action Alternative assumes existing designations and management prescriptions would remain on BLM-administered lands. Each of the action alternatives include variations in conservation lands designations, as well as variations in management prescriptions on BLM-administered lands. Each action alternative also includes recreation designations.



Exhibit 12. BLM LUPA Conservation Designations

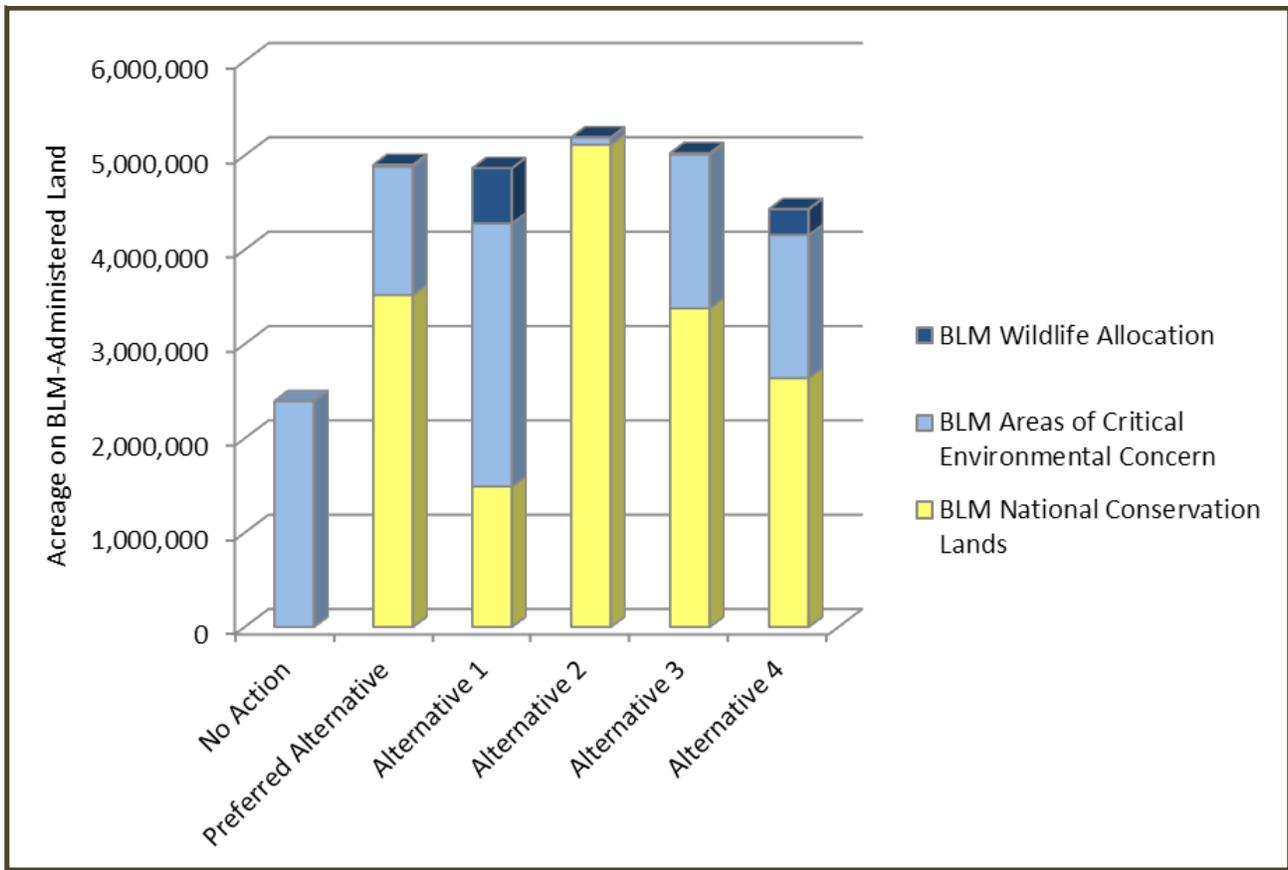
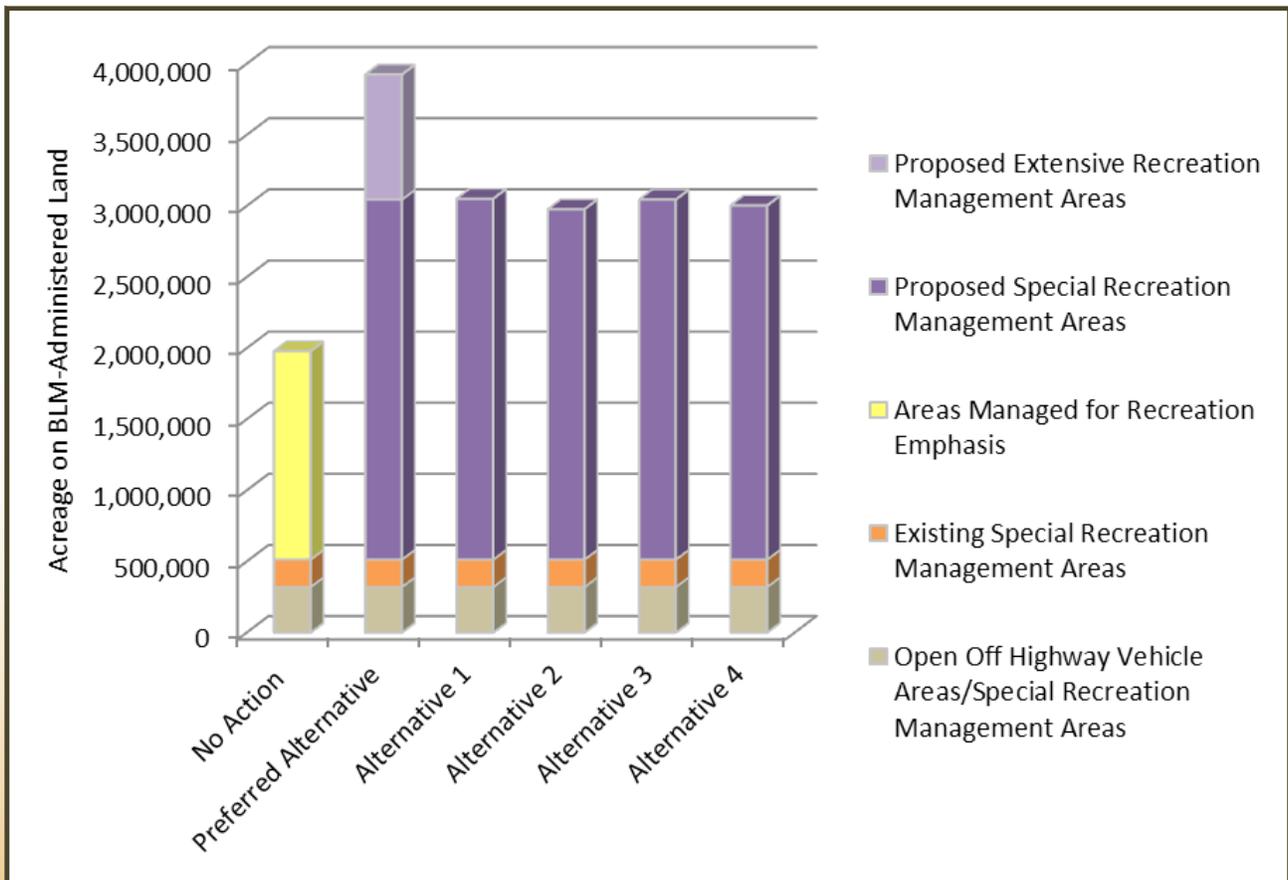


Exhibit 13. BLM LUPA Recreation Designations



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PART FOUR
ENVIRONMENTAL ANALYSIS





4.1 California Environmental Quality Act and National Environmental Policy Act Compliance

This document is prepared in compliance with both the CEQA and NEPA, which share the goal of facilitating informed governmental decision making regarding projects and operations that may affect the environment. The implementing regulations for both laws are designed to allow flexibility in consolidating and avoiding duplication among federal and state environmental review. While some specifics of each law define varying requirements, the two laws are similar, both in overall intent and in the review processes that they dictate. Both statutes encourage a joint federal and state review where a project requires both federal and state approvals.

The lead agency under CEQA is the CEC, and co-lead agencies for NEPA are the BLM and USFWS. BLM issued its Notice of Intent to Prepare an EIS on November 20, 2009. BLM and USFWS issued a joint Notice of Intent to prepare an EIS on July 29, 2011, and the CEC issued a Notice of Preparation of an EIR on July 29, 2011, as well. This Programmatic EIR/EIS reflects the cooperation of multiple state and federal agencies. Under NEPA, the National Park Service, Department of Defense, and the California Independent System Operator are cooperating agencies. Under CEQA, responsible agencies include the CDFW and CSLC.

PROGRAMMATIC ENVIRONMENTAL IMPACT ASSESSMENT

Under CEQA, the purpose of a Programmatic EIR is to allow a lead agency to “consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts” (14 CCR 15168[b] [4]). Similarly, under NEPA, a Programmatic EIS is prepared to consider “broad federal actions such as the adoption of new agency programs or regulations... timed to coincide with meaningful points in agency planning and decision making” (40 CFR 1502.4[b]). This programmatic document discusses at a broad level the general environmental

consequences of this complex, long-term program and describes regional impacts within the Plan Area.

This Draft DRECP and EIR/EIS describes, in general terms, potential environmental, economic, and social effects of the Plan. The discussion of cumulative and growth-inducing impacts is also general and corresponds to the level of analysis required for a Programmatic EIR/EIS. Mitigation strategies are provided for use with future tiered projects to avoid or reduce the severity of significant adverse environmental consequences.

The precise impacts of individual projects cannot readily be identified at this early planning stage; additional CEQA and NEPA documents will be prepared to address project-specific analyses when additional information on specific proposed projects is available. This analysis can be approached the same way for both laws, but each law requires certain issues to specifically be addressed. CEQA and NEPA are designed to identify significant environmental impacts; however, they have slightly different definitions and approaches to determining significance.

APPROACH TO ENVIRONMENTAL ANALYSIS

Environmental Baseline

The “environmental setting” (CEQA) and “affected environment” (NEPA) together make up the environmental baseline used to determine the effects of the Plan. The environmental baseline is the same for both NEPA and CEQA. Based on the time required to prepare this EIR/EIS, the many renewable energy projects that have been built in the past 5 years, and the desire to use current data to the extent practicable, the lead agencies have established that October 15, 2013, as the baseline date for this EIR/EIS.

Components of Impact Analysis

The impact analysis for each environmental resource addresses the potential effects of all of the following aspects of the Plan, both within the Plan Area and outside of it.

Environmental Effects Within the Plan Area

Within the Plan Area, effects could result from three major components of each alternative:

- Renewable energy and transmission development: The impacts of site characterization, construction and decommissioning, and operations and maintenance are considered for solar, wind, and geothermal projects, as well as for electric transmission and substations.
- Reserve design and Conservation and Management Actions: The analysis considers the potential effects of the designated conservation areas and management actions that would minimize and mitigate the effects of incidental take of Covered Species.
- BLM LUPA: In order to approve the plan amendments incorporated with an alternative, specific impact assessment of the proposed changes, in addition to Reserve Design and Conservation and Management Actions, is required. For each alternative, the LUPA includes designation of Special Recreation Management Areas and Extensive Recreation Management Areas; establishes Visual Resource Management classes; establishes National Trail Corridors; nominates National Recreational Trails; and closes some grazing allotments.

Impact analysis includes consideration of direct impacts, indirect impacts, and cumulative impacts.⁵

Environmental Effects Outside of the Plan Area

Plan implementation would create effects outside of the Plan Area for two reasons. First, transmission facilities would have to be constructed or upgraded between the renewable generation facility locations and the areas with the highest electricity demand. The regions outside of the Plan Area that could be traversed by potential new transmission lines are in central and coastal San Diego, Riverside, and Los Angeles counties, as well as in the San Joaquin Valley. The second type of impact occurring outside of the Plan Area results from the differences between the BLM’s California Desert Conservation Area Plan boundary and the Plan Area boundary. The LUPA would result in planning changes outside the Plan Area but within the California Desert Conservation Area Plan boundaries because the California Desert Conservation Area Plan extends outside of the Plan Area. The effects of both transmission and LUPA components outside of the Plan Area are analyzed in the EIR/EIS.

4.2 Summary of Environmental Impacts

This EIR/EIS considers impacts in 23 disciplines, listed in Table 8. For many of these disciplines, the environmental impacts of imple-

menting the Plan would be adverse, but these impacts can be reduced substantially with recommended mitigation measures. Impact reduction also results from implementation of existing laws and regulations, the adopted requirements of the BLM’s Solar Programmatic EIS, and specific conservation and management actions that are defined as components of each alternative.

This EIR/EIS evaluates the potential for environmental impacts to oc-

Table 8. Environmental Disciplines Analyzed

Air Quality	BLM Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics**
Meteorology and Climate Change	Mineral Resources
Geology and Soils	Livestock Grazing**
Flood Hazard, Hydrology, and Drainage	Wild Horses and Burros**
Groundwater, Water Supply, and Water Quality	Outdoor Recreation
Biological Resources	Transportation and Public Access
Cultural Resources	Visual Resources
Native American Interests	Noise and Vibration
Paleontological Resources	Public Safety and Services
Land Use and Policies	Socioeconomics and Environmental Justice
Agricultural Land and Production	Department of Defense Lands and Operations**
BLM Lands and Realty—Rights-of-Way and Land Tenure**	

** The five resources in Table 8 marked with asterisks are analyzed only under NEPA and not under CEQA. These environmental disciplines are only relevant to federal lands and federal land management policies.

cur in multiple impact categories for each of the resources defined in Table 8. As a result, there are nearly 80 separate impacts evaluated. Of these, the analysis identified a number of impacts that could not be eliminated or reduced below significant levels with mitigation measures based on the CEQA definition of significance. The remaining impacts would be less severe: they are either prevented from occurring by alternative design features (e.g., conservation lands), or mitigation measures have been developed to reduce impact severity or avoid the impact. These two categories of impacts are described below.

LESS THAN SIGNIFICANT IMPACTS

The majority of impacts—80% of them—analyzed in this EIR/EIS were found not to be significant under CEQA, primarily because the Conservation and Management Actions defined for each alternative to protect resources in the Plan Area would ensure that impacts are minimized. In some cases, additional mitigation measures are recommended

⁵ **Direct impacts** are immediate, clearly connected consequences of a development project, such as tree removal to create space for a building. **Indirect impacts** are secondary consequences of an action such as soil erosion occurring after an existing water drainage pattern has been altered, through an action such as tree removal. **Cumulative impacts**, such as many trees removed at numerous locations, result from the collective effects of multiple projects being developed in a region.

to strengthen resource protection. These impacts are summarized in Chapter IV.26 of the EIR/EIS.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

The most severe impacts identified in this EIR/EIS are those for which mitigation measures or compensation strategies would not be effective in reducing impact severity. These impacts remain significant, and are identified here in accordance with CEQA Guidelines.

Table 9 presents a summary of the significant impacts for the No Action Alternative compared with the five Plan Alternatives (or “action alternatives”). The table also lists the mitigation measures presented for each significant impact, and identifies the impacts that contribute to cumulatively considerable effects.

This EIR/EIS describes the impacts that would result from the Plan in about 80 categories, within the 23 disciplines listed in Table 8. Of these 80 impact categories, there are significant unmitigable impacts defined for 17 impacts. The largest number of these (8 impacts) would occur only in the No Action Alternative. This alternative would not have the conservation and LUPA benefits of the action alternatives.

Table 9. Summary of Impacts by Environmental Topic

Discipline and Impact Description	X = Significant and Unavoidable Impacts	
	No Action Alternative	Preferred Alt. & Alts. 1-4
<p>Meteorology & Climate Change <i>Impact MC-2:</i> Construction or operation of plan components would conflict with an applicable plan, policy, or regulation intended to address climate change</p> <ul style="list-style-type: none"> No mitigation available Cumulatively considerable for No Action Alternative only 	X	Less than Significant*
<p>Groundwater, Water Supply, and Water Quality <i>Impact GW-2:</i> Groundwater consumption lowers groundwater levels, depletes water supplies, and affects groundwater discharge.</p> <ul style="list-style-type: none"> Typical mitigation would not reduce impact to less than significant for the No Action Alternative No feasible mitigation for geothermal for all alternatives Cumulatively considerable for all alternatives because of geothermal water demand 	X	X Geothermal Only --- Less than Significant for Solar and Wind*

Discipline and Impact Description	X = Significant and Unavoidable Impacts	
	No Action Alternative	Preferred Alt. & Alts. 1-4
<p>Biological Resources <i>Impact BR-1:</i> Siting, construction, decommissioning, and operational activities would result in loss of native vegetation</p> <ul style="list-style-type: none"> Typical mitigation would not reduce impact to less than significant for the No Action Alternative Cumulatively considerable for No Action Alternative only 	X	Less than Significant*
<p><i>Impact BR-4:</i> Siting, construction, decommissioning, and operational activities would result in loss of listed and sensitive plants; disturbance, injury, and mortality of listed and sensitive wildlife; and habitat for listed and sensitive plants and wildlife.</p> <ul style="list-style-type: none"> Typical mitigation would not reduce impact to less than significant for the No Action Alternative Cumulatively considerable for Alternative 2 and No Action Alternative only 	X	X Alt. 2 Only --- Less than Significant for other Alternatives*
<p><i>Impact BR-6:</i> Siting, construction, decommissioning, and operational activities would adversely affect habitat linkages and wildlife movement corridors, the movement of fish, and native wildlife nursery sites</p> <ul style="list-style-type: none"> Typical mitigation would not reduce impact to less than significant for the No Action Alternative Cumulatively considerable for Alternative 2 and No Action Alternative only 	X	X Alt. 2 Only --- Less than Significant for other Alternatives*
<p><i>Impact BR-7:</i> Siting, construction, decommissioning, and operational activities would result in habitat fragmentation and isolation of populations of listed and sensitive plants and wildlife</p> <ul style="list-style-type: none"> Typical project-specific mitigation would not reduce impacts to less than significant for the No Action Alternative Cumulatively considerable for No Action Alternative only 	X	Less than Significant*
<p><i>Impact BR-9:</i> Operational activities would result in avian and bat injury and mortality from collisions, thermal flux or electrocution at generation and transmission facilities</p> <ul style="list-style-type: none"> Typical project-specific mitigation would not reduce impacts to less than significant for the No Action Alternative Cumulatively considerable for No Action Alternative only 	X	Less than Significant*

Discipline and Impact Description	X = Significant and Unavoidable Impacts	
	No Action Alternative	Preferred Alt. & Alts. 1-4
<p>Cultural Resources</p> <p>Impact CR-2: Plan components could affect prehistoric resources</p> <ul style="list-style-type: none"> Mitigation Measure CR-2a (Protect prehistoric resources) would be required but would not reduce impact to less than significant Cumulatively considerable impact for all alternatives 	X	X
<p>Impact CR-3: Plan components could disturb human remains or cultural items, including funerary objects, sacred objects, and objects of cultural patrimony</p> <ul style="list-style-type: none"> Mitigation Measure CR-3a (Protect human remains and associated items) would be required but would not reduce impact to less than significant Cumulatively considerable impact for all alternatives 	X	X
<p>Impact CR-4: Plan components could affect cultural landscapes</p> <ul style="list-style-type: none"> Mitigation Measures CR-4a (Protect cultural landscapes) would be required but would not reduce impact to less than significant Cumulatively considerable impact for all alternatives 	X	X
<p>Native American Concerns</p> <p>Impact TL-1: Plan components could disproportionately affect resources of cultural and spiritual importance to tribes</p> <ul style="list-style-type: none"> Mitigation Measure TL-1a (Protect tribal resources) would be required but would not reduce impact to less than significant Cumulatively considerable impact for all alternatives 	X	X
<p>Impact TL-2: Costs associated with the participation in environmental documents required by the Plan would be disproportionately borne by tribal governments and organizations</p> <ul style="list-style-type: none"> Mitigation Measure TL-2a (Provide support to tribal governments) would be required but would not reduce impact to less than significant Cumulatively considerable impact for all alternatives 	X	X
<p>Paleontology</p> <p>Impact PR-1: Land disturbance could result in loss, damage or destruction of significant paleontological resources</p> <ul style="list-style-type: none"> Typical mitigation would not reduce impact to less than significant for the No Action Alternative Cumulatively considerable impact for No Action Alternative only 	X	Less than Significant*

Discipline and Impact Description	X = Significant and Unavoidable Impacts	
	No Action Alternative	Preferred Alt. & Alts. 1-4
<p>Agricultural Resources</p> <p>Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts. Four mitigation measures are presented, but these would not reduce the impact to less than significant:</p> <ul style="list-style-type: none"> AG-1a: Minimize impacts to agricultural resources AG-1b: Develop an agricultural resources protection plan AG-1c: Compensate for loss of Important Farmland AG-1d: Ensure compatibility with or terminate Williamson Act Contracts Cumulatively considerable impact for all alternatives 	X	X
<p>Mineral Resources</p> <p>Impact MR-1: Plan components would reduce or improve access to and development of known and future mineral resources</p> <ul style="list-style-type: none"> Mitigation Measures MR-1a (Coordinate to ensure access to mineral resources) would be required but would not reduce impact to less than significant for the Preferred Alternative and Alternatives 1 through 4 due to restricted access to reserve lands. Cumulatively considerable impact for all action alternatives 	Less than Significant*	X
<p>Outdoor Recreation</p> <p>Impact OR-1: Plan components could enhance or degrade recreational use</p> <ul style="list-style-type: none"> No mitigation is recommended; CMAs protect recreational resources to the extent feasible Cumulatively considerable impact for all alternatives 	X	X
<p>Visual Resources</p> <p>Impact VR-2: The presence of Plan components would create long-term visual contrast with surrounding undeveloped land and result in long-term diminished scenic quality</p> <ul style="list-style-type: none"> No mitigation is recommended; CMAs protect recreational resources to the extent feasible Cumulatively considerable impact for all alternatives 	X	X

* Note that the impacts found to be Less than Significant incorporate consideration of Conservation and Management Actions as well as recommended mitigation measures.

Summary of Significant and Unavoidable Impacts

The following paragraphs describe the significant impacts that would result from implementation of one or more of the alternatives evaluated in this EIR/EIS. Each discussion first identifies the alternative(s) that would create the significant impact, then describes the impact itself.

Meteorology and Climate Change: No Action Alternative

The No Action Alternative would conflict with California's established greenhouse gas reduction policy, set forth in Executive Order S-14-08. This policy calls for expediting renewable energy development in the desert, while facilitating the approval of renewable energy projects by providing assured conservation of desert resources. The No Action Alternative does not advance the greenhouse gas reduction policy because it would not expedite renewable energy development in the desert, facilitate approval of these projects, nor assure conservation of desert resources. This policy conflict is a significant impact.

All of the DRECP alternatives, including the No Action Alternative, would create a beneficial reduction in greenhouse gas emissions, because the renewable energy generated in the desert would result in a reduction in the use of fossil-fueled power plants in other regions. However, unlike the Preferred Alternative and Alternatives 1 through 4, the No Action Alternative would not include long-term regional natural resource conservation strategies to protect Covered Species, nor would it facilitate the development of renewable energy. Therefore, the No Action Alternative would create a significant and unavoidable impact based on this policy conflict.

Biological Resources: No Action Alternative

The Conservation and Management Actions and mitigation measures included for the Preferred Alternatives and Alternatives 1 through 4 would not apply to the No Action Alternative. In addition, in the No Action Alternative, the development of renewable energy in the desert would not be concentrated in disturbed lands. The result of the development and reduced habitat protection would be significant impacts to a number of biological resource values.

The mitigation typically imposed on individual renewable energy projects to offset impacts to biological resources does not provide regional benefits to Covered Species through a coordinated reserve design. As a result, the No Action Alternative would result in significant impacts to native vegetation and to state and federally protected plants and wildlife. Significant impacts would also result from lack of regional protection for habitat linkages and movement corridors, and habitat fragmentation could result, isolating populations of sensitive species. In addition, without the Plan, birds and bats would be at greater risk of injury or death from renewable energy project operation. Each of the DRECP action alternatives incorporates a reserve design concept, including Conservation and Management Actions, which would protect each of these resources, thus reducing the significant impacts that would occur in the No Action Alternative.

Cultural Resources – All Alternatives

In all six alternatives, the ground disturbance and visibility of renewable energy projects that would be required to generate up to 20,000 megawatts of power in the Plan Area would degrade known prehistoric, historic and tribal resources.

A set of comprehensive mitigation measures is presented to reduce the effects of development; however, even with these measures, impacts would remain significant. Historic and prehistoric resources existing within project development boundaries would be lost as a result of grading and construction activities. The size and visibility of large projects would result in degradation of the visual landscape, which reduces its ability to convey the historic and cultural significance of many valuable resource areas.

Native American Interests – All Alternatives

Partly because the desert is so rich in cultural resources, the region contains valued Native American elements that would be reduced in value if the development of up to 20,000 megawatts of renewable energy is pursued. Native American concerns include issues related to environmental review processes (environmental review, permitting and mitigation under NEPA and CEQA and the role of Native Americans in that process). In addition, physical impacts create Native American concerns (potential effects on traditional cultural properties and sacred sites, human remains, natural resources, landscapes, and spiritual values). Impacts related to tribal concerns are also found to be significant and unmitigable for all alternatives because natural and cultural elements of importance to Native Americans that exist within the Plan Area would be degraded as a result of direct disturbance like grading, and as a result of the presence of large and highly visible renewable energy projects.

Paleontological Resources – No Action Alternative

In the No Action Alternative, the development of renewable energy projects would proceed with uncertain and inconsistent protection for valuable paleontological resources. This inadequate protection would result in significant unmitigable impacts for the No Action Alternative only.

The Conservation and Management Actions and mitigation measures included for the Preferred Alternatives and Alternatives 1 through 4 would not apply to the No Action Alternative. The action alternatives would be developed with sufficient protection for paleontological resources, allowing renewable energy development to occur without significant impacts.

Mineral Resources – Preferred Alternative and Alternatives 1 through 4

The availability of lands for mineral resource development may be limited in two ways: first, by renewable energy development that eliminates or reduces access to known resources, and second, by conservation of mineral-rich lands, which would reduce access to mineral development. The reserve design associated with the Preferred Alternative and Alternatives 1 through 4 would create a significant and unmitigable

impact to mineral resource development because new policies under the DRECP would restrict development.

The potential loss of access for mineral extraction would be partly mitigated with implementation of recommended coordination between developers and mineral leaseholders. For the No Action Alternative, where mineral development access would be unchanged from current conditions, the impact would not be significant.

Agricultural Land and Production – All Alternatives

Development of renewable energy projects under the No Action Alternative or any of the other five alternatives could convert tens of thousands of acres of agricultural lands to renewable energy use. This potential conversion of large areas of Important Farmland to non-agricultural use would be a significant and unmitigable impact.

Under the action alternatives, additional Important Farmland could be converted to non-agricultural use to meet Biological Goals and Objectives as part of the DRECP Conservation Area system. Mitigation measures to preserve or reduce effects on agricultural resources, as well as Conservation and Management Actions for agriculture-dependent species and existing laws, would reduce impacts of renewable energy development on agricultural resources. However, the impacts would remain significant.

Outdoor Recreation – All Alternatives

For all of the action alternatives, the Conservation and Management Actions, DRECP Conservation Area, and LUPA would protect many acres of lands managed for recreation. Changes would avoid designated off-highway vehicle lands and designate over 3 million acres of Special Recreation Management Areas for all the action alternatives. Conservation and Management Actions require protection of recreational facilities, including prohibiting large-scale ground disturbing activities within one mile of high value and moderate value recreation facilities such as campgrounds, off-highway vehicle areas, and others. These Actions would enhance recreational opportunities in the Plan Area and reduce the severity of direct impacts to recreational facilities and areas managed for recreational purposes.

However, the development of large-scale renewable projects in Development Focus Areas would also impose dramatic visual changes to high value recreational areas. Over 40% of the Development Focus Areas for any of the action alternatives are within 5 miles of Legally and Legislatively Protected Areas, including national and state parks, and wilderness areas. The high visibility and industrial nature of the renewable energy projects would conflict with recreationists' expectations of pristine and expansive desert vistas and diminish the recreational experience from these areas, creating a significant and unmitigable impact.

Visual Resources – All Alternatives

The development of up to 20,000 megawatts of renewable energy projects in the desert would result in significant changes to the visual environment that are not mitigable.

Arid and semi-arid landscapes exhibit characteristic colors, textures, and landforms and, owing to the sparseness of vegetation, these areas offer dramatic vistas that are often undisturbed by development. The presence of these industrial facilities would change the desert viewed as a result of the amount of land disturbance, the characteristics of the projects, and the overall industrial character of these facilities. Specific measures can be taken to reduce the incongruity of renewable generation facilities with desert vistas, such as careful selection of colors and materials. However, the presence of these large-scale projects would still diminish the scenic quality of the desert.

IMPACTS TO BIOLOGICAL RESOURCES

As shown in Table 9, the development of renewable energy in the desert from the Preferred Alternative and Alternatives 1, 3 and 4 would result in impacts that are less than significant, primarily because of the DRECP Plan-Wide Conservation Strategy. The DRECP conservation strategy includes a DRECP Plan-Wide Reserve Design Envelope for each alternative, which coupled with the Monitoring and Adaptive Management Program and Plan Implementation, would provide for the conservation of species, natural communities and ecological processes throughout the Plan Area. Additionally, the DRECP Plan-Wide Conservation Strategy includes comprehensive Conservation and Management Actions designed to avoid, minimize, and compensate the impacts of renewable energy development on biological resources.

Alternative 2 would result in significant and unavoidable impacts to listed and sensitive plants and wildlife and habitat for listed and sensitive plant and wildlife including desert tortoise and Mohave ground squirrel. These impacts would be minimized through the implementation of avoidance and minimization Conservation and Management Actions and compensation Conservation and Management Actions established to offset the impacts of Covered Activities; however, under Alternative 2, the Development Focus Areas are sited in locations where development of Covered Activities adversely impact habitat linkage function and isolate populations and fragment habitat in the Plan Area for these species.

Alternative 2 would result in adverse impacts to habitat linkages and wildlife movement corridors. The Development Focus Areas in Alternative 2 are located in important linkage areas such that development of Covered Activities in these key location would have an adverse impact on wildlife movement. These impacts would be partially avoided and minimized through the implementation of the DRECP conservation strategy, including the reserve design and the Monitoring and Adaptive Management Program; however, Alternative 2 would result in impacts of habitat fragmentation and population isolation that cannot be entirely offset through these measures.

4.3 Comparison of Impacts of the Alternatives

This section provides an overview of the key differences in the types and degree of potential effects among the DRECP alternatives, including the No Action Alternative, by summarizing the major impacts and differences.

KEY FACTORS FOR COMPARING ALTERNATIVES

When comparing the environmental impacts of DRECP alternatives, the most important differences among alternatives are the following factors:

- The locations in which renewable energy development could occur
- The impacts to Covered Species and Critical Habitat
- The locations and types of conservation lands protected
- The alternative-specific Conservation and Management Actions that protect resources by defining specific avoidance areas, development and consultation processes, and other constraints
- The acreage and types of land allocations under the LUPA

These factors are used to compare the impacts of alternatives in the following paragraphs.

COMPARISON OF PREFERRED ALTERNATIVE WITH NO ACTION ALTERNATIVE

Development Locations. The No Action Alternative assumes the same amount of renewable energy development, about 20,000 megawatts, but this development would not be constrained to Development Focus Areas. The analysis assumes development could occur in any location that is not currently protected within ecoregion subareas where existing development already occurs. While the desert currently includes protected lands within parks, wilderness areas, and other land allocations, there are hundreds of thousands of acres of high value habitat for Covered Species available for development. As a result, projects would result in significant habitat loss and habitat fragmentation, affecting native vegetation and wildlife. The No Action Alternative, with few restrictions on development location, would retain as “developable” about 3.6 million acres of lands near Legally and Legislatively Protected Areas like National Parks, so the potential impacts of development from these protected lands would be widely distributed.

Under the Preferred Alternative, the Development Focus Areas are defined in locations having both renewable energy resources and reduced habitat value. As a result, development would have a greatly reduced potential to affect the desert’s most valuable habitat and movement corridors. Compared with the No Action Alternative, there are only one quarter of the number of acres of Development Focus Areas near protected lands, so desert vistas are much less likely to be disturbed from sensitive viewing areas.

Part of the goal of developing the Preferred Alternative, was to locate the Development Focus Areas on disturbed or degraded land. Because of this, the Preferred Alternative would likely affect more than twice as much valuable agricultural land as the No Action Alternative.

Impacts to Covered Species and Critical Habitat. Under the No Action Alternative, the impacts of renewable energy development would not be directed to low biological conflict areas as discussed above under Development Locations, and impacts to Covered Species, natural communities, and other environmental resources would not be addressed through a comprehensive regional conservation strategy, as described below under Conservation Lands.

Conservation Lands. If the No Action Alternative is selected, there will be no coordinated strategy to conserve valuable habitat. Each renewable energy project would have mitigation imposed for its own impacts, and each project would require individual assessment for take of Covered Species under the state and federal Endangered Species Acts. The absence of a strategy that defines regionally valuable conservation lands would mean that mitigation lands or compensation could be acquired without considering the broader Plan-Wide issues. In addition, the No Action Alternative would protect substantially fewer of the lands defined as having the highest value for Native American issues. Because the No Action Alternative would not designate conservation lands other than on a project-by-project basis, it would conserve access to and use of economic mineral resources within the DRECP.

The conservation lands defined for the Preferred Alternative would protect over twice the amount of important desert tortoise lands and nearly twice the lands with habitat linkages as compared to the No Action Alternative. The conservation lands that would be protected in the Preferred Alternative include four times as many lands containing Native American Elements, areas of high value to Native American tribes. Because the Preferred Alternative would designate conservation lands, it would result in impacts to economic mineral resources. Conservation land designated under the LUPA would remain available for access to economic mineral resources. Any access would be subject to area-specific management plans, including disturbance limits. Access to mineral resources on Conservation Priority Area acquired lands (nonfederal lands) would likely be restricted.

Conservation and Management Actions. The No Action Alternative would result in the adoption of project-specific mitigation measures, as adopted by each lead agency. Because lead agencies in the Plan Area could include BLM, CEC, CSLC, counties, cities, or the Department of Defense, there would not likely be consistency among measures or resource protection. The lack of consistency could result in reduced protection for some resources. For example, mitigation measures that protect paleontological resources have varied among lead agencies, and have provided uneven protection of resources on some approved renewable energy projects.

Under the Preferred Alternative, there are detailed Conservation and Management Actions that have been developed by BLM to protect a wide range of resources. These Conservation and Management Actions include

survey and monitoring requirements, development restrictions, and a wide range of other resource protection requirements. They apply to nearly all environmental resources, outlined above in Table 8.

LUPA Land Allocations. The No Action Alternative would not include any changes to BLM's land use plans or existing Multiple Use Classes designated in the California Desert Conservation Area Plan, as amended.

The Preferred Alternative includes a number of important changes to the California Desert Conservation Area Plan, resulting in greatly increased resource protection on BLM-administered public lands. For example, for the Preferred Alternative, there would be over 3.6 million acres of lands designated as recreation managed areas, compared with less than 2 million acres of lands managed for recreation emphasis but not officially designated as such for the No Action Alternative. In addition, for the Preferred Alternative, the LUPA establishes protection buffers of five miles on either side of National Historic Trails; in these areas, development would be prohibited to protect the historic viewshed.

COMPARISON OF ACTION ALTERNATIVES

The five alternatives that are evaluated in this EIR/EIS have varying amounts of development land and habitat protection, and the management constraints defined in the BLM LUPA and Conservation Management Actions vary. In addition, this EIR/EIS evaluates those alternative characteristics for 23 different environmental resources.

An example of the trade-offs posed by the alternatives is the potential for development of agricultural lands. The use of agricultural land for solar energy projects is attractive to developers because it provides disturbed habitat with reduced biological mitigation requirements, it is generally flat, and accessible. But agricultural lands are highly valuable to local governments because they provide more long-term employment opportunities and increased property tax revenues.

Key differences among the alternatives are highlighted through the points below.

Preferred Alternative

- Best minimize impacts to cultural resources and Native American interests, based on the location and extent of its conservation lands
- Have the least area of Mohave ground squirrel important areas within Development Focus Areas
- Have the most intense development in Imperial County on agricultural lands (along with Alternative 2)
- Designate the most new recreation lands within the BLM LUPA
- Allow development within the smallest number of groundwater basins that are in overdraft or stressed condition (with Alternative 1)
- Have the smallest likelihood of affecting cultural resources within Development Focus Areas
- Allow development of the Pahrump Valley area

- Protect the largest area of lands with Native American Elements within conservation areas
- Have the least amount of highly erosive soils within Development Focus Areas

Alternative 1

- Best minimize development of the eastern Riverside County area (between Desert Center and Blythe), where sand transport corridors provide valuable habitat to the Mojave fringe-toed lizard
- Minimize development in the Western Mojave area where the valuable Mohave ground squirrel habitat is centered
- Have the least development affecting habitat linkages, desert tortoise important areas, and golden eagle territories
- Convert the largest area of Important Farmland to development
- Allow development within the smallest number of groundwater basins in overdraft or stressed condition (with Preferred Alternative)
- Have the greatest likelihood of affecting cultural resources within Development Focus Areas (with Alternative 2)
- Protect the smallest areas around National Historic Trails, with a 1/4-mile buffer on either side of trails
- Protect the smallest area of lands with Native American Elements within conservation areas
- Conserve the Owens Dry Lake and the West Mojave area along U.S. 395 north of Edwards Air Force Base
- Have the most impacts to agriculture on lands used by agricultural Covered Species

Alternative 2

- Convert the smallest area of Important Farmland to development
- Have the greatest area of Mohave ground squirrel important areas within Development Focus Areas
- Have the greatest amount of highly erosive soils within Development Focus Areas
- Allow development of the Silurian Valley, the Pahrump Valley area, Searles Dry Lake, and the area along U.S. 395 north of Edwards Air Force Base
- Have the greatest likelihood of affecting cultural resources within Development Focus Areas (with Alternative 1)
- Protect the largest areas around National Historic Trails, with a 10-mile buffer on either side of trails
- Allow development of the most land within Herd Management Areas for wild horses and burros
- Designate the least new recreation lands within the BLM LUPA

- Have the most development lands within 5 miles of Legislatively and Legally Protected Areas.

Alternative 3

- Greatly reduce development of the eastern Riverside County area (between Desert Center and Blythe), where sand transport corridors provide valuable habitat to Mojave fringe-toed lizards
- Affect the smallest area of Native American Elements within development areas
- Have the least development lands within 5 miles of Legislatively and Legally Protected Areas
- Conserve the Owens Dry Lake and the West Mojave area along U.S. 395 north of Edwards Air Force Base

Alternative 4

In Alternative 4, the BLM variance lands have not been additionally modified for the DRECP and appear as they do in the BLM Solar Programmatic EIS. This contrasts with other action alternatives where areas identified in the BLM Solar Programmatic EIS as variance lands are screened for the DRECP using BLM DRECP screening criteria.

Inclusion of variance lands as they appear in the BLM Solar Programmatic EIS in Alternative 4 may provide greater flexibility under this alternative with respect to siting for renewable energy development.

Inclusion of variance lands as they appear in the BLM Solar Programmatic EIS in Alternative 4 would provide less certainty regarding conservation and management of these lands for the benefit of biological resources than would occur under other action alternatives.

AGENCY PREFERRED AND ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that the alternative with the least overall impacts be defined, if this alternative is not the No Action Alternative. Based on the summaries presented above and the detailed analysis in the remainder of this EIR/EIS, the CEC has determined that the Environmentally Superior Alternative is the Preferred Alternative.

NEPA requires that lead agencies define the alternative preferred by the NEPA lead agency in the Final EIS, or in the Draft EIS. The BLM and the USFWS have determined that the Agency Preferred Alternative is the Preferred Alternative.

4.4 Areas of Controversy

As disclosed in this Draft EIR/EIS, the development of up to 20,000 megawatts of renewable energy in the California desert requires facilitation of permitting for Covered Species in the desert, in order to provide long-term benefits of greenhouse gas reduction. The alternatives evaluated in this Draft EIR/EIS have been developed to illustrate the trade-offs between development focused in different parts of the desert, and to show

the differences among various conservation strategies.

Other areas of controversy associated with the DRECP are:

- Potential use of agricultural lands for renewable energy
- Potential for significant effects on areas valued by Native American tribes and potential loss of cultural resources
- Inclusion of adequate acreage of development lands with renewable resources, to ensure that developers have adequate opportunity to develop and receive DRECP permitting benefits
- Potential effects on groundwater basins due to requirements for water use during construction and operation of renewable energy facilities
- Location and amount of land to be conserved or protected, and location of these lands on public lands versus private lands under local jurisdiction
- Balancing development of renewable resources with significant impacts on desert vistas
- Adequacy of mitigation requirements for potential effects of renewable energy projects on birds and bats
- Alternative methods of achieving state and federal climate change goals including the role of distributed energy.

4.5 Issues to be Resolved

The issues that remain to be resolved will be defined based on comments on the Draft EIR/EIS. The comments will be reviewed by the lead agencies, and they will inform a series of decisions to be made before publication of the Final EIR/EIS. The lead agencies will consider whether the five action alternatives are adequate or whether they require modification, and they will consider whether mitigation presented in the Draft EIR/EIS needs to be modified. The lead agencies will also reconsider the identification of the Agency Preferred Alternative (under NEPA) and the Environmentally Superior Alternative (under CEQA) based on comments and any revisions to the EIR/EIS analysis.

4.6 Preliminary Conclusions

An element of the evaluation of the Draft DRECP during the public review process is consideration of the proposed action and alternatives in the context of the overall DRECP planning goals and agency-specific goals for the LUPA, GCP, and NCCP. The analysis in the Draft DRECP, as summarized in Section 4.3, suggests the Preferred Alternative will be most effective at achieving the DRECP goals of conserving the unique desert landscape, minimizing and mitigating the effects of incidental take of Covered Species, streamlining renewable energy production, and meeting other DRECP Planning Goals.



PART FIVE

PUBLIC PARTICIPATION AND OUTREACH



Public participation in the DRECP process has been extensive to date, and will continue to play a key role in the REAT agencies' decision-making. DRECP public outreach began in early 2009 and to date has included more than 40 publicly noticed meetings, producing many comments considered in preparation of the Draft DRECP. The release of the Draft DRECP and EIR/EIS and related environmental documents initiates the next public involvement phases: a comment period and workshops.

Numerous public meetings were held in order to explain the DRECP process and obtain public input. The meetings began in March 2009, then continued through 2012. A series of public field visits was held to supplement the public meetings and meetings of the Independent Science Advisors and Panel. In December 2012, the *Description and Comparative Evaluation of Draft DRECP Alternatives* was released to the public to provide stakeholders and the public to review and provide feedback on what was developed up until that time.

In July 2011, the CEC filed a CEQA Notice of Preparation for the DRECP with a 45-day public comment period. Also in 2011, the BLM and the USFWS published a joint NEPA Notice of Intent, following on the BLM's original Notice of Intent from November 2009.

In August of 2011, the REAT agencies held Public Scoping Meetings on the DRECP's EIR/EIS preparation process in Ontario and Sacramento.

Consultation with Native American tribal governments began in 2011 and is being carried out under multiple state and federal authorities. To date, agencies have hosted seven Tribal-Federal Leadership Conferences and various other face-to-face meetings that have shaped the development of the DRECP and will continue throughout the DRECP process and implementation.

Public Comments on the Draft DRECP and EIR/EIS

There will be a 90-day public review period for the Draft EIR/EIS, as defined in the Notice of Availability accompanying this document. Following the release of the Draft EIR/EIS, the REAT agencies will hold a series of public meetings and workshops. The intent of these meetings is to help public and agency stakeholders understand the Draft DRECP and EIR/EIS, and to facilitate public and agency input on the DRECP.

The dates, times, and locations of meetings and workshops will be posted on the DRECP website at <http://drecp.org>. Information on submitting comments may also be found at this same website. The REAT agencies will collect written comments by electronic and regular mail.

When submitting comments via electronic mail, please include your name or organization's name in the file name in either Microsoft Word format or as a Portable Document Format (PDF). To file written comments, please deliver or send them to the following addresses:

EMAIL ADDRESS:

docket@energy.ca.gov

U.S. MAIL OR HAND DELIVERY ADDRESS:

**California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512**

Please include "DRECP NEPA/CEQA" in the subject line or first paragraph of your comments. When submitting comments on the Draft DRECP and EIR/EIS, please include the name and means of contact for a person who would be available for later consultation if necessary. Please note that public comments and information submitted will be available for public review and disclosure at <http://drecp.org>. Before including your address, phone number, email address, or other personal identifying information in your comment, be aware that any information submitted as part of your comment will become part of the public record. Additionally, this information may become available via Google, Yahoo, and any other internet search engines. You may choose to withhold contact information, but the agencies will not be able to consult with you in the event clarification of your comment is needed. While you may request in your comment to withhold your personal identifying information from public review, agencies cannot guarantee the ability to do so.

All comments are due or must be postmarked on or before the closing day of the comment period.

DOCUMENT AVAILABILITY

The document is available at <http://drecp.org>, local area libraries, and on DVD upon request. To request a DVD, please send an email request to [drecp.info@energy.ca.gov] or call (916) 654-4818 with the mailing address. For a list of local area libraries that received the document on DVD, please go to <http://drecp.org>.



PART SIX
DOCUMENT ORGANIZATION



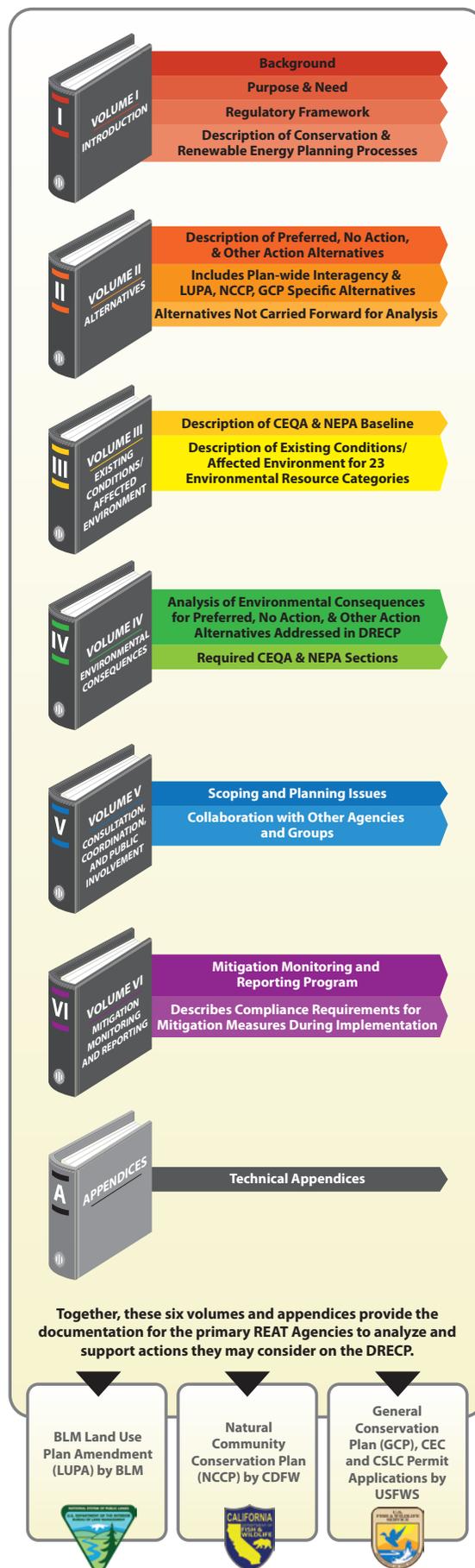
The Draft DRECP and EIR/EIS comprises six volumes (plus appendices). Table 10 indicates where to find details on each component in the document.

Table 10. Contents of Draft DRECP and EIR/EIS

Main Text	
Volume Number	Contents
Volume I	Introduction, Objectives, Legal Framework, Planning Process
Volume II	Approach to Developing Alternatives, Descriptions of All Alternatives Analyzed, Alternatives Eliminated
Volume III	Environmental Setting / Affected Environment
Volume IV	Impact Assessment
Volume V	Consultation, Coordination, and Public Involvement
Volume VI	Mitigation Monitoring and Reporting
Appendices	

- A. Desert Renewable Energy Conservation Plan Stakeholders and Memoranda of Understanding Timeline
 - A1. Desert Renewable Energy Conservation Plan Stakeholders
 - A2. Timeline of Memoranda of Understanding (MOUs) and Agreements Related to the DRECP
- B. Selection of DRECP Proposed Covered Species: Process and Methods
- C. Biological Goals and Objectives
- D. Reserve Design Development Process and Methods
- E. Summary of Responses to Independent Science Reviews
- F. Megawatt Distribution
 - F1. Methods for Megawatt Distribution
 - F2. Megawatt Hours and Solar Technology Distribution
 - F3. DRECP Acreage Calculator
- G. Supplemental Alternatives Maps
- H. Conservation and Management Actions Documentation
- I. Cost and Funding
- J. Department of Defense Materials
 - J1. California Compatible Initiative
 - J2. DOD Conflict Maps
- K. Transmission Technical Group Report
- L. Bureau of Land Management Worksheets
- M. U.S. Fish and Wildlife Service General Conservation Plan
- N. California Department of Fish and Wildlife Natural Community Conservation Plan
 - N1. Natural Community Conservation Plan
 - N2. Proportionality Estimates
- O. Existing Renewable Energy Projects Within DRECP Plan Area
- P. Climate Change
- Q. Baseline Biology Report
- R. Data Supporting Volumes III and IV
- S. Approach to Assigning Plan-Wide Conservation Assumptions in the Reserve
- T. Scoping Report: Desert Renewable Energy Conservation Plan Environmental Impact Report / Environmental Impact Statement
- U. List of Preparers
- V. Summary of Government-to-Government Tribal Consultation
- W. Solar PEIS Design Features
- X. Proposed National Monument and Catellus Agreement Lands Supplemental Information

Exhibit 14. Structure of the Draft DRECP and EIR/EIS





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