Appendix L

MITIGATION MONITORING AND REPORTING PROGRAM

L.1 MITIGATION MONITORING AND REPORTING TABLE

Aesthetics	
APPLICANT-PROPOSED MEASURE	**VIS-1**: **Weathering Coating of Security Fencing.** To reduce operational visual impacts of the Project to the community of Lake Tamarisk, the Project owner will apply a weathering coating (Natina or substantially similar) to the Project security fencing located closest to the community. The coating would reduce reflectance, which would be visually distracting, and the earth-tone color of the coating would reduce the industrial character of the fencing and help it to blend more effectively with the surrounding landscape. The total length of fencing that will be coated is approximately one mile and may be contiguous or in separate sections, depending on the final Project design and the location(s) of most visible security fencing.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	During Construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM AES-1**: **Surface Treatment of Project Structures and Buildings.** The Project owner shall treat the surfaces of all non-temporary, large Project structures and buildings (e.g., O&M building, substation components, inverters, electrical enclosures, gen-tie poles and conductors) visible to the public such that: (a) their colors minimize visual intrusion and contrast by blending with (matching) the existing characteristic landscape colors; (b) their colors and finishes do not create excessive glare from surface brightness; and (c) their colors and finishes are consistent with local policies and ordinances. The transmission line conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. Following a consultation with Riverside County and BLM visual resources specialists, and other representatives as deemed necessary, the Project owner shall submit for the County's and BLM's review, a specific Surface Treatment Plan that will satisfy these requirements. The consultation shall be in-field at the agencies' election, or as a desktop review if preferred by the agencies. The treatment plan shall include: (a) A description of the overall rationale for the proposed surface treatment, including the selection of the proposed color(s) and finishes based on the characteristic landscape. Colors shall be field tested using the actual distances from the KOPs to the proposed structures, using the proposed colors painted on representative surfaces; (b) A list of each major Project structure and building, the transmission line towers and/or poles, and fencing, specifying the color(s) and finish proposed for each. Colors must be identified by vendor, name, and pantone number, or according to a universal designation system; (c) One set of color brochures or color chips showing each proposed color and finish; (d) A specific schedule for completion of the treatment; and (e) A procedure to ensure proper treatment maintenance for the life of the Project. The Project owner shall not specify to the vendors the treatment of any buildings or structures treated during manufacture or perform the final treatment on any buildings or structures treated in the field until the Project owner receives notification of approval of the treatment plan by Riverside County and the BLM. Subsequent modifications to the treatment plan are prohibited without the County's and BLM's

Aesthetics	
	approval for components under their respective authorities; however, the Project owner may consider the agencies' failure to respond to a request for review within 60 days an acceptance of the proposal.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to Construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM AES-2: Project Design.** The Project owner shall use proper design fundamentals to reduce the visual contrast to the characteristic landscape. These include proper siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. Design strategies to address these fundamentals shall be based on the following factors: (a) *Vegetation Manipulation*: Retain as much of the existing vegetation as possible including along roadsides to intercept sightlines from public vantage points. Use existing vegetation to screen the development from public viewing and lessen the visibility of structural contrast and glare. Use scalloped, irregular, cleared edges to reduce line contrast. Use irregular clearing shapes to reduce form contrast. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes. (b) *Structures*: Minimize the number of structures and combine different activities in one structure. Use natural, self-weathering materials and chemical treatments on surfaces to reduce color contrast and the potential for reflectance (glare). Bury all or part of structures to the extent practical. Use natural-appearing forms to complement the characteristic landscape. Screen the structure from view by using natural landforms and vegetation. Reduce the line contrast created by straight edges. (c) *Linear Alignments*: Use existing topography to hide induced changes associated with roads, lines, and other linear features. Select alignments that follow landscape contours. Avoid fall-line cuts. Hug vegetation lines. (d) *Reclamation and Restoration*: Reduce the amount of disturbed area and blend the disturbed areas into the characteristic landscape. Where feasible, replace soil, brush, rocks, and natural debris over disturbed area. Newly introduced plant species should be of a form, color, and texture that blends with the landscape.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to and During Construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM AES-3**: **Night Lighting Management.** To the extent feasible, consistent with safety and security considerations, the Project owner shall design and install all permanent exterior lighting and all temporary construction lighting such that: (a) lamps and reflectors are not visible from beyond the Project site, including any off-site security buffer areas; (b) lighting does not cause excessive reflected glare; (c) direct lighting does not illuminate the nighttime sky, except for required FAA aircraft safety lighting; (d) illumination of the Project and its immediate area is minimized; and (e) it complies with local policies and ordinances.

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The Project owner shall also consult with the NPS Night Sky Program Manager in the development of the night lighting and comply with stricter standards for light intensity. All permanent light sources shall be below 3,500 Kelvin color temperature (warm white) and shall have cutoff angles not to exceed 45 degrees of nadir. The use of LED lighting with a Correlated Color Temperature (CCT) above 2,700 would introduce blue light into the environment that would have negative impacts on the night skies, wildlife, and visitors, and increase light pollution in that area. If LED light bulbs are used, they shall have a CCT of 2,700 or less. All lights, temporary and permanent, are to be fully shielded such that the emission of light above the horizontal is prevented. Prior to construction, the Project owner shall submit to BLM, Riverside County, and NPS JTNP for review a Night Lighting Management Plan that shall include the following:

(a) Location and direction of light fixtures that take the lighting mitigation requirements into account;

(b) Lighting that incorporates fixture hoods/shielding, with light directed downward or toward the area to be illuminated;

(c) Light fixtures, which are visible from beyond the Project boundary, that have cutoff angles that are sufficient to prevent lamps and reflectors from being visible beyond the Project boundary, except where necessary for security;

(d) All lighting that is of minimum necessary brightness consistent with operational safety and security;

(e) Lights in high illumination areas not occupied on a continuous basis (such as maintenance platforms) that have (in addition to hoods) switches, timer switches, or motion detectors so that the lights operate only when the area is occupied;

(f) Specification that LPS or amber LED lighting shall be emphasized, and that white lighting (metal halide) would: (a) only be used when necessitated by specific work tasks; (b) not be used for dusk-to-dawn lighting; and (c) would be less than 3500 Kelvin color temperature;

(g) Specifications and mapping for of all lamp locations, orientations, and intensities, including security, roadway, and task lighting;

(h) Specifications for each light fixture and each light shield;

(i) Total estimated outdoor lighting footprint expressed as lumens or lumens per acre;

(j) Specifications on the use of portable truck-mounted lighting;

(k) Specifications for motion sensors and other controls to be used, especially for security lighting;

(l) Surface treatment specifications that shall be employed to minimize glare and skyglow;

(m) Documentation that the necessary coordination with the NPS Night Sky Program Manager has occurred; and

(n) Exterior lighting that complies with current Title 24 regulations from the State of California and that shall be coordinated with the California Department of Transportation (Caltrans) to comply with exterior lighting regulations along I-10 and SR-177.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County, BLM, and NPS JTNP (review party)
Monitoring Phase/Timing:	Prior to Construction
Verification Approval Party:	Riverside County and BLM

Air Quality	
MITIGATION MEASURE	**MM AQ-1: Fugitive Dust Control Plan.** The Project owner, its contractor, or its subcontractor shall prepare and implement a Fugitive Dust Control Plan to address fugitive dust emissions during Project construction, operation, maintenance, and decommissioning. The plan shall include measures to minimize fugitive dust emissions from the commencement of construction activities through operations, maintenance, and decommissioning. In the case where the contractor obtains permit coverage under SCAQMD Rule 403, that permit and associated plan will be incorporated into the final Fugitive Dust Control Plan prepared by the Project owner. During construction, the Project owner, its contractor, and subcontractors shall take every reasonable precaution to prevent all airborne fugitive dust plumes from leaving the Project site, to prevent visible particulate matter from being deposited upon public roadways, and shall adhere to the SCAQMD rules. The plan shall be subject to review and approval by the SCAQMD (Rule 403). The following measures shall be included within the plan: ■ Prior to commencing construction, the Project owner, its contractor, or its subcontractor shall designate and retain for the duration of construction a Dust Control Supervisor. The Dust Control Supervisor shall have successfully completed the SCAQMD Rule 403 dust control compliance training class. The Dust Control Supervisor shall have full access to all areas of construction on the Project site, gen-tie line, and other linear facilities and shall have the authority to stop any or all construction activities as warranted by applicable construction mitigation conditions. ■ During construction, all unpaved roads, disturbed areas (e.g., areas of scraping, excavation, backfilling, grading, and compacting), and loose materials generated during construction activities shall be stabilized with a non-toxic soil stabilizer or soil weighting agent or watered two times daily or as frequently as necessary to minimize fugitive dust generation. Non-water-based soil stabilizers shall be as efficient as or more efficient for fugitive dust control than ARB-approved soil stabilizers and shall not increase any other environmental impacts, including loss of vegetation, adverse odors, or emissions of ozone precursor reactive organic gases (ROG) or volatile organic compounds (VOC). The proposed soil stabilizing products shall be listed in the Plan and are subject to review and approval by Riverside County, BLM, and CDFW. Any soil stabilizers proposed shall be consistent with those recommended in the Stormwater Pollution Prevention Plan (SWPPP) and shall also be approved for use by the project's Restoration Specialist to ensure that the products would not impede restoration goals. ■ The main access roads through the site shall be either paved or stabilized using soil binders, or equivalent methods, to provide a stabilized surface that is similar for the purposes of dust control to paving, that may or may not include a crushed rock (gravel or similar material with fines removed) top layer, prior to commencing construction. Delivery, laydown, and staging areas for construction or operations and maintenance supplies shall be paved or stabilized prior to taking initial deliveries. ■ Grading and earthwork activities, including vegetation removal, cut and fill movement, and soil compacting, shall be phased across the site to minimize the amount of exposed or disturbed area on any single day. ■ No vehicle shall exceed 15 miles per hour on unpaved areas within the site, with the exception that vehicles may travel up to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions or conflict with other permit conditions. ■ Visible speed limit signs shall be posted at the construction site entrances.

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	■ All construction equipment vehicle tires shall be inspected and washed as necessary to be cleaned free of dirt prior to entering paved roadways. ■ All unpaved exits from the construction site shall be graveled or treated to prevent track-out onto public roadways. No person shall allow track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation. All track out from an active operation shall be removed immediately if it extends over 25 feet or if under 25 feet, at the end of each workday. ■ All paved roads within the construction site shall be swept daily or as needed (less during periods of precipitation) on days when construction activity occurs to prevent the accumulation of dirt and debris. ■ At least the first 500 feet of any paved public roadway exiting the construction site or exiting other unpaved roads to access the construction site or staging areas shall be swept as needed when dirt or runoff resulting from the construction activities is visible on the paved public roadway. ■ Consistent with SCAQMD Rule 403(g)(2), regarding exemptions, contingency control measures may be implemented during "high wind" conditions, when instantaneous wind speeds exceed 25 miles per hour. The contingency measures for high wind events shall include: Cease all active operations; Stop all vehicular traffic; Apply water to soil not more than 15 minutes prior to moving such soil; Apply chemical stabilizers prior to wind event; and/or Apply water to all unstabilized disturbed areas 3 times per day, unless there is evidence of wind driven fugitive dust, then increase watering frequency to a minimum of four times per day.
Responsible Party:	Project Owner
Responsible Monitoring Party:	SCAQMD
Monitoring Phase/Timing:	Prior to and during construction
Verification Approval Party:	SCAQMD
MITIGATION MEASURE	**MM AQ-2: Control On-Site Off-Road Equipment Emissions.** The Project owner, when entering into construction contracts or when procuring off-road equipment or vehicles for on-site construction or O&M activities, shall ensure that only new model year equipment or vehicles are obtained. The following measures shall be included with contract or procurement specifications: ■ All construction diesel engines not registered under California Air Resources Board's Statewide Portable Equipment Registration Program, with a rating of 50 hp or higher shall meet the Tier 4 California Emission Standards for Off-Road Compression-Ignition Engines, as specified in California Code of Regulations, Title 13, section 2423(b)(1). ■ All diesel-fueled engines used in the construction of the facility shall have clearly visible tags showing that the engine meets the standards of this measure. ■ All equipment and trucks used in the construction or O&M of the facility shall be properly maintained and the engines tuned to the engine manufacturer's specifications. ■ All diesel heavy construction equipment shall not idle for more than five minutes. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to and during construction; during operations

Air Quality	
Verification Approval Party:	Riverside County and BLM
Biological Resources	
MITIGATION MEASURE	**MM BIO-1: Biological Monitoring**. Monitoring to ensure conformance with conditions of approval, including effective protection and avoidance of biological resources, shall be implemented by the Applicant as follows: ***Biological Monitoring Team*.** During construction and decommissioning, the Applicant shall employ a biological monitoring team to oversee Project activities. Any activity that may impact vegetation, wildlife, and sensitive resources shall be monitored to ensure compliance with all mitigation measures for biological resources. The biological monitoring team shall consist of: ■ *Lead Biologist:* The Applicant shall assign a Lead Biologist, approved by Riverside County, BLM, CDFW, and USFWS as the primary point of contact for the BLM and resource agencies regarding biological resources mitigation and compliance. The Lead Biologist shall have an approved MOU with Riverside County prior to commencing work on the Project. ■ *Biological Monitor:* Biological monitors shall be overseen by the Lead Biologist and shall perform any required surveys, ground disturbance and construction monitoring, wildlife monitoring, inspections, marking sensitive resource buffers, and revegetation monitoring during Project activities. Biological monitors shall include trained desert tortoise monitors (MM BIO-7) and nest monitors (MM BIO-8). ■ *Authorized Desert Tortoise Biologist:* For desert tortoise protection measures (MM BIO-7), the Applicant shall nominate a qualified individual to serve as Authorized Desert Tortoise Biologist, for approval by the USFWS and CDFW. The Applicant shall provide the resumes of the proposed Biological Monitoring Team to the BLM and Riverside County for approval prior to onset of ground-disturbing activities. The Biological Monitoring Team shall have demonstrated expertise with the biological resources within the Project region. The Biological Monitoring Team shall have authority to halt any activities in any area if it is determined that the activity, if continued, would cause an unauthorized adverse impact to biological resources. The duties of the Biological Monitoring Team shall vary during the construction, O&M, and decommissioning phases, based on the biological monitoring tasks needed for compliance during each phase. During O&M, an Applicant staff member serving as a compliance manager may perform the duties of the Lead Biologist to ensure compliance with biological mitigation measures, such as performing inspections for entrapped wildlife and fence condition, reporting dead or injured wildlife, avoiding nesting birds, and inspections of panel washing. The Applicant's compliance manager, if serving as Lead Biologist during O&M, shall have an approved MOU with Riverside County prior to commencing Lead Biologist duties on the Project. In general, the duties of the Lead Biologist shall include, but shall not be limited to: ■ Regular, direct communication with representatives of the BLM, and other agencies, as appropriate. The Lead Biologist, or during O&M, the Applicant's compliance manager, shall immediately notify the BLM and applicable resource agencies in writing of dead or injured special-status species, or of any non-compliance with biological mitigation measures or permit conditions. ■ Train and supervise Biological Monitors, including desert tortoise monitors, nest monitors, and construction monitors.

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	■ Conduct or oversee Worker Environmental Awareness Program (WEAP) training (MM BIO-2). ■ During construction and decommissioning, clearly mark and inspect sensitive biological resource areas in compliance with regulatory terms and conditions. ■ Oversee wildlife clearance surveys, ground disturbance and grading, and biological monitoring. Ensure that all biological monitoring is completed properly and on schedule. ■ Conduct or oversee bi-weekly compliance inspections during ground-disturbing activities and communicate any remedial actions needed (i.e., trash, fence, weed maintenance; wildlife mortality) to maintain compliance with mitigation measures. ***Reporting*.** The Lead Biologist, or during O&M, the Applicant's compliance manager, shall report regularly to the BLM and Riverside County to document the status of compliance with biological mitigation measures. During construction and decommissioning: ■ Provide weekly verbal or written updates to the BLM with any information pertinent to the BLM and Riverside County, to resource agencies, or to state or federal permits for biological resources. ■ Prepare and submit monthly and annual compliance reports to include a summary of Project activities that occurred, biological resources surveys and monitoring that were performed, any sensitive or noteworthy species observed, weed infestations removed, and non-compliance issues and remedial actions that were implemented. During O&M: ■ Conduct quarterly compliance inspections and reporting, to be submitted to the BLM and Riverside County, to document the condition of exclusion fencing, wildlife mortality, and any biological resource issues of note.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to and during construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM BIO-2: Worker Environmental Awareness Training.** The Lead Biologist shall prepare and implement a Worker Environmental Awareness Program (WEAP). The Applicant shall be responsible for ensuring that all workers at the site receive WEAP training prior to beginning work on the Project and receive annual refresher trainings throughout construction, operations, and decommissioning. The WEAP shall be available in English and Spanish. The Applicant shall submit the WEAP to the lead agency and resource agencies for approval prior to implementation. The WEAP will: ■ Be developed by or in consultation with the Lead Biologist and consist of an on-site or training center presentation with supporting written material and electronic media, including photographs of protected species, available to all participants. ■ Provide an explanation of the function of flagging that designates authorized work areas; specify the prohibition of soil disturbance or vehicle travel outside designated areas. ■ Discuss general safety protocols such as vehicle speed limits, hazardous substance spill prevention and containment measures, and fire prevention and protection measures.

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- Review mitigation and biological permit requirements.
- Explain the sensitivity of the vegetation and habitat within and adjacent to work areas, and proper identification of these resources.
- Discuss the federal and state Endangered Species Acts, Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act and the consequences of non-compliance with these acts.
- Discuss the locations and types of sensitive biological resources on the Project site and adjacent areas and explain the reasons for protecting these resources.
- Inform participants that no snakes, other reptiles, birds, bats, or any other wildlife shall be harmed or harassed.
- Place special emphasis on species that may occur on the Project site and/or gen-tie lines, including special-status plants, Crotch bumble bee, desert tortoise, burrowing owl, golden eagle, nesting birds, desert kit fox, American badger, and burro deer.
- Specify guidelines for avoiding rattlesnakes and reporting rattlesnake observations to ensure worker safety and avoid killing or injuring rattlesnakes. Rattlesnakes should be safely removed from the work area using appropriate snake handling equipment, including a secure storage container for transport, or by calling local animal control.
- Describe workers' responsibilities for avoiding the introduction of invasive weeds onto the Project site and surrounding areas, describe the Integrated Weed Management Plan.
- Provide contact information for the Lead Biologist and instructions for notification of any vehicle-wildlife collisions or dead or injured wildlife species encountered during Project-related activities.
- Include a training acknowledgment form to be signed by each worker indicating that they received training and shall abide by the guidelines.
- Desert Tortoise Education Requirements: Prior to the start of construction activities, a desert tortoise education program shall be presented by the Lead Biologist to all personnel who will be present on Project work areas. Following the start of construction, any new employee shall be required to complete the tortoise education program prior to working on site. At a minimum, the tortoise education program shall cover the following topics:
  - (a) A detailed description of the desert tortoise, including color photographs;
  - (b) The distribution and general behavior of the desert tortoise;
  - (c) Sensitivity of the species to human activities;
  - (d) The protection the desert tortoise receives under the state and federal Endangered Species Acts, including prohibitions and penalties incurred for violation;
  - (e) The protective measures being implemented to conserve the desert tortoise during construction activities;
  - (f) Procedures and a point of contact if a desert tortoise is observed on site.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County
Monitoring Phase/Timing:	Prior to beginning work on the project and throughout construction and operations
Verification Approval Party:	Riverside County and BLM

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MITIGATION MEASURE	**MM BIO-3: Minimization of Vegetation and Habitat Impacts.** Prior to ground-disturbing activities during construction, O&M, or decommissioning, authorized work areas shall be clearly delineated and sensitive resources that require avoidance would be flagged by the Lead Biologist. These areas shall include, but not be limited to, staging areas, access roads, and sites for temporary placement of construction materials and spoils. Delineation may be implemented with common orange vinyl "fencing" or staking to clearly identify the limits of work and will be verified by the Lead Biologist. No paint or permanent discoloring agents shall be applied to rocks or vegetation (to indicate surveyor construction activity limits or for any other purpose). Fencing/staking shall remain in place for the duration of construction. Spoils shall be stockpiled in disturbed areas. All disturbances, vehicles, and equipment shall be confined to the fenced/flagged areas. Construction activities shall minimize soil and vegetation disturbance and onsite construction/vehicle trips to minimize impacts to soil and root systems. Erosion control shall be implemented as described in the Drainage Erosion and Sedimentation Control Plan (DESCP) (MM HWQ-1), which requires identification of erosion treatments for exposed soil, such as chemical-based dust pallatives, soil bonding, and weighting agents suitable for use around vegetation. Additional BMPs, as committed to by the Applicant and incorporated into the Project Description, are described in Section 2.7 and include designation of primary travel routes, limiting grading to specific areas, building racking material in laydown areas to minimize use of roads, using equipment with smaller rubber-wheeled vehicles, maintaining hydrologic flow patterns, and preserving propagule islands to support vegetation recovery. Upon completion of construction activities in any given area, all unused materials, equipment, staking and flagging, and refuse shall be removed and properly disposed of, including wrapping material, cables, cords, wire, boxes, rope, broken equipment parts, twine, strapping, buckets, and metal or plastic containers. Any unused or leftover hazardous products shall be properly disposed of off-site in accordance with applicable legal requirements. Hazardous materials shall be handled in accordance with applicable legal requirements, and spills or leaks shall be promptly corrected and cleaned up according to applicable legal requirements. Vehicles shall be properly maintained to prevent spills or leaks. Hazardous materials, including motor oil, fuel, antifreeze, hydraulic fluid, grease, shall not be allowed to enter drainage channels. **Low-Impact Site Preparation and O&M.** Native vegetation shall be allowed to recover from rootstocks and seed bank wherever facilities do not require permanent vegetation removal (e.g., access roads, foundations, paved areas, or fire clearance requirements) within the perimeter fenceline of the solar facilities and under solar arrays. Project BMPs (Section 2.7.2) to minimize impacts during site preparation require that primary travel routes be designated through panel arrays to minimize disturbance between rows; that grading be limited to specific areas, including roads, substation, O&M facilities, laydown areas, some equipment pads, and in discrete areas within the arrays; and that small rubber-wheeled equipment be used. During O&M, vegetation height and density shall be managed as needed for fire safety and operation of the solar panels. Onsite vegetation that re-establishes under the solar panels will be periodically trimmed to a height no more than 12 inches, to avoid interference with the panels. Vegetation may require trimming approximately once every three years, as needed. Revegetation of native habitat and protection of erosive

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	soils shall be implemented in temporary impact areas, as described in MM BIO-4 and MM BIO-5. **Compensation for impacts to Desert Pavement.** Compensatory mitigation for impacts to desert pavement shall be identified prior to disturbance of the features at a minimum 1:1 ratio, in coordination with BLM and CDFW.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County
Monitoring Phase/Timing:	Prior to ground disturbance and during construction
Verification Approval Party:	Riverside County
MITIGATION MEASURE	**MM BIO-4: Integrated Weed Management Plan**. The Applicant shall prepare and implement an Integrated Weed Management Plan (IWMP) to minimize or prevent invasive weeds from infesting the site or spreading into surrounding habitat. The IWMP must comply with existing relevant BLM plans and permits including the Vegetation Treatments Using Herbicides (BLM, 2007) and Vegetation Treatment Using Aminopyralid, Fluroxypyr, and Rimsulfuron (BLM, 2016b), and must be approved by BLM and Riverside County (or its designated representative). Use of any pesticides would conform with licensing and application requirements from the California Department of Pesticide Regulation. Prior to herbicide use on BLM-administered lands, the BLM requires that a Pesticide Use Proposal (PUP) (BLM, 2019) be submitted to ensure that Projects follow herbicide use policies. If herbicides or pesticides will be used on BLM lands, the Applicant shall submit a Pesticide Use Proposal (PUP) form, to be approved by the BLM (also see Section 3.10.5 on hazardous materials). The PUP details which herbicides, pesticides, and associated adjuvants will be used for treatment, location of applications, responsible parties, timeline for treatment, application methods, application rates and maximum annual amounts, target species, and precautions for humans, sensitive resources, and non-target vegetation. Only a State of California and federally certified contractor will be permitted to perform herbicide applications. Only herbicides and adjuvants approved by the State of California and BLM for use on public lands will be used within or adjacent to the federal land segments of the Project. The Applicant shall submit the BLM approved PUP to Riverside County and implement the requirements of the PUP on private lands. The IWMP shall require that cover and density of non-native plants within temporarily disturbed areas will be no more than 25% of total cover, or no more than comparable adjacent undisturbed lands. Total cover on the Project site shall be calculated during the annual quantitative monitoring as required in the Vegetation Resources Management Plan (MM BIO-5), which shall complement the IWMP. Quantitative monitoring shall be performed using California Native Plant Society (CNPS) Combined Vegetation Rapid Assessment and Relevé Protocol (CNPS, 2022). Qualitative and quantitative vegetation monitoring will continue for a period of no less than three (3) years or until the defined success criteria are achieved (up to 5 years).

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PLAN REQUIREMENTS

Consistent with DRECP CMA LUPA-BIO-10 (Standard Practices for Weed Management), the Plan shall include:

- Plan objectives, including weed prevention, identification, and control via eradication, suppression, and containment;
- A list and discussion of weed species occurring or potentially occurring in the Project area, including Cal-IPC threat rankings;
- Role and responsibilities of a Weed Management Biologist, who will track, manage, and coordinate weed management activities;
- A discussion of methods to prevent introduction or spread of weeds, including worker training, vehicle cleaning and inspections, and use of weed-free seed, erosion control materials, and other construction material (gravel, sand, fencing);
- Requirements for annual monitoring of the Project site and 100-foot buffer in the early spring and late summer/early fall during construction, O&M, and decommissioning, and for 5 years after decommissioning;
- A description of monitoring methods to identify and map infestations;
- A description of manual and mechanical treatments that may be used to suppress, contain, or eradicate invasive weeds, such as use of hand or power tools, hand pulling, and soil solarization;
- A description of chemical treatments (herbicide) that may be used, including permitting and regulatory requirements for use, types of herbicides to be used such as pre-emergent, post-emergent, selective, and non-selective and the weeds they affect, application methods and rates, handling and cleanup procedures, and best practices to minimize impacts of herbicide use on wildlife and native vegetation, such as suspending treatments when winds are high or if precipitation is imminent, mixing herbicides over a drip pan at least 200 feet from open or flowing water, inspecting containers for leaks, and maintaining spill kits in vehicles and storage areas;
- A requirement for any herbicides used to meet the requirements of the BLM Vegetation Treatment guidelines (BLM, 2007; BLM, 2016b) and be implemented in accordance with the PUP (BLM, 2019);
- A description of reporting, to require management and monitoring reports during construction, O&M and decommissioning, and for 5 years after decommissioning;
- Annual reports shall include the location, species, extent, and density of weeds; a description of management efforts, dates, locations, types of treatment, and results; and a summary of preventative measures such as vehicle wash logs and facilities and success of measures.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to ground disturbance and during construction, operation, maintenance, and decommissioning
Verification Approval Party:	Riverside County, CDFW, and BLM
MITIGATION MEASURE	**MM BIO-5: Vegetation Resources Management Plan.** The Applicant shall prepare and implement a Vegetation Resources Management Plan (VRMP), to be reviewed and approved by USFWS, CDFW, BLM, and Riverside County (or its designated representative). The VRMP shall detail the methods to revegetate temporarily impacted sites and salvage

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special-status plants from the Project footprint; and outline long-term vegetation management within the solar facility during its operations. The Lead Biologist shall oversee implementation of the VRMP to meet success criteria and prevent further degradation of areas temporarily disturbed by Project activities.

The Plan shall require that total native vegetation cover will be no less than 80% of total vegetation cover on nearby undisturbed lands of comparable quality. Project sites previously disturbed by anthropogenic activities will be compared to nearby, similarly pre-disturbed sites.

As described below, total cover on the Project site shall be calculated during the annual quantitative monitoring as required in the VRMP, using California Native Plant Society (CNPS) Combined Vegetation Rapid Assessment and Relevé Protocol (CNPS, 2022).

Transplantation of cacti and ocotillo shall be considered successful with 75% survival after 3 years. If unsuccessful, remediation will be implemented to plant additional cacti at a 2:1 ratio.

PLAN REQUIREMENTS

Consistent with DRECP CMAs LUPA-BIO-7 (Restoration of Areas Disturbed by Construction Activities but Not Converted by Long-Term Disturbance), LUPA-BIO-VEG-1 (vegetation management for cactus, yucca, and other succulents under BLM policy), and LUPA-BIO-VEG-5 (adherence to BLM regulations and policies regarding salvage and transplants of cactus, yucca, other succulents, and BLM sensitive plants), the Plan shall include:

- *Revegetation of temporarily impacted sites.* The Plan shall specify methods to prevent or minimize further site degradation; stabilize soils; maximize the likelihood of vegetation recovery over time (for areas supporting native vegetation); and minimize soil erosion, dust generation, and weed invasions. The nature of revegetation will differ according to each site, its pre-disturbance condition, and the nature of the construction disturbance (e.g., drive and crush, vs. blading). Revegetation and monitoring will be performed in accordance with CNPS Combined Vegetation Rapid Assessment and Relevé Protocol (CNPS, 2022). Additional restoration guidance is provided in Abella and Berry 2016, and Abella et al. 2023, which describe techniques for restoring Mojave and western Sonoran habitats and desert tortoise habitat. New techniques, as available at the time of revegetation, will be integrated into vegetation management and adaptive management. The Plan shall include:
  - soil preparation measures, including locations of recontouring, decompacting, imprinting, or other treatments, as prescribed by the Lead Restoration Ecologist and consistent with CNPS Combined Vegetation Rapid Assessment and Relevé Protocol (CNPS, 2022);
    (a) details for topsoil storage, as applicable;
    (b) plant material collection and acquisition guidelines, including guidelines and methods for salvaging, storing, and handling seed and plants (including desert native species protected by the CDNPA and special-status plants) from the Project site, as well as obtaining replacement plants from outside the Project area (seed and plant palettes and materials shall be limited to locally occurring native species from local sources);
    (c) a plan drawing or schematic depicting the temporary disturbance areas (drawing of "typical" gen-tie structure sites will be appropriate);
    (d) time of year that the planting or seeding will occur and the methodology of the planting;

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(e) maintenance details, including vegetation treatments; a description of the irrigation, if used; erosion control measures; and non-native weed management per the IWMP;

(f) quantitative success criteria for regrowth of vegetation, requiring at least 80% native cover and no more than 20% non-native cover;

(g) a monitoring program to measure project compliance with the success criteria, including annual quantitative monitoring in accordance with CNPS Combined Vegetation Rapid Assessment and Relevé Protocol (CNPS, 2022);

(h) contingency measures for failed revegetation efforts not meeting success criteria, which may include, but is not limited to, reseeding, re-planting, erosion repairs, modifications to irrigation, and repair or remediation of sites;

(i) annual monitoring reports to be submitted to BLM and Riverside County (or its designated representative), providing a summary of the restoration and adaptive management activities for the previous year.

- *Cactus Salvage.* The Applicant shall include salvaged or nursery stock yuccas (all species), and cacti (excluding cholla species, genus Cylindropuntia) in revegetation plans. The Plan shall include:

(a) methods of salvage, including heavy equipment or hand tools, depending on plant size. For each plant, the microsite description will be recorded and the north-facing orientation will be identified and tagged.

(b) to the extent feasible, plants shall be salvaged during the fall or winter to minimize transplantation stress. If cacti must be salvaged during spring or summer, they shall be held over in a shade structure and protected from wind and heat until fall for transplantation. If cacti must be installed during spring or summer, shade structures or "vertical mulch" (branches cleared from the work sites) will be provided as shelter from sun and wind.

(c) guidelines for removing plants, such that plants are dug to avoid root damage. Roots shall be treated, as necessary, and plants shall be transported to avoid root damage.

(d) guidelines for storing plants, such that cacti and ocotillo shall be stored only when unavoidable. Plants shall be kept shaded and roots kept moist;

(e) specific replanting locations shall be identified within Project lands, such as revegetation areas on temporarily disturbed work sites, unless directed otherwise by BLM (for BLM land) or the County (for private land);

(f) methods for re-planting, ensuring that each salvaged plant shall be replanted in a microsite that resembles its salvage site and in the same north-facing orientation as the salvage site. Salvaged plants shall be covered deeply enough with soil to prevent root exposure and watered immediately after planting and at regular intervals thereafter based on needs of each species.

(g) quantitative success criteria for survival, requiring at least 75% survival after 3 years. If this criterion is not met, remediation shall be implemented to plant additional cacti at a 2:1 ratio or increase native vegetation cover and diversity at Project site.

(h) a monitoring program to measure Project compliance with the success criteria, including quarterly quantitative monitoring of survival status and identification of remedial actions needed, such as water, shade, or protection from wind, erosion,

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or wildlife. Results of monitoring shall be included in the annual monitoring report, as described above.

(i) seeds from special-status plants, if found, would be salvaged for re-vegetation. CRPR 1 or 2 species that are found shall be experimentally salvaged. No quantitative success criteria are assigned for experimental salvage; however, monitoring data shall be provided to the CDFW, Riverside County, and BLM to inform future mitigation for those species.

Operations Phase On-Site Vegetation Management. The Plan shall include mowing methods and scheduling for on-site vegetation management during O&M. The Plan shall describe vegetation treatments to be implemented to minimize interference with the solar panels, fire hazard, soil disturbance, and disturbance of any bird nests. Vegetation shall be inspected annually to identify hazardous vegetation or barren areas prone to erosion that require repair. All mowed or cut plant material that contains invasive weeds will be transported to a licensed solid waste or composting facility. Mowed or cut native plant material may be used on site as mulch. Weed control during O&M will be conducted as described in the IWMP (MM BIO-4).

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to ground disturbance and during construction and operation
Verification Approval Party:	Riverside County, CDFW, and BLM

MITIGATION MEASURE

MM BIO-6: Wildlife Protection. The Applicant shall undertake the following measures during construction and O&M to avoid or minimize impacts to wildlife. Implementation of all measures shall be subject to review and approval by BLM and Riverside County (or its designated representative).

- *Wildlife avoidance.* Project activities shall minimize interference with wildlife (including ground-dwelling species, birds, bats) by allowing animals to escape from a work site prior to disturbance; conducting pre-construction surveys and exclusion measures for certain species as specified in other measures; checking existing structures (homes, trailers, etc.) for animals such as bats, barn owls, skunks, or snakes that may be present, and safely excluding them prior to removing the structures.
- *Minimize traffic impacts.* The Applicant shall specify and enforce maximum vehicle speed limits as specified in the Traffic Control Plan, to minimize risk of wildlife collisions and fugitive dust.
- *Minimize lighting impacts.* Night lighting, when in use, shall be designed, installed, and maintained to prevent side casting of light towards surrounding fish or wildlife habitat.
- *Avoid use of toxic substances.* Soil bonding and weighting agents used for dust suppression on unpaved surfaces shall be non-toxic to wildlife and plants.
- *Minimize noise and vibration impacts.* The Applicant shall conform to noise requirements specified in the noise analysis of this EIR to minimize noise to off-site habitat.
- *Water.* Potable and non-potable water sources such as tanks, ponds, and pipes shall be covered or otherwise secured to prevent animals (including birds) from entering. Prevention methods may include storing water within closed tanks or covering open tanks with 2-centimeter netting. Dust abatement shall use the minimum amount of water on dirt roads and construction areas to meet safety and air quality standards. Water sources (e.g., hydrants, tanks, etc.) shall be checked periodically by biological monitors to ensure they do not create puddles.

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- *Trash.* All trash and food-related waste shall be contained in vehicles or covered trash containers inaccessible to ravens, coyotes, or other wildlife and removed from the site regularly.
- *Workers.* Workers shall not feed wildlife or bring pets to the Project site. Except for law enforcement personnel, no workers or visitors to the site shall bring firearms or weapons.
- *Wildlife exclusion.* The Applicant may install temporary or permanent exclusion fencing around equipment, work areas, or Project facilities to prevent wildlife exposure to hazards such as toxic materials or vehicle strikes. If fencing is not used, openings in stored equipment that would allow for entry of wildlife shall be secured with tape or other covering to prevent entrapment. The biological monitor shall perform inspections of equipment prior to use to ensure that no birds have nested on stored equipment and that no wildlife has become entrapped. The biological monitor will inspect exclusion fence (if installed) weekly.
- *Wildlife entrapment.* Project-related excavations, trenches, auger holes, and water tanks shall be secured or covered to prevent wildlife entry, entrapment, and drowning. Holes and trenches shall be backfilled, securely covered, or fenced. Open water tanks shall be covered or shall have other means of exit provided to prevent wildlife from drowning. Excavations that cannot be fully secured shall incorporate wildlife ramp or other means to allow trapped animals to escape. At the end of each workday, a biological monitor shall ensure that excavations and water tanks have been secured or provided with appropriate means for wildlife escape.
- *All pipes or other construction materials or supplies* shall be covered or capped in storage or laydown areas. Netting shall be installed over porta-potty vents. No pipes or tubing shall be left open either temporarily or permanently, except during use or installation. Any construction pipe, culvert, or other hollow materials shall be inspected for wildlife before it is moved, buried, or capped.
- *Dead or injured wildlife* shall be reported immediately to USFWS (for federally listed species and migratory birds) and CDFW (for all wildlife) and/or the local animal control agency, as appropriate, by the Lead Biologist (or the Applicant's compliance manager during O&M). Procedures for handling of dead or injured wildlife shall be outlined in a Wildlife Protection Plan, in coordination with CDFW. A Special Purpose Utility Permit (SPUT) would be acquired from the USFWS prior to collection of migratory bird carcasses. A biological monitor shall safely move the carcass out of the road or work area if needed and dispose of the animal as directed by the agency. If an animal is entrapped, a biological monitor shall free the animal if feasible, work with construction crews to free it in compliance with safety requirements, or work with animal control, USFWS, or CDFW to resolve the situation.
- *Pest control.* No anticoagulant rodenticides, such as Warfarin and related compounds (indandiones and hydroxycoumarins), may be used within the Project site, on off-site Project facilities and activities, or in support of any other Project activities.

Measures for Crotch bumble bee

- All on-site personnel shall be required to attend the Worker Environmental Awareness Training Program, as detailed in MM BIO-2, that includes education program on identification and avoidance of Crotch bumble bee and nests.

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- If a live individual is detected during pre-construction surveys, or incidentally, the Applicant shall take adaptive management actions in coordination with CDFW, considering CDFW guidance and best management practices at the time of the occurrence.
- Pre-construction surveys would include inspection for Crotch bumble bee nests. If any are located, CDFW would be notified and a no-disturbance buffer of at least 50 feet would be demarcated as determined by the Lead Biologist, in coordination with CDFW.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County, USFWS, CDFW, and BLM
Monitoring Phase/Timing:	During construction, operation, and maintenance
Verification Approval Party:	Riverside County, CDFW, and BLM

MITIGATION MEASURE

MM BIO-7: Desert Tortoise Protection. No desert tortoise may be handled or relocated without authorization from USFWS and CDFW. The Applicant shall obtain incidental take authorization from both agencies to address any potential take of desert tortoise, including authorization to handle or translocate desert tortoise. In addition to implementing the actions to be taken during construction, the Applicant shall prepare and implement a Desert Tortoise Protection Plan and a Raven Management Plan, with contents as defined herein.

REQUIRED ACTIONS TO PROTECT TORTOISE DURING CONSTRUCTION

The following shall be implemented:

- *Inspect for tortoises under vehicles*. The ground beneath vehicles parked outside of desert tortoise exclusion fencing will be inspected immediately prior to the vehicle being moved. If a tortoise is found beneath a vehicle, the vehicle will not be moved until the desert tortoise leaves of its own accord.
- *Protect tortoises on roads*. The Applicant shall specify and enforce maximum vehicle speed limits as specified in the Traffic Control Plan, to minimize risk of vehicle strikes. If a tortoise is observed on or near the road accessing a work area, vehicles will stop to allow the tortoise to move off the road on its own.
- *Tortoise Observations*. Any time a tortoise is observed within or near a work site, Project work activities will proceed only at the site and within a suitable buffer area after the tortoise has either moved away of its own accord, or if it has been trans-located off the site under authorization by the USFWS and CDFW. If a tortoise is observed outside of exclusion fencing, construction will stop, and the tortoise shall be allowed to move out of the area on its own. If a tortoise or tortoise burrow is observed within the exclusion fencing, construction in the vicinity will stop, pending translocation of the tortoise or other action as authorized by USFWS and CDFW.
- *Reporting of dead or injured specimens*. Upon locating a dead or injured tortoise, the Applicant or its agent will immediately notify the Palm Springs Fish and Wildlife Office by email or telephone. Written notification must be made within five days of the finding, both to the appropriate USFWS field office and to the USFWS's Division of Law Enforcement. The information provided must include the date and time of the finding or incident (if known), location of the carcass or injured animal, a photograph, cause of death, if known, and other pertinent information.
- *Tortoise compensatory mitigation*. Compensatory mitigation for desert tortoise shall include suitable habitat at a minimum of 1:1 ratio for impacts to desert tortoise

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suitable habitat and a ratio of 5:1 for impacts to desert tortoise critical habitat, in coordination with USFWS, CDFW, and in compliance with any ITPs.

PREPARE DESERT TORTOISE PROTECTION AND RELOCATION PLAN

To ensure safe handling and translocation in accordance with applicable wildlife agency guidance, desert tortoises shall be handled or translocated according to a Desert Tortoise Protection and Relocation Plan, to be reviewed and approved by USFWS, CDFW, BLM, and Riverside County.

The Desert Tortoise Protection and Relocation Plan shall be developed in accordance with and be consistent with the Desert Tortoise (Mojave Population) Field Manual (USFWS, 2009); Revised Recovery Plan for the Mojave Population of the Desert Tortoise (USFWS, 2011a); Translocation of Mojave Desert Tortoises from Project Sites: Plan Development Guidance (USFWS, 2020), and Health Assessment Procedures for the Mojave Desert Tortoise (USFWS, 2019b).

Relocated and translocated tortoises will be transmittered and monitored, as described below. All relocated or translocated desert tortoises will be monitored once within 24 hours of release; twice weekly for the first two weeks after release; weekly during the more-active season; biweekly during the less-active season; and for a duration agreed upon by Riverside County, BLM, USFWS, and CDFW from date of release.

PLAN REQUIREMENTS

Consistent with DRECP CMAs LUPA-BIO-COMP-1: (Compensation); LUPA-BIO-IFS-1: (Individual Focus Species [IFS]: Desert Tortoise [activities within desert tortoise linkages]); LUPA-BIO-IFS-2: (new roads in Tortoise Conservation Areas [TCAs]), LUPA-BIO-IFS-3: (culvert sizing for desert tortoise), LUPA-BIO-IFS-4: (desert tortoise exclusion fencing), LUPA-BIO-IFS-5: (desert tortoise monitoring for initial clearing and grading), LUPA-BIO-IFS-6: (desert tortoise monitoring during geotechnical boring), LUPA-BIO-IFS-7: (desert tortoise monitoring during geotechnical testing), LUPA-BIO-IFS-8: (inspections for desert tortoise under vehicles), LUPA-BIO-IFS-9: (speed limits in desert tortoise habitat), LUPA-VPL-BIO-IFS-1: (site activities in previously disturbed areas in desert tortoise linkages and TCAs), DFA-BIO-IFS-1: Individual Focus Species (IFS) (protocol surveys in desert tortoise habitat), DFA-BIO-IFS-2 (setback requirements), DFA-BIO-IFS-3: Desert Tortoise (desert tortoise translocation), the Desert Tortoise Protection and Relocation Plan shall include:

Authorized personnel titles and roles. The Applicant shall designate a USFWS Authorized Biologist to implement the desert tortoise protection measures. The Authorized Biologist may (or may not) also serve as the Project's Lead Biologist.

The Applicant shall employ one or more desert tortoise monitors who are qualified to conduct desert tortoise clearance surveys and who will be on site during all construction. The desert tortoise monitors' qualifications will be subject to review and approval by Riverside County and the BLM. Qualifications may include work as a compliance monitor on a project in desert tortoise habitat, work on desert tortoise trend plot or transect surveys, conducting surveys for desert tortoise, or other research or field work on desert tortoise. Attendance at a training course endorsed by the agencies (e.g., Desert Tortoise Council tortoise training workshop) is a supporting qualification.

The Authorized Biologist shall direct one or more desert tortoise monitors to conduct pre-construction clearance surveys for each work area, watch for tortoises wandering into the construction areas, check under vehicles, and examine excavations and other potential pitfalls for entrapped animals.

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The Authorized Biologist shall be responsible for overseeing compliance with desert tortoise protective measures and for coordination with resource agencies. The Authorized Biologist will have the authority to halt any Project activities that may risk take of a desert tortoise or that may be inconsistent with adopted mitigation measures or permit conditions. Neither the Authorized Biologist nor any other Project employee or contractor may bar or limit any communications between Riverside County, BLM, CDFW, or USFWS staff and any Project biologist, biological monitor, or contracted biologist. Upon notification by the desert tortoise monitor or another biological monitor of any noncompliance the Authorized Biologist shall ensure that appropriate corrective action is taken.

The following incidents will require immediate cessation of any Project activities that could harm a desert tortoise: (1) location of a desert tortoise within a work area; (2) imminent threat of injury or death to a desert tortoise; (3) unauthorized handling of a desert tortoise, regardless of intent; (4) operation of construction equipment or vehicles outside a Project area cleared of desert tortoise, except on designated roads; and (5) conducting any construction activity without a biological monitor where one is required.

***Worker training*.** Prior to the onset of construction activities, a desert tortoise education program will be presented by the Authorized Biologist to all personnel who will be present on Project work areas. Following the onset of construction, any new employee will be required to formally complete the tortoise education program prior to working on site. The following specifications will be incorporated into the WEAP training, identified in Mitigation Measure BIO-2. At a minimum, the tortoise education program will cover the following topics:

(a) A detailed description of the desert tortoise, including color photographs;

(b) The distribution and general behavior of the desert tortoise;

(c) Sensitivity of the species to human activities;

(d) The protection the desert tortoise receives under the state and federal Endangered Species Acts, including prohibitions and penalties incurred for violation;

(e) The protective measures being implemented to conserve the desert tortoise during construction activities; and

(f) Procedures and a point of contact if a desert tortoise is observed on site.

***Plan requirements for pre-construction and clearance surveys and use of exclusion fencing*.** Prior to the construction of solar facilities, temporary or permanent desert tortoise exclusion fencing will be installed around the entirety of the approved solar field and storage facility construction areas, as well as parking and laydown areas. Fenced areas would be surveyed and monitored to ensure desert tortoise are avoided.

Construction phase tortoise exclusion fencing. Exclusion fencing will adhere to USFWS design guidelines in the Desert Tortoise Field Manual (USFWS, 2009), where applicable. The exact location of different fencing types shall be determined in coordination with the USFWS. Permanent fencing shall be constructed with durable materials (i.e., 16 gauge or heavier) suitable to resist desert environments, alkaline and acidic soils, wind, and erosion. Temporary fencing would be built with the same materials, however it would not be trenched or buried but bent inwards flush with the ground surface.

Tortoise exclusion fencing shall include a “cattle guard” or desert tortoise exclusion gate at each entry point. This gate shall remain closed at all times, except when vehicles are entering or leaving. If it is deemed necessary to leave the gate open for extended periods of time (e.g., during high traffic periods), the gate may be left open as long as a biological monitor is present to monitor for tortoise activity in the vicinity.

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Preconstruction surveys. No more than 10 days prior to the initiation of fence construction, a pre-activity tortoise survey shall be conducted along the fence line installation area using techniques that provide 100% visual coverage of the disturbance area. Transects will be spaced 15 feet (5 meters) apart, and within an additional buffer area of 100 feet (30 meters) transects would be spaced 10 meters apart.

Fence monitoring. A biological monitor shall be present during all fence installation activities to inspect the work area and under vehicles for desert tortoise prior to ground disturbance or vehicle access to ensure that no tortoises have moved into the work area. If a desert tortoise moves into the work area, activities will halt until it moves out of the work site on its own accord or is moved from harm's way by an Authorized Biologist.

Fence inspections. Exclusion fencing will be inspected daily for the first two weeks following installation, to monitor for desert tortoise exhibiting fence-walking behavior. If none are observed, exclusion fencing will be inspected weekly during desert tortoise active seasons (April 1 to May 31 and September 1 to October 31), at least monthly during non-active seasons (June to September, November to March), and following all rain events, and corrective action taken if needed to maintain it.

Unfenced work areas. As an alternative to exclusion fencing, any work conducted in an area that is not fenced to exclude desert tortoises (e.g., gen-tie tower sites) must be monitored by a biological monitor who will stop work if a tortoise enters the work area. Work activities will proceed only at the site and within a suitable buffer area after the tortoise has either moved away of its own accord, or if it has been translocated off the site under authorization by the USFWS and CDFW. Work sites with potential hazards to desert tortoise (e.g., auger holes, steep-sided depressions) that are outside of the desert tortoise exclusion fencing will be fenced by installing exclusionary fencing, covered, or will not be left unfilled overnight.

Clearance surveys. An Authorized Biologist shall direct a clearance survey before the tortoise fence is enclosed to ensure no tortoises are in the work area. After exclusion fencing is fully installed, a desert tortoise pre-construction clearance survey shall be con-ducted within each of the enclosed, fenced areas. Per the USFWS Field Manual (2009), clearance surveys must consist of at least 2 consecutive surveys of the site. Clearance will be considered complete after two successive 100 percent coverage surveys have been conducted without finding any desert tortoises. If active desert tortoise sign is observed during the second survey pass, a third pass may be required after consultation with the agencies. Surveys will be led by Authorized Biologists experienced with searching for desert tortoise, potential burrows, scat, and carcasses. Surveys will consist of 100 percent visual coverage using pedestrian belt transects spaced at 5-meter intervals. An additional 500-foot (150 meter) buffer outside the Project boundary will also be surveyed with pedestrian belt transects spaced at 10 meters apart to identify any potentially active burrows that may be indirectly affected by construction activities.

Clearance surveys must be conducted during the active season for desert tortoises (April 1 through May 31 or September 1 through October 31), unless authorized by CDFW and USFWS.

During the first survey pass, all sign (scat, carcasses, tracks, etc.) shall be removed from the clearance area, which will prevent reidentification of the same tortoise sign in proposed work areas. Desert tortoise carcasses may be returned to USFWS or CDFW, used for educational purposes, or relocated in the natural environment outside the work area fence line, as coordinated with resource agencies.

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If a tortoise is located during clearance surveys, work activities will proceed only after the tortoise has either moved away of its own accord, or if it has been relocated or translocated off the site under authorization by the USFWS and CDFW. The buffer distance for work activities shall be 100 feet during the non-active season and at least 250 feet during the active season (September-October and April-May), unless otherwise directed in the CDFW Incidental Take Permit (ITP).

Any potentially occupied burrows will be avoided until monitoring or field observations (e.g., with a motion-activated camera or fiber-optic mounted video camera) determines absence. The fence shall be either continuously monitored prior to closure, or clearance surveys shall be repeated prior to closure after tortoises are removed.

Plan requirements for handling of desert tortoise. Only persons permitted by the USFWS and CDFW under the Desert Tortoise Activity Form (i.e., streamlined Section 7 consultation process) or Incidental Take Permit shall handle desert tortoises. All desert tortoises will be handled by an Authorized Biologist in accordance with the Desert Tortoise Field Manual (2009) and the USFWS Revised Translocation Guidance (2020). Authorized Biologists shall handle tortoises in accordance with approved disinfection and sanitation techniques and procedures defined by the Desert Tortoise Health Assessment Procedures (USFWS, 2019a).

Tortoises shall be handled according to seasonal and temperature constraints, where any handling of desert tortoises would always be below the temperature of 95°F. During handling, the desert tortoise will be kept in a shaded environment that does not exceed 95°F and will not be released until ambient air temperatures fall below 95°F.

Biologists will maintain a record of all desert tortoises identified and handled on the Project site, including photographs, time and location of handling, temperature, condition and measurements of the individual, transmitter information, and information on nests, eggs, and voiding of bladder. Should a tortoise void or defecate between capture and release, it shall be thoroughly rehydrated and rinsed to remove any odors that could attract potential predators. Any desert tortoise handling event shall be completed within 30 minutes or less (not including rehydrating a desert tortoise that has voided).

The Plan shall detail methods for attaching transmitters to desert tortoises that will be relocated, translocated, or monitored. The Applicant will consult with the USFWS Desert Tortoise Recovery Office to coordinate transmitter frequencies. Radio transmitters and antennae must be mounted by an Authorized Biologist so as not to impede growth or the daily activities of the tortoise.

The Plan shall detail nest and egg handling procedures. Any nest that is found will be carefully excavated by hand by an Authorized biologist. A nest will be prepared at the release site with the same depth and location in relation to the burrow entrance as the original nest. The eggs will be transferred to the new nest, maintaining their original orientation and replaced so that they touch one another. Eggs will be gently covered with soil from which cobbles and pebbles have been removed so that all the air spaces around the eggs are filled.

To the greatest extent practicable, bromating (hibernating) tortoises will not be relocated or translocated. If a bromating desert tortoise cannot be avoided by Project activities or be passively relocated, the tortoise may be captured and released in coordination with USFWS and CDFW.

***Procedures for relocation, passive exclusion, and translocation of desert tortoise and identification and description of translocation recipient sites*.**

Relocation. Desert tortoises less than 160 mm will be relocated as soon as possible after detection. Adult desert tortoises (more than 160 mm) identified for relocation will be transmittered and left in situ or within on-site pens following health assessments, data collection, and monitoring, until they can be transported. The Plan shall detail the construction of on-site pens, in accordance with USFWS guidance (USFWS, 2011). Relocation and monitoring of tortoises <100 mm will be coordinated with BLM, USFWS, and CDFW on a case-by-case basis at the time of detection. Desert tortoises will be relocated by an Authorized Biologist within 300 meters of their capture locations in suitable habitat, within adjacent BLM land or private land owned by the Applicant.

Passive exclusion. Passive exclusion shall be prioritized on all linear Project components and in unfenced work areas by using a biological monitor to accompany construction crews and equipment in the field. Construction or maintenance activities will cease if a desert tortoise is detected within the work area or if a tortoise is in imminent danger, until the tortoise moves a safe distance out of the work area. Desert tortoises would be relocated from unfenced work areas if a tortoise does not leave a work area and no other alternate work site is available for crews or an occupied burrow is located within or adjacent to a work area that cannot be avoided.

A Biological Monitor would monitor initial clearing and grading activities for any tortoises missed during the clearance survey. Excavations with steep walls shall have a wildlife escape ramp and be fully covered at the end of the workday to prevent entrapment. After vegetation is fully removed within fenced areas, weekly spot checks shall be conducted to ensure that there are no desert tortoises within the construction area for the duration of the construction phase.

Translocation. If a desert tortoise is found and is not in an area appropriate for relocation (i.e., suitable habitat does not occur within a 1.5-kilometer buffer surrounding the potential release point), the tortoise will be translocated. Translocations shall occur during the tortoise active season.

The Plan shall detail methods and procedures for translocation, including health assessments, transportation requirements, and identification of comparable release locations, in accordance with the Desert Tortoise Field Manual (USFWS, 2009). Per the USFWS Translocation Guidance (2020), a translocation review package, incorporating the penultimate health assessment in the month before the scheduled translocation, shall be submitted to Riverside County, BLM, USFWS, and CDFW for approval of the proposed disposition of each tortoise on the Project site.

Recipient sites shall be approved in consultation with BLM, USFWS, and CDFW, and shall be comprised of suitable desert tortoise habitat with modelled high desert tortoise occupancy (Nussear, 2009). The recipient site shall be sited within desert tortoise critical habitat, unless otherwise directed by the agencies.

Plan requirements for construction monitoring and reporting

Construction monitoring and reporting. During the construction phase, the Authorized Biologist shall prepare daily records of desert tortoise observations and site inspections. If at any time a desert tortoise is identified on the Project site, Riverside County, BLM, USFWS, and CDFW will immediately be notified.

Reporting for construction monitoring and implementation of the Plan shall be provided in weekly updates and monthly reporting to Riverside County, BLM and USFWS, as well as quarterly reporting to CDFW. Annual and final reports shall be submitted to Riverside County, BLM, USFWS, and CDFW, as required. Summaries of compliance tortoise surveys,

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relocation, translocation, and monitoring activities conducted during the previous calendar year will be included.

Translocation monitoring and reporting. Telemetry-based monitoring shall be implemented for at least six months to document short-term survival of small numbers of translocated tortoises. The Applicant will consult with Riverside County, BLM, USFWS, and CDFW to determine the appropriate monitoring duration and methodology. All relocated or translocated desert tortoises will be monitored once within 24 hours of release; twice weekly for the first two weeks after release; weekly during the more-active season; biweekly during the less-active season; and for a duration agreed upon by Riverside County, BLM, USFWS, and CDFW from date of release. Health assessments shall be performed twice-annually.

Reporting for translocation shall be provided in weekly updates and monthly reporting to Riverside County, BLM and USFWS, as well as quarterly reporting to CDFW. Annual and final reports will be submitted to Riverside County, BLM, USFWS, and CDFW. Summaries of all compliance tortoise translocation, and post-translocation, effectiveness, and health monitoring activities conducted during the previous calendar year will be included.

Plan requirements for O&M, decommissioning, and adaptive management

O&M. At the Applicant's discretion, and in consultation with resource agencies, permanent desert tortoise exclusion fencing may be installed around each solar facility site. If permanent desert tortoise exclusion fencing is not installed,

Tortoises observed by personnel within the fence line of the solar facility components during routine maintenance activities or along the main access road will be relocated or translocated by permitted biologists, in coordination with USFWS and CDFW. Relocated tortoises will be moved to suitable habitat within 300 meters of where it was found, outside of the fence line within adjacent BLM land or private land owned by the Applicant. Translocated tortoises will be moved to the approved recipient site.

For any routine maintenance or emergency/unexpected repairs that require surface disturbance or heavy equipment desert tortoise shall be allowed to move out of harm's way of its own accord, or the tortoise will be relocated by an Authorized Biologist.

In areas where wildlife-friendly fencing is implemented, temporary exclusion fencing may be removed only after vegetation is successfully re-established and habitat is suitable to support desert tortoise, in coordination with USFWS. If used, wildlife-friendly fencing will be installed around solar arrays in the Pinto Wash Linkage and areas adjacent to desert dry wash woodland that provide higher quality desert tortoise habitat. The security fence would leave a 6- to 8-inch gap between the lower fence margin (rail or mesh) and the ground and the bottom of the fence fabric (chain-link or similar material) would be wrapped upward so that no sharp edges are exposed along the lower fence margin. The fencing would be inspected at least once per quarter by a qualified biologist to identify areas of sand deposits at the fence line or damage to fencing. During the fall and spring quarter, inspections would be performed during active desert tortoise season.

Decommissioning. After decommissioning, fencing shall be removed. Desert tortoise conservation measures shall be in place and the decommissioning activities shall be monitored for the presence of desert tortoise and desert tortoise sign. Observations of desert tortoise shall be reported and protection measures shall be coordinated with USFWS and CDFW.

Adaptive management. Adaptive management measures would be implemented if there is evidence of Project-related disturbance to or increased risk to desert tortoise, and

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where initial protection methods have been deemed ineffective based on monitoring results. Remedial actions may include repairs or modifications to fencing, additional surveying, or additional monitoring and inspections. Adaptive management measures used shall be reported in the annual report.

PREPARE A RAVEN MANAGEMENT PLAN

The Applicant shall develop and implement a Raven Management Plan to address activities that may occur during the pre-construction, construction, decommissioning, and O&M phases of the Project that may attract common ravens (*Corvus corax*), a nuisance species that is a subsidized predator of desert tortoises and other sensitive species in the Project vicinity.

The Applicant will submit payment to the Project sub-account of the Renewable Energy Action Team (REAT) Account held by the National Fish and Wildlife Foundation (NFWF) to support the Service's Regional Raven Management Program. The one-time fee will be as described in the cost allocation methodology, or more current guidance as provided by the Service or CDFW. The contribution to the regional raven management plan will be $105 per acre impacted.

The Plan shall be prepared in accordance with USWFS guidelines in Management of Conflicts Associated with Common Ravens in the United States (USFWS, 2023). If raven monitoring indicates an increase in local raven activity attributed to the Project, measures shall be implemented to deter ravens from the site, such as additional worker education, more stringent restrictions on water use or trash disposal, installation of nest-prevention or roost-prevention devices on Project facilities, or specific measures to "haze" ravens from Project facilities or subsidies in coordination with USFWS and CDFW.

PLAN REQUIREMENTS

Consistent with DRECP CMA LUPA-BIO-6 (Subsidized Predators Standards), the Raven Management Plan will be developed and implemented to:

(a) Identify conditions associated with the Project that might provide raven subsidies or attractants, including water, anthropogenic food sources, roadkill for scavengers, trash, and perches.

(b) Describe management practices and control measures to avoid or minimize conditions and subsidies that might increase raven numbers and predatory activities, such as proper and regular disposal of food waste and trash using raven proof containers; removing road-killed animals; securing water thanks from leaks; using the minimum amount of water needed for dust control, panel washing, and irrigation; and use of BMPs for perching and roosting per current standards and practices, including APLIC guidelines (2006, 2012).

(c) Describe monitoring during construction and operations, including roles and responsibilities for monitoring biologists, monitoring requirements for food and water subsidies, monitoring requirements for raven presence and nesting, and methods to identify individual ravens that prey on desert tortoises.

(d) Describe reporting requirements for monitoring results, including annual monitoring reports to be submitted to USFWS, CDFW, BLM, and Riverside County.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County, USFWS, CDFW, and BLM
Monitoring Phase/Timing:	Prior to construction and during construction, operation, and maintenance
Verification Approval Party:	Riverside County, USFWS, CDFW, and BLM

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MITIGATION MEASURE	**MM BIO-8: Bird and Bat Conservation Strategy (BBCS).** Bird and bat fatality and injury monitoring is being performed at the neighboring Oberon, Arica, and Victory Pass Projects. The approved BBCS plans for these projects include mortality monitoring and sampling methods, sampling design, and survey and data collection protocols. The Applicant shall use the results of post-construction bird and bat monitoring at the Oberon, Arica, and Victory Pass Projects to inform actions to be taken at the Easley Project, focused on the development of adaptive management measures that would minimize impacts and mortality to avian and bat species. The Applicant shall prepare and implement a BBCS that acknowledges the ongoing monitoring at other projects. The BBCS shall be focused on the implementation of adaptive management measures that may be required depending on monitoring results at the other projects. Adaptive management measures shall be developed in consultation with USFWS based on the results of on-going monitoring and current standards and guidelines. Available guidelines include USFWS Considerations for Avian and Bat Protection Plans (USFWS, 2010). These measures would avoid and minimize take of birds and bats on the Project site that may be vulnerable to injury or mortality on the Project site and/or collision with Project components (IP Easley, 2023). The plan shall be crafted to meet the following standard: If impacts to avian species are documented at Oberon, Arica, Victory Pass, and Easley Projects and these impacts are shown to result in a substantial, long-term reduction in the demographic viability of the population of the species in question, then the Applicant would coordinate with USFWS and CDFW to determine if adaptive management, as described below, must be implemented to reduce Project related impacts. Over the course of construction and O&M, fatality thresholds and future conservation measures may be subject to revision in coordination with USFWS and CDFW as new information is obtained. **PLAN REQUIREMENTS** Consistent with DRECP CMAs LUPA-BIO-16 (Activity-Specific Bird and Bat CMAs) and LUPA-BIO-17 (Activity-Specific Bird and Bat CMAs BBCS), the Plan shall include: ■ A description of bird and bat species in the Project area; ■ A project-specific risk assessment that addresses potential for take, based on threats to birds and bats from the Project, including collision, electrocution, territory abandonment, nest and roost site disturbance, habitat loss and fragmentation, disturbance from human presence, and predator subsidies, in accordance with USFWS guidelines (USFWS, 2010); ■ A description of the ongoing monitoring occurring at the Oberon, Arica, and Victory Pass Projects and the findings of these programs as of the date of Plan preparation. ■ A description of the monitoring that will occur at the Project site. Monitoring efforts will be designed to ensure that birds and bats are identified and avoided on the Project site, and that Project related risks are managed to detect and avoid injury and mortality. ■ A description of how the adaptive management actions would be developed and a list of potential adaptive management measures that could be implemented if impacts to any avian species are shown to be occurring at Oberon, Arica, Easley, and Victory Pass and these impacts appear likely to result in a substantial, long-term reduction in the demographic viability of the population of the species in question. Adaptive management measures may include passive avian diverter installations, the use of sound, light or other means to discourage site use consistent with legal requirements, on site

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habitat management or control measures consistent with applicable legal requirements, or modification to support structures to exclude nesting birds.

- A requirement that adaptive management measures be implemented until monitoring data indicates that mortality has not increased due to operation of the Project; and that there is not a substantial reduction in demographic viability for the species in question.

BIRD AND BAT COMPENSATION FEE

Consistent with CMA LUPA-BIO-COMP-2 and in coordination with BLM, compensation for mortality impacts to bird and bat focus and special-status species shall be determined based on bird and bat mortality monitoring at the Project and a fee reassessed every five years to fund compensatory mitigation. The fee is calculated based on bird-use and estimated mortality from the Project, per a Resource Equivalency Analysis as directed in CMA LUPA-BIO-COMP-2.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County, CDFW, BLM, and USFWS
Monitoring Phase/Timing:	Prior to construction and during construction, operation, and maintenance
Verification Approval Party:	Riverside County, CDFW, and BLM

MITIGATION MEASURE

MM BIO-9: Nesting Bird Management Plan (NBMP). The Applicant shall prepare and implement a Nesting Bird Management Plan (NBMP) that will provide a framework for surveying, management, and monitoring of bird nesting activities during the construction phase. The NBMP shall be prepared in conjunction with the BBCS.

The Project will either avoid vegetation clearing during the nesting season or conduct pre-construction nest surveys of potential habitat and implement no-disturbance buffer areas around active nests.

The plan shall ensure that impacts to nesting birds are avoided and minimized through establishment of adequate buffers around active nests, as determined by a qualified biological monitor. Nest surveys shall be conducted for all Project activities throughout the nesting season, (beginning January 1 for raptors and hummingbirds and February 1 for other species, and continuing through August). Nest buffers shall be species-specific, ranging from 100 feet for small passerines to 500 feet for raptors, as defined by the California Public Utilities Commission Nesting Bird Working Group (2015).

Default Buffers for Nests During Construction

Avian Group (nest type/location)	Species Potentially Nesting within Easley Solar Project Site	Minimum Buffers for Ground Construction per Disturbance Level (feet)*
Waterfowl and rails	Canada goose, wood duck, mallard, cinnamon teal, ruddy duck, Virginia rail, sora, American coot, pied-billed grebe	150
Quail	California quail, Gambel's quail	150
Herons	Great blue heron, great egret, snowy egret, cattle egret, black-crowned night-heron	250
Birds of prey (Category 1)	American kestrel, barn owl, western screech-owl	300
Birds of prey[2] (Category 2)	Cooper's hawk, red-tailed hawk, red-shouldered hawk, great horned owl	300

Biological Resources		
Birds of prey (Category 3)	Turkey vulture, red-tailed hawk, white-tailed kite, northern harrier, long-eared owl	500
Shorebirds	Killdeer	200
Pigeons	Band-tailed pigeon	150
Doves	Mourning dove, white-winged dove, common ground-dove	150
Roadrunners	Greater roadrunner	300
Nightjars	Lesser nighthawk, common poorwill	150
Swifts	White-throated swift	200
Hummingbirds	Anna's hummingbird, Costa's hummingbird	100
Woodpeckers	Acorn woodpecker, ladder-backed woodpecker, Nuttall's woodpecker, downy woodpecker, northern flicker	150
Passerines (bridge, culvert, and building nesters)	Black phoebe, Say's phoebe, Ash-throated flycatcher, northern rough-winged swallow, cliff swallow, barn swallow, house finch (3)	100
Passerines (ground nesters, open habitats)	Horned lark, rock wren, western meadowlark, orange-crowned warbler, lark sparrow, grasshopper sparrow	150
Passerines (understory and thicket nesters)	Bushtit, Bewick's wren, blue-gray gnatcatcher (2), black-throated gray warbler, yellow-breasted chat, spotted towhee, black-chinned sparrow, sage sparrow, song sparrow, black-headed grosbeak, blue grosbeak, lazuli bunting, American goldfinch	150
Passerines (shrub and tree nesters)	Pacific-slope flycatcher, Cassin's kingbird, western kingbird (2), loggerhead shrike (2)*, Hutton's vireo, western scrub-jay, American crow, common raven, verdin, bushtit, black-tailed gnatcatcher, blue-gray gnatcatcher (2), cactus wren (2)*, American robin, northern mockingbird, Le Conte's thrasher, phainopepla, yellow warbler, black-throated gray warbler, yellow-breasted chat, California towhee, black-throated sparrow, song sparrow, summer tanager, great-tailed grackle, hooded oriole, Bullock's oriole, house finch (3), Lawrence's goldfinch, lesser goldfinch	150 (300 for species marked with *)
Passerines (open scrub nesters)	Loggerhead shrike (2)*, verdin, cactus wren (2)*, black-tailed gnatcatcher, wren tit, northern mockingbird, California thrasher, Le Conte's thrasher, Phainopepla, orange-crowned warbler, southern rufous-crowned sparrow, California towhee, black-throated sparrow, Brewer's blackbird, lesser goldfinch	150 (300 for species marked with *)

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Passerines (tower nesters)	Western kingbird (2), common raven, house finch (3)	150
Species not covered under MBTA	Domestic waterfowl, including domesticated mallards, feral (rock) pigeon, ring-necked pheasant, chukar, Eurasian collared dove, spotted dove, parrots, parakeets, European starling, house sparrow	NA

PLAN REQUIREMENTS

Consistent with DRECP CMAs LUPA-BIO-16 (Activity-Specific Bird and Bat CMAs), LUPA-BIO-17 (Activity-Specific Bird and Bat CMAs BBCS), DFA-BIO-IFS-1 (Individual Focus Species (IFS) (pre-construction/activity breeding season surveys for individual species – Bendire's thrasher, burrowing owl, golden eagle), DFA-BIO-IFS-2 (Setbacks for individual species – Bendire's thrasher, burrowing owl, golden eagle), LUPA-BIO-3 (Resource Setback Standards), LUPA-BIO-RIPWET-3 (BLM Special Status Riparian Bird Species (pre-construction/activity nesting bird surveys)), and LUPA-BIO-IFS-12 (Burrowing Owl (setbacks and monitoring for burrows)) the Plan shall include:

- A site description detailing the suitability of the Project site for nesting birds, the species that may be encountered, and potential impacts to nesting birds
- Identification of qualifications, roles, and responsibilities of the Lead Biologist, biological monitors, and avian biologists
- Methods for preconstruction nest surveys and "sweeps" for nesting activity during construction, including the following:
  - Pre-construction surveys for active nests shall be conducted by one or more qualified biological monitors at the direction of the Lead Biologist.
  - Nest surveys shall be conducted for all Project activities throughout the nesting season, identified here as beginning January 1 for raptors and hummingbirds and February 1 for other species, and continuing through August 15.
  - Any nesting surveys involving passerines shall be conducted within 4 days of the initiation of any vegetation clearance or grading. Surveys involving raptors shall be conducted 7 days prior. An additional preconstruction survey shall be conducted immediately prior to initial Project related, ground disturbing activities to confirm no new nests are found. Surveys shall be repeated regularly during nesting season in nesting habitat.
  - Survey methods shall follow standard nest-locating techniques such as those described in Martin and Guepel (1993). Surveys may be systematic transects, meandering transects, or other methods which are determined by the Lead Biologist based on site-specific characteristics, performed in the Project site and a 1,200-foot buffer for raptors and a 300-foot buffer for other species surrounding each work area. If adjacent properties are not accessible to the biological monitors, the off-site nest surveys may be conducted with binoculars.
  - Detection of nests shall be reported using an Avian Nest Reporting Form developed in coordination with USFWS and CDFW.

- Establishment of exclusion buffers surrounding active nests and procedures for reduction of buffers including the following:
  - At each active nest, the biological monitor shall establish and mark a buffer area surrounding the nest where construction activities that could disrupt nesting behavior will be excluded.
  - The default buffer distance established around a particular nest shall be species-specific, as developed by the California Public Utilities Commission Nesting Bird Working Group (2015), which ranges from 100 feet for passerines to 500 feet for raptors, in coordination with BLM, CDFW, and USFWS.
  - Construction shall not occur within the designated nest exclusion buffer until the nest is no longer active (i.e., the young fledge from the nest, or the nest is abandoned).
  - Buffer reductions for special-status species shall not occur beyond the default distances without notification to BLM, USFWS, or CDFW, as appropriate, at least 3 calendar business days prior to the proposed buffer reduction. Any threatened or endangered listed species would require agency approval prior to any buffer reduction.
- Procedures for active nest monitoring:
  - Active nest monitoring shall occur at a minimum of one to three times per week, depending on site-specific conditions.
  - Nests shall be monitored and mapped from a distance, and nest details will be recorded including species, nesting stage, and nesting outcome. Only the Lead Biologist or Avian Biologist/Monitor may enter the established buffer zone of a nest.
- Guidelines for nest removal:
  - If a bird nest must be removed during nesting season, the Applicant shall notify CDFW and USFWS and retain written documentation of the correspondence. Nests shall be removed only if they are inactive or if an active nest for a non-special status species presents a hazard to people or other wildlife. Removal of an active nest requires a permit from USFWS, which would be acquired, as needed. All nest removals shall be documented and described in the Annual Report.
- Reporting requirements:
  - A nest survey and monitoring log shall document all new and monitored nests, including date, species of bird, nest status (e.g., nest building, incubiting, fledglings present, or inactive); unique identification number of each nest monitored and coordinates (easting and northing); estimated date of nest establishment; estimated fledge date; description of and distance to nearby construction activities; relative noise level; description of any nearby non-Project activities (e.g., publicly accessible roads or trails); exclusion buffer size; and description of additional measures taken to protect nests.
  - Logs and corresponding maps showing the disturbance limits, Project features, and current nest buffer data shall be updated weekly and made available to survey crews, construction personnel, and resource agencies.
  - During construction, the Applicant shall provide an Annual Report detailing a summary of nesting activities on the Project site and survey buffers. The Applicant shall provide the annual reports to Riverside County, BLM, CDFW, and the USFWS during the last quarter following each of season of construction that occurs during the nesting season.
- Adaptive Management:

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	• Adaptive management measures shall be implemented if there is evidence of Project-related disturbance to nesting birds where initial protection methods (i.e., buffers) are determined to be ineffective. Triggers for adaptive management include agitation behavior (displacement, avoidance, and defense), increased vigilance behavior at nest sites, changes in foraging and feeding behavior, or nest site abandonment. • Potential adaptive management measures shall be identified, which may include increased buffer width; additional worker education; modifying work intervals, or allowing specific work types that may be implemented on a case-by-case basis; cessation of construction activities that are the source of disturbance to the nesting bird; or installation of visual or sound barriers.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County, CDFW, BLM, and USFWS
Monitoring Phase/Timing:	Prior to construction and during construction, operation, and maintenance
Verification Approval Party:	Riverside County, CDFW, and BLM
MITIGATION MEASURE	**MM BIO-10**: **Gen-tie lines.** Gen-tie line support structures and other facility structures shall be designed in compliance with current standards and practices to discourage their use by raptors for perching or nesting (e.g., by use of anti-perching devices). This design also reduces the potential for increased predation of special-status species, such as the desert tortoise. Mechanisms to visually warn birds (permanent markers or bird flight diverters) shall be placed on gen-tie lines at regular intervals to prevent birds from colliding with the lines (APLIC, 2006, 2012). To the extent practicable, the use of guy wires shall be avoided because they pose a collision hazard for birds and bats. Necessary guy wires shall be clearly marked with bird flight diverters to reduce the probability of collision. Shield wires shall be marked with devices that have been scientifically tested and found to significantly reduce the potential for bird collisions. Gen-tie lines shall maintain sufficient distance between all conductors and grounded components to prevent potential for electrocution of the largest birds that may occur in the area (e.g., golden eagle and turkey vulture). They shall utilize non-specular conductors and non-reflective coatings on insulators.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to and during construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM BIO-11**: **Burrowing Owl Avoidance and Relocation.** Burrowing owl protection and relocation will meet the following requirements, in accordance with CDFW burrowing owl protocols (1993, 2012): ■ Pre-construction surveys for burrowing owls, possible burrows, and sign of owls (e.g., pellets, feathers, whitewash) will be conducted throughout each work area. Survey schedules will be coordinated with constructing the desert tortoise exclusion fence and the pre-construction desert tortoise clearance surveys. As needed, follow-up surveys will be conducted no more than 14 days prior to construction. ■ Pre-construction surveys shall consist of walking parallel transects 7 to 20 meters apart, adjusting for vegetation height and density as needed, and noting any potential burrows with fresh burrowing owl sign or presence of burrowing owls.

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If an active burrowing owl burrow is detected within any Project disturbance area, or within a 150-meter buffer of the disturbance area, a 150-meter (500-foot) exclusion buffer will be maintained while the burrow remains active or occupied. The buffer may be reduced to 50 meters (160 feet) during the non-breeding season (September 1 to January 31). The size of the buffer may be adjusted based on the time-of-year, and level of disturbance in the area, after consultation with CDFW. The following provides exclusion buffer guidelines for nesting sites (CDFW, 2012); which may be adjusted in the field by the Designated Biologist/Authorized Biologist, in consultation with agency personnel.

BUOW Buffer Distance (m) and Level of Disturbance*

Time of Year	Low	Medium	High
April 1 – Aug 15	200	500	500
Aug 16 – Oct 15	200	200	500
Oct 16 – Mar 31	50	100	500

* Levels of disturbance: Low = drive by, low use, once per week; Medium = 15 minutes to 2 hours of activity, less than 49 decibels, one or two passes per day; High = more than 2 hours of activity, more than 49 decibels

- Any unoccupied suitable burrows within the solar facility footprint will be excavated and filled in under the supervision of the Lead Biologist prior to site preparation. Any unoccupied burrows located outside the construction activity zones shall be left in their current condition.
- Passive relocation shall only be used during the non-breeding season, generally September 1 to February 1, to exclude burrowing owls from the Project site. Passive relocation shall be implemented to provide replacement burrows off site (if needed); collapse all unoccupied burrows within the construction site; and install a one-way door on the occupied burrow to evict the burrowing owl without handling it. Prior to any passive relocation, biologists shall survey nearby habitats to identify and inventory suitable unoccupied natural burrows for relocation. If none are available, artificial burrows shall be constructed based on the number of burrowing owls in need of relocation.
- Artificial burrows shall be located at least 50 meters outside any temporary or permanent Project impact areas, but as close as possible to the original burrow and no more than one mile from the original burrow location if possible. Artificial burrows will be designed, constructed, and installed following guidelines provided in CDFW (2012). All artificial burrows and mapped natural burrows shall be monitored for burrowing owl use at least once per quarter throughout the construction phase of the Project.
- Following the excavation of all suitable inactive burrows within the construction area and installation of artificial burrows, burrowing owls will be passively excluded from occupied burrows. Burrow exclusion will involve the installation of one-way doors in burrow openings during the non-breeding season. Following confirmation that passive exclusion burrows are unoccupied, the burrows shall be carefully excavated using hand tools, or small tracked equipment, and backfilled to ensure that they are no longer suitable for burrowing owl use.
- Compensatory mitigation for burrowing owl shall include suitable habitat for the species at a minimum of 1:1 ratio, as determined in coordination with CDFW.

Responsible Party: Project Owner

Biological Resources	
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to construction
Verification Approval Party:	Riverside County and BLM

MITIGATION MEASURE

MM BIO-12: Desert Kit Fox and American Badger Relocation**.** Desert kit fox and American badger protection and relocation will incorporate the following requirements:

- Under direction of the Lead Biologist, biological monitors shall conduct pre-construction surveys for desert kit fox and American badger. Surveys schedules will be coordinated with constructing the desert tortoise exclusion fence and the pre-construction desert tortoise clearance surveys. Surveys shall also consider the potential presence of dens within 100 feet of the Project boundary (including utility corridors and access roads).
- If dens are detected each den shall then be classified as inactive, potentially active, or definitely active.
  - Inactive dens directly impacted by construction activities shall be excavated and backfilled to prevent reuse. Excavation and backfilling shall be conducted in accordance with standard approved desert tortoise burrow excavation and protocols. Excavation will use hand tools or a small driver-operated backhoe under close supervision of a qualified biologist, as there are no excavation standards and protocols for desert kit fox or badger.
  - All dens identified as potentially active or active within the Project footprint (solar facilities and gen-tie work sites) shall be monitored by a biological monitor for a minimum of 3 consecutive nights using a tracking medium such as diatomaceous medium or fire clay and/or infrared camera stations at the entrance. Each active or potentially active den shall be further classified as non-natal or natal (pups are present) based on tracks or photos observed after the initial 3 consecutive nights.
  - If after 3 nights of den monitoring, no desert kit fox/badger tracks are found at the burrow entrance and no photos of the target species using the den are observed, it will be determined that the desert kit fox/badger den or complex is inactive and will be excavated. If an active non-natal den is detected on the site, a 100-foot construction exclusion zone will be established until passive relocation is successfully completed. Passive relocation methods include spray deterrents, transistor radios, and ultrasonic emitters. Any kit fox hazing activities that include the use of animal repellents such as coyote urine must be cleared through the CDFW prior to use. With CDFW approval, the den may be blocked with natural materials or bag barriers. If these methods are unsuccessful, installation of one-way doors may be used. On the third day following one-way door installation, all den entrances will be inspected to ensure they are clear of sign and that desert kit fox or badger have vacated. Confirmed active dens may be excavated if passive relocation was successful. Dens shall be collapsed prior to construction of the perimeter fence, to allow animals the opportunity to move off site without impediment.
  - Potential natal dens shall be monitored for a minimum of 3 additional consecutive nights. If a den or complex is determined to be natal, the CDFW shall be notified via email within 24 hours. A 500-foot no disturbance buffer shall be maintained around all active natal dens. Passive relocation and excavation will not be implemented until monitoring confirms that the den is no longer in active use as a natal den. Active dens identified early in the pupping season, from February 1 to April 30, will not be passively relocated or excavated without prior approval from CDFW.

Biological Resources	
	• The biological monitor shall make weekly visits to the location of passive relocation to ensure that desert kit fox or badger do not re-excavate and reoccupy the area if no active ground disturbing construction is occurring within the vicinity. ■ Any documented kit fox mortality shall be reported to the CDFW within 24 hours of identification. If a dead kit fox is observed, it shall be retained and protected from scavengers until the CDFW determines if the collection of necropsy samples is justified.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County, BLM, and CDFW
Monitoring Phase/Timing:	Prior to and during construction
Verification Approval Party:	Riverside County, BLM, and CDFW
MITIGATION MEASURE	**MM BIO-13 : Wildlife Protection and Relocation Plan.** The Applicant shall prepare and implement a Wildlife Protection and Relocation Plan that incorporates the protection, buffer, and survey requirements for desert tortoise (MM BIO-7), burrowing owl (MM BIO-11), and desert kit fox and American badger (MM BIO-12). The Plan shall specify the requirements for each species and provide a framework for adaptive management and reporting of survey results. The Plan must be reviewed by Riverside County, BLM, CDFW, and USFWS prior to the start of ground-disturbing activities. Desert tortoise, burrowing owl, desert kit fox, and American badger buffers shall be maintained as directed in MM BIO-7, MM BIO-10, and MM BIO-11. **PLAN REQUIREMENTS** Consistent with DRECP CMAs LUPA-BIO-6 (Subsidized Predators Standards), LUPA-BIO-9 (Water and Wetland Dependent Species Resources), LUPA-BIO-12 (Noise), LUPA-BIO-14 (General Standard Practices), LUPA-BIO-IFS-12 (Burrowing Owl), LUPA-BIO-IFS-13 (Burrowing Owl), DFA-BIO-IFS-1 (Individual Focus Species (IFS)), the Plan will include: ■ A summary of wildlife survey methods and results; ■ Detailed qualifications, roles, and responsibilities for the Lead Biologist and monitoring biologists; ■ Procedures for pre-construction clearance surveys; • Prior to construction of solar facility, desert tortoise exclusion fencing will be installed around the entirety of the approved solar field construction areas, as well as parking and laydown areas. No more than 10 days prior to the initiation of fence construction, a pre-activity multi-species survey shall be conducted using techniques that provide 100% visual coverage of the disturbance area. If any burrow within the potential disturbance area for fence construction or inside the planned fence line is determined to be unoccupied, it will be carefully collapsed per guidelines from the Desert Tortoise Field Manual (USFWS, 2009). • If a burrow is potentially occupied by a target species, then further actions will be taken to passively exclude the animal during the appropriate season (as detailed in MM BIO-7, MM BIO-10, and MM BIO-11). • Once the fence is constructed, clearance surveys within fenced areas shall consist of 100% visual coverage using pedestrian belt transects spaced at 5-meter intervals. An additional 500-foot (150-meter) buffer outside the Project boundary shall also be surveyed with pedestrian belt transects spaced at 10 meters apart, where possible, to identify any potentially active burrows or complexes that may be indirectly

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affected by construction activities. Surveys shall focus on sign for desert tortoise, desert kit fox, American badger, and burrowing owl.

- Any burrows or den complexes identified shall be classified as inactive, possibly active, or active. Inactive dens that would be directly impacted by construction shall be excavated. All burrows and kit fox den complexes that are potentially active or active with live individuals inside will be further observed per the requirements of individual species as detailed in MM BIO-7 (desert tortoise), MM BIO-10 (burrowing owl), and MM BIO-11 (desert kit fox, American badger). Confirmed active dens may be excavated upon successful passive relocation. Excavations shall be photographed for reporting to demonstrate success and sufficiency.

- Methods for construction monitoring;
  - Biological Monitors shall be present during fence construction (security fencing, desert tortoise exclusion fencing, or both for the solar sites), vegetation removal, and ground disturbance to ensure that wildlife is not present. After vegetation is cleared, biological monitors will perform spot checks in fenced areas immediately prior to initiation of construction to ensure that no wildlife have re-entered the site.
  - Along the gen-tie line, biological monitors shall escort construction vehicles and inspect work areas prior to crews beginning any ground disturbance. All parked vehicles and equipment, and the ground beneath them, will be inspected for wildlife prior to being moved. Work activities shall be stopped by the Biological Monitor if any target species or other special-status species, such as desert tortoise, enters the work area. Work activities shall proceed at the site only after the animal has either moved away of its own accord or, is moved from harm's way by a biologist with state and federal authorization and according to any conditions identified in applicable authorizations.
- Detailed species-specific exclusion methods for special-status wildlife as follows:
  - Couch's spadefoot toad. Potential breeding habitat identified during wildlife surveys shall be inspected after sufficient rainfall for Couch's spadefoot toad. If Couch's spadefoot toads are found on the Project site, the permitting and wildlife agencies will be consulted in order to develop an avoidance strategy.
  - Desert tortoise. See MM BIO-7 for details on buffers, monitoring, exclusion, relocation, and translocation.
  - Burrowing owl. See MM BIO-10 for details on burrow buffers, monitoring, passive relocation, and excavation.
  - Desert kit fox and American badger. See MM BIO-11 for details on den buffers, monitoring, passive relocation, and excavation.
- Procedures for handling sick, injured, or dead wildlife;
  - Resource agencies would be immediately notified of sick, injured, or dead wildlife. Written follow-up notification via email will be submitted within 24 hours, including the location (GPS record), photographs (if available), and any relevant observations at the time of detection. The animal will be handled and transported only on direction from the wildlife agencies. Health and safety precautions will be used at all times when handling the animal.
- Description of adaptive management methods;
  - If there is evidence of Project-related disturbance or increased risk to special-status wildlife, where initial protection methods have been deemed ineffective, adaptive

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	management would be implemented in coordination with resource agencies, such as additional surveying and monitoring, increased buffers, seasonal restrictions, additional artificial replacement burrows, or agency approved wildlife relocation. ■ Description of reporting requirements; • During construction, reporting shall be provided in weekly, monthly, quarterly, and annual compliance reports to the permitting and wildlife agencies. During O&M, reports shall be provided quarterly, unless more frequent reporting is prudent based on species presence. Reports shall provide a summary of activities performed and the results for each species. Data recorded shall be submitted as appendices to each report.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County, BLM, CDFW, and USFWS
Monitoring Phase/Timing:	Prior to and during construction
Verification Approval Party:	Riverside County, BLM, CDFW, and USFWS
MITIGATION MEASURE	**MM BIO-14: Streambed and Watershed Protection.** If jurisdictional features cannot be avoided, prior to ground disturbance activities that could impact these aquatic features, the Applicant shall file a complete Report of Waste Discharge with the RWQCB to obtain Waste Discharge Requirements (WDR) and shall consult with CDFW on the need for a streambed alteration agreement. If permits are required, they shall be obtained prior to disturbance of jurisdictional resources. Copies of the approved permit shall be submitted to Riverside County. Compensatory mitigation for impacts to jurisdictional streambeds/washes shall be identified prior to disturbance of the features at a minimum 1:1 ratio, and a 5:1 ratio for minor incursions to desert dry wash woodland, as approved by RWQCB or CDFW, either through onsite or offsite mitigation, or purchasing credits from an approved mitigation bank. The Applicant shall comply with the compensatory mitigation required and provide proof of compliance, along with copies of permits obtained from the RWQCB and/or CDFW shall be provided to Riverside County. A Stormwater Pollution Prevention Plan (SWPPP) or SWPPP-equivalent document shall be prepared by a qualified engineer or erosion control specialist and implemented before and during construction. The SWPPP shall include BMPs for stormwater runoff quality control measures, management for concrete waste, stormwater detention, watering for dust control, and construction of perimeter silt fences, as needed. ■ The Applicant shall implement BMPs identified below to minimize adverse impacts to streambeds and watersheds. • Vehicles and equipment will not be operated in ponded or flowing water except as specified by resource agencies. • The Applicant will minimize road building, construction activities, and vegetation clearing within ephemeral drainages. • The Applicant will prevent water containing mud, silt, or other pollutants from grading or other activities from entering ephemeral drainages or being placed in locations that may be subjected to high storm flows. • Spoil sites will not be located within 30 feet from the boundaries of drainages or in locations that may be subjected to high storm flows, where spoils might be washed back into drainages.

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	• Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, unapproved herbicides, or any other substances that could be hazardous to vegetation or wildlife resources, resulting from Project-related activities, will be prevented from contaminating the soil and/or entering ephemeral drainages. The Applicant shall ensure that safety precautions specified by this measure, as well as all other safety requirements of other measures and permit conditions are followed during all phases of the Project. • When operations are completed, any excess materials or debris will be removed from the work area. No rubbish will be deposited within 150 feet of the high-water mark of any drainage during construction, operation, and decommissioning the Project. • No equipment maintenance will occur within 150 feet of any wetland, Category 3, 4, or 5 streambed, or any streambed greater than 10 feet wide. No petroleum products or other pollutants from the equipment will be allowed to enter these areas or enter any off-site state jurisdictional waters under any flow. • With the exception of the drainage control system installed for the Project, the installation of bridges, culverts, or other structures will be such that water flow (velocity and low flow channel width) is not impaired. Bottoms of temporary culverts will be placed at or below stream channel grade. • No broken concrete, debris, soil, silt, sand, bark, slash, sawdust, rubbish, or other organic or earthen material from any construction or associated activity of whatever nature will be allowed to enter into or be placed where it may be washed by rainfall or runoff into, off-site state jurisdictional waters. • Stationary equipment such as motors, pumps, generators, and welders located within or adjacent to a drainage will be positioned over drip pans. Stationary heavy equipment will have suitable containment to handle a catastrophic spill/leak. Clean up equipment such as brooms, absorbent pads, and skimmers will be on site prior to the start of construction. • The cleanup of all spills will begin immediately. USFWS, SWRCB, CDFW, BLM, and Riverside County will be notified immediately by the Applicant of any spills and will be consulted regarding clean-up procedures.
Responsible Party:	Project Owner
Responsible Monitoring Party:	CDFW and Riverside County
Monitoring Phase/Timing:	Prior to ground disturbance in jurisdictional waters of the state
Verification Approval Party:	CDFW and Riverside County
Cultural and Tribal Cultural Resources	
MITIGATION MEASURE	**APM CULT-1: Native American Monitoring**. The Applicant will enter into an agreement with interested culturally-affiliated and/or consulting tribe(s) to employ at least one Native American Monitor per archaeological monitor. A Native American monitor will be called immediately upon discovery of a cultural resource if a Native American monitor is not already present. In conjunction with the County- and BLM-approved archaeologist(s), the Native American Monitor will be invited to monitor all initial ground disturbing activities and excavation of each portion of the Project site including clearing, grubbing, tree removals, grading and trenching, as outlined in the Project's Cultural Resource Monitoring Plan (see Mitigation Measures [MMs] CUL-1 and TCR-1), and attend meeting(s) to discuss the significance of unanticipated find(s) and appropriate treatment of unanticipated

Cultural and Tribal Cultural Resources	
	resources. The Applicant will immediately alert interested culturally-affiliated and consulting tribes in the event of an unanticipated discovery. "Native American Monitor" means an individual who is presented as a representative of a tribal government for one of the culturally-affiliated or consulting tribes for the Easley Project and who has received specialized training approved by that tribal government to serve as a monitor.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to ground disturbance and during construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM CUL-1: Project Archaeologist and Cultural Resource Monitoring Plan.** Prior to issuance of grading permits: The applicant/developer shall provide evidence to the County of Riverside Planning Department that a County certified professional archaeologist (Project Archaeologist) has been contracted to implement a Cultural Resource Monitoring. Program (CRMP). A Cultural Resource Monitoring Plan shall be developed that addresses the details of all activities and provides procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant as well as address potential impacts to undiscovered buried archaeological resources associated with this project. A fully executed copy of the contract and a wet-signed copy of the Monitoring Plan shall be provided to the County Archaeologist to ensure compliance with this condition of approval. Working directly under the Project Archaeologist, an adequate number of qualified Archaeological Monitors shall be present to ensure that all earth moving activities are observed and shall be on-site during all grading activities for areas to be monitored including off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to issuing grading permits and during construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM CUL-2: Develop and Implement Cultural Resources Environmental Awareness Training.** Prior to issuance of a Notice to Proceed by the County and for the duration of ground disturbance (as defined in MM TCR-1), the Applicant shall provide Worker Environmental Awareness Program (WEAP) training to all workers prior to or on their first day of employment at the Project site. The training shall be prepared by the Cultural Resources Specialist (CRS), may be conducted by any member of the archaeological team, and may be presented in the form of an annotated and narrated digital slide show. Tribal representatives will be given the opportunity to participate in the WEAP training. The training shall be prepared in consultation with culturally affiliated Native Americans to incorporate the tribal knowledge and perspectives from these Native American groups into the presentation. The CRS shall be available (by telephone or in person) to answer questions posed by employees. The training may be discontinued when ground disturbance is completed or suspended but must be resumed if ground disturbance resumes. Training shall include the following: ■ A discussion of applicable laws and penalties under the law

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- Samples or visuals of artifacts that might be found in the Project vicinity.
- A brief review of the cultural sensitivity of the Project and the surrounding area
- A discussion of what such artifacts may look like when partially buried, or wholly buried and then freshly exposed.
- A discussion of what prehistoric and historical archaeological deposits look like at the surface and when exposed during construction, and the range of variation in the appearance of such deposits.
- Instruction that only the CRS, alternate CRS, and supervisory cultural resource field staff have the authority to halt ground disturbance in the area of a discovery to an extent sufficient to ensure that the resource is protected from further impacts, as determined by the CRS.
- Instruction that employees are to halt work on their own in the vicinity of a potential cultural resources discovery and shall contact their supervisor and the CRS or supervisory cultural resource field staff, and that redirection of work would be determined by the construction supervisor and the CRS.
- An informational brochure that identifies reporting procedures in the event of a discovery.
- An acknowledgment form signed by each worker indicating that they have received the training.
- A sticker that shall be placed on hard hats indicating that WEAP training has been completed.

This is a mandatory training, and all construction personnel must attend prior to beginning work on the Project site. A copy of the sign-in sheet shall be kept ensuring compliance with this measure. No ground disturbance shall occur prior to implementation of the WEAP training unless such activities are specifically approved by the County.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and Consulting Tribe Representative
Monitoring Phase/Timing:	Prior to construction and during any ground disturbing activities
Verification Approval Party:	Riverside County

MITIGATION MEASURE

MM CUL-3: **Archaeological Monitoring.** A qualified lead archaeological monitor that meets the Secretary of the Interior's Professional Qualifications Standards (as defined in Title 36 Code of Federal Regulations Part 61), shall be present for initial grading activities in undisturbed soil. If additional archaeological monitors are needed, they do not need to have the same SOI qualifications but may work under the supervision of the lead archaeological monitor; in such cases the lead archaeological monitor must be on site. Any additional archaeological monitors will meet the qualifications of a bachelor's degree in anthropology/archaeology or completion of an archaeological field school and two or more years of archaeological project experience. Daily monitoring forms will be completed by the archaeological monitor(s) and the CRS will be responsible for retaining and/or editing them. The lead archaeological monitor will have the authority to increase or decrease the monitoring effort should the monitoring results indicate that a change is warranted.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM

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Monitoring Phase/Timing:	During any ground disturbing activities
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM CUL-4: Unanticipated Resources.** The developer/permit holder or any successor in interest shall comply with the following for the life of this permit. If during ground disturbance activities, unanticipated cultural resources* are discovered, the following procedures shall be followed: All ground disturbance activities within 100 feet of the discovered cultural resource shall be halted and the Project archaeologist shall call the County Archaeologist immediately upon discovery of the cultural resource. A meeting shall be convened between the developer, the project archaeologist,** the Native American tribal representative, and the County Archaeologist to discuss the significance of the find. At the meeting with the aforementioned parties, a decision is to be made, with the concurrence of the County Archaeologist, as to the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural resource. Resource evaluations shall be limited to nondestructive analysis. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished. * A cultural resource site is defined, for this condition, as being a feature and/or three or more artifacts in close association with each other. ** If not already employed by the project developer, a County approved archaeologist shall be employed by the project developer to assess the significance of the cultural resource, attend the meeting described above, and continue monitoring of all future site grading activities as necessary.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	During grading or other construction, operation, or decommissioning activities
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM CUL-5: Treatment of Human Remains**. If human remains are found on this site, the developer/permit holder or any successor in interest shall comply with State Health and Safety Code Section 7050.5. .
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	During grading or other construction, operation, or decommissioning activities
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM CUL-6: Phase IV Monitoring Report.** Prior to Grading Permit Final Inspection, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for all ground disturbing activities associated with this grading permit. The report shall follow the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scopes of Work posted on the TLMA website. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade

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	meeting and evidence that any artifacts have been treated in accordance to procedures stipulated in the Cultural Resources Monitoring Plan.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to Grading Permit Final Inspection
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM TCR-1: Native American Monitor**. Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement with the consulting tribe(s) for a Native American Monitor. The Native American Monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the Project site including clearing, grubbing, tree removals, grading and trenching. In conjunction with the Archaeological Monitor(s), the Native American Monitor(s) shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. The developer/permit applicant shall submit a fully executed copy of the agreement to the County Archaeologist to ensure compliance with this condition of approval. Upon verification, the Archaeologist shall clear this condition. This agreement shall not modify any condition of approval or mitigation measure.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and Consulting Tribe Representative
Monitoring Phase/ Timing	Prior to and during all initial ground disturbing activities and excavation
Verification Approval Party:	Riverside County and Consulting Tribe Representative
MITIGATION MEASURE	**MM TCR-2: Artifact Disposition.** Prior to Grading Permit Final Inspection,, the landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the Project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. *Historic Resources* – all historic archaeological materials recovered during the archaeological investigations (this includes collections made during an earlier project, such as testing of archaeological sites that took place years ago), shall be curated at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. *Prehistoric Resources*- One of the following treatments shall be applied: (a) Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures to protect the reburial area from any future impacts. Reburial shall not occur until all required cataloguing, analysis and studies have been completed on the cultural resources, with an exception that sacred items, burial goods and Native American human remains are excluded. Any reburial processes shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request. (b) If reburial is not agreed upon by the Consulting Tribes, then the resources shall be curated at a culturally appropriate manner at the Western Science Center, a Riverside County curation facility that meets State Resources Department Office of

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	Historic Preservation Guidelines for the Curation of Archaeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to the County. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County, BLM, and Consulting Tribe Representative
Monitoring Phase/Timing:	Prior to Grading Permit Final Inspection
Verification Approval Party:	Riverside County and BLM

Hazards and Hazardous Materials	
MITIGATION MEASURE	**MM HAZ-1**: **UXO Identification, Training, and Reporting Plan.** Where ground disturbance work is involved, contractor(s) shall be OSHA HAZWOPER-trained in accordance with standard 29CFR1910.120 and hold a current certification. The Applicant shall prepare a UXO Identification, Training, and Reporting Plan to properly train all site workers in the recognition, avoidance and reporting of military waste debris and ordnance. The Applicant shall submit the plan to the County and BLM for review and approval prior to the start of construction. The plan shall contain, at a minimum, the following: ■ A description of the training program outline and materials, and the qualifications of the trainers; and ■ Identification of available trained experts that will respond to notification of discovery of any ordnance (unexploded or not); and ■ Work plan to recover and remove discovered ordnance, and complete additional field screening, possibly including geophysical surveys to investigate adjacent areas for surface, near surface or buried ordnance in all proposed land disturbance areas.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM HAZ-2: Worker Environmental Awareness Program**. The WEAP prepared for the Project shall include a personal protective equipment (PPE) program, an Emergency Action Plan (EAP), and an Injury and Illness Prevention Program (IIPP) to address health and safety issues associated with normal and unusual (emergency) conditions. It will be reviewed and approved by the County and BLM prior to construction. Construction-related safety programs and procedures shall include a respiratory protection program, among other things. Construction Plan documents shall relate at least to the following: ■ Environmental health and safety training (including, but not limited, to training on the hazards of Valley Fever, including the symptoms, proper work procedures, how to use PPE, and informing supervisor of suspected symptoms of work-related Valley Fever) ■ Site security measures ■ Site first aid training ■ Site fire protection and extinguisher maintenance, guidance, and documentation

Hazards and Hazardous Materials	
	■ Furnishing and servicing of sanitary facilities records ■ Trash collection and disposal ■ Disposal of hazardous materials and waste guidance in accordance with local, state, and federal regulations
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	During construction, operation, maintenance, and decommissioning
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM HAZ-3: Soil Management Plan.** Prior to issuance of demolition or grading permits, the Applicant shall prepare a Soil Management Plan (SMP) to guide activities during construction that will disturb potentially pesticide or petroleum hydrocarbon contaminated soils to ensure that potentially contaminated soils are identified, characterized, removed, and disposed of properly. The SMP shall be submitted to the County and BLM for approval prior to Project construction. The purpose of the SMP is to establish appropriate management practices for handling impacted soil or other materials that may be encountered during construction activities. The SMP shall be implemented during Project construction and shall include, but shall not be limited to, the following components: ■ Description of soil testing, which shall include (but not be limited to) the collection of shallow soil samples and analyses for pesticides to verify presence or absence of unknown pesticide soil contamination and the collection of soil samples at locations at and near onsite current and former fuel ASTs for analyses for petroleum hydrocarbons. This soil profiling shall be performed prior to initiation of Project construction. ■ Protocols for sampling of in-place soil to facilitate the profiling of the soil for appropriate off-site disposal or reuse, and for construction worker safety, dust mitigation during demolition and construction and potential exposure of contaminated soil to future users of the site prior to Project construction. ■ Procedures to be undertaken in the event that contamination is identified above action levels or previously unknown contamination is discovered prior to or during Project construction. ■ Sampling and laboratory analyses of any excess soil requiring disposal at an appropriate off-site waste disposal facility. ■ Procedures and protocols for the safe storage, stockpiling, and disposal of any contaminated soils. If contaminants are identified at concentrations exceeding applicable screening levels, the Applicant shall submit the SMP sampling results to the County DEH and BLM and obtain oversight from the appropriate regulatory agencies. Copies of the approved SMP shall be kept at the Project site. Any contaminated soils identified by testing conducted in compliance with the SMP and found in concentrations above established thresholds shall be removed and disposed of according to California Hazardous Waste Regulations. Contaminated soil excavated from the site shall be hauled off-site and disposed of at a licensed hazardous materials disposal site.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM

Hazards and Hazardous Materials	
Monitoring Phase/Timing:	Prior to issuance of demolition or grading permits
Verification Approval Party:	Riverside County and BLM

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MITIGATION MEASURE	**MM HWQ-1**: **Drainage Erosion and Sedimentation Control Plan (DESCP).** At least 60 days prior to site mobilization, the Applicant shall submit to the Regional Water Quality Control Board, the BLM, and Riverside County for review and approval a DESCP for managing stormwater during Project construction and operations and to prevent sediment or any other pollutants from moving offsite and into receiving waters. The DESCP can be included in the Stormwater Pollution Prevention Plan (SWPPP) and must ensure proper protection of water quality and soil resources, address disturbed soil stabilization treatments in the Project area for both road and non-road surfaces, and identify all methods used for temporary and final stabilization of inactive areas. The plan must also cover all linear Project features such as the proposed gen-tie line and any other Project component subject to disturbance. The DESCP shall contain, at a minimum, the elements presented below that outline site management activities and erosion and sediment-control Best Management Practices (BMPs) to be implemented during site mobilization, excavation, construction, and post-construction (operating) activities. ■ *Vicinity Map*. A map(s), at a minimum scale 1 inch to 500 feet, shall be provided indicating the location of all Project elements with depictions of all significant geographic features including swales, storm drains, drainage concentration points and sensitive areas. ■ *Site Delineation*. All areas subject to soil disturbance (including mowing, grubbing, grading, excavation or any other soil disturbing activity) for the Project shall be delineated showing boundary lines of all construction areas and the location of all existing and proposed structures and drainage facilities. ■ *Clearing and Grading Plans*. The DESCP shall provide a delineation of all areas to be cleared of vegetation and areas to be preserved. The plan shall provide elevations, slopes, locations, and extent of all proposed grading as shown by contours, cross sections, or other means. The locations of any disposal areas, fills, or other special features shall also be shown. Existing and proposed topography shall be illustrated by tying in proposed contours with existing topography. ■ *Clearing and Grading Narrative*. The DESCP shall include a table with the estimated quantities of material excavated or filled for the site and all Project elements, whether such excavation or fill is temporary or permanent, and the amount of such material to be imported or exported. All areas subject to soil disturbance shall be included in the table. ■ *Erosion Control*. The plan shall address treatments to be used on exposed soil during construction and operation including specifically identifying all chemical-based dust palliatives, soil bonding, and weighting agents appropriate for use that would not cause adverse effects to vegetation. BMPs shall include measures designed to provide temporary stabilization of inactive disturbed areas and will be applied as soon as possible consistent with SCAQMD (Rule 403) and SWRCB Construction General Permit requirements. The timing of suppressant or binder application will occur as soon as possible and consistent with dust and stormwater permit requirements. Any soil stabilizers proposed shall be approved for use by the Project's Restoration Specialist to ensure that the products shall not impede restoration goals.

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- Best Management Practices Plan. The DESCP shall identify on the topographic site map(s) the location of the site specific BMPs to be employed during each phase of construction (initial grading, Project element excavation and construction, and final grading/ stabilization). BMPs shall include measures designed to control dust, stabilize construction access roads and entrances, and control stormwater runoff and sediment transport consistent with SCAQMD (Rule 403) and SWRCB Construction General Permit requirements.
- *Best Management Practices Narrative*. The DESCP shall show the location, timing, and maintenance schedule of all erosion- and sediment-control BMPs to be used prior to initial grading, during excavations and construction, final grading/stabilization, and operation. Separate BMP implementation schedules shall be provided for each Project element for each phase of construction. The maintenance schedule shall include post-construction maintenance of structural-control BMPs, or a statement provided about when such information would be available.
- The DESCP shall be prepared, stamped, and sealed by a professional engineer or Qualified SWPPP Developer. The DESCP shall include copies of recommendations, conditions, and provisions from the Regional Board and/or BLM.
- The DESCP may be part of the SWPPP and shall be kept onsite, kept updated, and readily available on request. The DESCP and SWPPP must demonstrate compliance with other water quality permits (WDR and LSAA), which may have restrictions on types of erosion or sedimentation control materials used. SWPPP inspection reporting will be consistent with the requirements of the SWRCB Construction General Permit.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	At least 60 days prior to site mobilization
Verification Approval Party:	Riverside County and BLM

MITIGATION MEASURE

MM HWQ-2: **Septic System Review and Permitting.** Before the start of construction, the Applicant shall submit to Riverside County Department of Environmental Health an evaluation of the Project septic system to ensure that the proposed use of the system is consistent with federal, state, and local requirements for septic system design, including requirements for percolation, vertical distance from the groundwater table, and setback from the nearest groundwater well.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County DEH
Monitoring Phase/Timing:	Prior to start of construction
Verification Approval Party:	Riverside County DEH

MITIGATION MEASURE

MM HWQ-3: **Palo Verde Mesa Groundwater Basin (PVMGB) Protection.** If water for the Project, to be obtained from on- or off-site well(s) within the Chuckwalla Valley Groundwater Basin (CVGB), is extracted from on- or off-site well(s) that is/are owned and/or operated by the Applicant, the Applicant shall develop a Colorado River Water Supply Plan (CRWSP) to monitor groundwater extractions from the Applicant owned and/or operated on- or off-site well(s) to prevent impacts to the adjacent PVMGB related to groundwater extraction below the Colorado River Accounting Surface.

The CRWSP shall be submitted to the U.S. Bureau of Reclamation and BLM for review and approval at least 60 days prior to the initiation of construction. No pumping of ground-

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water below the accounting surface shall occur. A copy of the CRWSP shall also be submitted to the Metropolitan Water District of Southern California for review and comment.

(a) The CRWSP shall describe groundwater monitoring activities and quarterly data reports to be closely reviewed for depth to groundwater information, and proximity of the depth of Project-related groundwater pumping to the Colorado River Accounting Surface. To ensure that Project-related groundwater pumping does not draw water from below the accounting surface, the Applicant shall implement water conservation activities, including cessation of pumping, to reduce the amount of water withdrawn from on- or off-site well(s) that is/are owned and/or operated by the Applicant.

(i) The Colorado River Accounting Surface is at an elevation between approximately 238 and 240 feet above mean sea level (amsl) in the Chuckwalla Valley (Argonne, 2013). Groundwater elevation in the Project area is approximately 489 feet amsl as of the first quarter of 2024. The numerical groundwater model developed for the Project Water Supply Assessment (GSI, 2024; discussed below) included estimates of the total cone of depression considering cumulative drawdown from all potential pumping in the CVGB, including the Project, for the life of the Project through the decommissioning phase. The estimated drawdown at the Project well after the planned 2-year construction period was less than 2 feet. The temporary drawdown at the well during pumping, however, would be greater.

(ii) Assuming a conservatively-large temporary drawdown of 100 feet at the Project well (up to 80 feet of temporary drawdown has been recorded from a well-used for construction of a nearby solar project) during peak water demand during Project construction, the water levels in the Project well would be at least 150 feet above the Colorado River Accounting Surface. The water levels within the Project well would be monitored as part of the GMRMP (MM HWQ-4) per the DRECP LUPA Conservation and Management Action (CMA) Soil and Water (SW) 24. MM HWQ-3 ensures that the Project will not extract water from below the Accounting Surface, as it requires that pumping from Project wells be decreased or stopped well before water levels reached the Colorado River Accounting Surface.

Responsible Party:	Project Owner
Responsible Monitoring Party:	United States Bureau of Reclamation and BLM
Monitoring Phase/Timing:	60 days prior to the initiation of construction and any time groundwater withdrawal will likely reach Accounting Surface during life of Project
Verification Approval Party:	United States Bureau of Reclamation and BLM

MITIGATION MEASURE

MM HWQ-4: **Groundwater Monitoring, Reporting, and Mitigation Plan (GMRMP).** Before the Project uses groundwater pumped from any Applicant owned and/or operated well (on site or off site) that extracts water from the CVGB, the Applicant shall retain a BLM-approved qualified hydrogeologist to develop a GMRMP, in coordination with Riverside County and BLM, to ensure that groundwater wells surrounding Project supply well(s) are not adversely affected by Project activities, i.e., chronic lowering of groundwater levels and degradation of groundwater quality. The Applicant shall submit the GMRMP to Riverside County and BLM for review and approval. Additionally, although no Groundwater Sustainability Agencies (GSAs) have been established for the CVGB, in the event that such agencies have been established when the GMRMP is developed, the Applicant

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also shall submit the GMRMP to those GSAs. The Applicant shall implement the approved GMRMP throughout any Project phase that pumps groundwater for consumptive use.

The GMRMP shall provide a detailed methodology for monitoring site groundwater levels and comparisons for levels within the CVGB including identification of the closest private wells to the Project's well(s). Groundwater level data from wells at adjacent and nearby solar facilities and other Projects on BLM-administered public lands shall be provided by the BLM for review and comparison, to the extent available to the Applicant. Monitoring shall be performed during pre-construction, construction, and operation of the Project, to establish pre-construction and Project-related groundwater level and water quality trends that can be quantitatively compared against observed and simulated trends near the Project's pumping well(s) and near potentially impacted existing wells. The GMRMP shall include a schedule for submittal of quarterly data reports by the Applicant to the GMRMP designated agencies and the GSA(s) (if established), for the duration of the construction period. These quarterly data reports shall be prepared and submitted for review and shall include water level monitoring data and effect on the nearest off-site private wells. The designated agencies shall determine whether groundwater wells surrounding the Project supply well(s) are adversely affected (i.e., chronic lowering of groundwater levels and degradation of groundwater quality) by Project activities and, if so, shall require one or more of the following:

- Cessation or reduction of pumping at the Project well(s) until groundwater levels return to levels that allow nearby wells to resume pre-Project pumping levels;
- Compensation for whatever additional equipment is necessary to lower nearby pumps to levels that can adequately continue pumping;
- Compensation to repair or replace wells found to be damaged or inoperable due to lowered groundwater levels; or
- Compensation for increased energy cost due to Project-related well drawdown.

After the completion of construction, the Applicant and the BLM shall jointly evaluate the effectiveness of the GMRMP and determine if monitoring and reporting frequencies or procedures should be revised or eliminated.

Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to using any water pumped from any Applicant owned and/or operated well that extracts water from the CVGB
Verification Approval Party:	Riverside County and BLM

MITIGATION MEASURE

MM HWQ-5: **Project Drainage Plan.** The Applicant shall provide the RWQCB, Riverside County and BLM with a drainage plan for review and approval prior to construction, which includes the following information:

- Hydrologic assessment of flood discharges affecting each parcel.
- A detailed on-site hydraulic analysis utilizing FLO 2D or similar two-dimensional hydraulic model which models pre- and post-development flood conditions for the 10- and 100-year storm events. The post-development model must include all proposed Project features, contours, and drainage improvements. Graphical output must include depth and velocity mapping as well as mapping which graphically shows the changes in both parameters between the pre- and post-development conditions.
- The Drainage Plan shall show the location of all watercourses, drainage concentration points and drainage ditches as they enter, cross, and exit the site. It shall include pre-

Hydrology and Water Quality	
	development and post-development peak flow estimates. It shall include hydraulic calculations to determine flood conditions, floodplain limits, flood depths and velocities. It shall show the relationship of drainage and flood features to the features of the Project, including buildings, fences, substations, access roads, culverts, linear features, and panel supports, demonstrating adequate design to protect from flooding, erosion and scour, and to do so without adversely affecting adjacent property, inducing erosion, or concentrating or diverting flows. ■ The Plan shall show how drainage will be conveyed through the site without adversely affecting other property, either through increased flood hazard or increased potential for scour and erosion. Proposed fencing shall allow runoff to traverse the Project site unencumbered, as feasible. The Plan shall include an assessment of existing diversion berms and channels around parcel perimeters and the magnitude and frequency of flood that would be diverted by these existing features, and the probable integrity of these features to withstand flows. It shall show how those that are on the Project site will be affected by grading. It shall include an assessment of flows approaching proposed perimeter fences, whether or not adjacent to existing berms, and make design recommendations to avoid flow diversions by these fences while taking into account relevant biological mitigation measures. Design recommendations may include creating fence openings large enough to allow the passage of debris-laden flows without the potential for diversions to other property. ■ The Plan shall have detailed design of flood retention features necessary to avoid any increase in downstream flood peak flow rates. ■ Drainage of Project Site Narrative – The Plan shall include a narrative of the measures necessary to protect the site and Project features from flooding, erosion and sedimentation, and measures taken to prevent Project-induced erosion and flooding of adjacent property.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM HWQ-6**: **Flood Protection.** The O&M Building, BESS switchyard, and all other Project buildings shall either be situated outside of the 100-year floodplain or sufficiently protected against dislodgement by flooding where placement outside the floodplain is not practical. Flood protection shall consist of elevating the structures on fill to at least the highest anticipated adjacent flood level as measured from a horizontal stow position. Solar panels shall be situated at least one foot above the highest anticipated local flood level. All structures using posts or poles for foundations, including transmission poles or towers, shall be designed to protect against substantial scour from the 100-year flood event. The Project must comply with Riverside County Ordinance No. 458 for projects within a Special Flood Hazard Area or floodplain: electrical, heating, ventilation, plumbing, and air conditioning equipment and other service facilities must be designed or located to prevent water from entering or accumulating within the components during flooding.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County
Monitoring Phase/Timing:	Prior to final engineering

Hydrology and Water Quality	
Verification Approval Party:	Riverside County
Noise and Vibration	
MITIGATION MEASURE	**APM NOISE-1: Construction Timing.** Applicant will avoid or minimize use of any impact hammer for pile driving or other equipment similarly capable of producing disruptive noise during construction activities within a one-mile radius from the residential parcel on the northeast corner of around the Lake Tamarisk Desert Resort community during the winter months of highest residency (November 1 to March 31). If based on the final construction schedule, use of such equipment is necessary within this geographic area during the aforementioned time period, the Applicant will avoid or minimize this construction activity prior to 7:00 a.m. and after 6:00 p.m. The Applicant will also avoid nighttime equipment deliveries between 10:00 p.m. and 7:00 a.m.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	During construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM N-1**: **Construction Restrictions.** Heavy equipment operation, noisy construction work relating to any Project features onsite, and truck trips associated with materials and equipment deliveries shall be restricted to the times delineated below, unless a special permit has been issued by the County of Riverside: during June through September, between 6 a.m. to 6 p.m.; and during October through May, between 7:00 a.m. to 6:00 p.m. Haul truck engines and other engines powering fixed or mobile construction equipment shall be equipped with adequate mufflers. Haul trucks shall be operated in accordance with posted speed limits. Truck engine exhaust brake use shall be limited to emergencies. The construction contractor shall locate equipment staging in areas to create the greatest distance between construction-related noise sources and noise sensitive receivers nearest the Project site during Project construction. Where feasible, the construction contractor shall place all stationary construction equipment so that emitted noise is directed away from the noise sensitive receptors nearest the Project site. No music or electronically reinforced speech from construction workers shall be audible at noise-sensitive properties.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	During construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM N-2: Public Notification Process.** At least 15 days prior to the start of ground disturbance, the Project owner shall notify all residents within one mile of the Project site and the linear facilities, by mail or by other effective means, of the commencement of Project construction. At the same time, the Project owner shall establish a telephone number for use by the public to report any undesirable noise conditions associated with the construction and operation of the Project. If the telephone is not staffed 24 hours a day, the Project owner shall include an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. This telephone number shall be posted at the Project site during construction where it is visible to passersby. This

Noise and Vibration	
	telephone number shall be maintained until the Project has been operational for at least one year.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	At least 15 days prior to ground disturbance
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM N-3: Noise Complaint Process.** Throughout the construction and operation of the Project, the Project owner shall document, investigate, evaluate, and attempt to resolve all Project-related noise complaints. The Project owner or authorized agent shall: (a) Use a Noise Complaint Resolution Form, or other documentation procedure acceptable to the County, to record and report the Project owner's response to resolving each noise complaint; (b) Attempt to contact the person(s) making the noise complaint within 24 hours; (c) Conduct an investigation to determine the source of noise in the complaint; (d) If the noise is Project-related, take all feasible measures to reduce the source of the noise; and (e) Submit a report to the County documenting the complaint and actions taken. The report shall include: a complaint summary, including the final results of noise reduction efforts and, if obtainable, a signed statement by the complainant stating that the noise problem has been resolved to the complainant's satisfaction.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	During construction and operation
Verification Approval Party:	Riverside County and BLM
Paleontological Resources	
MITIGATION MEASURE	**MM PR-1: Paleontological Resource Monitoring and Mitigation Plan (PRMP).** Prior to the start of any Project-related construction activities, the Applicant shall retain a County- and BLM-approved paleontologist (Project Paleontologist) to prepare and implement a project-specific PRMP to be approved by the County and BLM. The Project Paleontologist shall hold a BLM-issued Paleontological Resource Use Permit and be responsible for implementing all the paleontological conditions of approval and for using qualified paleontologists to assist in work and field monitoring. At a minimum, information to be contained in the PRMP, in addition to other information required under industry standard, Society of Vertebrate Paleontology standards, and BLM paleontology program policy and standards, is as follows: ■ Identification (name) and qualifications of the Project Paleontologist and qualified paleontological monitors to be employed for grading operations monitoring. ■ Identification of personnel with authority and responsibility to temporarily halt or divert grading equipment to allow for recovery of large specimens. ■ Description of the project site and planned earthwork and excavation. ■ A site-specific plan and map prepared by the Project Paleontologist which identifies construction impact areas with sediments of High (PFYC 4) and Moderate (PFYC 3a) sensitivity for encountering significant paleontological resources and the approximate

Paleontological Resources	
	depths at which those resources are likely to be encountered for each Project component. ■ The PRMP shall require the qualified paleontological monitor(s) to monitor all construction-related earth-moving activities in sediments determined to have a High (PFYC 4) sensitivity. ■ The PRMP shall define monitoring procedures and methodology and shall specify that sediments of Moderate (PFYC 3a) or undetermined sensitivity shall be monitored on a part-time basis (as determined by the Project Paleontologist). Sediments with very low or low potential will not require paleontological monitoring (PFYC 1 and 2). ■ The PRMP shall detail methods of recovery, preparation, and analysis of specimens, the final curation location of specimens at the repository identified in the BLM-issued Paleontological Resource Use Permit, data analysis, and reporting. Where possible, recovery is preferred over avoidance in order to mitigate the potential for looting of paleontological resources. ■ The PRMP shall specify that all paleontological work undertaken by the Applicant on public lands administered by BLM shall be carried out by qualified, permitted paleontologists with the appropriate current BLM Paleontological Resources Use Permit. ■ Identification of personnel with authority and responsibility to temporarily halt or divert ground-disturbance activities to allow for recovery of large specimens. The PRMP shall be submitted to the County and BLM for review and approval 60 days prior to start of Project construction. The PRMP must be approved by the County and BLM prior to the Notice To Proceed.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to the start of any project-related construction activities
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM PR-2: Worker Environmental Awareness Program (WEAP).** Prior to the start of Project-related construction activities, a paleontological component to the WEAP shall be developed by the Project Paleontologist. The WEAP shall address the potential to encounter paleontological resources in the field, the sensitivity and importance of these resources, and the legal obligations to preserve and protect such resources. The training program shall also include the set of reporting procedures that workers are to follow if paleontological resources are encountered during Project activities. The WEAP may be combined with other environmental training programs for the Project. All field personnel will receive WEAP training on paleontological resources prior to Project-related construction activities.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Prior to the start of any project-related construction activities
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM PR-3: Paleontological Monitoring and Fossil Recovery**. The PRMP shall identify monitoring frequency and intensity of all areas of the Project site, particularly in areas underlain by geologic units assigned paleontological sensitivity of High (PFYC 4) or Moderate (PFYC 3a). Monitoring will entail the visual inspection of excavated or graded

Paleontological Resources	
	areas and trench sidewalls. If the Project Paleontologist determines full-time monitoring is no longer warranted, based on the geologic conditions at depth, he or she may recommend to the BLM Authorized Officer that monitoring be reduced or cease entirely. In the event that a paleontological resource is discovered, the paleontological monitor will have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and, if appropriate, collected. If the resource is determined to be of scientific significance, the Project Paleontologist shall complete the following: ■ **Salvage of Fossils.** If fossils are discovered, all work in the immediate vicinity shall be halted to allow the paleontological monitor, and/or Project Paleontologist to evaluate the discovery and determine if the fossil may be considered significant. If the fossils are determined to be potentially significant, the Project Paleontologist (or paleontological monitor) will recover them following standard field procedures for collecting paleontological as outlined in the PRMP prepared for the Project. The Project Paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the potentially significant fossil(s) can be removed in a safe and timely manner. ■ **Fossil Preparation and Curation.** The museum that has agreed to accept fossils that may be discovered during Project-related excavations will be identified on the Paleontological Resources Use Permit held by the Project Paleontologist and in the PRMP. Upon completion of Project ground-disturbing activities, all significant fossils collected shall be prepared in a properly equipped laboratory to a point ready for curation. Preparation may include the removal of excess matrix from fossil materials and stabilizing or repairing specimens. During preparation and inventory, the fossils specimens shall be identified to the lowest taxonomic level practical prior to curation at an accredited museum. The fossil specimens must be delivered to the County- and BLM-approved repository (identified on the permit and in the PRMP) and receipt(s) of collections submitted to the County and BLM no later than 60 days after all ground-disturbing activities are completed.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	During construction
Verification Approval Party:	Riverside County and BLM
MITIGATION MEASURE	**MM PR-4: Paleontological Resources Monitoring Report.** The Applicant shall ensure preparation of a paleontological resource mitigation and monitoring report by the Project Paleontologist following completion of ground-disturbing activities. The contents of the report shall include, but not be limited to, a description and inventory list of recovered fossil materials (if any); a map showing the location of paleontological resources found in the field; determinations of scientific significance; proof of accession of fossil materials into the pre-approved museum or other repository; and a statement by the Project Paleontologist that Project impacts to paleontological resources have been mitigated. The report shall be certified by the professionally qualified Project Paleontologist responsible for the content of the report and submitted to the County and BLM. In addition, all appropriate fossil location information shall be submitted to the Western Information Center, San Bernardino County Museum, and Los Angeles County Museum of Natural History, at a minimum, for incorporation into their Regional Locality Inventories.
Responsible Party:	Project Owner

Paleontological Resources	
Responsible Monitoring Party:	Riverside County and BLM
Monitoring Phase/Timing:	Following completion of ground disturbing activities
Verification Approval Party:	Riverside County and BLM

Traffic and Transportation

MITIGATION MEASURE

MM TRA-1: **Construction Traffic Control Plan.** Prior to the start of construction, the Project owner shall submit a Construction Traffic Control Plan for review and approval by Caltrans and Riverside County for affected roads and intersections that would be directly affected by the construction activities and/or would require permits and approvals. The Construction Traffic Control Plan shall include, but not be limited to:

- If multiple construction projects occur at the same time and conditions at the intersection warrant, plans for installation of a temporary signal or use of manual intersection control during the construction period at the I-10 westbound ramp at SR-177. Additionally, if conditions warrant, geometry changes shall be considered in coordination with Caltrans and Riverside County, and implemented, if necessary, in addition to signalization at the I-10 westbound ramp and SR-177. These geometry changes could include a turn pocket.
- The locations and use of flaggers, warning signs, barricades, delineators, cones, arrow boards, etc., according to standard guidelines outlined in the Manual on Uniform Traffic Control Devices, the Standard Specifications for Public Works Construction, and/or the California Joint Utility Traffic Control Manual.
- The locations of all road or traffic lane segments that would need to be temporarily closed or disrupted due to construction activities.
- The locations where guard poles, netting, or similar means to protect transportation facilities for any construction or conductor installation work requiring the crossing of a local street highway is proposed.
- The use of continuous traffic breaks operated by the California Highway Patrol on state highways (if necessary).
- Additional methods to reduce temporary traffic delays to the maximum extent feasible during morning (7:00 a.m. to 9:00 a.m.) and afternoon (4:00 p.m. to 6:00 p.m.) peak traffic periods, or as directed in writing by the affected public agency in encroachment or other permits). This should also include feasible ways to reduce construction-related trips on I-10, SR-177, and Kaiser Road during peak traffic periods.
- Plans to encourage or provide ridesharing/carpooling opportunities for construction and operational workers.
- Incorporation wildlife protection measures, as required in MM BIO-6.
- Plans to provide written notification to property owners and tenants at properties affected by access restrictions to inform them about the timing and duration of obstructions and to arrange for alternative access if necessary. The coordination shall occur at least one week prior to any blockages.
- Plans to coordinate in advance with emergency service providers to avoid restricting the movements of emergency vehicles. Police departments and fire departments shall be notified in advance by the Project owner of the proposed locations, nature, timing, and duration of any roadway disruptions, and shall be advised of any access restrictions that could impact their effectiveness. At locations where roads will be blocked, provisions shall be ready at all times to accommodate emergency vehicles, such as imme-

Traffic and Transportation	
	diately stopping work for emergency vehicle passage, providing short detours, and developing alternate routes in conjunction with the public agencies. ■ Define the method to maintaining close coordination, prior to and during construction, with Caltrans and Riverside County to minimize cumulative impacts of multiple simultaneous construction projects affecting shared portions of the circulation system. Coordination with adjacent development projects to spread work shifts into multiple hours (instead of peak hour) or the installation of additional temporary traffic signals or manual traffic control officers during peak hours to mitigate the temporary impacts.
Responsible Party:	Project Owner
Responsible Monitoring Party:	Caltrans or Riverside County
Monitoring Phase/Timing:	Prior to the start of construction
Verification Approval Party:	Caltrans or Riverside County
MITIGATION MEASURE	**MM TRA-2: Repair Roadways and Transportation Facilities Damaged by Construction Activities.** If roadways, sidewalks, medians, curbs, shoulders, or other such transportation features are damaged by Project construction activities, as determined by the affected public agency, such damage shall be repaired and restored to their pre-Project condition by the Project owner. Prior to construction, the Project owner shall confer with Caltrans and Riverside County regarding the roads within 500 feet in each direction of Project access points (where heavy vehicles will leave public roads to reach Project sites) and regarding the roads to be crossed by the proposed gen-tie line. At least 30 days prior to construction, or as requested by Riverside County or Caltrans, the Project owner shall photograph or video record all affected roadway segments and shall provide Riverside County and Caltrans with a copy of these images, if requested. At the end of major construction, the Project owner shall coordinate with each affected jurisdiction to confirm whether repairs are required. Any damage demonstrable to the Project is to be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by the Project owner and the affected jurisdiction. If multiple projects are using the transportation features, the Easley Project owner shall pay its fair share of the required repairs. the Project owner shall provide Riverside County and Caltrans (as applicable) proof when any necessary repairs have been completed.
Wildfire	
Responsible Party:	Project Owner
Responsible Monitoring Party:	Caltrans or Riverside County
Monitoring Phase/Timing:	Prior to the start of construction and at end of major construction
Verification Approval Party:	Caltrans or Riverside County
MITIGATION MEASURE	**MM FIRE-1: Fire Safety.** The Fire Management and Prevention Plan prepared by the Project owner to ensure the safety of workers and the public and minimize fire risk during construction, operation and maintenance, and decommissioning for the Project shall include, but not be limited to, the following elements: ■ Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, and hot work restrictions. ■ Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days.

Wildfire

- All internal combustion engines used at the Project site shall be equipped with spark arrestors. Spark arrestors shall be in good working order.
- Once new access roads have been cut and initial fencing completed, light trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Mufflers on all cars and light trucks shall be maintained in good working order.
- Fire rules shall be posted on the Project bulletin board at the contractor's field office and areas visible to employees.
- Equipment parking areas and small stationary engine sites shall be cleared of all flammable materials.
- Smoking shall be prohibited in all vegetated areas and within 50 feet of combustible materials storage and shall be limited to paved areas or areas cleared of all vegetation.
- Each construction site (if construction occurs simultaneously at various locations) shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires.
- The Project owner shall coordinate with BLM and RCFD to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur at the Project site, including incidents such as fire or explosion at or with the BESS.
- The plan shall include information about the type of BESS technology on site, potential hazards, and procedures for disconnecting or shutting down the BESS in case of fire or to reduce the chance of fire.
- All construction workers, plant personnel, and maintenance workers visiting the plant and/or transmission lines to perform maintenance activities shall receive training on fire prevention procedures, the proper use of firefighting equipment, and procedures to be followed in the event of a fire. Training records shall be maintained and be available for review by BLM and RCFD. Fire prevention procedures shall be included in the Project's Worker Environmental Awareness Program.
- Vegetation near all solar panel arrays, ancillary equipment, and access roads shall be controlled through periodic cutting and spraying of weeds, in accordance with the Weed Management Plan.
- BLM and RCFD shall be consulted during plan preparation and fire safety measures recommended by these agencies included in the plan.
- The plan shall list fire prevention procedures and specific emergency response and evacuation measures that shall be required to be followed during emergency situations.
- All on-site employees shall participate in annual fire prevention and response training exercises with the BLM and RCFD.
- The plan shall list all applicable wildland fire management plans and policies established by state and local agencies and demonstrate how the Project will comply with these requirements.
- The Project owner shall designate an emergency services coordinator from among the full-time on-site employees who shall perform routine patrols of the site during the fire season equipped with a portable fire extinguisher and communications equipment. The Project owner shall notify BLM and RCFD of the name and contact information of the current emergency services coordinator in the event of any change.

Wildfire	
	■ Remote monitoring of all major electrical equipment (transformers and inverters) will screen for unusual operating conditions. Higher than nominal temperatures, for example, can be compared with other operational factors to indicate the potential for overheating which under certain conditions could precipitate a fire. Units could then be shut down or generation curtailed remotely until corrective actions are taken. ■ Fires ignited on site shall be immediately reported to BLM and RCFD. ■ The engineering, procurement, and construction contract(s) for the Project shall provide reference to or clearly state the requirements of this mitigation measure. ■ The Project owner must provide the Fire Management and Prevention Plan to BLM for review and approval and to RCFD for review and comment before construction.
Responsible Party:	Project Owner
Responsible Monitoring Party:	BLM and RCFD
Monitoring Phase/Timing:	Prior to the start of construction
Verification Approval Party:	BLM and RCFD

L.2. DRECP CONSERVATION AND MANAGEMENT ACTIONS

The Easley Renewable Energy Project will fully comply with all applicable Desert Renewable Energy Conservation Plan (DRECP) Conservation and Management Actions (CMAs) on lands administered by the U.S. Bureau of Land Management (BLM), and the Applicant has stated that the Easley Project will also voluntarily comply with all applicable DRECP CMAs on private lands, the requirements of which have been incorporated into CEQA mitigation measures (see Section L.1).

The applicable DRECP CMAs are listed below, and a detailed BLM Project consistency CMA analysis is provided in EIR Appendix CC.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
Biological Resources			
Biological Resources	**LUPA-BIO-1**	Conduct a habitat assessment (see Glossary of Terms) of Focus and BLM Special Status Species' suitable habitat for all activities and identify and/or delineate the vegetation types, rare alliances, and special features (e.g., Aeolian sand transport resources, Joshua tree, microphyll woodlands, carbon sequestration characteristics, seeps, climate refugia) present using the most current information, data sources, and tools (e.g., DRECP land cover mapping, aerial photos, DRECP species models, and reconnaissance site visits) to identify suitable habitat (see Glossary of Terms) for Focus and BLM Special Status Species. If required by the relevant species-specific CMAs, conduct any subsequent protocol or adequate presence/absence surveys to identify species occupancy status and a more detailed mapping of suitable habitat to inform siting and design considerations. If required by relevant species specific CMAs, conduct analysis of percentage of impacts to suitable habitat and modeled suitable habitat. BLM will not require protocol surveys in sites determined by the designated biologist to be unviable for occupancy of the species, or if baseline studies inferred absence during the current or previous active season. Utilize the most recent and applicable assessment protocols and guidance documents for vegetation types and jurisdictional waters and wetlands that have been approved by BLM, and the appropriate responsible regulatory agencies, as applicable.	Biological resources surveys have been conducted. Survey protocols and the Survey Work Plan for Focus and BLM Special-Status Species were performed in compliance with BLM protocols and coordination, as described in the Biological Resources Technical Report; therefore, the Project would comply with the CMA.
	LUPA-BIO-2	Designated biologist(s) (see Glossary of Terms), will conduct, and oversee where appropriate, activity-specific required biological monitoring during pre-construction, construction, and decommissioning to ensure that avoidance and minimization measures are appropriately implemented and are effective. The appropriate required monitoring will be determined during the environmental analysis and BLM approval process. The designated biologist(s) will submit monitoring reports directly to BLM.	With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.
Resource Setback Standards	**LUPA-BIO-3**	Resource setbacks (see Glossary of Terms) have been identified to avoid and minimize the adverse effects to specific biological resources. Setbacks are not considered additive and are measured as specified in the applicable CMA. Allowable minor incursions (see Glossary of Terms), as per specific CMAs do not affect the following setback measurement descriptions. Generally, setbacks (which range in distances for different biological resources) for the appropriate resources are measured from: ■ The edge of each of the DRECP vegetation types, including but not limited to those in the riparian or wetland vegetation groups (as defined by alliances within the vegetation type descriptions and mapped based on the vegetation type habitat assessments described in LUPA-BIO-1).	Except for minor incursion by gen-tie and collector lines and access roadways, the Project would avoid desert dry wash woodland with the required 200-foot buffer under LUPA-BIO-RIPWET-1, as well as all other applicable resource setbacks. The Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		■ The edge of the mapped riparian vegetation or the Federal Emergency Management Agency (FEMA) 100-year floodplain, whichever is greater, for the Mojave River. ■ The edge of the vegetation extent for specified focus and BLM sensitive plant species. ■ The edge of suitable habitat or active nest substrates for the appropriate focus and BLM Special-Status Species.	
Seasonal Restrictions	**LUPA-BIO-4**	For activities that may impact Focus and BLM Special Status Species, implement all required species-specific seasonal restrictions on pre- construction, construction, operations, and decommissioning activities. Species-specific seasonal restriction dates are described in the applicable CMAs. Alternatively, to avoid a seasonal restriction associated with visual disturbance, installation of a visual barrier may be evaluated on a case-by-case basis that will result in the breeding, nesting, lambing, fawning, or roosting species not being affected by visual disturbance from construction activities subject to seasonal restriction. The proposed installation and use of a visual barrier to avoid a species seasonal restriction will be analyzed in the activity/project-specific environmental analysis.	Seasonal restrictions and requirements are specified in the species-specific CMAs and will be further specified in the required mitigation plans. The Project will comply with this CMA.
Worker Education	**LUPA-BIO-5**	All activities, as determined appropriate on an activity-by-activity basis, will implement a worker education program that meets the approval of the BLM. The program will be carried out during all phases of the project (site mobilization, ground disturbance, grading, construction, operation, closure/decommissioning or project abandonment, and restoration/reclamation activities). The worker education program will provide interpretation for non-English speaking workers, and provide the same instruction for new workers prior to their working on site. As appropriate based on the activity, the program will contain information about: ■ Site-specific biological and nonbiological resources. ■ Information on the legal protection for protected resources and penalties for violation of federal and state laws and administrative sanctions for failure to comply with LUPA CMA requirements intended to protect site-specific biological and nonbiological resources. ■ The required LUPA and project-specific measures for avoiding and minimizing effects during all project phases, including but not limited to resource setbacks, trash, speed limits, etc. ■ Reporting requirements and measures to follow if protected resources are encountered, including potential work stoppage and requirements for notification of the designated biologist. Measures that personnel can take to promote the conservation of biological and nonbiological resources.	With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
Subsidized Predators Standards	**LUPA-BIO-6**	Subsidized predator standards, approved by BLM, in coordination with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW), will be implemented during all appropriate phases of activities, including but not limited to renewable energy activities, to manage predator food subsidies, water subsidies, and breeding sites including the following: ■ Common Raven management actions will be implemented for all activities to address food and water subsidies and roosting and nesting sites specific to the Common Raven. These include identification of monitoring reporting procedures and requirements; strategies for refuse management; as well as design strategies and passive repellant methods to avoid providing perches, nesting sites, and roosting sites for Common Ravens. ■ The application of water and/or other palliatives for dust abatement in construction areas and during project operations and maintenance will be done with the minimum amount of water necessary to meet safety and air quality standards and in a manner that prevents the formation of puddles, which could attract wildlife and wildlife predators. ■ Following the most recent national policy and guidance, BLM will take actions to not introduce, dispose of, or release any non-native species into areas of native habitat, suitable habitat, and natural or artificial waterways/ water bodies containing native species. All activity work areas will be kept free of trash and debris. Particular attention will be paid to "micro-trash" (including such small items as screws, nuts, washers, nails, coins, rags, small electrical components, small pieces of plastic, glass or wire, and any debris or trash that is colorful or shiny) and organic waste that may subsidize predators. All trash will be covered, kept in closed containers, or otherwise removed from the project site at the end of each day or at regular intervals prior to periods when workers are not present at the site. In addition to implementing the measures above on activity sites, each activity would provide compensatory mitigation that contributes to LUPA-wide raven management.	A Raven Management Plan (POD Appendix J) will detail methods to implement subsidizing predator standards in accordance with LUPA-BIO-6 and will meet requirements established by the USFWS and CDFW. The Project will comply with this CMA.
Restoration of Areas Disturbed by Construction Activities But Not Converted by Long-Term Disturbance	**LUPA-BIO-7**	Where DRECP vegetation types or Focus or BLM Special Status Species habitats may be affected by ground- disturbance and/or vegetation removal during pre-construction, construction, operations, and decommissioning related activities but are not converted by long-term (i.e., more than two years of disturbance, see Glossary of Terms) ground disturbance, restore these areas following the standards, approved by BLM authorized officer, following the most recent BLM policies and procedures for the vegetation	The solar and energy storage facility will avoid desert dry wash woodland with a 200-foot buffer. A Revegetation and Salvage Plan (POD Appendix L) will be prepared to address habitat restoration, local genetically appropriate seed, and cacti and crucifixion thorn salvage, as needed. The Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		community or species habitat disturbance/impacts as appropriate, summarized below: ■ Implement site-specific habitat restoration actions for the areas affected including specifying and using: – The appropriate seed (e.g., certified weed-free, native, and locally and genetically appropriate seed) – Appropriate soils (e.g., topsoil of the same original type on site or that was previously stored by soil type after being salvaged during excavation and construction activities) – Equipment – Timing (e.g., appropriate season, sufficient rainfall) – Location – Success criteria – Monitoring measures – Contingency measures, relevant for restoration, which includes seeding that follows BLM policy when on BLM administered lands. – Salvage and relocate cactus, nolina, and yucca from the site prior to disturbance using BLM protocols. To the maximum extent practicable for short-term disturbed areas, the cactus and yucca will be re-planted back to the original site. ■ Restore and reclaim short-term disturbed areas, including pipelines, transmission projects, staging areas, and short-term construction-related roads immediately, or during the most biologically appropriate season as determined in the activity/project specific environmental analysis and decision following completion of construction activities to reduce the amount of habitat converted at any one time and promote recovery to natural habitats and vegetation as well as climate refugia and ecosystem services such carbon storage.	
General Closure and Decommissioning Standards	**LUPA-BIO-8**	All activities that are required to close and decommission the site (e.g., renewable energy activities) will specify and implement project-specific closure and decommissioning actions that meet the approval of BLM, and that at a minimum address the following: ■ Specifying and implementing the methods, timing (e.g., criteria for triggering closure and decommissioning actions), and criteria for success (including quantifiable and measurable criteria). ■ Recontouring of areas that were substantially altered from their original contour or gradient and installing erosion control measures in disturbed areas where potential for erosion exists. ■ Restoring vegetation as well as soil profiles and functions that will support and maintain native plant communities, associated carbon sequestration and nutrient cycling processes, and native wildlife species.	A draft Closure and Decommissioning Plan has been developed (POD Appendix Y). The decommissioning plan will be finalized when the Project is near the end of its permit. The Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		■ Vegetation restoration actions will identify and use native vegetation composition, native seed composition, and the diversity to values commensurate with the natural ecological setting and climate projections.	
Water and Wetland Dependent Species Resources	**LUPA-BIO-9**	Implement the following general LUPA CMA for water and wetland dependent resources: ■ Implement construction site standard practices to prevent toxic chemicals, hazardous materials, and other fluids from entering vegetation type streams, washes, and tributary networks through water runoff, erosion, and sediment transport by, at a minimum, implementing the following: – On project sites, vehicles and other equipment will be maintained in proper working condition and only stored in designated containment areas where runoff is collected or controlled and that are located outside of streams, washes, and distributary networks to minimize accidental fluids and hazardous materials spills. – Hazardous material leaks, spills, or releases will be immediately cleaned and equipment will be repaired upon identification. Removal and disposal of spill and related clean-up materials will occur at an approved off-site landfill. – Maintenance and operations vehicles will carry the appropriate equipment and materials to isolate, clean up, and repair any hazardous material leaks, spills, or releases. ■ Activity-specific drainage, erosion, and sedimentation control actions, which meet the approval of BLM and the applicable regulatory agencies, will be carried out during all appropriate phases of the approved project. These actions, as needed, will address measures to ensure the proper protection of water quality, site-specific stormwater and sediment retention, and design of the project to minimize site disturbance, including the following: – Identify site-specific surface water runoff patterns and implement measures to prevent excessive and unnatural soil deposition and erosion. – Implement measures to maintain natural drainages and to maintain hydrologic function in the event drainages are disturbed. – Reduce the amount of area covered by impervious surfaces through use of permeable pavement or other pervious surfaces. Direct runoff from impervious surfaces into retention basins. – Stabilize disturbed areas following grading in the manner appropriate to the soil type so that wind or water erosion is minimized. – Minimize irrigation runoff by using low or no irrigation native vegetation landscaping for landscaped retention basins. – Conduct regular inspections and maintenance of long-term erosion control measures to ensure long-term effectiveness. – Project applicants for sites that may affect intermittent and perennial streams, springs, swales, ephemeral washes, wetland vegetation, other	The Applicant will adhere to the specifics in the Hazardous Materials Management and Oil Spill Response Plan (POD Appendix W). Coupled with implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		DRECP water land covers, or sites occupied by aquatic or riparian focus and BLM Special-Status Species due to groundwater or surface water extraction will conduct hydrologic studies during project planning to determine the potential effect of groundwater and surface water extraction on the hydrologic unit. These studies will include both watershed effects as well as effects on perched, alluvial, and regional aquifers. Projects that are likely to affect groundwater resources in a manner that would result in substantial loss of riparian or wetland communities or habitat for riparian or aquatic Focus and BLM Special-Status Species are prohibited. – The use of evaporation ponds for water management will be avoided when the water could harm birds or other terrestrial wildlife due to constituents of concern present in the wastewater (e.g., selenium, hypersalinity, etc.). – Evaporation ponds will be configured to minimize attractiveness to shorebirds (e.g., maintain water depths over two feet; maintain steep slopes along edge; enclose evaporation ponds in long-term structures; or obscure evaporation ponds from view using materials that blend in with the natural surroundings). ■ Ramps that allow the egress of wildlife from ponds or other water management infrastructure will be installed.	
Standard Practices for Weed Management	**LUPA-BIO-10**	Consistent with BLM state and national policies and guidance, integrated weed management actions, will be carried out during all phases of activities, as appropriate, and at a minimum will include the following: ■ Thoroughly clean the tires and undercarriage of vehicles entering or reentering the project site to remove potential weeds. ■ Store project vehicles on site in designated areas to minimize the need for multiple washings whenever vehicles re-enter the project site. ■ Properly maintain vehicle wash and inspection stations to minimize the introduction of invasive weeds or subsidy of invasive weeds. ■ Closely monitor the types of materials brought onto the site to avoid the introduction of invasive weeds and non-native species. ■ Reestablish native vegetation quickly on disturbed sites. ■ Monitor and quickly implement control measures to ensure early detection and eradication of weed invasions to avoid the spread of invasive weeds and non-native species on site and to adjacent off-site areas. ■ Use certified weed-free mulch, straw, hay bales, or equivalent fabricated materials for installing sediment barriers.	With the implementation of mitigation measures to be developed during the NEPA process, and as described in the Vegetation Management Plan (POD Appendix O) and Integrated Weed Management Plan (POD Appendix N), the Project will comply with this CMA.
Nuisance Animals and Invasive Species	**LUPA-BIO-11**	Implement the following CMAs for controlling nuisance animals and invasive species: ■ No fumigate, treated bait, or other means of poisoning nuisance animals including rodenticides will be used in areas where Focus and BLM Special-Status Species are known or suspected to occur.	The Applicant will apply to BLM for a Pesticide Use Permit prior to application of any pesticides on the Project site. In addition, with implementation of biological resources mitigation measures to be developed during the NEPA process,

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		■ Manage the use of widely spread herbicides and do not apply herbicides effective against dicotyledonous plants within 1,000 feet from the edge of a 100-year floodplain, stream and wash channels, and riparian vegetation or to soils less than 25 feet from the edge of drains. Exceptions will be made when targeting the base and roots of invasive riparian species such as tamarisk and Arundo donax (giant reed). Manage herbicides consistent with the most current national and California BLM policies. ■ Minimize herbicide, pesticide, and insecticide treatment in areas that have a high risk for groundwater contamination. ■ Clean and dispose of pesticide containers and equipment following professional standards. Avoid use of pesticides and cleaning containers and equipment in or near surface or subsurface water. ■ When near surface or subsurface water, restrict pesticide use to those products labeled safe for use in/near water and safe for aquatic species of animals and plants.	the Project will control nuisance animals and invasive species and comply with this CMA.
Noise	**LUPA-BIO-12**	For activities that may impact Focus or BLM Special Status Species, implement the following LUPA CMA for noise: ■ To the extent feasible, and determined necessary by BLM to protect Focus and BLM sensitive wildlife species, locate stationary noise sources that exceed background ambient noise levels away from known or likely locations of focus and BLM sensitive wildlife species and their suitable habitat. ■ Implement engineering controls on stationary equipment, buildings, and work areas including sound-insulation and noise enclosures to reduce the average noise level, if the activity will contribute to noise levels above existing background ambient levels. ■ Use noise controls on standard construction equipment including mufflers to reduce noise.	The only potential stationary noise source would be the battery energy storage system units, depending on technology. IP Easley, LLC, will implement noise control as appropriate with implementation of noise mitigation measures to be developed during the NEPA process. The Project will comply with this CMA.
General Siting and Design	**LUPA-BIO-13**	Implement the following CMA for project siting and design: ■ To the maximum extent practicable site and design projects to avoid impacts to vegetation types, unique plant assemblages, climate refugia as well as occupied habitat and suitable habitat for Focus and BLM Special-Status Species (see “avoid to the maximum extent practicable” in Glossary of Terms). ■ The siting of projects along the edges (i.e. general linkage border) of the biological linkages identified in Appendix D (Figures D-1 and D-2) will be configured (1) to maximize the retention of microphyll woodlands and their constituent vegetation type and inclusion of other physical and biological features conducive to Focus and BLM Special-Status Species’ dispersal, and (2) informed by existing available information on modeled focus and BLM Special-Status Species habitat and element occurrence data, mapped delineations of vegetation types, and based on available empirical data, including radio telemetry, wildlife tracking sign, and road-kill information. Additionally, projects will be sited and designed to	The Easley Project will avoid impacts to unique plant assemblages and climate refugia to the maximum extent practicable. That is, the solar and energy storage facility will avoid desert dry wash woodland with a 200-foot buffer and it is not located within a listed wildlife connectivity corridor. The Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		maintain the function of focus and BLM Special-Status Species connectivity and their associated habitats in the following linkage and connectivity areas: – Within a 5-mile-wide linkage across Interstate 10 centered on Wiley's Well Road to connect the Mule and McCoy mountains (the majority of this linkage is within the Chuckwalla ACEC and Mule-McCoy Linkage ACEC). – Within a 3-mile-wide linkage across Interstate 10 to connect the Chuckwalla and Palen mountains. – Within a 1.5-mile-wide linkage across Interstate 10 to connect the Chuckwalla Mountains to the Chuckwalla Valley east of Desert Center. – The confluence of Milpitas Wash and Colorado River floodplain within 2 miles of California State Route 78 (this linkage is entirely within the Chuckwalla ACEC). ■ Delineate the boundaries of areas to be disturbed using temporary construction fencing and flagging prior to construction and confine disturbances, project vehicles, and equipment to the delineated project areas to protect vegetation types and focus and BLM Special-Status Species. ■ Long-term nighttime lighting on project features will be limited to the minimum necessary for project security, safety, and compliance with Federal Aviation Administration requirements and will avoid the use of constant-burn lighting. ■ All long-term nighttime lighting will be directed away from riparian and wetland vegetation, occupied habitat, and suitable habitat areas for focus and BLM Special-Status Species. Long-term nighttime lighting will be directed and shielded downward to avoid interference with the navigation of night-migrating birds and to minimize the attraction of insects as well as insectivorous birds and bats to project infrastructure. ■ To the maximum extent practicable (see Glossary of Terms), restrict construction activity to the use existing roads, routes, and utility corridors to minimize the number and length/size of new roads, routes, disturbance, laydown, and borrow areas. ■ To the maximum extent practicable (see Glossary of Terms), confine vehicular traffic to designated open routes of travel to and from the project site, and prohibit, within project boundaries, cross-country vehicle and equipment use outside of approved designated work areas to prevent unnecessary ground and vegetation disturbance. ■ To the maximum extent practicable (see Glossary of Terms), construction of new roads and/or routes will be avoided within focus and BLM Special-Status Species suitable habitat within identified linkages for those focus and BLM Special-Status Species, unless the new road and/or route is beneficial to minimize net impacts to natural or ecological resources of concern. These areas will have a goal of "no net gain" of project roads and/or routes.	

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		■ To the maximum extent practicable (see Glossary of Terms), any new road and/or route considered within focus and BLM Special-Status Species suitable habitat within identified linkages for those focus and BLM Special-Status Species will not be paved so as not to negatively affect the function of identified linkages. ■ Use nontoxic road sealants and soil stabilizing agents.	
Biology: General Standard Practices	**LUPA-BIO-14**	Implement the following general standard practices to protect Focus and BLM Special-Status Species: ■ Feeding of wildlife, leaving of food or trash as an attractive nuisance to wildlife, collection of native plants, or harassing of wildlife on a site is prohibited. ■ Any wildlife encountered during the course of an activity, including construction, operation, and decommissioning will be allowed to leave the area unharmed. ■ Domestic pets are prohibited on sites. This prohibition does not apply to the use of domestic animals (e.g., dogs) that may be used to aid in official and approved monitoring procedures/protocols, or service animals (dogs) under Title II and Title III of the American with Disabilities Act. ■ All construction materials will be visually checked for the presence of wildlife prior to their movement or use. Any wildlife encountered during the course of these inspections will be allowed to leave the construction area unharmed. ■ All steep-walled trenches or excavations used during the project will be covered, except when being actively used, to prevent entrapment of wildlife. If trenches cannot be covered, they will be constructed with escape ramps, following up-to-date design standards to facilitate and allow wildlife to exit, or wildlife exclusion fencing will be installed around the trench(s) or excavation(s). Open trenches or other excavations will be inspected by a designated biologist immediately before backfilling, excavation, or other earthwork. ■ Minimize natural vegetation removal through implementation of crush and drive or cut or mow vegetation rather than removing entirely.	As described in the Plan of Development and with the implementation of biological resources mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.
	LUPA-BIO-15	Use state-of-the-art, as approved by BLM, construction and installation techniques, appropriate for the specific activity/project and site, that minimize new site disturbance, soil erosion and deposition, soil compaction, disturbance to topography, and removal of vegetation.	Within the application area, the project has been designed to minimize impacts to sensitive habitat and resources to the extent feasible. With the implementation of biological resources mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.
Activity-Specific Bird and Bat CMAs	**LUPA-BIO-16**	For activities that may impact focus and BLM sensitive birds, protected by the Endangered Species Act (ESA) and/or Migratory Bird Treaty Act of 1918, and bat species, implement appropriate measures as per the most up-to-date BLM state and national policy and guidance, and data on birds and bats, including but not limited to activity-specific plans and actions. The goal of the activity-	Portions of the 34.5 kV medium voltage collector lines may be installed underground, and project design will reduce effects to birds and bats to the maximum extent feasible. A Project-specific Bird and Bat Conservation Strategy (BBCS),

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		specific bird and bat actions is to avoid and minimize direct mortality of birds and bats from the construction, operation, maintenance, and decommissioning of the specific activities. Activity-specific measures to avoid and minimize impacts may include, but are not limited to: ■ Siting and designing activities will avoid high bird and bat movement areas that separate birds and bats from their common nesting and roosting sites, feeding areas, or lakes and rivers. ■ For activities that impact bird and bat Focus and BLM Special-Status Species, during project siting and design, conducting monitoring of bird and bat presence as well as bird and bat use of the project site using the most current survey methods and best procedures available at the time. ■ Reusing or co-locating new transmission facilities and other ancillary facilities with existing facilities and disturbed areas to reduce habitat destruction and avoid additional collision risks. ■ Reducing bird and bat collision hazards by utilizing techniques such as unguyed monopole towers or tubular towers. Where the use of guywires is unavoidable, demarcate guywires using the best available methods to minimize avian species strikes. ■ When fencing is necessary, use bird and bat compatible design standards. ■ Using lighting that does not attract birds and bats or their prey to project sites including using non-steady burning lights (red, dual red and white strobe, strobe-like flashing lights) to meet Federal Aviation Administration requirements, using motion or heat sensors and switches to reduce the time when lights are illuminated, using appropriate shielding to reduce horizontal or skyward illumination, and avoiding the use of high-intensity lights (e.g., sodium vapor, quartz, and halogen). ■ Implementing a robust monitoring program to regularly check for wildlife carcasses, document the cause of mortality, and promptly remove the carcasses. ■ Incorporating a bird and bat use and mortality monitoring program during operations using current protocols and best procedures available at time of monitoring.	including a Nesting Bird Management Plan, is included in POD Appendix M. The Project will comply with this CMA.
Activity-Specific Bird and Bat CMAs	**LUPA-BIO-17**	For activities that may result in mortality to Focus and BLM Special–Status bird and bat species, a Bird and Bat Conservation Strategy (BBCS) will be prepared with the goal of assessing operational impacts to bird and bat species and incorporating methods to reduce documented mortality. The BBCS actions for impacts to birds and bats during these activities will be determined by the activity-specific bird and bat operational actions. The strategy shall be	A draft Project-specific Bird and Bat Conservation Strategy (BBCS) is included in POD Appendix M and with implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.

<table>
<tr><th colspan="4">DRECP CMAs - LUPA Wide</th></tr>
<tr><th>Category</th><th>CMA #</th><th>CMA Text</th><th>Comments</th></tr>
<tr><td></td><td></td><td>approved by BLM in coordination with USFWS, and CDFW as appropriate, and may include, but is not limited to:
■ Incorporating a bird and bat use and mortality monitoring program during operations using current protocols and best procedures available at time of monitoring.
■ Activity-specific operational avoidance and minimization actions that reduce the level of mortality on the populations of bird and bat species, such as:
– Use techniques that would minimize attraction of birds to hazardous situations that are mistaken to be or simulate natural habitats (e.g., bodies of water).
– Implement operational management techniques that minimize impacts to migratory birds during diurnal and seasonal cycles (e.g., positioning of heliostats to decrease surface area exposed to avian species).
– Evaluation and installation of the best available bird and bat detection and deterrent technologies available at the time of construction.</td><td></td></tr>
<tr><td>Other Riparian & Wetland Focus Species: Tehachapi Slender Salamander</td><td>LUPA-BIO-RIPWET-1</td><td>The riparian and wetland DRECP vegetation types and other features listed in Table 17 will be avoided to the maximum extent practicable, except for allowable minor incursions (see Glossary of Terms for “avoidance to the maximum extent practicable” and “minor incursion”) with the specified setbacks.
<table>
<tr><th>Riparian and Wetland Vegetation Types or Features</th><th>Setback[1]</th></tr>
<tr><td colspan="2">Riparian Vegetation Types[1]</td></tr>
<tr><td>Madrean Warm Semi-Desert Wash Woodland/Scrub</td><td>200 feet</td></tr>
<tr><td>Mojavean Semi-Desert Wash Scrub</td><td>200 feet</td></tr>
<tr><td>Sonoran-Coloradan Semi-Desert Wash Woodland/Scrub</td><td>200 feet</td></tr>
<tr><td>Southwestern North American Riparian Evergreen and Deciduous</td><td>0.25 miles</td></tr>
<tr><td>Southwestern North American Riparian/Wash Scrub</td><td>0.25 miles</td></tr>
<tr><td colspan="2">Wetland Vegetation Types[1]</td></tr>
<tr><td>Arid west freshwater emergent marsh</td><td>0.25 miles</td></tr>
<tr><td>Californian Warm Temperate Marsh/Seep</td><td>0.25 miles</td></tr>
<tr><td colspan="2">Other Riparian and Wetland Related Features</td></tr>
<tr><td>Managed Wetlands[2]</td><td>0.25 miles</td></tr>
<tr><td>Mojave River[3]</td><td>0.25 miles</td></tr>
<tr><td>Undifferentiated Riparian land cover[4]</td><td>200 feet</td></tr>
</table>
[1] Setbacks are measured from the edge of the mapped riparian or wetland vegetation or water feature per LUPA-BIO 3.</td><td>The riparian vegetation type on the Easley site is Sonoran-Coloradan Semi-Desert Wash Woodland (mapped as desert dry wash woodland). It will be avoided to the maximum extent feasible on BLM-administered lands with the exception of allowable minor incursion (see Glossary of Terms). Hydrologic function will be maintained. The Project will comply with this CMA.</td></tr>
</table>

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		[2] Setback is from managed wetlands including USFWS Refuges, state managed wetlands, and duck clubs in Imperial Valley. See specifications for the Salton Sea below. [3] Setback is measured from the edge of mapped riparian or edge of Federal Emergency Management Agency (FEMA) 100 year floodplain of the Mojave River, whichever is further from the center line of the Mojave River channel. [4] Undifferentiated "Riparian" land cover includes portions of major river courses (Mojave River and Colorado River) within the main channels where riparian vegetation groups were not mapped. For minor incursion (see "minor incursion" in the Glossary of Terms) to the DRECP riparian vegetation types, wetland vegetation types, or encroachments on the setbacks listed in Table 17, the hydrologic function of the avoided riparian or wetland communities will be maintained. Minor incursions in the riparian and wetland vegetation types or other features including the setbacks listed in Table 17 will occur outside of the avian nesting season, February 1 through August 31, or otherwise determined by BLM, USFWS, and CDFW if the minor incursion(s) is likely to result in impacts to nesting birds.	
BLM Special Status Riparian Bird Species	**LUPA-BIO-RIPWET-3**	For activities that occur within 0.25 mile of a riparian or wetland DRECP vegetation type and may impact BLM Special Status riparian and wetland birds species, conduct a pre-construction/activity nesting bird survey for BLM Special Status riparian and wetland birds according to agency-approved protocols. Based on the results of the nesting bird survey above, setback activities that are likely to impact BLM Special Status riparian and wetland bird species), including but not limited to pre-construction, construction and decommissioning, 0.25 miles from active nests of BLM Special-Status riparian and wetland bird species during the breeding season (February 1 through August 31 or otherwise determined by BLM, USFWS, and CDFW). For activities in these areas covered by this provision that occur during the breeding season and that last no longer than one week, nesting bird surveys may need to be repeated, as determined by BLM, in coordination with USFWS and CDFW, as appropriate. No pre-activity nesting bird surveys are necessary for activities occurring outside of the breeding season.	The Applicant will perform a pre-construction/activity nesting bird survey and will establish setbacks as necessary. With implementation of mitigation measures to be developed during the NEPA process and the Project-specific Bird and Bat Conservation Strategy (POD Appendix M), the Project will comply with this CMA.
Bat Species (BAT)	**LUPA-BIO-BAT-1**	Activities, except wind projects, will not be sited within 500 feet of any occupied maternity roost or presumed occupied maternity roost as described below. Refer to CMA DFA-VPL-BIO-BAT-1 for distances within DFAs and VPLs.	No active bat maternity roosts have been identified within the survey area; no caves or similar roosting habitat occurs on or near the site. The Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
Plant Species (PLANT): Plant Focus and BLM Special Status Species CMAs	**LUPA-BIO-PLANT-1**	Conduct properly timed protocol surveys in accordance with the BLM's most current (at time of activity) survey protocols for plant Focus and BLM Special Status Species.	Protocol surveys have been completed. The methodologies and results are included in the Biological Resources Technical Report. The Project will comply with this CMA.
Special Vegetation Features (SVF)	**LUPA-BIO-SVF-1**	For activity-specific NEPA analysis, a map delineating potential sites and habitat assessment of the following special vegetation features is required: Yucca clones, creosote rings, Saguaro cactus, Joshua tree woodland, microphyll woodland, Crucifixion thorn stands. BLM guidelines for mapping/surveying cactus, yuccas, and succulents shall be followed.	Protocol surveys have been performed, which mapped these features as observed within the survey area, including desert dry wash microphyll woodland and creosote rings. No Joshua tree woodland, Saguaro cactus, or crucifixion thorn stands with greater than 100 individuals were found. The survey results and mapping are included in the Biological Resources Technical Report. The Project will comply with this CMA.
	LUPA-BIO-SVF-6	Microphyll woodland: impacts to microphyll woodland (see Glossary of Terms) will be avoided, except for minor incursions (see Glossary of Terms).	The riparian vegetation type on the site is the Sonoran-Coloradan Semi-Desert Wash Woodland (mapped as desert dry wash woodland). Desert dry wash woodland will be avoided with a 200-foot buffer on BLM administered land. The Project will comply with this CMA.
General Vegetation Management (VEG)	**LUPA-BIO-VEG-1**	Management of cactus, yucca, and other succulents will adhere to current up-to-date BLM policy.	Data collected during field surveys has mapped all cactus, yucca, and succulent occurrences in the Biological Resources Technical Report. The Applicant will comply with this CMA if cactus, yucca, and other succulents are found on the site.
	LUPA-BIO-VEG-2	Promote appropriate levels of dead and downed wood on the ground, outside of campground areas, to provide wildlife habitat, seed beds for vegetation establishment, and reduce soil erosion, as determined appropriate on an activity-specific basis.	The Applicant will allow appropriate levels of wood on the ground taking into consideration that it is a solar project and vegetation must be cleared to a certain extent. The Project will comply with this CMA.
	LUPA-BIO-VEG-3	Allow for the collection of plant material consistent with the maintenance of natural ecosystem processes.	Prior to Project fencing, plant material could be collected as necessary. After fencing, this CMA is not feasible within the solar facility fenceline. The Project will comply with this CMA prior to the fencing of the site.
	LUPA-BIO-VEG-5	All activities will follow applicable BLM state and national regulations and policies for salvage and transplant of cactus, yucca, other succulents, and BLM Sensitive plants.	No BLM sensitive plants have been identified on the site. Data collected during field surveys has been mapped in the Biological Resources Technical Report and includes all cactus, yucca, and succulent occurrences. The Applicant will comply with this CMA if cacti, yucca, and/or other succulents require salvage and transplantation.
	LUPA-BIO-VEG-6	BLM may consider disposal of succulents through public sale, as per current up-to-date state and national policy.	Resource occurs on the project site. BLM may consider disposal of succulents through public sale, as per current up-to-date state and national policy.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
Individual Focus Species (IFS): Desert Tortoise	**LUPA-BIO-IFS-1**	Activities within desert tortoise linkages, identified in Appendix D, that may have a negative impact on the linkage will require an evaluation, in the environmental document(s), of the effects on the maintenance of long- term viable desert tortoise populations within the affected linkage. The analysis will consider the amount of suitable habitat, including climate refugia, required to ensure long-term viability within each linkage given the linkage's population density, long-term demographic and genetic needs, degree of existing habitat disturbance/impacts, mortality sources, and most up-to-date population viability modeling. Activities that would compromise the long-term viability of a linkage population or the function of the linkage, as determined by the BLM in coordination with USFWS and CDFW, are prohibited and will require reconfiguration or re-siting.	The Easley solar facility footprint is located within the Pinto Wash Desert Tortoise Linkages identified in DRECP Appendix D, but does not overlap the Area of Critical Environmental Concern within the linkage. Impacts to the Pinto Wash Desert Tortoise Linkage will be assessed within the Biological Resources Technical Report and in the Environmental Documents in compliance with the National Environmental Policy Act. Should the BLM, in coordination with USFWS and CDFW, determine the project compromises the long-term viability of a linkage population or the function of the linkage the project will require reconfiguration or re-siting to be located outside of the linkage. The Easley Project 500 kV gen-tie line would cross the Oberon site to connect into the Oberon Substation. Within the Oberon Project site, the 500 kV gen-tie line would cross a 1.5-mile-wide wildlife linkage that connects the Chuckwalla Mountains and the Chuckwalla Valley. Upon completion of construction, the gen-tie line would not impede desert tortoise movement within the linkage. The Project will comply with this CMA.
	LUPA-BIO-IFS-2	Construction of new roads and/or routes will be avoided to the maximum extent practicable (see Glossary of Terms) within desert tortoise habitat in tortoise conservation areas (TCAs) or tortoise linkages identified in Appendix D, unless the new road and/or route is beneficial to minimize net impacts to natural or ecological resources of concern for desert tortoise. TCAs and identified linkages should have the goal of "no net gain" of road density. Any new road considered within a TCA or identified linkage will not be paved and will be designed and sited in order to minimize the effect to the function of identified linkages or local desert tortoise populations and shall have a maximum speed limit of 25 miles per hour. Roads requiring the installation of long-term desert tortoise exclusion fencing for construction or operation will incorporate wildlife underpasses (e.g., culverts) to reduce population fragmentation	The Easley Project 500 kV gen-tie line would cross the Oberon site to connect into the Oberon Substation. Within the Oberon Project site, the Easley gen-tie line would be located within a portion of an identified linkage area and TCA that overlaps with critical habitat. The Easley Project will utilize existing access roads (e.g., BLM Open Route DC379) where feasible for construction of the gen-tie line. The Project will comply with this CMA
	LUPA-BIO-IFS-3	All culverts for access roads or other barriers will be designed to allow unrestricted access by desert tortoises and will be large enough that desert tortoises are unlikely to use them as shelter sites (e.g., 36 inches in diameter or larger). Desert tortoise exclusion fencing may be utilized to direct tortoise use of culverts and other passages.	If culverts are needed in areas where desert tortoise would access, the Applicant will follow this CMA. Desert tortoise fence and shade structures will be utilized during construction. The Project will comply with this CMA.
	LUPA-BIO-IFS-4	In areas where protocol and clearance surveys are required (see Appendix D), prior to construction or commencement of any long-term activity that is likely to adversely affect desert tortoises, desert tortoise exclusion fencing shall be	Desert tortoise protocol surveys have been performed, desert tortoise fence installation will occur prior to construc-

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		installed around the perimeter of the activity footprint (see Glossary of Terms) in accordance with the Desert Tortoise Field Manual (USFWS, 2009) or most up-to-date USFWS protocol. Additionally, short-term desert tortoise exclusion fencing will be installed around short-term construction and/or activity areas (e.g., staging areas, storage yards, excavations, and linear facilities), as appropriate, per the Desert Tortoise Field Manual (USFWS, 2009) or most up-to-date USFWS protocol. ■ Exemption from desert tortoise protocol survey requirements can be obtained from BLM, in coordination with USFWS, and CDFW as applicable, on a case-by-case basis if a designated biologist determines the activity site does not contain the elements of desert tortoise habitat, is unviable for occupancy, or if baseline studies inferred absence during the current or previous active season. ■ Construction of desert tortoise exclusion fences will occur during the time of year when tortoise are less active in order to minimize impacts and to accommodate subsequent desert tortoise surveys. Any exemption or modification of desert tortoise exclusion fencing requirements will be based on the specifics of the activity and the site-specific population and habitat parameters. Sites with low population density and disturbed, fragmented, or poor habitat are likely to be candidates for fencing requirement exemptions or modifications. Substitute measures, such as on-site biological monitors in the place of the fencing requirement, may be required, as appropriate. ■ After an area is fenced, and until desert tortoises are removed, the designated biologist is responsible for ensuring that desert tortoises are not being exposed to extreme temperatures or predators as a result of their pacing the fence. Remedies may include the use of shelter sites placed along the fence, immediate translocation, removal to a secure holding area, or other means determined by the BLM, USFWS, and CDFW, as applicable. ■ Modification or elimination of the above requirement may also be approved if the activity design will allow retention of desert tortoise habitat within the footprint. If such a modification is approved, modified protective measures may be required to minimize impacts to desert tortoises that may reside within the activity area. ■ Immediately prior to desert tortoise exclusion fence construction, a designated biologist (see Glossary of Terms) will conduct a clearance survey of the fence alignment to clear desert tortoises from the proposed fence line's path. ■ All desert tortoise exclusion fencing will incorporate desert tortoise proof gates or other approved barriers to prevent access of desert tortoises to work sites through access road entry points.	tion, and clearance surveys will be conducted after fence installation. The Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		■ Following installation, long-term desert tortoise exclusion fencing will be inspected for damage quarterly and within 48 hours of a surface flow of water due to a rain event that may damage the fencing. ■ All damage to long-term or short-term desert tortoise exclusion fencing will be immediately blocked to prevent desert tortoise access and repaired within 72 hours.	
	LUPA-BIO-IFS-5	Following the clearance surveys (see Glossary of Terms) within sites that are fenced with long-term desert tortoise exclusion fencing a designated biologist (see Glossary of Terms) will monitor initial clearing and grading activities to ensure that desert tortoises missed during the initial clearance survey are moved from harm's way. A designated biologist will inspect construction pipes, culverts, or similar structures: (a) with a diameter greater than 3 inches, (b) stored for one or more nights, (c) less than 8 inches aboveground and (d) within desert tortoise habitat (such as, outside the long-term fenced area), before the materials are moved, buried, or capped. As an alternative, such materials shall be capped before storing outside the fenced area or placing on pipe racks. Pipes stored within the long-term fenced area after completing desert tortoise clearance surveys will not require inspection.	With implementation of mitigation measures for biological monitoring to be developed during the NEPA process and the specifics in the Project-specific Desert Tortoise Protection and Translocation Plan (POD Appendix I), the Project will comply with this CMA.
	LUPA-BIO-IFS-6	When working in areas where protocol or clearance surveys are required (see Appendix D), biological monitoring will occur with any geotechnical boring or geotechnical boring vehicle movement to ensure no desert tortoises are killed or burrows are crushed.	Biological monitoring will occur with any geotechnical boring or geotechnical boring vehicle movement. The Project will comply with this CMA.
	LUPA-BIO-IFS-7	A designated biologist (see Glossary of Terms) will accompany any geotechnical testing equipment to ensure no tortoises are killed and no burrows are crushed.	A designated biologist will accompany any geotechnical testing equipment. The Project will comply with this CMA.
	LUPA-BIO-IFS-8	Inspect the ground under the vehicle for the presence of desert tortoise any time a vehicle or construction equipment is parked in desert tortoise habitat outside of areas fenced with desert tortoise exclusion fencing. If a desert tortoise is seen, it may move on its own. If it does not move within 15 minutes, a designated biologist may remove and relocate the animal to a safe location.	With implementation of mitigation measures to be developed during the NEPA process and the specifics in the Project-specific Desert Tortoise Protection and Translocation Plan, the Project will comply with this CMA.
	LUPA-BIO-IFS-9	Vehicular traffic will not exceed 15 miles per hour within the areas not cleared by protocol level surveys where desert tortoise may be impacted.	With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.
Bendire's Thrasher	**LUPA-BIO-IFS-11**	If Bendire's thrasher is present, conduct appropriate activity-specific biological monitoring (see Glossary of Terms) to ensure that Bendire's thrasher individuals are not directly affected by operations (i.e., mortality or injury, direct impacts on nest, eggs, or fledglings).	Conservation measures to avoid impacts to birds will be implemented during construction and operations. If Bendire's thrasher are observed during clearance surveys and construction, the Project will comply with this mitigation CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
Burrowing Owl	**LUPA-BIO-IFS-12**	If burrowing owls are present, a designated biologist (see Glossary of Terms) will conduct appropriate activity-specific biological monitoring (see Glossary of Terms) to ensure avoidance of occupied burrows and establishment of the 656 feet (200 meter) setback to sufficiently minimize disturbance during the nesting period on all activity sites, when practical.	Burrowing owls were found during the Easley surveys. With implementation of mitigation measures to be developed during the NEPA process and the Easley Wildlife Protection and Relocation Plan (POD Appendix K), the Project will comply with this CMA.
	LUPA-BIO-IFS-13	If burrows cannot be avoided on-site, passive burrow exclusion by a designated biologist (see Glossary of Terms) through the use of one-way doors will occur according to the specifications in Appendix D or the most up-to-date agency BLM or CDFW specifications. Before exclusion, there must be verification that burrows are empty as specified in Appendix D or the most up-to-date BLM or CDFW protocols. Confirmation that the burrow is not currently supporting nesting or fledgling activities is required prior to any burrow exclusions or excavations.	Burrowing owls were found during the Easley surveys. With implementation of mitigation to be developed during the NEPA process and the Easley Wildlife Protection and Relocation Plan (POD Appendix K), the Project will comply with this mitigation CMA.
	LUPA-BIO-IFS-14	Activity-specific active translocation of burrowing owls may be considered, in coordination with CDFW.	The Easley Project does not propose active translocation of burrowing owls. If burrowing owls are present on the sites, passive relocation may occur in conformance with CDFW Guidelines.
	LUPA-BIO-IFS-25	Cumulative loss of golden eagle foraging habitat within a 1 to 4 mile radius around active or alternative golden eagle nests (as identified or defined in the most recent USFWS guidance and/or policy) will be limited to less than 20%. See CONS-BIO-IFS-5 for the requirement in Conservation Lands.	The nearest golden eagle nests are located in the Chuckwalla Mtns (south of I-10) and in or near Joshua Tree National Park (northwest and northeast of the site). All these nests have substantial areas of protected foraging habitat surrounding them. The Project would not cause loss of foraging habitat within approximately 2 miles of any nest. It would contribute to some loss of foraging habitat between 2 and 4 miles of nest sites but given the potential area available for foraging, cumulative losses would be less than 20% to the available foraging habitat. The Project will comply with this CMA.
Compensation	**LUPA-BIO-COMP-1**	Impacts to biological resources, identified and analyzed in the activity specific environmental document, from activities in the LUPA Decision Area will be compensated using the standard biological resources compensation ratio, except for the biological resources and specific geographic locations listed as compensation ratio exceptions, specifics in CMAs LUPA-BIO-COMP-2 through -4, and previously listed CMAs. Compensation acreage requirements may be fulfilled through non-acquisition (i.e., restoration and enhancement), land acquisition (i.e., preserve), or a combination of these options, depending on the activity specifics and BLM approval/authorization. Compensation for the impacts to desert tortoise critical habitat will be in the same critical habitat unit as the impact (see Table 18). Compensation for impacts to desert tortoise will be in the same recovery unit as the impact. Refer to CMA LUPA-COMP-1 and 2 for the timing requirements for initiation or completion of compensation.	The Applicant will develop a proposed mitigation package to mitigate impacted biological resources that will be reviewed through the NEPA process. This includes any impacts to desert tortoise habitat, designated critical desert tortoise habitat (500 kV gen-tie line), desert tortoise linkage, and desert riparian woodland vegetation (minor incursion). Impacts to the Pinto Wash Desert Tortoise Linkage outside of ACEC designations are mitigated at the standard mitigation ratio. The Project will comply with this CMA.

<table>
<tr><th colspan="4">DRECP CMAs - LUPA Wide</th></tr>
<tr><th>Category</th><th>CMA #</th><th>CMA Text</th><th>Comments</th></tr>
<tr><td></td><td></td><td>Table 18. Compensation Ratios for the Impacts of Activities in the DRECP LUPA Decision Area
<table><tr><th>Standard</th><th colspan="2">Biological Resource Compensation Ratio Exceptions</th></tr><tr><td rowspan="5">1:1</td><td>Desert tortoise designated critical habitat</td><td>5:1 in same CH unit</td></tr><tr><td>Mohave ground squirrel (MGS): Key population centers</td><td>2:1</td></tr><tr><td>Flat-tailed horned lizard (FTHL)</td><td>RMS</td></tr><tr><td>Wetlands</td><td>2:1</td></tr><tr><td>Desert riparian woodland vegetation</td><td>5:1</td></tr><tr><td colspan="3">RMS = Flat-Tailed Horned Lizard Rangewide Management Strategy</td></tr></table></td><td></td></tr>
<tr><td></td><td>LUPA-BIO-COMP-2</td><td>Birds and Bats – The compensation for the mortality impacts to bird and bat Focus and BLM Special Status Species from activities will be determined based on monitoring of bird and bat mortality and a fee re-assessed every 5 years to fund compensatory mitigation. The initial compensation fee for bird and bat mortality impacts will be based on pre-project monitoring of bird use and estimated bird and bat species mortality from the activity. The approach to calculating the operational bird and bat compensation is based on the total replacement cost for a given resource, a Resource Equivalency Analysis. This involves measuring the relative loss to a population (debt) resulting from an activity and the productivity gain (credit) to a population from the implementation of compensatory mitigation actions. The measurement of these debts and gains (using the same “bird years” metric as described in Appendix D) is used to estimate the necessary compensation fee.

Each activity, as determined appropriate by BLM in coordination with USFWS, and CDFW as applicable, will include a monitoring strategy to provide activity-specific information on mortality effects on birds and bats in order to determine the amount and type of compensation required to offset the effects of the activity, as described above and in detail in Appendix D. Compensation may also be satisfied by non-restoration actions that reduce mortality risks to birds and bats (e.g., increased predator control and protection of roosting sites from human disturbance).

Compensation will be consistent with the most up to date Department of the Interior (DOI) mitigation policy.</td><td>The Project will create and implement an agency-approved Bird and Bat Conservation Strategy that will consider the actions addressed here (see POD Appendix M). Implementation of the Project-specific Bird and Bat Conservation Strategy will comply with this CMA.</td></tr>
<tr><td colspan="4">Air Resources</td></tr>
<tr><td>Air Resources</td><td>LUPA-AIR-1</td><td>All activities must meet the following requirements:
■ Applicable National Ambient Air Quality Standards (Section 109)
■ State Implementation Plans (Section 110)</td><td>The Project will comply with this CMA and meet all federal, state, and local laws and regulations.</td></tr>
</table>

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		■ Control of Pollution from Federal Facilities (Section 118) including non-point source ■ Prevention of Significant Deterioration, including visibility impacts to mandatory Federal Class I Areas (Section 160 et seq.) ■ Conformity Analyses and Determinations (Section 176[c]) ■ Apply best management practices on a case-by-case basis ■ Applicable local Air Quality Management Jurisdictions (e.g., 403 SCAQMD)	
Air Resources	**LUPA-AIR-2**	Because project authorizations are a federal undertaking, air quality standards for fugitive dust may not exceed local standards and requirements.	With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.
Air Resources	**LUPA-AIR-3**	Where impacts to air quality may be significant under NEPA, requiring analysis through an Environmental Impact Statement, require documentation for activities to include a detailed discussion and analysis of Ambient Air Quality conditions (baseline or existing), National Ambient Air Quality Standards, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts and greenhouse gas emissions). This content is necessary to disclose the potential impacts from temporary or cumulative degradation of air quality. The discussion will include a description and estimate of air emissions from potential construction and maintenance activities, and proposed mitigation measures to minimize net PM10 and PM2.5 emissions. The documentation will specify the emission sources by pollutant from mobile sources, stationary sources, and ground disturbance. A Construction Emissions Mitigation Plan will be developed.	With implementation of mitigation measures to be developed during the NEPA process and laid out in the Dust Control Plan (POD Appendix U), and as modeled in the Air Quality Emissions Report (POD Appendix S), the Project will comply with this CMA.
Air Resources	**LUPA-AIR-4**	Because fugitive dust is the number one source of PM10 and PM2.5 emissions in the Mojave and Sonoran Deserts, fugitive dust impacts to air quality must be analyzed for all activities/projects requiring an Environmental Impact Statement and Environmental Assessment. ■ The NEPA air quality analysis may include modelling of the sources of PM10 and PM2.5 that occur prior to construction and/or ground disturbance from the activity/project, and show the timing, duration and transport of emissions off site. When utilized, the modeling will also identify how the generation and movement of PM10 and PM2.5 will change during and after construction and/or ground disturbance of the activity/project under all activity/project specific NEPA alternatives. The BLM air resource specialist and Authorizing Officer will determine if modelling is required as part of the NEPA analysis based on estimated types and amounts of emissions.	With implementation of mitigation measures to be developed during the NEPA process and laid out in the Dust Control Plan (POD Appendix U), and as modeled in the Air Quality Emissions Report (POD Appendix S), the Project will comply with this CMA.
Air Resources	**LUPA-AIR-5**	A fugitive Dust Control Plan will be developed for all projects where the NEPA analysis shows an impact on air quality from fugitive dust.	With implementation of mitigation measures to be developed during the NEPA process and the Dust Control Plan (POD Appendix U), the Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
Cultural Resources and Tribal Interests			
Cultural Resources and Tribal Interests	**LUPA-CUL-3**	Identify places of traditional cultural and religious importance to federally recognized Tribes and maintain access to these locations for traditional use.	The intent of this CMA is accomplished through compliance with NEPA, EX13175, EX13007 and all other applicable laws, regulations, and policies. The Project will comply with this CMA.
Cultural Resources and Tribal Interests	**LUPA-CUL-4**	Design activities to minimize impacts on cultural resources including places of traditional cultural and religious importance to federally recognized Tribes.	The intent of this CMA is accomplished through compliance with NEPA, National Historic Preservation Act (NHPA), EX13175, EX13007 and all other applicable laws, regulations, and policies. The Project will comply with this CMA.
Cultural Resources and Tribal Interests	**LUPA-CUL-7**	Coordinate with visual resources staff to ensure VRM Classes consider cultural resources and tribal consultation to include landmarks of cultural significance to Native Americans (TCPs, trails, etc.).	The analysis of the VRM Classes will consider all applicable resources in the analysis. The Project will comply with this CMA.
Cultural Resources and Tribal Interests	**LUPA-CUL-8**	Conduct regular contact and consultation with federally recognized Tribes and individuals, consistent with statute, regulation and policy.	This is an agency requirement so would be fulfilled by BLM through compliance with NEPA, Section 106 of the NHPA, EX13175, and all other applicable laws, regulations, and policies. The Project will comply with this CMA
Cultural Resources and Tribal Interests	**LUPA-CUL-9**	Promote DRECP desert vegetation types/communities by avoiding them where possible, then use required compensatory mitigation, off-site mitigation, and other means to ensure Native American vegetation collection areas and practices are maintained.	This is accomplished through NEPA, EX13175 and EX13007 and all other applicable laws, regulations, and policies. The Project will comply with this CMA.
Cultural Resources and Tribal Interests	**LUPA-CUL-11**	Promote and protect desert microphyll woodland vegetation type/communi-ties to ensure Native American cultural values are maintained.	The intent of this CMA is accomplished through compliance with NEPA, EX13175, EX13007 and all other applicable laws, regulations, and policies. The Easley Project will avoid microphyll woodland except for minor incursion. The Project will comply with this CMA.
Lands and Realty			
Lands and Realty	**LUPA-LANDS-4**	Nonfederal lands within the boundaries of BLM LUPA land use allocations are not affected by the LUPA.	The Project parcels located on federal land are designated as DFA.
Lands and Realty	**LUPA-LANDS-5**	The MUCs used to determine land tenure in the CDCA Plan will be replaced by areas listed in the CMAs below.	The Project is located in a DFA and will comply with this CMA.
Lands and Realty	**LUPA-LANDS-8**	The CDCA Plan requirement that new transmission lines of 161kV or above, pipelines with diameters greater than 12 inches, coaxial cables for interstate communications, and major aqueducts or canals for interbasin transfers of water will be located in designated utility corridors, or considered through the plan amendment process outside of designated utility corridors, remains unchanged. The only exception is that transmission facilities may be located outside of designated corridors within DFAs without a plan amendment. This CMA does not apply the Bishop and Bakersfield RMPs.	The Project is located in a DFA and will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
Paleontology			
Paleontology	**LUPA-PALEO-1**	If not previously available, prepare paleontological sensitivity maps consistent with the Potential Fossil Yield Classification for activities prior to NEPA analysis.	Paleontological sensitivity maps have been included in POD Appendix F (Paleontological Resources Technical Report). The Project will comply with this CMA.
Paleontology	**LUPA-PALEO-2**	Incorporate all guidance provided by the Paleontological Resources Protection Act.	With implementation of paleontological resources mitigation measures to be developed during the NEPA process, the Project will comply with the CMA.
Paleontology	**LUPA-PALEO-3**	Ensure proper data recovery of significant paleontological resources where adverse impacts cannot be avoided or otherwise mitigated.	With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with the CMA.
Paleontology	**LUPA-PALEO-4**	Paleontological surveys and construction monitors are required for ground disturbing activities that require an EIS.	A paleontological survey has been performed for the Project and will implement mitigation measures (to be developed during the NEPA process) to require that a qualified paleontological monitor(s) will monitor all construction-related earth-moving activities in sediments determined to have a moderate (PFYC 3 or higher) sensitivity. The Project does not require an EIS but will nonetheless comply with this CMA.
Recreation			
Recreation and Visitor Services	**LUPA-REC-1**	Maintain, and where possible enhance, the recreation setting characteristics – physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls.	The Project is surrounded by recreational opportunities and by built environment, including existing and approved renewable energy projects. The Project would be located in a DFA and the area does not experience high levels of recreation. The Project would not maintain or enhance the setting but would be consistent with the existing setting and with the DFA designation
Recreation and Visitor Services	**LUPA-REC-6**	Limit signage to that necessary for recreation facility/area identification, interpretation, education and safety/regulatory enforcement.	The Project does not anticipate signs other than for temporary detours on existing access roads, if necessary. Signs would be limited to what is necessary. The Project will comply with this CMA.
Soil and Water Resources			
Soil and Water General	**LUPA-SW-1**	Stipulations or conditions of approval for any activity will be imposed that provide appropriate protective measures to protect the quantity and quality of all water resources (including ephemeral, intermittent, and perennial water bodies) and any associated riparian habitat (see biological CMAs for specific riparian habitat CMAs). The water resources to which this CMA applies will be identified through the activity-specific NEPA analysis.	With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with the CMA.
Soil and Water General	**LUPA-SW-2**	Buffer zones, setbacks, and activity limitations specifically for soil and water (ground and surface) resources will be determined on an activity/site-specific basis through the environmental review process, and will be consistent with the soil and water resource goals and objectives to protect these resources.	The Project will comply with this CMA and minimize long-term facilities in buffers or protected zones for soil and water resources.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		Specific requirements, such as buffer zones and setbacks, may be based, in part, on the results of the Water Supply Assessment defined below. In general, placement of long-term facilities within buffers or protected zones for soil and water resources is discouraged, but may be permitted if soil and water resource management objectives can be maintained.	
Soil and Water General	**LUPA-SW-3**	Where a seeming conflict between CMAs within or between resources arises, the CMA(s) resulting in the most resource protection apply.	No conflicts between CMAs have been identified for the Project.
Soil and Water General	**LUPA-SW-4**	Nothing in the "Exceptions" below applies to or takes precedence over any of the CMAs for biological resources.	The Project would comply with the CMAs for biological resources.
Groundwater Resources	**LUPA-SW-5**	Exceptions to any of the specific soil and water stipulations contained in this section, as well as those listed below under the subheadings "Soil Resources," "Surface Water," and "Groundwater Resources," may be granted by the authorized officer if the applicant submits a plan, or, for BLM-initiated actions, the BLM provides documentation, that demonstrates: ■ The impacts are minimal (e.g., no predicted aquifer drawdown beyond existing annual variability in basins where cumulative groundwater use is not above perennial yield and water tables are not currently trending downward) or can be adequately mitigated.	The CMA does not require actions but allows for some flexibility on how to comply with other CMAs.
Soil Resources	**LUPA-SW-6**	In addition to the applicable required governmental safeguards, third party activities will implement up-to-date standard industry construction practices to prevent toxic substances from leaching into the soil.	The Applicant will ensure that its third-party contractor adheres to LUPA-SW-6 and the specifics in Hazardous Materials Management and Oil Spill Response Plan (POD Appendix W). The Project will comply with this CMA.
	LUPA-SW-7	Prepare an emergency response plan, approved by the BLM contaminant remediation specialist, that ensures rapid response in the event of spills of toxic substances over soils.	A Health, Safety, and Noise Plan, which addresses emergency response is included in POD Appendix T. The Project will comply with this CMA.
	LUPA-SW-8	As determined necessary on an activity specific basis, prepare a site plan specific to major soil types present (≥5% of footprint or laydown surfaces) in Wind Erodibility Groups 1 and 2 and in Hydrology Soil Class D as defined by the USDA Natural Resource Conservation Service to minimize water and air erosion from disturbed soils on activity sites.	The Project will take the erosion potential into consideration during engineering to avoid areas of high erodibility or to minimize water and air erosion through the use of BMPs. No site-specific plan is required.
	LUPA-SW-9	The extent of desert pavement within the proposed boundary of an activity shall be mapped if it is anticipated that the activity may create erosional or ecologic impacts. Mapping will use the best available data and standards, as determined by BLM. Disturbance of desert pavement within the boundary of an activity shall be limited to the extent possible. If disturbance from an activity is likely to exceed 10% of the desert pavement mapped within the activity boundary, the BLM will determine whether the erosional and ecologic impacts of exceeding the 10% cap by the proposed amount would be insignificant and/or whether the activity should be redesigned to minimize desert pavement disturbance.	The Easley Project has small patches of mapped the desert pavement within the Project footprint and may disturb desert pavement. The extent that the Project could create erosional or ecological impacts will be evaluated in the NEPA document. Implementation of dust control and soil and water resources mitigation measures and compliance with the Project SWPPP would reduce erosion impacts related to disturbance of desert pavement. Biological resources mitigation would require compensation for habitat impacts including ensuring that the habitat value of the compensation lands is

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
			comparable to the impacts. With implementation of the mitigation measures to be developed during the NEPA process, the effects to desert pavement would be insignificant and meet CMA LUPA-SW-9. The Project would comply with this CMA.
	LUPA-SW-10	The extent of additional sensitive soil areas (cryptobiotic soil crusts, hydric soils, highly corrosive soils, expansive soils, and soils at severe risk of erosion) shall be mapped if it is anticipated that an activity will impact these resources. To the extent possible, avoid disturbance of desert biologically intact soil crusts, and soils highly susceptible to wind and water erosion.	The Project will comply with this CMA if sensitive soils are documented onsite.
	LUPA-SW-11	Where possible, side casting shall be avoided where road construction requires cut- and-fill procedures.	The Project will comply with this CMA and will avoid side casting where road construction requires cut-and-fill procedures.
	LUPA-SW-13	BLM will manage all riparian areas to be maintained at, or brought to, proper functioning condition.	The CMA is specific to BLM actions.
	LUPA-SW-16	The 100-year floodplain boundaries for any surface water feature in the vicinity of the project will be identified. If maps are not available from the Federal Emergency Management Agency (FEMA), these boundaries will be determined via hydrologic modeling and analysis as part of the environmental review process. Construction within, or alteration of, 100-year floodplains will be avoided where possible, and permitted only when all required permits from other agencies are obtained.	FEMA flood insurance rate maps have not been prepared for the Project site or surrounding lands and the site does not lie within a federally mapped floodplain. The Project will comply with this CMA.
Groundwater	**LUPA-SW-17**	An activity's groundwater extraction shall not contribute to exceeding the estimated perennial yield for the basin in which the extraction is taking place. Perennial yield is that quantity of groundwater that can be withdrawn from the groundwater basin without exceeding the long-term recharge of the basin or unreasonably affecting the basin's physical, chemical, or biological integrity. It is further clarified arithmetically below.	A Water Supply Assessment is included in POD Appendix P. Groundwater Monitoring and Reporting and any potential impacts to the Chuckwalla Valley Groundwater Basin will be addressed with implementation of mitigation measures to be developed during the NEPA process. The Project will comply with this CMA.
	LUPA-SW-18	Water extracted or consumptively used for the construction, operation, maintenance, or remediation of the project shall be solely for the beneficial use of the project or its associated mitigation and remediation measures, as specified in approved plans and permits.	The Project will comply with this CMA and follow all plan and permit stipulations regarding Project water use
	LUPA-SW-19	Water flow meters shall be installed on all extraction wells permitted by BLM.	The Project will comply with this CMA and install a water flow meter if a water well is drilled at the Project site and permitted by BLM.
	LUPA-SW-21	Consideration shall be given to design alternatives that maintain the existing hydrology of the site or redirect excess flows created by hardscapes and reduced permeability from surface waters to areas where they will dissipate by percolation into the landscape.	The Project would substantially maintain the existing hydrology of the area; minimal additional impermeable surfaces are proposed. Therefore, the Project would comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
	LUPA-SW-22	All hydrologic alterations shall be avoided that could reduce water quality or quantity for all applicable beneficial uses associated with the hydrologic unit in the project area, or specific mitigation measures shall be implemented that will minimize unavoidable water quality or quantity impacts, as determined by BLM in coordination with USFWS, CDFW, and other agencies, as appropriate. These beneficial uses may include municipal, domestic, or agricultural water supply; groundwater recharge; surface water replenishment; recreation; water quality enhancement; flood peak attenuation or flood water storage; and wildlife habitat.	With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with the CMA.
	LUPA-SW-23	A Water (Groundwater) Supply Assessment shall be prepared in conjunction with the activity's NEPA analysis and prior to an approval or authorization. This assessment must be approved by the BLM in coordination with USFWS, CDFW, and other agencies, as appropriate, prior to the development, extraction, injection, or consumptive use of any water resource. The purpose of the Water Supply Assessment is to determine whether over-use or over-draft conditions exist within the project basin(s), and whether the project creates or exacerbates these conditions. The Assessment shall include an evaluation of existing extractions, water rights, and management plans for the water supply in the basin(s) (i.e., cumulative impacts), and whether these cumulative impacts (including the proposed project) can maintain existing land uses as well as existing aquatic, riparian, and other water-dependent resources within the basin(s). This assessment shall identify: ■ All relevant groundwater basins or sub-basins and their relationships. ■ All known aquifers in the basin(s), including their dimensions, whether confined or unconfined, estimated hydraulic conductivity and transmissivity, groundwater surface elevations, and direction and movement of groundwater. ■ All surface water basin(s) related to water runoff, delivery, and supply, if different from the groundwater basin(s). ■ All sites of surface outflow (springs or seeps) contained within the basin(s), including historic sites. ■ All other surface water bodies in the basins(s), including rivers, streams, ephemeral washes/drainages, lakes, wetlands, playas, and floodplains. ■ The water requirements of the proposed project and the source(s) of that water. ■ An analysis demonstrating that water of sufficient quantity and quality is available from identified source(s) for the life of the project. ■ An analysis of potential project-related impacts on water quality and quantity needed for beneficial uses, reserved water rights, existing groundwater users, or habitat management within or down gradient of the groundwater basin within which the project would be constructed. ■ The above analyses shall be in the form of a numerical groundwater model. The model extent shall encompass the groundwater basin within which the	The Easley Project will complete a Water Supply Assessment. Per LUPA-SW-5, an exception to the CMA can be made if impacts are minimal; therefore, it is anticipated that the Water Supply Assessment satisfies this CMA and meets the intent of the DRECP resource management goals.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		project would be constructed, and any groundwater-dependent resources within or down gradient of that basin. The primary product of the Water Supply Assessment shall be a baseline water budget, which shall be established based on the best-available data and hydrologic methods for the identified basin(s). This water budget shall classify and describe all water inflow and outflow to the identified basin(s) or system using best-available science and the following basic hydrologic formula or a derivation: $P - R - E - T - G = \Delta S$ where P is precipitation and all other water inflow or return flow, R is surface runoff or outflow, E is evaporation, T is transpiration, G is groundwater outflow (including consumptive component of existing pumping), and ΔS is the change in storage. The volumes in this calculation shall be in units of either acre-feet per year or gallons per year. The water budget shall quantify the existing perennial yield of the basin(s). Perennial yield is defined arithmetically as that amount such that $P - R - E - T - G$ is greater than or equal to 0 Water use by groundwater-dependent resources is implicitly included in the definition of perennial yield. For example, in many basins the transpiration component (T) includes water use by groundwater-dependent vegetation. Similarly, groundwater outflow (G) includes discharge to streams, springs, seeps, and wetlands. If one or more budget components is altered, then one or more of the remaining components must change for the hydrologic balance to be maintained. For example, an increase in the consumptive component of groundwater pumping can lower the water table and reduce transpiration by groundwater-dependent vegetation. The groundwater that had been utilized by the groundwater-dependent vegetation would then be considered "captured" by groundwater pumping. Similarly, increased groundwater consumption can capture groundwater that discharges to streams, springs, seeps, wetlands and playas. These changes can occur slowly over time, and may require years or decades before the budget components are fully adjusted. Accordingly, the water/groundwater supply assessment requires that the best-available data and hydrologic methods be employed to quantify these budgets, and that groundwater consumption effects on groundwater-dependent ecosystems be identified and addressed. The Water Supply Assessment shall also address: ■ Estimates of the total cone of depression considering cumulative drawdown from all potential pumping in the basin(s), including the project, for the life of the project through the decommissioning phase ■ Potential to cause subsidence and loss of aquifer storage capacity due to groundwater pumping ■ Potential to cause injury to other water rights, water uses, and land owners ■ Changes in water quality and quantity that affect other beneficial uses	

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		■ Effects on groundwater dependent vegetation and groundwater discharge to surface water resources such as streams, springs, seeps, wetlands, and playas that could impact biological resources, habitat, or are culturally important to Native Americans ■ Additional field work that may be required, such as an aquifer test, to evaluate site specific project pumping impacts and if necessary, establish trigger points that can be used for a Groundwater Water Monitoring and Mitigation Plan ■ The mitigation measures required, if there are significant or potentially significant impacts on water resources include but are not limited to, the use of specific technologies, management practices, retirement of active water rights, development of a recycled water supply, or water imports	
	LUPA-SW-24	A Groundwater Monitoring and Reporting Plan, and Mitigation Action Plan shall be prepared to verify the Water Supply Assessment and adaptively manage water use as part of project operations. This plan shall be approved by BLM, in coordination with USFWS, CDFW, and other agencies as appropriate, prior to the development, extraction, injection, or consumptive use of any water resource. The quality and quantity of all surface water and groundwater used for the project shall be monitored and reported using this plan. Groundwater monitoring includes measuring the effects of a project's groundwater extraction on groundwater surface elevations, groundwater flow paths, changes to groundwater-dependent vegetation, and of aquifer recovery after project decommissioning. Surface water monitoring, if applicable, shall monitor for changes in the flows, water volumes, channel characteristics, and water quality as a result of a project's surface water use. Monitoring frequency and geographic scope and reporting frequency shall be decided on a project and site-specific basis and in coordination with the appropriate agencies that manage the water and land resources of the region. The geographic scope may include at the very least, all basins/sub-basins that potentially receive inflow from the basin where the proposed project may be sited, and all basins/sub-basins that may potentially contribute inflow to the basin where the proposed project is located. The plan shall also detail any mitigation measures that may be required as a result of the project. This plan and all monitoring results shall be made available to BLM. BLM will make the plan and results available to USFWS, CDFW, and other applicable agencies.	A Water Supply Assessment is included in POD Appendix P. Groundwater Monitoring and Reporting will be included in the mitigation measures developed during the NEPA process. The Project will comply with this CMA.
	LUPA-SW-25	Where groundwater extraction, in conjunction with other cumulative impacts in the basin, has potential to exceed the basin's perennial yield or to impact water resources, one or more "trigger points," or specified groundwater elevations in specific wells or surface water bodies, shall be established by BLM. If the groundwater elevation at the designated monitoring wells falls below the trigger point(s)(or exceeds the trigger pumping rate), additional mitigation measures, potentially including cessation of pumping, will be imposed.	Use of water will be considered during the NEPA process and if deemed appropriate, trigger points may be required. The Project will comply with this CMA if required after additional study.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
	LUPA-SW-26	Groundwater pumping mitigation shall be imposed if groundwater monitoring data indicate impacts on water-dependent resources that exceed those anticipated and otherwise mitigated for in the NEPA analysis and ROD, even if the basin's perennial yield is not exceeded. Water-dependent resources include riparian or phreatophytic vegetation, springs, seeps, streams, and other approved domestic or industrial uses of groundwater. Mitigation measures may include changes to pumping rates, volume, or timing of water withdrawals; coordinating and scheduling groundwater pumping activities in conjunction with other users in the basin; acquisition of project water from outside the basin; and/or replenishing the groundwater resource over a reasonably short timeframe. For permitted activities, permittees may also be required to contribute funds to basin-wide groundwater monitoring networks in basins such as those encompassed by the East Riverside DFA or in the Calvada Springs/South Pahrump Valley area, and to cooperate in the compilation and analysis of groundwater data.	A Water Supply Assessment is included in POD Appendix P. Groundwater Monitoring and Reporting and any potential impacts to the Chuckwalla Valley Groundwater Basin will be addressed with implementation of mitigation measures to be developed during the NEPA process. The Project will comply with this CMA.
	LUPA-SW-27	Water-conservation measures shall be required in basins where current groundwater demand is high and has the future potential to rise above the estimated perennial yield (e.g., Pahrump Valley). These measures may include the use of specific technology, management practices, or both. A detailed discussion and analysis of the effectiveness of mitigation measures must be included. Application of these measures shall be detailed in the Groundwater Water Monitoring and Mitigation Plan.	A Water Supply Assessment is included in POD Appendix P. Groundwater Monitoring and Reporting and any potential impacts to the Chuckwalla Valley Groundwater Basin will be addressed with implementation of mitigation measures to be developed during the NEPA process. The Project will comply with this CMA.
	LUPA-SW-30	Activities shall comply with local requirements for any long term or short-term domestic water use and wastewater treatment.	The Project will comply with this CMA by adhering to any applicable local requirements regarding domestic water use and wastewater treatment.
	LUPA-SW-31	The siting, construction, operation, maintenance, remediation, and abandonment of all wells shall conform to specifications contained in the California Department of Water Resources Bulletins #74-81 and #74-90 and their updates.	Should a well be drilled on the Project site, the Project will comply with this CMA and its stated specification.
	LUPA-SW-32	Colorado River hydrologic basin - The concepts, principles and general methodology used in the Colorado River Accounting Surface Method, as defined in U.S. Geological Survey Scientific Investigations Report 2008-5113 (USGS 2009), and existing and future updates or a similar methodology, are considered the best available data for assessing activity/project related ground water impacts in the Colorado River hydrologic basin. The best available data and methodology shall be used to determine whether activity/project-related pumping would result in the extracted water being replaced by water drawn from the Colorado River. If activity/project-related groundwater pumping results in the static groundwater level at the well being near (within 1 foot), equal to, or below the Accounting Surface in a basin hydrologically connected to the Colorado River, that consumption shall be considered subject to the Law of the River (Colorado River Compact of 1922 and amendments). In such	A Water Supply Assessment is included in POD Appendix P. Mitigation measures to be developed during the NEPA process will state that, if water for the Project is to be obtained from onsite wells, the Applicant shall develop a Colorado River Water Supply Plan to monitor groundwater extractions and prevent, replace, or mitigate Project impacts that deplete the PVMGB groundwater budget. Mitigation measures will include groundwater monitoring and mitigation. The Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
		circumstances, BLM shall require the applicant to offset or otherwise mitigate the volume of water causing drawdown below the Accounting Surface. Details of such mitigation measures and the right to the use of water shall be described in the Groundwater Water Monitoring and Mitigation Plan.	
	LUPA-SW-35	Stipulations for activities in the vicinity of Death Valley National Park, Joshua Tree National Park, or Mojave National Preserve: The NEPA for activities involving groundwater extraction that are in the vicinity of Death Valley National Park, Joshua Tree National Park, or the Mojave National Preserve shall analyze and address any potential impacts of groundwater extraction on Death Valley National Park, Joshua Tree National Park, or Mojave National Preserve. BLM will consult with the National Park Service on this process. The analysis or analyses shall include: ■ Potential impacts on the water balances of groundwater basins within these parks and preserves ■ A map identifying all potentially impacted surface water resources in the vicinity of the project, including a narrative discussion of the delineation methods used to discern those surface waters in the field ■ Any project-related modifications to surface water resources, both temporary and permanent ■ Analysis of any potential impacts on perennial streams, intermittent streams, and ephemeral drainages that could negatively impact natural riparian buffers ■ Impacts of any project proposed truncation, realignment, channelization, lining, or filling of surface water resources that could change drainage patterns, reduce available riparian habitat, decrease water storage capacity, or increase water flow velocity or sediment deposition, in particular where stormwater diverted around or through the project site is returned to natural drainage systems downslope of the project ■ Any potential indirect project-related causes of hydrologic changes that could exacerbate flooding, erosion, scouring, or sedimentation in stream channels ■ Alternatives and mitigation measures proposed to reduce or eliminate such impacts	The NEPA review will consider potential effects of groundwater pumping for the Project on nearby wells. The Project would not have an impact on surface or groundwater within Joshua Tree National Park, which is underlain by a different groundwater basin, the Pinto Valley Groundwater Basin.
Visual Resources Management			
Visual Resources Management	**LUPA-VRM-1**	Manage Visual Resources in accordance with the VRM classes shown on Figure 9.	Under the DRECP LUPA, the DFA where the Easley Project are located is classified as VRI Class IV, which allow for a high level of change. The Project will comply with this CMA.
Visual Resources Management	**LUPA-VRM-2**	Ensure that activities within each of the VRM Class polygons meets the VRM objectives described above, as measured through a visual contrast rating process.	Under the DRECP LUPA, the DFA where the Easley Project is located is classified as VRI Class IV, which allow for a high level of change. The NEPA analysis will consider the visual contrast rating process. The Project will comply with this CMA.

DRECP CMAs - LUPA Wide			
Category	**CMA #**	**CMA Text**	**Comments**
Visual Resources Management	**LUPA-VRM-3**	Ensure that transmission facilities are designed and located to meet the VRM Class objectives for the area in which they are located. New transmission lines routed through designated corridors where they do not meet VRM Class Objectives will require RMP amendments to establish a conforming VRM Objective. All reasonable effort must be made to reduce visual contrast of these facilities in order to meet the VRM Class before pursing RMP amendments. This includes changes in routing, using lattice towers (vs. monopole), color treating facilities using an approved color from the BLM Environmental Color Chart CC-001 (dated June 2008, as updated on April 2014, or the most recent version) (vs. galvanized) on towers and support facilities, and employing other BMPs to reduce contrast. Such efforts will be retained even if an RMP amendment is determined to be needed. Visual Resource BMPs that reduce adverse visual contrast will be applied in VRM Class conforming situations. For a reference of BMPs for reducing visual impacts see the "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands", available at http://www.blm.gov/style/medialib/blm/wo/MINERALS__REALTY__AND_RESOURCE_PROTECTION_/energy/renewable_references.Par.1568.File.dat/RenewableEnergyVisualImpacts_BMPs.pdf, or the most recent version of the document or BMPs for VRM, as determined by BLM.	Under the DRECP LUPA, the DFA where the Easley Project is located is classified as VRI Class IV, which allow for a high level of change. The Project will implement BMPs as necessary to comply with this CMA.

DRECP CMAs - Transmission			
Category	**CMA #**	**CMA Text**	**Comments**
Biological Resources			
Biological Resources	**LUPA-TRANS-BIO-1**	Where feasible and appropriate for resource protection, site transmission activities along roads or other previously disturbed areas to minimize new surface disturbance, reduce perching opportunities for the Common Raven, and minimize collision risks for birds and bats.	The Easley gen-tie line will be sited along disturbed areas using existing transmission line corridors and roads where available. The Easley gen-tie line will share the Oberon Project 500 kV line from the Oberon Substation to Red Bluff Substation. The Project will comply with this CMA.
	LUPA-TRANS-BIO-2	Flight diverters will be installed on all transmission activities spanning or within 1,000 feet of stream and wash channels, canals, ponds, and any other natural or artificial body of water. The type of flight diverter selected will be subject to approval by BLM, in coordination with USFWS and CDFW as appropriate, and will be based on the best available scientific and commercial data regarding the prevention of bird collisions with transmission and guy wires.	The Easley gen-tie lines would not cross any streams, larger wash channels, or other natural or artificial bodies of water. However, there are artificial water sources in the Project vicinity and the gen-tie line would cross many small washes and areas of desert dry wash woodland habitat that birds may use for shelter. The Project will comply with this CMA.
	LUPA-TRANS-BIO-4	Siting of transmission activities will be prioritized within designated utility corridors, where possible, and designed to avoid, where possible, and otherwise minimize and offset impacts to sand transport processes in	The gen-tie line will be sited along disturbed areas using existing transmission line corridors and roads where available. The

DRECP CMAs - Transmission			
Category	**CMA #**	**CMA Text**	**Comments**
		Aeolian corridors, rare vegetation alliances and Focus and BLM Special Status Species. Transmission substations will be sited to avoid Aeolian corridors, rare vegetation alliances, and sand-dependent Focus and BLM Special Status Species habitats.	Project substation yard is not within aeolian corridors. The Project will comply with this CMA.
Cultural Resources & Tribal Interests			
Cultural Resources & Tribal Interests	**LUPA-TRANS-CUL-1**	For transmission (and renewable energy) activities, require the applicant to pay all appropriate costs associated with the following processes, through the appropriate BLM funding mechanism: ■ All appropriate costs associated with the BLM's analysis of the DRECP geodatabase and other sources for cultural resources sensitivity. ■ All appropriate costs associated with preliminary sensitivity analysis. ■ All appropriate costs associated with the Section 106 process including the identification and defining of cultural resources. These costs may also include logistical, travel, and other support costs incurred by tribes in the consultation process. ■ All appropriate costs associated with updating the DRECP cultural resources geodatabase with project specific results.	The existing cost-recovery agreements meet the requirements of this CMA.
	LUPA-TRANS-CUL-2	Consistent and in compliance with the NHPA Programmatic Agreement, signed February 5, 2016, or the most up to date signed version – for transmission (and renewable energy) activities, a compensatory mitigation fee will be required within the LUPA Decision Area to address cumulative and some indirect adverse effects to historic properties. The mitigation fee will be calculated in a manner that is commensurate to the size and regional impacts of the project. Refer to the NHPA Programmatic Agreement for details regarding the mitigation fee.	This may be accomplished through mitigation measures developed through the Section 106 or NEPA process. The Project will comply with this CMA.
	LUPA-TRANS-CUL-3	For transmission (and renewable energy) activities, the management fee rate will be determined through the NHPA programmatic Section 106 consultation process that will be completed as part of the DRECP land use plan amendment.	This may be accomplished through mitigation measures developed through the Section 106 or NEPA process. The Project will comply with this CMA.
	LUPA-TRANS-CUL-4	For transmission (and renewable energy) activities, demonstrate that results of cultural resources sensitivity, based on the DRECP geodatabase, and other sources, are used as part of the initial planning pre-application process and to select of specific footprints for further consideration.	The CMA is an action to be taken by the BLM.
	LUPA-TRANS-CUL-5	For transmission (and renewable energy) activities, provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints.	A BLM Class III archaeological survey will be completed for the Easley Project and along the gen-tie line and access route prior to the NEPA review, which exceeds the requirements of this CMA. The Project will comply with this CMA.
	LUPA-TRANS-CUL-6	For transmission (and renewable energy) activities, provide justification in the application why the project considerations merit moving forward if the	Mitigation measures developed during the NEPA process will require reducing impacts of the Easley Project to cultural

DRECP CMAs - Transmission			
Category	**CMA #**	**CMA Text**	**Comments**
		specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM.	resources to the extent feasible. The Project will comply with this CMA.
	LUPA-TRANS-CUL-7	For transmission (and renewable energy) activities, complete the NHPA Section 106 Process as specified in 36 CFR Part 800, or via an alternate procedure, allowed for under 36 CFR Part 800.14 prior to issuing a ROD or ROW grant on any utility-scale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement.	NHPA Section 106 compliance will be completed consistent with the DRECP PA. Section 106 compliance will be completed prior to the issuance of a Decision Record for the Project. The Project will comply with this CMA.

DRECP CMAs - Compensation			
Category	**CMA #**	**CMA Text**	**Comments**
	LUPA-COMP-1	For third party actions, compensation activities must be initiated or completed within 12 months from the time the resource impact occurs (e.g. ground disturbance, habitat removal, route obliteration, etc. for construction activities; wildlife mortality, visual impacts, etc. due to operations). ■ BLM will determine, in the environmental analysis, the activity/project-level timing of the compensation (i.e., initiated, completed or a combination) based on the specific resources being impacted, and scope and content of the activity. ■ A 6-month extension may be authorized, subject to approval by the authorizing officer, dependent on the resources impacted and compensation due diligence of the project developer.	The Applicant will develop a comprehensive habitat mitigation package. The Project will comply with this CMA should a third-party action causing a resource impact occur during construction or operations.

DRECP CMAs - DFAs and VPLs			
Category	**CMA #**	**CMA Text**	**Comments**
Biological Resources			
Biological Resources: North American Warm Desert Dune and Sand Flats	**DFA-VPL-BIO-DUNE-1**	Activities in DFAs and VPLs, including transmission substations, will be sited to avoid dune vegetation (i.e., North American Warm Desert Dune and Sand Flats). Unavoidable impacts (see "unavoidable impacts to resources" in the Glossary of Terms) to dune vegetation will be limited to transmission projects, except transmission substations, and access roads that will be sited to minimize unavoidable impacts. ■ For unavoidable impacts (see "unavoidable impacts to resources" in the Glossary of Terms) to dune vegetation, the following will be required: – Access roads will be unpaved. – Access roads will be designed and constructed to be at grade with the ground surface to avoid inhibiting sand transportation.	The Easley Project does not include dune vegetation. The Project will comply with this CMA.

DRECP CMAs - DFAs and VPLs			
Category	**CMA #**	**CMA Text**	**Comments**
Individual Focus Species (IFS): Desert Tortoise	**DFA-VPL-BIO-IFS-1**	To the maximum extent practicable (see Glossary of Terms), activities will be sited in previously disturbed areas, areas of low-quality habitat, and areas with low habitat intactness in desert tortoise linkages and the Ord-Rodman TCA, identified in Appendix D.	The Easley Project is in a fragmented landscape north of the I-10 freeway and Oberon Project, south of the Desert Sunlight and Desert Harvest projects, near to rural residential communities, and abandoned and active agricultural land uses. Desert tortoise habitat rankings range from 0 to 0.7 according to the Nussear model which does not consider these Anthropogenic habitat effects. The site partially overlaps a multiple species linkage and Pinto Wash Desert Tortoise Linkage. The Project will comply with this CMA.
Fire Prevention/ Protection	**DFA-VPL-BIO-FIRE-1**	Implement the following standard practice for fire prevention/protection: ■ Implement site-specific fire prevention/protection actions particular to the construction and operation of renewable energy and transmission project that include procedures for reducing fires while minimizing the necessary amount of vegetation clearing, fuel modification, and other construction-related activities. At a minimum these actions will include designating site fire coordinators, providing adequate fire suppression equipment (including in vehicles), and establishing emergency response information relevant to the construction site.	With implementation of mitigation measures to be developed during the NEPA process and the Fire Management and Prevention Plan (POD Appendix V), the Project will comply with this CMA.
Biological Compensation	**DFA-VPL-BIO-COMP-1**	Impacts to biological resources from all activities in DFAs and VPLs will be compensated using the same ratios and strategies as LUPA-BIO-COMP-1 through 4, with the exception identified below in DFA-VPL-BIO-COMP-2.	The Project will comply with the standard ratio for new impacts to native habitat, pinto wash desert tortoise linkage, and will comply with the designated critical habitat ratio where applicable. The Project will comply with this CMA.
Cultural Resources and Tribal Interests			
	DFA-VPL-CUL-1	For renewable energy activities and transmission, require the applicant to pay all appropriate costs associated with the following processes, through the appropriate BLM funding mechanism: ■ All appropriate costs associated with the BLM's analysis of the DRECP geodatabase and other sources for cultural resources sensitivity. ■ All appropriate costs associated with preliminary sensitivity analysis. ■ All appropriate costs associated with the Section 106 process including the identification and defining of cultural resources. These costs may also include logistical, travel, and other support costs incurred by tribes in the consultation process. ■ All appropriate costs associated with updating the DRECP cultural resources geodatabase with project specific results.	The existing cost-recovery agreements meet this CMA.
	DFA-VPL-CUL-2	Consistent and in compliance with the NHPA Programmatic Agreement, signed February 5, 2016, or the most up to date signed version -for renewable energy activities and transmission, a compensatory mitigation fee will be required within the LUPA Decision Area to address cumulative and some indirect adverse effects to historic properties. The mitigation fee will be calculated in a manner that is commensurate to the size and regional	This may be accomplished through mitigation measures developed through the Section 106 or NEPA process. The Project will comply with this CMA.

DRECP CMAs - DFAs and VPLs			
Category	**CMA #**	**CMA Text**	**Comments**
		impacts of the project. Refer to the Programmatic Agreement for details regarding the mitigation fee.	
	DFA-VPL-CUL-3	For renewable energy activities and transmission, the management fee rate will be determined through the NHPA programmatic Section 106 consultation process that will be completed as part of the DRECP land use plan amendment.	This may be accomplished through mitigation measures developed through the Section 106 or NEPA process. The Project will comply with this CMA.
	DFA-VPL-CUL-4	For renewable energy activities and transmission, demonstrate that results of cultural resources sensitivity, based on the DRECP geodatabase, and other sources, are used as part of the initial planning pre-application process and to select of specific footprints for further consideration.	The CMA is an action to be taken by the BLM.
	DFA-VPL-CUL-5	For renewable energy activities and transmission, provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints.	A BLM Class III archaeological survey will be completed for the Easley Project prior to the NEPA review, which exceeds the requirements of this CMA. The Project will comply with this CMA.
	DFA-VPL-CUL-6	For renewable energy activities and transmission, provide justification in the application why the project considerations merit moving forward if the specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM.	Mitigation measures developed during the NEPA process will require reducing impacts of the Easley Project to cultural resources to the extent feasible. The Project will comply with this CMA.
	DFA-VPL-CUL-7	For renewable energy activities and transmission, complete the NHPA Section 106 Process as specified in 36 CFR Part 800, or via an alternate procedure, allowed for under 36 CFR Part 800.14 prior to issuing a ROD or ROW grant on any utility-scale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement.	NHPA Section 106 will be completed for the Project consistent with the DRECP PA Section 106 compliance will be completed prior to the issuance of a Decision Record for the Project. Mitigation measures developed during the NEPA process will require reducing impacts of the Easley Project to cultural resources to the extent feasible. The Project will comply with this CMA.
Visual Resources Management			
Visual Resources Management	**DFA-VPL-VRM-1**	Encourage development in a planned fashion within DFAs (e.g., similar to the planned unit development concept used for urban design—i.e., in-fill vs. scattered development, use of common road networks, Generator Tie Lines etc., use of similar support facility designs materials and colors etc.) to avoid industrial sprawl.	The Easley Project is located in close proximity to other renewable development and an existing electric substation. The Easley Project will share access roads and utilize existing roads to the extent feasible. In addition, the Easley Project will interconnect to the Oberon Substation and utilize the Oberon gen-tie line to the Red Bluff Substation. The Project will comply with this CMA.
	DFA-VPL-VRM-2	Development in DFAs and VPLs are required to incorporate visual design standards and include the best available, most recent BMPs, as determined by BLM (e.g. Solar, Wind, West Wide Energy Corridor, and Geothermal PEISs, the "*Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands*", and other programmatic BMP documents).	The Project will implement BMPs, as necessary, to comply with this CMA.

DRECP CMAs - DFAs and VPLs			
Category	**CMA #**	**CMA Text**	**Comments**
	DFA-VPL-VRM-3	**Required Visual Resource BMPs.** All development within the DFAs and VPLs will abide by the BMPs addressed in the most recent version of the document "*Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands",* or its replacement, including, but not limited to the following: ■ Transmission: – Color-treat monopoles Shadow Gray per the BLM Environmental Color Chart CC001 unless a more effective color choice is selected by the local Field Office VRM specialist. – Lattice towers and conductors will have non-specular qualities. – Lattice Towers will be located a minimum of 3/4 miles away from Key Observation Points such as roads, scenic overlooks, trails, camp-grounds, navigable rivers and other areas people tend to congregate and located against a landscape backdrop when topography allows. ■ Solar – Color treat all facilities Shadow Gray from the BLM Environmental Color Chart CC001 unless a more effective color is selected by the Field Office VRM specialist, including but not limited to: – Concentrated solar thermal parabolic trough panel backs – Solar power tower heliostats – Solar power towers – Cooling towers – Power blocks ■ Wind – Color treat all facilities Shadow Gray with the exception of the wind turbine and towers 200 vertical feet or more. ■ Night Sky – BMPs to minimize impacts to night sky including light shielding will be employed	The Project will implement BMPs, as necessary, to comply with this CMA.

DRECP CMAs - Development Focus Areas			
Category	**CMA #**	**CMA Text**	**Comments**
Renewable Energy	**DFA-RE-1**	In order to use the DRECP's BLM LUPA streamlined process for renewable energy in DFAs and transmission, project proponents must first consult with appropriate representatives of the Department of Defense to ensure the proposed renewable energy and/or transmission activity will not cause an unacceptable risk to national security. Refer to additional detail in LUPA Section IV.4 and Appendix E. Specifically, the following process will be implemented: ■ For renewable energy and transmission activities proposed in red areas (see Appendix E), the DRECP BLM LUPA streamlined process will not be available unless a letter is obtained from the Department of Defense Siting Clearing-house stating that military impacts have been mitigated.	The DRECP LUPA Appendix E states that solar PV present little to no conflict to military operations. The Project will comply with this CMA.

DRECP CMAs - Development Focus Areas

<table>
<tr><th>Category</th><th>CMA #</th><th>CMA Text</th><th>Comments</th></tr>
<tr><td></td><td></td><td>■ For renewable energy and transmission activities proposed in orange or yellow areas (see Appendix E), the DRECP BLM LUPA streamlined process will not be available until Department of Defense representatives at the regional level have been consulted and have been provided a minimum of 30 days to assess potential mission impacts. If the regional representatives conclude within the 30-day period that there is a significant possibility that a proposed activity presents an unacceptable risk to national security, the BLM will not streamline the proposed activity process and will require additional environmental analysis regarding Department of Defense impacts, unless a letter is obtained from the Department of Defense Siting Clearinghouse stating that military impacts have been mitigated.</td><td></td></tr>
<tr><td>Biological Resources</td><td>DFA-BIO-IFS-1</td><td>Conduct the following surveys as applicable in the DFAs as shown in Table 21.
Table 21. Individual Species DFA Survey Requirements
<table>
<tr><th>Species</th><th>DFA Survey Requirements</th></tr>
<tr><td colspan="2">Reptile</td></tr>
<tr><td>Desert tortoise</td><td>Protocol surveys in the desert tortoise habitat areas indicated in Appendix H.</td></tr>
<tr><td>Flat-tailed horned lizard</td><td>Protocol surveys as specified in the Rangewide Management Strategy (RMS).</td></tr>
<tr><td colspan="2">Bird</td></tr>
<tr><td>Bendire’s thrasher</td><td>Pre-construction nesting bird survey during breeding season (March 1 through September 30) in suitable habitat on and within 500 feet of construction zone.</td></tr>
<tr><td>Burrowing Owl</td><td>Breeding season surveys (February 1through August 31) per Burrowing Owl Guidelines (CDFG, 2012).
Clearance surveys (for direct take avoidance) no less than 14days prior to ground disturbance per Burrowing Owl Guidelines.</td></tr>
<tr><td>California condor</td><td>None.</td></tr>
<tr><td>Gila woodpecker</td><td>None.</td></tr>
<tr><td>Golden eagle</td><td>Pre-project golden eagle surveys and pre-construction risk assessment surveys in LUPA-BIO-IFS-28, if applicable as described in golden eagle CMAs below.</td></tr>
<tr><td>Swainson’s Hawk</td><td>Protocol surveys in the Antelope and Owens Valleys.</td></tr>
<tr><td colspan="2">Mammal</td></tr>
<tr><td>Desert bighorn sheep</td><td>None.</td></tr>
</table></td><td>Wildlife surveys have been completed as dictated in DFA-BIO-IFS-1 for the applicable species. The methodologies and surveys results are included in the Biological Resources Technical Report. The Project will comply with this CMA.</td></tr>
</table>

DRECP CMAs - Development Focus Areas

Category	CMA #	CMA Text	Comments
		Mohave ground squirrel: Clearance surveys in the Mohave ground squirrel habitat areas indicated in Appendix H. Protocol surveys in key population centers and linkages.	
	DFA-BIO-IFS-2	Implement the following setbacks shown below in **Table 22** as applicable in the DFAs.	The Project will comply, as applicable, with the setbacks listed in this CMA (see also mitigation measures developed during the NEPA process).

Table 22. Individual Species DFA Setback Requirements

Species	DFA Setbacks
Reptile	
Desert tortoise	None.
Flat-tailed horned lizard	None.
Bird	
Bendire's thrasher	Setback pre-construction, construction, and decommissioning, and other activities 500 feet from active nests.
Burrowing Owl	656 feet (200 meters) from active nesting sites.
California condor	Setback wind and transmission projects 5 miles from nest sites. Setback solar, geothermal, and other activities than may impact condors 1.5 miles from nest sites and out of direct line of site from nest sites.
Gila woodpecker	Setback pre-construction, construction, and decommissioning, and other activities that may impact the species 0.25 miles from suitable habitat during the breeding season (April 1 through July 31).
Golden eagle	Setback activities 1 mile from active or alternative nests within an active territory as described in LUPA-BIO-IFS-24.
Swainson's Hawk	0.5 miles from active nests.
Mammal	
Desert bighorn sheep	None.
Mohave ground squirrel	None.

DRECP CMAs - Development Focus Areas			
Category	**CMA #**	**CMA Text**	**Comments**
Desert Tortoise	**DFA-BIO-IFS-3**	Protocol surveys, as described in **DFA-BIO-IFS-1** and shown in **Table 21**, are required for development in the desert tortoise survey areas (see Appendix D). Based on the results of the protocol surveys the identified desert tortoises will be translocated, or the activity will be redesigned/relocated as described below: ■ If protocol surveys identify 35 or fewer desert tortoises in potential impact areas on an activity site, the USFWS and CDFW (for third party activities) will be contacted and provided with the protocol survey results and information necessary for the translocation of identified desert tortoises. Pre-construction and construction, and other activities will not begin until the clearance surveys for the site have been completed and the desert tortoises have been translocated. Translocation will be conducted in coordination with the USFWS and CDFW, as appropriate, per the protocols in the Desert Tortoise Field Manual (USFWS, 2009) and the most up-to-date USFWS protocol. ■ If protocol surveys identify an adult desert tortoise density (i.e., individuals 160 millimeters or more) of more than 5 per square mile or more than 35 individuals total on a project site, the project will be required to be redesigned, re-sited, or relocated to avoid and minimize the impacts of the activity on desert tortoise	The Project will comply with this CMA and the protocol survey requirements. Wildlife surveys have been completed. The methodologies and surveys results are included in the Biological Resources Technical Report.
Recreation	**DFA-REC-1**	Retain, to the extent possible, the identified recreation setting characteristics: physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls (see recreation setting characteristics matrix).	The Project is surrounded by recreational opportunities and by built environment, including existing and approved renewable energy projects. The Project would be located in a DFA and the area does not experience high levels of recreation. It would not maintain or enhance the setting but would be consistent with the existing setting and with the DFA designation.
	DFA-REC-4	When considering large-scale development in DFAs, retain to the extent possible existing, approved recreation activities.	The Project is in a DFA, but would not impact approved, recreation activities.
	DFA-REC-5	For displacement of dispersed recreation opportunities, commensurate compensation in the form of enhanced recreation operations, recreation facilities or opportunities will be required. If recreation displacement results in resource damage due to increased use in other areas, mitigate that damage through whatever measures are most appropriate as determined by the Authorized Officer.	The Project would not displace recreation opportunities as the Project area is infrequently used for recreation.
	DFA-REC-7	If designated vehicle routes are directly impacted by activities (includes modification of existing route to accommodate industrial equipment, restricted access or full closure of designated route, pull outs, and staging area's to the public, etc.), mitigation will include the development of alternative routes to allow for continued vehicular access with proper signage, with a similar recreation experience. In addition, mitigation will also include the construction of an "OHV touring route" which circumvents the activity area and allows for interpretive	The Project would close some existing open routes. These routes do not lead to a specific recreational area so alternative routes would not be feasible. However, the Applicant could contribute funds if necessary to enhancing an existing OHV touring route, such as within the Chuckwalla SRMA which would allow for a similar recreation experience. The Project will comply with this CMA.

DRECP CMAs - Development Focus Areas			
Category	**CMA #**	**CMA Text**	**Comments**
		signing materials to be placed at strategic locations along the new touring route, if determined to be appropriate by BLM.	
	DFA-LANDS-7	Transmission facilities are an allowable use and will not require a plan amendment within DFAs.	The gen-tie line would be located within a DFA and does not require a plan amendment
Visual Resources Management	**DFA-VRM-1**	Manage all DFAs as VRM Class IV to allow for industrial scale development. Employ best management practices to reduce visual contrast of facilities.	The Project will implement BMPs, as necessary, to comply with this CMA.
	DFA-VRM-2	Regional mitigation for visual impacts is required in DFAs . Mitigation is be based on the VRI class and the underlying visual values (scenic quality, sensitivity, and distance zone) for the activity area as it stands at the time the ROD is signed for the DRECP LUPA. Compensatory mitigation may take the form of reclamation of other BLM lands to maintain (neutral) or enhance (beneficial) visual values on VRI Class II and III lands. Other considerations may include acquisition of conservation easements to protect and sustain visual quality within the viewshed of BLM lands. The following mitigation ratios will be applied in DFAs: ■ VRI Class II 1:1 ratio ■ VRI Class III ½ (0.5): 1 ratio ■ VRI Class IV, no mitigation required Additional mitigation will be required where activities affect viewsheds of specially designated areas (e.g., National Scenic and Historic Trails).	The Project is located on land with VRI Class IV, so no mitigation is required. The Project will comply with this CMA.