Appendix CC

APPLICABILITY OF DRECP CONSERVATION AND MANAGEMENT ACTIONS

APPLICABILITY OF DRECP CONSERVATION AND MANAGEMENT ACTIONS

IP Easley I, LLC, IP Easley II, LLC, and IP Easley III, LLC (Applicant), has designed the Easley Renewable Energy Project (Project) to conform to the Desert Renewable Energy Conservation Plan (DRECP) Conservation and Management Actions (CMAs) to the maximum extent feasible and proposes to employ applicable construction- and operations-phase CMAs identified in the DRECP Record of decision (ROD) on U.S. Bureau of Land Management (BLM)–administered lands. Based on the identified location of the Project, CMAs under the DRECP that may be applicable to the solar Project include:

- *Land Use Plan Amendment (LUPA) Wide CMAs*, which are required for covered activities within the California Desert Conservation Area (CDCA) and DRECP plan area;
- *Development Focus Area (DFA) CMAs*, which are implemented in addition to LUPA-wide CMAs in the DFAs; and
- *Transmission CMAs*, which apply to transmission activities, including the Project's generation tie line;

The following DRECP CMAs would not be applicable to the Easley Project, because the Project would not be located on land under applicable designations:

- *Areas of Critical Environmental Concern (ACECs)*
- *Special Recreation Management Areas (SRMAs)*
- *California Desert National Conservation Lands*
- *Wildlife Allocations*
- *Extensive Recreation Management Areas (ERMAs)*
- *Unallocated BLM Land CMAs*

The following table lists the DRECP CMAs that would and would not be applicable to the proposed Project, and if appropriate, provides a brief explanation of why.

LUPA Wide

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
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 DRECP vegetation types, rare alliances, and special features (e.g., Aeolian sand transport resources, Joshua tree, microphyll woodlands, carbon sequestration characteristics, seeps, climate refugia) present using the most current information, data sources, and tools (e.g., DRECP land cover mapping, aerial photos, DRECP species models, and reconnaissance site visits) to identify suitable habitat (see Glossary of Terms) for Focus and BLM Special Status Species. If required by the relevant species specific CMAs, conduct any subsequent protocol or adequate presence/absence surveys to identify species occupancy status and a more detailed mapping of suitable habitat to inform siting and design considerations. If required by relevant species specific CMAs, conduct analysis of percentage of impacts to suitable habitat and modeled suitable habitat. ■ 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.	Yes		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.	Yes		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 desert vegetation types, including but not limited to those in the riparian or wetland vegetation groups (as defined by alliances within the vegetation type descriptions and mapped based on the vegetation type habitat assessments described in LUPA-BIO-1). ■ 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.	Yes		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.
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	Yes		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.

LUPA Wide

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
		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.			
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.	Yes		With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.
Subsidized Predators Standards	**LUPA-BIO-6**	Subsidized predator standards, approved by BLM, in coordination with the USFWS and CDFW, will be implemented during all appropriate phases of activities, including but not limited to renewable energy activities, to manage predator food subsidies, water subsidies, and breeding sites including the following: ■ 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 will provide compen-satory mitigation that contributes to LUPA-wide raven management.	Yes		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.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
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 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 (see Glossary of Terms), the cactus and yucca will be re-planted back to the original site. ■ Restore and reclaim short-term (i.e. 2 years or less, see Glossary of Terms) disturbed areas, including pipelines, transmission projects, staging areas, and short-term construction-related roads immediately or during the most biologically appropriate season as determined in the activity/project specific environmental analysis and decision, following completion of construction activities to reduce the amount of habitat converted at any one time and promote recovery to natural habitats and vegetation as well as climate refugia and ecosystem services such carbon storage.	Yes		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.
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 decom-missioning 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.	Yes		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.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**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 DRECP water land covers, or sites occupied by aquatic or riparian Focus and BLM Special Status Species due to groundwater or surface water extraction will conduct hydrologic studies during project planning to determine the potential effect of groundwater and surface water extraction on the hydrologic unit. These studies will include both watershed effects as well as effects on perched, alluvial, and regional aquifers. Projects that are likely to affect ground-water resources in a manner that would result in substantial loss of riparian	Yes		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.

LUPA Wide					
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		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.	Yes		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 fumigant, treated bait, or other means of poisoning nuisance animals including rodenticides will be used in areas where Focus and BLM Special Status Species are known or suspected to occur. ■ 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.	Yes		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, the Project will control nuisance animals and invasive species and comply with this CMA.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		▪ 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.			
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 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	Yes		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 maintain the function of F 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	Yes		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.A portion of the northwesternmost of the Project site overlaps a multi-species linkage area that runs between Joshua Tree National Park and is already impacted by Desert Harvest, Desert Sunlight, and existing agriculture in the area. Also, the eastern end of the 500 kV gen-tie line into the Oberon Project Substation overlaps the 1.5-mile-wide linkage to connect the Chuckwalla Mountains and the Chuckwalla Valley; however, operation of a gen-tie line would not impede wildlife movement. The Applicant will coordinate with the BLM and develop mitigation measures during the NEPA process, as needed, to ensure that the connectivity function and associated habitat including microphyll woodland in these areas will be maintained during construction. Long-term night lighting would be minimized to the maximum extent feasible and coordinated with the BLM. Project disturbance areas will be flagged prior to construction. The Project will use existing roads and shared infrastructure where feasible.

LUPA Wide					
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		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 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 ■ 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.	Yes		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 Wide					
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	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.	Yes		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 ESA and/or Migratory Bird Treaty Act of 1918, and bat species, implement appropriate measures as per the most up-to-date BLM state and national policy and guidance, and data on birds and bats, including but not limited to activity specific plans and actions. The goal of the activity -specific bird and bat actions is to avoid and minimize direct mortality of birds and bats from the construction, operation, maintenance, and decommissioning of the specific activities. 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	Yes		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), 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 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.	Yes		A draft Project-specific Bird and Bat Conservation Strategy (BBCS) is included in POD Appendix M and with imple-mentation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.

LUPA Wide

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
		■ 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 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. Known important Focus and BLM Special Status bird areas are: ■ Dry lakes and playas of the north Mojave region, which include China Lake, Koehn Lake, Harper Lake, and Searles Lake (as shown in the Audubon Important Bird Areas in Appendix D) ■ Antelope Valley (as shown in the Audubon Important Bird Areas in Appendix D) ■ Lower Colorado River Valley (as shown in the Audubon Important Bird Areas in Appendix D) ■ The Salton Sea and bordering areas including agricultural land of the Imperial Valley (as shown in the Audubon Important Bird Areas in Appendix D) ■ Documented avian movement corridors along the north slope of the San Gabriel and San Bernardino mountain ranges ■ Other regionally important seasonal use areas and migratory corridors identified in future studies or otherwise documented in the scientific literature over the term of the LUPA The following provides the DRECP vegetation type, and Focus and BLM Special Status Species biological CMAs to be implemented throughout the LUPA Decision Area. **Riparian and Wetland Vegetation Types and Associated Species (RIPWET)** <u>Riparian Vegetation Types</u> ■ Madrean Warm Semi-Desert Wash Woodland/Scrub ■ Mojavean Semi-Desert Wash Scrub ■ Sonoran-Coloradan Semi-Desert Wash Woodland/Scrub ■ Southwestern North American Riparian Evergreen and Deciduous Woodland ■ Southwestern North American Riparian/Wash Scrub <u>Wetland Vegetation Types</u> ■ Arid west freshwater emergent marsh ■ Californian Warm Temperate Marsh/Seep ■ North American Warm Desert Alkaline Scrub and Herb Playa and Wet Flat ■ Southwestern North American Salt Basin and High Marsh <u>Riparian and Wetland Bird Focus Species</u> ■ Willow Flycatcher ■ Southwestern Willow Flycatcher ■ Least Bell's Vireo ■ Western Yellow-billed Cuckoo ■ Yuma Clapper Rail			

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		■ California Black Rail ■ Tricolored Blackbird <u>Fish Focus Species</u> ■ Desert pupfish ■ Mohave Tui Chub ■ Owens Tui Chub ■ Owens Pupfish			
Other Riparian & Wetland Focus Species: Tehachapi Slender Salamander	**LUPA-BIO-RIPWET-1**	The riparian and wetland DRECP vegetation types and other features listed in **Table 17** will be avoided to the maximum extent practicable, except for allowable minor incursions (see Glossary of Terms for "avoidance to the maximum extent practicable" and "minor incursion") with the specified setbacks. 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.	Yes		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.
	LUPA-BIO-RIPWET-2	Hydrologic function of the following DRECP vegetation types will be maintained: North American Warm Desert Alkaline Scrub and Herb Playa and Wet Flat, Southwestern North American Salt Basin and High Marsh, and other undifferentiated wetland-related land covers (i.e., "Playa," "Wetland," and "Open Water").	No	Resource not found on the project site	None of these vegetation types are present on the Easley site.
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 mile from active nests Special Status during the breeding season (February 1 through August 31 or otherwise determined by BLM, USFWS and CDFW). For activities in areas covered by this provision that occur during the breeding season and that last longer than one week, nesting bird surveys may need to be repeated, as determined by BLM, in coordination with USFWS and CDFW, as appropriate. No pre-activity nesting bird surveys are necessary for activities occurring outside of the breeding season.	Yes		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.
Federally Listed Fish Species	**LUPA-BIO-RIPWET-4**	Setback pre-construction, construction, and decommissioning activities and other activities that may impact federally listed fish species, 0.25 mile from the edge of existing or newly discovered occurrences of federally listed fish species, except for minor incursions (see Glossary of Terms). ■ Demonstrate neutral or beneficial long-term hydrologic effects on federally listed fish species and the adjoining riparian and wetland habitat prior to seeking authorization for and commencing a minor incursion.	No	Resource not found on the project site	There are no fish species in the Project area or within 0.25 miles.
	LUPA-BIO-RIPWET-5	Site and design activities to fully avoid operational impacts to existing and newly discovered occurrences of federally listed fish species.	No	Resource not found on the project site	There are no fish species in the Project area.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
Tehachapi Slender Salamander	**LUPA-BIO-RIPWET-6**	Avoid pre-construction, construction, and decommissioning activities or other activities that may impact the Tehachapi slender salamander within 0.25 mile of existing or newly discovered occurrences of or suitable habitat for Tehachapi slender salamander, except for minor incursions (see Glossary of Terms).	No	Project not within the range or habitat of this species.	The Project area does not include Tehachapi slender salamander or their habitat.
	LUPA-BIO-RIPWET-7	Construct culverts or other suitable below-grade crossings for new or improved roadways that bisect suitable habitat for the Tehachapi Slender Salamander. ■ Construct barriers to reduce at-grade crossings along new or improved roadways that bisect suitable habitat.	No	Project not within the range or habitat of this species.	The Project area does not include Tehachapi slender salamander or their habitat.
Dune DRECP Vegetation Types, Aeolian Processes and Associated Species (DUNE): Aeolian Processes	**LUPA-BIO-DUNE-1**	Because DRECP sand dune vegetation types and Aeolian sand transport corridors are, by definition, shifting resources, activities that potentially occur within or bordering the sand dune DRECP vegetation types and/or Aeolian sand transport corridors must conduct studies to verify the location [refer to Appendix D, Figure D-7] and extent of the sand resource(s) for the activity-specific environmental analysis to determine: ■ Whether the proposed activity(s) occur within a sand dune or an Aeolian sand transport corridor ■ If the activity(s) is subject to dune/Aeolian sand transport corridor CMAs ■ If the activity(s) needs to be reconfigured to satisfy applicable avoidance requirements	No	Resource not found on the project site	There is no sand dune habitat or suitable habitat for sand-dependent species on the Easley site.
	LUPA-BIO-DUNE-2	Activities that potentially affect the amount of sand entering or transported within Aeolian sand transport corridors will be designed and operated to: ■ Maintain the quality and function of Aeolian transport corridors and sand deposition zones, unless related to maintenance of existing [at the time of the DRECP LUPA ROD] facilities/operations/activities ■ Avoid a reduction in sand-bearing sediments within the Aeolian system ■ Minimize mortality to DUNE associated Focus and BLM Special Status Species	No	Resource not found on the project site	There are no sand dune habitats or sand transport corridors on the Easley site.
	LUPA-BIO-DUNE-3	Any facilities or activities that alter site hydrology (e.g., sediment barrier) will be designed to maintain continued sediment transport and deposition in the Aeolian corridor in a way that maintains the Aeolian sorting and transport to downwind deposition zones. Site designs for maintaining this transport function must be approved by BLM in coordination with USFWS and CDFW as appropriate.	No	Resource not found on the project site	The Project is not located in an Aeolian corridor and it would be designed to allow sheet flow through the Project, maintaining the site hydrology and sediment transport to the maximum extent feasible.
Mohave Fringe-Toed Lizard	**LUPA-BIO-DUNE-4**	Dune formations and other sand accumulations (i.e., sand ramps, sand sheets) with suitable habitat characteristics for the Mojave fringe-toed lizard (i.e., unconsolidated blow-sand) will be mapped according to mapping standards established by the BLM National Operations Center. For minor incursions (see "minor incursion" in the Glossary of Terms) into sand dunes and sand transport areas the activity will be sited in the mapped zone with the least impacts to sand dunes and sand transport and Mojave fringe-toed lizards.	No	Resource not found on the project site	There are no sand dune formations on the Easley site. There is no Mojave fringe-toed lizard modeled habitat on the site.
	LUPA-BIO-DUNE-5	If suitable habitat characteristics are identified during the habitat assessment, clearance surveys (see Glossary of Terms) for Mojave fringe-toed lizard will be performed in suitable habitat areas. The following CMAs will be implemented for bat Focus and BLM Special Status Species, including but not limited to those listed below: ■ California Leaf-nosed Bat ■ Pallid Bat ■ Townsend's Big-eared Bat	No	Project not within the range or habitat of this species.	The Project site does not include habitat for Mojave fringe-toed lizards

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
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.	Yes		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.
	LUPA-BIO-BAT-2	Mines will be assumed to be occupied bat roosts, unless appropriate surveys for bat use have been conducted during all seasons (including maternity, lekking or swarming, and winter use). Mines not considered potential bat roosts are only those that have no structure/workings (adits or shafts or crevices out of view). The following CMAs will be implemented for all plant Focus and BLM Special Status Species, including but not limited to those listed below ■ Alkali mariposa-lily ■ Bakersfield cactus ■ Barstow woolly sunflower ■ Desert cymopterus ■ Little San Bernardino Mountains linanthus ■ Mojave monkeyflower ■ Mojave tarplant ■ Owens Valley checkerbloom ■ Parish's daisy ■ Triple-ribbed milk-vetch	No	Resource not found on the project site	There are no mines on or within 500 feet of the Project site, as dictated in CMA LUPA-BIO-BAT-1. Mines that occur within the Project vicinity with records of bat roosts are approxi-mately 20-30 miles away in the McCoy Mountains, the Little Maria Mountains, and the Pinto Mountains
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.	Yes		Protocol surveys have been completed. The methodologies and results are included in the Biological Resources Technical Report. The Project will comply with this CMA.
	LUPA-BIO-PLANT-2	Implement an avoidance setback of 0.25 mile for all Focus and BLM Special Status Species occurrences. Setbacks will be placed strategically adjacent to occurrences to protect ecological processes necessary to support the plant Species (see Appendix Q, Baseline Biology Report, in the Proposed LUPA and Final EIS [2015], or the most recent data and modeling).	No	Resource not found on the project site	No Focus or BLM Special Status Plant Species were observed, as is documented in the Biological Resources Technical Report.
	LUPA-BIO-PLANT-3	Impacts to suitable habitat for Focus and BLM Special Status plant species should be avoided to the extent feasible, and are limited [capped] to a maximum of 1% of their suitable habitat throughout the entire LUPA Decision Area. The baseline condition for measuring suitable habitat is the DRECP modeled suitable habitat for these species utilized in the EIS analysis (2014 and 2015), or the most recent suitable habitat modeling. ■ For those plants with Species Specific DFA Suitable Habitat Impact Caps listed in **Table 23**, those caps apply in the DFAs only. Refer to CMA DFA-PLANT-1.	No	Resource not found on the project site	None of the plant species identified in Table 23 have potential to occur on the Project site or in the vicinity. The Project will not affect suitable habitat for any of these species.
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.	Yes		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-2	Yucca clones larger than 3 meters in diameter (longest diameter if the clone forms an ellipse rather than a circular ring) shall be avoided.	No	Resource not found on the project site	Protocol surveys have been performed for the Easley Project and no yucca clones larger than 3 meters were found onsite.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	LUPA-BIO-SVF-3	Creosote bush rings (see Glossary of Terms) larger than 5 meters in diameter (longest diameter if the "ring" forms an ellipse rather than a circle) shall be avoided.	No	Resource not found on the project site	No creosote bush rings larger than 5 meters in diameter were observed during the biological resources surveys.
	LUPA-BIO-SVF-4	Saguaro cactus should be managed in such a way as to provide long-term habitat for the California populations not just individual plants, except in DFAs.	No	Resource not found on the project site	Protocol surveys have been performed for the Easley Project and no saguaro cactus were found onsite.
	LUPA-BIO-SVF-5	Joshua tree woodland (*Yucca brevifolia* Woodland Alliance): impacts to Joshua tree woodlands (see Glossary of Terms) will be avoided to the maximum extent practicable (see Glossary of Terms), except for minor incursions (see Glossary of Terms).	No	Resource not found on the project site	Protocol surveys have been performed for the Easley Project and no Joshua tree woodlands were found onsite.
	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).	Yes		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.
	LUPA-BIO-SVF-7	Crucifixion thorn stands: (*Castela emoryi* Shrubland Special Stands) Crucifixion thorn stands with greater than 100 individuals will be avoided.	No	Resource not found on the project site	Protocol surveys have been performed for the Easley Project and no crucifixion thorn stands with greater than 100 individuals were found onsite.
General Vegetation Management (VEG)	**LUPA-BIO-VEG-1**	Management of cactus, yucca, and other succulents will adhere to current up-to-date BLM policy.	Yes		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.	Yes		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.	Yes		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-4	Within the Bishop Field Office area, provide yearlong protection of endangered, threatened, candidate, and sensitive plant and animal habitats. Yearlong protection means that no discretionary actions which would adversely affect target resources will be allowed.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not within the Bishop Field Office area.
	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.	Yes		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.	Yes		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.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**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.	Yes		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 Cristial 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. ~~A portion of the northwesternmost area of the Project site includes a multi-species linkage that is not a TCA or within desert tortoise critical habitat and is already impacted by Desert Sunlight, Desert Harvest, and surrounding agricultural operations. The Applicant will coordinate with BLM to design the Project to maintain connectivity.~~ 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 to minimize the effect to the function of identified linkages or local desert tortoise populations and shall have a maximum speed limit of 25 miles per hour. Roads requiring the installation of long-term desert tortoise exclusion fencing for construction or operation will incorporate wildlife underpasses (e.g., culverts) to reduce population fragmentation.	Yes		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.	Yes		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 Wide

Category	CMA #	CMA Text	Applicability	Explanation: Why CMA is not Applicable	Comments
	LUPA-BIO-IFS-4	In areas where protocol and clearance surveys are required (see Appendix D), prior to construction or commencement of any long-term activity that is likely to adversely affect desert tortoises, desert tortoise exclusion fencing shall be installed around the perimeter of the activity footprint (see Glossary of Terms) in accordance with the Desert Tortoise Field Manual (USFWS 2009) or most up-to- date USFWS protocol. Additionally, short-term desert tortoise exclusion fencing will be installed around short-term construction and/or activity areas (e.g., staging areas, storage yards, excavations, and linear facilities), as appropriate, per the Desert Tortoise Field Manual (USFWS 2009) or most up-to-date USFWS protocol. ■ 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. ■ 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.	Yes		Desert tortoise protocol surveys have been performed, desert tortoise fence installation will occur prior to construction, and clearance surveys will be conducted after fence installation. The Project will comply with this CMA.
	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.	Yes		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 Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		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.			
	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.	Yes		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.	Yes		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.	Yes		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.	Yes		With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.
Flat-Tailed Horned Lizard	**LUPA-BIO-IFS-10**	Comply with the conservation goals and objectives, criteria, and management planning actions identified in the most recent revision of the Flat-tailed Horned Lizard Rangewide Management Strategy (RMS). Activities will include appropriate design features using the most current information from the RMS and RMS Interagency Coordinating Committee to minimize adverse impacts during siting, design, pre-construction, construction, operation, and decommissioning; ensure that current or potential linkages and habitat quality are maintained; reduce mortality; minimize other adverse impacts during operation; and ensure that activities have a neutral or positive effect on the species.	No	Project not within the range or habitat of this species.	The Easley Project is not within flat-tailed horned lizard range.
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).	Yes		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.
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.	Yes		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.	Yes		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 Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	LUPA-BIO-IFS-14	Activity-specific active translocation of burrowing owls may be considered, in coordination with CDFW.	Yes		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.
California Condor	**LUPA-BIO-IFS-15**	All activities will be designed and sited in a manner to avoid or minimize the likelihood of contact, injury, and mortality of California condors. If a condor is identified at a site, the BLM biological staff and USFWS will be immediately notified for guidance.	No	Project not within the range or habitat of this species.	The Project is not within California condor range or habitat.
	LUPA-BIO-IFS-16	Flight activity (e.g., surveys, construction, as well as operation and maintenance activities) related to any activities will not be allowed in the airspace extending to 3,000 feet above condor nest sites.	No	Project not within the range or habitat of this species.	The Project is not within California condor range or habitat.
	LUPA-BIO-IFS-17	In the range of the California condor, structures supported by guy wires will be marked with recom-mended bird deterrent devices at the appropriate spacing intervals.	No	Project not within the range or habitat of this species.	The Project is not within California condor range or habitat.
	LUPA-BIO-IFS-18	In the range of the California condor, all equipment and work-related materials that are potentially hazardous to condors, including but not limited to items that can be ingested, picked up, or carried away (e.g., loose-wires, open containers with fluids, some construction materials, etc.) will be kept in closed containers either in the work area or placed inside vehicles when they are not being used and at the end of every work day.	No	Project not within the range or habitat of this species.	The Project is not within California condor range or habitat.
	LUPA-BIO-IFS-19	In the range of the California condor, when feasible, ethylene glycol-based anti-freeze or other ethylene glycol-based liquid substances will be avoided, and propylene glycol-based antifreeze will be used. Vehicles and equipment using ethylene glycol based substances will be inspected before and after field use as well as during storage on sites for leaks and puddles. Standing fluid will be remediated without unnecessary delay.	No	Project not within the range or habitat of this species.	The Project is not within California condor range or habitat.
	LUPA-BIO-IFS-20	Activities that are determined to have a potential risk of taking condors will implement the best detect, deter, and curtailment strategy available at the time of the activity to minimize adverse effects, and avoid or minimize the likelihood of condor injury and mortality. (An example of a 2015 curtailment strategy is shutting down wind generation operations when condor(s) are present, or wind generation facilities switching to night operations only). The strategy must be approved by the BLM and USFWS, in coordination with CDFW as appropriate.	No	Project not within the range or habitat of this species.	The Project is not within California condor range or habitat.
	LUPA-BIO-IFS-21	If condors begin to regularly visit a site, BLM may require, in coordination with USFWS, and CDFW as appropriate, the implementation of additional measures to minimize potential impacts to condors. These measures will be based on best available data, activity and areas specifics, and may include, but are not limited to: ■ Barriers, including welded wire fabric or hardware cloth, will be installed to prevent access around any facility element that poses a danger to condors. ■ Stainless steel lines, rather than poly chemical lines will be used to preclude condors from obtaining and ingesting pieces of poly chemical lines. ■ Landing deterrents attached to the walking perching substrates, such as porcupine wire or Daddi Long Legs ®.	No	Project not within the range or habitat of this species.	The Project is not within California condor range or habitat.
	LUPA-BIO-IFS-22	Operations and/or activities that reach an activity-specified trigger for condor injury and/or mortality as determined by BLM and USFWS, and CDFW as appropriate, will curtail operations and/or activities using best available techniques, as determined by BLM and USFWS, and CDFW as appropriate. (An example of	No	Project not within the range or habitat of this species.	The Project is not within California condor range or habitat.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		a 2015 curtailment strategy is shutting down wind generation operations when condor(s) are present, or wind generation facilities switching to night operations only.) If curtailment techniques are not viable or available, then operations and/or activities will be suspended until the injury and/or condor mortality issue is resolved to the satisfaction of BLM and USFWS, and CDFW, as appropriate.			
	LUPA-BIO-IFS-23	In the range of the California condor, if an activity may have an impact on California condors, a Condor Operations Strategy (COS) will be developed and implemented on a activity-specific basis in order to avoid and/or reduce the likelihood of injury and mortality from activities. The COS shall be approved by BLM in coordination with USFWS, and CDFW as appropriate for third party activities, and may include, but is not limited, to detailing specifics on: the activity-specific detect, deter and curtailment strategy; monitoring approach to detect condor use of the site; adaptive management approach if condors are found to visit the site; and, activity-specific measures that assist in the recovery of condor.	No	Project not within the range or habitat of this species.	The Project is not within California condor range or habitat.
Golden Eagle	**LUPA-BIO-IFS-24**	Provide protection from loss and harassment of active golden eagle nests through the following actions: ■ Activities that may impact nesting golden eagles, will not be sited or constructed within 1-mile of any active or alternative golden eagle nest within an active golden eagle territory, as determined by BLM in coordination with USFWS as appropriate.	No	Project not within the range or habitat of this species.	The Easley Project is more than 1 mile from suitable golden eagle nesting habitat.
	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.	Yes		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.
	LUPA-BIO-IFS-26	For activities that impact golden eagles, applicants will conduct a risk assessment per the applicable USFWS guidance (e.g. the Eagle Conservation Plan Guidance) using best available information as well as the data collected in the pre-project golden eagle surveys.	No	Project not within the range or habitat of this species.	Impacts to golden eagle are not reasonably foreseeable due to distance to nesting sites and the nature of the Project infrastructure. Therefore, this CMA does not apply.
	LUPA-BIO-IFS-27	If a permit for golden eagle take is determined to be necessary, an application will be submitted to the USFWS in order to pursue a take permit.	No	Project not within the range or habitat of this species.	Based on the availability of golden eagle nesting habitat and existing and historic golden eagle locations near the Project area, and the nature of the Project infrastructure, the Easley Project would not require a golden eagle take permit.
	LUPA-BIO-IFS-28	In order to evaluate the potential risk to golden eagles, the following activities are required to conduct 2 years of pre-project golden eagle surveys in accordance with USFWS Eagle Conservation Plan Guidance as follows: ■ Wind projects and solar projects involving a power tower ■ Other activities for which the BLM, in coordination with USFWS, and CDFW as appropriate, determines take of golden eagle is reasonably foreseeable or there is a potential for take of golden eagle	No	Project not within the range or habitat of this species.	Impacts to golden eagle are not reasonably foreseeable due to distance to nesting sites and the nature of the Project infrastructure. Therefore, this CMA does not apply.
	LUPA-BIO-IFS-29	For active nests with recreational conflicts that risk the occurrence of take, provide public notification (e.g., signs) of the sensitive area and implement seasonal closures as appropriate.	No	Project not within the range or habitat of this species.	The Easley Project is not in an area of open recreation and is not a known nesting area. No recreational conflicts exist, and no public notification would be required.

LUPA Wide					
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	LUPA-BIO-IFS-30	For activities where ongoing take of golden eagles is anticipated, develop advanced conservation practices per USFWS Eagle Conservation Plan Guidance.	No	Project not within the range or habitat of this species.	Ongoing take of golden eagles is not anticipated at the Project.
	LUPA-BIO-IFS-31	As determined necessary by BLM in coordination with USFWS, and CDFW as appropriate, for activities/ projects that are likely to impact golden eagles implement site-specific golden eagle mortality monitoring in support of the pre-construction, pre-activity risk assessment surveys.	No	Project not within the range or habitat of this species.	The Easley Project is not likely to impact golden eagles. Avian Power Line Interaction Committee (APLIC) guidelines will be followed to avoid bird electrocutions along the gen-tie line.
Swainson's Hawk	**LUPA-BIO-IFS-32**	Avoid use of rodenticides and insecticides within five miles of active Swainson's hawk nest.	No	Project not within the range or habitat of this species.	The Project is outside of the geographic range (except during migration) of Swainson's hawks.
Desert Bighorn Sheep	**LUPA-BIO-IFS-33**	Access to, and use of, designated water sources for desert bighorn sheep will not be impeded by activities in designated and new utility corridors.	No	Resource not found on the project site	No designated water sources for desert bighorn sheep are located within the Easley Project.
	LUPA-BIO-IFS-34	Transmission projects and new utility corridors will minimize effects on access to, and use of, designated water sources for desert bighorn sheep.	No	Resource not found on the project site	No designated water sources are located within the Easley Project
Mohave Ground Squirrel	**LUPA-BIO-IFS-35**	Protocol surveys (see Glossary of Terms) are required for activities in Mohave ground squirrel key population centers and linkages as indicated in Appendix D. Results of protocol surveys will be provided to BLM and CDFW to consult on, as appropriate, for third party activities.	No	Project not within the range or habitat of this species.	The Easley Project is outside of the range of the Mohave ground squirrel.
	LUPA-BIO-IFS-36	Activities in Mohave ground squirrel key population centers, as identified in Appendix D, requiring an Environmental Impact Statement are required to assess the effect of the activity on the long-term function of the affected key population center. ▪ Activities within a key population center, as identified in Appendix D, must be designed to avoid adversely impacting the long-term function of the affected key population center.	No	Project not within the range or habitat of this species.	The Easley Project is outside of the range of the Mohave ground squirrel.
	LUPA-BIO-IFS-37	Activities in key population centers will be sited in previously disturbed areas, areas of low habitat quality and in areas with low habitat intactness, to the maximum extent practicable (see Glossary of Terms).	No	Project not within the range or habitat of this species.	The Easley Project is outside of the range of the Mohave ground squirrel.
	LUPA-BIO-IFS-38	Disturbance of suitable habitat from activities, requiring an EA or EIS, within the Mohave ground squirrel key population centers and linkages (as identified in Appendix D) will not occur during the typical dormant season (August 1 through February 28) unless absence is inferred and supported by protocol surveys or other available data during the previous active season.	No	Project not within the range or habitat of this species.	The Easley Project is outside of the range of the Mohave ground squirrel.
	LUPA-BIO-IFS-39	During the typical active Mohave ground squirrel season (February 1 through August 31), conduct clearance surveys throughout the site, immediately prior to initial ground disturbance in the areas depicted in Appendix D. In the cleared areas, perform monitoring to determine if squirrels have entered cleared areas. Contain ground disturbance to within areas cleared of squirrels. ▪ Detected occurrences of Mohave ground squirrel will be flagged and avoided, with a minimum avoidance area of 50 feet, until the squirrels have moved out of harm's way. A designated biologist (see Glossary of Terms) may also actively move squirrels out of harm's way.	No	Project not within the range or habitat of this species.	The Easley Project is outside of the range of the Mohave ground squirrel.
	LUPA-BIO-IFS-40	Activities sited in a Mohave ground squirrel linkage (see Appendix D) that may impact the linkage are required to analyze the potential effects on connectivity through the linkage. The activity must be designed to maintain the function of the linkage after construction/implementation and during project/activity operations. Linkage function will be assessed by considering pre- and post-activity ability of the area to support resident Mohave ground squirrels and provide for dispersal of their offspring to	No	Project not within the range or habitat of this species.	The Easley Project is outside of the range of the Mohave ground squirrel.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		key population centers outside the linkage, and dispersal through the linkage between key population centers. Activities that occur in Mohave ground squirrel linkages shown in Appendix D must be configured and located in a manner that does not diminish Mohave ground squirrel populations in the linkage.			
	LUPA-BIO-IFS-41	For any ground-disturbing (e.g., vegetation removal, earthwork, trenching) activities, occurrences of Mohave ground squirrel will be flagged and avoided, with a minimum avoidance area of 50 feet, until the squirrels have moved out of harm's way. A designated biologist (see Glossary of Terms) may also actively move squirrels out of harm's way.	No	Project not within the range or habitat of this species.	The Easley Project is outside of the range of the Mohave ground squirrel.
	LUPA-BIO-IFS-42	Rodenticides will not be used to manage rodents on activity within the range of the Mohave ground squirrel. Use of rodenticide inside of buildings is allowed.	No	Project not within the range or habitat of this species.	The Easley Project is outside of the range of the Mohave ground squirrel.
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 designated desert tortoise critical habitat will be in the same critical habitat unit as the impact (see **Table 18**). Compensation for impacts to desert tortoise will be in the same recovery unit as the impact. Refer to CMA **LUPA-COMP-1** and **2** for the timing requirements for initiation or completion of compensation.	Yes		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.
	LUPA-BIO-COMP-2	Birds and Bats – The compensation for the mortality impacts to bird and bat Focus and BLM Special Status Species from activities will be determined based on monitoring of bird and bat mortality and a fee re-assessed every 5 years to fund compensatory mitigation. The initial compensation fee for bird and bat mortality impacts will be based on pre-project monitoring of bird use and estimated bird and bat species mortality from the activity. The approach to calculating the operational bird and bat compensation is based on the total replacement cost for a given resource, a Resource Equivalency Analysis. This involves measuring the relative loss to a population (debt) resulting from an activity and the productivity gain (credit) to a population from the implementation of compensatory mitigation actions. The measurement of these debts and gains (using the same "bird years" metric as described in Appendix D) is used to estimate the necessary compensation fee. Each activity, as determined appropriate by BLM in coordination with USFWS, and CDFW as applicable, will include a monitoring strategy to provide activity-specific information on mortality effects on birds and bats in order to determine the amount and type of compensation required to offset the effects of the activity, as described above and in detail in Appendix D. Compensation will be satisfied by restoring, protecting, or otherwise improving habitat such that the carrying capacity or productivity is increased to offset the impacts resulting from the activity. Compensation may also be satisfied by non-restoration actions that reduce mortality risks to birds and bats (e.g., increased predator control and protection of roosting sites from human disturbance). Compensation will be consistent with the most up to date DOI mitigation policy.	Yes		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.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	LUPA-BIO-COMP-3	Golden eagle – BLM and third-party initiated activities, will provide specific golden eagle compensation in accordance with the most up to date BLM or USFWS policies, including applicable USFWS Eagle Conservation Plan Guidance.	No	Resource not found on the project site	The Project will have no direct impacts to golden eagles and loss of foraging habitat is addressed in other CMAs, so no compensation is required.
	LUPA-BIO-COMP-4	Golden eagle – Third-party applicant/activity proponents are required to contribute to a DRECP-wide golden eagle monitoring program, if the activity/project(s) has been determined, through the environmental analysis, to likely impact golden eagles.	No	Resource not found on the project site	The Project will have no direct impacts to golden eagles and loss of foraging habitat is addressed in other CMAs, so no compensation is required.
Air Resources	**LUPA-AIR-1**	All activities must meet the following requirements: ■ Applicable National Ambient Air Quality Standards (Section 109) ■ State Implementation Plans (Section 110) ■ 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)	Yes		The Project will comply with this CMA and meet all federal, state, and local laws and regulations.
	LUPA-AIR-2	Because project authorizations are a federal undertaking, air quality standards for fugitive dust may not exceed local standards and requirements.	Yes		With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with this CMA.
	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 PM_{10} and $PM_{2.5}$ 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.	Yes		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.
	LUPA-AIR-4	Because fugitive dust is the number one source of PM_{10} and $PM_{2.5}$ 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.	Yes		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.

LUPA Wide

Category	CMA #	CMA Text	Applicability	Explanation: Why CMA is not Applicable	Comments
	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. ***II.4.2.1.3 Comprehensive Trails and Travel Management*** **Components of a Designated Travel Network** In 2006, the BLM issued Instruction Memorandum No. 2006-173, which established policy for the use of terms and definitions associated with the management of transportation-related linear features. It also set a data standard and a method for storing electronic transportation asset data. According to the memorandum, all transportation assets are defined as follows: ○ Road: A linear route declared a road by the owner, managed for use by low-clearance vehicles having four or more wheels, and maintained for regular and continuous use. These may include ROW roads granted by the BLM to other entities. ○ Primitive Road: A linear route managed for use by four-wheel drive or high-clearance vehicles. These routes do not normally meet any BLM road design standards. ○ Trail: A linear route managed for human-powered, stock, or OHV forms of transportation or for historical or heritage values. Trails are not generally managed for use by four-wheel drive or high-clearance vehicles. **Designated Roads, Primitive Roads, and Trails** are categorized as follows: ○ Tier 1: Roads and Primitive Roads with high values for commercial, recreational, casual uses, and/or to provide access to other recreation activities. ○ Tier 2: Roads and Primitive Roads with high values for recreation and other motorized access (i.e., important through routes). ○ Tier 3: Primitive Roads and Trails with high value for motorized and non-motorized recreational pursuits (i.e., spur routes). **Off-Highway Vehicle Management** OHVs are synonymous with off-road vehicles. As defined in 43 CFR 8340.0-5 (a): Off-road vehicle means any motorized/battery-powered vehicle capable of, or designed for, travel on or immediately over land, water, or other natural terrain. In accordance with 43 CFR 8342.1, the BLM's regulations for OHV management, "the authorized officer shall designate all public lands as open, limited, or closed to [OHVs]." As such, all public lands within the Planning Area have been designated in one of three OHV designation categories, as follows: ○ Open Area Designations are used for intensive OHV or other transportation use areas where there are no special restrictions or where there are no compelling resource protection needs, user conflicts, or public safety issues to warrant limiting cross-country travel. ○ Limited Area Designations are used where travel must be restricted to meet specific resource/ resource use objectives. For areas classified as limited, the BLM must consider a range of possibilities, including travel that will be limited to the following: ○ Types or modes of travel, such as foot, equestrian, bicycle, and motorized ○ Existing roads and trails	Yes		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.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		○ Time or season of use; limited to certain types of vehicles (OHVs, motorcycles, all-terrain vehicles, high clearance, etc.); limited to licensed or permitted vehicles or use ○ BLM administrative use only ○ Other types of limitations ■ Closed Area Designations prohibit vehicular travel, both motorized and mechanized, transportation cross-country and on routes, except for where valid rights continue to allow access, such as within a designated Wilderness Area. Areas are designated closed if closure to all vehicular use is necessary to protect resources, promote visitor safety, or reduce use conflicts. **Back Country Byways Program** The BLM developed the Back County Byway Program to complement the National Scenic Byway Program established by the U.S. Secretary of Transportation. Back County Byways highlight the spectacular nature of the western landscapes. These routes vary from narrow graded roads that are passable only during a few months of the year to two-lane paved highways with year-round access. BLM will comply with the policy and guidelines of the BLM Back Country Byway Program and intent to showcase routes with high scenic and outstanding natural, cultural, historic or other values consistent with the designation. Where appropriate and feasible, BLM will highlight the spectacular nature of the western landscapes through education and interpretation along linear travel routes which provide recreational driving opportunities that allow for the experiences of solitude and isolation by: ■ Maintaining or improving access to BLM recreational destinations and activities ■ Helping meet the increasing demand for pleasure driving in back country environments. ■ Facilitating effective partnerships at the local, state, and national levels ■ Contributing to local and regional economies through increased tourism ■ Increasing public awareness of the availability of outstanding recreation attractions on public lands ■ Enhancing the visitors' recreation experience and communicate the multiple-use management message through an effective wayside interpretive program ■ Increasing the visibility of BLM as a major supplier of outdoor recreation opportunities ■ Managing the increased use created through the program to minimize impacts to the environment ■ Contributing to the National Scenic Byways Program in a way that is uniquely suited to national public lands managed by BLM Back country byways are designated by the type of road and the vehicle needed to safely travel the byway. Some back country byways vary from a single track bike trail to a low speed paved road that traverses back country areas. Segments of Back Country Byways are subdivided into four types based on the characteristic of the road. Due to their remoteness, byway travelers should always inquire locally as to byway access and road conditions. ■ Type I – Roads are paved or have an all-weather surface and have grades that are negotiable by 2-wheel drive vehicles and passenger cars. Most of these roads are narrow, slow speed, secondary routes though public lands.			

LUPA Wide					
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		▪ Type II – Roads that require high-clearance type vehicles such as trucks or 4-wheel drive vehicles. These roads are usually not paved, but may have some type of surfacing. Grades, curves, and road surface are such that they can be negotiated with a 2-wheel drive high clearance vehicle without undue difficulty. ▪ Type III – Roads require 4-wheel drive vehicles or other specialized vehicles such as dirt bikes, all-terrain vehicles (ATVs), etc. These roads are usually not surfaced, but are managed to provide for safety and resource protection needs. These roads can often have steep grades, uneven tread surfaces, and other characteristics that will require specialized vehicles to negotiate usually at slow speeds. ▪ Type IV – Trails are managed specifically to accommodate dirt bike, mountain bike, snowmobile or all-terrain vehicle use. Most of these routes are single track trails.			
LUPA-Wide Conservation and Management Actions for Comprehensive Trails and Travel Management	**LUPA-CTTM-1**	Maintain and manage adequate Road, Primitive Road, and Trail Access to and within SRMAs, ERMAs, OHV Open Areas, and Level 1, 2, and 3 Recreation Facilities.	No	Project is not located in or near the area specified in the CMA.	The Project would not impact access to recreational areas. Some routes that do not lead to recreational areas may be closed – an implementation decision for the BLM.
	LUPA-CTTM-2	Avoid activities that would have a significant adverse impact on use and enjoyment within 0.5 mile from centerline of tier 2 Roads/Primitive Roads, and 300 feet from centerline of tier 3 primitive roads/trails. If avoidance of Tier 2 and 3 roads, primitive roads and trails is not practicable, relocate access to the same or higher standard and maintain the setting characteristics and access to recreation activities, facilities, and destinations.	No	Project is not located in or near the area specified in the CMA.	The Easley Project would not impact access to recreational areas. Some routes that do not lead to recreational areas may be closed – an implementation decision for the BLM.
	LUPA-CTTM-3	Manage other significant linear features such as Mojave Road, Bradshaw Trail, or other recognized linear features to protect their important recreation activities, experiences and benefits. Prohibit activities that have a significant adverse impact on use and enjoyment within 0.5 mile (from centerline) of such linear features.	No	Project is not located in or near the area specified in the CMA.	There are no significant linear features that are within 0.5 miles of the Project. The nearest linear feature, the Bradshaw Trail, is about 17 miles south of Desert Center.
	LUPA-CTTM-4	If residual impacts to Tier 1 and Tier 2 roads/primitive roads, Back Country Byways, or significant linear features occur from adjacent DFAs or other activities, commensurate compensation in the form of enhanced recreation operations, access, recreation facilities or opportunities will be required.	No	Project is not located in or near the area specified in the CMA.	There are no Tier 1 or Tier 2 roads/primitive roads, Back Country Byways, or significant linear features that would be affected by the Project.
	LUPA-CTTM-5	Manage OHV use per the appropriate Transportation and Travel Management Plan/RMP and/or the SRMA Objectives as outlined in Appendix C as Open, Limited or Closed.	No	Project is not located in or near the area specified in the CMA.	The Easley Project would not conflict with OHV management. Some routes that do not lead to recreational areas may be closed – an implementation decision for the BLM.
	LUPA-CTTM-6	Manage Back Country Byways as a component of BLM Recreation and Travel and Transportation Management program**.**	No	Project is not located in or near the area specified in the CMA.	There are no Back Country Byways within the Desert Center area. The nearest Back Country Byway, the Bradshaw Trail, is about 17 miles south of Desert Center.
	LUPA-CTTM-7	Manage Recreation Facilities consistent with the objectives for the recreation management areas and facilities (see also Section II.4.2.1.10).	No	Project is not located in or near the area specified in the CMA.	There are no Recreation Facilities within, or near, the Project.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
Cultural Resources and Tribal Interests	**LUPA-CUL-1**	Continue working with the California Office of Historic Preservation (OHP) to develop and implement a program for record keeping and tracking agency actions that meets the needs of BLM and OHP organizations pursuant to existing State and National agreements and regulation (BLM State Protocol Agreement; BLM National Programmatic Agreement).	No	Land use does not occur on project site.	This is a Plan-wide BLM task. Record keeping and tracking are agency functions, therefore, this CMA does not pertain to this specific Project.
	LUPA-CUL-2	Using relevant archaeological and environmental data, identify priority geographic areas for new field inventory, based upon a probability for unrecorded significant resources and other considerations.	No	Land use does not occur on project site.	This is a Plan-wide BLM task. BLM determines priority geo-graphic areas for inventory outside of the compliance review process for individual projects.
	LUPA-CUL-3	Identify places of traditional cultural and religious importance to federally recognized Tribes and maintain access to these locations for traditional use.	Yes		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.
	LUPA-CUL-4	Design activities to minimize impacts on cultural resources including places of traditional cultural and religious importance to federally recognized Tribes.	Yes		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.
	LUPA-CUL-5	Develop interpretive material to correspond with recreational uses to educate the public about protecting cultural resources and avoiding disturbance of archaeological sites.	No	Land use does not occur on project site.	This is a Plan-wide BLM task. The Project does not include any recreational uses.
	LUPA-CUL-6	Develop partnerships to assist in the training of groups and individuals to participate in site stewardship programs.	No	Land use does not occur on project site.	This is a Plan-wide BLM task. The Project would not result in group or individual use of any sites.
	LUPA-CUL-7	Coordinate with visual resources staff to ensure VRM Classes consider cultural resources and tribal consultation to include landmarks of cultural significance to Native Americans (TCPs, trails, etc.).	Yes		The analysis of the VRM Classes will consider all applicable resources in the analysis. The Project will comply with this CMA.
	LUPA-CUL-8	Conduct regular contact and consultation with federally recognized Tribes and individuals, consistent with statute, regulation and policy.	Yes		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
	LUPA-CUL-9	Promote DRECP desert vegetation types/communities by avoiding them where possible, then use required compensatory mitigation, off-site mitigation, and other means to ensure Native American vegetation collection areas and practices are maintained.	Yes		This is accomplished through NEPA, EX13175 and EX13007 and all other applicable laws, regulations, and policies. The Project will comply with this CMA.
	LUPA-CUL-10	Promote and protect desert fan palm oasis vegetation type/communities by avoiding where possible, then use required compensatory mitigation, off-site mitigation, and other means to ensure Native American cultural values are maintained.	No	Resource not found on the project site	There are no desert fan palm oasis communities near the Project.
	LUPA-CUL-11	Promote and protect desert microphyll woodland vegetation type/communities to ensure Native American cultural values are maintained.	Yes		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 micro-phyll woodland except for minor incursion. The Project will comply with this CMA.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
Lands and Realty	**LUPA-LANDS-1**	Identify acquired lands as right-of-way exclusion areas when development is incompatible with the purpose of the acquisition.	No	Land use does not occur on project site.	The Project is not located on acquired lands.
	LUPA-LANDS-2	Prioritize acquisition of land within and adjacent to conservation designation allocations. Acquired land in any land use allocation in this Plan will be managed according to the applicable allocation requirements and/or for the purposes of the acquisition. Management boundaries for the allocation may be adjusted to include the acquired land if the acquisition lies outside the allocation area through a future land use plan amendment process.	No	Project is not associated with a land exchange.	The Project would not acquire lands except as mitigation. Mitigation lands would need to conform to the resource needs and then could consider other priorities. Mitigation lands would need to be approved by the BLM
	LUPA-LANDS-3	Within land use allocations where renewable energy and ancillary facilities are not allowed, an exception exists for geothermal development. Geothermal development will be an allowable use if a geothermal-only DFA overlays the allocation and the lease includes a no surface occupancy stipulation with exception of three specific parcels in the Ocotillo Wells SRMA (refer to the Ocotillo Wells SRMA Special Unit Management Plan in Appendix C).	No	Land use does not occur on project site.	The Project is located in a DFA
	LUPA-LANDS-4	Nonfederal lands within the boundaries of BLM LUPA land use allocations are not affected by the LUPA.	Yes		The Project parcels located on federal land are designated as DFA.
	LUPA-LANDS-5	The MUCs used to determine land tenure in the CDCA Plan will be replaced by areas listed in the CMAs below.	Yes		The Project is located in a DFA and will comply with this CMA.
	LUPA-LANDS-6	Any activities on Catellus Agreement lands will be consistent with deed restrictions	No	Project not located on federal lands with this designation.	The Project is not located on Catellus Agreement lands.
	LUPA-LANDS-7	Any activities on Catellus Agreement lands will be subject to the approval of the California State Director.	No	Project not located on federal lands with this designation.	The Project is not located on Catellus Agreement lands.
	LUPA-LANDS-8	The CDCA Plan requirement that new transmission lines of 161kV or above, pipelines with diameters greater than 12 inches, coaxial cables for interstate communications, and major aqueducts or canals for interbasin transfers of water will be located in designated utility corridors, or considered through the plan amendment process outside of designated utility corridors, remains unchanged. The only exception is that transmission facilities may be located outside of designated corridors within DFAs without a plan amendment. This CMA does not apply the Bishop and Bakersfield RMPs.	Yes		The Project is located in a DFA and will comply with this CMA.
Exchanges with the State of California	**LUPA-LANDS-8**	Continue land exchanges with the State of California, as per the LUPA goals and objectives in Section II.4.1.4. Refer to Appendix F.	No	Project is not associated with a land exchange.	No land exchanges would be made for the Project.
	LUPA-LANDS-9	Enter into land exchanges with the California State Lands Commission (CSLC) which convey BLM lands suitable for, or developed as, large-scale renewable energy related projects in exchange for CSLC school lands located in and adjacent to designated conservation areas. These exchanges will follow the procedures outlined in Memorandum of Agreement Relating to Land Exchanges to Consolidate Land Parcels signed by the BLM and CSLC on May 21, 2012.	No	Project is not associated with a land exchange.	No land exchanges would be made for the Project.
	LUPA-LANDS-10	Prioritize land exchange proposals from the CSLC on available lands if there are competing land tenure proposals (e.g., land sale or exchange), CSLC proposals that enhance revenues for schools will generally be given priority.	No	Project is not associated with a land exchange.	No land exchanges would be made for the Project.

LUPA Wide

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
Livestock Grazing	**LUPA-LIVE-1**	Adopt the Standards of Rangeland Health and Guidelines for Grazing Management, as detailed below, for the CDCA. This CMA does not apply in the Bishop and Bakersfield RMPs. **Standards of Rangeland Health and Guidelines for Grazing Management** Regional Public Land Health Standards and Guidelines are required for all BLM administered lands in accordance with Part 43 of the CFR subsection 4180. These regulations require that State Directors, in consultation with Resource Advisory Councils, develop Standards for Rangeland Health and Guidelines for grazing management. The BLM in coordination and consultation with the California Desert District Advisory Committee (see Section 601 of the FLPMA as amended) developed standards and guidelines for the CDCA and used the following land use plan amendments to analyze the specific standard and guideline and to provide the public and opportunity to comment. ■ Northern and Eastern Colorado Desert Management Plan—NECO—ROD signed Dec. 2002 (BLM 2002a) ■ Northern and Eastern Mojave Desert Management Plan—NEMO—ROD signed Dec. 2002 (BLM 2002b) ■ West Mojave Plan—WEMO—ROD signed March 2006 (BLM 2006) The regulations require approval by the Secretary of the Interior prior to full implementation of standards and guidelines. Until approval is received, the fallback standards and guidelines will be used. The regulations require approval by the Secretary of the Interior prior to full implementation of the California Desert District standards and guidelines. Until approval is received, the fallback standards and guidelines will be used in the 5 Desert District Offices. Bakersfield and Bishop Field Offices are covered under the Central California Standards and Guidelines and require no additional approval to continue to use that document. **Standards and Guidelines for the CDCA** **Standards** of land health are expressions of levels of physical and biological condition or degree of function required for healthy lands and sustainable uses, and define minimum resource conditions that must be achieved and sustained (BLM 2001). **Guideline.** A practice, method or technique determined to be appropriate to ensure that standards can be met or that significant progress can be made toward meeting the standard. Guidelines are tools such as grazing systems, vegetative treatments, or improvement projects that help managers and permittees achieve standards. Guidelines may be adapted or modified when monitoring or other information indicates the guideline is not effective, or a better means of achieving the applicable standard becomes appropriate (H-4180-1 Rangeland Health Standards). The following **Standards** for the CDCA are from the NECO, NEMO, WEMO, and Palm Springs South Coast Resource Management Plan (PSSCRMP) land use plan amendments. **Soils** Soils exhibit infiltration and permeability rates that are appropriate to soil type, climate, geology, land form, and past uses. Adequate infiltration and permeability of soils allow accumulation of soil moisture necessary for optimal plant growth and vigor, and provide a stable watershed, as indicated by: ■ Canopy and ground cover are appropriate for the site. ■ There is a diversity of plant species with a variety of root depths. ■ Litter and soil organic matter are present at suitable sites.	No	Land use does not occur on project site.	The Project is not located in a grazing allotment.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		■ Microbiotic soil crusts are maintained and in place at appropriate locations. ■ Evidence of wind or water erosion does not exceed natural rates for the site. ■ Soil permeability, nutrient cycling, and water infiltration are appropriate for the soil type. **Native Species** Healthy, productive, and diverse habitats for native species, including Special Status Species (federal threatened and endangered, federally proposed, federal candidates, BLM sensitive, or California State threatened and endangered, and Unique Plant Assemblages), are maintained in places of natural occurrence, as indicated by: ■ Photosynthetic and ecological processes are continuing at levels suitable for the site, season, and precipitation regimes. ■ Plant vigor, nutrient cycle, and energy flow are maintaining desirable plants and ensuring reproduction and recruitment. ■ Plant communities are producing litter within acceptable limits. ■ Age class distribution of plants and animals are sufficient to overcome mortality fluctuations. ■ Distribution and cover of plant species and their habitats allow for reproduction and recovery from localized catastrophic events. ■ Alien and noxious plants and wildlife do not dominate a site or do not require action to prevent the spread and introduction of noxious/invasive weeds. ■ Appropriate natural disturbances are evident. ■ Populations and their habitats are sufficiently distributed and healthy to prevent the need for new listing as Special Status Species. **Riparian/Wetland and Stream Function** Wetland systems associated with subsurface, running, and standing water function properly and have the ability to recover from major disturbances. Hydrologic conditions are maintained, as indicated by: ■ Vegetative cover adequately protects banks and dissipates energy during peak water flows. ■ Dominant vegetation is an appropriate mixture of vigorous riparian species. ■ Recruitment of preferred species is adequate to sustain the plant community. ■ Stable soils store and release water slowly. ■ Plant species present indicate soil moisture characteristics are being maintained. ■ There is minimal cover of shallow-rooted invader species, and they are not displacing deep-rooted native species. ■ Shading of stream courses and water courses is sufficient to support riparian vertebrates and invertebrates. ■ Stream is in balance with water and sediment being supplied by the watershed. ■ Stream channel size (depth and width) and meander is appropriate for soils, geology, and landscape. ■ Adequate organic matter (litter and standing dead plant material) is present to protect the site from excessive erosion and to replenish soil nutrients through decomposition.			

LUPA Wide

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
		Water Quality Surface and groundwater comply with objectives of the Clean Water Act and other applicable water quality requirements, including meeting the California State standards, as indicated by: ■ The following do not exceed the applicable requirements: chemical constituents, water temperature, nutrient loads, fecal coliform, turbidity, suspended sediment, and dissolved oxygen. ■ Standards are achieved for riparian, wetlands, and water bodies. ■ Aquatic organisms and plants (e.g., macro-invertebrates, fish, algae, and plants) indicate support for beneficial uses. ■ Monitoring results or other data show water quality is meting the Standard. The following **Guidelines** for grazing in the CDCA are from the NECO, NEMO, WEMO, and PSSCRMP land use plan amendments. ■ Facilities will be located away from riparian-wetland areas whenever they conflict with achieving or maintaining riparian-wetland functions. ■ The development of springs and seeps or other projects affecting water and associated resources will be designed to protect the ecological functions and processes of those sites. ■ Grazing activities at an existing range improvement that conflict with achieving proper functioning conditions (PFC) and resource objectives for wetland systems (lentic, lotic, springs, adits, and seeps) would be modified so PFC and resource objectives can be met, and incompatible projects would be modified to bring them into compliance. The BLM would consult, cooperate, and coordinate with affected interests and livestock producers prior to authorizing modification of existing projects and initiation of new projects. New range improvement facilities would be located away from wetland systems if they conflict with achieving or maintaining PFC and resource objectives. ■ Supplements (e.g., salt licks) will be located one-quarter mile or more away from wetland systems so they do not conflict with maintaining riparian-wetland functions. ■ Management practices will maintain or promote perennial stream channel morphology (e.g., gradient, width/depth ratio, channel roughness, and sinuosity) and functions that are appropriate to climate and landform. ■ Grazing management practices will meet state and federal water quality Standards. Impoundments (stock ponds) having a sustained discharge yield of less than 200 gallons per day to surface or groundwater, are excepted from meeting state drinking water standards per California State Water Resources Control Board Resolution Number 88-63. ■ Refer to the most-up-to-date BLM Fire Policy for information related to suppression and use of wildland fire within the planning area. ■ In years when weather results in extraordinary conditions, seed germination, seedling establishment, and native plant species growth should be allowed by modifying grazing use. ■ Grazing on designated ephemeral rangeland could be allowed only if reliable estimates of production have been made, an identified level of annual growth or residue to remain on site at the end of the grazing season has been established, and adverse effects on perennial species are avoided. ■ During prolonged drought, range stocking will be reduced to achieve resource objectives and/or prescribed perennial forage utilization. Livestock utilization of key perennial species on year-long allot-			

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		ments should be checked about March 1 when the Palmer Severity Drought Index/Standardized Precipitation Index indicates dry conditions are expected to continue. ■ Through the assessment process or monitoring efforts, the extent of invasive and/or exotic plants and animals should be recorded and evaluated for future control measures. Methods and prescriptions should be implemented, and an evaluation would be completed to ascertain future control measures for undesirable species. ■ Restore, maintain or enhance habitats to assist in the recovery of federally listed threatened and endangered species. Restore, maintain or enhance habitats of Special Status Species including federally proposed, federal candidates, BLM sensitive, or California State threatened and endangered to promote their conservation. ■ Grazing activities should support biological diversity across the landscape, and native species and microbiotic crusts are to be maintained. ■ Experimental research efforts should be encouraged to provide answers to grazing management and related resource concerns through cooperative and collaborative efforts with outside agencies, groups, and entities. ■ Livestock utilization limits of key perennial species will be as shown in (see **Table 19**) for the various range types. **Monitoring** Monitoring of grazing allotment resource conditions would be routinely assessed to determine if Public Land Health Standards are being met. In those areas not meeting one or more Standards, monitoring processes would be established where none exist to monitor indicators of health until the Standard or resource objective has been attained. Livestock trail networks, grazed plants, livestock facilities, and animal waste are expected impacts in all grazing allotments and these ongoing impacts would be considered during analysis of the assessment and monitoring process. Activity plans for other uses or resources that overlap an allotment could have prescribed resource objectives that may further constrain grazing activities (e.g., ACEC). In an area where a Standard has not been met, the results from monitoring changes to grazing management required to meet Standards would be reviewed annually. During the final phase of the assessment process, the Range Determination includes the schedule for the next assessment of resource conditions. To attain Standards and resource objectives, the best science would be used to determine appropriate grazing management actions. Cooperative funding and assistance from other agencies, individuals, and groups would be sought to collect prescribed monitoring data for indicators of each Standard.			
LUPA-Wide Conservation and Management Actions for Livestock Grazing	**LUPA-LIVE-2**	In the CDCA only, accept grazing permit/lease donations in accordance with legislation in the Fiscal Year 2012 Appropriations Act (Public Law 112-74).	No	Land use does not occur on project site.	The Project is not located in a grazing allotment.
	LUPA-LIVE-3	In the Bishop and Bakersfield RMPs, determine whether continued livestock grazing would be compatible with achieving land use plan management goals and objectives in the event that the permit/lease is relinquished.	No	Land use does not occur on project site.	The Project is not located in a grazing allotment.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	LUPA-LIVE-4	If the BLM determines that the grazing allotment is to be put to a different public purpose than grazing, follow the notification requirements outline in the Grazing Regulations at 43 CFR 4110.4-2(b) and BLM Instruction Memorandum (IM) 2011-181 (BLM 2011), or future policy replacing IM 2011-181.	No	Land use does not occur on project site.	The Project is not located in a grazing allotment.
	LUPA-LIVE-5	For grazing allotments within the CDCA that BLM has received a voluntary request for relinquishment prior to fiscal year 2012, continue the planning process for making these allotments unavailable for grazing.	No	Land use does not occur on project site.	The Project is not located in a grazing allotment.
	LUPA-LIVE-6	Complete the process for approving rangeland health standards and guidelines for the CDCA Plan (NEMO, WEMO, NECO and PSSCRMP).	No	Land use does not occur on project site.	The Project is not located in a grazing allotment.
	LUPA-LIVE-7	Make Pilot Knob, Valley View, Cady Mountain, Cronese Lake, and Harper Lake allotments, allocations unavailable for livestock grazing and change to management for wildlife conservation and ecosystem function. Reallocate the forage previously allocated to grazing use in these allotments to wildlife and ecosystem functions. Pilot Knob was closed in the WEMO plan amendment. The Cronese Lake, Harper Lake, and Cady Mountain allotments were closed as mitigation for the impacts to the Agassiz's desert tortoise resulting from the Fort Irwin expansion. All forage allocated to livestock grazing in these allotments will be reallocated to wildlife use and ecosystem function.	No	Land use does not occur on project site.	The Project is not located in a grazing allotment.
	LUPA-LIVE-8	The following vacant grazing allotments within the CDCA will have all vegetation previously allocated to grazing use reallocated to wildlife use and ecosystem functions and will be closed and unavailable to future livestock grazing: Buckhorn Canyon, Crescent Peak, Double Mountain, Jean Lake, Johnson Valley, Kessler Springs, Oak Creek, Chemehuevi Valley, and Piute Valley.	No	Land use does not occur on project site.	The Project is not located in a grazing allotment.
	LUPA-LIVE-9	Allocate the forage that was allocated to livestock use in the Lava Mountain and Walker Pass Desert allotments (which have already been relinquished under the 2012 Appropriations Act) to wildlife use and ecosystem function and permanently eliminate livestock grazing on the allotments.	No	Land use does not occur on project site.	The Project is not located in a grazing allotment.
Minerals	**LUPA-MIN-1**	High Potential Mineral Areas (identified in CA GEM data) ■ These areas have been identified as mineral lands having existing and/or historic mining activity and a reasonable probability of future mineral resource development. These identified areas will be designated as mineral land polygons on DRECP maps, recognized as probable future development areas for planning purposes and allowable use areas. ■ If an activity is proposed in a High Potential Mineral Area, analyze and consider the mineral resource value in the NEPA analysis.	No	Land use does not occur on project site.	The Project is not located in an area identified as a High Potential Mineral Area.
	LUPA-MIN-2	**Existing Mineral/Energy Operations** Existing authorized mineral/energy operations, including existing authorizations, modifications, extensions and amendments and their required terms and conditions, are designated as an allowable use within all BLM lands in the LUPA Decision Area, and unpatented mining claims subject to valid existing rights. Amendments and expansions authorized after the signing of the DRECP LUPA ROD are subject to applicable CMAs, including ground disturbance caps within Ecological and Cultural Conservation Areas, subject to valid existing rights, subject to governing laws and regulations.	No	Land use does not occur on project site.	The Project is not located in an area with existing minerals or energy operations.
	LUPA-MIN-3	Existing High Priority Mineral/Energy Operations Exclusion Areas ■ Existing high-priority operation footprints and their identified expansion areas are excluded from DFA and conservation CMAs, but must comply with LUPA-wide CMAs subject to the governing laws and regulations.	No	Land use does not occur on project site.	The Project is not located in an existing high priority mineral area.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		▪ High priority operation exclusions are referenced by name with their respective footprint (acreage) below. ○ MolyCorp REE (General Legal Description: 35º 26'N; 115º 29'W)—10,490.9 surface acres ○ Briggs Au, Etna (General Legal Description: 35º 56'N; 117º 11'W)—3,216.9 surface acres ○ Cadiz Evaporites (General Legal Description: 34º 17'N; 115º 23'W)—2,591.5 surface acres ○ Searles Dry Lake (Evaporate) Operation (General Legal Description: 35º 43'N; 117º 19'W)—72,000 surface acres ○ Bristol Dry Lake (Evaporate) Operation (General Legal Description: 34º 29'N; 115º 43'W)—3,500 surface acres ○ Mesquite Gold Mine (General Legal Description: 33º 04'N; 114º 59'W)—4,500 surface acres ○ Hector Mine (Hectorite Clay) (General Legal Description: 34º 45'N; 116º 25'W)—1,500 surface acres ○ Castle Mountain/Viceroy Mine (Gold) (General Legal Description: 35º 17'N; 115º 3'W)—5,000 surface acres			
	LUPA-MIN-4	Access to Existing Operations ▪ Established designated, approved, or authorized access routes to the aforementioned existing authorized operations and areas will be designated as allowable uses. ▪ Access routes to Plans of Operations and Notices approved under 43 CFR 3809 will be granted subject to valid existing rights listed in 43 CFR 3809.100.	No	Land use does not occur on project site.	The Project is not in an area where there are identified mineral resources.
	LUPA-MIN-5	Areas Located Outside Identified Mineral Areas ▪ Areas which could not be characterized due to insufficient data and mineral potential may fluctuate dependent on market economy, extraction technology, and other geologic information- requiring periodic updating. Authorizations are subject to the governing laws and regulations and LUPA requirements.	No	Land use does not occur on project site.	The Project is not in an area where there are identified mineral resources. Therefore, it is not an area that could not be characterized due to insufficient data or where it may fluctuate.
	LUPA-MIN-6	New or expanded mineral operations will be evaluated on a case-by-case basis, and authorizations are subject to LUPA requirements, and the governing laws and regulations.	No	Land use does not occur on project site.	The Project is not in an area where there are existing mineral operations or identified mineral resources.
National Recreation Trails	**LUPA-NRT-1**	The Nadeau Road NRT was designated by the Secretary of the Interior in June 2013. The California Desert District nominates the Sperry Wash Road, El Mirage Interpretive Trail East, and El Mirage Interpretive Trail West for NRT designation.	No	Project is not located in or near the area specified in the CMA.	The Project is not near the NRTs
	LUPA-NRT-2	The Nadeau NRT Management Corridor will be protected and activities impacting use and enjoyment of the trail will be avoided within 0.5 mile from centerline of the route.	No	Project is not located in or near the area specified in the CMA.	The Project is not near the NRT Management Corridor.
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.	Yes		Paleontological sensitivity maps have been included in POD Appendix F (Paleontological Resources Technical Report). The Project will comply with this CMA.
	LUPA-PALEO-2	Incorporate all guidance provided by the Paleontological Resources Protection Act.	Yes		With implementation of paleontological resources mitigation measures to be developed during the NEPA process, the Project will comply with the CMA.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applicability**	**Explanation: Why CMA is not Applicable**	**Comments**
	LUPA-PALEO-3	Ensure proper data recovery of significant paleontological resources where adverse impacts cannot be avoided or otherwise mitigated.	Yes		With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with the CMA.
	LUPA-PALEO-4	Paleontological surveys and construction monitors are required for ground disturbing activities that require an EIS.	Yes		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 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.	Yes		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
	LUPA-REC-2	Cooperate with the network of communities and recreation service providers active within the planning area to protect the principal recreation activities and opportunities, and the associated conditions for quality recreation, by enhancing appropriate visitor services, and by identifying and mitigating impacts from development, inconsistent land uses and unsustainable recreation practices such as minimizing impacts to known rockhounding gathering areas.	No	Land use does not occur on project site.	The Project will not directly impact recreation service providers within the DFA or result in unsustainable recreation practices.
	LUPA-REC-3	Manage lands not designated as SRMAs or ERMAs to meet recreation and visitor services and resource stewardship needs as described in Resource Management Plans (RMPs).	No	Land use does not occur on project site.	The Project is located on land allocated as a DFA and appropriate for renewable energy development and linear infrastructure, DFAs are not allocated for recreation.
	LUPA-REC-4	Prohibit activities that have a significant adverse impact and that do not enhance conservation or recreation values within one mile of Level 1 and Level 2 Recreation facility footprint.	No	Land use does not occur on project site.	There are no Level 1 or Level 2 recreation areas within one mile of the Project. The nearest Recreation Facility is Corn Springs Campground, 10 miles south of Interstate 10.
	LUPA-REC-5	Avoid activities that have a significant adverse impact and that do not enhance conservation or recreation values within one-half mile of Level 3 Recreation facility footprint including route access and staging areas. If avoidance is not practicable, the facility must be relocated to the same or higher recreation standard and maintain recreation objectives and setting characteristics.	No	Land use does not occur on project site.	The nearest Level 3 facility is the kiosk at Corn Springs Road, which is outside the ½-mile buffer established in LUPA-REC-5.
	LUPA-REC-6	Limit signage to that necessary for recreation facility/area identification, interpretation, education and safety/regulatory enforcement.	Yes		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.
	LUPA-REC-7	Refer to local RMPs, RMP amendments, and activity level planning for specially designated areas for Vehicular Stopping, Parking, and Camping limitations.	No	Land use does not occur on project site.	The Project would not include any vehicular stopping, parking, or camping areas. The Project site is located within a DFA.
	LUPA-REC-8	Provide on-going maintenance of recreation and conservation facilities, interpretive and regulatory signs, roads, and trails.	No	Land use does not occur on project site.	The Project would not be located within or near recreation and conservation facilities.

LUPA Wide					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
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.	Yes		With implementation of mitigation measures to be developed during the NEPA process, the Project will comply with the CMA.
	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 . Specific requirements, such as buffer zones and setbacks, may be based, in part, on the results of the Water Supply Assessment defined below. In general, placement of long-term facilities within buffers or protected zones for soil and water resources is discouraged but may be permitted if soil and water resource management objectives can be maintained.	Yes		The Project will comply with this CMA and minimize long-term facilities in buffers or protected zones for soil and water resources.
	LUPA-SW-3	Where a seeming conflict between CMAs within or between resources arises, the CMA(s) resulting in the most resource protection apply.	Yes		No conflicts between CMAs have been identified for the Project.
	LUPA-SW-4	Nothing in the "Exceptions" below applies to or takes precedence over any of the CMAs for biological resources.	Yes		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.	Yes		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.	Yes		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.	Yes		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.	Yes		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.	Yes		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

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					of desert pavement. Biological resources mitigation would require compensation for habitat impacts including ensuring that the habitat value of the compensation lands is 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.	Yes		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.	Yes		The Project will comply with this CMA and will avoid side casting where road construction requires cut-and-fill procedures.
Surface Water	**LUPA-SW-12**	Except in DFAs, exclude long-term structures in, playas (dry lake beds), and Wild and Scenic River corridors, except as allowed with minor incursions (see definition in the Glossary of Terms).	No	Project is not located in or near the area specified in the CMA.	The Project is located in a DFA and would not place structures on a playa or a Wild and Scenic River corridor.
	LUPA-SW-13	BLM will manage all riparian areas to be maintained at, or brought to, proper functioning condition.	Yes		The CMA is specific to BLM actions. Riparian areas would be managed by qualified biologists that would clearly demarcate work areas so no impacts would occur outside of the project limits. Temporarily impacted native vegetation would recover from rootstocks and temporarily disturbed areas would be revegetated per a Vegetation Resources Management Plan. Non-native invasives would be monitored and eradicated per the IWMP to prevent introduction or spread into adjacent areas. Impacts to native habitat would be mitigated in accordance with regulatory permits from the CDFW and RWQCB. Impacts to desert dry wash woodland would be avoided on private lands, as on BLM lands in accordance with the DREPC CMAs. Habitat impacts on BLM lands would also be mitigated in accordance with the DRECP and mitigation measures in the final NEPA document.
	LUPA-SW-14	All relevant requirements of Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands) will be complied with.	No	Project is not located in or near the area specified in the CMA.	The Project would not be located in a FEMA or Department of Housing and Urban Development (HUD) mapped floodplain, and Project construction is not proposed in wetlands, so this CMA does not apply.
	LUPA-SW-15	Surface water diversion for beneficial use will not occur absent a state water right.	No	Resource not found on the project site	Surface water diversion for beneficial use will not occur absent a state water right.
	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	Yes		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.

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		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.			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.	Yes		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.	Yes		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.	Yes		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-20	After application of applicable avoidance and minimization measures, all remaining unavoidable residual impacts to surface waters from the proposed activity shall be mitigated to ensure no net loss of function and value, as determined by the BLM.	No	Resource not found on the project site	The Project would comply with BMPs and allow sheet flow through the sites. No unavoidable residual impacts to surface waters are anticipated that would result in a net loss of function and value.
	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.	Yes		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.
	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.	Yes		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.	Yes		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.

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		■ 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 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.			

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		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 ■ 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.	Yes		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.	Yes		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.
	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	Yes		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

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		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.			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.	Yes		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-28	Groundwater extractions from adjudicated basins, such as the Mojave River Basin, may be subject to additional restrictions imposed by the designated authority; examples include the Mojave Water Agency and San Bernardino County (see County Ordinance 3872). Where provisions of the adjudication allow for acquisition of water rights, project developers could be required to retire water rights at least equal in volume to those necessary for project operation or propose an alternative offset based on the conditions unique to the adjudicated basin.	No	Project is not located in or near the area specified in the CMA.	The Project is not located within an adjudicated basin.
	LUPA-SW-29	Groundwater pumping mitigation may be imposed if monitoring data indicate impacts on groundwater or groundwater-dependent habitats outside the DRECP area, including those across the border in Nevada. See **LUPA-SW-26** for potential mitigation measures.	No	Project is not located in or near the area specified in the CMA.	The Project would have no impact on groundwater outside of the DRECP area.
	LUPA-SW-30	Activities shall comply with local requirements for any long term or short-term domestic water use and wastewater treatment.	Yes		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.	Yes		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 circumstances, BLM shall require the applicant to offset or otherwise mitigate the volume of water causing drawdown below the Accounting Surface. Details of such mitigation measures and the right to the use of water shall be described in the Groundwater Water Monitoring and Mitigation Plan.	Yes		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.

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Soil, Water, and Water-Dependent Resources Restricted to Specific Areas on BLM Lands	**LUPA-SW-33**	**Stipulations for groundwater development in the proximity of Devils Hole**: Any development scenario for an activity within 25 miles of Devils Hole shall include a plan to achieve *zero-net* or *net-reduced* groundwater pumping to reduce the risk of adversely affecting senior federal reserved water rights, the designated critical habitat of the endangered Devils Hole pupfish, and the free-flowing requirements of the Wild and Scenic Amargosa River. This plan will require operators to acquire one or more minimization water rights (MWRs) in the over-appropriated, over-pumped, and hydraulically connected Amargosa Desert Hydrographic Basin in Nevada. The MWR(s) shall be: (1) an amount equal (at minimum) to that which is needed for construction and operations; (2) historically fully utilized, preferably for agricultural use; and (3) senior and closer to Devils Hole than the proposed point of diversion.	No	Project is not located in or near the area specified in the CMA.	The Project is not located within 25 miles of Devil's Hole.
	LUPA-SW-34	**Stipulations for groundwater development in the Calvada Springs/South Pahrump Valley area:** Activities in this area shall be required to acquire one or more MWRs in the Pahrump Valley Hydrographic Basin in Nevada. The acquired MWR(s) must: (1) be at least equal to the amount proposed to be required and actually used for project construction and operations; and (2) be fully utilized for at least the prior ten years.	No	Project is not located in or near the area specified in the CMA.	The Project is not located in the Calvada Springs/Couth Pahrump Valley area.
	LUPA-SW-35	Stipulations for activities in the vicinity of Death Valley National Park, Joshua Tree National Park, or Mojave National Preserve: The NEPA for activities involving groundwater extraction that are in the vicinity of Death Valley National Park, Joshua Tree National Park, or the Mojave National Preserve shall analyze and address any potential impacts of groundwater extraction on Death Valley National Park, Joshua Tree National Park, or Mojave National Preserve. BLM will consult with the National Park Service on this process. 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 storm-water 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	Yes		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	**LUPA-VRM-1**	Manage Visual Resources in accordance with the VRM classes shown on Figure 9.	Yes		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.
	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.	Yes		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.

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	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. mono-pole), 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.	Yes		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.
Wilderness Characteristics	**LUPA-WC-1**	Complete an inventory of areas for proposed activities that may impact wilderness characteristics if an updated wilderness characteristics inventory is not available.	No	Project is not located in or near the area specified in the CMA.	There are no lands with wilderness characteristics on or adjacent to the Project.
	LUPA-WC-2	Employ avoidance measures as described under DFAs and approved transmission corridors.	No	Project is not located in or near the area specified in the CMA.	There are no lands with wilderness characteristics on or adjacent to the Project.
	LUPA-WC-3	For inventoried lands found to have wilderness characteristics but not managed for those characteristics compensatory mitigation is required if wilderness characteristics are directly impacted. The compen-sation will be: ■ 2:1 ratio for impacts from any activities that impact those wilderness characteristics, except in DFAs and transmission corridors ■ 1:1 ratio for impact from any activities that impact the wilderness characteristics in DFAs and transmission corridors Wilderness compensatory mitigation may be accomplished through acquisition and donation, by willing landowners, to the federal government of (a) wilderness inholdings, (b) wilderness edge holdings that have inventoried wilderness characteristics, or (c) other areas within the LUPA Decision Area that are managed to protect wilderness characteristics. Restoration of impaired wilderness characteristics in Wilderness, Wilderness Study Area, and lands managed to protect wilderness characteristics could be substituted for acquisition.	No	Project is not located in or near the area specified in the CMA.	There are no lands with wilderness characteristics on or adjacent to the Project.
	LUPA-WC-4	For areas identified to be managed to protect wilderness characteristics, identified in Figure 7, the following CMAs are required: ■ Include a no surface occupancy stipulation for any leasable minerals with no exceptions, waivers, or modifications. ■ Exclude these areas from land use authorizations, including transmission. ■ Close areas to construction of new roads and routes. Vehicles will continue to be permitted on existing designated routes. ■ Close areas to mineral material sales.	No	Project is not located in or near the area specified in the CMA.	There are no lands with wilderness characteristics on or adjacent to the Project.

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		▪ Prohibit commercial or personal-use permits for extraction of materials (e. g. no wood-cutting permits). ▪ Manage the area as VRM II. ▪ Require that new structures and facilities are related to the protection or enhancement of wilderness characteristics or are necessary for the management of uses allowed under the land use plan. ▪ Make lands unavailable for disposal from federal ownership.			
	LUPA-WC-5	Manage the following Wilderness Inventory Units to protect wilderness characteristics: ▪ 132A-2 / 132A-3 / 132B / 136 / 136-1 / 145-1-1 / 145-2-1 / 145-3-1 / 149-2 / 150-2-2 / 158-1 / 158-2 / 159 / 159-1 / 159A-1 / 160 / 160-1 / 160B-2A / 160B-2B / 160B-2F / 160B-3A / 160B-4A / 160B-3B / 160B-4B / 170-1 / 170-3 / 193-1 / 206-1-1 / 206-1-2 / 206-1-3 / 206-1-4 / 222-2-1 / 251-1 / 251-1-1 / 251-1-2 / 251-2-2 / 251-3 / 251A / 252 / 259-1 / 259-2 / 266-1 / 276-1 / 276-3 / 277 / 277A-1 / 278 / 280 / 294-1 / 294-2 / 295 / 295A / 304-2 / 305-1 / 305-2 / 307-1 / 307-2 / 307-1-1 / 307-1-2 / 307-1-3 / 312-1 / 312-2 / 312-3 / 322-1 / 325-1 / 325-2 / 325-3 / 325-4 / 325-5 / 325-7 / 325-8 / 315-14 / 325-17 / 329 / 352-2 / 352A / 352A-1 / 354 / 355-1 / 355-2 / 355-3	No	Project is not located in or near the area specified in the CMA.	There are no lands with wilderness characteristics on or adjacent to the Project.

Transmission

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
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.	Yes		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.	Yes		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-3	When siting transmission activities, the alignment should avoid, to the maximum extent practicable, being located across canyons or on ridgelines. Site and design sufficient distance between transmission lines to prevent electrocution of condors.	No	Project is not located in or near the area specified in the CMA.	The Easley gen-tie line would not cross canyons or ridgelines.
	LUPA-TRANS-BIO-4	Siting of transmission activities will be prioritized within designated utility corridors, where possible, and designed to avoid, where possible, and otherwise minimize and offset impacts to sand transport processes in Aeolian corridors, rare vegetation alliances and Focus and BLM Special Status Species. Transmission substations will be sited to avoid Aeolian corridors, rare vegetation alliances, and sand-dependent Focus and BLM Special Status Species habitats.	Yes		The gen-tie line will be sited along disturbed areas using existing transmission line corridors and roads where available. The Project substation yard is not within aeolian corridors. The Project will comply with this CMA.
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.	Yes		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.	Yes		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.	Yes		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.	Yes		The CMA is an action to be taken by the BLM.

Transmission					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	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.	Yes		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 specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM.	Yes		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.
	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.	Yes		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.
Wilderness Characteristics	**LUPA-TRANS-WC-1**	Allow transmission activities in areas inventoried and identified as lands with wilderness characteristics.	No	Project is not located in or near the area specified in the CMA.	The Project would not be located on lands identified as having wilderness characteristics.
	LUPA-TRANS-WC-2	For inventoried lands found to have wilderness characteristics impacted by transmission activities, compensatory mitigation is required at a 1:1 ratio if wilderness characteristics are directly impacted. This may be accomplished through acquisition and donation, from willing landowners, to the federal government of (a) wilderness inholdings, (b) wilderness edge holdings that have inventoried wilderness characteristics, or (c) other areas within the LUPA Decision Area that are managed to protect wilderness characteristics. Restoration of impaired wilderness characteristics in Wilderness, Wilderness Study Area, and lands managed to protect wilderness characteristics could be substituted for acquisition.	No	Project is not located in or near the area specified in the CMA.	The Project would not be located on lands identified as having wilderness characteristics.

Compensation					
Category	**CMA #**	**CMA Text**	**Applicability**	**Explanation: Why CMA is not Applicable**	**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.	Yes		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.
	LUPA-COMP-2	For BLM initiated activities, compensation activities will be initiated or completed within 12 months from the time the resource impact occurs (e.g. ground disturbance, habitat removal, route obliteration, etc. for construction activities; wildlife mortality, visual impacts, etc. due to operations), subject to federal budget appropriations. ■ BLM will determine, in the environmental analysis, the activity/project-level timing of its compensation (i.e. initiated, completed or a combination) based on the specific resources being impacted, and scope and content of its activity. ○ The estimated costs and 12-month timing of required compensation will be built into the activity/project design and environmental analysis.	No	Land use does not occur on project site.	The Project is not a BLM-initiated activity.

Ecological and Cultural Conservation

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
Dune Vegetation Types, Aeolian Processes and Associated Species: North American Warm Desert Dune & Sand Flats	**CONS-BIO-DUNE-1**	All long-term structures will be setback 0.25 mile from Aeolian corridors and Mojave fringe-toed lizard suitable habitat.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
	CONS-BIO-DUNE-2	All activities will be sited and/or configured to maintain the spatial extent, habitat quality, and ecological function of Aeolian transport corridors unless related to maintenance of existing (at the time of the DRECP LUPA ROD) facilities/activities.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
		▪ Roads will not be paved, unless paving is needed to meet another resource objective and Aeolian processes can be preserved.	No	Project is not located in or near the area specified in the CMA.	
		▪ Newly constructed roads and/or routes may be considered if they benefit minimization measures for natural, cultural and ecological resources of concern.	No	Project is not located in or near the area specified in the CMA.	
Plant Focus & BLM Special Status Species	**CONS-BIO-PLANT-1**	Occurrences of plant Focus and BLM Special Status Species, including in designated transmission corridors, will be avoided, to the maximum extent practicable (see "unavoidable impacts to resources" in the Glossary of Terms).	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
Individual Focus Species: Desert Tortoise	**CONS-BIO-IFS-1**	All activities, except transmission, that will result in the long-term removal of habitat supporting an adult desert tortoise density (i.e., individuals 160mm or more) of more than 5 per square mile or more than 35 individuals total are prohibited. The number of desert tortoises on an activity site will be based on estimates derived from the protocol surveys described previously using the USFWS's pre-activity survey protocol.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
	CONS-BIO-IFS-2	All activities, except transmission, in desert tortoise TCAs or linkages, as identified in Appendix D, that will result in long-term removal of habitat supporting more than 5 adult individuals are prohibited. The number of desert tortoises on-site is based on estimates derived from the protocol surveys described previously using the USFWS's pre-activity survey protocol.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
	CONS-BIO-IFS-3	Ground disturbance caps as per **Table 20** are reflected in the individual ACEC Special Unit Management Plans and maps in Appendix B**.** Refer to the California Desert National Conservation Lands, Section II.2.1, and ACECs, Section II.2.2, for a description of how the BLM Conservation Lands Ground Disturbance Cap will be applied, including measured, activity approval and the disturbance mitigation strategy. The same implementation methodology is repeated in CMAs NLCS-DIST-2 and ACEC-DIST-2. **Table 20** provides the specific desert tortoise conservation area and linkage ground disturbance caps in the BLM LUPA conservation designations.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
Individual Focus Species: Gila Woodpecker	**CONS-BIO-IFS-4**	All activities will be avoided in the vicinity of Corn Springs and Milpitas Wash, except as administratively necessary or necessary to support existing facilities, as determined by BLM, in order to protect previously occupied and future restored suitable nesting habitat for the Gila woodpecker.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
Individual Focus Species: Golden Eagle	**CONS-BIO-IFS-5**	The cumulative loss of foraging habitat within a 4 mile radius around active or alternative golden eagle nests will be limited to less than 10% in BLM LUPA conservation designations.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
Individual Focus Species: Desert Bighorn Sheep	**CONS-BIO-IFS-6**	BLM designated routes and trails will be appropriately seasonally signed to limit use to the routes and trails, if necessary to reduce impacts from recreational use to lambing and rearing.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.

Ecological and Cultural Conservation

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
	CONS-BIO-IFS-7	For non-BLM Lessee's, domestic livestock will not be allowed to be trailed (transported on foot [herded]) through known or likely to be occupied bighorn sheep habitat, to minimize exposure and disease transmission to bighorn sheep. Vehicular movement of livestock will be allowable. Livestock will not be allowed to exit the vehicle transport, except in emergencies, while on BLM- administered land. For BLM Lessee's, consistent with existing (at time of DRECP LUPA ROD) leases and allotment plans, domestic livestock will be controlled and moved to minimize exposure and disease transmission to bighorn sheep, using techniques including but not limited to fencing with adequate buffers, vehicle transport, and timing. Vehicular movement of livestock will be allowable. Livestock will remain in the vehicle transport, except in emergencies, while on BLM-administered land, unless at the destination. For BLM grazing Lessee's, trailing of domestic sheep between discontiguous allotments, may be permittable if done in a manner, including timing, which prevents interaction with bighorn sheep and avoids disease transmission from domestic sheep to bighorn sheep. At the time of grazing allotment lease and/or allotment plan renewal, a measure to eliminate trailing within allotments (movement of domestic livestock on foot or herding) through known or likely to be occupied bighorn sheep habitat will be considered and analyzed using the best available science on domestic livestock disease transmission to bighorn sheep.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
	CONS-BIO-IFS-8	To reduce the impact on bighorn sheep from domestic livestock in grazing allotments, BLM will: ■ Accept voluntarily retirement of allotments ■ Accept donation of allotments as one component of mitigation ■ Require specific terms and conditions in renewed grazing permits, as needed ■ Consider converting domestic sheep allotments to cattle allotments ■ Consistent with existing or renewed grazing allotment plans, remove or alter livestock fencing to enhance bighorn sheep movements.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
Individual Focus Species: Mohave Ground Squirrel	**CONS-BIO-IFS-9**	Long-term vegetation removal within key population centers and linkages from activities, requiring an EA or EIS, that may impact the Mohave ground squirrel is prohibited, unless the activity is compatible with Mohave ground squirrel conservation and management. Compatible land uses are those described in the BLM LUPA for ACECs where Mohave ground squirrel occur.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
	CONS-BIO-IFS-10	To the maximum extent practicable (see Glossary of Terms) and/or as allowed under existing permits, establish and maintain fencing to exclude cattle, horses, sheep, and other potential grazers from areas that are protected and managed for Mohave ground squirrel and from vegetation stands that are important foraging habitat, including winterfat and spiny hopsage.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
Comprehensive Trails & Travel Management	**CONS-CTTM-1**	Refer to the individual California Desert National Conservation Lands and ACEC Special Unit Management Plans in Appendix A and B, respectively, for specific objecttives, management actions and allowable uses. Manage roads/trails consistent with California Desert National Conservation Lands/ACEC goals and objectives and as designated in Trails and Travel Management Plans (TTMPs) or Resource Management Plans (RMPs).	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
Recreation & Visitor Services	**CONS-REC-1**	In California Desert National Conservation Lands and ACECs that overlap with SRMAs and ERMAs, manage in accordance with the Special Unit Management Plans for the SRMA/ERMA and the applicable ecological and cultural conservation unit. If there is a conflict between the California Desert National Conservation Lands or ACEC management and the SRMA/ERMA management, the BLM will apply the most protective	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.

Ecological and Cultural Conservation					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		management (i.e., management that best supports natural and cultural resource conservation and limits impacts to the values for which the conservation unit was designated).			
	CONS-REC-2	Maintain targeted recreation activities, experiences and benefits as consistent with the protection of the values for which the ecological and cultural conservation unit was designated. Maintain, and where possible enhance, the recreation setting characteristics: physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.
	CONS-REC-3	Design public access features (access roads, roadside stops, trailheads, interpretive sites, etc.) to support or enhance conservation values for California Desert National Conservation Land units and ACECs.	No	Project is not located in or near the area specified in the CMA.	There are no Ecological and Cultural conservation areas within the Easley Project; none of these CMAs apply.

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Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
Comprehensive Trails &Travel Management	**NLCS-CTTM-1**	**Comprehensive Trails and Travel Management –** Trails and Travel Management in California Desert National Conservation Lands will be in accordance with the applicable Transportation and Travel Management Plan. Future Transportation and Travel Management Plans for National Conservation Lands would be developed in accordance to the appropriate BLM guidance and policy. The California Desert National Conservation Land designation will be addressed in those subsequent plans with an emphasis on routes that provide for the conservation, protection, and restoration, as well as recreational use and enjoyment of the California Desert National Conservation Lands that is compatible with the values for which the areas were designated.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
Cultural Resources & Tribal Interests	**NLCS-CUL-1**	Any adverse effects to historic properties resulting from allowable uses will be addressed through the Section 106 process of the National Historic Preservation Act and the implementing regulations at 36 CFR Part 800. Resolution of adverse effects will in part be addressed via alternative mitigation that includes regional synthesis and interpretation of existing archaeological data in addition to mitigation measures determined through the Section 106 consultation process.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
Ground Disturbance Caps	**NLCS-DIST-1**	**Ground Disturbance Caps –** Development in California Desert National Conservation Lands are limited by the 1% ground disturbance cap which is the total ground disturbance (existing [past and present] plus future), or to the level allowed by collocated ACEC(s) with its smaller ground disturbance cap units, whichever is more restrictive. Refer to Appendix B for the ACEC Special Unit Management Plans. The ground disturbance caps will be used, managed and implemented following the methodology in the California Desert National Conservation Lands and ACEC land allocation sections, and repeated in, **NLCS-DIST-2** and **ACEC-DIST-2**.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-DIST-2	**Ground Disturbance Cap Management and Implementation.** Specifically, the ground disturbance caps would be implemented as a limitation and objective using the following process: ■ Limitation: If the ground disturbance condition of the California Desert National Conservation Lands and/or ACEC unit is below the designated ground disturbance cap (see calculation method), the ground disturbance cap is a limitation on ground-disturbing activities within the California Desert National Conservation Lands and/or ACEC, and precludes approval of future discretionary ground disturbing activities (see exceptions below) above the cap. ■ Objective, triggering disturbance mitigation: If the ground disturbance condition of the California Desert National Conservation Lands and/or ACEC is at or above its designated cap, the cap functions as an objective, triggering the specific ground disturbance mitigation requirement. Ground disturbance mitigation is unique to ground disturbance cap implementation and a discrete form of compensatory mitigation, separate from other required mitigation in the DRECP LUPA (see Glossary of Terms). The ground disturbance mitigation requirement remains in effect for all (see exceptions below) activities until which time the California Desert National Conservation Lands and/or ACEC drops below the cap, at which time the cap becomes a limitation and the ground disturbance mitigation is no longer a requirement. If ground disturbance mitigation opportunities do not exist in a unit (see below for "unit" of measurement), ground disturbing activities (see exceptions below) will not be allowed in that unit until which time opportunities for ground disturbance mitigation in the unit become available (see types and forms of ground disturbance mitigation below) or the unit recovers and drops below the cap. ■ Actions necessary to control the immediate impacts of an emergency that are urgently needed to reduce the risk to life, property, or important natural, cultural, or historic resources, in accordance with 43 Code of Federal Regulations (CFR) 46.150, are an exception to the ground disturbance cap limitation, objective and ground disturbance mitigation requirements. Ground disturbance from emergency	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.

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Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
		actions will count in the ground disturbance calculation for other activities, and also be available for ground disturbance mitigation opportunities and restoration, as appropriate. **Calculating ground disturbance:** Ground disturbance will be calculated on BLM managed land at the time of an individual proposal, by BLM for a BLM initiated action or by a third party for an activity needing BLM approval or authorization, for analysis in the activity-specific National Environmental Policy Act (NEPA) document. Once BLM approves/accepts or conducts a calculation for a ACEC, that calculation is considered the baseline of past and present disturbance and is valid for 12 months, and can be used by other proposed activities in the same unit. Ground disturbances, that meet the criteria below, would be added into the calculation for the 12-month period without having to revisit the entire calculation. After a 12-month period has passed and a proposed action triggers the disturbance calculation, BLM will examine the existing ground disturbance calculation to determine: 1) if the calculation is still reliable, in which case add in any additional disturbance that has occurred since that calculation; or 2) if the disturbance must be recalculated in its entirety. Once completed for a specific activity, the ground disturbance calculation may be used throughout the activity's environmental analysis. However, the BLM may recalculate the affected unit(s) or portions of the unit(s) if it determines such recalculation is necessary for the BLM's environmental analysis. **Unit of measurement:** When calculating the ground disturbance, it is necessary to identify the appropriate unit level at which the disturbance will be calculated. For ground disturbing activities that occur within California Desert National Conservation Lands, the disturbance calculation will be based on the California Desert National Conservation Lands, ACEC unit boundary, or the boundary of the disturbance cap area(s), whichever area is smaller. If there is overlap between California Desert National Conservation Lands and an ACEC, the calculation will take place based on the smallest unit. If an activity/project overlaps two or more smaller units, the cap will be calculated, individually, for all affected units. **Ground disturbance includes:** The calculation shall include existing ground disturbance in addition to the estimated ground disturbance from the proposed activity (future) determined at the time of the individual proposal: ■ Authorized/approved ground disturbing activities – built and not yet built ■ BLM identified routes – all routes, trails, etc., authorized and unauthorized, identified in the Ground Transportation Linear Feature (GTLF) and/or other BLM route network database (i.e., BLM local databases that contain the best available data on routes and trails, replacement for GTLF, etc.), following applicable BLM standards and policy for identification of routes (authorized and unauthorized) ■ Assumptions may be used to identify the percentage/degree/area/etc. of ground disturbance for a specific authorized/approved activity or activity-type based on: ○ Activity-specific environmental analysis, such as NEPA or ESA Section 7 Biological Assessment ○ Known and documented patterns of ground disturbance ○ Other documented site-specific factors that limit or play a role in ground disturbance, such as topography, geography, hydrology (e.g. desert washes obliterating authorized routes on a regular basis), historical and predicted patterns of use ■ Any unauthorized disturbance that can be seen at a 1:10,000 scale using the best available aerial imagery			

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Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
		■ Ground disturbance from wildfire, animals, or other disturbances that can be seen at a 1:10,000 scale using the best available aerial imagery ■ Historic Route 66 maintenance - potential ground disturbance estimates: ○ As part of the ground disturbance calculation, the potential disturbance associated with estimated operations related to the maintenance of Historic Route 66 will automatically be included in the ground disturbance calculation as existing ground disturbance for the units specified below, until which time these estimated acres are no longer necessary due to approved operations: – South Amboy-Mojave California Desert National Conservation Lands 221 acres – Bristol Mountains ACEC 92 acres – Chemehuevi ACEC 43 acres – Pisgah ACEC 86 acres ○ The estimated ground disturbance acreage includes disturbance associated with potential access to the locations if no current access exists. ○ The estimated ground disturbance acres for maintenance of Historic Route 66 in the before mentioned conservation units is not approval of these activities by BLM. Activities associated with the management and maintenance of Historic Route 66 on BLM administered land will follow all applicable laws, regulations and policies. **Exceptions to the disturbance calculation:** ■ Actions necessary to control the immediate impacts of an emergency that are urgently needed to reduce the risk to life, property, or important natural, cultural, or historic resources, in accordance with 43 CFR 46.150, will not be required to conduct a disturbance calculation. If the actions are ground disturbing, that disturbance will count towards the disturbance cap when next calculated for non-emergency activities. ■ Actions that are authorized under a Department of Interior (DOI) or BLM NEPA Categorical Exclusion will not be required to conduct a disturbance calculation; however, these actions are not exempt from the disturbance mitigation requirement if a unit is at or above its cap. Although the BLM is not required to calculate the disturbance cap before approving an activity under a Categorical Exclusion, if the BLM knows an area is at or exceeding the cap, the disturbance mitigation requirements would apply to that activity. ■ BLM authorized/approved research or restoration activities that are designed or intended to promote and enhance the nationally significant landscape values for which the California Desert National Conservation Land was designated. ■ Actions that are entirely within the footprint of an existing authorized/approved site of ground disturbance that is within the calculation above. ■ Livestock grazing permit renewals (however, water developments or other range improvements requiring an Environmental Assessment or Environmental Impact Statement would be subject to the disturbance calculation and any mitigation requirements). **Ground disturbance mitigation:** The purpose of ground disturbance mitigation (disturbance mitigation) is to allow actions to occur in California Desert National Conservation Lands and/or ACEC that is at or above its designated disturbance cap(s), while at the same time providing a restoration mechanism that			

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Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
		will, over time, improve the condition of the unit(s) and take them below their cap. Disturbance mitigation is compensatory. Disturbance mitigation is unique to ground disturbance cap implementation and a discrete form of compensatory mitigation, separate from other required mitigation in the DRECP (see Glossary of Terms). Disturbance mitigation may only be used for ground disturbance that is otherwise allowed by the LUPA and consistent with the purposes for which the California Desert National Conservation Lands and/or ACEC was designated. Areas used for disturbance mitigation are still considered disturbed until which time they meet the "Ground Disturbance Recovery" criteria in the description below. **Unit for implementing disturbance mitigation:** The appropriate unit level for implementing disturbance mitigation is the same as that used for calculating ground disturbance. For ground disturbing activities that occur within California Desert National Conservation Lands, the disturbance mitigation will be required within the California Desert National Conservation Lands, ACEC boundary, or the boundary of the disturbance cap area(s), whichever area is smaller. If there is overlap between California Desert National Conservation Lands and an ACEC, the disturbance mitigation will take place in the smallest unit. If an activity/project overlaps two or more smaller units, disturbance mitigation will be required for all units that are at or over their specified disturbance cap. **No disturbance mitigation required:** If the calculated ground disturbance for the unit(s) is under the cap: ■ No disturbance mitigation required; use activity design features to minimize new ground disturbance and help stay below cap. **Disturbance mitigation required:** If the calculated ground disturbance is at or above the unit(s) cap, disturbance mitigation is required: ■ Use activity design features to minimize new ground disturbance to the extent practicable. ■ For the portion of the proposed activity that is located on land within an area previously disturbed by an authorized/approved action that has been terminated the required disturbance mitigation ratio is 1.5 (1½):1. ■ For the portion of the proposed activity that is located on undisturbed land or land disturbed by unauthorized activities, the required disturbance mitigation ratio is 3:1. ■ Although the BLM is not required to calculate the ground disturbance cap before approving/ authorizing an activity under a Categorical Exclusion, if the BLM knows an area is at or exceeding the cap, the disturbance mitigation requirements would apply to that activity. ■ In the rare circumstance where the BLM authorizes activities on areas restored (e.g., as disturbance or other forms of mitigation), the required disturbance mitigation ratio requirement is doubled, that is, 3:1 or 6:1, respectively. ■ If disturbance mitigation opportunities do not exist in a unit, ground-disturbing activities (see exceptions below) will not be allowed in that unit until which time opportunities for disturbance mitigation in the unit become available (see types and forms of disturbance mitigation below) or the unit recovers and drops below the cap. **Exceptions to the disturbance mitigation requirement:** ■ Any portion of the proposed activity that is located on land previously disturbed by an existing, valid authorized/approved action.			

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Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
		■ Livestock grazing permit renewals (however, water developments or other range improvements requiring an Environmental Assessment or Environmental Impact Statement would be subject to the disturbance calculation and any mitigation requirements). ■ Land use authorization assignments and renewals with no change in use. ■ BLM authorized/approved activities that are designed and implemented to reduce existing ground disturbance, such as ecological, cultural, or habitat restoration or enhancement activities. ■ Non-discretionary actions, where BLM has no authority to require compensatory mitigation. **Types and forms of disturbance mitigation:** ■ Restoration of previously disturbed BLM lands within the boundary of the specific California Desert National Conservation Lands and/or ACEC unit(s) being impacted. ■ Acquisition of undisturbed lands within the boundary of the specific California Desert National Conservation Lands and/or ACEC unit being impacted. ■ Ground disturbance mitigation can be "nested" (i.e., combined) with other resource mitigation requirements, when appropriate. For example, a parcel restored for desert tortoise habitat mitigation may also satisfy the disturbance mitigation requirement if the parcel is within the appropriate unit of California Desert National Conservation Lands, ACEC boundary, or smaller disturbance cap unit. **Ground Disturbance Recovery** In general, California Desert National Conservation Lands and/or ACEC ground disturbance recovery would be determined during the decadal ground disturbance threshold ecoregion trend monitoring assessments (see below, and Monitoring and Adaptive Management). California Desert National Conservation Lands and/or ACEC recovery may be assessed at intermediate intervals, in between the decadal assessments, at BLM's discretion based on adequate funding and staffing. Between the decadal assessments, BLM will assume disturbed areas and units (same as used for calculations and mitigation) are not yet recovered until data is presented and BLM determines the area meets one of the two criteria below: ■ Field verification that disturbed area(s) are dominated by the establishment of native shrubs, as appropriate for the site, and demonstrated function of ecological processes (e.g., water flow, soil stability). ■ Ground disturbance can no longer be seen at the 1:10,000 scale using the best available aerial imagery. Areas within California Desert National Conservation Lands and/or ACEC(s) may be determined recovered by BLM at any time, once one of the two criteria above are met, prior to the entire unit (of calculation and mitigation) being determined recovered. Areas determined recovered by BLM would be removed from the subsequent ground disturbance calculation for that unit.			
Lands & Realty	**NLCS-LANDS-1**	Renewable energy activities and related ancillary facilities are not allowed. New transmission and interconnect (i.e. generation tie lines) lines are allowed in designated corridors only. California Desert National Conservation Lands are a right-of-way avoidance areas for all other land use authorizations. Right-of-way avoidance areas are defined as areas to be avoided but may be available for location of right-of-ways with special stipulations.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-LANDS-2	Avoid use authorizations that negatively affect the values for which the California Desert National Conservation Lands are designated, unless mitigation, including compensatory mitigation, result in a net benefit to the California Desert National Conservation Lands.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.

California Desert NCL					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	NLCS-LANDS-3	Public access will be designed to facilitate or enhance the use, enjoyment, conservation, protection, and restoration of California Desert National Conservation Land values identified for the ecoregion.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-LANDS-4	All lands within California Desert National Conservation Lands are identified for retention. If the BLM determines that disposal through exchange would result in a net benefit to the values of the California Desert National Conservation Lands, it may consider that exchange through a land use plan amendment.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-LANDS-5	Site authorizations that protect or enhance conservation values, such as those granted as compensatory mitigation or for habitat restoration, are allowed. Compensatory mitigation measures sited on California Desert National Conservation Lands are not to be limited to mitigation for activities on BLM-managed public land.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
Minerals	**NLCS-MIN-1**	**High Potential Mineral Areas** ■ In California Desert National Conservation Lands and ACECs, determine if reasonable alternatives exist outside of the California Desert National Conservation Lands and ACECs prior to proposing mineral resource development within one of these areas. ■ In California Desert National Conservation Lands, subject to valid existing rights, if mineral resource development is proposed on a parcel of public land administered by the BLM for conservation purposes and designated as part of the NLCS within the CDCA, pursuant to Omnibus Public Land Management Act Section 2002(b)(2)(D): ○ Identify, analyze, and consider the resources and values for which that parcel of public land is administered for conservation purposes. ○ Determine whether development of mineral resources is compatible with the BLM's administration of that parcel of public land for conservation purposes. If development is incompatible, the mineral resource would not be developed, subject to valid existing rights. ○ Approve any operation for which valid existing rights have been determined, subject to the applicable CMAs in the DRECP LUPA, including LUPA-MIN-1 through 6. ■ In California Desert National Conservation Lands, to protect the values for which a California Desert National Conservation Land unit was designated, and avoid, minimize, and compensate impacts to those values that results in net benefit for California Desert National Conservation Lands values, all Plans of Operation will meet the performance standards found at 43 CFR 3809.420, specifically 43 CFR 3809.420(a)(3)—Land-use plans, and 43 CFR 3809.420(b)(7)—Fisheries, wildlife and plant habitat, and will be subject to the regulations found at 43 CFR 3809.100 and 43 CFR 3809.101, if applicable.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-MIN-2	For the purposes of locatable minerals, California Desert National Conservation Lands are treated as "controlled" or "limited" use areas in the CDCA, requiring a Plan of Operations for greater than casual use under 43 CFR 3809.11.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-MIN-3	California Desert National Conservation Lands are available for mineral material sales and solid mineral leases, and would require mitigation, including compensatory mitigation, that results in net benefit for California Desert National Conservation Lands values consistent with applicable statutes and regulations.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-MIN-4	California Desert National Conservation Lands are available for geothermal leasing only in the specified areas where a DRECP LUPA DFA overlaps with the California Desert National Conservation Lands and the geothermal lease contains a specific no surface occupancy stipulation.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.

California Desert NCL					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	NLCS-MIN-5	Geothermal and other leasing must protect groundwater quality and quantity.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
National Scenic & Historic Trails	**NLCS-NSHT-1**	**Management of National Scenic and Historic Trails –** Manage National Scenic and Historic Trails as units of the BLM's NLCS per PL 111-11, and components of the National Trails System under the National Trails System Act. Where National Scenic and Historic Trails overlap California Desert National Conservation Lands or other NLCS units (e.g., Wilderness Areas), the more protective CMAs or land use allocations apply.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-2	**Management Corridor –** The National Trail Management Corridor, on BLM land, has a width generally 1 mile from the centerline of the trail, 2-mile total width. Where the National Trail Management Corridors overlap California Desert National Conservation Lands or other NLCS units, the more protective CMAs or land use allocations will apply.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-3	**Site Authorization –** NSHT Management Corridors are right-of-way avoidance areas for land use authorizations. Sites authorizations will require mitigation, including compensatory mitigation resulting in net benefit to the NSHT. Authorizations that interfere with the Nature and Purpose for which the NSHT was established are not to be allowed, as required by the National Trail Systems Act.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-4	**Linear Rights-of-Way –** Generally, the NSHT Management Corridors are avoidance areas for linear rights-of-way, except in existing designated transmission/utility corridors, which are available for linear rights-of-way. Cultural landscapes, high potential historic sites, and high potential route segments within or along National Historic Trail Management Corridors are excluded from transmission activities, except in existing designated transmission/utility corridors. For all linear rights-of-way adversely impacting NSHT Management Corridors, the BLM will follow the protocol in BLM Manual 6280 to coordinate, as required, and complete an analysis showing that the development does not substantially interfere with the nature and purposes of the NSHT, and that mitigation results in a net benefit to the NSHT.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-5	**Renewable Energy Rights-of-Way –** Renewable energy activities are not to be allowed within NSHT Management Corridors, except in LUPA approved DFAs. Where development may adversely impact NSHT Management Corridors, the BLM will follow the protocol in BLM Manual 6280 as required and complete an analysis to ensure that it does not substantially interfere with the nature and purposes of the NSHT, avoids activities incompatible with NSHT nature and purposes, and that mitigation, including compensatory mitigation, results in a net benefit to the NSHT.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-6	**Land Tenure –** All lands within NSHT Management Corridors are identified for retention. If the BLM determines that disposal through exchange would result in a net benefit to the values of the NSHT, it may consider that exchange through a land use plan amendment.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-7	**Locatable Minerals –** For the purposes of locatable minerals, NSHT Management Corridors are treated as "controlled" or "limited" use areas in the CDCA, requiring a Plan of Operations for greater than casual use under 43 CFR 3809.11.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-8	**Mineral Material Sales –** NSHT Management Corridors are available for mineral material sales if the sale does not conflict or cause adverse impact on resources, qualities, values, settings, or primary uses or substantially interfere with nature and purpose of NSHT, and avoids activities inconsistent with NHST purposes. The sale must require mitigation/compensation and must result in net benefit to NSHT values.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.

California Desert NCL					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	NLCS-NSHT-9	**Solid Mineral Leases –** NSHT Management Corridors will be available for solid mineral leases if the lease does not conflict or cause adverse impact on resources, qualities, values, settings, or primary uses or substantially interfere with nature and purpose of NSHT, and avoids activities inconsistent with NHST purposes. The lease must require mitigation/compensation and result in net benefit to NSHT values.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-10	**Geothermal Leasable Minerals –** NSHT Management Corridors are available for geothermal leasing in LUPA approved DFAs only and with a no surface occupancy stipulation, as long as the action would not substantially interfere with the nature and purposes of the NSHT, and will follow the most recent national policy and guidance.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-11	**Recreation and Visitor Services –** Commercial and competitive Special Recreation is a discretionary action and will be considered on a case-by-case basis for activities consistent with the NSHT nature and purposes.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-12	**Cultural Resources –** Any adverse effects to historic properties resulting from allowable uses will be addressed through the Section 106 process of the National Historic Preservation Act and the imple-menting regulations at 36 CFR Part 800.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-13	**Cultural Resources –** All high potential NHT segments will be assumed to contain remnants, artifacts and other properties eligible for the National Register of Historic Places, pending evaluation.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-14	**Visual Resources Management –** All NSHT Management Corridors are designated as VRM Class I or II dependent on the CMA's or land use allocation, except within existing approved transmission/utility corridors (VRM Class III) and DFAs (VRM Class IV). However, state of the art VRM BMPs for renewable energy will be employed commensurate with the protection of nationally significant scenic resources and cultural landscapes to minimize the level of intrusion and protect trail settings.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-NSHT-15	**Mitigation Requirements –** If there is overlap between a National Scenic or Historic Trail, National Trail Management Corridor on BLM land, or trail under study for possible designation and a DFA, BLM Manual 6280 must be followed. Efforts will be made to avoid conflicting activities and approved activities will be subject to mitigation for adverse impacts to the resources, qualities, values, settings, and primary use or uses (RQVs), including, but not limited to, the following: avoidance, the cost of trail relocation, on-site mitigation and off-site mitigation. Compensation can include acquisition or restoration of corridor RQVs, features and landscapes will be at a minimum of 2:1, and must result in a net benefit to the overall trail corridor. Proposed development of high potential route segments must not substantially interfere with the nature and purposes of the National Scenic or Historic Trail.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
Recreation & Visitor Services	**NLCS-REC-1**	Commercial and competitive Special Recreation Permits are a discretionary action and will be issued on a case-by-case basis, for activities that do not diminish the values of the California Desert National Conservation Lands unit and will be prohibited if the proposed activities would adversely impact the nationally significant ecological, cultural or scientific values for which the area was designated.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.
	NLCS-SW-1	Apply for water rights on a case-by-case basis to protect water dependent California Desert National Conservation Land values.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in California Desert National Conservation Lands; none of these CMAs apply.

ACECs					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
Cultural Resources & Tribal Interests	**ACEC-CUL-1**	Survey, identify and record new cultural resources within ACEC boundaries prioritizing ACECs where the relevant and important criteria include cultural resources.	No	Project is not located in or near the area specified in the CMA.	The Easley Project gen-tie line terminates at the Oberon Substation and will utilize the Oberon 500 kV line to transmit the power generated by Easley from the Oberon Substation to Red Bluff Substation. Therefore, Easley will not impact the Chuckwalla ACEC south of I-10.
	ACEC-CUL-2	Update records for existing cultural resources within ACECs, prioritizing ACECs where the relevant and important criteria include cultural resources.	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.
	ACEC-CUL-3	Develop baseline assessment of specific natural and man-made threats to cultural resources in ACECs (i.e., erosion, looting and vandalism, grazing, OHV), prioritizing ACECs where the relevant and important criteria include cultural resources.	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.
	ACEC-CUL-4	Provide on-going monitoring for cultural resources based on the threat assessment, prioritizing ACECs where the relevant and important criteria include cultural resources.	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.
	ACEC-CUL-5	Identify, develop or incorporate standard protection measures and best management practices to address threats.	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.
	ACEC-CUL-6	Where specific threats are identified, implement protection measures consistent with agency NHPA Section 106 responsibilities.	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.
Ground Disturbance Cap	**ACEC-DIST-1**	Development in ACECs is limited by specified ground disturbance caps which are the total ground disturbance (existing [past and present] plus future). The specific ACEC ground disturbance caps are delineated in each of the individual ACEC Special Unit Management Plans (Appendix B). The ground disturbance caps will be used, managed and implemented following the methodology for California Desert National Conservation Lands and ACECs identified in Section II.2 and repeated in CMAs **NLCS-DIST-2**, and **ACEC-DIST-2**.	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.
	ACEC-DIST-2	Specifically, the ground disturbance caps would be implemented as a limitation and objective using the following process: ■ Limitation: If the ground disturbance condition of the ACEC is below the designated ground disturbance cap (see calculation method), the ground disturbance cap is a limitation on ground-disturbing activities within the California Desert National Conservation Lands and/or ACEC, and precludes approval of future discretionary ground disturbing activities (see exceptions below) above the cap. ■ Objective, triggering disturbance mitigation: If the ground disturbance condition of the ACEC is at or above its designated cap, the cap functions as an objective, triggering the specific ground disturbance mitigation requirement. Ground disturbance mitigation is unique to ground disturbance cap implementation and a discrete form of compensatory mitigation, separate from other required mitigation in the DRECP LUPA (see Glossary of Terms). The ground disturbance mitigation requirement remains in effect for all (see exceptions below) activities until which time the ACEC drops below the cap, at which time the cap becomes a limitation and the ground disturbance mitigation is no longer a requirement. If ground disturbance mitigation opportunities do not exist in a unit (see below for "unit" of measurement), ground disturbing activities (see exceptions below) will not be allowed in that unit until which	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.

ACECs					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		time opportunities for ground disturbance mitigation in the unit become available (see types and forms of ground disturbance mitigation below) or the unit recovers and drops below the cap. ■ Actions necessary to control the immediate impacts of an emergency that are urgently needed to reduce the risk to life, property, or important natural, cultural, or historic resources, in accordance with 43 Code of Federal Regulations (CFR) 46.150, are an exception to the ground disturbance cap limitation, objective and ground disturbance mitigation requirements. Ground disturbance from emergency actions will count in the ground disturbance calculation for other activities, and also be available for ground disturbance mitigation opportunities and restoration, as appropriate. **Calculating ground disturbance:** Ground disturbance will be calculated on BLM managed land at the time of an individual proposal, by BLM for a BLM initiated action or by a third party for an activity needing BLM approval or authorization, for analysis in the activity-specific National Environmental Policy Act (NEPA) document. Once BLM approves/accepts or conducts a calculation for a ACEC, that calculation is considered the baseline of past and present disturbance and is valid for 12 months, and can be used by other proposed activities in the same unit. Ground disturbances, that meet the criteria below, would be added into the calculation for the 12 month period without having to revisit the entire calculation After a 12 month period has passed and a proposed action triggers the disturbance calculation, BLM will examine the existing ground disturbance calculation to determine: 1) if the calculation is still reliable, in which case add in any additional disturbance that has occurred since that calculation; or 2) if the disturbance must be recalculated in its entirety. Once completed for a specific activity, the ground disturbance calculation may be used throughout the activity's environmental analysis. However, the BLM may recalculate the affected unit(s) or portions of the unit(s) if it determines such recalculation is necessary for the BLM's environmental analysis. **Unit of measurement:** When calculating the ground disturbance, it is necessary to identify the appropriate unit level at which the disturbance will be calculated. For ground disturbing activities that occur within an ACEC, the disturbance calculation will be based on the ACEC unit boundary, or the boundary of the disturbance cap area(s), whichever area is smaller. If there is overlap between California Desert National Conservation Lands and an ACEC, the calculation will take place based on the smallest unit. If an activity/project overlaps two or more smaller units, the cap will be calculated, individually, for all affected units. **Ground disturbance includes:** The calculation shall include existing ground disturbance in addition to the estimated ground disturbance from the proposed activity (future) determined at the time of the individual proposal: ■ Authorized/approved ground disturbing activities – built and not yet built ■ BLM identified routes – all routes, trails, etc., authorized and unauthorized, identified in the Ground Transportation Linear Feature (GTLF) and/or other BLM route network database (i.e., BLM local databases that contain the best available data on routes and trails, replacement for GTLF, etc.), following applicable BLM standards and policy for identification of routes (authorized and unauthorized) ■ Assumptions may be used to identify the percentage/degree/area/etc. of ground disturbance for a specific authorized/approved activity or activity-type based on: ○ Activity-specific environmental analysis, such as NEPA or ESA Section 7 Biological Assessment ○ Known and documented patterns of ground disturbance			

ACECs					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		○ Other documented site-specific factors that limit or play a role in ground disturbance, such as topography, geography, hydrology (e.g. desert washes obliterating authorized routes on a regular basis), historical and predicted patterns of use ■ Any unauthorized disturbance that can be seen at a 1:10,000 scale using the best available aerial imagery ■ Ground disturbance from wildfire, animals, or other disturbances that can be seen at a 1:10,000 scale using the best available aerial imagery ■ Historic Route 66 maintenance - potential ground disturbance estimates: ○ As part of the ground disturbance calculation, the potential disturbance associated with estimated operations related to the maintenance of Historic Route 66 will automatically be included in the ground disturbance calculation as existing ground disturbance for the units specified below, until which time these estimated acres are no longer necessary due to approved operations: – South Amboy-Mojave California Desert National Conservation Lands 221 acres – Bristol Mountains ACEC 92 acres – Chemehuevi ACEC 43 acres – Pisgah ACEC 86 acres ○ The estimated ground disturbance acreage includes disturbance associated with potential access to the locations if no current access exists. ○ The estimated ground disturbance acres for maintenance of Historic Route 66 in the before mentioned conservation units is not approval of these activities by BLM. Activities associated with the management and maintenance of Historic Route 66 on BLM administered land will follow all applicable laws, regulations and policies. **Exceptions to the disturbance calculation:** ■ Actions necessary to control the immediate impacts of an emergency that are urgently needed to reduce the risk to life, property, or important natural, cultural, or historic resources, in accordance with 43 CFR 46.150, will not be required to conduct a disturbance calculation. If the actions are ground disturbing, that disturbance will count towards the disturbance cap when next calculated for non-emergency activities. ■ Actions that are authorized under a Department of Interior (DOI) or BLM NEPA Categorical Exclusion will not be required to conduct a disturbance calculation; however, these actions are not exempt from the disturbance mitigation requirement if a unit is at or above its cap. Although the BLM is not required to calculate the disturbance cap before approving an activity under a Categorical Exclusion, if the BLM knows an area is at or exceeding the cap, the disturbance mitigation requirements would apply to that activity. ■ BLM authorized/approved research or restoration activities that are designed or intended to promote and enhance the relevant and important values for which the ACEC was designated. ■ Actions that are entirely within the footprint of an existing authorized/approved site of ground disturbance that is within the calculation above.			

ACECs					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
		■ Livestock grazing permit renewals (however, water developments or other range improvements requiring an Environmental Assessment or Environmental Impact Statement would be subject to the disturbance calculation and any mitigation requirements). **Ground disturbance mitigation:** The purpose of ground disturbance mitigation (disturbance mitigation) is to allow actions to occur in California Desert National Conservation Lands and/or ACEC that is at or above its designated disturbance cap(s), while at the same time providing a restoration mechanism that will, over time, improve the condition of the unit(s) and take them below their cap. Disturbance mitigation is compensatory. Disturbance mitigation is unique to ground disturbance cap implementation and a discrete form of compensatory mitigation, separate from other required mitigation in the DRECP (see Glossary of Terms). Disturbance mitigation may only be used for ground disturbance that is otherwise allowed by the LUPA and consistent with the purposes for which the California Desert National Conservation Lands and/or ACEC was designated. Areas used for disturbance mitigation are still considered disturbed until which time they meet the "Ground Disturbance Recovery" criteria in the description below. **Unit for implementing disturbance mitigation:** The appropriate unit level for implementing disturbance mitigation is the same as that used for calculating ground disturbance. For ground disturbing activities that occur within an ACEC, the disturbance mitigation will be required within the ACEC unit boundary, or the boundary of the disturbance cap area(s), whichever area is smaller. If there is overlap between California Desert National Conservation Lands and an ACEC, the disturbance mitigation will take place in the smallest unit. If an activity/project overlaps two or more smaller units, disturbance mitigation will be required for all units that are at or over their specified disturbance cap. **No disturbance mitigation required:** If the calculated ground disturbance for the unit(s) is under the cap: ■ No disturbance mitigation required; use activity design features to minimize new ground disturbance and help stay below cap. **Disturbance mitigation required:** If the calculated ground disturbance is at or above the unit(s) cap, disturbance mitigation is required: ■ Use activity design features to minimize new ground disturbance to the extent practicable. ■ For the portion of the proposed activity that is located on land within an area previously disturbed by an authorized/approved action that has been terminated the required disturbance mitigation ratio is 1.5 (1½):1. ■ For the portion of the proposed activity that is located on undisturbed land or land disturbed by unauthorized activities, the required disturbance mitigation ratio is 3:1. ■ Although the BLM is not required to calculate the ground disturbance cap before approving/ authorizing an activity under a Categorical Exclusion, if the BLM knows an area is at or exceeding the cap, the disturbance mitigation requirements would apply to that activity. ■ In the rare circumstance where the BLM authorizes activities on areas restored (e.g., as disturbance or other forms of mitigation), the required disturbance mitigation ratio requirement is doubled, that is, 3:1 or 6:1, respectively. ■ If disturbance mitigation opportunities do not exist in a unit, ground-disturbing activities (see exceptions below) will not be allowed in that unit until which time opportunities for disturbance mitigation			

ACECs

Category	CMA #	CMA Text	Applicability	Explanation: Why CMA is not Applicable	Comments
		in the unit become available (see types and forms of disturbance mitigation below) or the unit recovers and drops below the cap. **Exceptions to the disturbance mitigation requirement:** ■ Any portion of the proposed activity that is located on land previously disturbed by an existing, valid authorized/approved action. ■ Livestock grazing permit renewals (however, water developments or other range improvements requiring an Environmental Assessment or Environmental would be subject to the disturbance calculation and any mitigation requirements). ■ Land use authorization assignments and renewals with no change in use. ■ BLM authorized/approved activities that are designed and implemented to reduce existing ground disturbance, such as ecological, cultural, or habitat restoration or enhancement activities. ■ Non-discretionary actions, where BLM has no authority to require compensatory mitigation. **Types and forms of disturbance mitigation:** ■ Restoration of previously disturbed BLM lands within the boundary of the specific ACEC unit(s) being impacted. ■ Acquisition of undisturbed lands within the boundary of the specific ACEC unit being impacted. ■ Ground disturbance mitigation can be "nested" (i.e., combined) with other resource mitigation requirements, when appropriate. For example, a parcel restored for desert tortoise habitat mitigation may also satisfy the disturbance mitigation requirement if the parcel is within the appropriate unit of California Desert National Conservation Lands, ACEC boundary, or smaller disturbance cap unit. **Ground Disturbance Recovery** In general, California Desert National Conservation Lands and/or ACEC ground disturbance recovery would be determined during the decadal ground disturbance threshold ecoregion trend monitoring assessments (see below, and Monitoring and Adaptive Management). California Desert National Conservation Lands and/or ACEC recovery may be assessed at intermediate intervals, in between the decadal assessments, at BLM's discretion based on adequate funding and staffing. Between the decadal assessments, BLM will assume disturbed areas and units (same as used for calculations and mitigation) are not yet recovered until data is presented and BLM determines the area meets one of the two criteria below: ■ Field verification that disturbed area(s) are dominated by the establishment of native shrubs, as appropriate for the site, and demonstrated function of ecological processes (e.g., water flow, soil stability). ■ Ground disturbance can no longer be seen at the 1:10,000 scale using the best available aerial imagery. Areas within California Desert National Conservation Lands and/or ACEC(s) may be determined recovered by BLM at any time, once one of the two criteria above are met, prior to the entire unit (of calculation and mitigation) being determined recovered. Areas determined recovered by BLM would be removed from the subsequent ground disturbance calculation for that unit.			
Lands & Realty	**ACEC-LANDS-1**	Renewable energy activities are not allowed. ACECs are right-of-way avoidance areas for all other land use authorizations, except when identified as right-of-way exclusion areas in the individual unit's Special Management Plan (Appendix B). Transmission is allowed. Re-powering of an existing wind facility is allowed if the re-power project remains within the existing approved wind energy ROW and reduces environmental impacts.	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.

ACECs					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	ACEC-LANDS-2	All lands within Areas of Critical Environmental Concern are identified for retention. If the BLM determines that disposal through exchange would result in a net benefit to the values of the ACEC, it may consider that exchange through a land use plan amendment.	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.
Minerals	**ACEC-MIN-1**	**High Potential Mineral Areas** ■ In California Desert National Conservation Lands and ACECs, determine if reasonable alternatives exist outside of the California Desert National Conservation Lands/ACEC areas prior to proposing mineral resource development within one of these areas.	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.
	ACEC-VRM-1	Manage Manzanar ACEC to conform to VRM Class II standards.	No	Project is not located in or near the area specified in the CMA.	The Easley Project will not impact the Chuckwalla ACEC.

Wildlife Allocation					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
Lands & Realty	**WILD-LANDS-1**	Renewable energy activities and related ancillary facilities are not allowed.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in a Wildlife Allocation; therefore, none of these CMAs apply.
	WILD-LANDS-2	Applications for use authorizations that provide a benefit to the management area or serve public interests may be allowed, unless prohibited by statute.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in a Wildlife Allocation; therefore, none of these CMAs apply.
	WILD-LANDS-3	Use authorization applications, excluding renewable energy projects and related ancillary facilities, will be evaluated in accordance with whether they are compatible with and not contrary to the wildlife values or the protection and enhancement of wildlife and plant habitat for that Allocation.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in a Wildlife Allocation; therefore, none of these CMAs apply.
	WILD-LANDS-4	All lands within Wildlife Allocations are identified for retention. If the BLM determines that disposal through exchange would result in a net benefit to the values of the Wildlife Allocation, it may consider that exchange through a land use plan amendment.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in a Wildlife Allocation; therefore, none of these CMAs apply.

SRMAs					
Category	**CMA #**	**CMA Text**	**Applicability**	**Explanation: Why CMA is not Applicable**	**Comments**
Biological Resources-Vegetation	**SRMA-VEG-1**	Vegetative Use Authorizations: Commercial collection of seed is an allowable use in designated OHV Open Areas. CMAs within SRMAs apply to this kind of activity	No	Project not located on federal lands with this designation.	The Project does not include commercial collection of seed.
Comprehensive Trails and Travel Management	**SRMA-CTTM-1**	Refer to the individual SRMA Special Unit Management Plans (Appendix C) for SRMA/Recreation Management Zone specific objectives, management actions, and allowable uses. Protect SRMAs for their unique/special recreation values. Manage roads/primitive roads/trails consistent with SRMA objectives and as designated in Transportation and Travel Management Plan/RMPs.	No	Project is not located in or near the area specified in the CMA.	The Chuckwalla SRMA, which contains the Chuckwalla Mountains Wilderness Area, is located south of I-10 by the Red Bluff Substation. The Easley gen-tie line would interconnect to the Oberon Project Substation, thus, would not be located within a SRMA.
Lands and Realty	**SRMA-LANDS-1**	Renewable energy development is not an allowable use in SRMAs due to the incompatibility with the values of the SRMA. Two exceptions to this management action are:	No	Project is not located in or near the area specified in the CMA.	The Project would not develop renewable energy in a SRMA. The Chuckwalla SRMA, which contains the Chuckwalla Mountains Wilderness Area, is located south of I-10 by the Red Bluff Substation. The Easley gen-tie line would interconnect to the Oberon Project Substation, thus, would not be located within a SRMA.
		▪ Geothermal development is an allowable use if a geothermal-only DFA overlays the SRMA designation and complies with a "no surface occupancy" restriction; with exception of the Ocotillo Wells SRMA (refer to the technology specifics for the DFA and the Special Unit Management Plan in Appendix C)	No	Project not located on federal lands with this designation.	
		▪ If DRECP variance land designation overlays the SRMA, renewable energy may be allowed on a case-by-case basis if the proposed project is found to be compatible with recreation values and the Special Unit Management Plan (Appendix C) specific to the SRMA.	No	Project not located on federal lands with this designation.	
		Re-powering of an existing wind facility is allowed if the re-power project remains within the existing approved ROW and reduces environmental and recreation impacts.	No	Project not located on federal lands with this designation.	
	SRMA-LANDS-2	Acquired land within the SRMAs will be managed according to the goals and objectives of the SRMA, and activities on these lands will be consistent with the CMAs for SRMAs.	No	Land use does not occur on project site.	The Project does not include acquired lands except as compensation. Such lands would be managed per the agreement with the BLM and the resources protected.
	SRMA-LANDS-3	Lands within SRMAs are available for disposal. However, disposal actions are only available to parties that will manage the land in accordance with the recreational values identified in the Special Unit Management Plan (Appendix C) for the SRMA.	No	Project is not associated with a land exchange.	The Project does not include disposal of lands.
Recreation & Visitor Services	**SRMA-REC-1**	Manage SRMAs for their targeted recreation activities, experiences and benefits. 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.	No	Project is not located in or near the area specified in the CMA.	The Chuckwalla SRMA, which contains the Chuckwalla Mountains Wilderness Area, is located south of I-10 by the Red Bluff Substation. The Easley gen-tie line would interconnect to the Oberon Project Substation, thus, would not be located within a SRMA.
	SRMA-REC-2	In SRMAs that overlap with California Desert National Conservation Lands and ACECs, manage in accordance with the Special Unit Management Plans for the SRMA/ERMA and the applicable ecological and cultural conservation unit (Appendices A, B, and C). If there is a conflict between the California Desert National Conservation Lands or ACEC management and the SRMA/ERMA management, the BLM will apply the most protective management (i.e., management that best supports natural and cultural resource conservation and limits impacts to the values for which the conservation unit was designated).	No	Project not located on federal lands with this designation.	This CMA is direction to the BLM regarding management of SRMAs.
	SRMA-REC-3	SRMA objectives and desired recreation setting characteristics described in the Special Unit Management Plans (Appendix C) may be refined and/or zoned in activity-level planning, based on visitor-use surveys and other monitoring.	No	Project not located on federal lands with this designation.	This CMA is direction to the BLM regarding management of SRMAs.

SRMAs					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
Visual Resources Management	**SRMA-VRM-1**	Manage the Alabama Hills SRMA to conform to VRM Class II standards.	No	Project is not located in or near the area specified in the CMA.	The Project is not located within the Alabama Hills SRMA.

ERMAs					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
General	**ERMA-LUPA-1**	Renewable energy activities and related ancillary facilities are not allowed where an ERMA overlaps with California Desert National Conservation Lands, ACEC, or Wildlife Allocation, or is not allowed in a specific ERMA as described in the Special Unit Management Plan (see Appendix C).	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in an Extensive Recreation Management Area; none of these CMAs apply.
	ERMA-LUPA-2	In areas where renewable energy activities and related ancillary facilities are an allowable use, the CMAs related to renewable energy activities and related ancillary facilities for General Public Lands apply (refer to Section II.4.2.10), including but not limited to:	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in an Extensive Recreation Management Area; none of these CMAs apply.
		■ Renewable energy activities and related ancillary facilities that may have a measurable (i.e., the effect can be evaluated) adverse impact (direct, indirect or cumulative)on the biological or cultural conservation strategies, including individual California Desert National Conservation Lands, ACEC and/or Wildlife Allocation units of the DRECP LUPA are not allowed.	No	Project not located on federal lands with this designation.	
		■ Renewable energy activities and related ancillary facilities that may have a measurable (i.e., the effect can be evaluated) adverse impact (direct, indirect or cumulative) on the recreation design, including individual SRMAs and ERMAs, of the DRECP LUPA are not allowed.	No	Project not located on federal lands with this designation.	
		■ Renewable energy activities and related ancillary facilities that may have a measurable (i.e., the effect can be evaluated) adverse impact (direct, indirect, or cumulative) on the renewable energy and transmission design, including individual DFAs and VPLs, are not allowed.	No	Project not located on federal lands with this designation.	
Recreation and Visitor Services	**ERMA-REC-1**	When considering land use authorizations within ERMAs, retain to the extent practicable recreation activities and associated qualities and conditions within these areas.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located in an Extensive Recreation Management Area; none of these CMAs apply.

DFAs and VPLs					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
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.	Yes		The Easley Project does not include dune vegetation. The Project will comply with this CMA.
	DFA-VPL-BIO-DUNE-2	Within Aeolian corridors that transport sand to dune formations and vegetation types downwind inside and outside of the DFAs, all activities will be designed and operated to facilitate the flow of sand across activity sites, and avoid the trapping or diverting of sand from the Aeolian corridor. Buildings and structures within the site will take into account the direction of sand flow and, to the extent feasible, build and align structures to allow sand to flow through the site unimpeded. Fences will be designed to allow sand to flow through and not be trapped.	No	Project is not located in or near the area specified in the CMA.	The Easley Project does not include dune sand transport corridors.
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.	Yes		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.
Mohave Ground Squirrel	**DFA-VPL-BIO-IFS-2**	Within the Mohave ground squirrel range configure solar panel and wind turbine arrays to allow areas of native vegetation that will facilitate Mohave ground squirrel movement through the project site. This may include raised and/or rotating solar panels or open space between rows of panels or turbines. Fences surrounding sites should be permeable for Mohave ground squirrels.	No	Project not within the range or habitat of this species.	The Easley Project is outside of the range of the Mohave ground squirrel.
Bats	**DFA-VPL-BIO-BAT-1**	Wind projects will not be sited within 0.5 mile of any occupied or presumed occupied maternity roost.	No	Land use does not occur on project site.	The Project is not a wind project.
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.	Yes		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.	Yes		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.

DFAs and VPLs					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	DFA-VPL-BIO-COMP-2	Exception to the biological resources standard compensation ratio of 1:1 - desert tortoise intact linkage habitat compensation ratio of 2:1 applies to the identified modeled intact linkage habitat (Appendix D) in two linkages—Ord-Rodman critical habitat unit to Joshua Tree National Park, and Fremont-Kramer critical habitat unit to the Ord-Rodman critical habitat unit, as identified in Appendix D. Maintenance and enhancement of the function of these two linkages is essential to the function of the Ord-Rodman critical habitat unit.	No	Project is not located in or near the area specified in the CMA.	The Project is not within the desert tortoise linkages noted in the CMA.
Comprehensive Trails and Travel Management	**DFA-VPL-CTTM-1**	Avoid Tier 1, Tier 2, Tier 3 roads/primitive roads/trails, Backcountry Byways, and other significant linear features (as defined in the LUPA-wide CMAs). If avoidance is not practicable, relocate access to the same or higher standard and maintain the recreation setting characteristics and access to recreation activities, facilities, and destination.	No	Land use does not occur on project site.	The Easley Project would not impact access to recreational areas. Existing open routes that cross through the Project to other resources would remain open and accessible. Some routes that do not lead to recreational areas may be closed – an implementation decision for the BLM.
	DFA-VPL-CTTM-2	If residual impacts to Tier 1 and Tier 2 roads/primitive roads/trails, Backcountry Byways, or other significant linear features cannot be protected and maintained, commensurate compensation in the form of an enhanced recreation operations, recreation facilities or opportunities will be required.	No	Resource not found on the project site	No residual effects to Tier 1 and Tier 2 roads would occur.
Cultural Resources and Tribal Interests		BLM developed and maintains a geodatabase for Cultural Resources and Cultural Resources investigations in a GIS. The geodatabase is regularly updated with newly recorded and re-recorded resource and investigation data. However, while the geodatabase includes location information (feature classes or shapefiles), the associated information about each resource or investigation (attribute data) is limited or inconsistent. As it exists now, the geodatabase cannot be used for predictive analyses like those recommended in *A Strategy for Improving Mitigation Policies and Practices of the Department of the Interior* (DOI 2014). However, with some updates, the geodatabase will be a powerful tool for identifying potential conservation priorities as well as development opportunities. Many of the CMAs below are intended to facilitate the update of BLM's geodatabase, and require its use when the updates are complete. The following CMAs are for renewable energy and transmission land use authorizations only, in DFAs and VPLs. All other activities in DFAs and VPs are subject to the NHPA Section 106 process.			
	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.	Yes		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	Yes		This may be accomplished through mitigation measures developed through the Section 106 or NEPA process. The Project will comply with this CMA.

DFAs and VPLs

Category	CMA #	CMA Text	Applicability	Explanation: Why CMA is not Applicable	Comments
		commensurate to the size and regional 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.	Yes		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.	Yes		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.	Yes		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.	Yes		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.	Yes		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.
Livestock Grazing	**DFA-VPL-LIVE-1**	Avoid siting solar developments in active livestock grazing allotments. If a ROW is granted for solar development in an active livestock grazing allotment, prior to solar projects being constructed in active livestock allotments, an agreement must be reached with the grazing permittee/lessee on the 2-year notification requirements. If any rangeland improvements such as, but not limited to, fences, corrals, or water storage projects, are to be impacted by energy projects, reach agreement with the BLM and the grazing permittee/lessee on moving or replacing the range improvement. This may include the costs for NEPA, clearances, and materials.	No	Land use does not occur on project site.	There are no active livestock grazing allotments on the Easley site.
	DFA-VPL-LIVE-2	In California Condor use areas, wind energy ROWs will include a term and condition requiring the permittee and wind operator to eliminate grazing of livestock.	No	Project is not located in or near the area specified in the CMA.	The Project is not within condor use areas.
	DFA-VPL-LIVE-3	Include no surface occupancy stipulation on geothermal leases in active grazing allotments.	No	Project is not located in or near the area specified in the CMA.	The Project is not located on geothermal leases.
Vegetation	**DFA-VPL-VEG-1**	Vegetative Use Authorizations: Commercial collection of seed in DFAs and VPLs is an allowable use. CMA's within these areas apply to this kind of activity.	No	Land use does not occur on project site.	The Project does not entail commercial collection of seed; however, all revegetation will be performed per a Vegetation Resources Management Plan that requires seed collection from the Project site, or if unavailable, acquired from other native seed suppliers."

DFAs and VPLs

Category	CMA #	CMA Text	Applicability	Explanation: Why CMA is not Applicable	Comments
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.	Yes		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).	Yes		The Project will implement BMPs, as necessary, to comply with this CMA.
	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, campgrounds, 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	Yes		The Project will implement BMPs, as necessary, to comply with this CMA.

Development Focus Areas

Category	CMA #	CMA Text	Applicability	Explanation: Why CMA is not Applicable	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 Clearinghouse stating that military impacts have been mitigated. ■ 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.	Yes		The DRECP LUPA Appendix E states that solar PV present little to no conflict to military operations. The Project will comply with this CMA.
Biological Resources	**DFA-BIO-IFS-1**	Conduct the following surveys as applicable in the DFAs as shown in **Table 21**.	Yes		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.
	DFA-BIO-IFS-2	Implement the following setbacks shown below in **Table 22** as applicable in the DFAs.	Yes		The Project will comply, as applicable, with the setbacks listed in this CMA (see also mitigation measures developed during the NEPA process).
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. Preconstruction 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.	Yes		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. No live desert tortoise or active desert tortoise sign were observed during the surveys. Implementation of mitigation measures developed during the NEPA process and the Desert Tortoise Protection and Relocation Plan (POD Appendix I) will minimize impacts to desert tortoise.
Mohave Ground Squirrel	**DFA-BIO-IFS-4**	The DFA in the "North of Edwards" Mohave ground squirrel key population center is closed to renewable energy applications and any activity that is likely to result in the mortality (killing) of a Mohave ground squirrel until Kern and San Bernardino counties complete county General Plan amendments/updates that include renewable energy development and Mohave ground squirrel conservation on nonfederal land in the West Mojave ecoregion and the CDFW releases a final Mohave Ground Squirrel Conservation	No	Project not within the range or habitat of this species.	The Project is located outside of the Mohave ground squirrel range.

Development Focus Areas

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
		Strategy, or for a period of 5 years after the signing of the DRECP LUPA ROD, whichever comes first. If Kern and San Bernardino counties and CDFW do not complete their respective plans within the 5-year period, prior to opening the DFA to renewable energy applications and other impacting activities, BLM will assess new Mohave ground squirrel information, in coordination with the CDFW, to determine if modifications to the DFA or CMAs are warranted based on new Mohave ground squirrel information.			
	DFA-BIO-IFS-5	Once the planning criteria in CMA **DFA-BIO-IFS-4**, are met, the DFA in the "North of Edwards" Mohave ground squirrel key population center will be reevaluated. If Kern and San Bernardino counties receive Mohave ground squirrel take authorizations from the CDFW through completed Natural Community Conservation Plans or county-wide conservation strategies that address Mohave ground squirrel conservation at a landscape level and include renewable energy development areas on nonfederal land in the West Mojave ecoregion, the "North of Edwards" key population center DFA will be eliminated and the management changed to General Public Lands, as part of adaptive management.	No	Project not within the range or habitat of this species.	The Project is located outside of the Mohave ground squirrel range.
Plants	**DFA-BIO-PLANT-1**	Impact to suitable habitat (see Glossary of Terms) for the following plant Focus Species within the DRECP Plan Area will be capped (see "DFA Suitable Habitat Impacts Cap" in the Glossary of Terms) in the DFAs as described below and in **Table 23**. The suitable habitat impact cap for these plant species is to be measured in DFAs as a group, not individually. Triple-ribbed milk-vetch is an avoidance species in DFAs, therefore none of its suitable habitat is to be impacted.	No	Project not within the range or habitat of this species.	The Project is located outside of the geographic range of all species listed in the CMA.
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).	Yes		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-2	Avoid large-scale ground disturbance within one-half mile of Level 3 Recreation facility footprint including route access and staging areas. If avoidance isn't practicable, the facility must be relocated to the same or higher standard and maintain recreation objectives and setting characteristics.	No	Project is not located in or near the area specified in the CMA.	The nearest Level 3 Recreation facility is the Corn Springs Road kiosk, which is beyond one-half mile from the Project.
	DFA-REC-3	SRMAs are exclusion areas for renewable energy development due to the incompatibility with the values of SRMAs. Two exceptions to this management action are: 1. geothermal development is an allowable use in the few instances in Imperial County where a geothermal-only DFA overlays the SRMA designation and the lease includes a "no surface occupancy" stipulation, with exception of three specific parcels in the Ocotillo Wells SRMA (the Special Unit Management Plan in Appendix C) 2. the VPL at Antimony Flat in Kern County overlaying the SRMA, renewable energy may be allowed on a case-by-case basis if the proposed project is found to be compatible with the specific SRMA values.	No	Project is not located in or near the area specified in the CMA.	The Project would not develop renewable energy in a SRMA.
	DFA-REC-4	When considering large-scale development in DFAs, retain to the extent possible existing, approved recreation activities.	Yes		The Project is in a DFA, but would not impact approved, recre-ation 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 dis-placement results in resource damage due to increased use in other areas, mitigate that damage through whatever measures are most appropriate as determined by the Authorized Officer.	Yes		The Project would not displace recreation opportunities as the Project area is infrequently used for recreation.

Development Focus Areas					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	DFA-REC-6	Where activities in DFAs displace authorized facilities, similar new recreation facilities/campgrounds (including but not limited to the installation of new structures including pit toilets, shade structures, picnic tables, installing interpretive panels, etc.), will be provided.	No	Land use does not occur on project site.	The Project would not displace authorized facilities.
	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 signing materials to be placed at strategic locations along the new touring route, if determined to be appropriate by BLM.	Yes		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.
	DFA-REC-8	Impacts from activities in a DFA to Special Recreation Permit activities will be mitigated by providing necessary planning and NEPA compliance documentation for Special Recreation Permit replacement activities, as determined appropriate on a case-by case basis.	No	Land use does not occur on project site.	The Project would not impact Special Recreation Permit activities.
	DFA-REC-9	If residual impacts to SRMAs occur from activity impacts in a DFA, commensurate mitigation through relocation or replacement of facilities or compensation (in the form of a recreation operations and enhancement fund) will be required.	No	Project is not located in or near the area specified in the CMA.	The Project in the DFA would not have residual impacts to the SRMA.
	DFA-REC-10	Within ERMAs, impacts from development projects that do not enhance conservation or recreation goals will require commensurate mitigation through relocation or replacement of facilities.	No	Project is not located in or near the area specified in the CMA.	The Project would not occur within an ERMA.
Lands and Realty	**DFA-LANDS-1**	Lands within DFAs are available for disposal.	No	Project is not associated with a land exchange.	The Project is not proposing lands for disposal
	DFA-LANDS-2	Development of acquired lands within DFAs is allowed, at the discretion of the BLM California State Director, unless development is incompatible with the purposes of the acquisition and any applicable deed restrictions.	No	Land use does not occur on project site.	The Project would not occur on acquired lands.
	DFA-LANDS-3	Lands proposed for exchange in DFAs will be segregated from the public land laws for 5 years, but wind, solar, geothermal and transmission applications and their associated facilities are allowed.	No	Project is not associated with a land exchange.	The Project would not propose land exchanges.
	DFA-LANDS-4	Review withdrawn lands in DFAs upon receipt of a ROW application and if appropriate modify to allow for issuance of ROW grants.	No	Project is not associated with a land exchange.	The Project would not occur on withdrawn lands and would be designed to be compatible with any ROW that cross the site.
	DFA-LANDS-5	Cost recovery funding used to process a ROW application may be used to adjudicate and remedy any conflicting land withdrawals, if necessary.	No	Project is not associated with a land exchange.	No conflicting land withdrawals are necessary.
	DFA-LANDS-6	Make public lands in DFAs available for selection by the CSLC in lieu of base lands within DFAs. Base lands are School Lands the State of California was entitled to but did not receive title to due to prior existing encumbrances.	No	Project is not associated with a land exchange.	The Project would not involve any CSLC land exchanges.
	DFA-LANDS-7	Transmission facilities are an allowable use and will not require a plan amendment within DFAs.	Yes		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.	Yes		The Project will implement BMPs, as necessary, to comply with this CMA.

Development Focus Areas					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	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).	Yes		The Project is located on land with VRI Class IV, so no mitigation is required. The Project will comply with this CMA.
Wild Horses and Burros	**DFA-WHB-1**	Incorporate all guidance provided by the Wild Free-Roaming Horses and Burros Act of 1971, its amendments, associated regulations, and any pertinent court rulings into the project/activity proposal, as appropriate.	No	Resource not found on the project site	There are no wild horses or burros on the Project.
	DFA-WHB-2	Development that would reduce burros' access to forage, water, shelter, or space or impede their wild, free-roaming behavior in Herd Management Area is not allowed	No	Resource not found on the project site	There are no wild horses or burros on the Project.
	DFA-WHB-3	Mitigation can only occur on lands that the animals were found at the passage of the Wild Free-Roaming Horses and Burros Act of 1971. Expansion of the boundaries of a Herd Management Area back into the Herd Areas would require a land use plan amendment, the cost of which would be incurred by the applicant proposing to develop in the Herd Management Area, if part of the proposed mitigation package.	No	Resource not found on the project site	There are no wild horses or burros on the Project.
Wilderness Characteristics	**DFA-WC-1**	Renewable energy activities are allowed in DFAs that have been inventoried and identified as lands with wilderness characteristics.	No	Resource not found on the project site	There are no lands with wilderness characteristics on the Project.
	DFA-WC-2	For inventoried lands found to have wilderness characteristics in DFAs, compensatory mitigation is required at a 1:1 ratio if wilderness characteristics are directly impacted. This may be accomplished through acquisition and donation, from willing landowners, to the federal government of (a) wilderness inholdings, (b) wilderness edge holdings that have inventoried wilderness characteristics, or (c) other areas within the LUPA Decision Area that are managed to protect wilderness characteristics. Restoration of impaired wilderness characteristics in Wilderness, Wilderness Study Area, and lands managed to protect wilderness characteristics could be substituted for acquisition.	No	Resource not found on the project site	There are no lands with wilderness characteristics on the Project.

Variance Process Lands

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
Renewable Energy	**LUVPL-BIO-RE-1**	All renewable energy activities, during the planning phase, must establish baseline conditions for Focus and BLM Special Status bird and bat species using protocols and methodologies approved by BLM in coordination with USFWS, and CDFW as appropriate.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on Variance Process Lands; none of these CMAs apply.
	VPL-BIO-RE-2	As part of a renewable energy activity proposal that may affect bird and bat Focus and BLM Special Status Species, a proven (e.g., peer reviewed) technology solution to bird and bat Focus and BLM Special Status Species injury and mortality must be incorporated into the activity design and operation as a mandatory element.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on Variance Process Lands; none of these CMAs apply.
	VPL-BIO-RE-3	As part of a renewable energy activity proposal that may conflict with Department of Defense operations, a proven (e.g., peer reviewed) technology solution to Department of Defense conflicts must be incorporated as a mandatory element.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on Variance Process Lands; none of these CMAs apply.
	VPL-BIO-RE-4	Each utility-scale renewable energy activity must result in a no net increase in ground disturbance within the specific ROW grant area.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on Variance Process Lands; none of these CMAs apply.
	VPL-BIO-RE-5	The VPL at Antimony Flat in Kern County will remain as a VPL or be removed based on consistency with the Kern County General Plan Update. If removed, renewable energy activities would no longer be an allowable use in the SRMA.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on Variance Process Lands; none of these CMAs apply.
Lands & Realty	**VPL-LANDS-1**	Lands within VPLs are available for disposal.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on Variance Process Lands; none of these CMAs apply.
Recreation & Visitor Services	**VPL-REC-1**	The VPL at Antimony Flat in Kern County will remain as a VPL or be removed based on consistency with the Kern County General Plan Update. If removed, renewable energy activities would no longer be an allowable use in the SRMA.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on Variance Process Lands; none of these CMAs apply.
Visual Resources Management	**VPL-VRM-1**	Manage all Variance Process Lands as VRM Class III.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on Variance Process Lands; none of these CMAs apply.
	VPL-VRM-2	Regional mitigation is required for visual impacts in VPLs. Mitigation will be based on the VRI class and the underlying visual values (scenic quality, sensitivity, and distance zone) for the development area as it stands at the time the ROD is signed for the DRECP. 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 VPLs: ■ VRI Class II 2:1 ratio ■ VRI Class III 1:1 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).	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on Variance Process Lands; none of these CMAs apply.

General Public Lands

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
	GPL-1	DRECP LUPA Biological and Cultural Conservation Design – Activities that may have a measurable (i.e. the effect can be evaluated) adverse impact (direct, indirect or cumulative) on the biological or cultural conservation strategies, including individual California Desert National Conservation Lands, ACEC and/or Wildlife Allocation units of the DRECP LUPA are not allowed.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-2	DRECP LUPA Recreation Design - Activities that may have a measurable (i.e. the effect can be evaluated) adverse impact (direct, indirect or cumulative) on the recreation design, including individual SRMAs and ERMAs, of the DRECP LUPA are not allowed.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-3	DRECP LUPA Renewable Energy and Transmission Design - Activities that may have a measurable (i.e. the effect can be evaluated) adverse impact (direct, indirect, or cumulative) on the renewable energy and transmission design, including individual DFAs and VPLs, are not allowed.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-4	Renewable Energy Activities – A renewable energy activity that is not transmission aligned (see Glossary of Terms), as per the DRECP energy development design, is not allowed.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-5	DRECP LUPA – Activities that may have a measurable (i.e. the effect can be evaluated) adverse impact (direct, indirect, or cumulative) on the LUPA-wide structure, and implementation of the DRECP LUPA are not allowed.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
Comprehensive Trails and Travel Management	**GPL-CTTM-1**	Avoid Tier 1, Tier 2, Tier 3 roads/primitive roads/trails, Backcountry Byways, and other significant linear features (as defined in the LUPA-wide CMAs). If avoidance is not practicable, relocate access to the same or higher standard and maintain the recreation setting characteristics and access to recreation activities, facilities, and destination.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-CTTM-2	If residual impacts to Tier 1 and Tier 2 roads/primitive roads/trails, Backcountry Byways, or other significant linear features cannot be protected and maintained, commensurate compensation in the form of an enhanced recreation operations, recreation facilities or opportunities will be required. The following CMAs are for renewable energy and transmission land use authorizations. All other activities will be subject to the NHPA Section 106 process.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
Cultural Resources and Tribal Interests	**GPL-CUL-1**	For renewable energy activities and transmission, the applicant is required to pay all appropriate costs associated with the following processes, through the appropriate BLM funding mechanism: ■ 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.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-CUL-2	For renewable energy activities and transmission, management fee, defined at a per acre rate and annual escalation provision for the life of the grant, will paid to the BLM as partial mitigation for the cumulative effects on cultural resources across the DRECP Plan Area and may be used to develop regional research designs and other forms of off-site and compensatory mitigation.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.

General Public Lands

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
	GPL-CUL-3	For renewable energy activities and transmission, the management fee rate will be determined through the NHPA programmatic Section 106 consultation process that will be completed as part of the DRECP LUPA.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-CUL-4	For renewable energy activities and transmission, applicant must demonstrate that results of cultural resources sensitivity, based on the DRECP geodatabase, and other sources, are used as part of the initial planning pre-application process and to select of specific footprints for further consideration.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-CUL-5	For renewable energy activities and transmission, applicants will provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-CUL-6	For renewable energy activities and transmission, applicants will provide justification in the application why the project considerations merit moving forward if the specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-CUL-7	For renewable energy activities and transmission, applicants will complete the NHPA Section 106 Process as specified in 36 CFR Part 800, or via an alternate procedure, allowed for under 36 CFR Part 800.14 prior to issuing a ROD or ROW grant on any utility-scale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement, if applicable.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
Lands and Realty	**GPL-LANDS-1**	Lands within GPL are unavailable for disposal.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-LANDS-2	Cost recovery funding used to process a ROW application may be used to adjudicate and remedy any conflicting land withdrawals, if necessary.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
Livestock Grazing	**GPL-LIVE-1**	Avoid siting solar developments in active livestock grazing allotments. If a ROW is granted for solar development in an active livestock grazing allotment, prior to solar projects being constructed in active livestock allotments, an agreement must be reached with the grazing permittee/lessee on the 2-year notification requirements. If any rangeland improvements such as, but not limited to, fences, corrals, or water storage projects, are to be impacted by energy projects, reach agreement with the BLM and the grazing permittee/lessee on moving or replacing the range improvement. This includes the costs for NEPA, clearances, and materials.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-LIVE-2	In California condor use areas, wind energy ROWs will include a term and condition requiring the permittee and wind operator to eliminate grazing of livestock.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-LIVE-3	A no surface occupancy stipulation will be included on geothermal leases in active grazing allotments.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
Recreation and Visitor Services	**GPL-REC-1**	Retain, to the extent possible, the identified recreation setting characteristics: physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls (see recreation setting characteristics matrix).	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.

General Public Lands					
Category	**CMA #**	**CMA Text**	**Applica-bility**	**Explanation: Why CMA is not Applicable**	**Comments**
	GPL-REC-2	Avoid large-scale ground disturbance within one-half mile of Level 3 Recreation facility footprint including route access and staging areas. If avoidance isn't practicable, the facility must be relocated to the same or higher standard and maintain recreation objectives and setting characteristics.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-REC-3	When considering large-scale development in the GPL areas, retain to the extent possible existing, approved recreation activities. **GPL Recreation Mitigation Measures** If impacts to recreation opportunities or setting characteristics identified in RMPs, or activity plans for designated recreation areas (SRMA, ERMA, OHV Areas, etc.), from proposed activities are identified, one or more of the following mitigation measures will be applied.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
GPL Recreation Mitigation Measures	**GPL-REC-4**	For displacement of dispersed recreation opportunities, commensurate compensation in the form of enhanced recreation operations, recreation facilities or opportunities will be required. If recreation displacement results in resource damage due to increased use in other areas, mitigate that damage through whatever measures are most appropriate as determined by the Authorized Officer.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-REC-5	Where activities displace authorized facilities, similar new recreation facilities/campgrounds (including but not limited to the installation of new structures including pit toilets, shade structures, picnic tables, installing interpretive panels, etc.), will be provided.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-REC-6	If designated vehicle routes are directly impacted by activities (includes modification of existing route to accommodate industrial equipment, restricted access or full closure of designated route, pull outs, and staging area's to the public, etc.), mitigation will include the development of alternative routes to allow for continued vehicular access with proper signage, with a similar recreation experience. In addition, mitigation will also include the construction of an "OHV touring route" which circumvents the activity area and allows for interpretive signing materials to be placed at strategic locations along the new touring route, if determined to be appropriate by the Authorized Officer.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-REC-7	Impacts from third-party activities to authorized Special Recreation Permit activities will be mitigated by providing necessary planning and NEPA compliance documentation for Special Recreation Permit replacement activities, as determined appropriate on a case-by-case basis.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-REC-8	If residual impacts to SRMAs occur from third party activity impacts in GPLs areas, commensurate mitigation through relocation or replacement of facilities or compensation (in the form of a recreation operations and enhancement fund) will be required.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-REC-9	Within ERMAs, impacts from third-party development projects that do not enhance conservation or recreation goals will require commensurate mitigation through relocation or replacement of facilities.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
Visual Resources Management	**GPL-VRM-1**	Development in GPLs is required to incorporate visual design standards and include the best available, most recent BMPs, as determined by BLM (e.g. Solar, Wind, West Wide Energy Corridor, and Geothermal PEISs, the Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands, and other programmatic BMP documents).	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.

General Public Lands

Category	CMA #	CMA Text	Applica-bility	Explanation: Why CMA is not Applicable	Comments
	GPL-VRM-2	**Required Visual Resource BMPs.** All development will abide by the BMPs addressed in the most recent version of the document "*Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands"* or its replacement, including, but not limited to the following: ■ 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, campgrounds, 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.	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.
	GPL-VRM-3	Regional mitigation is required for visual impacts in GPLs. Mitigation will be based on the VRI class and the underlying visual values (scenic quality, sensitivity, and distance zone) for the development area as it stands at the time the ROD is signed for the DRECP. Compensation may involve reclamation of visual impacts that are present within other areas designated as BLM VRM Class I or II lands (so that they are no longer visible in the long term), mitigation on BLM lands inventoried as having equal to or greater visual resource values, or amending RMP for lands located within VRM Class III or IV to a higher level of protection (VRM Class I or II) for areas that are visually intact with no cultural modifications and have visual resource inventoried values that are equal to or greater in value and place a protective Visual ACEC delineated around the compensatory mitigated area. The following mitigation ratios will be applied: ■ VRI Class II 2:1 ratio ■ VRI Class III 1:1 ratio ■ VRI Class IV no mitigation required Additional mitigation will be required where projects affect viewsheds of specially designated areas (e.g., National Scenic and Historic Trails).	No	Project is not located in or near the area specified in the CMA.	The Easley Project is not located on General Public Lands; none of these CMAs apply.

Dropdown Info		
Col	**Col**	**Notes**
Yes	Project not within the range or habitat of this species.	
No	Resource not found on the project site.	e.g., recreation CMAs that reference Tier 1 or 2 roads, and other specific rec resources
	Land use does not occur on project site.	e.g., grazing, mining, wild horses or burros etc.
	Project not located on federal lands with this designation.	e.g., ACEC, NLCS, etc.
	Resource is not within the buffer identified in the CMA.	For things like the rec and cultural buffers
	Project is not located in or near the area specified in the CMA.	Some CMAs are specific to Regions or FOs
	Project is not associated with a land exchange.	