



U.S. Department of the Interior
Bureau of Land Management

County of Riverside
Planning Department



Desert Quartzite Solar Project

FINAL **Plan Amendment/ Environmental Impact Statement/ Environmental Impact Report**

DOI-BLM-CA-D060-2017-0002
CA State Clearinghouse No. 2015031066

September 2019

**Estimated Lead Agency Total
Costs Associated with Developing
and Producing This EIS**

\$1.23 million

**Desert Quartzite Solar Project
Final Plan Amendment
Environmental Impact Statement/
Environmental Impact Report**

Lead Agencies:

Federal - U.S. Department of Interior, Bureau of Land Management (BLM)
State of California - Riverside County, California

BLM Proposed ROW Grant CACA-049397

State Clearinghouse Number 2015031066

September 2019

The BLM manages more land – 253 million acres – than any other Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western States, including Alaska. The Bureau, with a budget of about \$1 billion, also administers 700 million acres of subsurface mineral estate throughout the nation. The BLM's multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.

DOI-BLM-CA-D060-2017-0002

**Palm Springs South Coast Field Office
Desert Quartzite Solar Project
Final California Desert Conservation Area (CDCA) Plan Amendment/Environmental
Impact Statement/Environmental Impact Report for the Desert Quartzite Solar Project
Proposed Right-of-Way (ROW) Grant CACA-049397**

Lead Agency: Bureau of Land Management (BLM)
Palm Springs / South Coast Field Office
1201 Bird Center Drive, Palm Springs, CA 92262

ABSTRACT

The Palm Springs South Coast Field Office of the BLM has prepared this Final Proposed Plan Amendment (PA) to the California Desert Conservation Area (CDCA) Plan/Environmental Impact Statement/Environmental Impact Report (Final PA/EIS/EIR), which analyzes the environmental impacts of the proposed Desert Quartzite Solar Project (DQSP; the Project). The Project is described in right-of-way (ROW) grant application number CACA-049397 filed with the BLM by First Solar Development, LLC (the Applicant), a wholly-owned subsidiary of First Solar Development, Inc. The Project area under application for BLM approval is approximately 5,115 acres. In addition to the BLM ROW application, the Applicant submitted a Conditional Use Permit (CUP) Application to the County of Riverside on February 25, 2015 (Riverside County CUP No. 3721), for 160 acres of privately-owned land adjacent to the BLM-administered land. Within this application area, the Applicant has proposed a Project that would occupy approximately 3,770 acres. This includes 3,560 acres for the portion of the solar facility on BLM land; 54 acres for the proposed 230 kilovolt (kV) transmission line (generation interconnection [gen-tie] line) on BLM land, 2 acres for the offsite portion of a buried telecommunications line and possible above-ground electrical service line on BLM land, and 154 acres for the portion of the solar facility on private land. The larger acreage under application allows for the BLM and the County to consider various site layouts as Project alternatives for their environmental analysis. If approved, the final proposed ROW grant for the Project would be 3,616 acres of BLM land, and the County authorization for use of the private land would cover 154 acres.

The Final PA/EIS/EIR evaluates the potential effects of the Proposed Action, two other action alternatives, and a No Action Alternative on BLM-administered lands and privately-owned lands under the County's jurisdiction. The Final PA/EIS/EIR will be used by BLM to render a decision on whether to deny, grant, or grant with modifications the requested ROW, and by the County to render a decision on issuing a CUP. In addition to the decision on the ROW application, the BLM is considering associated amendments to the CDCA Plan to accommodate the Proposed Action. The PA decisions considered in the Final PA/EIS are:

PA1: The CDCA Plan would be amended to identify the development footprint as suitable for the proposed type of solar energy use. This would be adopted if a ROW were granted for the Project, the Resource Avoidance Alternative, or the Reduced Project Alternative.

PA2: The CDCA Plan would be amended to authorize a portion of the gen-tie corridor that is located outside of BLM's Utility Corridor K and Section 368 Federal Energy Corridor 30-52. This would be adopted if a ROW were granted for the Project, the Resource Avoidance Alternative, or the Reduced Project Alternative.

PA3: The CDCA Plan would be amended to close 6.8 miles of routes that currently exist within the project area. This would be adopted if a ROW were granted for the Project, the Resource Avoidance Alternative, or the Reduced Project Alternative.

If these three decisions are not taken, the CDCA Plan would not be amended. This would result if the No Action Alternative were selected.

The Field Manager of the Palm Springs South Coast Field Office has the authority for site management of future activities related to ROW Grant CACA-049397 and is the BLM Authorized Officer for this Final PA/EIS/EIR.



United States Department of the Interior BUREAU OF LAND MANAGEMENT

Palm Springs South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262
www.blm.gov/california



August 2019

Dear Reader:

Attached for your review is the Final Environmental Impact Statement/Environmental Impact Report and Proposed California Desert Conservation Area (CDCA) Plan Amendment (Final EIS/EIR) for the Desert Quartzite Solar Project (DQSP) issued by the Bureau of Land Management (BLM) Palm Springs–South Coast Field Office and the County of Riverside. The BLM prepared this document in accordance with the National Environmental Policy Act of 1969, as amended; the Federal Land Policy and Management Act of 1976, as amended, implementing regulations; the BLM’s Land Use Planning Handbook (H-1601-1); the California Environmental Quality Act of 1970; and other applicable law and policy. The BLM will base its implementation and land use plan decisions on the analysis contained in this EIS/EIR.

The Project is described in right-of-way (ROW) grant application number CACA-049397 filed with the BLM by First Solar Development, LLC (the Applicant), a wholly-owned subsidiary of First Solar Development, Inc. In addition to the BLM ROW application, the Applicant submitted a Conditional Use Permit (CUP) Application to the County of Riverside on February 25, 2015 (Riverside County CUP No. 3721), for 160 acres of privately-owned land adjacent to the BLM-administered land. Within this application area, the Applicant has proposed a Project that would occupy approximately 3,770 acres. The plan amendment/Environmental Impact Statement/Environmental Impact Report (PA/EIS/EIR) for the development of the DQSP and supporting information is available on the project web site at: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=68211&dctmId=0b0003e880d8c579>

The Draft EIS/EIR was published August 10, 2018, initiating a 90-day comment period that ended November 8, 2018. A public meeting was held in Palm Desert and Blythe, California, during the comment period. Appendix Z of the Final EIS/EIR includes all comments received and appendix AA contains the responses to the comments.

This Final EIS/EIR is not a decision document. Copies of the EIS/EIR have been sent to affected Federal, tribal, state, and local government agencies.

Copies are available for public inspection at the following BLM locations:

BLM Palm Springs–South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

BLM California Desert District Office
22835 Calle San Juan De Los Lagos
Moreno Valley, CA 92553

Copies are also available for public inspection at the following county location:

Riverside County Planning Department
4080 Lemon Street
Riverside, CA 92502-1409

Pursuant to the BLM's planning regulations at 43 CFR 1610.5-2, any person who participated in the planning process for the Proposed CDCA Plan Amendment and has an interest which is or may be adversely affected by the planning decisions may protest approval of the planning decisions contained therein. The Final EIS and Proposed CDCA Plan Amendment are open for a 30-day protest period following the date the Environmental Protection Agency publishes its Notice of Availability in the *Federal Register*.

The regulations specify the required elements of your protest. Take care to document all relevant facts. As much as possible, reference or cite the planning documents or available planning records (e.g. meeting minutes or summaries, correspondence, etc.).

Emailed protests will not be accepted as valid protests unless the protesting party also provides the original letter by either regular mail or overnight delivery postmarked by the close of the protest period. Under these conditions, the BLM will consider the emailed protest as an advanced copy and will afford it full consideration. If you wish to provide the BLM with such advance notification, please direct emailed protests to: protest@blm.gov.

All protests must be in writing and mailed to one of the following addresses: Regular

Mail:

Director (210)
Attn: Protest Coordinator
P.O. Box 71383
Washington, DC 20024-1383

Overnight Delivery:

Director (210)
Attn: Protest Coordinator
20 M Street SE, Room 2134LM
Washington, DC 20003

All protests must be postmarked on or before the close of the protest period.

Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment — including your personal identifying information — may be made publicly available at any

time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

The BLM Director will make every attempt to promptly render a decision on each protest. The decision will be in writing and will be sent to the protesting party by certified mail, return receipt requested. The decision of the BLM Director shall be the final decision of the Department of the Interior on each protest. Responses to protest issues will be compiled and formalized in a Director's Protest Resolution Report made available following issuance of the decisions.

Upon resolution of all land use plan protests, the BLM will issue a Record of Decision (ROD). The ROD will be available to all parties on the project website.

Unlike land use planning decisions, implementation decisions included in this Final EIS/EIR are not subject to protest under the BLM planning regulations, but are subject to an administrative review process, through appeals to the Office of Hearings and Appeals (OHA), Interior Board of Land Appeals (IBLA) pursuant to 43 CFR, Part 4 Subpart E. Implementation decisions generally constitute the BLM's final approval allowing on-the-ground actions to proceed. Where implementation decisions are made as part of the land use planning process, they are still subject to the appeals process or other administrative review as prescribed by specific resource program regulations once the BLM resolves the protests to land use planning decisions and issues a ROD.

Thank you for your continued interest in the EIS/EIR for the Desert Quartzite Solar Project. We appreciate the information and suggestions you contribute to the planning process. For additional information or clarification regarding this document or the planning process, please contact Brandon G. Anderson, BLM Project Manager, at (951) 697-5215 or blm.ca.desert.quartzite.solar.project.blm.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Herrema".

Douglas J. Herrema
Field Manager
BLM Palm Springs-South Coast Field Office

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EXECUTIVE SUMMARY

ES.1 Introduction and Background

This Final Proposed Plan Amendment (PA) to the California Desert Conservation Area (CDCA) Plan/Environmental Impact Statement/Environmental Impact Report (Final PA/EIS/EIR) analyzes impacts of the Desert Quartzite Solar Project (DQSP; the Project). The Project is described in the right-of-way (ROW) grant application number CACA-049397 filed with the Bureau of Land Management (BLM), and the Application for Land Use and Development/Conditional Use Permit (CUP) 03721 filed with the Riverside County Planning Department, by First Solar Development, LLC (the Applicant), a wholly-owned subsidiary of First Solar Development, Inc. The Applicant proposes to construct, operate, maintain, and decommission the DQSP in the southern California inland desert. The Project would generate up to 450 megawatts (MW) using solar photovoltaic (PV) technology.

The ROW grant application was originally filed for 7,245 acres on September 28, 2007, but has been revised since that time. The Project addressed in this Final PA/EIS/EIR is described in the most recent Plan of Development (POD), dated November 16, 2016. The Applicant has also filed a Conditional Use Permit Application (Application for Land Use and Development, Form 295-1010, CUP No. 03721) with Riverside County (the County) for authorization to develop a portion of the Project on privately-owned land adjacent to the BLM-administered land. The total Project area under application for BLM and County approval is approximately 5,275 acres. Of this, the application for the BLM ROW grant includes approximately 5,115 acres of BLM administered lands, and the application for a County Conditional Use Permit includes 160 acres of private lands. Within this application area, the Applicant has proposed a Project that would occupy approximately 3,770 acres. This includes 3,560 acres for the portion of the solar facility on BLM land; 54 acres for the proposed 230 kilovolt (kV) transmission line (generation interconnection [gen-tie] line) on BLM land, 2 acres for the offsite portion of a buried telecommunications line and possible above-ground electrical service line on BLM land, and 154 acres for the portion of the solar facility on private land. The larger acreage under application allows for the BLM and the County to consider various site layouts as Project alternatives for their environmental analysis. If approved, the final proposed ROW grant for the Project would be 3,616 acres of BLM land, and the County authorization for use of the private land would cover 154 acres.

Although the Notice of Intent (NOI) To Prepare an Environmental Impact Statement for the Desert Quartzite Solar Project and a Possible Amendment to the California Desert Conservation Area Plan, 80 Fed. Reg. 12195 (March 6, 2015) stated that the Project would be capable of generating 300 MW, advances in photovoltaic (PV) solar technology will allow the installation of additional megawatts on the same footprint proposed in the applicable POD.

This Final PA/EIS/EIR was prepared as a joint Federal/state environmental document that analyzes the impacts of the Project under both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). This document analyzes the effects of the proposed Project on the solar facility site and gen-tie line corridor and, as appropriate, surrounding areas.

ES.2 CDCA Plan Amendment

The BLM's action also will include consideration of a concurrent amendment of the CDCA Plan. The CDCA Plan, while recognizing the potential compatibility of solar generation facilities on public lands, requires that all sites associated with power generation or transmission that are not identified in the CDCA Plan be added to it through the PA process.

The Record of Decision signed by Secretary of the Interior Ken Salazar for the Solar Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States (the "Western Solar Plan") (BLM 2012) identified the DQSP ROW application area as part of the Riverside East Solar Energy Zone (SEZ) and thus, available for solar development for all but pending projects. Pending projects (such as the DQSP) still require a project-specific PA. Similarly, pursuant to Section II.3.2.4 of the Desert Renewable Energy Conservation Plan (DRECP), the DRECP does not apply to "[a] project that is proposed in a BLM SEZ and that is considered a 'pending project' under the Western Solar Plan (the project application was filed before June 30, 2009)." The initial project application was filed before June 30, 2009, the Project is located within a SEZ, and the amendments contemplated by the Desert Quartzite Solar PV proposal either do not affect the project boundaries (e.g., change in project developer) or are related to avoiding resource or land use conflicts or adapting the Project to third-party-owned infrastructure constraints. Therefore, the Desert Quartzite Solar PV proposal is being processed under the CDCA land use plan decisions in place prior to the adoption of the DRECP LUPA and Western Solar Plan. Therefore, if the BLM decides to approve the issuance of a ROW grant for the DQSP, a PA also would be required.

The Western Solar Plan designates approximately 248,000 acres of BLM administered land as Solar Energy Zones (SEZs) in six southwestern states. These SEZs are designated as locations that are well suited for utility-scale production of solar energy, and where BLM would prioritize solar development on Federal lands. The Riverside East SEZ in eastern Riverside County consists of approximately 148,000 acres of land. The Project is located within the Riverside East SEZ, but it is not subject to the Western Solar Plan because it is a "pending project" (a project in a SEZ with an application filed before June 30, 2009).

ES.3 Summary Description of the Proposed Action and Alternatives

The DQSP would be located approximately 2.75 miles southwest of the City of Blythe, just south of the Interstate 10 (I-10) freeway, and 1.5 miles southwest of Blythe Airport in Riverside County, California (Figure 2-1). The Project area associated with the Proposed Action (Alternative 1) after construction would occupy 3,616 acres of BLM land, and 154 acres of private land under the jurisdiction of the County of Riverside. The BLM land would include 3,560 acres for the solar facility, 54 acres for the 2.79-mile long gen-tie line, and 2 acres for the offsite portion of a buried telecommunications line and possible above-ground electrical service line on BLM land. The Project would include 61 acres of temporary construction areas, all on BLM land, for the solar arrays and gen-tie line. Additional appurtenances to be constructed on the Project area would include an Operations and Maintenance (O&M) building, On-Site Substation, internal access roads, and ancillary facilities. The primary ingress and egress to the Project would use existing access roads. The secondary access route would require construction of approximately 0.7 miles of new road near the southeastern boundary of the Project.

In addition to the Proposed Action (Alternative 1), the Final PA/EIS/EIR also analyzes alternatives to the Project, including a Resource Avoidance Alternative that would support a 450 MW solar PV facility (Alternative 2), a Reduced Project Alternative that would support a 285 MW solar PV facility (Alternative 3), and a No Action Alternative (Alternative 4) as required by NEPA and CEQA.

The Resource Avoidance Alternative was developed to specifically avoid the locations of cultural and biological resources, as well as drainages and watercourses. The Resource Avoidance Alternative would generate up to 450 MW, and would occupy a land area of 2,768 acres, including 2,608 acres on BLM land and 160 acres of private land. Under the Resource Avoidance Alternative, the length of the gen-tie line would be 3.94 miles. The BLM has identified Alternative 2: Resource Avoidance Alternative as the Agency Preferred Alternative, and the County has identified Alternative 2 as the environmentally superior alternative among the action alternatives, pending analysis of public comments on the Final PA/EIS/EIR.

The Reduced Project Alternative further reduces the acreage of the solar arrays, with elimination of the proposed solar arrays primarily in the northern portion of the area to maintain habitat for the Mojave fringe-toed lizard and Harwood's eriastrum, a BLM Sensitive Species plant. The Reduced Project Alternative would generate 285 MW, and would occupy a land area of 2,033 acres, including 1,873 acres on BLM land and 160 acres of private land. Under the Reduced Project Alternative, the length of the gen-tie line would be 3.94 miles.

Under the No Action Alternative, the BLM would deny the Applicant's ROW grant application and no PA would be required.

ES.4 Environmental Consequences

Table ES-1 summarizes the environmental impacts that would occur as a result of the Proposed Action and Alternatives by environmental resource. Table ES-2 summarizes the significance of impacts under CEQA.

Table ES-1. Comparison of Impacts by Alternative

Resource	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action Alternative
Air Resources				
Construction and Decommissioning Emissions	Potential temporary exceedances of the Mojave Desert Air Quality Management District (MDAQMD) daily and annual thresholds for NO _x , PM ₁₀ , and PM _{2.5} , the PM ₁₀ <i>de minimis</i> level, and state and Federal Ambient Air Quality Standards (AAQS) for PM ₁₀ in a non-attainment area.	Potential temporary exceedances of the MDAQMD daily and annual thresholds for NO _x , PM ₁₀ , and PM _{2.5} , the PM ₁₀ <i>de minimis</i> level, and state and Federal AAQS for PM ₁₀ in a non-attainment area.	Potential temporary exceedances of the MDAQMD daily and annual thresholds for NO _x , PM ₁₀ , and PM _{2.5} , the PM ₁₀ <i>de minimis</i> level, and state and Federal AAQS for PM ₁₀ in a non-attainment area.	No emissions
Potential health impacts to sensitive receptors and workers	No sensitive receptors within 1,000 feet. Low potential for worker exposure to valley fever through exposure to dust.	No sensitive receptors within 1,000 feet. Low potential for worker exposure to valley fever through exposure to dust.	No sensitive receptors within 1,000 feet. Low potential for worker exposure to valley fever through exposure to dust.	No potential impacts
Operation and Maintenance Emissions	No exceedances	No exceedances	No exceedances	No emissions
Biological Resources – Vegetation				
<i>Parkinsonia florida</i> - <i>Olneya tesota</i> alliance	0 acres	0 acres	0 acres	0 acres
<i>Larrea tridentata</i> and <i>Larrea tridentata</i> - <i>Ambrosia dumosa</i> Alliances	3,575 acres	2,605 acres	1,870 acres	0 acres
<i>Pleuraphis rigida</i> alliance	40.4 acres	2.3 acres	2.3 acres	0 acres
State jurisdictional waters and wetlands	26.2 acres	0.39 acres ⁵	0.36 acres ⁵	0 acres
Federal jurisdictional waters and wetlands	0 acres	0 acres	0 acres	0 acres
Abrams' spurge	2,021 individuals	1 individuals	0 individuals	0 individuals
Desert unicorn-plant	584 individuals	300 individuals	315 individuals	0 individuals
Harwood's eriastrum	510 individuals	202 individuals	202 individuals	0 individuals

Table ES-1. Comparison of Impacts by Alternative

Resource	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action Alternative
Harwood's eriastrum (habitat)	110 acres of occupied habitat 3,660 acres of potential habitat	19.6 acres of occupied habitat 2,748 acres of potential habitat	18.2 acres of occupied habitat 2,015 acres of potential habitat	0 acres of occupied habitat 0 acres of potential habitat
Harwood's milkvetch	23,078 individuals	22,165 individuals	22,165 individuals	0 individuals
Ribbed cryptantha	18,159 individuals	4,146 individuals	4,156 individuals	0 individuals
Utah vine milkweed	0 individuals	0 individuals	0 individuals	0 individuals
Biological Resources – Wildlife				
Long-term habitat disturbance	3,770 acres	2,768 acres	2,033 acres	0 acres
Temporary habitat disturbance ¹	61 acres	64 acres	66.1 acres	0 acres
Mojave desert tortoise (tracks)	1 individual	1 individual	1 individual	0 individuals
Mojave desert tortoise (habitat)	3,575 acres	2,605 acres	1,870 acres	0 acres
Mojave fringe-toed lizard (individuals)	135 individuals	35 individuals	35 individuals	0 individuals
Mojave fringe-toed lizard (habitat)	78 acres of occupied habitat 3,692 acres of potential habitat	12 acres of occupied habitat 2,756 acres of potential habitat	12 acres of occupied habitat 2,021 acres of potential habitat	0 acres of occupied habitat 0 acres of potential habitat
Kit fox (den)	6 dens	5 dens	4 dens	0 dens
Burrowing owl/American badger/kit fox (habitat)	3,831 acres	2,833 acres	2,099 acres	0 acres
Golden eagle (foraging habitat)	3,831 acres	2,833 acres	2,099 acres	0 acres
Cultural Resources				
National Register of Historic Places (NRHP)- and California Register of Historical Resources (CRHR)-Eligible archaeological resources directly adversely affected	10 sites	0 sites	0 sites	0 sites

Table ES-1. Comparison of Impacts by Alternative

Resource	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action Alternative
NRHP- and CRHR-Eligible archaeological resources indirectly adversely affected	0 sites	0 sites	0 sites	0 sites
Environmental Justice				
Disproportionate effects on Environmental Justice populations	No effect	No effect	No effect	No effect
Geology and Soils				
Geologic hazards	Minor risk from seismic hazards, subsidence and settlement, and hydrocompaction. Minor risk from corrosive soils.	Minor risk from seismic hazards, subsidence and settlement, and hydrocompaction. Minor risk from corrosive soils.	Minor risk from seismic hazards, subsidence and settlement, and hydrocompaction. Minor risk from corrosive soils.	No risk
Disturbed soils potentially eroded	3,831 acres	2,833 acres	2,099 acres	0 acres
Climate Change²				
CO _{2e} emissions avoided by displacing gas-fired generation	787,500 MT CO _{2e} /year	787,500 MT CO _{2e} /year	496,125 MT CO _{2e} /year	0 MT CO _{2e} /year
Total project annualized CO _{2e} emissions	1,317 MT CO _{2e} /year	1,317 MT CO _{2e} /year	1,290 MT CO _{2e} /year	0 MT CO _{2e} /year
Loss of carbon uptake	5,670 MT CO _{2e} /year	4,193 MT CO _{2e} /year	3,107 MT CO _{2e} /year	0 MT CO _{2e} /year
Hazards and Hazardous Materials				
Release of hazardous materials	Potential releases of fuels and other hazardous materials could result in soil and/or groundwater contamination.	Potential releases of fuels and other hazardous materials could result in soil and/or groundwater contamination.	Potential releases of fuels and other hazardous materials could result in soil and/or groundwater contamination.	No risk
Site security	Mitigated minor security risks, “low vulnerability” site	Mitigated minor security risks, “low vulnerability” site	Mitigated minor security risks, “low vulnerability” site	No risk

Table ES-1. Comparison of Impacts by Alternative

Resource	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action Alternative
Civil Aviation safety	Airport Compatibility Zone E overlain by 416 acres. Potential glint and glare from PV panels.	Airport Compatibility Zone E overlain by 290 acres. Potential glint and glare from PV panels.	Airport Compatibility Zone E overlain by 34 acres. Potential glint and glare from PV panels.	No effect
DoD Aviation Safety	No impact to Special Use Airspace (SUAs) or Military Training Routes (MTRs)	No impact to SUAs or MTRs.	No impact to SUAs or MTRs.	No effect
Lands and Realty				
Impacts to authorized uses	None	None	None	None
Nonconformance with CDCA Plan	None	None	None	None
Nonconformance with Multiple Use Class M guidelines	None	None	None	None
Restriction of MUC-M land use opportunities	3,616 acres	2,608 acres	1,873 acres	0 acres
Mineral Resources				
Potential impact to mineral extraction ³	3,616 acres	2,608 acres	1,873 acres	0 acres
Noise				
Construction and decommissioning noise	Noise levels at nearest sensitive receptor may increase beyond the 10 dBA standard. Impact would be mitigated by orienting post installation equipment.	Noise levels at nearest sensitive receptor may increase beyond the 10 dBA standard. Impact would be mitigated by orienting post installation equipment.	Noise levels at nearest sensitive receptor may increase beyond the 10 dBA standard. Impact would be mitigated by orienting post installation equipment.	No impact
Operations noise	Noise levels at nearest sensitive receptor would not increase beyond the 10 dBA standard.	Noise levels at nearest sensitive receptor would not increase beyond the 10 dBA standard.	Noise levels at nearest sensitive receptor would not increase beyond the 10 dBA standard.	No impact

Table ES-1. Comparison of Impacts by Alternative

Resource	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action Alternative
Paleontological Resources				
Potential disturbance of significant vertebrate fossils	Largest area of Project overlies unit of Potential Fossil Yield Classification (PFYC) 4, and Society of Vertebrate Paleontology (SVP) Category of High potential	Overall acreage reduced, but acreage on unit with highest potential would be same as Proposed Action	Overall acreage reduced, and acreage on unit with highest potential would be slightly reduced from that of the Proposed Action	No impact
Recreation				
Direct removal of land area for recreation	3,616 acres	2,608 acres	1,873 acres	0 acres
Displacement of open OHV routes	Requires closure of six routes or 6.8 miles	Requires closure of six routes or 6.8 miles	Requires closure of six routes or 6.5 miles	No impact
Social and Economic Issues⁴				
Construction jobs (direct, indirect, and induced)	893 jobs	893 jobs	893 jobs	0 jobs
Operations jobs (direct, indirect, and induced)	10.7 jobs	10.7 jobs	10.7 jobs	0 jobs
Sales tax revenue to Riverside County (construction)	\$864,000	\$864,000	\$864,000	\$0
Riverside County Negotiated Development Agreement	\$565,000/year	\$439,500/year	\$299,400/year	\$0
Property tax revenue to Riverside County ¹	\$14,660/year	\$20,700/year	\$20,700/year	\$0
Annual beneficial economic impact during construction	\$72.5 million	\$72.5 million	\$72.5 million	\$0
Annual beneficial economic impact during operations	\$3 million	\$3 million	\$3 million	\$0
Special Designations				
Direct impacts to ACECs, wilderness areas, and lands with wilderness characteristics	No impact	No impact	No impact	No impact

Table ES-1. Comparison of Impacts by Alternative

Resource	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action Alternative
Transportation and Traffic				
Construction impacts on local roadways (Interstate 10 and State Route 78)	No impact	No impact	No impact	No impact
Construction impacts on local intersections	Adverse impact, would not conform with Riverside County General Plan	Adverse impact, would not conform with Riverside County General Plan	Adverse impact, would not conform with Riverside County General Plan	No impact
Operations impacts on local roadways (Interstate 10 and State Route 78)	No impact	No impact	No impact	No impact
Operations impacts on local intersections	No impact	No impact	No impact	No impact
Impacts of parking demand	No impact	No impact	No impact	No impact
Utilities and Public Services				
Public services	No impact	No impact	No impact	No impact
Visual Resources				
Construction dust	Construction dust may temporarily affect the visual quality of the area	Construction dust may temporarily affect the visual quality of the area	Construction dust may temporarily affect the visual quality of the area	No impact
Nighttime construction lighting	Lights may be visible, but would be minimized to not be a nuisance or affect viewers of the night sky	Lights may be visible, but would be minimized to not be a nuisance or affect viewers of the night sky	Lights may be visible, but would be minimized to not be a nuisance or affect viewers of the night sky	No impact
Glint and glare	Glare may temporarily occur, but is unlikely to be visually distracting or a nuisance	Glare would be less likely, and less prominent, than Alternative 1 due to reduced acreage of solar arrays	Glare would be less likely, and less prominent, than Alternatives 1 and 2 due to reduced acreage of solar arrays	No impact
Visual contrast in form, line, color, and texture	Strong visual contrast at two KOPs, and moderate visual contrast at one KOP	Strong visual contrast at two KOPs, and moderate visual contrast at one KOP	Strong visual contrast at two KOPs, and moderate visual contrast at one KOP	No impact
Water Resources				
Erosion and drainage	Disturbance of drainage over 3,831 acres	Disturbance of drainage over 2,833 acres	Disturbance of drainage over 2,099 acres	Disturbance of drainage over 0 acres

Table ES-1. Comparison of Impacts by Alternative

Resource	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action Alternative
Annual groundwater consumption during construction	700 acre-feet per year (AFY) over 25 month construction period, 450 AFY over 48-month period	700 AFY over 25 month construction period, 450 AFY over 48-month period	700 AFY over 25 month construction period, 450 AFY over 48-month period	0 AFY
Annual operational water consumption	38 AFY	38 AFY	38 AFY	0 AFY
Wildland Fire				
Impacts on fire regime	Increased vehicle traffic/human presence may directly result in fire. Potential for spread of invasive weeds may increase fire risk.	Increased vehicle traffic/human presence may directly result in fire. Potential for spread of invasive weeds may increase fire risk.	Increased vehicle traffic/human presence may directly result in fire. Potential for spread of invasive weeds may increase fire risk.	No impact

Notes:

1 – Although the overall acreage of the Project is smaller under Alternatives 2 and 3 versus Alternative 1, the gen-tie line would be longer under Alternatives 2 and 3 than under Alternative 1. Some tax revenues are based on length of the gen-tie line, so are therefore higher under Alternatives 2 and 3 than under Alternative 1.

2 – See Section 4.8 for GHG calculation methodology.

3 - Under Public Land Order No. 7818, the Riverside East SEZ was withdrawn from location and entry under the United States mining laws, subject to valid existing rights, for a period of 20 years. The lands remain open to mineral and geothermal leasing, and mineral material sales.

4 – See Section 4.15 for socioeconomic calculation methodology.

5 - Abandoned channels are considered to be potentially under CDFW jurisdiction at this time. A final determination of jurisdiction will be made by CDFW through the Streambed Alteration Permit process.

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
Air Resources			
AIR-1) Conflict with or obstruct implementation of the applicable air quality attainment or maintenance plan.	All Alts. - NA	-	-
AIR-2) Violate any air quality standard or contribute substantially to an existing or projected air quality violation when added to the local background.	Alts. 1, 2, 3 – SU Alt. 4 – NI	Alts. 1, 2, 3 - AQ-1, AQ-2, TRN-4	Alts. 1, 2, 3 – SU
AIR-3) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	Alts. 1, 2, 3 – SU Alt. 4 – NI	Alts. 1, 2, 3 - AQ-1, AQ-2, TRN-4	Alts. 1, 2, 3 – SU
AIR-4) Expose sensitive receptors to substantial pollutant concentrations including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1. As defined in the MDAQMD’s CEQA Guidelines, sensitive receptors include land uses associated with residences, schools, daycare centers, playgrounds, and medical facilities. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated using CEQA Significance Criterion AIR-4: <ul style="list-style-type: none"> • Any industrial project within 1,000 feet; • A distribution center (40 or more trucks per day) within 1,000 feet; • A major transportation project (50,000 or more vehicles per day) within 1,000 feet; • A dry cleaner using perchloroethylene within 500 feet; or • A gasoline dispensing facility within 300 feet. 	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
AIR-5) Create objectionable odors affecting a substantial number of people.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
AIR-6) Expose sensitive receptors that are located within one mile of the Project site to substantial point source emissions.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
AIR-7) Involve the construction of a sensitive receptor located within one mile of an existing substantial point source emitter.	Alts. 1, 2, 3, 4 - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
Biological Resources			
BIO-1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – VEG-1, VEG-2, VEG-3, VEG-4, VEG-5, VEG-6, VEG-7, VEG-8, VEG-9, VEG-10	Alts. 1, 2, 3 – LTS
BIO-2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS.	Alts. 1, 2, 3, 4 - NI	-	-
BIO-3) Have a substantial adverse effect on Federal protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to, marshes, vernal pools, and coastal areas) or any state-protected jurisdictional areas not subject to regulation under Section 404 of the CWA through direct removal, filling, hydrological interruption, or other means. ²	Federal: Alts. 1, 2, 3,4 – NI State: Alts. 1, 2, 3 – S Alt. 4 - NI	State: Alts. 1, 2, 3 – VEG-10	State: Alts. 1, 2, 3 – LTS
BIO-4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – WIL-1, WIL-4, WIL-9, WIL-12, WIL-13	Alts. 1, 2, 3 – LTS
BIO-5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Alts. 1, 2, 3, 4 - NI	-	-
BIO-6) Conflict with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan.	All Alts. - NA	-	-
BIO-7) Substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
Cultural Resources			
CUL-1) Cause a substantial adverse change in the significance of a historical resource as defined in Code of Regulations Section 15064.5.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – CULTURAL-1 through CULTURAL-8	Alts. 1, 2, 3 – LTS
CUL-2) Cause a substantial adverse change in the significance of an archaeological resource as defined in California Code of Regulations Section 15064.5.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – CULTURAL-1 through CULTURAL-8	Alts. 1, 2, 3 – LTS
CUL-3) Disturb any human remains, including those interred outside of formal cemeteries.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – CULTURAL-3	Alts. 1, 2, 3 – LTS
TCR-1) Would the Project cause a substantial adverse change in the significance of a Tribal Cultural Resource that is listed or eligible for listing in the California Register of Historical Resources?	Alt. 1 – S Alts 2, 3, 4 - NI	Alt. 1 – CULTURAL-1, CULTURAL-6	Alt. 1 – LTS
TCR-2) Would the Project cause a substantial adverse change in a resource identified through consultation with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project?	Alts. 1, 2, 3, 4 - NI	-	-
Geology and Soils			
GEO-1) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving: a) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. b) Strong Seismic ground shaking. c) Seismic-related ground failure, including liquefaction. d) Landslides.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – GEO-1	Alts. 1, 2, 3 – LTS
GEO-2) Result in substantial soil erosion or the loss of topsoil.	Alts. 1, 2, 3 – S (wind erosion) Alt. 4 - NI	Alts. 1, 2, 3 – AQ-1	Alts. 1, 2, 3 – LTS

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
GEO-3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – GEO-1	Alts. 1, 2, 3 – LTS
GEO-4) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life and property.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – GEO-1	Alts. 1, 2, 3 – LTS
GEO-5) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – GEO-1	Alts. 1, 2, 3 – LTS
GEO-6) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard.	All Alts. - NA	-	-
GEO-7) Change topography or ground surface relief features.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
GEO-8) Create cut or fill slopes greater than 2:1 or higher than 10 feet.	All Alts. - NI	-	-
GEO-9) Result in grading that affects or negates subsurface sewage disposal systems.	All Alts. - NI	-	-
GEO-10) Change deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – WATER-1, WATER-2	Alts. 1, 2, 3 – LTS
GEO-11) Result in any increase in water erosion either on- or off-site.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – WATER-1, WATER-2	Alts. 1, 2, 3 – LTS
GEO-12) Be impacted by or result in an increase in wind erosion and blowsand, either on- or off-site.	Alts. 1, 2, 3 – S (wind erosion) Alt. 4 - NI	Alts. 1, 2, 3 – AQ-1	Alts. 1, 2, 3 – LTS
GEO-13) Be an incompatible land use located adjacent to a state classified or designated area or existing surface mine.	All Alts. - NA	-	-
GEO-14) Expose people or property to hazards from proposed, existing or abandoned quarries or mines.	All Alts. - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
Greenhouse Gas Emissions			
GHG-1) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Alts. 1, 2, 3 – LTS/B Alt. 4 - S	Alt. 4 - None	-
GHG-2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Alts. 1, 2, 3 – B Alt. 4 - S	Alt. 4 - None	-
Hazards and Hazardous Materials			
HAZ-1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – HAZ-1, HAZ-2, WATER-1	Alts. 1, 2, 3 – LTS
HAZ-2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – HAZ-1, HAZ-2, WATER-1	Alts. 1, 2, 3 – LTS
HAZ-3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	All Alts. - NI	-	-
HAZ-4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment	All Alts. - NI	-	-
HAZ-5) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would result in a safety hazard for people residing or working in the project area.	Alts. 1, 2, 3 – S (FAA) Alts. 1, 2, 3 – LTS (RCALUCP) Alt. 4 – NI (FAA and RCALUCP)	Alts. 1, 2, 3 – HAZ-3 (FAA)	Alts. 1, 2, 3 – LTS
HAZ-6) For a project within the vicinity of a private airstrip, would result in a safety hazard for people residing or working in the project area.	All Alts. - NI	-	-
HAZ-7) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	All Alts. - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
HAZ-8) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	All Alts. - NI	-	-
HAZ-9) Result in an inconsistency with an Airport Master Plan.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
HAZ-10) Require review by the Airport Land Use Commission.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
Lands, Realty, and Agricultural and Forestry Resources			
LU-1) Physically divide an established community.	All Alts. - NI	-	-
LU-2) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
LU-3) Conflict with any applicable habitat conservation plan or natural community conservation plan.	All Alts. - NA	-	-
LU-4) Result in a substantial alteration of the present or planned land use of an area.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
LU-5) Affect land use within a city sphere of influence and/or within adjacent city or county boundaries.	All Alts. - NI	-	-
LU-6) Be inconsistent with the site’s existing or proposed zoning.	All Alts. - NI	-	-
LU-7) Be incompatible with existing surrounding zoning.	All Alts. - NI	-	-
LU-8) Disrupt or divide the physical arrangement of an established community (including a low income or minority community).	All Alts. - NI	-	-
AG-1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the map prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	All Alts. - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
AG-2) Conflict with existing zoning for agricultural use, or a Williamson Act contract.	All Alts. - NI	-	-
AG-3) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).	All Alts. - NI	-	-
AG-4) Result in the loss of forest land or conversion of forest land to non-forest use.	All Alts. - NI	-	-
AG-5) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	All Alts. - NI	-	-
AG-6) Conflict with land within a Riverside County Agricultural Preserve.	All Alts. - NI	-	-
AG-7) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625, "Right-to-Farm").	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
Mineral Resources			
MR-1) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.	All Alts. - NI	-	-
MR-2) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.	All Alts. - NI	-	-
MR-3) Be an incompatible land use located adjacent to a state classified or designated area or existing surface mine.	All Alts. - NI	-	-
MR-4) Expose people or property to hazards from proposed, existing or abandoned quarries or mines.	All Alts. - NI	-	-
Noise			
NOI-1) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	All Alts. - NI	-	-
NOI-2) Substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
NOI-3) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
NOI-4) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the exposure of people residing or working in the project area to excessive noise levels.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
NOI-5) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
NOI-6) For a project within the vicinity of a private airstrip, the exposure of people residing or working in the project area to excessive noise levels.	All Alts. - NI	-	-
NOI-7) Impacts from railroad or highway noise.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
Paleontological Resources			
PALEO-1) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
Recreation and Public Access			
REC-1) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – REC-3	Alts. 1, 2, 3 – LTS
REC-2) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	All Alts. - NI	-	-
REC-3) Located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees).	All Alts. - NI	-	-
Social and Economic Effects			
SOC-1) Induce substantial population growth in an area, either directly or indirectly.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
SOC-2) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.	All Alts. - NI	-	-
SOC-3) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	All Alts. - NI	-	-
SOC-4) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
SOC-5) Affect a County Redevelopment Project Area.	All Alts. - NI	-	-
SOC-6) Cumulatively exceed official regional or local population projections.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
Transportation and Traffic			
TRA-1) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – TRN-3, TRN-4	Alts. 1, 2, 3 – LTS
TRA-2) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
TRA-3) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.	All Alts. - NI	-	-
TRA-4) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	All Alts. - NI	-	-
TRA-5) Result in inadequate emergency access.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – TRN-4	Alts. 1, 2, 3 – LTS
TRA-6) Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
TRA-7) Alter waterborne, rail or air traffic.	All Alts. - NI	-	-
TRA-8) Cause an effect, or a need for new or altered maintenance of roads.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – REC-1, TRN-4	Alts. 1, 2, 3 – LTS
TRA-9) Cause an effect upon circulation during the project’s construction.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – TRN-3, TRN-4	Alts. 1, 2, 3 – LTS
TRA-10) Affect bike trails.	All Alts. - NI	-	-
Utilities and Public Services			
USS-1) Result in substantial adverse environmental impacts associated with the provision of utility services. Substantial adverse environmental impacts may occur if the Project would: <ol style="list-style-type: none"> 1. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. 2. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. 3. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. 4. Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements. 5. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments. 6. Be served by a landfill with insufficient permitted capacity to accommodate the project’s solid waste disposal needs. 7. Fail to comply with Federal, state, and local statutes and regulations related to solid waste. 	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
PS-1) Result in substantial adverse physical impacts associated with the provision of new or physically altered facilities to provide public services.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
USS-2) Impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects. 1. Electricity 2. Natural gas 3. Communications systems 4. Stormwater drainage 5. Street lighting 6. Maintenance of public facilities, including roads 7. Other government services	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – REC-1, TRN-4	Alts. 1, 2, 3 – LTS
USS-3) Conflict with any adopted energy conservation plans.	All Alts. - NI	-	-
Visual Resources			
VIS-1) Have a substantial adverse effect on a scenic vista.	All Alts. - NI	-	-
VIS-2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
VIS-3) Substantially degrade the existing visual character or quality of the site and its surroundings.	Alts. 1, 2, 3 – SU Alt. 4 - NI	Alts. 1, 2, 3 – VIS-1, VIS-2, VIS-3, VIS-4	Alts. 1, 2, 3 – SU
VIS-4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
VIS-5) Result in the creation of an aesthetically offensive site open to public view.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
VIS-6) Interfere with nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655.	All Alts. - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
VIS-7) Expose residential property to unacceptable light levels.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
Water Resources			
HYD-1) Violate any water quality standards or waste discharge regulations.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – WATER-1, WATER-2	Alts. 1, 2, 3 – LTS
HYD-2) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – WATER-4, WATER-5	Alts. 1, 2, 3 – LTS
HYD-3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – WATER-1, WATER-2	Alts. 1, 2, 3 – LTS
HYD-4) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – WATER-1, WATER-2, WATER-3	Alts. 1, 2, 3 – LTS
HYD-5) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – WATER-1, WATER-2	Alts. 1, 2, 3 – LTS
HYD-6) Otherwise substantially degrade water quality.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – WATER-4	Alts. 1, 2, 3 – LTS
HYD-7) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.	All Alts. - NI	-	-
HYD-8) Place within a 100-year flood hazard area structures which would impede or redirect flood flows.	All Alts. - NI	-	-
HYD-9) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	All Alts. - NI	-	-

Table ES-2. Summary of Impact Significance under CEQA

Potential Impact	CEQA Significance Before Mitigation ¹	Mitigation	CEQA Significance After Mitigation
HYD-10) Be at risk of inundation by seiche, tsunami, or mudflow.	All Alts. - NI	-	-
HYD-11) Include new or retrofitted Stormwater Treatment Control BMPs (e.g., water quality treatment basins, constructed treatment wetlands), the operation of which could result in significant environmental effects (i.e., increased vectors and/or odors).	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
HYD-12) Cause changes in absorption rates or the rate and amount of surface runoff.	Alts. 1, 2, 3 – S Alt. 4 - NI	Alts. 1, 2, 3 – WATER-1, WATER-2	Alts. 1, 2, 3 – LTS
HYD-13) Cause changes in the amount of surface water in any water body.	Alts. 1, 2, 3 – LTS Alt. 4 - NI	-	-
Wildland Fire			
Fire-1) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	All Alts. - NI	-	-

1 - SU – Significant and unavoidable

LTS – Less than significant

S – Significant

NI – No impact

B – Beneficial

NA – Not applicable

2 - Abandoned channels are considered to be potentially under CDFW jurisdiction at this time. A final determination of jurisdiction will be made by CDFW through the Streambed Alteration Permit process.

CHAPTER 1 INTRODUCTION AND PURPOSE AND NEED

1.1 Introduction

The Regional Context of the Project is shown in Figure 1-1 (see Appendix A for all figures referenced in the Final PA/EIS/EIR); the Project Location, Proposed Site Layout, and Solar Unit Detail are shown in Figures 2-1, 2-2, and 2-3.

The Final PA/EIS/EIR evaluates the potential effects of the Proposed Action and two other alternatives on BLM-administered lands and privately-owned lands under the County's jurisdiction. A number of other alternatives to the Proposed Action were developed and evaluated by the BLM but ultimately not carried forward for detailed analysis (see Section 2.9 for further information). These include alternative sites, other solar and renewable technologies, generation technologies using different fuels, and conservation and demand-side management. Of the alternatives considered, four alternatives were determined by the BLM to warrant detailed analysis: Alternative 1, the Proposed Action that would generate up to 450 megawatts (MW); Alternative 2, a Resource Avoidance Alternative that would generate up to 450 MW; Alternative 3, a Reduced Project Alternative that would generate up to 285 MW; and Alternative 4, the No Action Alternative.

Acronyms used in this document are defined in Appendix B, which also includes a glossary of various terms used in this document. The references used in this document are listed in Appendix C.

1.2 Joint NEPA/CEQA Document

This Final PA/EIS/EIR was prepared as a joint Federal/state environmental document (State Clearinghouse Number 2015031066 and EIS Number DOI-BLM-CA-D060-2017-0002). This document analyzes the effects of the proposed Project solar facility site and gen-tie line corridor, and Alternatives.

1.2.1 NEPA Environmental Impact Statement

The National Environmental Policy Act (NEPA) requires the preparation of an EIS for all "major Federal actions significantly affecting the quality of the human environment" 42 U.S.C. §4332(2)(C). The ROW grant for the proposed solar facility and associated gen-tie line would be located on BLM-managed lands and triggers the need for environmental review with BLM as the NEPA lead agency. In accordance with NEPA (42 U.S.C. § 4321 et seq.); Council on Environmental Quality's (CEQ) NEPA regulations (40 Code of Federal Regulations (CFR) §1502.13); the DOI's NEPA regulations, 43 CFR Part 46; the BLM NEPA Handbook, H-1790-1; FLPMA Sections 201, 202, and 206, (43 U.S.C. §§ 1711, 1712, 1716; 43 CFR Part 1600); and the BLM Land Use Planning Handbook, H-1601-1, this joint Final PA/EIS/EIR (1) describes the affected environment relevant to potential impacts of the proposed action, action alternatives, and no action alternative; (2) evaluates the environmental impacts that are expected to result from construction, operation, maintenance, and decommissioning of the proposed solar facility and its alternatives in the BLM ROW; and (4) identifies and characterizes cumulative impacts that could

result from the proposed action (and its action alternatives) in relation to other ongoing or reasonably foreseeable activities within the surrounding area. Additionally, this Final PA/EIS/EIR presents recommended mitigation measures that, if adopted, would avoid, minimize, or otherwise mitigate for certain direct and indirect environmental impacts identified. The information contained in this Final PA/EIS/EIR will be considered by the BLM in its deliberations regarding approval of the ROW grant, and may also be considered by other Federal agencies for use in decision-making to protect, preserve, and enhance the human environment and natural ecosystems.

1.2.2 CEQA Environmental Impact Report

Under the California Environmental Quality Act (CEQA), as amended (Public Resources Code Section 21080(a)), an environmental review document must be prepared, reviewed, and certified by the decision-making body before action is taken on any non-exempt discretionary project proposed to be carried out or approved by a state or local public agency in California. This Final PA/EIS/EIR serves as the environmental review document that evaluates the potential environmental effects associated with implementation of the proposed Project. This Final PA/EIS/EIR has been prepared pursuant to CEQA (California Public Resources Code Section 21000 et seq.) and the state CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.).

The Final PA/EIS/EIR will serve as an informational disclosure document for the County, responsible agencies, and other interested parties. The County will consider the conclusions of the Final PA/EIS/EIR, in light of the entire administrative record, before certifying the Final PA/EIS/EIR and taking action on the Project. The following are included among the stated purposes of an EIR in the state CEQA Guidelines:

- Disclose significant environmental impacts that are expected to result from the construction, operation, and maintenance of the proposed Project;
- Indicate ways in which significant impacts can be avoided or otherwise mitigated;
- Identify any unavoidable adverse impacts that cannot be mitigated; and
- Identify feasible alternatives to the Project that would substantially lessen or eliminate significant adverse impacts.

1.3 Purpose and Need

1.3.1 BLM Purpose and Need

NEPA guidance published by the Council on Environmental Quality (CEQ) states that an Environmental Impact Statement's Purpose and Need section "shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action" (40 Code of Federal Regulations (CFR) §1502.13). It describes the BLM's purpose and need for action, which is informed by but distinct from the Applicant's interests and objectives.

The BLM's purpose and need for the Project is to respond to the Applicant's application under Title V of the Federal Land Policy and Management Act of 1976 (FLPMA) (43 USC §1761(a)(4)) for a ROW grant to construct, operate, maintain, and decommission a solar photovoltaic (PV) facility on public lands in compliance with FLPMA, BLM ROW regulations, and other applicable

Federal laws, policies and plans. In accordance with §302(a) of FLPMA, public lands are to be managed for sustained yield and multiple uses that take into account the long-term needs of future generations for renewable and non-renewable resources. The Secretary of the Interior is authorized to grant rights-of-way on public lands for systems of generation, transmission, and distribution of electric energy (43 USC §1761(a)(4)). Taking into account BLM's sustained yield and multiple use mandates, the BLM will decide whether to approve, approve with modification(s), or deny issuance of a ROW grant to the Applicant for the proposed Project.

The Proposed Action, if approved, also would assist the BLM in addressing several management and policy objectives advanced through the following authorities and policies applicable to the BLM:

1. Executive Order 13783 (March 28, 2017) and Secretary's Order 3349 (March 29, 2017) establishes policy to promote clean and safe development of the energy resources within the United States.
2. Executive Order 13807 (August 15, 2017) and Secretary's Order 3355 (August 31, 2017) established policy to prioritize infrastructure projects and streamline the environmental review process.
3. Section 211 of the Energy Policy Act of 2005 established a goal for the Department of the Interior to approve non-hydropower renewable energy projects on the public lands with at least 10,000 MWs of capacity by 2015. To achieve and exceed this goal, the BLM has now authorized over 17,000 MWs of non-hydropower renewable energy projects. The BLM continues to prioritize renewable energy development on public lands.
4. Desert Quartzite is a covered project under Title 41 of Fixing America's Surface Transportation Act (FAST-41). FAST-41 established new coordination and oversight procedures for infrastructure projects being reviewed by Federal agencies. The intent of the act is to improve early coordination between government agencies, increase public transparency, and increase government accountability.

1.3.2 County and Applicant's Project Objectives

The purpose of the project is to construct and operate a solar energy facility using a low-profile, PV solar technology that maximizes the generation of a renewable and reliable source of electrical power consistent with Federal and state policies and plans designed to promote environmentally responsible development of affordable renewable energy projects and green jobs in California. In furtherance of this purpose, the County and Project Applicant have set forth the following basic objectives for the proposed Project:

- To generate up to 450 MW of electricity using PV solar technology and sell that power at the most competitive, low-cost price.
- To locate the Project in a manner that maximizes operational efficiencies, furthers the objectives of landscape-level smart-siting planning efforts, avoids Desert Wildlife Management Areas, Areas of Critical Environmental Concern and National Conservation Lands where feasible, and minimizes water use, new linear developments, and environmental impacts in general.

- To minimize environmental impacts and land disturbance by, among other things, siting the facility on relatively flat, contiguous lands with high solar insolation, in close proximity to established utility corridors, existing transmission lines with available capacity to facilitate interconnection, and accessible roads.
- To assist, to the greatest extent possible, with achieving state greenhouse gas (GHG) reduction objectives, including the requirements under SB X1-2 to increase the state's Renewable Portfolio Standard (RPS) to 33 percent by 2020 and under SB 350 to increase the state's RPS to 50 percent by 2030.
- To further the purpose of Secretarial Order 3285A1, establishing the development of environmentally responsible renewable energy as a priority for the Department of the Interior.
- To increase local short-term and long-term employment opportunities.
- To provide economic benefits to Riverside County, in accordance with Policy B-29 and the motivations for its adoption, by stimulating spending at local businesses, increasing tax revenues, and generating development fees.

State of California Renewable Energy Standards and Goals

The State of California's RPS originally required California's investor-owned electric utilities to obtain 20 percent of the electricity that they supply from renewable sources by 2010. Executive Order S-14-08 expanded this goal, mandating that "all retail sellers of electricity shall serve 33 percent of their load with renewable energy by 2020." State government agencies were furthermore directed to take all appropriate actions to implement this target in all regulatory proceedings, including siting, permitting, and procurement for renewable energy power plants and transmission lines.

California's three large investor-owned utilities (Pacific Gas and Electric, San Diego Gas and Electric, and Southern California Edison) made quick progress toward meeting these goals, and by 2016, they collectively served 34.8 percent of their retail electricity sales with renewable power (CPUC 2017). In 2015, the Legislature and Governor accordingly raised the bar for renewable energy by mandating a 50% RPS by 2030 in SB 350.

State of California policy has mandated significant increases in renewable energy generation, including utility-scale solar facilities like the proposed Project, and requires that California utilities meet their electrical supply needs from both large central station power sources, and from distributed generation. "Utility scale power plants can take advantage of economies of scale early in the growth of new technologies. As of November, 2017, California has approximately 17,210 MW of CEC-installed utility-scale renewable energy capacity (CEC 2017).

State of California Greenhouse Gas Reduction

The State of California is committed to a significant and substantial increase in reliance on renewable resources for electrical power, the reduction of fossil-fuel based pollutants, and promoting the green economy, consistent with protection of the environment. The RPS embodies this commitment, but it is evident in other statutes and policies as well, in particular those policies

that aim to reduce California’s contribution of approximately 6.2 percent of the total United States GHG.

Former Governor Arnold Schwarzenegger issued Executive Order S-03-05 on climate change to advance renewable energy and to reduce California’s GHG emissions. Further, in enacting the California Global Warming Solutions Act of 2006 (Assembly Bill 32), the Legislature found that global warming poses a serious threat to California’s economic well-being, public health, natural resources, and environment. Aspiring to exercise a global leadership role, Assembly Bill 32 directed the California Air Resources Board (CARB) to develop regulations, market mechanisms, and other actions to reduce California’s greenhouse gas emissions, such as carbon dioxide, to 1990 levels by 2020 (see Health and Safety Code, § 38501).

In fulfilling its duties under Assembly Bill 32, CARB determined that electricity generation accounts for approximately 22 percent of carbon dioxide (CO₂) emissions in California due to the burning of fossil fuel energy sources such as coal and natural gas. Renewable energy power plants are urgently needed to address the emissions and enable the state to meet its GHG reduction objectives and RPS standard. The Project is anticipated to produce approximately 2.25 billion kilowatt hours (kWh) of electrical energy per year (URS 2015). The total annualized GHG emissions of the Project are approximately 1,317 metric tons (MT) CO₂ equivalent (CO₂e) per year, including 706 MT of amortized construction emissions, 278 MT CO₂e of corresponding operational emissions, and an estimated 332 MT CO₂e of annualized decommissioning emissions. In comparison, gas turbine and coal-fired power plants of the same electrical energy output are estimated to produce approximately 787,500 and 2,250,000 metric tons of CO₂e, respectively. The net GHG emission displacement or offset of the Project’s solar facility in place of a conventional fossil-fuel combustion power plant is estimated to range from 786,220 to 2,248,720 MT CO₂e per year.

Proximity to Electrical Transmission Facilities

A major impediment to meeting the RPS is transmission line capacity and availability. California Independent System Operator (CAISO) manages the high-voltage transmission system and controls the process of obtaining rights to interconnect to the statewide grid. To obtain permission to interconnect with transmission facilities, an electric generator must submit an interconnection application to CAISO, which then places the electric generator into the “interconnection queue” and evaluates and apportions the cost of any associated transmission facility upgrades. Accordingly, a key driver in achieving the state’s RPS is to locate renewable energy power plants where transmission capacity is expected to be available and sufficient queue position has been reserved by the electric generator, such that interconnection approvals can be granted within the near term.

The Project would be located approximately 3.0 miles from Southern California Edison’s Colorado River Substation (CRSS), a component of the Devers-Palo Verde 2 (DPV2) Transmission Line project, which received its approval from the California Public Utilities Commission (CPUC) in July 2011 (Decision D.11-07-011) and was completed in September, 2013. A portion of the proposed 230 kV gen-tie line that is outside of the solar facility but part of the Project would be collocated in a utility corridor with gen-tie lines from other local solar power facilities.

High Potential Solar Resource Area

The Project site receives anywhere between 6.0 and 7.0 kWh per square meter per day (kWh/m²/day) of solar radiation energy, giving it a higher degree of solar radiation than most areas within the United States (NREL 2012). The BLM and Department of Energy prepared a Solar Energy Development Programmatic Environmental Impact Statement (PEIS; also known as the Western Solar Plan) that identified the Riverside East Solar Energy Zone (SEZ), of which the Project site is a part, as having a high potential for solar resources (BLM and DOE 2012). Also, there are a number of proposed and approved solar projects that have been constructed in close proximity to the Project site (refer to the Cumulative Project Map found in Chapter 4.1). As such, the Project would be sited in an area with excellent solar energy resources in order to maximize productivity from the PV panels.

Proven and Available Solar PV Technology

The Project would use proven and available PV solar modules, mounted on either single-axis horizontal tracker structures or fixed-tilt mounting systems, which provide efficient solar energy at a cost-effective utility scale. Solar PV technology has been commercially used for over 40 years. According to the U.S. Solar Market Insight Report, 6,234 MW of utility-scale photovoltaic solar systems were installed in the United States in 2017. The cumulative contracted PV capacity operating in the country now stands at 18,100 MW (SEIA 2018).

1.4 Project Location and Overview

The Applicant proposes to construct, operate, maintain, and decommission a solar PV electric generating facility with a capacity of 450 MW. The DQSP would be located in the southern California inland desert, approximately 2.75 miles southwest of the City of Blythe, just south of the Interstate 10 (I-10) freeway, and 1.5 miles southwest of Blythe Airport in Riverside County, California (Figure 2-1).

As reflected in the ROW grant application filed with the BLM, and subsequently serialized as application # CACA-049397 for BLM record tracking, the DQSP would be located primarily on BLM-administered land, within Sections 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 22, 23, and 24 of Township 7S, Range 21E, San Bernardino Base and Meridian. The Applicant is seeking a ROW grant for approximately 3,616 acres. Within the proposed Project area, construction and operation would disturb approximately 3,560 acres of BLM land for the solar plant site and other Project-related facilities, 54 acres of BLM land for a 2.79 mile gen-tie corridor with a width of 160 feet, and 2 acres for the offsite portion of a buried telecommunications line and possible above-ground electrical service line on BLM land. The DQSP also would disturb approximately 154 acres of private lands that are under County jurisdiction, and are adjacent to the BLM ROW grant boundary. The Project does not include any County real property or County right-of-way.

1.5 Major Authorizing Laws and Regulations/Agency Roles and Authorizations

The primary agency-specific authorizing laws, regulations, and policies governing the Lead Agencies' decisions are summarized below. Other relevant resource- and issue-specific laws, regulations, plans, and policies are summarized in Appendix D.

1.5.1 BLM

BLM's authority and policy guidance for making a decision related to the Proposed Action is derived from FLPMA (43 USC §1701 et. seq.), EAct § 211 (119 Stat. 594, 600). FLPMA authorizes the BLM to issue ROW grants for systems for generation, transmission, and distribution of electric energy. The BLM's policies and procedures for authorizing individual solar energy projects are found in the BLM's regulations at 43 CFR 2800.

The BLM will decide whether to deny the proposed ROW, grant the ROW, or grant the ROW with modifications. The BLM may include any terms, conditions, and stipulations it determines to be in the public interest, which may include modifying the proposed use or changing the route or location of the proposed facilities (43 CFR Part 2805.10(b)(1)).

The Western Solar Plan recognizes the DQSP as a "pending" ROW application (Western Solar Plan §9.4.22.2, p. 9.4-133). Pending applications like the DQSP are not subject to the land use planning decisions in the Western Solar Plan (Western Solar Plan ROD Section B.1.2) or to the CDCA Plan amendments made in that decision. Therefore, if the BLM elects to approve the ROW grant application for the DQSP, a Project-specific PA would be required. The decision to be made by the BLM regarding the ROW grant for the gen-tie line corridor will also require a PA, because a portion of that proposed facility lies outside of a designated utility corridor. This Final PA/EIS/EIR acts as the mechanism for complying with the NEPA and plan amendment requirements of the CDCA Plan relevant to the Proposed Action.

1.5.2 Riverside County

Implementation of the portions of the proposed Project that would be located on privately-owned lands would require discretionary approvals from Riverside County, including a Conditional Use Permit (CUP) and Public Use Permit (PUP). In addition to the Conditional Use Permit, the Applicant would be required to enter into a Development Agreement with the County for the DQSP consistent with the County's solar power plant program. The Development Agreement has a term of 30 years and will grant the Applicant vesting rights to develop the Project in accordance with the terms of the agreement. The Development Agreement contains terms consistent with Board of Supervisors Policy No. B-29, including terms regarding annual public benefits payments and increases and terms requiring the applicant to take actions to ensure allocation directly to the County of the sales and use taxes payable in connection with the construction of the solar power plant, to the maximum extent possible under the law. Approval and use of the Conditional Use Permit are conditioned upon the Development Agreement being entered into and effective.

This Final PA/EIS/EIR will be used by the County, in conjunction with other information developed in the County's formal administrative record for the Project, when considering whether to approve the CUP, PUP, and Development Agreement for the construction, operation, maintenance, and decommissioning of the proposed Project on lands subject to County jurisdiction. Pursuant to CEQA requirements, the County will determine the adequacy of the Final EIR and, if determined adequate, will certify the document as complying with CEQA.

1.5.3 U.S. Fish and Wildlife Service

The United States Fish and Wildlife Service (USFWS) has jurisdiction over threatened and endangered species listed under the Federal Endangered Species Act (FESA) (16 USC § 1531 et

seq.). Formal consultation with the USFWS under Section 7 of the FESA is required for any Federal action that may adversely affect a Federally listed species. This consultation was through the preparation and submittal of a Biological Assessment (BA) on October 25, 2018. On April 12, 2019, the USFWS issued a Biological Opinion (BO), included in Appendix M, that specifies reasonable and prudent measures that must be implemented to minimize the impacts of incidental take of any protected species that is anticipated to result from implementing the Project.

1.5.4 U.S. Army Corps of Engineers

The United States Army Corps of Engineers (USACE) has jurisdiction to protect the waters of the United States, including protection of water quality and wetland resources, under §404 of the Clean Water Act (CWA). Under that authority, USACE regulates the discharge of dredged or fill material into waters of the United States, including wetlands, by reviewing proposed projects to determine whether they may impact such resources and, thereby, are subject to retain a §404 permit. On May 8, 2015, the Applicant submitted a request to the Los Angeles District of the USACE for an approved Department of the Army Jurisdictional Determination (JD) for the Project site. Additional field data in support of the request were submitted to the USACE in October, 2015. In a letter dated February 18, 2016, the USACE determined that waters of the United States do not occur on the Project site. The letter is attached to the Federal Jurisdictional Delineation provided in Appendix I.

1.5.5 California Department of Fish and Wildlife

The California Department of Fish and Wildlife (CDFW) protects fish and aquatic habitats within the state through regulation of modifications to stream and lakebeds, under §1602 of the California Fish and Game Code. CDFW has interpreted the term “streambed” to encompass all portions of the bed, banks, and channel of any stream, including intermittent and ephemeral streams, extending laterally to the upland edge of riparian vegetation. In the case of vegetated ephemeral dry washes, such as those present on the Project site, this CDFW interpretation often results in an asserted geographic jurisdictional area that is much wider than the active channel of the stream and, therefore, much wider than the jurisdiction of the USACE. Section 1602(a) states that it is unlawful for an entity to “substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake” without first notifying CDFW of that activity. If CDFW determines that the activity may substantially adversely affect an existing fish or wildlife resource, the entity will need to obtain a Lake or Streambed Alteration Agreement from the CDFW before it may commence the activity (Fish & Game Code §1602(a)(4)(B)). CDFW would include in the Lake or Streambed Alteration Agreement measures necessary to protect the affected resources. The requirements of a Streambed Alteration Agreement would apply to the Project independent of and in addition to mitigation measures included in the PA/EIS/EIR.

CDFW also has the authority to regulate potential impacts to species that are protected under the California Endangered Species Act (CESA) (Fish and Game Code §2050, et seq.). If appropriate, the Applicant would be required to file an Incidental Take Permit application, and the requirements of the Incidental Take Permit would apply to the Project independent of and in addition to the mitigation measures included in the PA/EIS/EIR.

Under the provisions of the California Desert Native Plants Act, CDFW is charged with oversight of harvesting certain species of California desert native plants on both public and privately owned lands in the counties of Imperial, Inyo, Kern, Los Angeles, Mono, Riverside, San Bernardino, and San Diego. Removal of specific plants species requires a valid permit and any required tags or seals obtained from the respective county Sheriff’s Office or Commissioner’s Office where collection occurs. Plants found in the Project area that fall under the California Desert Native Plants Act are listed in Section 3.3.

1.6 Policy Consistency and Land Use Conformance

1.6.1 Relationship of the Proposed Action to the Western Solar Plan

In order to address interest in solar energy development and to implement a national energy policy recommendation to increase renewable energy production, in 2012 BLM and the U.S. Department of Energy (DOE) undertook efforts to comprehensively evaluate solar energy potential on public lands. In July 2012, BLM and DOE published the Final Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States (Western Solar Plan). The Western Solar Plan analyzed two alternative plans for managing solar energy development on BLM-administered public lands in the six-state study area. One of these plans, called the Western Solar Plan, was adopted through the Approved Resource Management Plan Amendments/ROD for Solar Energy Development in Six Southwestern States in October 2012.

The Western Solar Plan made amendments to 89 BLM land use plans, including the CDCA Plan, not only to support solar energy development on public lands, but also to minimize potential environmental, cultural, and socioeconomic impacts. As part of the Western Solar Plan, the BLM identified priority development areas called Solar Energy Zones (SEZs) that are well suited for utility-scale production of solar energy, “variance” areas outside of SEZs where solar development would be open to applications, and “exclusion” areas where utility-scale solar energy development would not be permitted. The Project is located within the Riverside East SEZ.

The Western Solar Plan states that “pending” applications filed within SEZs prior to June 30, 2009 are not subject to the land use planning decisions in the Western Solar Plan. Amendments to pending applications are also not subject to the Plan’s new requirements, provided that such amendments either (1) do not change the boundaries of the pending ROW applications; or (2) are related to avoiding resource or land use conflicts, adapting the project to third-party-owned infrastructure constraints, or using or designating translocation or mitigation lands (Section B.12, Western Solar Plan ROD). Instead, “pending” applications and qualifying amendments (that is, revisions to applications) must be processed consistently with the land use plan decisions that existed prior to the adoption of the Western Solar Plan ROD.

The Desert Quartzite Solar Project’s initial application for a right-of-way grant (ROW) was submitted to BLM on September 28, 2007. Therefore, the Project qualifies as a “pending” application which is exempt from the Western Solar Plan ROD, and is instead subject to the land use plan decisions that preceded the Western Solar Plan. The Desert Quartzite Solar PV proposal is an amendment to this pending application. As explained below, to the extent that the Desert Quartzite PV proposal “change[s] the boundaries of the pending ROW application” those changes are related either to “avoiding resource or land use conflicts” or to “adapting the project to third-party-owned infrastructure constraints.” Thus, Desert Quartzite Solar PV Project is exempt from

the requirements of the Western Solar Plan ROD. The Desert Quartzite Solar PV proposal is therefore being processed under the CDCA land use plan decisions that were in place prior to the adoption of the Western Solar Plan.

The qualifications for the exemption provided in ROD Section B.1.2 focus on amendments to an application that affect the boundaries of the ROW. Therefore, amendments which do not relate to boundary changes are not relevant to the exemption inquiry. For instance, the change in footprint boundaries to avoid or reduce impacts under the DQSP proposal do not affect whether the Project is exempt from the Western Solar Plan ROD.

1.6.2 Relationship of the Proposed Action to the Desert Renewable Energy Conservation Plan

In November 2008, pursuant to an executive order by the Governor of California, Federal and California state agencies formed the Renewable Energy Action Team (REAT) to, among other things, develop the DRECP. As ultimately approved, the purpose of the DRECP is to conserve and manage plant and wildlife communities on BLM-administered Federal lands in the desert regions of California while streamlining the approval of compatible renewable energy projects. BLM published its ROD and Land Use Plan Amendment (LUPA) to the California Desert Conservation Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan in September 2016.

Of the approximately 10 million acres of BLM-managed public lands in the Mojave and Colorado desert regions of California, the DRECP LUPA allocated approximately 388,000 acres as Development Focus Areas (DFAs) for solar, wind, and geothermal projects, similar to the SEZs under the Western Solar Plan. It also allocated variance lands where renewable energy may be developed depending on further review. The DRECP LUPA also allocated lands for conservation and recreation, and determined that those allocations were not compatible with renewable energy development. Finally, renewable energy may be considered on general public lands, which are lands not allocated for specific values or uses. The Project is located within a DFA.

Pursuant to Section II.3.2.4 of the DRECP LUPA, the DRECP does not apply to “[a] project that is proposed in a BLM SEZ and that is considered a ‘pending project’ under the Western Solar Plan (the project application was filed before June 30, 2009).” As discussed above, the initial project application was filed before June 30, 2009, the Project is located within a SEZ, and the amendments contemplated by the Desert Quartzite Solar PV proposal either do not affect the project boundaries (e.g., change in project developer) or are related to avoiding resource or land use conflicts or adapting the Project to third-party-owned infrastructure constraints. DQSP is furthermore called out, by name, as a pending project on 4,845 acres in the DRECP (see DRECP Proposed LUPA and Final EIS (Oct. 2015), at Page IV.25-7). DQSP is also accounted for as an approved project on 7,236 acres on Page IV.25-6. Therefore, the Desert Quartzite Solar PV proposal is being processed under the CDCA land use plan decisions in place prior to the adoption of the DRECP LUPA and Western Solar Plan.

Although this application is being processed under the CDCA Plan in place prior to the DRECP LUPA and Western Solar Plan, the BLM has considered information developed through the DRECP LUPA process in this EIS, as reflected in the affected environment and environmental consequences sections. Additionally, Alternative 3 (Reduced Project Alternative) considers

application of some mitigation and avoidance measures developed through the DRECP LUPA (called Conservation and Management Actions [CMAs] in the DRECP LUPA).

To assist the reader in understanding how the Project was analyzed under a prior land use plan after a new plan had been developed, a discussion of the differences between the CDCA Plan and the DRECP land use allocations, and their effect on the analysis of the Project in this PA/EIS/EIR, is presented in Appendix E. In some instances, the Proposed Project and/or its alternatives substantially conform with the CMAs identified in the DRECP for the development of renewable energy in DFAs. In other instances, BLM looked to select CMAs for guidance on mitigating or avoiding certain impacts.

1.6.3 Northern and Eastern Colorado Desert Coordinated Management Plan

The BLM's Northern and Eastern Colorado (NECO) Plan (BLM 2002a) amended the CDCA Plan in 2002 to make it compatible with desert tortoise conservation and recovery efforts. The NECO Plan is a landscape-scale planning effort that covers most of the California portion of the Sonoran Desert ecosystem, including over 5 million acres and two Mojave desert tortoise recovery units. The NECO Plan established conservation areas and proscribed management actions in the region that includes the Project area.

1.6.4 Land Use Plan Conformance

The CDCA Plan area encompasses 25 million acres in southern California designated by Congress in 1976 through FLPMA. The CDCA Plan is a comprehensive, long-range plan that was adopted in 1980; it has since been amended many times. The CDCA is a 25-million-acre area that contains over 12 million acres of BLM-administered public lands in the California Desert, which includes the Mojave Desert, the Sonoran Desert, and a small part of the Great Basin Desert. The CDCA Plan provides regional guidance for BLM-administered lands within the Plan Area and establishes long-term goals for protection and use of the California desert. It is based on the concepts of multiple use, sustained yield, and maintenance of environmental quality. The CDCA Plan establishes multiple use classes, multiple use class guidelines, and plan elements for specific resources or activities, such as motorized vehicle access, recreation, and vegetation. While the DRECP has eliminated the multiple use classes, the Proposed Action is analyzed under the classes because it is not subject to land use planning decisions in the DRECP.

The Desert Quartzite Solar site is classified in the CDCA Plan as Multiple-Use Class (MUC) M (Moderate Use). The Desert Quartzite Solar site currently is not identified in the CDCA Plan for use as a solar power facility. To accommodate the DQSP or any of the action alternatives, the CDCA Plan must be amended to identify the use of the site as a solar power facility. As noted above, both the Western Solar Plan and the DRECP have defined the Desert Quartzite Solar site as being appropriate for solar development. However, because the DQSP is not subject to those plan amendments, it requires a project-specific PA. Compliance of the Project with the multiple use class designations is discussed in the lands and realty section of the PA/EIS/EIR (Section 4.10, and in Appendix F).

Based on CDCA Plan Table 1, Multiple Use Class Guidelines, and CDCA Plan Chapter 3, Energy Production and Utility Corridors Element, solar uses are conditionally allowed in the Multiple Use Class M designation contingent on NEPA requirements being met for the proposed use. Table 1, Item 7 (Transmission Facilities) of the CDCA Plan specifies that new electric transmission

facilities are allowed only within designated corridors. A portion of the proposed gen-tie line would be located outside of a designated corridor. Therefore, a PA is required to authorize this portion of the gen-tie line. This Final PA/EIS/EIR will act as the mechanism for complying with the NEPA and plan amendment requirements of the CDCA Plan relevant to the Proposed Action.

As stated on Page 70 of the NECO Plan, “Route designations approved through the NECO Plan constitute CDCA Plan decisions; future changes to these decisions would require amending the CDCA Plan”. Because the Project would require closure of 6.8 miles of routes that currently exist within the project area, a PA is required to authorize the closure. This Final PA/EIS/EIR will act as the mechanism for complying with the NEPA and plan amendment requirements of the CDCA Plan relevant to the Proposed Action.

Planning Criteria (BLM)

The CDCA Plan planning criteria are the constraints and ground rules that guide and direct the development of the PA. They ensure that the PA is tailored to the identified issues and ensure that unnecessary data collection and analyses are avoided. They focus on the decisions to be made in the PA regarding authorization of the solar facility, the portion of the gen-tie line outside of the solar facility boundary and a designated utility corridor, and closure of routes.

As specified in Chapter 7 of the CDCA Plan, “Plan Amendment Process”, there are three categories of plan amendments:

- Category 1, for proposed changes that will not result in significant environmental impact or analysis through an Environmental Impact Statement;
- Category 2, for proposed changes that would require a significant change in the location or extent of a multiple-use class designation; and
- Category 3, to accommodate a request for a specific use or activity that will require analysis beyond the plan amendment decision.

Based on these criteria, approval of the location for the proposed solar facility, of the gen-tie line outside of the main facility and designated corridor, and the closure of 6.8 miles of routes would each require a Category 3 amendment. The section below summarizes the procedures necessary to evaluate the proposed PAs, as well as the procedures required to perform the environmental review of the ROW application for both.

Plan Amendment Process

The plan amendment process is outlined in Chapter 7 of the CDCA Plan. In analyzing an applicant’s request for amending or changing the CDCA Plan, the BLM District Manager will:

1. Determine if the request has been properly submitted and if any law or regulation prohibits granting the requested amendment.
2. Determine if alternative locations within the CDCA are available which would meet the applicant’s needs without requiring a change in the Plan’s classification, or an amendment to any Plan element.
3. Determine the environmental effects of granting and/or implementing the applicant’s request.

4. Consider the economic and social impacts of granting and/or implementing the applicant's request.
5. Provide opportunities for and consideration of public comment on the proposed amendment, including input from the public and from Federal, state, and local government agencies.
6. Evaluate the effect of the proposed amendment on BLM management's desert-wide obligation to achieve and maintain a balance between resource use and resource protection.

Decision Criteria for Evaluation of Proposed Plan Amendment

The Decision Criteria to be used for approval or disapproval of the proposed amendment require that the following determinations be made by the BLM Desert District Manager:

1. The proposed amendment is in accordance with applicable laws and regulations; and
2. The proposed amendment will provide for the immediate and future management, use, development, and protection of the public lands within the CDCA.

The BLM Desert District Manager will base the rationale for these determinations on the principles of multiple use, sustained yield, and maintenance of environmental quality as required in FLPMA.

Decision Criteria for Evaluation of Application

In addition to defining the required analyses and Decision Criteria for plan amendments, the CDCA Plan also defines the Decision Criteria to be used to evaluate future applications in the Energy Production and Utility Corridors Element of Chapter 3. These Decision Criteria include:

1. Minimize the number of separate rights-of-way by utilizing existing rights-of-way as a basis for planning corridors;
2. Encourage joint-use of corridors for transmission lines, canals, pipelines, and cables;
3. Provide alternative corridors to be considered during processing of applications;
4. Avoid sensitive resources wherever possible;
5. Conform to local plans whenever possible;
6. Consider wilderness values and be consistent with final wilderness recommendations;
7. Complete the delivery systems network;
8. Consider ongoing projects for which decisions have been made; and
9. Consider corridor networks which take into account power needs and alternative fuel resources.

The BLM will include a statement in the Record of Decision evaluating these criteria based on the information contained in this PA/EIS and on comments received during the public comment period on the Final PA/EIS/EIR.

1.7 Document Organization

This is a joint Final PA/EIS/EIR document prepared in compliance with both NEPA and CEQA. The document is longer and more complex than would be typical if the document were an EIS or EIR only.

This document follows regulations promulgated by the CEQ for Implementing the Procedural Provisions of NEPA (40 CFR §§1500-1508); the DOI's NEPA regulations, 43 CFR Part 46; the BLM NEPA Handbook, H-1790-1; FLPMA §§201, 202, and 206 (43 CFR §1600); the BLM Land Use Planning Handbook, H1601-1; and DOE's NEPA implementing procedures (10 CFR §1021). This PA/EIS/EIR describes the components of and reasonable alternatives to the Proposed Action, environmental consequences of the Proposed Action and other alternatives, and the agencies and persons consulted during preparation of the PA/EIS/EIR. Table 1-1 identifies each NEPA element with a reference to the corresponding section(s) in the Final PA/EIS/EIR where the elements are discussed. The format and content of this Final PA/EIS/EIR are consistent with the BLM NEPA Handbook (H-1790-1) as listed in Table 1-1.

The state CEQA Guidelines provide that each EIR contain essential elements of discussion. Table 1-1 identifies each CEQA element that must be described in an EIR along with a reference to the corresponding section(s) in the Final PA/EIS/EIR where the elements are discussed.

The PA/EIS/EIR is organized as follows:

Executive Summary provides the reader an opportunity to understand the entire Project and its implications. The Executive Summary includes: a brief description of the Project Applicant; lead agency and responsible agency data; a narrative summary of each impact, with proposed mitigation measures and alternatives that would reduce those impacts; areas of interest known to the lead agencies; and issues to be resolved including the choice among alternatives and whether or how to mitigate the impacts.

Chapter 1 provides general background on the Proposed Action (CEQA Project Description); describes the purpose of NEPA, CEQA and the Final PA/EIS/EIR; identifies the purpose and need for the Proposed Action, and Project objectives; and identifies roles of the BLM, the County, and other agencies and authorities regulating various aspects of the Proposed Action. Chapter 1 also describes the format and content of the Final PA/EIS/EIR; permits and other discretionary actions required for the Project; related review and consultation requirements; and contact persons for the Final PA/EIS/EIR.

Chapter 2 describes the Proposed Action (Project Description), the Action/Project alternatives development, and the screening process conducted for the Project alternatives. It presents a range of reasonable alternatives that address the stated purpose and need for the Project and identifies and explains why other alternatives were considered but not analyzed in detail.

Chapter 3 describes the affected environment (environmental setting, 14 CCR § 15125) for 20 environmental resource and issue areas relevant to that area that would be affected by the Proposed Action. The regional and background information and regulatory framework for each environmental resource topic are summarized in Appendix D. Please see Section 1.8.2 for a list of the resource topics covered in this Final PA/EIS/EIR.

Chapter 4 provides a comprehensive analysis and assessment of direct, indirect, and cumulative impacts (environmental consequences) and mitigation measures (by environmental resource and issue area) for the Proposed Action and alternatives (including a No Action

Alternative). It also describes other aspects of BLM compliance with NEPA procedures, including any residual impacts. Please see Section 1.8.2 for a list of the resource topics covered in this Final PA/EIS/EIR.

Chapter 5 presents analyses of other NEPA and CEQA issues, including any irreversible or irretrievable commitments of resources (40 CFR § 1502.16), significant irreversible environmental changes, growth-inducing impacts, and unavoidable significant environmental impacts under CEQA.

Chapter 6 identifies the persons, groups, agencies, and other governmental bodies that were consulted or that contributed to the preparation of the Final PA/EIS/EIR; describes Native American consultations and public participation during scoping; provides a list of Final PA/EIS/EIR preparers; and lists agencies, organizations, and persons to whom the Final PA/EIS/EIR will be sent.

Appendices contain information that supplements or supports the analyses in the body of the Final PA/EIS/EIR, as follows:

- Appendices A through C provide the figures, acronyms, glossary, and references associated with the PA/EIS/EIR document;
- Appendix D provides the regional and background information and Applicable Regulations, Plans, and Standards for each of the resources analyzed;
- Appendices E and F provide analyses of the Project with respect to land management plans;
- Appendix G provides the mitigation measures developed for the Project;
- Appendix H provides the Public Scoping Report; and
- Appendices I through Y provide the technical reports developed by the Applicant to support the environmental analysis of the Project.

The baseline physical conditions as analyzed in the technical reports are the conditions that existed at the time of the issuance of the NOI for the preparation of a Draft PA and EIS, and Notice of Preparation (NOP) of an EIR (state CEQA Guidelines Section 15125(a)) in March, 2015.

Table 1-1. Recommended PA/EIS/EIR Sections and Required Elements

Final PA/EIS/EIR Section	Recommended NEPA EIS Sections	CEQA Required Element/ State CEQA Guidelines
Table of Contents	N/A	Table of Contents (Section 15122)
Executive Summary	N/A	Summary (Section 15123)
Chapter 1	Introduction Identifying Information Location of Proposal Purpose and Need for Action and Decision to be Made Scoping and Public Involvement Issues	Project Description (Section 15124) Regional Map Project Objectives List of Agencies Expected to Use EIR List of Required Permits and Approvals List of Related Review and Consultation Requirements

Table 1-1. Recommended PA/EIS/EIR Sections and Required Elements

Final PA/EIS/EIR Section	Recommended NEPA EIS Sections	CEQA Required Element/ State CEQA Guidelines
Chapter 2	Proposed Action and Alternatives Description of Proposed Action Description of Alternatives Analyzed in Detail Alternatives Considered but not Analyzed in Detail	Project Description (Section 15124) Precise location and boundaries of the Project Project's Characteristics Alternatives to the Proposed Project (Section 15126)
Chapter 3	Affected Environment	Environmental Setting (Section 15125) Effects Found Not to Be Significant (Section 15128)
Chapter 4	Environmental Effects Direct and Indirect Effects Cumulative Effects Residual Effects Identify and analyze mitigation measures, if any	Environmental Impact Analysis (Section 15126) Significant Environmental Effects Significant Environmental Effects that Cannot Be Avoided Mitigation Measures Cumulative Impacts (Section 15130) Alternatives Evaluation (15126.6)
Chapter 5	Irreversible or irretrievable commitments of resources (40 CFR §1502.16)	Long-Term Implications of the Proposed Project (Section 15126.2) Significant Irreversible Environmental Changes Growth-Inducing Impacts
Chapter 6	Tribes, Individuals, Organizations, or Agencies Consulted List of Preparers	List of Organizations, Agencies, and Persons Consulted and List of Preparers (Section 15129)

N/A = not applicable

1.8 Scoping/Issues Addressed in the Analysis

1.8.1 Scoping Process

The BLM and County solicited internal and external input on the issues, impacts, and potential alternatives to be addressed in the Final PA/EIS/EIR for the Project, as well as the extent to which those issues and impacts would be analyzed in the document. This process is called “scoping” (40 CFR §1501.7; 14 CCR §§ 15082[a], 15103, 15375). Internal input was provided by the BLM, Riverside County, and cooperating agencies as an interdisciplinary process, to help define issues, alternatives, and data needs. External scoping involved notification and opportunities for feedback from other agencies, organizations, tribes, local governments, and the public. Formal public scoping began following publication of a NOI under NEPA and release of a NOP under CEQA.

The NOI for the Proposed Action was published in the Federal Register on March 6, 2015 (80 FR 12195). The NOP was issued on March 13, 2015. In addition to being published in the NOI and NOP, information regarding the public meetings was published in the Parker Pioneer, Desert Sun, and Palo Verde Times on March 18, 2015. The meetings were also were announced on the BLM website for the Project, at http://www.blm.gov/ca/st/en/fo/palmsprings/Desert_Quartzite.html. Notice of the meetings was also mailed to 190 recipients, which included agencies, Native American tribes, organizations, and interested individuals. Copies of the NOP were provided to the Office of Planning and Research (State Clearinghouse) for issuance to state agencies. One hundred and ninety copies of the NOP were distributed to Federal, state, and local agencies,

responsible and trustee agencies, local governments, private organizations, Native American tribes, and other interested parties.

The NOP announced the dates, times, and locations of public scoping meetings in Parker, Arizona on March 23, 2015, and in Blythe, California, on March 24, 2015, and both BLM and the County posted the appropriate notices in local news media, newspapers, and the BLM website at <http://www.blm.gov/ca/st/en/fo/cdd.html>. The purpose of the meetings was to inform the public about the Project; describe the purpose and need of the Project; provide information regarding the environmental review process; and gather public input regarding the scope and content of the Final PA/EIS/EIR. The BLM, County, and Applicant presented information about the Project, alternatives, environmental review process, and potential impacts. Following the presentations, members of the public were invited to make verbal comments. A total of four individuals made public comments at the meeting in Parker, and two individuals made public comments at the meeting in Blythe. At the conclusion of the public comments, staff members from the agencies and the Applicant were available to answer questions and gather input.

The comment period for the NOI and NOP began on March 6, 2015, and ended on April 13, 2015. A total of nine written comment letters were submitted to BLM, 13 written comment letters were submitted to the County, and four comment letters were jointly submitted to both agencies. Comments received during the scoping process are provided in Appendix H, *Public Scoping Report* and raised the following issue topics:

- Air Quality
- Alternatives
- Biological Resources
- BLM Procedures
- Cultural Resources
- Environmental Justice and Impacted Communities
- Fire
- Climate Change
- Hazardous Materials/Hazardous Waste/Solid Waste
- Indirect and Cumulative Impacts
- Land Use
- Public Health
- Purpose and Need
- Tribal Governments
- Visual Resources
- Water Resources

1.8.2 Resources Analyzed

The following environmental resources have a potential to be affected by activities related to the proposed Project and alternatives and thus are evaluated in this Final PA/EIS/EIR:

- Air Resources
- Biological Resources – Vegetation
- Biological Resources – Wildlife
- Cultural Resources
- Geology and Soils
- Climate Change
- Hazards and Hazardous Materials
- Lands and Realty
- Mineral Resources
- Noise
- Paleontological Resources
- Recreation
- Socioeconomics and Environmental Justice
- Special Designations
- Traffic and Transportation
- Utilities and Public Services
- Visual Resources
- Water Quality

The following environmental resources are either not present or not impacted by the proposed Project or Alternatives, and therefore not discussed in detail in this Final PA/EIS/EIR:

- Forestry
- Livestock Grazing
- Wild Horses and Burros

None of these resources or activities are located on the site, or in areas that could be impacted by the Proposed Action. There is no forest land located on or near the site. There is no livestock grazing within the East Riverside SEZ, and no wild horse or burro populations. Accordingly, impacts to these resources are unlikely to occur.

1.9 Draft PA/EIS/EIR Public Review and Final PA/EIS/EIR

The Draft PA/EIS/EIR NEPA Notice of Availability (NOA) and CEQA Notice of Completion were published, and the public comment period began, on August 10, 2018. Two public meetings were held, one on September 26, 2018, in Palm Desert, California, and one on September 27, 2018,

in Blythe, California. The public comment period remained open until November 8, 2018. A total of 24 individual public comments were received, including two comments made verbally at the public comment meeting on September 27, and 22 comments provided in writing by e-mail or letter. Public comments are provided in Appendix Z, and responses to the comments are provided in Appendix AA.

This Final PA/EIS/EIR incorporates the following revisions from the Draft PA/EIS/EIR:

- Text modifications required to add or clarify technical information and analysis, in response to public comments;
- Additional text provided to incorporate new information obtained since publication of the Draft PA/EIS/EIR; and
- Revision of the document in order to achieve the streamlining goals of Executive Order 13807 and Secretary's Order 3355.

The only substantive change made in the Proposed Action or alternatives is the location of the gen-tie line in Alternatives 2 and 3. In the Draft PA/EIS/EIR, the location of the gen-tie line within Corridor K/Section 368 Federal Energy Corridor 30-52 along the northern boundary of the Project area was the same in each of the three action alternatives. However, since publication of the Draft PA/EIS/EIR, BLM has determined that the proposed 10 West transmission line may also occupy the Corridor K/Section 368 Federal Energy Corridor 30-52, and that the transmission lines may conflict with each other. To address this potential conflict, the route of the gen-tie line in Alternatives 2 and 3 has been revised. Instead of crossing directly northward from the On-Site Substation to the corridor, the gen-tie line would cross in a generally diagonal direction to the northwest, until it reaches the western boundary of the ROW application area. At that location, the line would traverse directly north into the corridor, cross directly west within the corridor to the northeastern corner of the CRSS, and then cross directly south to enter the CRSS. The northwest oriented portion of the re-aligned gen-tie line would also include a new section maintenance road. This modification is shown in revised Figures 2-9 and 2-10, and results in slight changes to the acreages of various resources impacted under Alternatives 2 and 3. However, the re-alignment generally reduces impacts to biological resources associated with sand deposits, including the Harwood's eriastrium and Mojave fringe-toed lizard.

In addition to revision of the text, additional documentation is provided in the appendices. New supporting technical reports, including a Bird and Bat Conservation Strategy (BBCS; WEST 2019), a Paleontological Resources Survey Report (El Adli 2018), a Class III Cultural Resources Survey (Addendum 2; Lerch 2019a) incorporating site testing results, a Class III Cultural Resources Survey (Addendum 3; Lerch 2019b) analyzing cultural resource impacts associated with the realigned gen-tie line, and a Visual Resources Technical Report Addendum (URS 2019) have been developed since the publication of the Draft PA/EIS/EIR, and are included. The BBCS has been added to the previous biological reports in Appendix M. The Paleontological Resources Survey Report has been added to the previous Preliminary Paleontological Resources Technical Report in Appendix T. The Addendum 2 and Addendum 3 to the Class III Cultural Resources Survey Report have been added to the previous cultural resources reports in Appendix P. The addendum to the Visual Resources Technical Report has been added to the previous Visual Resources Technical Report in Appendix U.

In order to streamline the environmental review process, as required by Executive Order 13807 and Secretary's Order 3355, the Final PA/EIS/EIR also incorporates revisions intended to reduce the size and complexity of the Draft PA/EIS/EIR, and to focus the Final PA/EIS/EIR more directly on the specific impacts of the Proposed Action and alternatives. To achieve this, the Final PA/EIS/EIR incorporates the following revisions:

- Redundant text has been deleted. This includes project background text in the Executive Summary, which simply repeated text in Chapters 1 and 2. It also includes re-statements of project description information. The description of the Proposed Action and alternatives, including the associated acreages, is provided in Chapter 2. Where this background information was repeated in Chapters 3 and 4, it has been deleted.
- Text introducing the purpose or contents of a subsection has been deleted. This mostly affected the resource-specific subsections in Chapter 3.
- Encyclopedic, regional, and background information in Chapter 3 which was not directly relevant to onsite resources and/or impacts has been moved to Appendix D. The purpose of this revision is not to dismiss the importance of the background material to the analysis, but to focus the analysis directly on the resources which are present on the project site.

In general, none of the changes to the Proposed Alternatives, or to the text of the Final PA/ES/EIR, involve new information that would require re-circulation of the Draft PA/EIS/EIR under NEPA or CEQA.

1.10 Permits and Approvals

Review and approval of the Proposed Action is within the primary jurisdiction of the BLM for those portions of the Proposed Action that would be constructed, operated, maintained, and decommissioned on BLM-administered public land, and within the County's primary land use jurisdiction for those portions of the Proposed Action that would be developed and operated on privately owned or County-owned land within its jurisdiction. The BLM may issue a ROD making a decision regarding the issuance of the ROW grant for the portions of the Proposed Action on public land. The County may issue the CUP and/or PUP for the portions on private land and County-owned land. Other Federal, state, and local agencies also could exercise authority over specific elements of the Proposed Action with respect to air quality and greenhouse gas emissions, land use, biological and cultural resources, stormwater drainage and hydrology issues, roadway easements, and crossing encroachments.

Table 1-2 below provides a list of the anticipated Federal, state, and local permits and approvals that would be required for the proposed Project and the agencies that are anticipated to rely on the Final PA/EIS/EIR. Other relevant resource- and issue-specific laws, regulations, plans, and policies applicable to the proposed Project are summarized in Appendix D. Please refer to Chapter 6, *Coordination, Consultation, and Public Involvement* for a detailed discussion on consultations and persons consulted for the proposed Project and alternatives.

1.10.1 Related Federal Review and Consultation Requirements

In addition to complying with NEPA, the BLM will comply with other Federal regulations and authorizations and conduct necessary consultations regarding the resources potentially affected by the proposed Project. Such consultations include but are not limited to:

- United States Fish and Wildlife Service (USFWS): The USFWS has jurisdiction to protect threatened and endangered species under the Endangered Species Act (ESA) (16 U.S.C. § 1531 et seq.). Under Section 7 of the ESA, the BLM is obligated to conduct informal and, if necessary, formal consultation with the USFWS relative to Federal actions that may adversely affect a Federally listed species.
- Section 106 of the National Historic Preservation Act (NHPA), as amended, 54 U.S.C. § 100101 et seq., (36 CFR Part 800), requires Federal agencies to take into account the effects of a proposed undertaking on historic properties and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment (36 CFR Part 800.1(a)). The Section 106 process seeks to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties. The goal of consultation is to identify historic properties potentially affected by the undertaking, assess the undertaking's effects, and seek ways to avoid, minimize, or mitigate any adverse effects on historic properties (36 CFR Part 800.1).
- Government-to-Government Consultation: In addition to the requirements of the NHPA and NEPA, the BLM is required to consult with Native American tribes according to Executive Order 13175, Consultation and Coordination with Indian Tribal Governments, which directs Federal agencies to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Native American tribes, and to reduce the imposition of unfunded mandates upon Native American tribes. Also, the Presidential Memorandum for the Heads of Executive Departments and Agencies Regarding Government-to-Government Relations with Native American Tribal Governments, issued November 5, 2009, directs executive departments and agencies to engage in regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, and to strengthen the government-to-government relationship between the United States and Native American tribes. Government-to-government consultation between the BLM and tribal governments is an ongoing process that will continue even after the Section 106 process for the proposed Project has been completed.
- The USACE has jurisdiction to protect navigable and interstate waters (waters of the United States), including water quality and wetland resources, under Section 404 of the Clean Water Act (CWA). Under that authority, the USACE regulates the discharge of dredged or fill material into waters of the United States, including wetlands and tributaries, by reviewing proposed projects to determine whether they may impact such resources and, thereby, are subject to a Section 404 permit. Alternatively, minor impacts may be covered under one of several nationwide permits. On May 8, 2015, the Applicant submitted a request to the Los Angeles District of the USACE for an approved Department of the Army Jurisdictional Determination (JD) for the Project site. Additional field data in support of

the request were submitted to the USACE in October 2015. In a letter dated February 18, 2016, the USACE determined that waters of the United States do not occur on the Project site. The letter is attached to the Federal Jurisdictional Delineation provided in Appendix I.

1.10.2 Related State and Local Review and Consultation Requirements

Ancillary permits, including encroachment permits, grading and construction permits, and certificates of occupancy, are anticipated from the County. These permits and approvals are generally local ministerial actions, but to the extent they are discretionary, they will follow environmental review in compliance with CEQA. Other state and local agencies or regulatory entities that could exercise authority over specific elements of the proposed Project include:

- Riverside County Airport Land Use Commission (ALUC): The ALUC has reviewed the proposed solar facility layout, transmission components, glint and glare analysis, and ancillary facilities to determine the consistency of the Project with the 2004 Blythe Airport Land Use Compatibility Plan.
- California Department of Fish and Wildlife (CDFW): Informal consultation will occur with the CDFW, Inland Desert Region, concerning the scope of biological resource studies and species of interest relative to the entire Project area. The Applicant will also consult with CDFW to avoid or obtain a permit for impacts to state waters.
- Mojave Desert Air Quality Management District (MDAQMD): Permits regulating air pollutant emissions during Project construction, operation, maintenance, and decommissioning are anticipated to be issued by the MDAQMD upon demonstration that the Project will comply with local air regulations.
- Native American Heritage Commission (NAHC): The Applicant has submitted a letter to the NAHC requesting a list of Native American tribes that should be contacted for information about cultural resources that may occur on or in close proximity to the proposed Project area, as well a Sacred Lands File search. Information requests were submitted to the listed Tribes via United States mail.
- California Independent System Operator (CAISO): On December 15, 2010, the Applicant submitted a request to CAISO for a secured interconnection queue position. This is a necessary element of being able to transmit generated power to the statewide electric grid.
- Department of Defense: As required by California Senate Bill 1462 (2004), the County will notify the DoD that the Project is being planned, and invite consultation, if needed, to determine the potential impact on military overflights and operations.

Consultation under AB 52 is not applicable to the Project because the date of the NOP for the DQSP was March 12, 2015, prior to the effective date of AB 52 on July 1, 2015.

The Project is being evaluated pursuant to the Riverside County General Plan (RCGP) (Riverside County 2015a). Land Use Policy LU-17.2 of the RCGP states: "Permit and encourage, in an environmentally and fiscally responsible manner, the development of renewable energy resources and related infrastructure, including but not limited to, the development of solar power plants in the County of Riverside." In connection with General Plan Amendment 1080, Riverside also

enacted Ordinance No. 348.4705, which amended the zoning code to allow a solar power plant on a lot 10 acres or larger in certain zoning districts, upon issuance of a use permit.

Table 1-2. Anticipated Permits and Approvals

Authority or Approving Agency	Permit or Approval	Triggering Action	Statutory Reference
Federal			
BLM	Grant of long-term ROW	Proposed solar facility and gen-tie line construction and operation would occur, in part, on lands under BLM management	Federal Land Policy and Management Act of 1976 (PL 94-579), 43 U.S.C. §§1761-1771; 43 CFR Part 2800. National Environmental Policy Act of 1969 as amended (PL 91-190), 42 U.S.C. §4332, and related statutes
	Grant of short-term ROW	Temporary construction areas that would not be included in long-term ROW.	Federal Land Policy and Management Act of 1976 (PL 94-579), 43 U.S.C. §§1761-1771; 43 CFR Part 2800. National Environmental Policy Act of 1969 as amended (PL 91-190), 42 U.S.C. §4332, and related statutes
	ROW permits for pre-construction activities	Permits are required for the Applicant to enter the site to perform site assessment activities such as geotechnical investigations, groundwater well installation, and placement of a meteorological tower, as well as for pre-construction site clearance.	Federal Land Policy and Management Act of 1976 (PL 94-579), 43 U.S.C. §§1761-1771; 43 CFR Part 2800. National Environmental Policy Act of 1969 as amended (PL 91-190), 42 U.S.C. §4332, and related statutes
	Section 106 Compliance	BLM will consult with the State Historic Preservation Office and tribal governments to meet Section 106 consultation requirements.	National Historic Preservation Act
	Cultural Resource Use Permit	Testing may be required to determine the National Register of Historic Places significance and eligibility of identified sites.	Archaeological Resources Protection Act
	Field work authorization	The Applicant obtained a BLM Fieldwork Authorization Permit prior to conducting Class III archaeological resource inventories.	Federal Land Policy and Management Act of 1976 (PL 94-579), Sec. 302 (b), 43 USC 1732, Sec. 4 of P. L. 96-95, October 31, 1979, 16 USC, 470cc
U.S. Fish and Wildlife Service	Endangered/Threatened Species Consultation and Incidental Take Permit	Proposed solar facility and gen-tie line construction and operation may impact Federally-listed species	Endangered Species Act
Bureau of Reclamation	Project review	Coordination regarding the Draft Groundwater Accounting Surface	N/A

Table 1-2. Anticipated Permits and Approvals

Authority or Approving Agency	Permit or Approval	Triggering Action	Statutory Reference
State of California			
California Department of Fish and Wildlife	Endangered/Threatened Species Take Authorization	Proposed solar facility and gen-tie line construction and operation may impact state-listed species	California Endangered Species Act (CESA)
	Lake or Streambed Alteration Agreement	Proposed construction and operation may potentially impact sensitive biological resources	California Fish and Game Code, Section 1601
State Water Resources Control Board – California Water Quality Control Boards for Colorado River Region	Demonstrate compliance with General Discharge Permits for Storm Water Associated with Construction Activity	Proposed construction may involve storm water discharges to surface Waters of the State	Clean Water Act, Section 401
Mojave Desert Air Quality Management District	Dust Control Plan	Proposed construction would generate fugitive dust	MDAQMD Rule 403
County of Riverside			
County of Riverside	Conditional Use Permit, Public Use Permit, Development Agreement	Proposed construction and operation of a portion of the Project located within County jurisdiction	County of Riverside Zoning Ordinance (Ordinance No. 348; CEQA, California Public Resources Code, Sec. 21000 et seq.
Riverside County Airport Land Use Commission	Director’s Determination	Portions of the Project located within Compatibility Zone E.	Policy 1.5.2(d) of the Countywide Policies of the 2004 Riverside County Airport Land Use Compatibility Plan

1.11 Contact Persons

Please contact the following individuals regarding questions and concerns about the Project:

NEPA Lead Agency:

Brandon Anderson, Project Manager
Bureau of Land Management
Palm Springs-South Coast Field Office
1201 Bird Center Drive
Palm Springs, CA 92262

CEQA Lead Agency:

Russell Brady
Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409

CHAPTER 2 PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

This chapter describes the Applicant’s proposal to construct, operate, maintain, and decommission a 450 MW solar PV energy generating facility and related infrastructure in unincorporated Riverside County, California, to be known as the Desert Quartzite Solar Project (DQSP; the “Project” or the “Proposed Action”) on a combination of public land administered by the BLM and private land under the jurisdiction of the County. This chapter also describes alternatives to the Project, including a Resource Avoidance Alternative that would support a 450 MW solar PV facility, a Reduced Project Alternative that would support a 285 MW solar PV facility, and a No Action Alternative as required by NEPA and CEQA. Finally, this chapter describes the alternatives screening process, including alternatives that were considered but eliminated from detailed analysis.

2.2 Alternatives

NEPA and CEQA both require consideration of a reasonable range of alternatives to the proposed Project that have the potential to feasibly attain most of the basic objectives of the Project, and to meet the Federal purpose and need. In addition, CEQA requires the consideration of how to avoid or substantially lessen any of the significant or adverse effects caused by the Project. The NEPA and CEQA requirements for the identification of Project alternatives are described below.

2.2.1 NEPA and CEQA Requirements for Alternatives

Under NEPA, a Federal agency undertaking a “major Federal action” significantly affecting “the quality of the human environment” must prepare an EIS. 42 USC § 4332(2)(C). NEPA requires the BLM to “study, develop, and describe appropriate alternatives to recommended courses of action in any proposal that involves unresolved conflicts concerning alternative uses of available resources”. The range of appropriate alternatives is governed by a “rule of reason.” An agency need only consider feasible and distinguishable alternatives reasonably related to the purposes of the project. It is not required to undertake an analysis of alternatives with substantially similar consequences as the proposed action.

Similar to NEPA, a rule of reason also governs the range of alternatives under CEQA. An agency need not consider alternatives that (i) fail to meet most of the basic project objectives, (ii) are infeasible, or (iii) cannot avoid significant environmental impacts. More specifically, state CEQA Guidelines Section 15126.6 states the following:

- (a) An EIR shall describe a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.
- (b) The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

(c) The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

(d) The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

(e) The EIR shall include the evaluation of the "No project" alternative.

(f) The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

In accordance with the foregoing principles, the Federal and state lead agencies identified the alternatives below to be carried forward and analyzed in this Final PA/EIS/EIR.

2.2.2 Alternatives Development and Screening Process

Alternatives were evaluated using the criteria set forth in Section 6.6.3 of the BLM NEPA Handbook, which provides that an action alternative may be eliminated from detailed analysis if:

1. It is ineffective (it would not respond to the BLM's purpose and need);
2. It is technically or economically infeasible;
3. It is inconsistent with the basic policy objectives for the management of the area (such as, not in conformance with the land use plan (i.e., the CDCA Plan);
4. Its implementation is remote or speculative;
5. It is substantially similar in design to an alternative that is analyzed; or
6. It would have substantially similar effects to an alternative that is analyzed.

Similarly, state CEQA Guidelines 15126.6(f) specifies that "The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project."

The Project, Resource Avoidance Alternative, and Reduced Project Alternative were found to meet the specified requirements, and were therefore carried forward for more detailed analysis in Chapter 4. The No Action Alternative is described in Section 2.7, and the NEPA Preferred/CEQA Environmentally Superior Alternative is described in Section 2.8. Potential alternatives that met BLM's exclusionary criteria were eliminated from further analysis, and are described in Section 2.9.

2.2.3 Proposed Land Use Plan Amendment Decisions

The BLM has determined that a PA would be required if a ROW were granted for a solar power generating facility on the proposed site.

The Final Western Solar Plan and Record of Decision (ROD) and the DRECP recognize the DQSP as a “pending” ROW application (Western Solar Plan §9.4.22.2, p. 9.4-133; DRECP Section II.3.2.4, p. 68-69). Pending applications like the DQSP are not subject to the Western Solar Plan ROD (Western Solar Plan ROD Section B.1.2), the DRECP, or to the CDCA plan amendments made in those decisions. Therefore, if the BLM elects to approve the ROW grant application for the DQSP, a Project-specific PA, summarized in PA1, below would be required. Any subsequently filed applications for the Project site would, however, be subject to the Solar Energy Program and associated land use plan amendments.

The proposed gen-tie line would be sited almost entirely within BLM’s Utility Corridor K and Section 368 Federal Energy Corridor 30-52 (referred to as Corridor K/30-52 in this Final PA/EIS/EIR). Section 368 of the Energy Policy Act of 2005 (P.L. 109-58) required Federal agencies to engage in transmission corridor planning (see Section 1.6.2.1 of the Draft Solar PEIS). As a result of this mandate, the BLM, DOE, USFS, and DoD prepared a PEIS to evaluate the designation of energy corridors on Federal lands in 11 western states (BLM 2009). The BLM and USFS issued RODs to amend their respective land use plans to designate numerous corridors, often referred to as Section 368 corridors. BLM’s Utility Corridor K, originally designated by BLM in the CDCA Plan, was also designated as a Section 368 Federal Energy Corridor 30-52 in the DOE and DOI PEIS.

The interconnection point for the Project, the Colorado River Substation (CRSS), is sited approximately 1,500 feet south of the southern boundary of Corridor K/30-52. Consequently, the portion of the gen-tie corridor between the corridor and the CRSS would be located outside of the corridor, and would require consideration through the CDCA plan amendment process. Therefore, if the BLM elects to approve the ROW grant application for the DQSP, a Project-specific PA, summarized in PA2 below, would be required.

As discussed in Section 2.3.7.13, approval of the Project would require closure of 6.8 miles of currently open routes within the Project area. Under the NECO Plan, closure of routes requires a plan amendment. Therefore, if the BLM elects to approve the ROW grant application for the DQSP, a Project-specific PA, summarized in PA3 below, would be required.

The PA decisions considered in the Final PA/EIS are:

PA1: The CDCA Plan would be amended to identify the development footprint as suitable for the proposed type of solar energy use. This would be adopted if a ROW were granted for the Project, the Resource Avoidance Alternative, or the Reduced Project Alternative.

PA2: The CDCA Plan would be amended to authorize the portion of the gen-tie corridor which is located outside of BLM’s Utility Corridor K and Section 368 Federal Energy Corridor 30-52. This would be adopted if a ROW were granted for the Project, the Resource Avoidance Alternative, or the Reduced Project Alternative.

PA3: The CDCA Plan would be amended to close 6.8 miles of routes that currently exist within the project area. This would be adopted if a ROW were granted for the Project, the Resource Avoidance Alternative, or the Reduced Project Alternative.

If these three decisions are not taken, the CDCA Plan would not be amended. This would result if the No Action Alternative were selected.

2.3 Features Common to all Action Alternatives, Including the Proposed Action

This section details the Project components that would be developed if any of the action alternatives were approved, regardless of the particular solar plant layout selected. Distinctions specific to each action alternative are detailed in Section 2.4 relating to the Proposed Action; in Section 2.5 relating to the Resource Avoidance Alternative; and in Section 2.6 relating to the Reduced Project Alternative.

Each of the three action alternatives consists of the solar facility, a gen-tie line to connect the solar facility to the CRSS, O&M facility, an On-Site Substation, access roads, and other ancillary facilities.

2.3.1 Overview

The Applicant proposes to construct, operate, maintain, and decommission the DQSP in the southern California inland desert (Figure 2-1). The Project would occupy a total land area of approximately 3,770 acres. This includes 3,560 acres for the portion of the solar facility on BLM land; 54 acres for the 2.79-mile long, 160 foot wide transmission line (generation interconnection [gen-tie]) corridor on BLM land; 2 acres for the offsite portion of a buried telecommunications line and possible above-ground electrical service line on BLM land; and 154 acres for the portion of the solar facility on private land. The final ROW grant for the Project would be 3,616 acres of BLM land, and the County authorization for use of the private land would cover 154 acres. The Project would also require 61 acres of temporary work areas for construction (Figure 2-2). The Project would generate up to 450 MW using solar photovoltaic (PV) technology.

The Applicant provided the technical information about the Project components that are described in this section. All quantities, including those referring to land disturbance, equipment, schedule, mileage, and workforce, are based on the most current data available and generally represent conservative estimates for purposes of analyzing impacts. The numbers may change based on final engineering and various agencies' permit requirements.

In addition to the ROW application to use BLM land, the Applicant submitted a Conditional Use Permit Application (Application for Land Use and Development, Form 295-1010) to the County on February 25, 2015 (Riverside County CUP No. 3721). That application requests a permit to develop 160 acres of private land adjacent to, and surrounded on all sides by, the lands requested in the BLM ROW application.

The POD and 2015 County application are the primary sources of Project description information on which this section is based. Both the BLM POD and County applications have been supplemented with additional Project details, in the form of letters submitted to the BLM and the County, technical reports, management plans, and responses to requests for additional information.

Based on this input, key components of the Project are:

1. The solar plant site, which would include the solar arrays; power conversion systems; an On-Site Substation; an operations and maintenance (O&M) facility; a meteorological

station; a guard shack; groundwater wells; energy storage systems; and related infrastructure and improvements; and

2. An overhead 230 kilovolt (kV) gen-tie line (maximum of 135 feet tall), connecting the solar plant site to the CRSS.

The key features of the Project are shown in Figure 2-2, and are discussed in the following subsections.

2.3.2 Site Description

2.3.2.1 Location

The DQSP would be located approximately 2.75 miles southwest of the City of Blythe, just south of the Interstate 10 (I-10) freeway, and 1.5 miles southwest of Blythe Airport in Riverside County, California (Figure 2-1). The Applicant is seeking a ROW grant from BLM, as well as authorization from the County to develop an approximately 160-acre parcel of private land that is surrounded by the BLM land. The portion of the ROW for the proposed gen-tie line would exit the solar facility at the northwest corner, and traverse approximately 2.79 miles west to the CRSS.

2.3.2.2 Legal Description

A legal description of the Project Site CACA-049397 is provided in Table 2-1. Figure 2–2 shows the Project Site Boundary in relation to the Public Land Survey System, along with land ownership of the Project Site and adjacent lands. The DQSP would be located primarily on BLM-administered land, within Sections 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 22, 23, and 24 of Township 7S, Range 21E, San Bernardino Base and Meridian.

The privately owned parcel consists of Assessor’s Parcel Number 879-110-001, in Section 15 of Township 7S, Range 21E, San Bernardino Base and Meridian. First Solar Development, LLC has executed an agreement with the private land owner for an option to purchase the private land which would be used as a part of the DQSP. The Project does not include any County real property or County right-of-way.

Table 2-1. Legal Description of the Project Site Area

All lands located in Township 7S, Range 21E, San Bernardino Base and Meridian

BLM Lands	
Section 3	W1/2, W1/2E1/2, S1/2SE1/4SE1/4, Lots 4, 5, 6
Section 4	S1/2S1/2S1/2
Section 5	S1/2S1/2S1/2
Section 6	S1/2S1/2SE1/4
Section 7	NE 1/4
Section 8	NW1/4NW1/4, SW1/4NW1/4
Section 9	E1/2
Section 10	All
Section 11	N1/2, SW1/4
Section 12	NW1/4, N1/2SW1/4
Section 13	N1/2, SW1/4, W1/2SE1/4, All that area NW CA 08974

Table 2-1. Legal Description of the Project Site Area

All lands located in Township 7S, Range 21E, San Bernardino Base and Meridian

Section 14	S1/2NE1/4, W1/2, SE1/4
Section 15	NW1/4, N1/2SW1/4, SE1/4, All that area NE of CA 4163
Section 22	NE1/4NE1/4, All that area NE of CA 4163
Section 23	N1/2, NE1/4SW1/4, SE1/4, All that area NE of CA 4163
Section 24	N1/2NW1/4, SW1/4NW1/4, NW1/4SW1/4, All that area NW of CA 8974
Private Lands under County Jurisdiction	
Section 15	NE 1/4

2.3.2.3 Onsite and Adjacent Land Uses

The portion of the Project area located on BLM land is currently undeveloped. The 160-acre private parcel was previously the location of a jojoba farm. A detailed description of the adjacent and nearby land uses is provided in Section 3.10.1.4.

2.3.3 Facilities

The DQSP would consist of a single unit with a generating capacity of 450 MW that may be constructed in phases. The proposed facilities on BLM-managed public land would include solar arrays, gen-tie line, O&M building, internal access roads, groundwater production wells, On-Site Substation, and ancillary facilities. The only facilities to be placed on the private land parcel would be solar arrays, access roads, and power distribution lines. The only linear facilities extending out of the solar plant site would be the gen-tie line, its associated access road, an above-ground electrical service line, and a buried telecommunications line. The primary ingress and egress to the Project would use existing access roads. The secondary access route would require construction of approximately 0.7 miles of new road near the southeastern boundary of the Project.

The number and size of Project-related facilities would vary among the Project alternatives. The facilities associated with the Proposed Action are discussed in detail in Section 2.4, the facilities associated with Alternative 2 are discussed in Section 2.5, and the facilities associated with Alternative 3 are discussed in Section 2.6. The following subsections discuss the characteristics and features of the facilities.

2.3.3.1 Solar Panels and Arrays

The Project would involve the installation of photovoltaic modules mounted on either single-axis horizontal tracker structures, fixed tilt mounting systems, or a combination of these two mounting systems. The solar facility would generate up to 450 MW of alternating current (AC) power. The principal materials used in the PV panels and mounting systems are glass, steel, and various semiconductor metals. The specific type of solar panels to be used would be determined as part of final Project design. The Proposed Action assumes that commercial panels, available to any potential developer, would be used. An alternative that assumes use of thin-film cadmium telluride (CdTe) panels is developed as Alternative 2, the Resource Avoidance Alternative, which is discussed in Section 2.5.

The mounting system for the PV modules would consist of steel posts driven into the ground. The Applicant has conducted a Preliminary Geotechnical Investigation, and estimates that posts for fixed-tilt structures would need to be driven between 4 and 7 feet into the ground, and posts for single-axis tracking structures would need to be driven up to 12 feet into the ground. During pre-construction, the Applicant would conduct more field geotechnical investigations which would include borings to evaluate subsurface conditions. If these field investigations result in identifying a more optimal foundation, then the Applicant may propose other embedded foundation designs, including cement foundations, to BLM and the County. Tilt-brackets would be bolted onto the steel posts, and either steel table frames (for fixed tilt) or tracker structures would be bolted onto the brackets. The PV panels would then be mechanically fastened to the table frames or tracker structures.

If fixed-tilt arrays, which do not track the sun, are used, they would be positioned in a south-facing orientation at a tilt between 20 and 25 degrees from horizontal (ground surface) to receive optimal solar energy throughout the year. The arrays would be installed in rows oriented in an east-west direction. The maximum height of the fixed-tilt arrays above the ground surface would be 13 feet.

An example of a typical horizontal tracker PV array is shown in Figure 2-3. If single-axis horizontal trackers are used, the PV modules would be mounted horizontally (not tilted to the south). The arrays would be installed in rows oriented in a north-south direction. Panels would be powered by drive motors to track the east-west path of the sun throughout the course of a day. The maximum height of a module on a horizontal tracker during the course of a day would be 13 feet. The minimum height would be approximately 1.5 to 2 feet above the ground surface.

The assemblies would be organized into arrays, as shown in Figure 2-4. Each array would be approximately 800 feet long, and 500 feet wide, but may vary depending on technology and array design. The exact placement of the arrays within the Project area would be based on topography, hydrology, and geotechnical conditions, and may also be modified to avoid environmentally sensitive resources. Prior to ground-breaking activities and issuance of a Notice to Proceed by the authorized officer, all final design features and placement of all Project facilities would be included in the approved POD.

2.3.3.2 Power Distribution

The PV modules would be electrically connected to each other by wire harnesses and combiner boxes that collect power from several rows of modules. Underground direct current (DC) cables would then lead to a Power Conversion Station (PCS), which would be situated within each array. Alternatively, above-ground cables may be used and attached to the array posts 1 to 4 feet above the ground. A typical PCS is shown in Figure 2-5. The PCS would use inverter hardware to convert the DC electric output of the solar panels into grid-quality AC electric output. A transformer located at each PCS would then step up the voltage of the output to medium voltage AC (MVAC) at approximately 34.5 kV, before it is transmitted to one of several PV Combining Switchgear (PVCS) units, which would be housed in cabinets dispersed among the arrays. A typical PVCS is shown in Figure 2-6. Each PVCS would collect power from a group of arrays, and then transmit it to the On-Site Substation through overhead high-capacity collection system lines. As an alternative to the PCS, the low voltage DC would be stepped up to medium voltage DC (MVDC) at several converters throughout the site and transmitted to one or more MVDC to MVAC inverters. The overhead lines would be carried on wood or steel poles with a maximum

height of 70 feet. The PCSs, converters, and transformers would be situated on concrete vaults or bases.

The On-Site Substation facility would occupy approximately 2.6 acres in the northwest portion of the Project site. At the On-Site Substation, the voltage of the electricity would be stepped up to match that of the Southern California Edison (SCE) regional transmission grid. The power would be transmitted from the On-Site Substation to the CRSS through the overhead gen-tie line, which would be a maximum of 135 feet tall. The gen-tie line would run north from the On-Site Substation to the existing Corridor K/30-52 along 16th Avenue/Seeley Avenue. The line would then turn west and follow the existing Corridor K/30-52 approximately 2.79 miles to the SCE-operated CRSS, where it would interconnect to the CAISO grid. The gen-tie line would be included within a 160-foot wide corridor, and be approximately 2.79 miles long, for a total off-facility area of 54 acres.

The Project would also include Energy Storage Systems (ESSs), which are battery storage modules that would allow the facility to continue supplying energy to the grid for up to four hours in the evening after sundown, and would provide ancillary services to assist in providing stability. The ESSs would occupy approximately 15 total acres, and would include switchboards; integrated heating, ventilation, and air conditioning (HVAC) units built into the containers; inverters; transformers; and associated controls. Each standard 40-foot container can store up to 4 mega-watt hours (MWh) of energy. The units would be cooled by the HVAC units, which would use approximately two percent of the energy output. The energy use would not be offset by placing solar panels on top of the units, because of the limited roof area.

The batteries would be composed of lithium ion, sodium-sulphur, vanadium-redox-flow, or similar technology. The exact disposal method will depend on the technology chosen, but all batteries would be recycled or disposed in accordance with applicable Federal, state, and local regulations.

The ESSs would be AC-coupled, and situated in pre-fabricated metal containers located near the On-Site Substation. Each container would have an appropriate fire suppression system designed in compliance with Section 608 of the International Fire Code, as well as apron containment systems to prevent the escape of spills or leaks of fluids. The units would also be designed to comply with Article 480 of the electrical code, which specifies requirements for insulation and venting. The ESSs may be put on piers, which would likely not result in any major change in impervious area. If the ESSs are placed on pads, which would create up to 15 acres of impervious area, the final drainage design would be developed to accommodate the additional runoff.

2.3.3.3 Access Roads

Primary and secondary access roads are shown on Figure 2-2. Primary access to the solar facility would be from Exit 236 off of I-10. Traffic would follow S. Neighbours Boulevard (State Route [SR]-78) approximately one mile south to 16th Avenue/Seeley Avenue, and then west approximately 5 miles to the facility gate. This access uses existing roads.

Emergency access to the Project area would be from 22nd Avenue off of SR78. Emergency access from 22nd Avenue would be directly west to Gravel Pit Road. A new road, approximately 0.7 miles long, would be constructed to connect Gravel Pit Road to an entrance gate at the southern tip of the Project site.

For approximately 2.5 miles of its total length of 2.79 miles, the proposed gen-tie line would run parallel to, and approximately 150 feet south of, the gen-tie line for the McCoy Solar Energy

Project (MSEP). The existing road used to access the MSEP gen-tie line is 16th Avenue/Seeley Avenue, which runs parallel to, and north of, the MSEP gen-tie line. To use 16th Avenue/Seeley Avenue to access the DQSP gen-tie structure sites, a series of spur roads would be constructed. Each of these spur roads would be approximately 20 feet wide and 100 feet long, and would extend from 16th Avenue/Seeley Avenue north of the MSEP gen-tie line, pass underneath the MSEP gen-tie line, and provide access to the DQSP gen-tie structure locations on the south of the MSEP gen-tie line. Where the gen-tie line turns southwest to enter the CRSS, it would no longer be parallel to the MSEP gen-tie line and 16th Avenue/Seeley Avenue. Along this portion of the gen-tie line, a new access road parallel to the gen-tie line, approximately 20 feet wide and 1,750 feet long, would be constructed. The total length of access roads constructed for the gen-tie line would be approximately 4,000 feet.

Graded, graveled, or otherwise stabilized all-weather internal access roads would also be constructed at selected locations within the Project site. These roads would be required to facilitate transport of large Project components and materials from the staging areas to the construction work areas. Approximately 1.2 miles of existing on-site roads would be stabilized with gravel, and approximately 112.9 miles of additional internal roads would be constructed by compaction and/or stabilization of native soil material. Final placement of roads within the ROW would be identified in the approved POD. The gravel would be obtained locally to the extent practicable. These internal roads would continue to be used to access the facilities during Project operation and maintenance.

2.3.3.4 Operations and Maintenance Building

The O&M Building would be located adjacent to the On-Site Substation, in the northwest corner of the facility. The O&M Building would be used for parts storage, plant security systems, and monitoring equipment. The O&M Building would include offices, a restroom, and a storage area. The building would rest on a cement foundation, and would be approximately 120 feet by 50 feet in size. A small parking lot and additional storage containers would be located outside of the building. The building would receive backfeed power through the On-Site Substation, with long-term backup provided by a temporary diesel generator or electrical service line. An above-ground water tank would be located at the building, and would be used for drinking water and sanitary purposes. A septic system and leach field located at the O&M Building would serve as the sanitary waste system for Project operations.

2.3.3.5 Meteorological Facilities

The facility would include one or more meteorological stations and an associated data acquisition system (DAS), to collect data for analysis and system monitoring. The DAS would consist of a network of data loggers and programmable logic controllers at each PCS. The data loggers and controllers would be connected to a Wide Area Network and monitored in the O&M Building. Data would also be transmitted off-site, to a remote Network Operations Center.

The meteorological system may include an estimated nine anemometer towers installed around the site perimeter. The purpose of the anemometers would be to measure and communicate wind speed data to the facility control room, so that solar arrays on trackers could be re-positioned for safety in the event of high winds. The anemometer towers would range from approximately 20 to 30 feet high.

2.3.3.6 Power and Telecommunications Utilities

Hard-wired fiber-optic cable would be installed for telephone, internet, and other communications. Underground cables would be installed to connect the site to existing communications cables, located approximately one mile to the north. On the Project site, the communications system would connect to the temporary construction trailer area, the O&M Building, and the On-Site Substation. Alternatively, communications could be provided by microwave to the nearest available telecommunication site that connects to a local provider.

Power to support Project construction would be provided by generators or by an above-ground electrical service line installed along the same route as the underground communication line to an existing service line approximately one mile to the north. Power for operations (when the Project is not producing electricity) would be provided by backfeed power from SCE grid through the On-Site Substation. Long-term backup would be provided by a temporary diesel generator that would connect to a set of disconnects at the substation, or from the electrical service line installed during construction. A pad and a set of disconnects would be installed to facilitate rapid installation of the generator in the event of an emergency.

A separate communications line and a redundant communication system between the Project and the CRSS will be required by SCE. The separate system would be a fiber optic line attached to the Project gen-tie. The redundant system could be either a buried fiber optic line located in or adjacent to the gen-tie right-of-way, or a microwave system between the Project and the CRSS.

2.3.3.7 Security and Fencing

A guard shack would be located at the facility entrance gate. The shack would be manned by security personnel up to 24 hours per day throughout the construction period.

The perimeter of the solar facility, coinciding with the ROW boundary, would be fenced to provide security. The facility area included within the perimeter fence line would be approximately 3,714 acres. Fence posts for the perimeter fencing would be set into a concrete footing. In addition, the temporary construction staging areas near the O&M Building (i.e., construction move on area) would be separately surrounded by temporary security fencing. All fencing would be seven feet high, chain-link or wire fence and the upper one foot may be barbed wire. Where required, the base of the fence may include tortoise exclusionary fencing, anchored below the ground surface according to USFWS (2009) guidelines. Because the Project area is almost flat, the fences will not cross any defined surface water drainages. Gates in the fencing would be situated at roads entering or exiting the facility. Two gates off of 16th Avenue/Seeley Avenue would be installed as entrances to the temporary construction area on the northern perimeter of the facility. A gate would be installed off of 16th Avenue/Seeley Avenue at the O&M Building. A gate would be installed at the southern end of the facility, to provide access from Gravel Pit Road. There would be no external roads along the outside of the fence.

Site security would be provided 24 hours per day, 7 days per week, through a combination of the fencing, lighting, security patrols, and remote monitoring by electronic security systems. Surveillance systems such as security cameras, motion detectors, or heat sensors may be installed along the site perimeter.

2.3.3.8 Water Supply

The facility would require the use of water during both construction and operations. During construction, water would be used for fugitive dust control, soil compaction associated with site preparation and grading activities, sanitary purposes, and fire protection. The rate at which water would be used would depend on the timing and intensity of construction. The duration of Project construction is expected to be between 25 to 48 months. The shorter estimate would require more intensive water use, and therefore a higher rate of water use. The longer estimate would use water at a slower rate because less disturbance would occur at any given time compared to the shorter construction schedule, but would result in a greater amount of water use overall because the water use for dust control would be required for a longer period of time. The Applicant estimates that the 25-month construction timeframe would require a total of approximately 1,400 AF of water, or 700 AFY, and that a 48-month construction timeframe would require approximately 1,800 AF of water, or 450 AFY.

No water use is required for electricity generation during operations except for washing of solar panels. Water use would be required for sanitary purposes, fire protection, dust control, and vegetation management. No water would be used to irrigate landscaping. The Applicant estimates that operations would require up to 38 AFY, including 18 AFY for panel washing, and 20 AFY for other combined purposes. An aboveground process water/firewater storage tank would be located adjacent to the O&M Building, and would be supplied either with water piped from a proposed on-site well, or from trucks delivering from sources off-site. The size and dimensions of the tank would be determined based on Riverside County Fire Department requirements for firewater storage.

The Applicant plans to obtain water for construction from newly installed onsite wells. However, testing has not been done to verify if this is feasible. If onsite production is not feasible, then water would be transported to the site by truck. This PA/EIS/EIR analyzes the impacts of both options.

If onsite groundwater is used, as proposed, a well to support construction, operations, and decommissioning would be installed west of the O&M Building, and water would be piped through a water line to the above-ground storage tank. Water trucks would be filled at the above-ground tank, and would transport water for use at active construction locations. A second, temporary well, to be used only during construction, may be installed either along the southwest perimeter of the facility, or along the southeast perimeter.

An off-site water supply may be required as a temporary water source before a water supply well can be installed, or may be needed throughout the duration of construction if onsite production is not feasible. In the scenario where no well is installed and all water is delivered by truck, there would be an estimated 57,000 truck trips required for water delivery during construction. The source of this water would be the Palo Verde Irrigation District (PVID), which obtains water from the Colorado River through Priority 1 and Priority 3 rights pursuant to a 1933 Water Delivery contract with the United States. The water would be accessed from a pump station located along Neighbours Boulevard, just north of West 11th Street (URS 2016a). Acquiring this water from any other source, such as the PVID canals, would require a separate environmental analysis.

2.3.3.9 Sanitary Facilities

Sanitary needs during construction would be served by the use of portable toilets. Portable toilets would be serviced by licensed contractors, and waste would be regularly pumped and hauled to proper offsite disposal facilities.

During operations, sanitary needs would be supplied by a septic system and leach field located near the O&M Building. The volume of sanitary waste during operations is expected to be no more than a few hundred gallons per day. The onsite sanitary system would require construction and annual operating Onsite Wastewater Treatment System (OWTS) permits from the County. The Applicant would conduct soil percolation tests to verify that an on-site septic system and leach field is feasible at the proposed location. The specific location of the system would be determined based on the results of percolation tests.

2.3.4 Construction

2.3.4.1 Preconstruction Surveying and Staking

The first activities conducted as part of construction would be fencing of the construction area, wildlife clearance, and surveying and staking of facility locations.

Field topographic surveys would be conducted to obtain detailed topographic information, with one-foot interval accuracy, needed to support the final grading plan and stormwater management system. The surveys would be conducted using photogrammetry and field cross sections. The grading plan would be supplemented with a review of historical aerial photographs to determine changes in land use and stream channel configurations.

Prior to mobilizing heavy equipment, the construction work area would be fenced with tortoise exclusionary fencing. The exclusionary fence may be temporary in nature, or may be installed at the base of the perimeter security fence. Whether the tortoise exclusionary fence is temporary or long-term in nature, it will be designed and installed to match specifications contained in the USFWS (2009) guidelines. Once exclusion fence is established, biological surveys, clearance, relocation, and/or transplanting would be conducted, as determined necessary. These activities could include clearance surveys for Mojave desert tortoise and other sensitive species (e.g., Mojave fringe-toed lizard); translocation for Mojave desert tortoise; seasonal avoidance of nesting birds, including burrowing owls; passive relocation of burrowing owls, as necessary; and possible transplantation of sensitive plant species and species listed under the California Desert Native Plants Act.

Simultaneous with the field surveys, the locations of Project facilities would be surveyed and staked. Facilities to be staked would include the locations of internal roads; buried electrical lines; PV arrays; ROW and construction area boundaries; temporary work areas; areas to be graded or excavated; transmission structure centers; foundation structures; and offsets designated for protection of biological or cultural resources. A construction Stormwater Pollution Prevention Plan (SWPPP) would be developed, and would be used to develop the grading plan and any necessary stormwater management structures.

2.3.4.2 Temporary Construction Facilities

Several construction areas, some situated within the permanent ROW and others outside of the permanent ROW, would be developed to support construction activities. These areas would be used during construction for office trailers, temporary equipment laydown areas, pulling sites for the gen-tie line, and temporary access roads for construction sites. Once construction is completed, the areas situated within the permanent ROW would be converted to other uses to support operations. The areas situated outside of the permanent ROW would be restored.

Two staging areas to be used for support of construction of the solar arrays would be located on the northern site boundary, with a gated entrance off of 16th Avenue/Seeley Avenue. These areas, shown on Figure 2-2, would consist of a 28 acre laydown area, and a 15 acre Move-On Area for temporary construction trailers and parking. Temporary access roads located in this area would total approximately 4.5 acres. These areas, and the associated roads, are located outside of the permanent ROW, and would be restored upon completion of construction.

Construction of the gen-tie line would be supported by a temporary office trailer, gen-tie structure sites, spur roads, pulling sites, and laydown area. Most of these areas would be situated within the 160 foot wide permanent gen-tie ROW. However, construction activities would require an area larger than the permanent ROW, so portions of these areas would only be used temporarily during construction. The acreages of the temporary construction areas outside of the permanent ROW are summarized in Table 2-4. The total area of temporary construction areas outside of the perimeter ROW, including 47.5 acres for the staging areas and roads near the facility entrance and 13.8 acres associated with gen-tie line construction, would be approximately 61 acres.

Two construction areas located on the southwestern and southeastern Project boundaries would be included within the perimeter fence and would remain part of the ROW after construction. These two areas, comprising 28 acres, would be used as equipment laydown and assembly areas.

All staging areas would be un-paved and un-graveled, but would be treated with dust palliative and water as necessary to control dust. One or more temporary water storage ponds or tanks would be utilized during construction. Hazardous materials storage for construction would be located in one of the temporary laydown areas. Stormwater management features for protecting the staging areas from stormwater damage would be included within the construction SWPPP.

Construction materials would be stored in the staging areas in uncovered rows, grouped according to the type of material: steel piles, PV modules, table frames, tilt brackets, hardware, electrical cables, and other categories. Electrical equipment, such as transformers, PVCs, and PCs, would not be shipped until they are ready to install, so would not be stored in the staging areas. Aggregate for road construction and foundations would be delivered to the site at a rate proportional to its use, so would not require substantial storage areas.

2.3.4.3 Site Preparation

Operation of the solar panels, safe and effective movement of workers and materials throughout the site during construction, and management of stormwater would require site preparation to remove vegetation, and create a flat and compacted surface. Soil would be compacted to a level that allows delivery trucks, pile driving equipment, and cranes to move across the site. After grading and underground work, most areas would be compacted to approximately 85 percent of its maximum dry density. The exact locations to be prepared, and techniques to be used for site

preparation, would be determined in a final site grading plan following the pre-construction surveys and included in the approved POD prior to actual ground disturbance and issuance of a Notice to Proceed by the authorized officer.

The preferred methods for site preparation would be either mowing or a disk contour grade and roll method and compaction of vegetation throughout most of the Project site. These methods would be used for approximately 88 percent of the Project area. These methods are preferred because they would leave topsoil and vegetative matter in place. Where feasible to use these methods, vegetation would be mowed or disked under, mulched or composted, and retained on-site to assist in erosion control and to limit waste disposal. Plant root systems would be left in place, to the maximum extent practicable, to provide soil stability.

Mowing and disk and roll site preparation would be performed using conventional farming equipment including tractors with mowing or disking equipment and vibratory rollers. In the disk and roll method, rubber-tired tractors would tow disk harrow equipment to treat the top 5 to 7 inches of soil. Each tractor would be followed by a water truck, which would use water to keep fugitive dust emissions to acceptable levels. The disk would incorporate the roots, topsoil nutrients, and seed bank into the soil. Following disking, a drum roller would be used to flatten the surface and return the soil to a compaction level similar to the preconstruction stage. In some areas, there may be limited use of scrapers to perform grading to reduce mounds greater than six inches in height. This technique would leave the macro-level topography and stormwater drainage unchanged, but would produce a level surface needed for worker safety.

A topographic map of the Project area is shown in Figure 2-7, and a more detailed view of the Project site is shown in Figure 2-8. Figure 2-8 shows the areas where cut and fill would be used in limited areas to maintain a consistent grade throughout the Project site. The cut and fill methods would be used for approximately 12 percent of the Project area. Areas which would be occupied by structures, including the O&M Building, On-Site Substation, access roads, PCS and PVCS vault areas, temporary construction area, and anemometer towers, would be graded and compacted to meet engineering specifications for those facilities. The Applicant's preliminary grading plan indicates that cut and fill depths can be minimized, and no import or export of soil material would be required, as the amount of cut and fill would be balanced on-site.

Topsoil removed through grading in these areas would be stockpiled and used for post-construction reclamation of temporarily-disturbed areas, or for balancing cut-and-fill needs throughout the Project area. Vegetation in cut and fill areas, roadways, locations of concrete foundations, and locations of stormwater management structures would be removed, after necessary permits for removing desert vegetation are obtained from the County of Riverside, as required by the California Desert Native Plants Act. Vegetation from these areas would be mulched and redistributed within the construction area for soil stabilization. Cut and fill grading would be timed to minimize the duration in which open, uncovered ground would be exposed, and thereby minimize dust and erosion issues.

Concrete would be used to construct foundations for the On-Site Substation equipment, the O&M Building, fence footings, and transmission structure footings. Concrete pads, foundations, and vaults may include both pre-cast and poured-in-place construction methods. Concrete would be obtained from local sources, as much as practicable, and the Applicant does not propose construction of an onsite cement plant.

2.3.4.4 Assembly and Installation of Solar Arrays

Assembly and construction of solar arrays would be completed in two stages. The specific sequence of construction within the Project site would be developed during final Project design.

The first step of construction following site preparation in each area would be the digging of trenches and installation of underground AC and/or DC cables to a depth of three feet. The underground DC cables would connect each row of panels with the PCS, and the underground AC cables would connect the PCSs and transformers to the PVCSs. Alternatively, these facilities may be connected through above-ground cables approximately 1 to 4 feet off of the ground. At the same time, cement foundations for the inverter enclosures and transformers would be prepared. If DC converters are utilized, there would be no PCS, rather DC cables would be placed underground or above ground to the converters. The trenched areas would be backfilled once the cables are buried, and the previous contours would be restored. Although the construction area would be surrounded with Mojave desert tortoise exclusion fence, the trenches would be excavated with slope inclines at various intervals in order to allow egress and prevent entrapment of wildlife.

Following installation of cables in an area, the next step would be to install the vertical support posts for the mounting system for the solar panels. The posts would be driven using small, tracked-vehicle-mounted post drivers. The module frames would then be attached to the posts using prefabricated tilt brackets, and the PV panels would be attached to the frames using brackets. The PV modules and module framing assemblies would be delivered to the construction staging area in containers on tractor-trailers. The PV modules and the assemblies would be lifted from the tractor-trailers and placed adjacent to the array locations. Wire harnesses, held to the panels by brackets, would connect the PV modules to the electrical collection system.

2.3.4.5 Power Distribution

The PCS enclosures would be pre-fabricated and delivered to the site. They would be installed on cement vaults, foundations, or piers within each block, and would be connected to incoming power lines from the combiner boxes. DC converters on concrete bases may be installed rather than utilizing PCSs. The modules would use standard touch-safe wiring connectors, and workers would walk behind each row and plug the wires from each module into the wiring harness, and then the wiring harnesses into a combiner box. The combiner boxes would then be connected to the DC cables that lead to the PCS enclosure and transformer. The transformers would then be connected to the AC cables which lead to each PVCS. From the PVCS, power would then be transferred by overhead lines to the On-Site Substation. The On-Site Substation would step the power up for transmission to the CRSS through the gen-tie line.

All electrical work would be conducted by certified electricians. Utility journeymen would perform or supervise the high-voltage electrical work for the On-Site Substation and gen-tie line.

The overhead power lines from the PVCS to the On-Site Substation, and for the gen-tie line, would be strung overhead on the supporting transmission structures. Heights of structures would vary depending on the electrical clearances required, but would be lower than 70 feet for the on-site overhead lines and 135 feet for the gen-tie line.

2.3.4.6 Gen-Tie Line

The ROW and structure locations for the gen-tie line would be surveyed and marked during preconstruction surveying. A laydown yard for materials required for the gen-tie line would be developed within the Project area. Access roads, including a road for gen-tie line maintenance and temporary roads for access for construction vehicles, would be cleared and graded. Temporary sites for pulling and tensioning would be developed by grading a level area. Specific locations for puller and tensioning sites would be developed following detailed design of the gen-tie line. These locations may lie outside of the 160 foot wide ROW, but would be located within the 600-foot wide gen-tie study area used to determine the proposed routing for the gen-tie line corridor, authorized through a short-term right-of-way for construction, and identified clearly in the approved POD prior to issuance of a Notice to Proceed. Temporary work areas would also be mapped for reference and established around each transmission structure, to enable pole assembly and erection.

Long-term disturbance would be limited to areas within the 160-foot-wide ROW corridor, but temporary disturbance for the puller and tensioning sites may occur outside of the ROW. Some disturbance has been assumed for the entire 160-foot wide ROW, but once any construction areas to enable pole assembly and erection have been restored, would physically consist only of the 20-foot wide access spur roads and footprint of each transmission tower. A short-term ROW would be obtained to authorize temporary puller and tensioner sites.

Following site preparation, foundations would be installed at each transmission structure location. The exact type of foundation would vary, depending on the type of structure developed in the final design. Foundations may include drilled-shaft anchor-bolted foundations, drilled-shaft embedded foundations, or vibrated steel casings.

The transmission structures for the gen-tie line would be delivered to the laydown yard for storage, and then transferred from the laydown yard to their installation location as needed. The structures would be assembled in sections on cribbing that provides for the proper alignment of the steel members. Steel sections would be laid out with hydraulic cranes. The pole base and top sections would be assembled at each structure site. Insulators and hardware may be placed on the structure prior to its erection.

The gen-tie line structures would be constructed of tubular steel monopoles. A crane would be used to set the pole base sections onto each foundation. An electrical grounding crew would then install the grounding, and test the ground resistance. The structures would be no higher than 135 feet.

The cable for the gen-tie line would be strung using conventional wire stringing using tension stringing equipment. The wires would be sagged in accordance with specified sagging data, corrections, and offsets. The wires would be dead-ended on the dead-end structures and clipped-in on the tangent and angle structures.

2.3.4.7 Construction Schedule

The Applicant would construct the solar facility and gen-tie line simultaneously, over a 25- to 48-month period. Construction is expected to typically occur from 7:00 a.m. to 5:00 p.m., Monday through Friday. However, work in the early morning, evening, or nights and on weekends during certain construction phases may be necessary. The work schedule may also be modified to account

for weather conditions during the year, such as starting the workday earlier in the summer months to avoid work during the hottest part of the day for health and safety reasons. In addition, for safety reasons, certain construction tasks, including final electrical terminations, must be performed after dark when no energy is being produced. Any nighttime work would be conducted using restricted, task-specific lighting, as needed in order to provide a safe workplace. Lights would be focused downward, shielded, and directed toward the interior of the site to minimize light exposure to areas outside the construction area. Construction work taking place outside of typical hours would comply with Riverside County standards for construction noise levels.

2.3.4.8 Construction Equipment and Workforce

The Applicant estimates that the construction workforce would average approximately 450 employees over the construction period, and would have a peak workforce of approximately 810 employees, resulting in an estimated 1,620 daily commuting trips. The construction workforce would be recruited from within Riverside County and elsewhere in the surrounding region to the maximum extent practicable. Construction would also involve an estimated 300 daily trips by 50 vehicles to deliver materials to the Project site.

The majority of the construction equipment and vehicles would be brought to the construction site at the beginning of the construction process, and would remain on-site throughout the duration of the construction activities. Transport and delivery of equipment and materials would be done in accordance with a traffic monitoring and control plan, as described in Section 4.17.2, to minimize short-term impacts associated with temporary use of the roads. Equipment would generally not be driven on public roads while in use for the Project. Traffic on public roads would include construction worker commuting vehicles, periodic truck deliveries of materials and supplies, and periodic truck removal of recyclables and wastes. A total of approximately 14,400 truck deliveries of materials are anticipated throughout the construction period for the Proposed Action and Alternative 2, and approximately 10,800 truck deliveries would be required for Alternative 3.

In addition to truck deliveries of materials, truck deliveries of water for construction may be used. Although groundwater from on-site wells is the anticipated source for construction water needs, in the event an on-site source is not available, it may be necessary to truck water from an off-site source. If trucking water is required for the entire 25 month construction period, up to approximately 57,000 water truck deliveries (assuming 8,000 gallon capacity water trucks) could potentially be required. The Applicant would schedule truck deliveries and shipments to avoid the peak traffic hours in the morning and evening. Materials would generally be delivered within approximately two weeks prior to its use, except for electrical systems (PCSs and PVCSs), which would be received just prior to installation.

2.3.4.9 Construction Hazardous Materials and Wastes

As shown in Table 2-2, chemicals used onsite during construction are primarily fuels and lubricants associated with motorized vehicles and equipment, solvents and adhesives used for assembly of solar modules, and soil stabilizers to be used for dust control. Procedures to be used for management of hazardous materials used onsite during construction are discussed in Section 2.3.7.1.

Table 2-2. Non-Semiconductor Chemicals at Project Site During Construction

Product	Use
Diesel Fuel	Vehicles
Gasoline	Vehicles
Motor Oil	Vehicles
Hydraulic Fluids and Lube Oils	Vehicles and Equipment
Solvents and Adhesives	PV Module Assembly
Soil Stabilizers	Roads and PV Table Areas

Diesel and gasoline fuel storage during construction is estimated to be approximately 2,500 gallons each; storage will include refueling tanks, generators, portable light stands, and other small stationary containers.

Wastes generated during construction of the Project would include broken PV modules, wood, concrete, and miscellaneous packaging materials. A summary of the expected solid wastestreams, volumes, and expected recycling or disposal, for construction is presented in Table 2-3. The proposed methods for managing sanitary wastes during construction are discussed in Section 2.3.3.9. Procedures to be used for management and disposal of other wastes during construction are discussed in Section 2.3.7.1. The potential for releases of hazardous materials, and the risks associated with potential releases, are discussed in Section 4.9.3.

Table 2-3. Generation and Disposal of Solid Wastes Associated with Construction

Waste	Origin	Composition	Estimated Quantity ¹	Classification	Disposal
Scrap wood, steel, glass, plastic, paper	Construction activities	Normal refuse	1,200 tons (14,160 cubic yards) ¹	Nonhazardous	Recycle and/or dispose of in industrial or municipal landfill
Scrap metals	Construction activities	Parts, containers ²	<12 tons (<168 cubic yards)	Nonhazardous	Recycle and/or dispose of in industrial or municipal landfill
Waste oil filters	Construction equipment and vehicles	Solids	3,000 lbs.	Used Oil	Recycle at a permitted Treatment, Storage, and Disposal Facility (TSDF)
Oily rags, oil sorbent excluding lube oil flushes	Cleanup of small spills	Hydrocarbons	600 cubic ft.	Used Oil	Recycle or dispose at a permitted TSDF
Spent lead acid batteries	Construction machinery	Heavy metals	60	Hazardous	Recycle or dispose offsite at a Universal Waste Destination Facility

Table 2-3. Generation and Disposal of Solid Wastes Associated with Construction

Waste	Origin	Composition	Estimated Quantity ¹	Classification	Disposal
Spent alkaline batteries	Equipment	Metals	300 lbs.	Universal waste solids	Recycle or dispose offsite at a Universal Waste Destination Facility
Waste oil	Equipment, vehicles	Hydrocarbons	3,000 gallons	Used Oil	Dispose at a permitted TSDF
Sanitary waste	Portable toilet holding tanks	Solids and liquids	1,200,000 gallons	Nonhazardous liquid	Remove by contracted sanitary service

Notes:

1 – Quantities were provided by Applicant in the form of tons per 150 MW phase of construction. Those quantities have been multiplied by 3X to estimate the total quantity associated with construction of the 450 MW Project, and then converted from tons to cubic yards using the conversion factor for wood construction debris (11.8 cubic yards/ton) and scrap metal (14.0 cubic yards/ton) in EPA 2016a.

2 - Containers include <5-gallon containers and 55-gallon drums or totes

2.3.5 Operations and Maintenance

Operations and maintenance of the solar facility and gen-tie line require minimal activities on the part of the operator. The facility operates passively, with no fuels, no thermal cycle, and no need for water use for electricity generation except for washing of solar panels. No water would be used to irrigate landscaping. The primary operational activities would be maintaining the solar panels, electrical systems, and gen-tie line; providing security; and maintaining access for maintenance and security.

The access roads and aisles between rows of solar panels would require occasional vegetation management and correction of minor erosional features or ruts caused by vehicle use. The Project areas covered by solar modules allow vegetation to grow. Dust would be washed from solar panels up to twice per year.

The workforce to perform for operations, maintenance, and site security purposes is estimated to be up to 5 full time workers. Workers are expected to operate in two 12-hour shifts. The workforce would generate up to 5 round-trips for commuting each day. During operations, potable water for drinking and sanitary purposes would either be trucked into the site from Blythe, or would be supplied by an onsite groundwater well.

Operations and maintenance would require occasional delivery of materials for replacement of solar panels and electrical equipment. Up to 10 delivery trucks per day may be required, when such replacements are scheduled.

Further maintenance is also required to assure soil stabilization and vegetation restoration of temporary disturbance sites. These sites would be restored using methods defined in the Restoration section of the Vegetation Resources Management Plan.

During operation, the only hazardous materials used onsite would be fuels and lubricants for vehicles, emergency generators, and other equipment. Procedures to be used for management of hazardous materials used onsite during operations are discussed in Section 2.3.7.1. The potential for releases of hazardous materials, and the risks associated with potential releases, are discussed in Section 4.9.3.

Electrical generating activities would not produce hazardous or other industrial waste. The Applicant would use transformers that contain biodegradable oil, rather than mineral oil. Wastes generated during operations would include broken solar panels, spent batteries, office-related refuse generated by workers, and wind-blown debris caught against the perimeter fence or between panels. If hazardous materials are released from their containers and/or containment areas during their storage or use, contaminated soil would be generated as a result of response or remediation activities. The proposed methods for managing sanitary wastes during operations are discussed in Section 2.3.3.9. Procedures to be used for management and disposal of other wastes during operations are discussed in Section 2.3.7.1.

2.3.6 Decommissioning

If the ROW grant is not renewed beyond the 30-year operational period, or the Project ceases for other reasons, the ROW grantholder would be responsible for removal of the Project facilities and restoration of the public land through decommissioning. The Applicant has developed a Draft Decommissioning and Site Reclamation Plan (Desert Quartzite 2015) which describes the general outlines of the proposed activities. The Plan, re-titled as Draft Decommissioning and Site Restoration Plan would be updated and finalized prior to decommissioning to ensure that the Project area would be restored according to applicable regulations and site conditions in effect at that time.

Prior to decommissioning, preparation activities would occur. A Phase I Environmental Site Assessment would be conducted to document existing conditions, including the potential presence of hazardous materials or conditions. All hazardous materials would be removed from the site before structures are removed. Containers for hazardous materials and petroleum fuels would be rinsed clean, when feasible, and the waste liquid collected for off-site disposal. Phase II environmental sampling and, if needed, remediation would occur in areas where hazardous materials were stored, and in any areas where releases during construction or operations were documented. The leach field would be removed, and the area sampled to identify and address any remaining contamination. Prior to beginning decommissioning, a decommissioning SWPPP would be developed and implemented, to decrease the potential for release of contaminants to the environment and contact with stormwater.

Decommissioning would include removal of all aboveground and near-ground facilities, including the PV arrays and supporting electrical and facility systems. The PCSs, PVCS cabinets, gen-tie line, and On-Site Substation would be de-energized, dismantled, and removed in accordance with all Federal, state, and local regulatory requirements. Some structures would be removed only to a depth sufficient to allow site restoration, as has been authorized by BLM on similar projects. Concrete foundations would be removed to a depth of three feet. The underground cables that

comprise the DC power collection system would be cut off and left in place at a depth of three feet. Poles associated with the 12 kV distribution line would be removed to a depth of three feet. The plan for decommissioning the facilities, including the O&M Building, parking areas, water storage tank, access roads, fencing, lighting, gen-tie line, and related infrastructure would depend on the planned future use of the site. If a reuse proposal for the site is received prior to decommissioning, some items may be left in place for use by that development. However, the approved decommissioning plan would assume such a proposal does not exist and would encompass removal of all Project facilities and restoration of the public land to pre-application conditions.

Once removed during decommissioning, all equipment and infrastructure would be recycled or resold as practicable, or disposed of in compliance with applicable laws. Removed materials and debris would be broken down into pieces of a manageable size onsite, so that they can be safely transported offsite. Most of the Project facilities would be composed of materials that can be recycled, including glass, semiconductor material, aluminum, steel, and wiring. Project materials to be removed from the site and recycled or resold include the steel tables and posts, wiring, and PV modules themselves. PV modules and other products used during construction and operation of the Project are generally not hazardous and are not subject to Federal or state hazardous material management regulations. If used, CdTe PV modules are currently characterized as Federal non-hazardous waste, but may be characterized as a California-only hazardous waste.

If no other uses are planned, the site would be restored to mimic the original pre-application topography. The Project area soil and vegetation would be restored to their preconstruction condition or analog condition to reflect climate change, with native vegetation similar to plants in the surrounding vicinity or as approved by the authorized officer. Upon removal of the infrastructure, the disturbed soil would be stabilized using erosion control Best Management Practices (BMPs) until final measures for restoring ecosystem functions can be implemented. Topsoil, brush, rocks, and natural debris would be distributed so that the site visually blends in with the surrounding landscape, and to facilitate re-vegetation. Compacted soils would be de-compacted. Restoration would include a combination of natural regeneration, mechanical re-seeding, planting of nursery stock, and transplanting local vegetation. Soil disturbance by mechanical means would be minimized to prevent invasions of non-native plant species and to maintain soil fertility.

Following decommissioning, monitoring would be conducted to verify whether restoration is successful or additional interventions for restoration are warranted. Reference sites would be established to allow comparison of the re-vegetation effort with adjacent undisturbed sites. Success standards, including metrics, would be established. Monitoring would be conducted using line and belt transects and quadrat or circular plot techniques. Results would be reported to the applicable agencies for review to determine if restoration was achieved as determined by the BLM Authorized Officer.

Decommissioning is expected to take up to a year to complete. The types of equipment, workforce, and traffic associated with decommissioning are expected to be similar to those used for construction. Monitoring will begin at the end of decommissioning, and is expected to continue for one to three years, or until the site meets success criteria.

2.3.7 Applicant-Proposed Management Plans and Mitigation Measures

The Applicant has proposed a variety of management procedures and mitigation measures, to be implemented during construction, operations, and decommissioning, to ensure compliance with all permit conditions, avoidance of environmental impacts where possible, and mitigation, reduction, and/or compensation for environmental impacts where avoidance is not possible. These measures are discussed, with respect to each applicable resource, within the resource sections of Chapter 4.

Prior to construction, the Applicant would develop and implement an Environmental Inspection and Compliance Monitoring Program, that would provide an over-arching program covering all environmental resources, permits, and mitigation measures. A qualified individual would be assigned to serve as the Project's Environmental Manager, with responsibility for implementation of the program. The Environmental Manager would be responsible for:

- Development and implementation of the overall Project compliance program;
- Communication and coordination with the applicable regulatory agencies;
- Ensuring compliance with the APMs, agency-required mitigation measures, and various conditions and requirements of permits and approvals;
- Record keeping and reporting required by permits and approvals;
- Ensuring that all applicable environmental plans are up to date;
- Advising management of actual and potential compliance issues; and
- Ensuring that Project planning takes appropriate account of compliance issues in advance.

2.3.7.1 Hazardous Materials and Waste Management

The Applicant's procedures for management of wastes, handling of hazardous materials, prevention of releases of hazardous materials, and plans for responding to emergencies would be specified in a variety of permits and plans required by various agencies. The Applicant has developed a Preliminary Hazardous Materials Management and Emergency Response Plan, which describes the issues to be addressed in a completed Plan prior to the beginning of construction. The completed Plan would specify BMPs, including storage, management, and disposal procedures, to be used during construction, operations, and decommissioning. BMPs to be implemented as part of the completed Plan would include:

- Keep materials in their original containers with the original manufacturer's label and resealed when possible;
- Avoid storage of excessive quantities of chemicals by procuring and storing only the amounts needed;
- Store hazardous materials in secondary containment, including associated inspection and maintenance procedures to ensure proper function of the secondary containment;
- Follow manufacturer's recommendation for proper handling and disposal;
- Conduct routine inspections to ensure that all chemicals on-site are being stored, used, and disposed of appropriately;

- Perform timely maintenance on vehicles/equipment that are leaking oil or other fluids, and place drip pans under the leak when the vehicle/equipment is parked prior to the maintenance event;
- Encourage mobile refueling of vehicles onsite to minimize stationary tank storage of fuel and other hazardous materials;
- Ensure that no hazardous materials, chemicals, fuels, or lubricating oils would be stored within 100 feet of any wetland, water body, or water supply well, or within any designated municipal watershed;
- Refuel all construction equipment at least 100 feet from any water body, water well or wetland;
- Ensure that all personnel dealing with hazardous materials are properly trained in the use and disposal of these materials in accordance with local, state and Federal regulations;
- Maintain Material Safety Data Sheets available on the site for use during Project construction and operation; and
- Notification and response actions to be taken in the case of discovery of unanticipated hazardous materials.

Chemicals would be stored in appropriate containers, in an enclosed and secured location such as portable outdoor hazardous materials storage cabinets equipped with secondary containment to prevent contact with rainwater. During construction, chemical storage cabinets may be moved to different locations throughout the site, to provide workers access to the chemicals as the location of work activities moves. Chemical storage areas would be designed to not be located immediately adjacent to any drainage, and protection of the locations from stormwater damage would be evaluated within the construction SWPPP. Waste lubricating oil would be recovered and recycled by a waste oil recycling contractor. Bulk chemicals are not expected to be used on-site, with most materials being stored in small-volume, returnable delivery containers. All chemical storage areas would be designed to contain the spread of leaks and spills within containment areas.

The Preliminary Hazardous Materials Management and Emergency Response Plan also summarizes planning and response procedures for fire, spill, and explosion emergencies. The completed Plan would specify employee roles and responsibilities for hazardous materials management, waste management, and emergency response; emergency response and communication procedures; and requirements for posting emergency information and training employees.

The Applicant has developed a preliminary summary of a construction SWPPP, which would be developed and implemented prior to Project construction. In addition to stormwater control procedures discussed in Section 2.3.7.9, the SWPPP would include requirements for hazardous materials storage and handling in order to protect water quality. These would include prohibiting the storage of hazardous materials or re-fueling of vehicles within 100 feet of a wetland, water body, or water supply well.

As specified in the Preliminary Hazardous Materials Management and Emergency Response Plan, the Applicant would avoid storage of excessive quantities of chemicals by procuring and storing only the amounts needed. Therefore, the amount of each hazardous material present onsite at any given time is expected to be limited.

The Applicant proposes to store up to 2,500 gallons each of diesel and gasoline during construction, which exceeds 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, or extremely hazardous substances above the threshold planning quantity. As a result, the Applicant would develop and implement a Hazardous Materials Business Plan (HMBP) in coordination with Riverside County Department of Environmental Health and County fire officials. In addition, because the Project would involve onsite storage of more than 1,320 gallons of oil or oil products, the Applicant would develop and implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan. The Applicant has developed a summary outline of an SPCC Plan, which describes the issues that would be addressed in a completed Plan. Issues to be addressed would include a diagram showing the facility and locations of oil storage, description of the type of oil, methods used to prevent and control releases, and requirements for inspections, testing, employee training, and reporting. Appropriately sized and supplied spill containment kits would be maintained onsite in the area of the O&M Building, and operations employees would be trained on the appropriate spill prevention, response, and containment procedures.

The completed Hazardous Materials Management and Emergency Response Plan would identify expected wastestreams; specify how waste would be sampled, analyzed, and characterized; and specify potential waste disposal locations for different categories of wastes. Elements of the Plan relevant to waste management would include waste determination procedures, waste disposal locations, container management, inspection requirements, preparedness and prevention requirements, and requirements for packaging, placarding, manifests, and record-keeping and reporting. Disposal of any excess materials and wastes would be performed in accordance with local, state and Federal regulations, and any excess materials or waste would be recycled or reused to the maximum extent practicable. Any equipment broken or requiring replacement would be removed offsite for recycling or disposal.

PV modules damaged during construction, operations, or removed at the end of the Project life would either be recycled, or would be disposed of in accordance with local, state, and Federal regulations. The disposal would depend on the specific semi-conducting material used in the solar panels. Some materials, such as CdTe PV modules, may be regulated as a California-state hazardous waste.

The batteries in the ESS units would be regulated as hazardous waste under Title 22, California Code of Regulations §§ 66273.9 and 66273.2. The disposal of the batteries would be managed under a Hazardous Materials Business Plan, either a new plan developed with the Certified Unified Program Agency, or through an existing plan.

2.3.7.2 Vegetation Management

The Applicant and the BLM would jointly develop a Vegetation Resources Management Plan (VRMP) to be implemented at the Project site. The VRMP would be developed in coordination with and approval by Riverside County and the BLM to determine the best methods and species to employ. The Plan would include identification of special-status plant species that could be impacted by Project activities; any required mitigation for special-status plants; and proposed methods for reclamation of temporarily disturbed areas with native species. The Applicant has conducted focused surveys for special status plant species, and the results of those surveys have been used to develop Project alternatives that would avoid, to the maximum extent practicable, impacts to special status plant species.

The Applicant has developed a Draft Integrated Weed Management Plan (IWMP; provided in Appendix J), which would be a component of the VRMP, to control invasive and exotic weeds. The IWMP was developed in accordance with BLM's Vegetation Treatments Using Herbicides Final EIS (2007) and Final Programmatic EIS for Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfon on Bureau of Land Management Lands in 17 Western States (BLM 2016), and the Applicant would acquire and comply with any required permits for the use of herbicides or pesticides. The Plan would be finalized with the assistance of plant ecologists on staff and/or engaged by the BLM, as described in Applicant-Proposed Measure (APM) BIO-5.

The final plan would also address prescriptions for temporarily disturbed sites, including the possibility of allowing BLM access to these areas to test new and emerging strategies and management practices for improvement in reestablishing native vegetation. Experimentation in these areas would be allowed so long as they do not conflict with facility operation.

2.3.7.3 Fire Prevention and Control

The Project area has limited potential for wildfire. The area is sparsely vegetated, and vegetation onsite would be salvaged if required or otherwise crushed or removed through mowing or disking during Project construction. The Project is not located adjacent to wild lands with a high fire potential.

The Applicant would coordinate with Riverside County to ensure that appropriate measures are implemented to control the risk of fire. An aboveground water storage tank may be maintained adjacent to the O&M Building, and may be sized to meet Riverside County Fire Department requirements, as applicable, to supply sufficient fire suppression water during operations. Additional fire protection measures would include sprinkler systems in the O&M Building; a FM200 fire suppression system, or equivalent, in the facility control room at the O&M building; and portable carbon dioxide (CO₂) fire extinguishers mounted at the power conversion system units. All Project facilities would be designed, constructed, and operated in accordance with applicable fire protection and other environmental, health and safety requirements.

Fire prevention and response would be addressed in the Hazardous Materials Management and Emergency Response Plan for construction and operation. The plan would comply with applicable Riverside County regulations, and would be coordinated with the Riverside County Fire Department and BLM.

During construction, electrical equipment would only be energized after the necessary inspection and approval, so there is minimal risk of any electrical fire. Workers would monitor fire risks during both construction and operation, to ensure that prompt measures are taken to mitigate identified risks. In addition, transformers located on-site would be equipped with coolant that is non-flammable, biodegradable, and contains no polychlorinated biphenyls or other toxic compounds. The network of access roads would be developed to ensure that there is adequate access for fire control and emergency vehicles to the site.

2.3.7.4 Health and Safety

The Applicant would develop and implement an Environmental Health and Safety Plan to ensure that all construction and operations activities are safe, and comply with all local, state and Federal regulatory requirements. The plan would be based on existing plans for similar solar facilities

operated by the Applicant, but would be customized specifically for the Project, based on location, scope and hazards. The Project would comply with all Occupational Safety and Health Administration (OSHA) and California OSHA (CalOSHA) requirements in construction and operation. Illness and Injury Prevention Programs would also be developed and implemented for both construction and operation.

All subcontractors performing work onsite would be screened to review their safety performance. All contractors would be required to participate in safety orientation, to make them aware of all Project safety hazards and requirements and procedures. Daily tailgate safety meetings would be held to discuss site conditions, the planned daily tasks, and any potential hazards.

2.3.7.5 Wildlife

The Applicant would develop and implement a variety of management plans and procedures for protection and mitigation of impacts to wildlife. The plans are required under a variety of Federal and state environmental regulations, including the Federal Endangered Species Act (ESA), California Endangered Species Act (CESA), Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, and both BLM and County requirements.

A Bird and Bat Conservation Strategy (BBCS) would be developed to describe measures to protect sensitive bird and bat species. Unavoidable impacts to burrowing owls would be mitigated in consultation with CDFW, and in compliance with the latest CDFW and California Burrowing Owl Consortium guidelines. Due to potential for electrocution, collision, and nesting/perching by migratory birds on overhead power lines, the Applicant proposes to follow APLIC guidelines specified in Suggested Practices for Avian Protection on Power Lines (APLIC 2006). Additional information that would be used in Project design is provided in Reducing Avian Collisions with Power Lines (APLIC 2012).

Additional plans to be developed include:

- Mojave Desert Tortoise Mitigation and Translocation Plans;
- Predator Management Plan;
- Desert Kit Fox and Badger Management Plan; and
- Couch's Spadefoot Toad Protection and Mitigation Plan.

Prior to construction, the requirements of all of the management plans and mitigation measures associated with wildlife protection would be incorporated into a Worker Environmental Awareness Program (WEAP). The Applicant has developed a preliminary summary of the WEAP, which would be completed and implemented prior to construction. This program would include training and communication mechanisms to educate all site workers regarding the requirements for general housekeeping, hazardous materials and waste handling, spill reporting and response, unanticipated discoveries of cultural resources, and measures to identify and protect biological resources. The WEAP measures applicable to biological resources would include flagging or staking of protected areas; instructions to not feed, kill, or harass wildlife; and requirements for reporting injured or dead animals.

The Applicant would adopt and implement the general mitigation measures for the Mojave desert tortoise, as set forth in the *Desert Tortoise Mitigation Measures* for the CDCA Plan as amended by the Northern and Eastern Colorado Desert Coordinated Management (NECO) Plan and

subsequent amendments. A Mojave desert tortoise mitigation plan and a translocation plan would be developed in consultation with BLM, USFWS, and CDFW. The measures are expected to include mitigation measures and habitat compensation ratios that are proportional to and consistent with the quality of habitat and management status associated with the Project area.

Prior to construction, a pre-construction clearance survey would be conducted to determine how many tortoises, if any, occupy the Project area. If any tortoises are located during the survey, the Applicant would consult with the USFWS to confirm the result, and in accordance with an approved Desert Tortoise Translocation Plan, present a plan for translocating tortoises to an off-site location (if more than five tortoises are discovered in the Project area) or relocating tortoises to a near-site location (if between one and five tortoises are discovered in the Project area). The Applicant would then initiate a clearance survey to capture tortoises for translocation/relocation, affix radio transmitters, and perform protocol health assessments to facilitate monitoring of their movements and health status following translocation/relocation. The translocation/relocation of tortoises from the Project area would be conducted in accordance with USFWS (2009, 2011, 2013) protocols.

2.3.7.6 Air Quality

Prior to issuance of the Notice to Proceed, the Applicant would prepare and implement a Phased Site Preparation Plan, which would include a finalized Dust Control and Soil Stabilization Plan. The Applicant has developed a preliminary summary of a Dust Control Plan to control fugitive dust emissions during Project construction. The Dust Control Plan would be designed to minimize water use and dust emissions through optimal site preparation techniques. The Plan would take into consideration surface disturbance and construction schedule, seasonal winds, site specific wind patterns, soil properties, and soil disturbances to ensure adequate measures are implemented to manage fugitive dust. The construction schedule would minimize the size of open areas of disturbance requiring stabilization and maintain existing vegetation, where feasible. The Plan would:

- Identify a comprehensive construction schedule for the entire Project site. When feasible, surface disturbance would be minimized to those areas necessary for project access and installation of solar panels and other infrastructure associated with the solar facility.
- Identify all measures being undertaken during construction activities and operational activities to ensure fugitive dust being blown offsite is minimized. Measures may include, but are not limited to use of water trucks as required for the expected level of winds in the area, and use of dust suppressant (i.e., soil binders or mulch), as necessary.

The Plan would include requirements such as use of water or dust suppressants on dirt roads and graded areas, speed limits for vehicles, and covers for vehicles transporting soil. Dust control measures and BMPs would include limiting ground disturbance and vegetation removal to the extent practicable; using water on unpaved areas and stockpiles; stabilizing inactive surfaces and stockpiles with soil binders or dust palliatives; covering stockpiles at all times when not in use; using gravel at key locations on roads to prevent track-out; covering bulk material on trucks; maintain 15 mile per hour speed limits for vehicles on public and private earthen or gravel roads; and suspending grading activities during periods of high wind.

Impacts and mitigation associated with air quality are discussed in Section 4.2. In addition to addressing air quality, the Plan would assist in protecting workers and residents from exposure to soil-borne diseases such as valley fever. The potential for soil-borne diseases to be present in site soils is discussed in Section 3.9, and potential impacts and mitigation are discussed in Section 4.9.

2.3.7.7 Water Conservation

Water would be used during construction primarily for dust control and soil compaction, with small amounts used for sanitary and other purposes. Because Project water use is almost entirely associated with dust control during construction, the measures associated with the Phased Site Preparation Plan would also be used to conserve water where feasible. Although grading would be necessary in some parts of the site, the measures used to phase construction, control vehicle speed, cover stockpiles, minimize the amount of disturbed ground, and maintain existing vegetation, where feasible, would also result in minimizing water use. In addition, the use of soil stabilizers would minimize the need to use water to control dust in those areas.

Impacts and mitigation associated with water resources are discussed in Section 4.20.

2.3.7.8 Traffic

The Applicant has developed a Traffic Impact Analysis (provided in Appendix K) to evaluate and minimize impacts to traffic on local roads, as well as impacts to local residents and businesses. The Applicant proposes mitigation measures to reduce impacts associated with Project-related traffic. These include limiting the number of commuting vehicles leaving the Project site between 4:00 and 6:00 PM to 650 vehicles, and developing and implementing a Traffic and Monitoring Control Plan.

Impacts and mitigation associated with traffic and transportation are discussed in Section 4.17.

2.3.7.9 Stormwater Management

A topographic map of the Project area is shown in Figure 2-7. The Project area consists of two distinct types of topography which affect site drainage. The northwestern portion of the Project area, comprising approximately half of the overall Project site, is part of an alluvial fan which slopes in a southeastward direction from the McCoy Mountains. The I-10 highway crosses this alluvial fan between the mountains and the Project site; the natural flow of the alluvial fan is interrupted, passes through concentrated channels underneath a highway bridge, and then becomes dispersed again on its route between I-10 and the Project site.

The southeastern portion of the site is a flat plateau, part of the Palo Verde Mesa. This area receives drainage from the alluvial fan to the northwest, but also from an alluvial fan system originating in the Mule Mountains to the southwest of the Project area. The ground surface in this area is characterized by a series of depressions in which surface water can pool. A drainage divide crosses from north to south through the eastern portion of the Project area. The depressions west of this divide drain surface water to the west and southwest, meeting the flow from the Mule Mountains and eventually draining off of the mesa to the southeast, towards the Colorado River. The depressions to the east of this divide drain directly to the east, towards the Colorado River. Although the drainage flows in the direction of the Colorado River, the drainages were determined

by the USACE to be ephemeral, intrastate, isolated waters, and not under the jurisdiction of the USACE.

There are no Federal Emergency Management Agency (FEMA) designated flood zones within the vicinity of the Project. The Project site and general vicinity are classified by FEMA as Zone D – Not Studied.

The Applicant has developed a preliminary summary of a SWPPP, which would be developed and implemented prior to Project construction. The SWPPP would describe BMPs to be used for stormwater management and erosion control. The Applicant would use facility design, site preparation and stormwater control techniques to protect the facility from potential flood damage, avoid modifying upstream or downstream drainage flow rates, and avoid the potential for stormwater pollution through erosion. These techniques would be designed to encourage sheet flow across the Project site. Site preparation would be done by mowing or disk and roll method throughout most of the Project site. Where feasible, vegetation would be cut at ground level, leaving root systems in place. Cut and fill would be used in limited areas where mounding occurs, or to partially fill depressions that are too deep for the placement of solar panels. Areas which would be occupied by structures, including the O&M Building, On-Site Substation, access roads, PCS and PVCS vault areas, temporary construction area, and anemometer towers, would be graded and compacted to meet engineering specifications. As shown in Table 2-4, these areas would comprise less than one percent of the overall Project area.

In addition to site preparation, the Applicant would use fiber rolls, filter fabric fence, and other erosion control methods at locations which may be subjected to erosion. Heavily used areas, such as the construction entrance, concrete wash-out area, and trackout pad areas would be stabilized with gravel, filter fabric, and straw bales to minimize the quantity and duration of soil exposure, and to reduce the velocity of runoff.

The SWPPP would define the sequence of construction events; identify potential pollutants; identify potentially affected stream, wetlands, and locations of special-status species; describe BMPs and stormwater control measures; summarize applicable regulatory requirements; define inspection, monitoring, and maintenance requirements; define site restoration and revegetation requirements; and specify training and reporting requirements. The SWPPP would also address hazardous material storage, including precluding the storage of hazardous materials or the fueling of vehicles within 100 feet of any water body, well, or wetland.

Impacts and mitigation associated with stormwater flow are discussed in Section 4.20.

2.3.7.10 Visual Resources

The Applicant has developed a preliminary Lighting Management Plan to minimize visual impacts of the facility at night. Lighting would be shielded, focused downward and toward the interior of the facility, and would be limited to the O&M Building, the On-Site Substation, the temporary construction staging areas, and on or near each PCS station. The level and intensity of lighting would be designed to provide the minimum needed for security and safety reasons. Lighting may be controlled by hand-switches, or by motion sensors set to operate at human height. No lighting would be installed along the facility perimeter. The preliminary plan would be updated prior to construction, once final design of lighting systems is completed.

Impacts and mitigation associated with visual resources are discussed in Section 4.19.

2.3.7.11 Cultural Resources

Prior to the Notice to Proceed, the Applicant would develop a Cultural Resources Monitoring and Mitigation Plan (CRMMP), which would identify areas to be monitored during construction by a qualified archaeologist. The Plan would include an unanticipated discovery plan, which would describe procedures to be followed in the event that subsurface archaeological materials are encountered during construction. The CRMMP would include requirements for the education of construction workers regarding identification, reporting, and protection of cultural properties and suspected discoveries. The Plan would provide for curation of recovered archaeological materials with an accredited curation facility. All cultural resources to be curated from this Project will be curated in one single location.

Impacts and mitigation associated with cultural resources are discussed in Section 4.5.

2.3.7.12 Paleontological Resources

The Applicant would implement their Paleontological Resources Monitoring and Mitigation Plan prior to construction. This Plan identifies areas to be monitored by a qualified paleontological professional during construction. The Plan includes worker awareness training to educate construction personnel regarding the identification, reporting, and protection of suspected fossil discoveries. The Plan provides for curation of recovered fossils through an appropriate curation facility.

Impacts and mitigation associated with paleontological resources are discussed in Section 4.13.

2.3.7.13 Recreation

The Applicant has performed an assessment of the impact of the Project on designated open routes on the Project site (URS 2015; provided in Appendix L). Six open routes were identified within the Project footprint. Of these, three are associated with access to the 160 acre private land parcel. Because the Applicant would incorporate the private land parcel into the Project, the previous need for access to the parcel would no longer be applicable, and closure of these routes would not interfere with any access needs. The other three open routes are associated with access to the Mule Mountains to the southwest of the Project site. Although 6.8 miles of open routes would need to be closed to accommodate the Project, there are other existing open routes on the perimeter of the Project area which would continue to provide the same level of access, as shown in Figure 3.14-3.

Impacts and mitigation associated with recreation are discussed in Section 4.14.

2.4 Alternative 1: Proposed Action

The number and size of Project-related facilities associated with the Proposed Action is shown in Table 2-4, and the layout of the proposed facilities is shown in Figure 2-2. Table 2-4 also provides the land area that would be occupied the proposed facilities, expressed both as an acreage, and as a percentage of the total solar facility site land area.

The total Project area under application for BLM and County approval is approximately 5,275 acres (approximately 5,115 acres of BLM administered lands and 160 acres of private lands). Within this area, the Project would occupy approximately 3,770 acres (3,560 acres for the portion of the solar facility on BLM land, 154 acres for the portion of the solar facility on private land, 2

acres for the offsite portion of a buried telecommunications line and possible above-ground electrical service line on BLM land, and 54 acres for the gen-tie line corridor). The larger acreage under application allows for BLM and the County to consider various site layouts as Project alternatives for their environmental analysis.

As shown in Figure 2-2, the Project would include temporary construction areas located outside of the long-term Project area. A construction laydown area on the northern boundary of the Project, totaling 43 acres, would be enclosed by temporary fence during construction, would be removed and restored after the completion of construction, and would not be included within the 3,770 acre Project area. An additional 4.5 acres of temporary construction for an access road would be used. In addition, a total of 27.5 acres would be temporarily required for spur roads, laydown areas, and pulling areas for construction of the gen-tie line. Half of this acreage (approximately 14 acres) would be incorporated into the permanent gen-tie ROW, and the other half would not be included within the 3,770 acre Project area.

Including the temporary areas, the combined acreage of the BLM and County authorizations would total 3,831 acres, and the remaining area within the application boundary would not be incorporated as part of the Project.

Of the 3,714 acre solar array area, approximately 3,248 acres, or 87 percent of the site, would have site preparation performed by either mowing or the disk and roll method. Grading, in the form of cut and fill, would be performed on approximately 466 acres, or 13 percent of the site.

The output of the Proposed Action would be 450 MW. As conceived under this proposal, the Project would be PV-technology neutral, meaning it could accommodate any of a number of different panel options, regardless of the efficiency and capacity of the panels. The specific type of solar panels to be used would be determined as part of final Project design. The Proposed Action assumes that commercial panels, available to any potential developer, would be used, but the total output would be limited to 450 MW.

The majority of the Project site would be occupied by the solar arrays and power conversion equipment. The total amount of ground disturbance for the Project site would be 3,831 acres. Less than one percent of the total Project area would be covered with at-grade facilities (e.g., O&M Building, On-Site Substation, PCSs, and PVCs). Approximately 75 percent of the solar facility site would be covered or shaded by solar modules.

Table 2-4. Proposed Action Components and Approximate Land Areas

Project-Related Facility	Size or Number of Components	Approximate Land Area on BLM (acres)	Approximate Land Area on Private Land (acres)	Total Land Area (acres)¹	Percentage of Total Project Site¹
Area Included within BLM and County Applications					
BLM ROW Application Area	NA	5,115	NA	5,115	NA
Private Lands under County Jurisdiction	NA	NA	160	160	NA
Total Application Area	NA	5,115	160	5,275	NA
Facilities Within Perimeter Fence and Post-Construction ROW					
PV Arrays ²	314 arrays; 7.4 million individual modules; 506,356 piles	2,652	125	2,777	74.8%
At-Grade Items (On-Site Substation, O&M Building, PCSs, and PVCSSs)	1 On-Site Substation, 1 O&M Building, 314 PCSs, 16 PVCSSs	8.4	0.1	8.5	0.2%
Internal Access Roads	112.9 miles	396	14	410	11.1%
Construction Staging Areas ³	2	28	0	28	0.8%
Communication and Power Lines (inside fence)	1.4 miles long by 20 feet wide	3.4	0	3.4	0.1%
Undeveloped Area	NA	472	15	487	13.0%
Sub-total Area Enclosed by Perimeter Fencing⁴	17.4 miles of security fence	3,560	154	3,714	100%
Facilities Outside Perimeter Fence and Post-Construction ROW					
Gen-Tie Line Corridor	2.79 miles long by 160 feet wide	54	0	54	NA
Communication and Power Lines (outside fence)	1 mile long by 20 feet wide	2	0	2	NA
Total Permanent Project Area¹	NA	3,616	154	3,770	NA
Facilities Outside Perimeter Fence, Temporary ROW for Construction					
Temporary Construction Staging Areas ⁵	2	43	0	43	NA

Table 2-4. Proposed Action Components and Approximate Land Areas

Project-Related Facility	Size or Number of Components	Approximate Land Area on BLM (acres)	Approximate Land Area on Private Land (acres)	Total Land Area (acres)¹	Percentage of Total Project Site¹
External Access Road ⁶	1.2 miles	4.5	0	4.5	NA
Temporary Disturbance Areas associated with Gen-Tie Structure Sites, Spur Roads, Pulling Sites, and Laydown Area	NA	13.8	0	13.8	NA
Total Temporary Project Area	NA	61	0	61	NA
Total Project Area¹	NA	3,677	154	3,831	NA

- 1 - Values may not add to 100% due to rounding to nearest whole number.
- 2 - Acreage based on horizontal tracker design, which represents worst-case disturbance compared to fixed-tilt designs.
- 3 - Includes two construction staging areas. These areas will not be covered with solar panels and are considered undeveloped area from a long term perspective.
- 4 - Even though the term of the ROW would be 30 years, all disturbance within the perimeter fence is considered to be permanent disturbance, for the purpose of impact analysis.
- 5 - Includes two temporary construction staging areas, construction offices and parking and temporary water storage. This area will be enclosed by temporary perimeter fencing.
- 6 - Exact location to be determined based on final design, and approved by BLM in the Final POD. Length and acreage are maximum, not to be exceeded.

2.5 Alternative 2: Resource Avoidance Alternative

The number and size of Project-related facilities associated with Alternative 2, the Resource Avoidance Alternative, is shown in Table 2-5, and the layout of the proposed facilities is shown in Figure 2-9. Table 2-5 also provides the land area that would be occupied by the facilities, expressed both as an acreage, and as a percentage of the total Project land area.

The Resource Avoidance Alternative was developed to specifically reduce impacts to cultural and biological resources, as well as drainages and watercourses. In general, the alternative would avoid the drainages and sand dunes in the northwestern portion of the Project area, as well as resources in the southwestern portion of the Project area. This alternative further provides a buffer between the project and avoided resources in most instances. To accommodate the re-location of the northern Project boundary and to avoid resources, the locations of the O&M Building, On-Site Substation, and temporary construction areas in the Proposed Action would be moved from the northwestern Project boundary to the northeastern Project boundary. This would result in moving the On-Site Substation a further distance from the CRSS, and thus require an increase in the length of the gen-tie line from 2.79 to 3.94 miles.

To avoid potential conflicts with the proposed 10 West transmission line, which would occupy the Corridor K/Section 368 Federal Energy Corridor 30-52 along the northern boundary of the Project area, the route of the gen-tie line in Alternative 2 would vary from that of the Proposed Action. In

the Proposed Action, the gen-tie line crosses directly northward to the corridor, crosses directly west within the corridor to the northeastern corner of the CRSS, and then crosses directly south to enter the CRSS. As shown in Figure 2-9, under Alternative 2, the gen-tie line would cross in a generally diagonal direction to the northwest, until it reaches the western boundary of the ROW application area. At that location, the line would traverse directly north into the corridor, cross directly west within the corridor to the northeastern corner of the CRSS, and then cross directly south to enter the CRSS.

The Resource Avoidance Alternative would be based on the use of thin-film technology with CdTe as the semiconductor material, or other high efficiency technology. Because of advancements in technology and efficiency of solar panels, the Resource Avoidance Alternative would generate the same power output as the Proposed Action, but would do so on a reduced Project footprint that has been designed to avoid specific biological, cultural, and other resource impacts. The thin-film technology panels use an anti-reflective coating (ARC), which is applied in order to reduce the reflectivity of solar panels.

The output of the Resource Avoidance Alternative would be 450 MW, the same as the Proposed Action. As with the Proposed Action, the majority of the Project site would be occupied by the solar arrays and power conversion equipment. The total amount of ground disturbance would be 2,833 acres. Less than one percent of the total Project area would be covered with at-grade facilities (e.g., O&M Building, On-Site Substation, PCSs, and PVCs). Approximately 72 percent of the total Project area would be covered or shaded by solar modules.

Of the 2,698 acre solar array area included in Alternative 2, approximately 2,403 acres, or 89 percent of the site, would have site preparation performed by either mowing or the disk and roll method. Grading, in the form of cut and fill, would be performed on approximately 295 acres, or 11 percent of the site.

Table 2-5. Alternative 2 Components and Approximate Land Areas

Project-Related Facility	Size or Number of Components	Approximate Land Area on BLM (acres)	Approximate Land Area on Private Land (acres)	Total Land Area (acres)¹	Percentage of Total Project Site¹
Area Included within BLM and County Applications					
BLM ROW Application Area	NA	5,115	NA	5,115	NA
Private Lands under County Jurisdiction	NA	NA	160	160	NA
Total Application Area	NA	5,115	160	5,275	NA
Facilities Within Perimeter Fence and Post-Construction ROW					
PV Arrays ²	139 arrays; 1.08 million individual modules; 390,312 piles	1,805	141	1,946	72.13%

Table 2-5. Alternative 2 Components and Approximate Land Areas

Project-Related Facility	Size or Number of Components	Approximate Land Area on BLM (acres)	Approximate Land Area on Private Land (acres)	Total Land Area (acres)¹	Percentage of Total Project Site¹
At-Grade Items (On-Site Substation, O&M Building, PCSs, and PVCSS)	1 Substation, 1 O&M Building, 132 PCSs, 10 PVCSS	5.6	0.1	5.7	0.21%
Internal Access Roads	30 miles	69	4	73	2.71%
Construction Staging Areas ³	0	0	0	0	0%
Communication and Power Lines (inside fence)	0.3 miles long by 20 feet wide	1	0	1	<0.1%
Undeveloped Area	NA	657	15	672	24.92%
Sub-total Area Enclosed by Perimeter Fencing⁴	17.8 miles of security fence	2,538	160	2,698	100%
Facilities Outside Perimeter Fence and Post-Construction ROW					
Gen-Tie Line Corridor	3.94 miles long by 140 feet wide	67	0	67	NA
Communication and Power Lines (outside fence)	1.2 mile long by 20 feet wide	2.8	0	2.8	NA
Total Permanent Project Area¹	NA	2,608	160	2,768	NA
Facilities Outside Perimeter Fence, Temporary ROW for Construction					
Temporary Construction Staging Areas ⁵	2	37	0	37	NA
External Access Road ⁶	14,499 feet	7.2	0	7.2	NA
Temporary Disturbance Areas associated with Gen-Tie Structure Sites, Spur Roads, Pulling Sites, and Laydown Area	NA	20.7	0	20.7	NA
Total Temporary Project Area	NA	64.9	0	64.9	NA
Total Project Area¹	NA	2,673	160	2,833	NA

Table 2-5. Alternative 2 Components and Approximate Land Areas

Project-Related Facility	Size or Number of Components	Approximate Land Area on BLM (acres)	Approximate Land Area on Private Land (acres)	Total Land Area (acres) ¹	Percentage of Total Project Site ¹
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- 1 - Values may not add to 100% due to rounding to nearest whole number.
- 2 - Acreage based on horizontal tracker design, which represents worst-case disturbance compared to fixed-tilt designs.
- 3 - Staging areas inside perimeter fence would be covered with solar panels, so are included in PV array acreage.
- 4 - Even though the term of the ROW would be 30 years, all disturbance within the perimeter fence is considered to be permanent disturbance, for the purpose of impact analysis.
- 5 - Includes two temporary construction staging areas, construction offices and parking and temporary water storage. This area will be enclosed by temporary perimeter fencing.
- 6 - Varies from 20 to 30 feet wide. Exact location to be determined based on final design, and approved by BLM in the Final POD. Length and acreage are maximum, not to be exceeded.

2.6 Alternative 3: Reduced Project Alternative

The number and size of Project-related facilities associated with Alternative 3, the Reduced Project Alternative, is shown in Table 2-6, and the layout of the proposed facilities is shown in Figure 2-10. Table 2-6 also provides the land area that would be occupied by the facilities, expressed both as an acreage, and as a percentage of the total Project land area.

The Reduced Project Alternative further reduces the acreage of the solar arrays, with elimination of the proposed solar arrays primarily in the northern portion of the area to maintain habitat for the Mojave fringe-toed lizard and Harwood’s eriastrum, a BLM Sensitive Species plant. The locations of the O&M Building and On-Site Substation would be situated at the same location as in Alternative 2, and the gen-tie line would be routed the same as in Alternative 2.

The output of the Reduced Project Alternative would be 285 MW. The Reduced Project Alternative would use CdTe PV panels or other high efficiency technology. The thin-film technology panels use an anti-reflective coating (ARC), which is applied in order to reduce the reflectivity of solar panels. The majority of the Project site would be occupied by the solar arrays and power conversion equipment. The total amount of ground disturbance would be 2,099 acres. Less than one percent of the total Project area would be covered with at-grade facilities (e.g., O&M Building, On-Site Substation, PCSs, and PVCSSs). Approximately 76 percent of the total Project area would be covered or shaded by solar modules.

Of the 1,963 acre solar array area included in Alternative 3, approximately 1,703 acres, or 87 percent of the site, would have site preparation performed by either mowing or the disk and roll method. Grading, in the form of cut and fill, would be performed on approximately 260 acres, or 13 percent of the site.

Table 2-6. Alternative 3 Components and Approximate Land Areas

Project-Related Facility	Size or Number of Components	Approximate Land Area on BLM (acres)	Approximate Land Area on Private Land (acres)	Total Land Area (acres)¹	Percentage of Total Project Site¹
Area Included within BLM and County Applications					
BLM ROW Application Area	NA	5,115	NA	5,115	NA
Private Lands under County Jurisdiction	NA	NA	160	160	NA
Total Application Area	NA	5,115	160	5,275	NA
Facilities Within Perimeter Fence and Post-Construction ROW					
PV Arrays ²	107 arrays; 832,032 individual modules; 300,456 piles	1,352	141	1,493	76.49%
At-Grade Items (On-Site Substation, O&M Building, PCSs, and PVCSS)	1 On-Site Substation, 1 O&M Building, 104 PCSs, 9 PVCSS	5.6	0.1	5.7	0.29%
Internal Access Roads	20 miles	44	4	48	2.46%
Construction Staging Areas ³	0	0	0	0	0%
Communication and Power Lines (inside fence)	0.3 miles long by 20 feet wide	1	0	1	<0.1%
Undeveloped Area	NA	400	15	415	21.26%
Sub-total Area Enclosed by Perimeter Fencing⁴	13.2 miles of security fence	1,803	160	1,963	100%
Facilities Outside Perimeter Fence and Post-Construction ROW					
Gen-Tie Line Corridor	3.94 miles long by 140 feet wide	67	0	67	NA
Communication and Power Lines (outside fence)	1.2 mile long by 20 feet wide	2.8	0	2.8	NA
Total Permanent Project Area¹	NA	1,873	160	2,033	NA
Facilities Outside Perimeter Fence, Temporary ROW for Construction					
Temporary Construction Staging Areas ⁵	2	37	0	37	NA

Table 2-6. Alternative 3 Components and Approximate Land Areas

Project-Related Facility	Size or Number of Components	Approximate Land Area on BLM (acres)	Approximate Land Area on Private Land (acres)	Total Land Area (acres)¹	Percentage of Total Project Site¹
External Access Road ⁶	16,973 feet	8.36	0	8.36	NA
Temporary Disturbance Areas associated with Gen-Tie Structure Sites, Spur Roads, Pulling Sites, and Laydown Area	NA	20.7	0	20.7	NA
Total Temporary Project Area	NA	66.1	0	66.1	NA
Total Project Area¹	NA	1,939	160	2,099	NA

1 - Values may not add to 100% due to rounding to nearest whole number.

2 - Acreage based on horizontal tracker design, which represents worst-case disturbance compared to fixed-tilt designs.

3 - Staging areas inside perimeter fence would be covered with solar panels, so are included in PV array acreage.

4 - Even though the term of the ROW would be 30 years, all disturbance within the perimeter fence is considered to be permanent disturbance, for the purpose of impact analysis.

5 - Includes two temporary construction staging areas, construction offices and parking and temporary water storage. This area will be enclosed by temporary perimeter fencing.

6 -Varies from 20 to 30 feet wide. Exact location to be determined based on final design, and approved by BLM in the Final POD. Length and acreage are maximum, not to be exceeded.

2.7 Alternative 4: No Action Alternative

Under the No Action Alternative, the BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, no new structures or facilities would be constructed, operated and maintained, or decommissioned on the site, and no related ground disturbance or other Project-specific impacts would occur at this time.

The Western Solar Plan ROD designated the Riverside East SEZ (including the DQSP application area) as a priority area for commercial-scale solar development. In addition, the area has been designated as a DFA in the DRECP. Accordingly, a different commercial-scale solar development may be proposed within the ROW application area even if the DQSP ROW application were denied. Because the Project area has been designated as a DFA in the DRECP, it would be subject to development under those parameters.

2.8 Preferred Alternative/Environmentally Superior Alternative

Under NEPA, the “preferred alternative” is a preliminary indication of the Lead Agency’s preference of action among the Proposed Action and alternatives. A NEPA Lead Agency may select a preferred alternative for a variety of reasons, including the agency’s priorities, in addition to the environmental considerations discussed in the EIS.

A comparison of the potential environmental impacts associated with the four Project Alternatives (No Project/No Action Alternative and three action Alternatives) are summarized in Table ES-1. The impacts, mitigation measures, and residual impacts after mitigation of the proposed Project and alternatives are detailed in Chapter 4 of this Final PA/EIS/EIR.

The BLM (NEPA Federal Agency) has identified Alternative 2: Resource Avoidance alternative as the Agency Preferred Alternative. This identification is based on BLM planning regulations (BLM Manual 1790-1, Ch V(B)(4)(c)). The BLM will re-evaluate the preferred alternative following analysis of public comments on the Final PA/EIS/EIR.

CEQA requires analysis of a reasonable range of alternatives to the proposed Project to foster informed decision making and public participation (14 CCR § 15126.6(a)) and the identification of an environmentally superior alternative. If the environmentally superior alternative is the "no project" alternative, the EIR must also identify an environmentally superior alternative among the other alternatives (state CEQA Guidelines § 15126.6(e)).

The magnitude of impacts, including acreages, numbers of impacted receptors, and amounts of emissions are discussed in Table ES-1, and a summary of the significance of impacts under CEQA is provided in Table ES-2. After comparing and weighing the benefits and impacts of all of the feasible alternatives, the County (CEQA Lead Agency) has identified Alternative 4, the No Action Alternative, as the environmentally superior alternative, subject to public review.

Because the No Action Alternative would not accomplish the County's or Applicant's objectives, the County has reviewed the impacts associated with the three action alternatives, Table ES-1 shows that Alternative 3 involves the least amount of total ground disturbance. However, this reduction in total acreage results in a project that would produce 285 MW, which falls short of the County's and Applicant's objective of generating 450 MW. At the same time, the impacts of Alternative 3 to the *Pleuraphis rigida* vegetation alliance, state jurisdictional waters, occupied habitat for the Harwood's eriastrum, occupied habitat for the Mojave fringe-toed lizard, CRHR-eligible cultural resources, and groundwater use would be the same as Alternative 2, which does meet the objective of generating 450 MW. As a result, the County has identified Alternative 2 as the environmentally superior alternative among the action alternatives, pending analysis of public comments on the Final PA/EIS/EIR.

2.9 Alternatives Considered but Eliminated from Detailed Analysis

2.9.1 Rationale for Eliminating Alternatives

In accordance with 43 CFR 2804.10, the BLM worked closely with the Applicant during the pre-application phase to identify appropriate areas to site the Project. The BLM discouraged the Applicant from including in its application alternate BLM locations with significant environmental concerns, such as critical habitat, Areas of Critical Environmental Concern (ACECs), Tortoise Conservation Areas (TCAs) and associated wildlife linkages, designated off-highway vehicle (OHV) areas, wilderness study areas, and designated wilderness areas. The BLM encouraged the Applicant to locate its Project on public land with the fewest potential conflicts.

Other alternative sites, technologies and methods discussed below were considered by the BLM but eliminated from detailed analysis under NEPA. These alternatives were eliminated from detailed analysis based on one or more of the following reasons:

1. It is ineffective (it would not respond to the BLM's purpose and need)
2. It is technically or economically infeasible
3. It is inconsistent with the basic policy objectives for the management of the area (such as, not in conformance with the land use plan (i.e., the CDCA Plan)
4. Its implementation is remote or speculative
5. It is substantially similar in design to an alternative that is analyzed
6. It would have substantially similar effects to an alternative that is analyzed

Consistent with the sixth reason to eliminate a potential alternative from detailed analysis, the BLM and County also considered whether a proposed alternative would avoid or reduce to a level of insignificance effects to human or environmental resources associated with the Proposed Action, or, conversely, create significant effects potentially greater than those of the Proposed Action.

State CEQA Guidelines (Section 15126.6) state the following:

- (a) An EIR [Environmental Impact Report] shall describe a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.
- (b) The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- (c) The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.
- (d) The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.
- (e) The EIR shall include the evaluation of the "No project" alternative.
- (f) The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

This process for eliminating alternatives from detailed analysis complies with 40 CFR 1502.14(a), BLM IM 2011-059, PA Handbook Section 6.6.3, and state CEQA Guidelines Section 15126.6. It is described briefly in the following sections.

2.9.2 Alternatives Considered but Eliminated from Detailed Analysis

Alternatives considered included alternative sites, alternative construction methods, alternative designs and layouts, and alternative technologies for generating or delivering power.

2.9.2.1 Site Alternatives

Potential alternative sites to the DQSP site include sites entirely on private land, different locations on BLM-managed public lands, brownfield sites identified by the U.S. Environmental Protection Agency (EPA), and distributed generation alternatives.

In deciding where to propose the development of new solar facilities, the Applicant considered multiple options, including sites on private land and on other BLM-administered lands. The Applicant's consideration of alternative locations for large-scale solar facilities was restricted by several criteria, including:

- Availability of a contiguous area of land large enough to accommodate the proposed Project;
- Technical constraints, including insolation, slope, and hydrology;
- Environmental impacts, based on the presence of potentially impacted resources and associated management and resource protection constraints; and
- Costs associated with site accessibility, and proximity to existing high voltage transmission facilities with sufficient available capacity and viable access to energy markets, including suitable interconnection and priority queue position.

In evaluating potential sites, the Applicant also reviewed the Transmission Ranking Cost Report filed by SCE with the California Public Utilities Commission (CPUC) to identify feasible interconnection locations. In this review, the Applicant identified the CRSS as one of the most viable interconnection points for new renewable projects, and thus considered site locations which met the factors presented above.

Private Land Alternative

Private lands within Riverside County were considered by the Applicant for development of the proposed solar PV energy facility. The Applicant's siting process identified the area along the I-10 corridor, in close proximity to the CRSS, as an area where sites that meet the criteria discussed above are found. In general, the land ownership in this area does not include large, available or obtainable parcels of private property, or multiple private parcels in close proximity to one another, that are sufficiently close to transmission. The area does have large areas of privately-owned agricultural land in and around the city of Blythe. However, much of this land is currently under cultivation, has sufficient water sources to grow crops, and is part of an interdependent hydrologic system managed through agreements with the Metropolitan Water District of Southern California. In addition, many of these parcels are encumbered by Williamson Act contracts, and purchasing and converting such land, including prime farmlands, to nonagricultural uses would significantly increase the time, effort and cost of obtaining control of these parcels for solar development. These lands are also located in closer proximity to, and in the floodplain of, the Colorado River, potentially increasing environmental impacts and flood risks as compared to sites, such as the DQSP site, located at a higher elevation.

In considering solar development in close proximity to the CRSS, the Applicant engaged local real estate experts to determine the feasibility of acquiring enough private land for the Project. Compiling enough contiguous small land parcels necessary to develop a commercial-scale solar facility is difficult. The Applicant evaluated private land holdings in the Palo Verde area, Coachella Valley, north of Blythe, and near the Salton Sea. Private land in the Palo Verde and Coachella Valley areas is highly parcelized, and the Palo Verde area is complicated by the presence of significant drainages, an adjacent wilderness area, and close proximity to the Colorado River to the east. Abandoned agricultural lands and other private land north of Blythe are less parcelized, but also require substantially longer gen-tie transmission lines to connect to the CRSS, increasing resource impacts and costs. Larger parcel options near the Salton Sea do not have viable transmission options. In evaluating potential sites, the Applicant determined that it was not feasible to compile the privately-owned acreage necessary to accommodate the proposed Project and have available interconnection access to the CRSS.

The challenges in compiling private land parcels have been documented in environmental analysis documents for other nearby solar facilities. For example, for the EIS for the McCoy Solar Energy Project (MSEP), located just north of the DQSP on the other side of I-10, the Applicant for that project evaluated more than 195,000 acres of private land within 20 miles of the CRSS, and determined that only 68 individual parcels, comprising about 4,700 acres, were available for sale or lease. The largest contiguous block was 858 acres, which consisted of 7 different parcels owned by four different landowners.

Because insufficient private land was available to meet the basic needs of the Project, an all-private land alternative was not carried forward for detailed consideration.

Alternative BLM-Administered Land

In general, BLM-administered land satisfies the need to provide contiguous parcels of land of sufficient size, and in close proximity to transmission infrastructure, better than does a private land alternative. However, BLM land is also constrained by technical factors and resource protections which limit the number and size of sites that can be considered for solar development. Much of the BLM-administered land in the California desert is precluded from development by special designations such as wilderness areas and ACECs, and many potentially suitable areas outside these designated areas are precluded because they are in use. The changes to land use allocations under the DRECP further restrict the availability of BLM-administered land on which solar development can occur.

The Applicant has submitted ROW applications for numerous other potential sites in eastern Riverside County in the past, including Desert Opal (CACA-48818), Desert Jasper (CACA-49357), Desert Onyx (CACA-4894), Desert Amber (CACA-49361), Desert Ruby (CACA-48819), Desert Sapphire (CACA-48820), Desert Garnet (CACA-49017), Desert Obsidian (CACA-49511) and Desert Turquoise (CACA-49613). The Applicant's predecessor, Nextlight Renewable Power, filed an application for a 4,120 acre site between the Coxcomb Mountains and the Palen Dry Lake that was specifically intended to be an alternative to the DQSP Project site in 2010 (CACA-051954, the "Golden State Solar Project"). These applications have all been withdrawn, for various reasons related to resource impact concerns and/or lack of necessary transmission developments and upgrades.

More importantly, BLM has already determined that the DQSP site is suitable for solar development, in both the Western Solar Plan and the DRECP. The Western Solar Plan identified specific locations that, at a plan level, appear well-suited for utility-scale production of solar energy where the BLM would prioritize development (i.e., solar energy zones or SEZs) as well as categories of lands to be excluded from such development. The area of the DQSP was designated as the Riverside East SEZ, signifying that the DQSP site and the surrounding area are preferred for large-scale solar energy development based on environmental and technical suitability for such development.

Although both the Western Solar Plan and the DRECP include a process for proposing renewable energy projects on “variance lands” outside of designated SEZs and DFAs, the objective of these landscape-level planning efforts was to promote development in certain designated areas. Through the Western Solar Plan, BLM already considered whether other locations on public lands might be suitable for solar development and, after years of review, determined that the Riverside East SEZ, encompassing the proposed DQSP, contained the areas most suitable for solar development. Similarly, the DRECP considered technical suitability and resource impacts in implementing new land use allocations for resource protection, and for the focus of renewable energy development. Although the DQSP application is exempt from the land use decisions made in the DRECP because it is a pending application, the DRECP recognized the area of the DQSP site as suitable for solar development by designating it as a DFA.

As a result of the technical, procedural, and environmental constraints discussed above, timely development of the Project on other lands administered by BLM would not be feasible, and is likely to be inconsistent with the basic policy objectives for management of areas outside of the proposed DFAs.

Brownfield Sites

The USEPA tracks 480,000 contaminated sites for potential reuse for renewable energy development as part of its RE-Powering America's Lands Initiative. Of these sites, USEPA has identified 5,000 sites nationwide as potentially suitable for PV development. Using the USEPA's Renewable Energy Interactive Mapping Tool, which is a Google Earth KMZ file, it is possible to view information about potential utility scale PV solar energy sites on contaminated lands. In addition to the contaminated site's location, the tool also provides the site name and identification information, a link to the site's cleanup status information, and specific acreage and renewable energy resource information. For example, the tool indicates which potential sites are (and which are not) within a designated Renewable Energy Zone (REZ). REZs have been established by the BLM in coordination with the Western Governors Association, the Department of Energy, and the States of Colorado and California and take into consideration both resource potential and exclusion zones.

Using the tool to select USEPA tracked sites (i.e., abandoned mined lands, brownfields, RCRA sites, Federal and non-Federal Superfund sites, and landfills) as well as state-tracked sites, BLM identified four locations with excellent utility solar power potential along the I-10 corridor between Riverside and the Arizona border. These sites ranged in size from 75 to 160 acres, and are therefore not of a scale necessary to generate 450 MW of solar power.

The Applicant also reviewed a Google Earth Map and data set developed by USEPA and the National Renewable Energy Laboratory (NREL) that illustrates approximately 11,000

contaminated and degraded public and private sites in California that could be candidates for renewable energy development (USEPA 2016). This tool includes additional California sites and uses a screening tool to filter and suggest sites as the best for utility-scale renewable energy development based on the various renewable energy technologies and associated screening criteria.

Of the approximately 11,000 sites, only one potential utility-scale PV solar site was identified within nearly 50 miles of the proposed site: Wiley Wells Water Point, which is a former military training area located south of I-10 and 12 miles west of Ripley. This site is located seven miles from the grid connection at the CRSS, and approximately seven miles from an access road. In addition, the site has had very little historic use, so is undeveloped. In contrast, the DQSP site is located approximately 1.5 miles from the CRSS, is adjacent to a designated utility corridor, and is bordered by county roads that can provide site access. Although the BLM portion of the site is undeveloped, the site is bordered by high voltage transmission lines on all sides, and there is an existing solar generation facility bordering the site to the north. Based on its proximity to transmission and access road infrastructure, the DQSP is expected to be more favorable, and have fewer environmental impacts, than the Wiley Wells site, so the Wiley Wells site was eliminated from further consideration.

2.9.2.2 Alternative Construction Methods

The Applicant considered using construction methods that would reduce or eliminate the amount of grading and vegetation removal that would occur during site preparation. In general, some level of both grading and vegetation removal is needed due to safety and constructability issues.

With respect to safety, removal of vegetation and leveling of the ground surface is necessary because materials, including the panels and the modular supports, are moved about the site and stored in stacks. The materials are brought in by truck, but then must be moved to their installation location by forklifts, and set on the ground on pallets and on folding tables. Moving stacks of materials by forklift, or storing them on pallets in stacks, on uneven ground presents a very high risk of toppling of the stacks. This process would not only damage the materials, but would be a substantial safety hazard for workers in the vicinity. In addition, the panel installation process occurs by workers on foot. This includes workers on foot moving as spotters for the forklifts and cranes (often moving backwards), and also workers on foot attaching panels to the modular supports with clamps. Performing these tasks on uneven ground, and with vegetation present, would present a substantial tripping hazard.

In addition to safety issues, the installation of PV panels requires very limited vertical and horizontal tolerances. Each row of panels is attached to a series of 28 support posts, and the support posts must be perfectly straight, and aligned to within 0.5 inches vertical height. Installing the posts within this tolerance using post drivers sitting on uneven surfaces is not feasible.

Through the application and environmental review process, BLM worked with the Applicant to ensure that site grading and vegetation removal would be minimized to the extent necessary for safety and constructability. Although the agency agrees that vegetation impacts would be reduced by mowing as opposed to grading, leaving original topography and vegetation onsite would increase construction safety hazards and render panel installation infeasible. Therefore, an alternative which would maintain all on-site drainages and vegetation was eliminated as being infeasible.

2.9.2.3 Migratory Bird and Special Status Species Protection Alternative

During scoping, the USFWS requested that an alternative designed to minimize impacts to migratory birds, as well as other special status species, be considered. As shown in Table 2-7, some of the features of these suggestions are already incorporated into either the Proposed Action or into the Resource Avoidance or Reduced Project Alternatives. Other suggested features are not technically or economically feasible. As a result, a specific Migratory Bird and Special Status Species Protection Alternative was not developed, but the features which are feasible are encompassed within the existing alternatives.

Table 2-7. Potential Actions to be Incorporated for Protection of Migratory Birds and Other Special Status Species

Recommended Project Feature	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative
Reduce project footprint to the extent possible to minimize attractive illusion of a large water body.	The Project footprint is minimized, for the technology proposed, by using optimal (tightest) spacing of solar array.	Proposed use of different technology (CdTe panels) allows Project footprint to be reduced further, while maintaining the same output.	Project footprint reduced further, by reducing proposed output from 450 to 285 MW.
Instead of long continuous rows, use irregular spacing for solar arrays to break up the illusion of a large water body. Fill in spaces if monitoring demonstrates no difference in mortalities.	Irregular spacing within arrays reduces power output, results in an increase in the Project footprint, and is not economically feasible.	Irregular spacing within arrays reduces power output, results in an increase in the Project footprint, and is not economically feasible. Irregular overall outline of this alternative may contribute to breaking up the illusion of a large water body.	Irregular spacing within arrays reduces power output, results in an increase in the Project footprint, and is not economically feasible. Irregular overall outline of this alternative may contribute to breaking up the illusion of a large water body.
No construction ponds.	Water storage is required to ensure adequate water availability for dust control during construction. Temporary ponds or tanks are proposed during construction. No ponds would be used for operations.	Water storage is required to ensure adequate water availability for dust control during construction. Temporary ponds or tanks are proposed during construction. No ponds would be used for operations.	Water storage is required to ensure adequate water availability for dust control during construction. Temporary ponds or tanks are proposed during construction. No ponds would be used for operations.
Undergrounding or monopoles for gen-ties and distribution lines.	Gen-tie line would use tubular steel monopoles, but collection lines within solar arrays may use H-frame construction.	Gen-tie line would use tubular steel monopoles, but collection lines within solar arrays may use H-frame construction.	Gen-tie line would use tubular steel monopoles, but collection lines within solar arrays may use H-frame construction.
Use dual-axis tracking panels so that panels may be tilted vertically at night, to break up any illusion of a large water body.	There are no commercial applications of this technology to utility-scale PV power plants. Dual axis trackers use up to twice the land area of single-axis trackers (Sunpower 2016).	There are no commercial applications of this technology to utility-scale PV power plants. Dual axis trackers use up to twice the land area of single-axis trackers (Sunpower 2016).	There are no commercial applications of this technology to utility-scale PV power plants. Dual axis trackers use up to twice the land area of single-axis trackers (Sunpower 2016).
Test deterrent systems such as lights and noise.	No deterrent systems are proposed.	No deterrent systems are proposed.	No deterrent systems are proposed.

Table 2-7. Potential Actions to be Incorporated for Protection of Migratory Birds and Other Special Status Species

Recommended Project Feature	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative
Leave a gap in bottom of the fence to evaluate wildlife use of the site after construction.	Tortoise fencing requirements preclude leaving a gap.	Tortoise fencing requirements preclude leaving a gap.	Tortoise fencing requirements preclude leaving a gap.
Utilize some sort of fence marking to reduce avian collisions with newly constructed fences.	The BBCS proposes to use fence markings.	The BBCS proposes to use fence markings.	The BBCS proposes to use fence markings.
Avoid the sand transport corridor to the extent possible, in particular those areas mapped as active/stabilized dunes that support the species as identified in the Project-specific surveys.	Proposed Action would disturb portions of the sand transport corridor, mostly by placement of solar arrays.	The alternative is designed, in part, to reduce direct impacts to sand dunes. Most disturbance would be temporary disturbance associated with gen-tie construction.	The alternative is designed, in part, to reduce direct impacts to the sand dunes. Most disturbance would be temporary disturbance associated with gen-tie construction.
Avoid using lattice-type structures or placing external ladders and platforms on any infrastructure to minimize perching and nesting.	Gen-tie line would use tubular steel monopoles, but collection lines within solar arrays may use H-frame construction. No lattice structures are proposed.	Gen-tie line would use tubular steel monopoles, but collection lines within solar arrays may use H-frame construction. No lattice structures are proposed.	Gen-tie line would use tubular steel monopoles, but collection lines within solar arrays may use H-frame construction. No lattice structures are proposed.
Avoid use of guy wires on meteorological towers.	The meteorological stations would not use guy wires.	The meteorological stations would not use guy wires.	The meteorological stations would not use guy wires.
Use minimal lighting. Where lighting is necessary, facility lighting should be focused downward to reduce sky illumination	Section 2.3.7.10 discusses the components of the Lighting Management Plan, which would include minimizing lighting and focusing lighting downward.	Section 2.3.7.10 discusses the components of the Lighting Management Plan, which would include minimizing lighting and focusing lighting downward.	Section 2.3.7.10 discusses the components of the Lighting Management Plan, which would include minimizing lighting and focusing lighting downward.
Build power lines in accordance with guidelines from the Avian Power Line Interaction Committee.	Conformance with APLIC is discussed in Section 2.3.7.5, and is a requirement of Mitigation Measure VEG-8.5.	Conformance with APLIC is discussed in Section 2.3.7.5, and is a requirement of Mitigation Measure VEG-8.5.	Conformance with APLIC is discussed in Section 2.3.7.5, and is a requirement of Mitigation Measure VEG-8.5.
Minimize permanent disturbance area by minimizing creation of roads, avoidance of excessive clearing of vegetation, and avoidance of grading whenever possible.	Site preparation methods are discussed in Section 2.3.4.3. Site preparation would use mowing or disk contour grade and roll methods and compaction of vegetation, in order to leave topsoil and vegetative matter in place, to the extent feasible.	Site preparation methods are discussed in Section 2.3.4.3. Site preparation would use mowing or disk contour grade and roll methods and compaction of vegetation, in order to leave topsoil and vegetative matter in place, to the extent feasible.	Site preparation methods are discussed in Section 2.3.4.3. Site preparation would use mowing or disk contour grade and roll methods and compaction of vegetation, in order to leave topsoil and vegetative matter in place, to the extent feasible.

Table 2-7. Potential Actions to be Incorporated for Protection of Migratory Birds and Other Special Status Species

Recommended Project Feature	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative
Clear vegetation outside the bird breeding season pursuant to a Nest Bird Plan; any variances should be approved by the agencies.	Mitigation Measure WIL-7 requires pre-construction surveys and nest avoidance if construction takes place during breeding season.	Mitigation Measure WIL-7 requires pre-construction surveys and nest avoidance if construction takes place during breeding season.	Mitigation Measure WIL-7 requires pre-construction surveys and nest avoidance if construction takes place during breeding season.
Perform clearance surveys to locate and identify active nests or bat colonies	The results of pre-application bat surveys are summarized in Table 3.4-1. No roosting habitat for bats exists onsite.	The results of pre-application bat surveys are summarized in Table 3.4-1. No roosting habitat for bats exists onsite.	The results of pre-application bat surveys are summarized in Table 3.4-1. No roosting habitat for bats exists onsite.
Conduct surveys for golden eagle nests each year during construction activities within the nesting season.	The results of pre-application golden eagle surveys are summarized in Table 3.4-1. No nesting habitat for golden eagles exists onsite.	The results of pre-application golden eagle surveys are summarized in Table 3.4-1. No nesting habitat for golden eagles exists onsite.	The results of pre-application golden eagle surveys are summarized in Table 3.4-1. No nesting habitat for golden eagles exists onsite.
Conduct clearance surveys for burrowing owls, including a 150-m buffer area.	Mitigation Measure WIL-9 requires burrowing owl surveys within 656 foot of any construction area.	Mitigation Measure WIL-9 requires burrowing owl surveys within 656 foot of any construction area.	Mitigation Measure WIL-9 requires burrowing owl surveys within 656 foot of any construction area.
Conduct mandatory site training for all construction personnel regarding avoidance of nests and bat colonies and other biological resources.	Mitigation Measure VEG-6 requires a Worker Environmental Awareness Program.	Mitigation Measure VEG-6 requires a Worker Environmental Awareness Program.	Mitigation Measure VEG-6 requires a Worker Environmental Awareness Program.
Conduct raven management on-site for the life of the Project; including water and refuse control to avoid creating attractions for birds or bats.	Mitigation Measure WIL-5 specifies requirements for raven management for the life of the Project.	Mitigation Measure WIL-5 specifies requirements for raven management for the life of the Project.	Mitigation Measure WIL-5 specifies requirements for raven management for the life of the Project.
Develop and implement an Integrated Weed Management Plan.	APM BIO-5 specifies the components of the Applicant's Integrated Weed Management Plan.	APM BIO-5 specifies the components of the Applicant's Integrated Weed Management Plan.	APM BIO-5 specifies the components of the Applicant's Integrated Weed Management Plan.
Use native species for seeding and planting during re-vegetation efforts.	Section 2.3.7.2 discusses the requirement for a VRMP, including use of native species.	Section 2.3.7.2 discusses the requirement for a VRMP, including use of native species.	Section 2.3.7.2 discusses the requirement for a VRMP, including use of native species.

2.9.2.4 Alternative Energy Projects

Table 2-8 describes alternative types of energy technologies and sources that were considered by the BLM but not carried forward for detailed analysis and the agency's rationale for dismissing from further review.

Table 2-8. Other Types of Energy Projects Eliminated from Detailed Analysis

Alternative	Responsiveness to Purpose and Need	Meets Policy Objectives	Feasibility	Environmental Criteria
<p><i>Stirling Dish Technology</i></p> <p>Uses mirrors distributed over a parabolic dish surface to concentrate sunlight on a receiver fixed at the focal point. Uses a working fluid such as hydrogen that is heated up to temperatures of approximately 1,200° F in the receiver to drive an engine. A dish will generate 5-30 kilowatts (kW) of electricity depending on the system. Stirling Energy Systems' 25 kW SunCatcher™ is 38 feet tall and 40 feet wide.</p>	<p>Would not meet BLM's purpose and need to respond to an application for a solar PV facility on public lands.</p>	<p>Would meet policy objectives associated with development of renewable energy and reducing GHG emissions.</p>	<p>Stirling Dish Technology is the proprietary technology of Stirling Energy Systems, which filed for bankruptcy in September, 2011. As such, it is not currently commercially available. Two utility-scale projects were proposed to use this technology, and both have either been withdrawn or re-proposed using a different technology.</p>	<p>With a minimum size of nearly 4,500 acres for 500 MW, Stirling Dish Technology would increase the footprint of the DQSP and, due to the greater height of this technology, also would increase visual impacts relative to the Proposed Action.</p>
<p><i>Solar Power Tower Technology</i></p> <p>A flat mirror "heliostat" system that tracks the sun and focuses solar energy on a central receiver at the top of a high tower. The focused energy is used to heat a transfer fluid to produce steam and run a central power generator.</p>	<p>Would not meet BLM's purpose and need to respond to an application for a solar PV facility on public lands.</p>	<p>Would meet policy objectives associated with development of renewable energy and reducing GHG emissions.</p>	<p>This technology has been approved and is operating on BLM lands, but more recent project applications have faced significant public opposition. There are no active applications pending before BLM for projects using this technology.</p>	<p>No substantial reduction in impacts would occur under this technology. The large area needed for a solar power tower plant would exceed the land requirement for the DQSP, and the height of the heliostats would increase visual impacts relative to the Proposed Action, the heliostats could cause impacts to air traffic at the Blythe Airport, and the combination of the tower and heliostats would have a greater impact on avian species.</p>

Table 2-8. Other Types of Energy Projects Eliminated from Detailed Analysis

Alternative	Responsiveness to Purpose and Need	Meets Policy Objectives	Feasibility	Environmental Criteria
<p><i>Linear Fresnel Technology</i></p> <p>Uses long parallel rows of flat mirrors to focus the sun's energy onto elevated receivers, which consist of a system of tubes through which water flows. The concentrated sunlight boils the water, generating high-pressure steam for direct use in power generation and industrial steam applications.</p>	<p>Would not meet BLM's purpose and need to respond to an application for a solar PV facility on public lands.</p>	<p>Would meet policy objectives associated with development of renewable energy and reducing GHG emissions.</p>	<p>Ausra operates a 5 MW plant in Bakersfield. There is no indication that the company, which has changed its focus to medium-sized (50 MW) solar steam generating systems, would be available or interested in developing a project with sufficient capacity to take the place of the Proposed Action.</p>	<p>Solar thermal technologies generally require water use, as well as project structures which have greater visual impacts than PV projects.</p>
<p><i>Parabolic Trough Technology</i></p> <p>Uses a series of parabolic-shaped mirrors to focus sunlight on a pipe containing a thermal fluid. The fluid flows to a central power plant which uses a steam cycle to generate electricity.</p>	<p>Would not meet BLM's purpose and need to respond to an application for a solar PV facility on public lands.</p>	<p>Would meet policy objectives associated with development of renewable energy and reducing GHG emissions.</p>	<p>This technology has been approved and is operating on BLM lands.</p>	<p>Solar thermal technologies generally require water use, as well as project structures which have greater visual impacts than PV projects.</p>

Table 2-8. Other Types of Energy Projects Eliminated from Detailed Analysis

Alternative	Responsiveness to Purpose and Need	Meets Policy Objectives	Feasibility	Environmental Criteria
<p><i>Distributed Solar Generation</i></p> <p>Uses small, modular power generators, typically up to 50MW, located at or near customer demand.</p>	<p>Would not meet BLM’s purpose and need to respond to an application for a solar PV facility on public lands.</p>	<p>Would not meet BLM’s renewable energy goals, as there are limited, if any, disturbed public lands where BLM might co-locate a distributed generation project of equivalent size.</p>	<p>To be a viable alternative to the DQSP, there would have to be sufficient newly installed solar panels to generate 450 MW of capacity. The rate of PV manufacturing and installation is expected to continue to grow and larger distributed solar PV installations are becoming more common. California has approximately 40 million square feet (approximately 920 acres) of distributed solar. An additional approximately 90 million square feet (approximately 2,100 acres) would be required to provide 450 MW. In addition to planning and permitting barriers, replacing the action alternatives with a DG solar energy alternative would be speculative based on existing limitations on the integration of DG into the electric grid. The present electric grid, built decades ago, was based on a centralized generation approach and was not designed to handle high levels of distributed renewable energy systems.</p>	<p>Distributed sources may allow some portion to be constructed on previously disturbed areas, thus reducing land overall land use of undisturbed sites.</p>
<p><i>Wind Power</i></p>	<p>Would not meet BLM’s purpose and need to respond to an application for a solar PV facility on public lands.</p>	<p>Would be inconsistent with BLM’s prior programmatic determination that the Project site is most suitable for solar development.</p>	<p>The BLM manages 20.6 million acres of public lands with wind potential. The BLM has authorized 198 ROWs for the use of public lands for wind energy site testing or development. Of these, 29 authorizations have a total installed capacity of 437 MW.</p>	<p>Wind energy projects could cause significant impacts to biological, visual, cultural, water, and soils resources. Accordingly, these alternatives would not reduce impacts relative to the Proposed Action.</p>

Table 2-8. Other Types of Energy Projects Eliminated from Detailed Analysis

Alternative	Responsiveness to Purpose and Need	Meets Policy Objectives	Feasibility	Environmental Criteria
<i>Geothermal Power</i>	Would not meet BLM's purpose and need to respond to an application for a solar PV facility on public lands.	Would be inconsistent with BLM's prior programmatic determination that the Project site is most suitable for solar development.	Of the geothermal producing leases managed by the BLM nationally, 59 leases generate about 1,275 MW of installed geothermal energy. The 2008 programmatic EIS relating to BLM's authorization of geothermal leasing estimates a potential for 5,540 MW of new electric generation capacity from 111 new geothermal power plants in 12 western states, and an additional 6,600 MW from another 133 plants by 2025. In California, 14 parcels have been competitively leased. However, geothermal energy production would not be a feasible alternative use for the public land identified in the ROW application given that there are no known geothermal resources in the area.	If a geothermal power project were feasible it would reduce effects on air quality, and cultural and biological resources as geothermal power projects use less land; however, they can cause visual impacts and produce waste and byproducts such as hydrogen sulfide that can have impacts on air quality. Spills of geothermal fluids when pipes break can lead to soil and groundwater contamination.
<i>Biomass</i>	Would not meet BLM's purpose and need to respond to an application for a solar PV facility on public lands.	Would not meet BLM's or the County's objectives to meet Federal and state renewable energy development goals.	Most biomass facilities produce only small amounts of electricity (in the range of 3 to 10 MW) and so could not produce an amount of energy necessary to replace the DQSP. Thus, it would be technically infeasible at the scale required to replace the DQSP.	Biomass facilities generate significant air emissions especially short-lived climate pollutants such as methane, and require numerous truck deliveries to supply the plant with the waste. Other environmental concerns associated with biomass relate to the emission of toxic chemicals, such as dioxin, and the disposal of the toxic ash that results from biomass burning. Accordingly, these alternatives would not reduce impacts relative to the Proposed Action.

Table 2-8. Other Types of Energy Projects Eliminated from Detailed Analysis

Alternative	Responsiveness to Purpose and Need	Meets Policy Objectives	Feasibility	Environmental Criteria
<i>Tidal Energy</i>	Would not meet BLM's purpose and need to respond to an application for a solar PV facility on public lands.	Would not meet BLM's or the County's objectives to meet Federal and state renewable energy development goals.	The use of tidal fence technology is limited to areas that are adjacent to body of water with a large difference between high and low tides (unlike the proposed site). In-flow tidal turbines are a relatively new technology, unproven at the scale that would be required to replace the DQSP.	Tidal energy alternatives could create significant environmental impacts to ocean ecosystems.
<i>Wave Energy</i>	Would not meet BLM's purpose and need to respond to an application for a solar PV facility on public lands.	Would not meet BLM's or the County's objectives to meet Federal and state renewable energy development goals.	The use of wave energy technology is limited to areas that are adjacent to body of water with significant wave action (unlike the proposed site). Because wave energy technology is new, it is not known whether it would be technologically feasible at the scale required to replace the DQSP.	If a wave energy project were feasible, aesthetic, biological resource, vessel traffic, and recreation impacts may increase. There would also be potential impacts on the size and amount of waves with possible effects to beaches (e.g., changes to sediment transport processes).
<i>Natural Gas</i>	Would not meet BLM's purpose and need to respond to an application for a solar PV facility on public lands.	Would not meet BLM's or the County's objectives to meet Federal and state renewable energy development goals.	Technically feasible.	Air quality impacts would increase as a result of operational emissions of short-lived climate pollutants, e.g., methane, from the power plant. Impacts would occur off site from construction of natural gas and water supply lines resulting in potentially greater impacts to air quality, biological, cultural, groundwater, hazardous materials, land use, utilities, and visual resources.

Table 2-8. Other Types of Energy Projects Eliminated from Detailed Analysis

Alternative	Responsiveness to Purpose and Need	Meets Policy Objectives	Feasibility	Environmental Criteria
<i>Coal</i>	Would not meet BLM’s purpose and need to respond to an application for a solar PV facility on public lands.	Would not meet BLM’s or the County’s objectives to meet Federal and state renewable energy development goals.	Technically feasible.	Impacts associated with air quality, greenhouse gas, and health risks would increase substantially. Impacts would also occur from transportation of coal to the power plant. Impacts would occur off site from construction of a water supply line resulting in potentially greater air quality, biological, cultural, groundwater, land use, utilities, and visual resources impacts.
<i>Nuclear Energy</i>	Would not meet BLM’s purpose and need to respond to an application for a solar PV facility on public lands.	Would not meet BLM’s or the County’s objectives to meet Federal and state renewable energy development goals.	The permitting of new nuclear facilities in California is currently illegal, so the implementation of this technology would be legally infeasible.	Greater impacts would result from a nuclear power plant, including the impacts from the need for obtaining large quantities of water at the project site.
<i>Conservation and Demand-Side Management</i> Consists of a variety of approaches to reduce electricity use, including energy efficiency and conservation, building and appliance standards, and load management and fuel substitution.	Would not meet BLM’s purpose and need to respond to an application for a solar PV facility on public lands.	Would not meet BLM’s or the County’s objectives to meet Federal and state renewable energy development goals.	Energy conservation is an active goal handled by local utilities and the state, but ongoing growing demand and the state’s renewable energy initiatives will still require development of additional generating capacity.	Would reduce effects on all environmental resources.

CHAPTER 3 AFFECTED ENVIRONMENT

3.1 Introduction

As discussed in Section 1.9, the Draft PA/EIS/EIR has been modified to respond to public comments, incorporate newly acquired data, and streamline the environmental review process, as required by Executive Order 13807 and Secretary's Order 3355. The bulk of these changes took place within Chapter 3. Introductory text which only summarized the purpose of each subsection, and text which repeated project description information already provided in Chapter 2, has been deleted. In addition, encyclopedic, regional, and background information in Chapter 3 which was not directly relevant to onsite resources and/or impacts has been moved to Appendix D. In the Draft PA/EIS/EIR, Appendix D included only the regulations, plans, and policies, including Federal, state, and local laws, related to each resource topic analyzed in the document. In the Final PA/EIS/EIR, regional and background affected environment text which is not directly relevant to onsite resources has been removed from Chapter 3 and moved to Appendix D.

3.2 Air Resources

Ambient Air Quality Data

The Proposed Action and Alternatives are located within the MDAQMD. A summary of the various emission sources that contribute to ambient air quality in the Project area is presented in Tables 4.2-11 and 4.2-12 in Section 4.2.6.

Ambient air concentrations of pollutants are measured at monitoring stations in Riverside and San Bernardino counties operated by CARB and/or MDAQMD. Table 3.2-1 presents ambient air quality data for the region from 2011 to 2016. Due to the remote location, no monitoring stations with complete data sets are close to the Project site, except for the 445 West Murphy Street monitoring station at Blythe with data for ozone. PM₁₀, PM_{2.5}, NO₂, and CO data are from the Palm Springs Fire Station monitoring station (105 miles distant, and in the Salton Sea Air Basin); and SO₂ data are from the Victorville-14306 Park Avenue monitoring station (160 miles distant). The air quality monitoring data were compared to the most stringent applicable standards for the years 2011 through 2016 at the most representative monitoring stations for each pollutant.

According to the NECO Plan Amendment to the CDCA Plan, the ozone standard is exceeded due to long-distance transport of pollutants from the Los Angeles Basin. In contrast the PM₁₀ exceedance is due to natural sources occurring with various land uses found in a desert environment. These uses include OHV use, mining, crop agricultural, and livestock grazing. The PM₁₀ concentrations are from fugitive dust emission sources, rather than from combustion particulate or secondary particulate emission sources (BLM 2002).

Table 3.2-1. Summary of Available Air Quality Data for the Project Area (2011 to 2016)

Pollutant	Parameter	2011	2012	2013	2014	2015	2016
Ozone	Days above 1-hr CAAQS (0.09 ppm)	0	0	0	0	0	0
	Days above 8-hr CAAQS (0.070 ppm)	0	12	0	16	0	0
	Days above 8-hr NAAQS (was 0.075 ppm during 2011 to 2013, 0.70 after 2013)	0	9	0	12	0	ND
Nitrogen dioxide (NO ₂)	Days above the CAAQS (180 ppb)	0	0	0	0	0	0
	Days above the NAAQS (100 ppb)	0	0	0	0	0	0
Respirable Particulate matter less than or equal to 10 microns in diameter (PM ₁₀)	Days above CAAQS (50 µg/m ³)	0	0	2	2	2	ND
	Days above NAAQS (150 µg/m ³)	2	0	1	1	1	1
Fine particulate matter less than or equal to 2.5 microns in diameter (PM _{2.5})	Days above NAAQS (35 µg/m ³)	0	0	0	0	0	0

Table 3.2-1. Summary of Available Air Quality Data for the Project Area (2011 to 2016)

Pollutant	Parameter	2011	2012	2013	2014	2015	2016
Carbon monoxide (CO)	Days above the CAAQS (9.0 ppm)	0	0	0	0	ND	ND
	Days above the NAAQS (9 ppm)	0	0	0	0	ND	ND

Notes:

ND = no data available.

Monitoring data from USEPA and ARB monitoring databases <http://www.epa.gov/airdata/> and <http://www.arb.ca.gov/adam/>.

O₃ data are from Blythe; PM₁₀, PM_{2.5}, NO₂, and CO data are from Palm Springs. SO₂ data not available.

Source: CARB 2018.

Attainment Status

Areas that do not meet the NAAQS or CAAQS for a given criteria pollutant are designated as “non-attainment areas” by the USEPA and/or the CARB. Further classifications are given to non-attainment areas to identify the severity and number of violations experienced, and the year in which attainment is anticipated based on implementation of attainment plans. In circumstances where ambient data is not sufficiently available to support designation as either attainment or non-attainment, the area can be designated as “unclassified”. An unclassified area is normally treated by the USEPA in the same way as an attainment area for regulatory purposes.

Table 3.2-2 summarizes the site area's attainment status for various applicable state and Federal standards. The air basin for the Project area is considered an unclassified/attainment area for all of the NAAQS. The air basin is considered a non-attainment area for the CAAQSs for O₃ and PM₁₀. The air basin is considered “unclassified/attainment” for all other CAAQS.

Table 3.2-2. Federal and State Attainment Status for the Mojave Desert Air Basin within Riverside County

Pollutant	Attainment Status ^a	
	Federal	State
Ozone	Unclassified/Attainment ^b	Non-attainment
CO	Unclassified/Attainment	Unclassified
NO ₂	Unclassified/Attainment ^c	Attainment
SO ₂	Unclassified	Attainment
PM ₁₀	Unclassified/Attainment ^b	Non-attainment
PM _{2.5}	Unclassified/Attainment	Unclassified

Notes:

a - Attainment = Attainment or Unclassified, where Unclassified is treated the same as Attainment for regulatory purposes.

b - Attainment status for the Mojave Desert Air Basin within Riverside County only, not the entire air basin. For ozone, the attainment level is for the old standard of 0.075 ppm, not the new standard of 0.070 ppm (effective December 28, 2015)

c - Nitrogen dioxide attainment status for the new Federal 1-hour NO₂ standard was determined on February 29, 2012.

Source: CARB 2015b, USEPA 2015a, USEPA 2015c.

Sensitive Receptors

For the purposes of this air quality analysis, sensitive receptors are defined as facilities and land uses that include members of the population that are particularly sensitive to the effects of air

pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals, and daycare centers. Schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because children, elderly people, and the infirm are more susceptible to respiratory distress and other air quality-related health problems than the general public. Residential areas are considered sensitive to poor air quality because people usually stay home for extended periods of time, which results in greater exposure to ambient air quality.

The site is located in proximity to rural agricultural lands, undeveloped lands, uses associated with the Blythe Airport, power generation, local roads, and interstate highway and other non-sensitive uses. No schools, hospitals, convalescent homes or any other sensitive receptors are located within one mile of the proposed Project. The closest residence (apparent occupied mobile home trailer) is located approximately 3,700 feet north of the northeast corner of the Project boundary. The next two closest sensitive air quality receptors are located in the residential community of Nicholls Warm Springs/Mesa Verde approximately 4,800 feet north of the northeast corner of the Project site boundary.

3.3 Biological Resources – Vegetation

This discussion is based primarily upon information from these sources:

1. Biological Resources Technical Report (Ironwood 2016, provided in Appendix M) and Western EcoSystems Technology memorandum (WEST 2018a, also included in Appendix M);
2. Identification and Delineation of Areas Potentially Subject to Jurisdiction Under the California Department of Fish and Wildlife Lake and Streambed Alteration Agreement Program (Huffman-Broadway Group 2017, provided in Appendix N).
3. Investigation of the Presence of Corps and US EPA Jurisdictional Waters (Huffman-Broadway Group 2015, provided in Appendix I).
4. California Natural Diversity Database (CDFW 2016);
5. NECO Plan Amendment to the CDCA Plan (BLM 2002);
6. Consortium of California Herbaria (Consortium of California Herbaria 2012); and
7. All BLM California Special Status Plants (BLM 2015).

Generally, the Study Area for vegetation resources included a 5,045-acre area consisting of public lands administered by the BLM (4,885 acres) and private land under the land use jurisdiction of Riverside County (160 acres) (Figure 3.3-1). The privately-owned portion of the Study Area is generally referred to herein as the “160-acre private inholding.” Inventories of individual special-status species, succulent plant species (cacti), and nonnative invasive species were limited to within the 5,045-acre Study Area.

The Study Area is located in the Colorado Desert. The Colorado Desert is a part of the larger Sonoran Desert, which extends across the southwest United States and into Mexico. The climate is very hot and dry in the summer months, and mild in the winter.

The Study Area is specifically located on the Palo Verde Mesa on the west bank of the Colorado River. The Study Area is relatively flat and ranges in elevation from approximately 330 feet above mean sea level (amsl) at the southeast corner to 475 feet amsl in the northwest (USGS 1983). The Study Area is near the McCoy Mountains on the north, the Mule Mountains on the southwest, and the Colorado River on the east. Surface water is ephemeral on Palo Verde Mesa and consists of limited seasonal and perennial sources. The closest perennial water is the Colorado River, which lies approximately 10 miles east of the eastern edge of the Study Area.

The 160-acre private inholding, which is surrounded on all sides by BLM land, was previously a jojoba farm. Rows of jojoba (*Simmondsia chinensis*), a species native to the region, were planted in a north-south orientation at approximately 4 meter spacing. These rows are slightly raised to cover the buried three-fourths inch perforated irrigation pipe running their entire length. There is a wellhead and some debris remaining at the northeast corner entrance to the site. Of the thousands of jojoba that were planted about one third currently survive without any maintenance. However, the health of the existing plants is diminished; most are dying-back from their center outwards but a few are still flowering and fruiting. Since abandonment, native vegetation seems to be recovering slowly.

Generally, the Study Area is dominated by desert scrub vegetation. In total, 124 plant species were detected in the Study Area during botanical field surveys. Of this total, 114 species are native, while 10 species are nonnative. Vegetation alliances, special-status plant species, cacti, and noxious weeds documented during botanical field surveys are discussed further in the following subsections.

3.3.1 Vegetation Alliances

Information used to support the analysis of vegetation alliances includes:

- Site-specific mapping of vegetation alliances by BLM;
- Vegetation cover maps used to support the DRECP;
- Site-specific vegetation and sand deposit mapping conducted by the Applicant; and
- Other sources available in the scientific literature.

Vegetation alliances were characterized by the BLM using the vegetation classification system used for the DRECP following Federal Geographic Data Committee (FGDC) and National Vegetation Classification Standards (NVCS). The vegetation alliances are shown in Figure 3.3-2, and the acreage of each alliance in the project area is shown in Table 3.3-1.

Table 3.3-1. Vegetation Alliances and Cover Types within Project Application Area

Vegetation Alliance	Acreage Within the Project Application Area
Anthropogenic areas of Little or No Vegetation	6.83
Built-up & Urban Disturbance	44.3
<i>Chorizanthe rigida</i> – <i>Geraea canescens</i> Desert Pavement Sparsely Vegetated	17.6
<i>Larrea tridentata</i>	2,922
<i>Larrea tridentata</i> – <i>Ambrosia dumosa</i>	1,893
<i>Parkinsonia florida</i> – <i>Olneya tesota</i>	13.8
<i>Pleuraphis rigida</i>	171.4
Woody Agriculture (orchards, vineyards)	161

***Chorizanthe rigida* – *Geraea canescens* Desert Pavement Alliance**

The *Chorizanthe rigida* – *Geraea canescens* Desert Pavement Alliance, commonly known as Rigid spineflower – hairy desert sunflower, is found on the northern edge of the application area. The alliance covers approximately 17.6 acres (0.3 percent) of the Project application area. As discussed in Section 1.1, the total Project area under application for BLM and County approval is approximately 5,275 acres, but the Project proposed by the Applicant would occupy approximately 3,770 acres of the total application area. The *Chorizanthe rigida* – *Geraea canescens* Desert Pavement Alliance occurs within the application area, but outside of the area proposed for development, approximately one mile north of the gen-tie line.

***Larrea tridentata* and *Larrea tridentata*-*Ambrosia dumosa* Alliances**

The *Larrea tridentata* alliance, commonly known as creosote bush scrub and *Larrea tridentata*-*Ambrosia dumosa* alliance, commonly known as creosote bush – white bursage scrub, are the dominant vegetation alliances, covering approximately 4,815 acres (92 percent) of the overall

Project application area. Other species include Cheesebush (*Ambrosia salsola*), brittlebush (*Encelia farinosa*), Emory's indigo bush (*Psoralea emoryi*), big galleta grass (*Hilaria rigida*), and occasional cacti. These alliances are sparsely vegetated with widely scattered relatively low-growing individual shrubs. No creosote rings were reported by BLM, or in Ironwood (2016).

Sparse creosote bush (*Larrea tridentata*) was observed throughout the 160-acre private inholding and on the surrounding berms. These plants are probably re-growth from old root crowns, but some smaller new plants have taken hold. Other common native perennials appearing occasionally on the 160-acre private inholding include white bursage (*Ambrosia dumosa*) and brittlebush (*Encelia farinosa*). Native annual plants recolonizing the site include desert pincushion (*Chaenactis stevioides*), brown-eyed primrose (*Chylismia claviformis*), narrowed-leaved popcorn flower (*Cryptantha angustifolia*), chuckwalla combseed (*Pectocarya heterocarpa*), Harwood's milkvetch (*Astragalus insularis* var. *harwoodii*), dwarf white milkvetch (*A. didymocarpus*), stigose bird's-foot trefoil (*Acmispon strigosus*), and hairy desert sunflower (*Gerea canescens*).

These alliances are not designated as sensitive plant communities by BLM (NECO Plan) and both have a State Rarity rank of S5, meaning that they are commonly found throughout their historic range.

***Parkinsonia florida-Olneya tesota* Alliance**

The *Parkinsonia florida-Olneya tesota* alliance is commonly known as blue palo verde-ironwood woodland alliance. The alliance covers approximately 13.8 acres (0.3 percent) of the overall Project application area. The occurrence of the *Parkinsonia florida-Olneya tesota* alliance in the Project area is limited to the northeastern corner, adjacent to the NRG Blythe PV Project.

Like the *Chorizanthe rigida – Geraea canescens* Desert Pavement Alliance, the *Parkinsonia florida-Olneya tesota* alliance occurs within the application area, but outside of the area proposed for development. However, it is directly on the boundary of the Project area, within less than 100 feet of the Project. The area is adjacent to the Palowalla Sand Migration Zone (SMZ) mapped by Kenney (2017), and was mapped by Kenney (2017) as critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems. The area is also mapped as the FP1 active watercourse, a state jurisdictional water covering 34.14 acres, in Huffman-Broadway (2017).

The *Parkinsonia florida-Olneya tesota* alliance has a state rarity rank of S4.2, which is limited in distribution and moderately threatened in California. Blue palo verde-ironwood woodland is identified in DRECP as microphyll woodland, which is considered a Special Vegetation Feature, and is subject to Conservation and Management Actions (CMAs) under the DRECP. Although the Project is not subject to land use planning decisions in the DRECP, identification of the extent of impacts to the microphyll woodland assists in understanding the significance of the impacts of the Proposed Action and the alternatives.

***Pleuraphis rigida* Alliance**

The *Pleuraphis rigida* alliance, commonly known as big galleta shrub-steppe, is found along the northern Project boundary, approximately coincident with the Project gen-tie corridor. The alliance covers approximately 171.4 acres (3.3 percent) of the overall Project application area. Big galleta (*Hilaria rigida*) is a densely branched perennial bunch grass that occurs locally on sand

sheets and dunes. Co-dominants are widely scattered creosotes (*Larrea tridentata*), with occasional occurrences of Emory's indigo bush (*Psoralea emoryi*), desert wire lettuce (*Stephanomeria pauciflora*), fan-leaved tiquilia (*Tiquilia plicata*) and desert dicoria (*Dicoria canescens*). Dense infestations of the invasive weed Saharan mustard (*Brassica tournefortii*) are evident on many areas of this vegetation type.

The *Pleuraphis rigida* alliance has a state rarity rank of S2.2, which is moderately threatened in California.

3.3.2 Sand Dunes

As shown in Figure 3.3-2, the Project area is mapped as occurring within a regional sand corridor, which is the “Dunes/Sand” feature shown on DRECP Figure D-15.

Downwind Resources

The Project area is situated near the far eastern, downwind end of the regional Dale Lake-Palen-Ford system, and sand deposits on the site are primarily sourced from alluvial deposits in Wiley's Well Wash, which enters the Dale Lake-Palen-Ford system from the south about four miles west of the Project area. Local-scale mapping suggests that the sand corridor feature may not actually extend to the edge of the Palo Verde Mesa, as is shown on Figure 3.3-2. Mapping by Stone (2006), Hayhurst and Bedrossian (2010), Lancaster (2014), Ironwood (2016), and Kenney (2017) shows that the eolian deposits largely dissipate as they approach the Project area from the west. These maps do not show eolian deposits on the eastern half of the site or further to the east. The Palo Verde Valley, the area between the Project and the Colorado River, may once have been the ultimate depository for sand transport in the Palen-Ford corridor. If so, any sand deposited in this valley would likely have been routinely reworked and transported downstream during floods on the river, or obscured by agricultural activity in the valley. Therefore, the Project area itself does not contribute sand to dunes located further eastward.

Onsite Sand Deposits

Eolian deposits in the Project area have been mapped on both a regional scale and local scale by five separate researchers, including Stone (2006), Hayhurst and Bedrossian (2010, a compilation from previous sources), Ironwood (soils and vegetation mapped in 2012, but reported in the BRTR in 2016), Lancaster (2014), and Kenney (2017). A general correlation of the mapped units between these sources is shown in Table 3.3-2. The geologic map of the site shown in Figure 3.7-1 is based on Stone (2006), but all five studies are consistent in showing the Project area to be composed of a mixture of eolian and alluvial deposits. The maps also generally agree on the distribution of each type of deposit. These maps show that deposits dominated by eolian processes are found only in the western and northern edges of the Project area. Based on Kenney (2017), these deposits occupy only about 7.5 percent of the Project area. The remainder of the Project area is occupied by deposits dominated by alluvial processes.

Table 3.3-2. General Correlation Between Different Source Maps for Alluvial and Eolian Deposit Information

General Age	Deposit Type	Stone 2006	Hayhurst and Bedrossian 2010	Ironwood 2016	Lancaster 2014	Kenney 2017
Holocene	Eolian	Qs	Qe	Sand dune	Qe Qye	Qe-ds Qe-de
Holocene	Alluvial	Qa6 (100 to 2,000 years old)	Qf (late Holocene)	Sonoran Creosote bush scrub	Qyf (late Pleistocene and Holocene)	Qal
Pleistocene	Alluvial	Qpv	Qot (old terrace deposits, late to middle Pleistocene)		Qoa (Pleistocene)	

Onsite Sand Sources

In addition to mapping eolian sand deposits, Kenney (2017) mapped areas that were identified as critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems. These areas are typically relatively flat ponding areas found at the ends of desert washes. Alluvial sands are deposited in these areas through stormwater erosion in the surrounding mountains. When the areas dry, the sand deposits are subject to wind erosion and transport to dune areas.

Detailed maps of the eolian deposits on the site are shown in Plates 3 and 6a of Kenney 2017 (Appendix O). The Palowalla SMZ is not specifically indicated on Plate 6a, but Plate 3a shows that it is associated with the light blue area surrounding the west wide of the NRG Blythe PV Project (identified as “Blythe 21 Solar Facility” on the Plate). This area is referred to as a ponding area by Kenney (2017), and the limits of the area were mapped by Huffman-Broadway (2017) using ponding indicators such as desiccation cracks. This ponding area is also mapped as the *Parkinsonia florida-Olneya tesota* alliance by BLM in Figure 3.3-2, and as the FP1 active watercourse, a state jurisdictional water, in Huffman-Broadway (2017). The Palowalla SMZ is known to be currently active, having been formed within the past 150 years as a result of diversion of stormwater flow from the McCoy Mountains underneath Interstate 10. The drainage ends at this ponding area, which itself has been modified in recent years by the construction of the NRG Blythe PV Project (Kenney 2017).

3.3.3 Special-Status Plants

Special-status plants are those species that have been afforded special recognition by Federal, state, or local resource agencies or organizations. Special-status species are of relatively limited distribution and typically require unique habitat conditions. For the purposes of this Final PA/EIS/EIR, special-status plant species are defined as meeting one or more of the following criteria:

1. Listed as threatened or endangered or candidates for future listing as threatened or endangered under the Federal Endangered Species Act (FESA) or California Endangered Species Act (CESA);
2. Designated as BLM Sensitive; or

3. For non-BLM lands, considered by the CNPS to be “rare, threatened, or endangered in California” (CNPS Rank 1A, 1B, and 2) as well as CNPS Rank 3 and 4 plant species.

A list of 33 special-status plant species with potential to occur within the vicinity of the Study Area was generated by searching multiple databases and reference sources for occurrence records. Rare plant surveys were conducted on BLM lands in Fall 2012 (September 11 to 19, 2012), Spring 2013 (March 18 to 30, 2013), and Spring 2017 (May 9 to 14, 2017), and on the private inholding in Spring 2015 (March 10 to 12, 2015). Drought conditions occurred in Fall 2014 to Spring 2015, but the Spring 2015 surveys reported moist soil at a depth of three inches. As a result, it was determined that the localized winter rainfall for each rare plant survey was sufficient to germinate abundant annual blooms, and timing was sufficient for observing and identifying all potentially occurring target plants.

Six of the 33 special-status plant species were documented during rare plant surveys conducted between Fall 2012 and Spring 2015 (Table 3.3-3; Figure 3.3-3). These include Harwood's milkvetch (*Astragalus insularis* var. *harwoodii*), Abrams' spurge (*Euphorbia abramsiana*), Utah vine milkweed (*Funastrum utahense*), ribbed cryptantha (*Cryptantha costata*), Harwood's eriastrum (*Eriastrum harwoodii*), and desert unicorn-plant (*Proboscidea altheifolia*). None of these special-status plant species are Federally- or state-listed under FESA or CESA. Harwood's eriastrum is designated as BLM Sensitive. Special-status species documented within the Study Area are described further below.

Table 3.3-3. Special-Status Plant Species Evaluated for Potential Occurrence within the Study Area

Common Name	Scientific Name	Status (State/Federal/BLM/CNPS) ^a	Potential for Occurrence within Study Area
Chaparral sand verbena	<i>Abronia villosa var. aurita</i>	-/-/BLM Sensitive/1B.1	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Angel trumpets	<i>Acleisanthes longiflora</i>	-/-/-2B.3	ABSENT. No suitable habitat onsite (rocky carbonate canyon bottoms).
Harwood's milk-vetch	<i>Astragalus insularis var. harwoodii</i>	-/-/-2B.2	PRESENT. 26,370 individuals estimated on site.
Borrego milk-vetch	<i>Astragalus lentiginosus var. borreganus</i>	-/-/-4.3	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Coachella Valley milk-vetch	<i>Astragalus lentiginosus var. coachellae</i>	-/FE/-/1B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Gravel milk-vetch	<i>Astragalus sabulorum</i>	-/-/-2B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Pink fairy duster	<i>Calliandra eriophylla</i>	-/-/-2B.3	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Saguaro	<i>Carnegia gigantean</i>	-/-/-2.B.2	PRESUMED ABSENT. Not found during surveys, little potential habitat on site.
Emory's crucifixion thorn	<i>Castela emoryi</i>	-/-/-2B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Abrams' spurge	<i>Chamaesyce abramsiana</i>	-/-/-2B.2	PRESENT. 2,104 individuals estimated on site.
Parry's spurge	<i>Chamaesyce parryi</i>	-/-/-2B.3	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Flat-seeded spurge	<i>Chamaesyce platysperma</i>	-/-/BLM Sensitive/1B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys. No predicted occupied habitat present onsite in DRECP model.
Las Animas colubrina	<i>Colubrina californica</i>	-/-/-2B.3	ABSENT. Not found during surveys; no potential habitat on site (rocky wash bottoms & margins).
Foxtail cactus	<i>Coryphantha alversonii</i>	-/-/-4.3	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Ribbed cryptantha	<i>Cryptantha costata</i>	-/-/-4.3	PRESENT. 64,234 individuals estimated on site.
Glandular ditaxis	<i>Ditaxis claryana</i>	-/-/-2B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.

Table 3.3-3. Special-Status Plant Species Evaluated for Potential Occurrence within the Study Area

Common Name	Scientific Name	Status (State/Federal/BLM/CNPS) ^a	Potential for Occurrence within Study Area
California ditaxis	<i>Ditaxis serrata var. californica</i>	-/-/3.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Harwood's eriastrum	<i>Eriastrum harwoodii</i>	-/-/BLM Sensitive/1B.2	PRESENT. 956 individuals estimated on site. Predicted occupied habitat present onsite in DRECP model.
Utah vine milkweed	<i>Funastrum utahense</i>	-/-/4.2	PRESENT. 1 individual found on site.
Algodones Dunes sunflower	<i>Helianthus niveus ssp. Tephrodes</i>	SE/-/BLM Sensitive/1B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
California satintail	<i>Imperata brevifolia</i>	-/-/BLM Sensitive/2B.1	ABSENT. No suitable habitat on site (moist river plains and canal margins).
Bitter hymenoxys	<i>Hymenoxys odorata</i>	-/-/BLM Sensitive/2B.1	ABSENT. No suitable habitat on site (moist river margins and benches).
Crown-of-Thorns	<i>Koeberlinia spinosa ssp. Tenuispina</i>	-/-/2B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Graham's fishhook cactus	<i>Mammillaria grahamii var. grahamii</i>	-/-/2B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Darlington's blazing star	<i>Mentzelia puberula</i>	-/-/2B.2	ABSENT. No potential habitat present on site (rocky limestone and granite slopes).
Wiggins' cholla	<i>Opuntia wigginsii</i>	-/-/3.3	PRESUMED ABSENT. Potential habitat occurs on site but not found during surveys.
Desert beardtongue	<i>Penstemon pseudospectabilis ssp. Speudospectabilis</i>	-/-/2B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys
Lobed ground cherry	<i>Physalis lobata</i>	-/-/2B.3	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Desert portulaca	<i>Portulaca halimoides</i>	-/-/4.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.
Desert unicorn-plant	<i>Proboscidea althaeifolia</i>	-/-/4.3	PRESENT. 811 individuals estimated on site.
Dwarf germander	<i>Teucrium cubense ssp. depressum</i>	-/-/2B.2	PRESUMED ABSENT. Marginal habitat present on site but not found during surveys.
Jackass clover	<i>Wislizenia refracta ssp. refracta</i>	-/-/2B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.

Table 3.3-3. Special-Status Plant Species Evaluated for Potential Occurrence within the Study Area

Common Name	Scientific Name	Status (State/Federal/BLM/CNPS) ^a	Potential for Occurrence within Study Area
Palmer's jackass clover	<i>Wislizenia refracta ssp. palmeri</i>	-/-/2B.2	PRESUMED ABSENT. Potential habitat present on site but not found during surveys.

^a **Status Codes:**

Federal

FE = Federally listed, endangered: species in danger of extinction throughout a significant portion of its range

FT = Federally listed, threatened: species likely to become endangered within the foreseeable future

State

SE = State listed as endangered

ST = State listed as threatened

R = State characterized as rare

BLM

BLM Sensitive = Species that require special management consideration to avoid potential future listing under the FESA and that have been identified in accordance with procedures set forth in BLM Manual section 6840 (BLM 2008).

CNPS

California Rare Plant Rank (CRPR):

1A = Includes plants that are both presumed extirpated in California and either rare or extinct elsewhere

1B = Rare, threatened, or endangered in California and elsewhere

2A = Plants presumed extirpated in California but more common elsewhere

2B = Plants rare, threatened, or endangered in California, but more common elsewhere

3 = Plants which need more information

4 = Limited distribution – a watch list

Threat Ranks (follows a CRPR, where applicable):

0.1 = Seriously threatened in California (high degree/immediacy of threat)

0.2 = Fairly threatened in California (moderate degree/immediacy of threat)

0.3 = Not very threatened in California (low degree/immediacy of threats or no current threats known)

Harwood's Milkvetch

Large populations of Harwood's milkvetch were documented within the proposed solar facility during Spring 2013 rare plant surveys (Figure 3.3-4). The total estimated count during Spring 2013 surveys was 13,712 individuals. The species was distributed widely across most of the southern half of the Study Area, with concentrated populations along the disturbed berm surrounding the private inholding and some very shallow sand dunes and sand sheets at the southwest corner of the Study Area. The majority of the plants were in fertile condition, often both flowering and fruiting and there appeared to be a robust fruit and seed set in Spring 2013.

Harwood's milkvetch was also found distributed widely across the entire 160-acre private inholding during Spring 2015 rare plant surveys, with 26,370 individuals found (Figure 3.3-4). The inholding, being a fallow jojoba farm, supports a regular grid of shallow mounds and berms, providing micro-breaks in the flow of wind. Thus, there are opportunities for milkvetch seedpods to drop and accumulate anywhere within the inholding, leading to the large numbers of individuals counted during the survey. The linear distribution of Harwood's milkvetch waypoints as depicted on Figure 3.3-4 is an artifact of the mapping protocol. Actual distribution of this plant was patchy and evenly dispersed across the entire inholding with no evident pattern visually observed, except for its accumulation at breaks in the terrain from artificial berms. The species appears sometimes to profit from re-contouring the native terrain.

Abrams' Spurge

Abrams' spurge was documented as a few small occurrences and one large population during the Fall 2012 rare plant surveys (Figure 3.3-5). The total number of individuals was estimated to be approximately 2,104. The majority of these individuals exist as depauperate dwarf plants on a cracked-muddy flat at the southwest border of the Study Area. This species was not documented on the 160-acre private inholding during Spring 2015 rare plant surveys.

Utah Vine Milkweed

The species was documented within the region during rare plant surveys conducted for nearby solar projects. Approximately 5,180 individuals were documented on the MSEP site while 398 were documented on the Modified Blythe Solar Power Project (Modified BSPP) site.

One individual of Utah vine milkweed was observed within the Study Area during the Spring 2013 rare plant survey (Figure 3.3-6). This individual was located near the northern most border of the Study Area in a shallow runnel margin. This is an insignificant occurrence, especially with respect to large distributed populations found elsewhere in the vicinity of the Study Area (e.g., 5,180 individuals documented on the MSEP site and 398 individuals documented on the Modified BSPP site).

Ribbed Cryptantha

The species was documented within the region during rare plant surveys conducted for nearby solar projects. Approximately 1,715 individuals were documented on the MSEP site while 71,000 were documented on the Modified BSPP site.

Spring 2013 rare plant surveys documented approximately 64,234 individuals of ribbed cryptantha, exclusively on sandy areas of the Study Area. Some occurrences were so dense that the numbers of individuals were estimated systematically. Very dense populations were recorded along the gen-tie line and on sandy areas southwest of the exiting solar facility (Figure 3.3-7).

Two individuals of ribbed cryptantha were found during Spring 2015 rare plant surveys on the 160-acre private inholding (Figure 3.3-7). Both appear to be waifs and it is unlikely that they would promote establishment of larger populations on the inholding. This occurrence is insignificant when compared to the approximately 56,000 individuals found on deeper sandy areas of the Study Area.

Harwood's Eriastrum

The species was documented within the region during rare plant surveys conducted for nearby solar projects. Approximately 386 individuals were documented on the MSEP site approximately 7 miles north of the Project, while 2,134 were documented on the Modified BSPP site approximately 5 miles north of the Project. According to the CNDDDB, there are 14 records of Harwood's eriastrum within five miles of the Project site, and one occurrence that was recorded on the Project site prior to the rare plant surveys that were conducted in 2013 (CDFW 2016). There is predicted occupied habitat present onsite in the DRECP suitable habitat model.

Figure 3.3-8 shows the occurrences of Harwood's eriastrum identified in the Project area during the planning and analysis of the Project. This includes occurrences reported to the California Natural Diversity Database (CNDDDB) in 2010 and 2011, and occurrences identified in onsite surveys in 2013 and 2017.

Rare plant surveys for the Harwood's eriastrum, on 10 meter spacing, were conducted on the BLM portion of the Project area in Spring 2013. The results of these surveys documented 882 Harwood's eriastrum individuals within the Study Area; all were found exclusively on sandy areas of the gen-tie line and solar array area. Harwood's eriastrum appears to co-occur sympatrically with ribbed cryptantha, with similar substrate preferences and distribution, although in fewer numbers and more sporadically dispersed (Ironwood 2016).

Additional surveys, also on 10 meter spacing, were conducted on the private land parcel in Spring 2015. No occurrences were found (Ironwood 2016).

Although 2013 and 2015 had slightly higher than average rainfall, even higher rainfall in the winter of 2016/2017 prompted additional surveys in Spring 2017 (WEST 2018a). These surveys did not include the areas in which the species had been detected in 2013. Surveys were conducted at 60 meter spacing to identify suitable habitat. In locations where suitable habitat occurred, more detailed surveys were conducted at 10 meters spacing. The 2017 surveys identified occurrences in two locations in which the species had not been identified in 2013. One of these was a single individual in the central portion of the Project site, in a small sand deposit on the downwind side of a creosote bush. This single occurrence is located more than 0.5 miles from any other occurrences of the species. The second location was an occurrence of 73 individuals on sand dunes near the CRSS.

The entire Project area is included within the DRECP suitable habitat model for the species.

Desert Unicorn-Plant

The species was documented within the region during rare plant surveys conducted for nearby solar projects. Approximately 662 individuals were documented on the MSEP site while 1,687 were documented on the Modified BSPP site.

Approximately 811 individuals of desert unicorn-plant were documented during Fall 2012 rare plant surveys within the Study Area (Figure 3.3-9). The number of individuals is an estimate because sometimes a single root tuber might produce two to three above ground leaf rosettes, and closely spaced aboveground stems were counted as separate individuals. The species' distribution was found occasionally on shallow sand sheets, but was mostly seen in creosote bush scrub, on both loose sandy-gravelly soils, and silt deposit areas. It prefers shallow swales where summer monsoonal rainfall collects and soaks the soil. The largest concentrations of this plant were the silty outwash flats on the southwest border of the site, and on similar silt deposit areas near the existing solar facility.

3.3.4 Jurisdictional Waters and Wetlands

Field investigations were conducted to determine the extent of state jurisdictional waters and wetlands within the ROW application area during the spring of 2014 and fall of 2015 (Huffman-Broadway Group 2017). Investigations for Federal jurisdictional waters and wetlands were conducted during the spring of 2014 and 2015 (Huffman-Broadway Group 2015).

The state delineation identified the presence of areas potentially subject to CDFW jurisdiction under the Department's Lake and Streambed Alteration Agreement Program (California Fish and Game Code (FGC) Sections 1600-1616). The areas are shown on Figure 4.3-1, along with the overlap of the areas with the different alternative footprints. These areas are primarily on the northern extent of the Study Area, north of the sand dune area, and in the northeastern corner of the Study Area, immediately south of the existing NRG Blythe PV Power Plant. The acreage of the areas is presented in Table 3.3-4. The floodplain area, designated as FP1 is situated at the end of Palowalla Ditch, roughly corresponds to the *Parkinsonia florida-Olneya tesota* vegetation alliance mapped by BLM, and as a ponding area that is critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems by Kenney (2017). Specific impacts to this area are discussed in Section 4.3.1.1.

Table 3.3-4. Summary of CDFW Jurisdictional Watercourses in Study Area¹

Type of Watercourse	Linear Distance in Study Area	Acres in Study Area
Active Channel	5,744 ft	0.13
Dormant Channel	6,778 ft	0.16
Abandoned Channel ²	45,189 ft	1.04
Active Floodplain ³	NA	Watercourse FP1 – 34.14 acres
		Watercourse FP2 – 32.32 acres
		Watercourse FP3 – 0.51 acres
		Subtotal - 66.98
Total	57,711 ft	68.31

Table 3.3-4. Summary of CDFW Jurisdictional Watercourses in Study Area¹

Type of Watercourse	Linear Distance in Study Area	Acres in Study Area
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1 – Study Area is defined as the potential development area, plus a buffer of 300 feet. The specific acreage of each type of watercourse that may be impacted is presented in Table 4.3-2.

2 – Abandoned channels are considered to be potentially under CDFW jurisdiction at this time. A final determination of jurisdiction will be made by CDFW through the Streambed Alteration Permit process.

3 – Active floodplains are identified in Huffman-Broadway 2017 with the designation “FP”.

The Federal jurisdictional delineation guidelines, based on the USACE and U.S. Environmental Protection Agency guidance, determined the potential waters of the U.S. within the Study Area totaled 41,932 linear feet of either ephemeral riverine intermittent streambed (40,349 linear feet) or excavated ephemeral riverine intermittent streambed (1,583 linear feet). Of these potential Federal waters, none were categorized as streambeds subject to Section 10 of the Rivers and Harbors Act of 1899. Additionally, all of the 41,932 linear feet of potential Federal waters were determined by the Corps to be intrastate isolated waters with no apparent interstate or foreign commerce connection, and are therefore excluded from Clean Water Act jurisdiction.

3.3.5 Cacti

Systematic sampling of succulents (cacti) was conducted during Fall 2012 rare plant surveys. Yuccas were not found on site, but three species of cactus were documented within the Study Area. The cacti were not recorded with GPS waypoints or in the electronic database; however, they were tallied and represent a good census of all cacti onsite. No cacti were observed on the inholding. The estimated totals of all cacti found on site are as follows:

- silver cholla (*Cylindropuntia echinocarpa*): 106 individuals;
- common fish hook cactus (*Mammillaria tetrancistra*): 11 individuals; and
- barrel cactus (*Ferocactus cylindraceus*): 1 individual.

3.3.6 Invasive Weeds

Per the Project’s IWMP, there are seven target invasive weed species observed on the Study Area during rare plant surveys (Table 3.3-5). Each of these species is described further below. Three additional nonnative plants, including lamb’s quarters, nettleleaf goosefoot, and prostrate knotweed, were scarce in occurrence on the Project site and have low invasive potential, and thus, are not considered target invasive weed species on the Project site.

Table 3.3-5. Target Invasive Weeds Documented in the Study Area

Common Name	Scientific Name	BLM Risk Rating
Sahara mustard	<i>Brassica tournefortii</i>	High
Bermuda grass	<i>Cynodon dactylon</i>	Low
Eucalyptus	<i>Eucalyptus</i> sp.	Low
Russian thistle	<i>Salsola tragus</i>	Moderate
Mediterranean grass	<i>Schismus barbatus</i>	Moderate

Table 3.3-5. Target Invasive Weeds Documented in the Study Area

Common Name	Scientific Name	BLM Risk Rating
Tamarisk	<i>Tamarix ramosissima</i>	Low
Puncture vine	<i>Tribulus terrestris</i>	Low

Sahara mustard is the most aggressive and abundant invasive plant within the Study Area. It is diffusely distributed throughout the Study Area on many habitats, and locally abundant throughout the sandier areas of the Study Area (e.g., along the gen-tie line). Millions of individuals were observed flowering and fruiting during the Spring 2013 rare plant survey. This species spreads easily, and its degree of invasiveness has been listed as ‘high’ by Cal-IPC. Its BLM risk rating for spread on the Project site is considered high. Minimal winter rains can germinate multiple leaf rosettes, many of which can bolt and produce seed in a short time. Potential for Sahara mustard to expand its presence across other less sandy areas of the site remains high, especially if aided by soil surface disturbance.

Figure 3.3-10 shows the heaviest infestations of Sahara mustard on the site. Although it generally invades sandy areas, the surveyors noticed that it is most abundant along the shallow margins and skirts of the major dune systems on the west portion of the Study Area. It also dominates shallow sand sheets elsewhere, as well as certain sand accumulations adjacent to abandoned agriculture fields.

Sahara mustard had very little presence on the 160-acre private inholding. This goes against the common association of disturbed areas becoming breeding grounds for weeds. In fact, both of the main agricultural fields seemed to support very few invasive weeds at all.

Russian thistle (*Salsola tragus*) was observed mostly on the gen-tie line sand dune areas, with occasional small occurrences across disturbed areas of the site. This plant represents the second most common weed onsite after Sahara mustard. Occasional locally abundant populations are to be expected associated with soil disturbance and loose sand. This species is considered limited in its degree of invasiveness by Cal-IPC, and it is considered a noxious weed by the California Department of Food and Agriculture (CDFA 2011). Its BLM risk rating for spread on the Project site is considered moderate.

Mediterranean grass (*Schismus barbatus*) is widespread across the site (including the 160-acre private inholding) in many habitats but never “abundant.” This plant is so widespread across many California deserts that it has become the dominant annual grass in many situations. Although it is very common, it poses only a slight ecological type conversion risk in this locally harsh situation. This species is considered limited in its degree of invasiveness by Cal-IPC. Its BLM risk rating for spread on the Project site is considered moderate.

Bermuda grass (*Cynodon dactylon*) was observed in the *Parkinsonia florida*-*Olneya tesota* alliance along the northern part of the site adjacent to an existing solar facility. Two small patches were seen growing in the shade of ironwoods. They were in robust condition, flowering and fruiting. It occurs as a weed in disturbed areas throughout California at elevations below 3,000 feet, and is considered moderately invasive by Cal-IPC. Due to the conditions on the Project site, its BLM risk rating for spread on the Project site is considered low.

Eucalyptus (*Eucalyptus* sp.) occurs only as a couple of planted individuals on the north margin of the site on the border of an existing solar facility. Its potential for invasiveness is low due to the harsh conditions of the local landscape.

Tamarisk (*Tamarix ramosissima*) occurs as only a couple of dwarfed individuals on the north margin of the site at the border of the existing solar facility. This species spreads easily in riparian areas and lake margins with perennial water supply, and its degree of invasiveness has been listed as 'high' by Cal-IPC. Furthermore, it is considered a noxious weed by the California Department of Food and Agriculture (CDFA 2011). Its BLM risk rating for spread on the Project site is considered low. However, the risk rating could differ if the Project were to introduce ponds.

Puncture vine (*Tribulus terrestris*) was observed, in the amount of a few individuals, during the botanical inventories. The observations were limited to the boundary around the private 160-acre parcel inholding. Because rare plant surveys were conducted following winter rains and puncture vine is a summer annual, it is likely the site contains more individuals than inventoried. Puncture vine is widespread in California, inhabiting agricultural lands, roadsides, and other disturbed locations, often in areas with high soil compaction. Puncture vine is a California class C weed, which are subject to measures to retard the spread or suppress the plant populations when found. Furthermore, puncture vine is a prohibited noxious weed in Arizona and Nevada, both of which can be accessed within two hours of the Project area. This species is considered limited in its degree of invasiveness by Cal-IPC. Its BLM risk rating for spread on the Project site is considered low.

3.4 Biological Resources – Wildlife

This section is based, in part, upon information from these sources:

1. Biological Resources Technical Report (Ironwood 2016, provided in Appendix M);
2. California Natural Diversity Database (CDFW 2016);
3. Northern and Eastern Colorado Desert Coordinated Management Plan (NECO Plan Amendment to the CDCA Plan) (BLM 2002); and
4. BLM Special Status Animal Species by Field Office (BLM 2014).

Generally, the Study Area for wildlife resources included a 5,045-acre area consisting of public lands administered by the BLM (4,885 acres) and private land under the land use jurisdiction of Riverside County (160 acres). The privately-owned portion of the Study Area is generally referred to herein as the “160-acre private inholding.” In some instances species-specific survey protocols required survey buffers, resulting in a larger Study Area (e.g., golden eagle and bat surveys). Survey buffers are discussed where necessary under species-specific discussions.

The Study Area supports a variety of desert-adapted wildlife that use the vegetation alliances described in Section 3.3, *Biological Resources - Vegetation*. Wildlife observed within the Study Area during biological surveys was representative of the western Sonoran Desert. Bird species documented during surveys, listed in order of most-to-least frequently observed, included black-throated sparrow (*Amphispiza bilineata*), horned lark (*Eremophila alpestris*), common raven (*Corvus corax*), Brewer's sparrow (*Spizella breweri*), white-crowned sparrow (*Zonotrichia leucophrys*), house finch (*Carpodacus mexicanus*), and ash-throated flycatcher (*Myiarchus cinerascens*). Brewer's sparrow and White-crowned Sparrow are passing migrants and winter residents only. Reptile species documented during surveys included Mojave fringe-toed lizard (*Uma scoparia*), Great Basin whiptail (*Cnemidophorus tigris*), side-blotched lizard (*Uta stansburiana*), zebra-tailed lizard (*Callisaurus draconoides*), desert iguana (*Dipsosaurus dorsalis*), and desert horned lizard (*Phrynosoma platyrhinos*). Six Mojave desert tortoise carcasses and one set of tortoise tracks were also observed on the Project site. Small mammal trapping documented the desert kangaroo rat (*Dipodomys deserti*), Merriam's kangaroo rat (*Dipodomys merriami*), desert woodrat (*Neotoma lepida*), Pacific pocket mouse (*Perognathus longimembris*), pocket mouse (*Chaetodipus spp.*), southern grasshopper mouse (*Onychomys torridus*), and round-tailed ground squirrel (*Spermophilus tereticaudus*). Species of amphibians and fish were not detected within the Study Area. Potential habitat for desert amphibian species (Couch's spadefoot toad) exists in the Study Area.

The Study Area is not located within any ACECs, TCAs and associated wildlife linkages, BLM wilderness areas, USFWS-designated critical habitat, or other areas designated for the protection of wildlife. The Chuckwalla ACEC is located approximately five miles west of the Study Area. The Chuckwalla Unit of Mojave desert tortoise critical habitat is approximately 15 miles west of the Study Area.

The NECO Plan Amendment to the CDCA Plan addresses conservation of the bighorn sheep through the designation of Bighorn Sheep Wildlife Habitat Management Areas (WHMAs). The McCoy Mountains WHMA is located approximately 0.5-mile north of the Study Area's ROW Boundary, immediately north of Interstate 10, and the Mule Mountains WHMA is located

approximately 0.9-mile southwest of the Study Area's ROW Boundary. These two WHMAs (shown in Figure 3.4-10) are currently listed as unoccupied range (BLM 2002). Lastly, a Herd Management Area (HMA) for burros is located approximately five miles south of the Study Area.

3.4.1 Special-Status Wildlife Species

Special-status wildlife species are those afforded special recognition by Federal, state, or local resource agencies or organizations. Special-status wildlife species have relatively limited distribution and typically require unique habitat conditions. For the purposes of this Final PA/EIS/EIR, special-status wildlife species are defined as meeting one or more of the following criteria:

1. Listed as threatened or endangered or candidates for future listing as threatened or endangered under the Federal Endangered Species Act (FESA) or California Endangered Species Act (CESA);
2. Protected by the Bald and Golden Eagle Protection Act (BGEPA);
3. Designated as BLM Sensitive;
4. Designated by CDFW as a Species of Special Concern (SSC);
5. Designated as a Fully Protected Species per FGC Sections 3511, 4700, 5050, and 5515; or
6. Protected under FGC Section 4000 (fur-bearing mammals).

A list of 29 special-status wildlife species meeting the criteria above and with potential to occur within the vicinity of the Study Area was generated by searching multiple databases and reference sources for occurrence records, including the following:

- U.S. Fish and Wildlife Service Information for Planning and Conservation (IPaC, online at <https://ecos.fws.gov/ipac/>);
- California Natural Diversity Database (CNDDDB);
- California Wildlife Habitat Relationship System (CWHRs, online at <http://www.dfg.ca.gov/biogeodata/cwhr/cawildlife.aspx>); and
- DRECP modeled suitable habitat layers.

Sixteen of these 29 special-status wildlife species or their sign were observed during Project-specific surveys performed between Fall 2012 and Spring 2015 (Table 3.4-1). Avian species solely protected by the Migratory Bird Treaty Act (MBTA) and FGC Sections 3503, 3503.5, and 3513 are excluded from Table 3.4-1 given that these regulations afford protection to most avian species occurring naturally in North America. While excluded from Table 3.4-1, avian-specific surveys were conducted to determine presence and evaluate risks to all migratory birds and raptors.

Special-status species exclude wild horses and burros. While these species are protected under the Wild Free-Roaming Horse and Burro Act, they are not generally considered special-status wildlife species given that they are introduced species to North America and are afforded protection primarily given their historic relevance in the western U.S. As noted in Section 1.8.2, there are no wild horse or burro populations in the area, so these species are not discussed further.

Special-status wildlife species detected during Project-specific surveys are discussed further below. Species for which evidence of occurrence was detected and those likely to occur are also discussed. Generally, special-status wildlife species for which species-specific surveys were performed are discussed separately whereas discussions of some special-status species detected during general inventories (i.e., migratory birds and bats) are grouped.

Table 3.4-1. Special-Status Wildlife Species Evaluated for Potential Occurrence within the Study Area

Common Name	Scientific Name	Status (State/Federal/BLM) ^a	Potential for Occurrence within Study Area
<i>Amphibians</i>			
Couch's spadefoot toad	<i>Scaphiopus couchii</i>	SSC/-/BLM Sensitive	LOW POTENTIAL. No Couch's spadefoot individuals were observed during surveys conducted between 2008 and 2013. However, two locations identified as likely to support were identified, and were inspected after heavy rains from 2008 to 2013. These areas were found to not hold water for a period of 8 days. Surveys of the CRSS for other projects identified the species in that area. Predicted occupied habitat present on a portion of the site in DRECP model.
<i>Reptiles</i>			
Mojave (Agassiz's) Desert tortoise	<i>Gopherus agassizii</i>	ST/FT/-	PRESENT – Resident (low numbers). Study Area is located within BLM Category III Mojave desert tortoise habitat. Six carcasses and one set of fresh tracks found in Study Area during focused surveys. One live adult female Mojave desert tortoise was observed within the buffer area during avian surveys. Predicted occupied habitat present onsite in DRECP model.
Mojave fringe-toed lizard	<i>Uma scoparia</i>	SSC/-/BLM Sensitive	PRESENT – Resident. Presence confirmed during herpetofaunal surveys. Approximately 241 individuals observed in areas supporting fine sand or sandy loam soils. Predicted occupied habitat present onsite in DRECP model.
<i>Birds</i>			
Cooper's hawk	<i>Accipiter cooperi</i>	SSC/-/-	PRESENT - Foraging. Observed foraging during Fall 2013 and Spring/Fall 2014 surveys. Nesting habitat limited. May forage year-round.
Western burrowing owl	<i>Athene cunicularia hypugaea</i>	SSC/-/BLM Sensitive	PRESENT – Resident. Observed during focused surveys. Predicted occupied habitat present onsite in DRECP model.
Elf owl	<i>Micrathene whitneyi</i>	SE/-/BLM Sensitive	ABSENT. Suitable habitat was not present in the Study Area or surrounding 1-mile. No predicted occupied habitat present onsite in DRECP model.
Golden eagle	<i>Aquila chrysaetos</i>	CFP/BGEPA/BLM Sensitive	MODERATE POTENTIAL – Foraging. Observed within 10-mile survey buffer. Nesting habitat is absent from Project Site but nests and active territories potentially located within 10-mile buffer. One nest occurrence is identified within the 10-mile radius, in the McCoy Mountains, in the DRECP.
Ferruginous hawk	<i>Buteo regalis</i>	-/-/BLM Sensitive	PRESENT – Foraging/Migration. Nesting habitat absent. May use site vicinity for overwintering. No predicted occupied habitat present onsite in DRECP model.
Swainson's hawk	<i>Buteo swainsoni</i>	ST/-/-	PRESENT – Foraging/Migration. Nesting habitat absent. May be present (foraging) during summer and during fall migration.

Table 3.4-1. Special-Status Wildlife Species Evaluated for Potential Occurrence within the Study Area

Common Name	Scientific Name	Status (State/Federal/BLM) ^a	Potential for Occurrence within Study Area
Vaux's swift	<i>Chaetura vauxi</i>	SSC/-/-	PRESENT – Foraging/Migration. Nesting habitat absent. May be present (foraging) during summer and fall prior to migration.
Western snowy plover	<i>Charadrius alexandrinus nivosus</i>	SSC/FT/-	LOW POTENTIAL – Migration. Nesting habitat not present. May be a rare migrant vagrant to the area if ephemeral water is present
Northern harrier	<i>Circus cyaneus</i>	SSC/-/-	PRESENT – Resident/Migration. Nesting habitat limited in agricultural settings nearby. May use site vicinity for overwintering.
Peregrine falcon	<i>Falco peregrinus anatum</i>	CFP/-/-	MODERATE POTENTIAL – Foraging/Migration. Nesting habitat absent from vicinity of Study Area. May occur (foraging) during migration.
Loggerhead shrike	<i>Lanius ludovicianus</i>	SSC/-/-	PRESENT – Resident. Nesting habitat present. Many individuals observed within the Study Area.
Vermilion flycatcher	<i>Pyrocephalus rubinus</i>	SSC/-/-	LOW POTENTIAL – Resident/Foraging. Nesting habitat limited. May be present (foraging) year-round.
Bendire's thrasher	<i>Toxostoma bendirei</i>	SSC/-/BLM Sensitive	LOW POTENTIAL – Resident. Nesting habitat present.
Crissal thrasher	<i>Toxostoma crissale</i>	SSC/-/-	LOW POTENTIAL – Resident. Nesting habitat present.
Le Conte's thrasher	<i>Toxostoma lecontei</i>	SSC/-/BLM Sensitive	PRESENT – Resident. Nesting habitat present.
Prairie falcon	<i>Falco mexicanus</i>	WL/-/-	PRESENT – Foraging. Nesting habitat absent from vicinity of study area. May be present (foraging) year-round.
Mammals			
Pallid bat	<i>Antrozous pallidus</i>	SSC/-/BLM Sensitive	PRESENT – Foraging. Species detected during acoustic surveys as a foraging species; no roosting habitat occurs onsite. Predicted occupied habitat present onsite in DRECP model.
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	SSC, CT/-/BLM Sensitive	LOW POTENTIAL – Foraging. No roosting habitat occurs, but the species may potentially forage onsite. Predicted occupied habitat present onsite in DRECP model.
Western mastiff bat	<i>Eumops perotis californicus</i>	SSC/-/BLM Sensitive	PRESENT – Foraging. Species detected during acoustic surveys. This species has a low potential to roost onsite.
Pocketed free-tailed bat	<i>Nyctinomops femorosaccus</i>	SSC/-/-	PRESENT – Foraging. Species detected during acoustic surveys. This species has a low potential to roost onsite.
Western red bat	<i>Lasiurus blossevillii</i>	SSC/-/-	LOW POTENTIAL – Foraging. No roosting habitat occurs, but the species may potentially forage onsite.

Table 3.4-1. Special-Status Wildlife Species Evaluated for Potential Occurrence within the Study Area

Common Name	Scientific Name	Status (State/Federal/BLM) ^a	Potential for Occurrence within Study Area
California leaf-nosed bat	<i>Macrotus californicus</i>	SSC/-/BLM Sensitive	MODERATE POTENTIAL – Roosting/Foraging. Roosting and foraging habitat occurs onsite, although not documented during acoustic surveys. Predicted occupied habitat present onsite in DRECP model.
Cave myotis	<i>Myotis velifer</i>	SSC/-/ BLM Sensitive	PRESENT – Foraging. Species detected during acoustic surveys. Closest known maternity colony is located at the Hodge Mine, approximately 3.4 miles south of the study area.
American badger	<i>Taxidea taxus</i>	SSC/-/-	PRESENT – Resident. No live badgers were seen. Evidence that badgers utilize the Project site. Predicted occupied habitat present onsite in DRECP model.
Desert kit fox	<i>Vulpes macrotis arsipus</i>	FCG 4000-4012/-/-	PRESENT- Resident. Nine individuals documented during surveys.
Desert bighorn sheep	<i>Ovis Canadensis nelsoni</i>	-/-/-	LOW POTENTIAL – WHMAs located 0.5 miles north and 0.9 miles southwest of Project.
Burro deer	<i>Odocoileus hemionus eremicus</i>	-/-/-	MODERATE POTENTIAL – No records of this species are found for the site, it has a moderate potential to utilize the surrounding area for foraging or movement.

^a **Status codes:**

State

SE = State listed as endangered; ST = State listed as threatened; CT = State candidate as threatened

SSC = California Species of Special Concern. Species of concern to CDFW because of declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction

CFP = California Fully Protected Species WL = State watch list

FCG 4000-4012 = Fish and Game Code Sections 4000 through 4012 – California regulations addressing fur-bearing mammals

Federal

FE = Federally listed endangered: species in danger of extinction throughout a significant portion of its range; FT = Federally listed, threatened: species likely to become endangered within the foreseeable future

BGEPA = Bald and Golden Eagle Protection Act

Bureau of Land Management

BLM Sensitive = Species that require special management consideration to avoid potential future listing under the FESA and that have been identified in accordance with procedures set forth in BLM Manual section 6840.

Mojave Desert Tortoise

The Project is located in the historic range of Agassiz's Mojave desert tortoise, but anthropogenic disturbances in the Project vicinity, including agriculture, OHV recreation, utility corridors, roads, and other developments, and residential trash dumping, appear to have limited tortoise populations in the vicinity. According to the CNDDDB, there are 16 occurrences for Mojave desert tortoise within five miles of the Project (CDFW 2016). The observations suggest that Mojave desert tortoise populations in the vicinity of the Project are most dense on bajadas of nearby mountain ranges, particularly along the north slopes of the Mule Mountains situated southwest of the Project. They appear to be largely absent from the valley floors, though they may access them during April and May when annual forage plants are in bloom, and during dispersal movements between the Mule Mountains and the McCoy Mountains located to the north.

Full-coverage protocol Mojave desert tortoise surveys were conducted in Spring 2013 to document tortoise sign (e.g., live tortoises, shell/bone/scutes, scat, burrows/pallets, tracks, and egg shell fragments) within the Study Area. Mojave desert tortoise surveys followed the most current USFWS survey protocol (USFWS 2010) and consisted of belt transects approximately 10 meters wide to provide 100 percent coverage of the portion of the Study Area administered by BLM (i.e., 4,885 acres). Preliminary baseline herpetofaunal investigations and visual encounter surveys were not performed on the 160-acre private inholding. However, a habitat assessment of the inholding was conducted in Spring 2015 by walking 100 percent of the parcel. There is predicted occupied habitat present onsite in the DRECP suitable habitat model.

Mojave desert tortoise sign found during protocol surveys included six carcasses (Figure 3.4.1). All carcasses were disarticulated and over four years of age. No live Mojave desert tortoises or tortoise burrows were detected during protocol surveys. In addition to the carcasses found during protocol surveys, a set of Mojave desert tortoise tracks was found incidental to protocol surveys by Alice Karl, PhD. during the botany surveys in March 2013 traveling north across the dunes (Figure 3.4.1). Also, a live Mojave desert tortoise individual was observed on September 4, 2014, incidentally during avian surveys, approximately 1.3 kilometers from the southern boundary of the proposed Project site (Figure 3.4-1). This individual was an adult female and was observed foraging in the open. The general habitat and wildlife surveys performed on the 160-acre private inholding, which included focused surveys for burrowing owl and rare plants, did not find any burrows that would be associated with Mojave desert tortoise. Although the entire Project site could be considered suitable Mojave desert tortoise habitat, the lack of burrows and observations of 6 older, disarticulated tortoise carcasses and a set of fresh tortoise tracks during surveys of the Project site in 2013 (Ironwood 2016) appear to suggest that Mojave desert tortoises occasionally disperse through the area.

The USFWS protocol provides methods to estimate the abundance of tortoises occurring within a survey area. However, the USFWS density calculation algorithm is dependent upon documenting live tortoises during protocol surveys. Since no live Mojave desert tortoises were observed within the Study Area during protocol surveys, the USFWS algorithm cannot be used to estimate the Mojave desert tortoise population density. Based on the CNDDDB records in the Project vicinity and survey results within and adjacent to the Project, tortoise densities in the Project site are very low, likely less than one tortoise per square kilometer. This is consistent with tortoise densities on the nearby MSEP, where densities were estimated to be 0.2 tortoises/km².

Figure 3.4-2 shows the situation of the Project with respect to the USGS desert tortoise habitat model. This shows the Project area to be situated within an area with a predicted habitat potential model score of 0.5, which is the mid-range on a scale of 0 to 1.

Figure 3.4-11 shows the location of the Project with respect to the Tortoise Conservation Areas (TCAs), High Priority Colorado Desert Habitat, and desert tortoise linkages described in DRECP. The Project area is not mapped as predicted occupied habitat in the habitat layers for the DRECP analysis, and is not situated within the TCAs, High Priority Habitat, or linkages shown in Figure D-16 of DRECP. Figure 3.4-11 also shows the location of the Project area with respect to the California Desert Linkage Design Network. The network was developed by the California Desert Connectivity Project to identify areas where maintenance or restoration of ecological connectivity is essential for conserving the unique biological diversity of California's deserts and to produce implementable linkage designs and provide the necessary data and information to inform land management, land acquisition, restoration (e.g., habitat restoration and restoration of permeability across transportation barriers), and stewardship in connectivity zones. The northwestern portion of the solar facility and much of the gen-tie line are situated within a branch of the California Desert Linkage Network.

Mojave Fringe-Toed Lizard

Two preliminary baseline herpetofaunal investigations from October 22 to 23, 2012 and March 25 to April 12, 2013 and one visual encounter survey in Spring 2013 were completed on the portion of the Project site administered by BLM (i.e., 4,885 acres and additional buffer area). Herpetological surveys also included the 160-acre private inholding. Preliminary baseline herpetofaunal investigations consisted of walking belt transects approximately 10 meters wide to provide 100 percent coverage of the portion of the Project site administered by BLM. The visual encounter survey, which is a more intensive survey compared to baseline investigations, was performed along 12 transects (ten on-site and two in a one-mile buffer zone). Preliminary baseline herpetofaunal investigations and visual encounter surveys were not performed on the 160-acre private inholding. However, a habitat assessment of the inholding was conducted in Spring 2015 by walking 100 percent of the parcel.

The presence of the Mojave fringe-toed lizard within the Study Area was confirmed during herpetofaunal surveys. Occurrences of the species are shown in Figure 3.4-3, overlaid on the vegetation alliances. Thirteen individuals determined to be of the genus *Uma* were collected briefly to identify them to the species level using the inter-naris scale pattern, as recommended by Stebbins and McGinnis (2012). All individuals were determined to be Mojave fringe-toed lizard, as opposed to the Colorado Desert fringe-toed lizard (*Uma notata*) or the Coachella Valley fringe-toed lizard (*Uma inornata*). The Project site is coincident with a portion of the range of the Mojave fringe-toed lizard, but is not coincident with the ranges for either the Colorado Desert fringe-toed lizard or the Coachella Valley fringe-toed lizard. Therefore, it is assumed that all observations of *Uma* recorded during herpetofaunal surveys are the Mojave fringe-toed lizard. Approximately 241 individuals were detected during herpetofaunal surveys. Observations of Mojave fringe-toed lizards were confined to the northwest corner and gen-tie line portion of the Project site (Figure 3.4-3).

The habitat assessment of the 160-acre private inholding determined that this area does not have suitable habitat for fringe-toed lizards. No lizards or evidence of lizards utilizing the 160-acre inholding were found.

Couch's Spadefoot Toad

There are reports from other projects of the species being present at the CRSS. There is predicted occupied habitat present onsite in the DRECP suitable habitat model.

The BRTR (Ironwood 2016) identified 27 locations within the Study Area that had standing water at some point between 2008 and 2012. Two of these locations were identified as likely to support the species, due to their extent and association with dry desert wash woodland plant species. One of these was the *Parkinsonia florida-Olneya tesota* alliance area located near the NRG Blythe Solar facility (also identified in Huffman-Broadway [2017] as floodplain FP-1), and the other was located in the buffer outside of the Project area. Both locations were visited after heavy rains between 2008 and 2012 to determine if they held ponded water for more than 8 days, and they were also subjected to monitoring during the monsoon season in the summer of 2013. Neither area was determined to hold ponded water for more than 8 days. However, breeding ponds are only one aspect of habitat required by the species. These toads spend most of the year in refuge burrows, buried underground. The location of refuge burrows is not known, but it is not thought to be in soil underneath dried up breeding pools. Therefore, the ephemeral nature of the ponds and absence of documented occurrences does not necessarily document that the species is absent.

Western Burrowing Owl

According to the CNDDDB, there are 42 records for burrowing owl within five miles of the Project site (CDFW 2016).

Focused western burrowing owl surveys were conducted in an effort to assess occupancy, abundance, site use and distribution. Burrowing owl surveys were conducted in Fall 2012, Spring 2013, and Spring 2014. Surveys performed in Fall 2012 and Spring 2013 were conducted in accordance to the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012) and *Burrowing Owl Survey Protocols and Mitigation Guidelines* (California Burrowing Owl Consortium [CBOC] 1993). Surveys performed in Spring 2014 followed a Project-specific protocol. This Project-specific protocol incorporates guidance from CDFW (2012) and CBOC (1993) and is included as Appendix C of the BRTR. Focused surveys were performed across the portion of the Study Area administered by BLM (i.e., 4,885 acres) plus a 150-meter buffer during the Spring 2014 survey effort. Burrowing owl surveys in previous years were conducted on 4,885 acres with a 150-foot buffer (which included binocular surveys of a portion of the private inholding, and other private lands contiguous with the outer boundaries of the BLM lands surveyed). All burrowing owl sightings and burrows with burrowing owl sign (e.g., whitewash, tracks, pellets, feathers) were mapped and recorded. Burrows were ranked by class (i.e., Class 1 to 4) depending on the age and type of sign present.

During Fall 2012, Spring 2013, and Spring 2014, 70 burrows ranked Class 1 (2012, n = 3; 2013, n = 1; 2014, n = 0), Class 2 (2012, n = 2; 2013, n = 5; 2014, n = 5) and Class 3 (2012, n = 0; 2013, n = 15; 2014, n = 39) were detected within the Study Area (Figure 3.4-4). The burrow Class ranks are defined as follows: Class 1 – Excellent (usable burrow with burrowing owl present), Class 2 – Good (usable burrow, fresh sign but no owl present), and Class 3 – Fair (usable burrow, inactive

with old sign, no burrowing owl present). One of these burrows was detected within the 150-meter survey buffer and indicated recent burrowing owl occupation/use (Figure 3.4-4). Monitoring surveys conducted during the 2013 breeding season documented live owls at two burrows. One of these burrows was potentially occupied (Class 2) during Fall 2012 surveys; the other was a previously undocumented rodent burrow. Young were not positively identified at either burrow during 2013 monitoring surveys. No live burrowing owls were detected during 2014 surveys.

Burrowing owls were also incidentally reported in and around the Study Area on four occasions between September 2014 and February 2015. Only one of these detections (made during the winter 2015) was within the Study Area (Figure 3.4-4). Finally, a burrow complex containing a pellet and feather was detected during a reconnaissance survey on the 160-acre private inholding.

Results from burrowing owl surveys suggest use of the Study Area changes temporally. Survey evidence suggests greater use of the Study Area outside of the breeding season, with only two pairs remaining to attempt reproduction in 2013 and none in 2014. Although burrowing owls exhibit high burrow fidelity, surveys documented dynamic occupancy of burrows, likely a factor of dynamic movement patterns.

Golden Eagle

Focused golden eagle surveys were conducted in December and January 2013/2014 and 2014/2015 following the Interim Golden Eagle Inventory and Monitoring Protocols (Pagel et al. 2010) and other recommendations. There is no potential golden eagle nesting habitat on the Project area; however, suitable nesting habitat exists within 10 miles of the Study Area in the Little Chuckwalla Mountains, the Mule Mountains, and the McCoy Mountains. DRECP documents one golden eagle nest occurrence in the McCoy Mountains within the 10 mile radius of the Project area. Therefore, focused golden eagle surveys were conducted within a 10-mile radius surrounding the Study Area. Eighteen observation points were established in the 10-mile radius and each was visited twice during the courtship/breeding season (Figure 3.4-5). Some of the closely-spaced observation points surveyed in 2013/2014 were re-located prior to the start of 2014/2015 surveys in order to provide a wider geographic range of coverage.

One adult golden eagle was recorded during focused surveys. This individual was detected on January 21, 2014 and was observed soaring low heading southwest (Figure 3.4-5). No golden eagles were detected during a follow up visit to the same location on February 11, 2014. There were no golden eagle sightings during the 2014/2015 surveys. In addition, there were no incidental golden eagle observations during other biological surveys, including migratory bird surveys and line transect sampling.

Although DRECP identifies one nesting site in the McCoy Mountains within the 10-mile radius, no active golden eagle nests were detected within the 10 mile radius surrounding the Study Area during surveys. The one historic golden eagle territory was occupied by a pair of red-tailed hawks during the 2013/2014 breeding season. Two nests were observed in the vicinity of the eagle sighting documented in January 2014. One nest was inactive and the other was occupied by red-tailed hawks. To assess golden eagle prey abundance within the Study Area, surveys were conducted in Spring 2013 to estimate population densities of small mammals, including black-tailed jackrabbits and cottontail rabbits. In March and April 2013, a total of 17 black-tailed jackrabbits were detected across the 4,855 acre Project site, equating to an estimate of approximately 0.0035 black-tailed jack rabbits/acre. The reported density of black-tailed jack

rabbits in other locations is 0.04 to 5.2 rabbits per acre (Best 1996), suggesting that the value of 0.0035 rabbits per acre on the Project site is relatively low. A total count of cottontail rabbits was not conducted, therefore, a density estimate cannot be established for the species.

Other Migratory Birds and Raptors

Avian surveys conducted for the Project used various sampling methodologies to depict the occurrence and habitat use by birds during all critical life stages. Sampling models and survey techniques were designed to maximize the detection of migratory birds and local residents; including all raptor, shorebird, waterfowl and passerine species. Three types of general avian surveys were conducted: (1) migratory bird surveys; (2) line transect sampling; and (3) nesting raptor and raven surveys. A summary of methods and results for these survey efforts follows.

Migratory Bird Surveys

Migratory bird surveys were performed to record observed avian migration and use patterns within and adjacent to, the Study Area. Data on diurnal bird migration provided information on: (1) seasonal and overall avian population pulses and individual species pulses within seasons; (2) range of daily behavior and movements; (3) flight elevation through and near the Project; and (4) duration of seasonal occurrence by migratory birds, including raptors.

Weekly migratory bird surveys were conducted during Spring and Fall migration periods in 2013 and 2014 using unlimited-distance bird migration survey methods. These surveys followed guidance provided by BLM, USFWS, and CDFW, and the protocol prescribed by the Hawk Migration Association of North America (HMANA). The HMANA protocol is now standard for hawk migration counts (Bird and Bildstein 2007, Bildstein et al. 2007). The protocol for migratory bird surveys is included as Appendix D of the BRTR.

Two migration points (i.e., MP01 and MP02) were initially established within the Study Area in Fall 2013 (Figure 3.4-6). These MPs bisected the Study Area along the central east-west axis, and exhibit near 360 degree views of the distant horizon to maximize detection of migrating birds passing over the area. After the Fall 2013 season, avian biologists determined that migration points should be adjusted due to the pattern of migratory movement prevalent in the area. Therefore, MP01 and MP02 were replaced with MP03 and MP04 at the start of Spring 2014 survey season (Figure 3.4-6).

A close inspection of the data collected during migratory bird surveys revealed two distinct peaks in migration in Fall 2013 (October 1 and October 9). Few observations were made in Spring 2013 and no peak in migration was apparent. Two peaks in migration were apparent for 2014. The first peak occurred in Spring 2014 around March 24; the second peak occurred in Fall 2014 around September 21.

Uncontrollable and variable factors including rainfall rates, temperatures, wind speed and wind direction could have an influence on these results and these peak migratory periods should be considered approximate due to the limited number of survey seasons represented. The greatest numbers of individual species detected at one time during the spring were flocks of unidentified swallows and tree swallows with numbers reaching 1000 and 950 birds respectively on a single day (all in 2014). Large number of turkey vultures (782 in one day for the highest count) and Swainson's hawks (620 in one day) were observed during fall migration.

Special-status species observed during migratory bird surveys include Swainson's hawk (state-listed as threatened), Cooper's hawk (designated by CDFW as a SSC), ferruginous hawk (a BLM Sensitive species), Vaux's swift (designated by CDFW as a SSC), northern harrier (designated by CDFW as a SSC), loggerhead shrike (designated by CDFW as a SSC), and Le Conte's thrasher (designated by CDFW as a SSC), both of which are year-round resident species.

Line Transect Sampling

Line transect sampling was conducted to depict avian use patterns within and adjacent to the Study Area. Data from line transect sampling provided information on the following: (1) sedentary and migratory populations; (2) species richness (number of different species present); (3) species diversity (species richness combined with species evenness); (4) species use, behavior and movements; and (5) species distribution across the Project.

Line transect sampling was conducted from Spring 2013 to Winter 2014/2015, not including the summer months. Surveys were timed to capture migrants, breeding birds, and local residents. Line transect sampling was conducted by traveling a pre-determined route and recording all bird detections (visual or aural) on either side of the transect line. The protocol for line transect sampling is included as Appendix D of the BRTR.

A total of eight 2,000-meter transects were established in Spring 2013 and eight more were added in Fall 2013 (Figure 3.4-6). To facilitate robust data analysis, eight of the 2,000-meter line transects were situated within the Study Area and eight were located outside the Study Area on public lands. Two 500-meter transects were added to survey the 160-acre inholding in October 2014 (Figure 3.4-6). Thus, a total of 18 transects were surveyed as part of line transect sampling.

A total of 3,534 detections were made during the 345 surveys. A total of 17,973 individuals were documented during line transect sampling. To maintain consistency with regards to the number of transects sampled per season, a random subsample of the data was pulled to facilitate analysis. The final subsample contained data from 259 transects, 2,253 detections, and 16,507 individuals. ProgramDistance (Thomas et al. 2010) was used to determine a total density of birds within and outside the Study Area. In every season, species diversity was greater outside the Study Area compared to within the Study Area. Commonly observed species include the barn swallow (*Hirundo rustica*), Swainson's hawk (*Buteo swainsoni*), and turkey vulture (*Cathartes aura*). In all but one season (i.e., Spring 2014), the density estimate was also greater outside the Project site. The greater species diversity and density along the transects outside of the Project site, relative to the transects within the site, are potentially associated with greater avian habitat diversity outside of the site. As shown in the vegetation map (Figure 3.3-2), and the location of the avian survey transects in the BRTR, the transects outside of the Project site boundary either cross through or are adjacent to patches of *Parkinsonia florida*-*Olneya tesota* alliance. This habitat provides a more diverse structure, which has the potential to result in more nesting/breeding, resting, and cover resources for migrating birds.

Nesting Raptor/Raven Surveys

Nesting raptor and raven surveys were conducted monthly in the spring of 2013 and 2014. This effort focused on the detection of all raptor and raven nests within 1-mile of the Study Area to collect baseline data on the number and distribution and success rates of raptor and raven nests prior to development. All nests (including the incidental detection of resident passerine species) were mapped and recorded. A total of 11 raptor/raven nests were recorded during the two years

within the Project site and 1-mile buffer (Table 3.4-2). In 2013, there were four red-tailed hawk nests, and two common raven nests. 2014 data showed an increase in the overall number of nests, including five red-tailed hawk nests, two nests utilized by unknown species of hawk, and three common raven nests. The status of each nest at the time of the survey, and the number of young observed in a nest (if applicable) are shown in Table 3.4-2. Monthly monitoring efforts updated development stage and breeding status at each raptor and raven nest.

Table 3.4-2. Raptor/Raven Nests Detected on the Project Site, Spring 2013 and 2014

Nest ID	Species	Easting	Northing	Date	Status	# Young
BH0001	RTHA	708278	3718453	2013		
RKR0001/ QZNR- 031214-03	RTHA/ UNHA	704893	3716895	4/22/2013/ 5/13/2014	Incubation/ Inactive	
RKR0002/ QZNR- 021414-01	CORA/ RTHA	703684	3717850	4/22/2013/ 5/31/2014	Incubation/ Nest Cycle Complete	
RKR0004/ QZNR- 031214-02	RTHA/ RTHA	706970	3715231	5/9/2013/ 5/13/2014	Fledgling/Nest Cycle Complete	?/ 2
RKR0006/ QZNR- 031214-08	RTHA/ RTHA	711168	3716543	4/22/2013/ 5/31/2014	Hatchling/ Nestling/ Nest Cycle Complete	?/2
RKR0014/ QZNR- 031214-01	CORA/ CORA	708293	3714185	5/9/2013/ 5/31/2014	Hatchling/Nestling/ Nest Cycle Complete	
QZNR- 031214-04	UNHA	701,352	3,718,549	5/13/2014	Inactive	
QZNR- 031214-05	RTHA	700,831	3,718,568	5/13/2014	Nest Cycle Complete	
QZNR- 031214-06	CORA	702,793	3,717,202	5/31/2014	Nest Cycle Complete	
QZNR- 031214-07	RTHA	709,555	3,713,171	5/31/2014	Nest Cycle Complete	1
QZNR- 032624-01	CORA	708,530	3,718,554	5/30/2014	Hatchling/ Nestling	2

RTHA = red-tailed hawk UNHA = unknown hawk CORA = common raven

A total of 26 raptor or raven nests were documented during focused golden eagle surveys (Figure 3.4-7). All but one of the nests recorded were located beyond the survey area for nesting raptor/raven surveys (i.e., the Study Area plus a one-mile buffer). These nesting raptors included red-tailed hawk, prairie falcon, and undetermined raptor species. Sixteen of these nests were in cliff or rock outcrop substrates, nine were in power line support structures, and one was located in an ironwood tree (*Olneya tesota*). In 2013/2014, species associated with raptor nests included four red-tailed hawks (*Buteo jamaicensis*), two prairie falcons (*Falco mexicanus*), and 12 undetermined species of raptor. For undetermined designations, a nest or partially completed nest was observed that exhibited characteristics of a raptor nest, and may or may not have been associated with a species of raptor observed in the general vicinity (but not at or on the nest). Seven of the nests observed during focused golden eagle surveys were determined to be active, two were determined to be active and occupied, and nine were determined to be inactive. In 2014/2015, two nests were determined to be active: one red-tailed hawk and one prairie falcon.

Desert Kit Fox

Desert kit fox burrow surveys of the Study Area were conducted by walking transects at 10-meter spacing to ensure complete visual coverage of the site. All desert kit fox single-entrance dens and canid complexes that could be occupied without modification were recorded.

Full-coverage burrow surveys revealed 46 canid complexes and 45 single-entrance dens (91 potentially occupied dens/complexes) with some kit fox sign within the Study Area. Twenty-four of these dens/complexes had signs of recent activity, (i.e., desert kit fox tracks, or scat). Each of these 24 dens/complexes was revisited for further inspection of signs of activity. Upon re-inspection, eight dens/complexes were determined to be potentially active, all of which were in the southern portion of the Study Area (Figure 3.4-8). A camera station was set up at each of the eight dens and run for three consecutive days and nights. Six of the eight cameras captured images of nine total individual desert kit fox.

American Badger

Focused surveys were not conducted for the American badger, and the species was not directly observed during other surveys or on imagery from camera stations around the Study Area. However, several badger digs and scat were found on the Study Area, mostly near the southwestern perimeter. The entire Study Area is considered suitable habitat for the American badger.

Bats

According to the CNDDDB, there are four records for California leaf-nosed bat within five miles of the Project site and one record each for pallid bat, Townsend's big-eared bat, hoary bat, Arizona Myotis, and cave myotis (CDFW 2016). Records for two species, California leaf-nosed bat and cave myotis, were recorded over a large polygon that includes portions of the Project site; however, these records are from a mine in the Mule Mountains located southwest of the Project site. There is predicted occupied habitat for the pallid bat, Townsend's big-eared bat, and California leaf-nosed bat present onsite in the DRECP suitable habitat model.

Bat surveys consisted of acoustic monitoring within the Study Area and roost surveys of sites in the vicinity of the Study Area. A summary of methods and results for these survey efforts follows.

Acoustic Monitoring

Acoustic monitoring was conducted for three nights in May 2013 to sample bat species utilizing the Study Area. Twelve Anabat II monitors were deployed at sites with different vegetative components to identify bat species and document activity levels (Figure 3.4-9). Eleven monitors were located within the Project site; one monitor (i.e., Site 4) was located along a wash just outside the Project site. Half of the monitors had standard microphones and half had low frequency microphones with higher sensitivity to sounds in the audio range [4.5 to 20 kilohertz (kHz)]. This enhances recording of certain bat sounds (e.g., pallid and California leaf-nosed bat social calls, western mastiff and other free-tail bat calls) along with insect and bird calls.

Evaluation of acoustic monitoring results identified at least seven bat species: pallid bat (*Antrozous pallidus*), canyon bat (*Parastrellus hesperus*), California myotis (*Myotis californicus*), cave myotis (*Myotis velifer*), Mexican free-tailed bat (*Tadarida brasiliensis*), pocketed free-tail bat (*Nyctinomops femorosaccus*), and Western mastiff bat (*Eumops perotis*) yielded multiple

diagnostic call sequences. For 50 kHz Myotis sequences (calls ending at this frequency), two species (i.e., *Myotis californicus* and *Myotis yumanensis*) are often not distinguishable. California myotis is far more common in open desert habitats distant from surface water. Therefore, 50 kHz Myotis sequences were interpreted to be the California myotis. A small sample of 40 kHz Myotis sequences was obtained at four monitors. There are two *Myotis* in the region that produce similar calls at this frequency: the Arizona myotis (*Myotis occultus*) and the cave myotis. Given the low likelihood of occurrence of the Arizona myotis and the proximity to occupied cave myotis roosts, it was concluded that 40 KHz Myotis sequences were interpreted to be the cave myotis. Four of the acoustically detected species are considered special-status species: pallid bat, cave myotis, Western mastiff bat, and pocketed free-tailed bat. Canyon bat, California myotis, and Mexican free-tailed bat do not have a special-status species designation; therefore these three species were not included in Table 3.4-1.

In addition to the Yuma myotis and California myotis discussed above, another 2 bat species have the potential to occur at some time of the year, including western yellow bat (*Lasiurus xanthinus*), and hoary bat (*Lasiurus cinereus*). The western yellow bat and the hoary bat do not have any special-status species designations, but nonetheless appear on the California Special Animals List (CDFW 2016). Of the bats not detected during the acoustic surveys that have a potential to occur within the Study Area, the most likely species is the California leaf-nosed bat that roosts close to the Study Area. This species can hunt without emitting echolocation signals, relying solely on vision and prey-produced sounds. Therefore, the species may not be detected during acoustic monitoring.

Roost Surveys

Roost surveys were also conducted in May 2013 to examine the mines in the mountains adjacent to the Project site during the day and at night for evidence of bats and guano. Two mines, the Uvanum Mine and McCoy #3, in the southern McCoy Mountains (located approximately 4.4 miles northwest of the Study Area) had previously been identified by Patricia Brown, Ph.D. as supporting California leaf-nosed bat maternity colonies. These mines were gated with bat compatible closures by BLM in 2011. These mines were monitored on May 8 at dusk by surveyors with night vision equipment to obtain accurate exit and entry counts of bats and acoustic records with additional Anabat detectors. California leaf-nosed bats and pallid bats were recorded at these mines during monitoring. The Uvanum Mine is closest to the Study Area. Thirty-three bats exited and 26 entered this mine in the hour after dark. Seventy-one bats exited and 44 entered the McCoy #3 mine to the west of the Uvanum Mine, in another drainage. Non-resident bats may enter a mine to “night-roost”, so the exiting and entering bats may not be the same individuals or species.

Using topographic maps and Google Earth images, a ground reconnaissance was conducted of possible mine features on the north end of the Mule Mountains (1.8 miles south of the Study Area). No underground features that could shelter bats were discovered. The closest known bat colony in the Mule Mountains is the Hodge Mine (also referred to as Stonehouse; situated 3.4 miles south of the Study Area. This mine has been a research site for Dr. Brown since 1976 and contains the largest winter colony of California leaf-nosed bats (*Macrotus californicus*) in the United States, as well as a maternity colony. It is also one of four maternity colonies for the cave myotis (*Myotis velifer*) in California. A total of 3,348 bats exited this mine from five portals on the evening of May 9, 2013.

3.4.2 Wildlife Movement

Wildlife movement corridors, particularly in desert ecosystems that have relatively limited and patchy distribution of resources, are typically linear in nature. Wildlife movement corridors tend to follow geographic features, such as drainages or patches of vegetation that provide protective cover for animal species that move between resources (e.g., water, foraging areas, breeding grounds, etc.). The Study Area could be used by a variety of wildlife species for movement purposes. Wildlife movement activities typically fall into one of three movement categories: 1) dispersal (e.g., juvenile animals from natal areas, or individuals extending range distributions); 2) seasonal migration; and 3) movements related to home range activities (foraging for food or water, defending territories, or searching for mates, breeding areas, or cover).

Multiple wildlife linkages are identified by various entities in the vicinity of the Project. In the 2002 NECO Plan, BLM designated 13 multi-species WHMAs, including one that encompasses the Mule Mountains adjacent to the Project area (Figure 3.4-10). In 2010, the California Department of Transportation (Caltrans) and Department of Fish and Game (now CDFW) sponsored the California Essential Habitat Connectivity Project to develop a statewide map showing essential connectivity areas. The data compiled in support of the California Essential Habitat Connectivity Project was then used by Science and Collaboration for Connected Wildlands (SC Wildlands) in the California Desert Connectivity Project, which developed 22 new linkage designs for the California Desert, including one connecting the Palen and McCoy Mountains to north of the Project area with Picacho to the south (Penrod 2012). The work of SC Wildlands, in turn, was used to support the DRECP through the development of the California Desert Linkage Network. The network was developed to identify areas where maintenance or restoration of ecological connectivity is essential for conserving the unique biological diversity of California's deserts and to produce implementable linkage designs and provide the necessary data and information to inform land management, land acquisition, restoration (e.g., habitat restoration and restoration of permeability across transportation barriers), and stewardship in connectivity zones. The location of the California Desert Linkage Network, presented in Figure D-1 of DRECP, is shown with respect to the project area in Figure 3.4-11. DRECP also designated Tortoise Conservation Areas (TCAs), High Priority Desert Habitat, and linkages, as shown in Figure D-16 of DRECP. These areas are also shown on Figure 3.4-11.

In general, the Project area is situated to the east of these various linkage areas. As shown in Figure 3.4-11, the Project area is not situated within the TCAs, High Priority Habitat, or linkages shown in Figure D-16 of DRECP. The Project would not interfere with wildlife movement through most of the I-10 underpasses, but development as identified in the Proposed Action does occupy the connectivity path leading to the most eastern culvert/underpass identified by SC Wildlands. Figure 3.4-10 shows that the CRSS is situated within the NECO multi-species WHMA, so a few hundred feet of the end of the Project gen-tie line would lie within the WHMA. Figure 3.4-11 shows that the northwestern portion of the solar facility and much of the gen-tie line are situated within a branch of the California Desert Linkage Network.

3.5 Cultural Resources

A BLM Class III Archaeological Survey Report has been completed by Statistical Research, Inc. (SRI), in support of this PA/EIS/EIR (Lerch et al. 2016 and Lerch 2017, provided in Appendix P). In addition, the BLM has initiated consultation with Native American tribes to identify places of traditional religious and cultural significance that may otherwise be left unidentified by these studies. Chapter 5 provides a discussion of the BLM's tribal consultation process.

The information in this section is based on the Class III report generated by SRI for DQSP (Lerch et al. 2016), the previously approved EIS for the MSEP (north of the DQSP) (BLM 2012b), and the Class III report created by AECOM also for the MSEP (Jordan et al. 2011). In April 2018, SRI and BLM conducted archeological testing on three cultural resources to determine if there are subsurface deposits. On May 2, 2018, the BLM conducted additional Class III surveys near the Colorado River Substation (CRSS). The results of that testing are provided in Addendum 2 to the Class III Report (Lerch, 2019a). In addition, an intensive pedestrian survey was conducted by SRI in 2019 for the realignment of the gen-tie line, and three sites previously located outside of the direct APE were revisited and recorded on DPR forms. The results of those efforts were provided in Addendum 3 to the Class III Report (Lerch, 2019b).

3.5.1 Identified Cultural Resources

This subsection provides the results of cultural resource inventories conducted by SRI and described in Lerch et al. 2016 to identify cultural resources within the Project area, including literature and records searches (California Historical Resources Information System [CHRIS] and local records), archival research, Native American consultation, and field investigations. The BLM found no additional resources within the Direct APE during the May 2, 2018 Class III survey.

For purposes of this discussion, the Project area for NEPA is equivalent to the Area of Potential Effects (APE) under the NHPA and CEQA. The regulations implementing NHPA §106 define the APE as the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist. The APE is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking (36 CFR §800.16(d)). In addition, the APE may be buffered for purposes of cultural resources inventory to facilitate the identification of resources that may be located in proximity to the APE and indirectly affected by a proposed project or to allow for redesign of project components to avoid direct effects to cultural resources. The direct APE for this analysis is defined by the boundaries of the Proposed Action. Within the direct APE, ground-disturbing activities would range in depths from 12–18 cm (5–7 inches) for the site surface preparation to 3.7 m (12 feet) for the solar-panel-support posts to 1.2 m (4 feet) for electrical-conduit trenches and to approximately 3 m (10 feet) for electrical vaults (First Solar Development, LLC 2014:35–38). These depths of disturbance, or the vertical APE, will be distributed across the project site at various locations within the direct APE. The indirect APE includes a one-mile buffer surrounding the direct APE, as well as expanded area to incorporate the Mule Tanks Discontiguous Rock Art District. The APE is illustrated on Figure 3.5-1. SHPO agreed with the APE in 2014. The APE in the vicinity of the CRSS was modified in 2018, once the exact route of the gen-tie entry into the CRSS was finalized. SHPO concurred with this modification in 2018. The APE in

the vicinity of the CRSS was again modified in 2019, based on a revision of the gen-tie route in Alternatives 2 and 3.

3.5.1.1 Previous Research

Numerous studies have been completed in the vicinity of the Project area. Recent projects with archaeological studies include Southern California Edison's Devers to Palo Verde II Transmission Line, Genesis Solar Energy Project, Blythe Solar Energy Project, McCoy Solar Energy Project, and the Blythe Mesa Solar Energy.

A Class III survey report for the current Project was conducted by SRI in 2016. SRI completed the records search at the CHRIS Eastern Information Center (EIC) in 2014 of the entire Project area as well as an approximate one-mile buffer around the Project area that may be subject to indirect impacts (Lerch et al. 2016). The following information is taken from the Class III report generated by SRI for DQSP. The records search identified 20 previous cultural resource studies that have been conducted in the Project area and 20 that had been conducted within the vicinity of the Project. The studies conducted included 35 archaeological surveys, three site evaluations, one records search, and one special study. Twenty-two percent of the Project area had been previously examined for cultural resources. SRI also consulted a regional ethnographic overview of the Colorado Desert written by Bean and Vane (1978), unpublished field notes taken by Rogers (1953), and a sample inventory for the Riverside East SEZ by Millington et al. (2013). This last study resulted in ten additional sites being identified within the vicinity of the Project. SRI also utilized ASM Affiliates' site sensitivity model developed in 1998 (McDonald and Schaefer 1998), to hypothesize the expected likelihood of buried cultural resources within the Project area. The ASM report previously reviewed a large portion of the Project area and ascribed a mostly low sensitivity for buried resources to the Project area.

The records search identified 33 previously identified archaeological sites and 12 isolates within the Project area, and an additional 220 archaeological sites and 84 isolates in the vicinity of the Project for a total of 253 archaeological sites and 96 isolates within the one mile search radius of the Project area. The site types present within the Project area and vicinity include 112 prehistoric sites, 104 historic sites, 37 multicomponent sites, 64 prehistoric isolates, 29 historic isolates, and three multicomponent isolates. Prehistoric sites consisted of artifact concentrations, habitation sites, geoglyphs, rock art sites, quarries, thermal features, and trail segments. Historic sites types previously recorded were artifact concentrations, military activity sites, roads, survey markers, and transmission lines. Multicomponent site types documented were artifact concentrations, one structure, one habitation site, one quarry with military activity present, and trail segments.

Only three sites were previously determined eligible for listing on the NRHP. These include P-33-000773, the Mule Canyon site, and P-33-000504, the Mule Tank site, which together are listed in the NRHP as the Mule Tank Discontiguous Rock Art District. Both these sites are located outside the Project area in the nearby vicinity. Site P-33-000504 is a rock art site located west of the Project, while P-33-000773 is a geoglyph and associated features present within the Mule Tank NRHP District. The third eligible site is P-33-000053, the Coco-Maricopa Trail, which passes near the north side of the Project (Lerch et al. 2016).

3.5.1.2 Prehistoric Site Types

Habitation Sites

Habitation sites are characterized by a wide variety of occupation debris and, occasionally, the remains of domestic architecture. These sites can contain living areas (see also rock rings and cleared circles, below), cooking hearths, subsistence remains (faunal bone and plant remains), midden deposits, and artifact scatters. Within the habitation site type, a range of subtypes exist, distinguished primarily by the intensity and longevity of the use of the site as a living space.

Habitation sites can range from very large, permanent villages occupied year round by several families, to small, temporary camp sites occupied once for a matter of days or weeks. Even temporary habitation sites can contain discrete activity areas devoted to a variety of activities such as lithic reduction, milling, butchery, cooking, and other subsistence-related activities.

Prehistoric habitation sites are mainly found within the Colorado River floodplain outside of the Project area. However, four habitation sites were located within the vicinity of the current Project (Lerch et al. 2016). Many of the prehistoric sites include small to large artifact scatters associated with a thermal rock feature.

Thermal Rock Features

The Project area contains numerous thermal rock features consisting of a concentration of fire-affected rocks that may be partially buried. Most of the thermal rock feature sites also contain an artifact scatter. Only one of the sites contained a rock feature that was not fire affected. It consisted of a collection of manuports. Thermal rock features are often interpreted as the remains of roasting pits are occasionally found away from domestic debris as isolates or in groups. Roasting pits sometimes occur in association with natural stands of specific food resources, such as agave, pinyon nuts, and saltbush seeds. These plant foods were often harvested, processed, and roasted before consumption or transport to established habitation sites (Lightfoot and Parrish 2009:347, 354). A roasting pit is a type of earth oven constructed by digging an oval to circular hole and lining it with vegetation or cobbles and small boulders. A fire may be built over the rocks to heat them before placing the plant food materials in the earth oven, or the foodstuffs may be placed directly on the cobbles and then covered with other materials (e.g., green plants, rocks, soil) before a fire is built over the entire feature.

The remains of roasting pits are typically 1 m to 3 m in diameter, roughly circular concentrations of fist-sized cobbles, most showing evidence of thermal alteration. These may be the in situ remains of earth ovens, or they may be “clean out” concentrations of stones removed from an oven to access the roasted foods within. Several examples of this site type were identified along the pebble terraces 8 miles northeast of the Project. Similar features, identified as “agave baking pits” were excavated by Steven Shackley (1984) approximately 94 miles southwest of the Project in the In-ko-pah Gorge area. However, as no agave grows in the DQSP region, the thermal rock features identified on the Project area are believed to have been used to process locally abundant geophytes (plant with underground bulbs, corms, or tubers) such as *Hesperocallis undulata*, desert lily (Lerch et al. 2016).

Ceramic Scatters and Pot Drops

“Ceramic scatter” refers to a dispersed surface distribution of ceramics, typically from multiple vessels. A “pot drop” is traditionally defined as a small, distinct concentration of sherds from a single vessel.

Lithic Scatters and Flaking Stations

Lithic scatters and flaking stations can range from single-use flaking stations to large scatters that contain numerous flaking episodes with a light background scatter of debitage. Discrete flaking stations, where a single episode of lithic reduction occurred, often include cores and debitage, but rarely finished tools or useable flakes. When tools are found in lithic scatters, they are usually broken blanks from early in the manufacturing process, or expedient tools. The debitage in lithic scatters may be the result of various core and biface reduction technologies.

Debitage size and character is often associated with the size of the parent material. A lithic study in the nearby McCoy Wash included a detailed in-field analysis of reduction techniques as reconstructed from the preserved debitage and cores (Flenniken and Spencer 2001). The researchers concluded that four discrete reduction technologies were represented in the wash, all of them apparently contemporaneous and directly related to the size and shape of the source materials chosen for reduction (Flenniken and Spencer 2001:61). Although lithic scatters are generally interpreted by archaeologists as places where toolstone acquisition and tool manufacture occurred, Native American representatives have pointed out that certain ritual activities also result in the production of scatters of flaked stone materials (Altschul and Ezzo 1994; Cachora 1994).

Trails

Trails are generally tamped into stable surfaces, sometimes with larger gravel and pebbles pushed to the sides to form slight berms along the edges of the trail. In the desert, trails are typically found along the tops of ridge systems, on stable alluvial fans, on desert pavements, and in upland areas where they often disappear into washes. Prehistoric trails can follow washes for considerable distances. Several trails have been documented along the lower Colorado River where they are often associated with petroglyphs, ground figures, and cairns (Altschul and Ezzo 1994; Cachora 1994; Johnson 1985; McGuire and Schiffer 1982; Pendleton et al. 1986; Pignuolo et al. 1997; Rogers 1939; Schaefer 1994a, 1994b; von Werlhof 1987).

Cremations and Human Remains

All cultures maintain specific practices and profound beliefs concerning the treatment and disposition of the dead. For that reason, the disturbance of human remains is always a sensitive issue culturally, ethically, and legally. Traditionally, the Late Prehistoric and Proto-historic peoples of the Colorado River area practiced cremation, although other practices, including burial, are known archaeologically. In situ burials and cremations in the Colorado Desert are frequently associated with small collections of artifacts such as ceramics, lithic artifacts, basketry, faunal and botanical materials, and shell ornaments and beads. Very often, cremations and burials were placed in depressions or holes specifically dug for the purpose of interring the dead. For that reason, burials and cremations may be minimally evident or completely imperceptible on the present-day ground surface.

While relatively rare, sites with cremations or burials have been recorded in the Colorado Desert. Burials and cremations are more common in and near habitation sites, and relatively uncommon in non-habitation, resource procurement areas. Nevertheless, special circumstances and special individuals, such as shamans or suspected witches, sometimes necessitated burial far from habitation and in unexpected locales. Human remains are subject to special protection under Federal and state law. Within the Project, the disposition of any Native American human remains and associated funerary objects would be subject to state law and the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA).

3.5.1.3 Historic Site Types

Debris Scatters and Dumps

This feature type ranges from small discrete deposits to large debris concentrations. Several of the sites consist of communication wire placements from military use of the Project area. Other debris includes household or military related debris. Often these are found along trails or roads, complicating temporal and cultural assignments. The Project is located within the former boundaries of the DTC/C-AMA, which was a large-scale military training facility during WWII. Debris scatters dating to the early 1940s, and particularly the period from 1942 to 1945, are likely representative of DTC/C-AMA activities, including ground maneuvers and aircraft training. Other debris scatters falling outside of this time period are likely associated with sporadic mining activities in the vicinity, homesteading, or use of the area after the closure of DTC/C-AMA.

Roads/Trails

Transportation routes consist of historical trails and roads. The condition of the roads may vary from faint two-tracks to graded or paved alignments where the route, not the road, is significant. Several unimproved roads run through and adjacent to the Project area, most associated with the initial survey of the land and the transport of goods and people to mining activities in the region. Most of these roads were likely also used during the WWII-era military training activities of the DTC/C-AMA. One set of tank tracks was also recorded within the Project area.

Historic Camps

Temporary historical camps are found throughout the Colorado Desert. These camps often include features such as campfire/hearths and debris scatters, as well as rectangular cleared areas, often called “tent pads,” that may have been cleared to create a more comfortable sleeping area for sleeping bags and tents. Specific types of temporary historical camps in the Project may include construction camps for linear facilities (railroads, transmission lines, water conveyance, etc.), mining camps, and military camps and bivouacs, and early land and resource surveys.

Water Wells

Formal structures built of wood, stone, concrete, metal, and other materials are not common in the Palo Verde Valley pass owing to the harsh environment, which inhibited homesteading. In the Project vicinity, three sites contain historic water well sites; no other structures have been recorded within the Project area.

Transmission Lines

Two transmission lines are located within a utility corridor that forms the southeastern boundary of the project area, and are within the indirect APE. The Pilot Knob–Blythe 161-kV transmission line (P-33-11110) is a 64.4-mile-long line made of H-frame wooden poles built in 1951 that parallels the 2-mile-long boundary of the DQSP. The Blythe–Niland 161-kV transmission line (P-33-012532/CA-RIV-7127H) is a line of similar wooden-pole H-frame construction built in the 1940s and 1950s, and is located in the same corridor. These transmission lines have been determined to not be NRHP eligible during previous projects.

Survey Markers

Survey markers were found throughout the Project area and are associated with the 1917 GLO survey. Some of these markers included associated linear disturbances that consist of two feet wide clearings around the survey markers; they were most likely made by the surveyors. A few campsites possibly identified by the GLO surveyors were also identified within the Project vicinity. Only one USGS survey marker was observed (Lerch et al. 2016). The survey markers were recorded as archaeological sites and they represent a single use event of the area.

Emplacements

The Project vicinity also contains remnants of various landscape modifications likely associated with active battles during the training maneuvers of WWII. Most appear to be fortified positions consisting of shallow dug-out depressions surrounded by low earthen berms and, occasionally, low walls of dry-stacked stones, and usually including only a few emplacements in a small area. One site within the Project area contains circular pits dug in a straight line that may have been used as tank emplacements during training activities (Lerch et al. 2016).

Multicomponent Sites

Several multicomponent sites were identified within the Project area. These sites were ones that no definitive temporal association could be assigned due to the presence of both historic and prehistoric period artifacts. Archival research was used to attempt to designate a period assignment to, but in some cases it was not possible. There are numerous sites within the DQSP Project area that contain both prehistoric and historical-period resources; however, if the majority of one resource type was present, SRI typically attempted to assign the site a prehistoric or historic designation. In these cases, the site description includes a mention of the other resources present.

Isolated Finds

Isolated finds consist of single, occasionally multiple, prehistoric or historical artifacts. Isolates have been found on a variety of surfaces, including desert pavement, gravel beds, and washes. For this Project, isolated finds were defined as two or fewer artifacts separated from other sites or artifacts by at least 30 m, or any group of artifacts more than three, if these artifacts could refit (e.g., a ceramic “pot drop” or a broken glass bottle). Isolated artifacts are typically determined not eligible for listing on the NRHP or CRHR, as they often lack integrity of location, setting, feeling, and association. However, some isolates may exhibit such integrity, and thus could be determined NRHP- or CRHR-eligible.

3.5.1.4 Archival and Library Research

Prior to conducting the field investigation, SRI completed archival research to fully investigate the background of the Project area. They consulted historical documents, historical maps, General Land Office (GLO) plat maps, aerial photographs, land patents, and land-entry files. Repositories and agencies visited included BLM, the County of Riverside, Transportation Survey Division, the Los Angeles Public Library, Nationwide Environmental Title Research, Palo Verde Irrigation District, U.S. Geological Survey, U.S. National Archives and Records Administration, National Archives at Riverside California, and Ancestry.com. Using the information gathered from archival resources, SRI was able to establish a historical context for the Project area that was useful for evaluating the historical resources present in DQSP.

3.5.1.5 Native American Coordination

SRI contacted the Native American Heritage Commission (NAHC) for a search of their Sacred Land Files during the 2016 Phase I study (Lerch et al. 2016). The search indicated that no known Native American Traditional Cultural Places (TCPs) were recorded within the Project area. The NAHC requested that SRI contact 36 tribal representatives to inquire about TCPs that might be known to the representatives and to solicit comments on the Project. An additional 15 contacts with traditional-use areas within the Project area were given to SRI by the BLM. SRI contacted all 51 individuals by sending them a letter with Project information. Responses from four tribes were received and three wished to engage in consultation. The contact program did not result in the identification of any previously known TCPs within the Project area. All contact with tribes was summarized in a separate ethnographic literature review (Kremkau, Whelan, et al. 2014) and responses were not included in the Phase I report. The BLM sent the consulting tribes a copy of the ethnographic literature review, as well as the research design (Kremkau, Stanton, et al 2014) for the Project prior to the field survey.

Representatives from the CRIT Office of Attorney General and CRIT Museum in Parker, Arizona met with SRI and First Solar on September 10, 2014 to discuss tribal participation in the field survey. On September 11, 2014, the BLM hosted a Project meeting that SRI, the CRIT Office of Attorney General, and the Mohave Elders Group attended. The field investigation was planned at this time and it was determined that a CRIT Native American Tribal Monitor would be present throughout the field survey.

County consultation under Assembly Bill 52 (AB 52) is not applicable to the Project because the date of the NOP for the DQSP was March 12, 2015, prior to the effective date of AB 52 on July 1, 2015. Although formal consultation under AB 52 is not required, the County did consult with interested Tribes. Notices regarding the Project were mailed to 11 Tribes who had requested notifications regarding projects located within their Traditional Use Areas. No responses were received from the Cabazon Band of Mission Indians, the Cahuilla Band of Indians, Ramona Band, Rincon Band of Luiseno Indians, Colorado River Indian Tribes, Morongo Band or the Torres Martinez Band of Cahuilla Indians. A response was received dated September 12, 2016 from the Pechanga Band of Luiseno Indians deferring to closer tribes. Three Tribes requested consultation. Details of this consultation are presented in Section 6.3.4.

3.5.2 Field Inventory Investigations

The SRI field investigation of the DQSP Project area occurred between October 2014 and April 2019. From October 2014 to December 2014, SRI conducted an intensive pedestrian survey of the original 5,010 acre Project area. Following the guidelines in Section 8110 of the BLM Manual, the Class III survey was an intensive pedestrian survey designed to identify all cultural properties “locatable from surface and exposed profile indications” within the “target area” defined by the Project disturbance areas (BLM 2004:19); this included the direct APE. The indirect APE was surveyed for built environment resources. The survey of the direct APE was conducted by qualified seven-person survey teams, each led by a qualified crew chief. A maximum survey interval of 15 m was employed, although crew members frequently walked between transect lines to record isolated artifacts and sites. After the initial pedestrian survey phase, site-recording teams of three people returned to the identified sites to record them in greater detail. A Native American Tribal Monitor from CRIT was present throughout the survey and the site recordation.

During the field survey, SRI identified 281 archaeological sites and 620 isolated artifacts (isolates) within the Project area (Table 3.5-1). An archaeological site was defined as any three or more artifacts found in association with one another. Isolates were defined as one or two artifacts or any group of artifacts more than three, if these artifacts could refit (e.g., a ceramic “pot drop” or a broken glass bottle), or from a cluster of shell casings from emptying a clip. One or two artifacts found in association with one another were treated as isolated finds. All sites were recorded on Department of Parks and Recreation (DPR) forms and submitted to the EIC for assignment of permanent trinomials. All isolated finds were recorded using DPR 523 forms, and at least one photograph was taken of each.

In addition to the 281 surveyed sites, an additional 10 sites and one isolate previously surveyed and located in the Project vicinity were identified. The 10 additional sites are also listed in Table 3.5-1. This includes 5 prehistoric sites, 4 historic sites, and 1 multicomponent site. Of the prehistoric sites, these contained 2 geoglyph/petroglyph sites and 3 trails. The historical-period sites consist of 2 debris scatters and 2 transmission lines. The multicomponent site was a trail with debris scatter. Of the 10 additional sites, 2 are listed, 4 are determined to be eligible, 4 are determined to be not eligible.

Additional fieldwork conducted for the project included a site visit by archaeologists from SRI and BLM in February 2015, and in April 2018, limited testing and NRHP/CRHR eligibility evaluations by SRI of three prehistoric sites identified during the inventory effort. Soil samples were collected at each of the sites for floatation and analysis; artifacts found during the excavations were documented, but not collected. In April 2019, the total Project area was increased to 5,034 acres. Intensive pedestrian survey was conducted by SRI for the realignment of the gen-tie line, and three sites previously located outside of the direct APE were revisited and recorded on DPR forms. A Native American Tribal Monitor from CRIT was present during the testing and additional survey fieldwork.

In total, the 291 archaeological sites include 95 prehistoric sites, 186 historical-period sites, and 10 multicomponent sites. Of the prehistoric sites, these contained 60 thermal features, 8 ceramic scatters, 2 combined ceramic/lithic scatters, 16 lithic scatters, 1 rock feature, 1 geoglyph, 1 petroglyph, and 6 trail segments. The majority of the thermal features included associated artifacts. The historical-period sites consist of 2 temporary camps, 9 trails/roads, 3 wells, 155 debris scatters, 5 communication wire dump sites, 2 survey marker sites, 1 guy wire, 1 set of tank tracks, 5 refuse

scatter sites, 2 transmission lines, and 1 military emplacement. Of the multicomponent sites, 9 were prehistoric artifact and historic debris scatters, and 1 was a prehistoric rock feature with a historic debris scatter.

According to the current ROW configuration, 18 eligible sites and 2 listed sites fall within the Project area and may also be impacted by the Project through direct or indirect impacts. All of the archaeological sites are located on land managed by the BLM. Based on Appendix B in the Addendum of the SRI report, two of the sites which make up the Mule Tank Discontiguous Rock Art District are listed on the NRHP.

Table 3.5-1. Archaeological Sites Within the APE

Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-000343	CA-RIV-343	SRI-9003	Prehistoric	Trail	BLM	Eligible
33-000053	CA-RIV-53T	Not surveyed by SRI	Prehistoric	Trail	BLM	Eligible
33-000650	CA-RIV-650T	Not surveyed by SRI	Prehistoric	Trail	BLM	Eligible
33-000673	CA-RIV-673	Not surveyed by SRI	Multicomponent	Trails; debris scatter	BLM	Eligible
33-003803	CA-RIV-3803T	Not surveyed by SRI	Prehistoric	Trail	BLM	Eligible
33-011110	-	Not surveyed by SRI	Historic	Transmission Line	BLM	Not Eligible
33-012532	CA/RIV-7127H	Not surveyed by SRI	Historic	Transmission Line	BLM	Not Eligible
33-014148	-	Not surveyed by SRI	Historic	Debris scatter	BLM	Not eligible
33-014174	-	Not surveyed by SRI	Historic	Debris scatter	BLM	Not eligible
33-019676	CA-RIV-9991	SRI-1004	Prehistoric	Ceramic scatter	BLM	Destroyed
33-019714	CA-RIV-10028	SRI-1005	Multicomponent	1942-1944 refuse scatter; lithic scatter	BLM	Destroyed
33-019797	CA-RIV-10080	SRI-1006	Historic	Refuse scatter	BLM	Destroyed
33-000504	CA-RIV-504	Not surveyed by SRI	Prehistoric	petroglyph	BLM	Listed
33-000773	CA-RIV-773	Not surveyed by SRI	Prehistoric	Geoglyph/intaglio	BLM	Listed
33-018916	CA-RIV-10078	SRI-140	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024356	CA-RIV-011990	SRI-1059	Prehistoric	Thermal rock features with lithic scatter	BLM	Eligible
33-024804	CA-RIV-12294	SRI-2	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024678	CA-RIV-12209	SRI-3	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024805	CA-RIV-12295	SRI-7	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024810	CA-RIV-12300	SRI-9	Historic, 1942-1944	Debris scatter	BLM	Not eligible

Table 3.5-1. Archaeological Sites Within the APE

Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-024719	CA-RIV-12240	SRI-17	Prehistoric, Patayan II	Thermal rock features with lithic scatter	BLM	Eligible
33-024806	CA-RIV-12296	SRI-18	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024807	CA-RIV-12297	SRI-19	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024808	CA-RIV-12298	SRI-21	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024809	CA-RIV-12299	SRI-25	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024270	CA-RIV-11924	SRI-26	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024271	CA-RIV-11925	SRI-27	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024272	CA-RIV-11926	SRI-29	Prehistoric	Rock feature with associated artifacts	BLM	Not eligible
33-024273	CA-RIV-11927	SRI-36	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024308	CA-RIV-11962	SRI-42	Historic, Post-1944	Wells and associated artifacts	BLM	Not eligible
33-024274	CA-RIV-11928	SRI-52	Prehistoric, Patayan I/II	Ceramic and lithic scatter	BLM	Not eligible
33-024275	CA-RIV-11929	SRI-58	Prehistoric	Thermal rock features with associated artifacts	BLM	Not eligible
33-024276	CA-RIV-11930	SRI-61	Prehistoric	Thermal rock feature with associated artifact	BLM	Not eligible
33-024277	CA-RIV-11931	SRI-63	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-024278	CA-RIV-11932	SRI-65	Prehistoric, Patayan III	Thermal rock features with associated artifacts	BLM	Not eligible
33-024279	CA-RIV-11933	SRI-69	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-024280	CA-RIV-11934	SRI-71	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024281	CA-RIV-11935	SRI-75	Prehistoric	Thermal rock features with associated artifact	BLM	Not eligible
33-024282	CA-RIV-11936	SRI-81	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024283	CA-RIV-11937	SRI-83	Prehistoric, Patayan II/III	Thermal rock features with associated artifacts	BLM	Eligible
33-024284	CA-RIV-11938	SRI-96	Historic	Road/Trail	BLM	Not eligible
33-024309	CA-RIV-11963	SRI-119	Historic, 1942-1944	Communication wire	BLM	Not eligible
33-024310	CA-RIV-11965	SRI-120	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024311	CA-RIV-11966	SRI-121	Historic	Road/Trail	BLM	Not eligible
33-024312	CA-RIV-11967	SRI-122	Historic	Road/Trail	BLM	Not eligible

Table 3.5-1. Archaeological Sites Within the APE

Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-024285	CA-RIV-11939	SRI-124	Prehistoric, Patayan II	Thermal rock feature with ceramic scatter	BLM	Not eligible
33-024286	CA-RIV-11940	SRI-125	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024287	CA-RIV-11941	SRI-129	Historic	Road/Trail	BLM	Not eligible
33-024288	CA-RIV-11942	SRI-132	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024289	CA-RIV-11943	SRI-133	Prehistoric, Patayan III	Thermal rock feature with associated artifacts	BLM	Not eligible
33-024290	CA-RIV-11944	SRI-134	Prehistoric	Thermal rock feature with lithic scatter	BLM	Not eligible
33-024291	CA-RIV-11945	SRI-137	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024292	CA-RIV-11946	SRI-138	Historic	Debris scatter	BLM	Not eligible
33-024293	CA-RIV-11947	SRI-147	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024294	CA-RIV-11948	SRI-1001	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024295	CA-RIV-11949	SRI-1009	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024296	CA-RIV-11950	SRI-1011	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024297	CA-RIV-11951	SRI-1014	Prehistoric, Patayan II	Thermal rock feature with associated artifacts	BLM	Not eligible
33-024298	CA-RIV-11952	SRI-1021	Historic	Debris scatter	BLM	Not eligible
33-024299	CA-RIV-11953	SRI-1024	Historic, Pre-1942	Campfire with artifact concentration	BLM	Not eligible
33-024300	CA-RIV-11954	SRI-1025	Prehistoric	Fire affected rock (FAR) scatter	BLM	Not eligible
33-024301	CA-RIV-11955	SRI-1035	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024302	CA-RIV-11956	SRI-1037	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-024303	CA-RIV-11957	SRI-1043	Prehistoric	Thermal rock feature with associated artifact	BLM	Not eligible
33-024304	CA-RIV-11958	SRI-1049	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-024305	CA-RIV-11959	SRI-1053	Prehistoric, Patayan III	Thermal rock features with associated artifacts	BLM	Not eligible
33-024306	CA-RIV-11960	SRI-1056	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024307	CA-RIV-11961	SRI-1058	Prehistoric, Patayan I/II	Thermal rock features with associated artifacts	BLM	Not eligible
33-024357	CA-RIV-11991	SRI-1061	Prehistoric, Patayan I/II	Ceramic scatter	BLM	Not eligible
33-024358	CA-RIV-11992	SRI-1070	Historic, Post-1944	Debris scatter	BLM	Not eligible

Table 3.5-1. Archaeological Sites Within the APE

Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-024313	CA-RIV-11968	SRI-1076	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024314	CA-RIV-11969	SRI-2001	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024315	CA-RIV-11970	SRI-2007	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024316	CA-RIV-11971	SRI-2008	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024317	CA-RIV-11972	SRI-2009	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024359	CA-RIV-11993	SRI-2014	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024360	CA-RIV-11994	SRI-2017	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024361	CA-RIV-11995	SRI-2021	Prehistoric, Patayan II/III	Thermal rock features with associated artifacts	BLM	Eligible
33-024362	CA-RIV-11996	SRI-2023	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024363	CA-RIV-11997	SRI-2029	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024318	CA-RIV-11973	SRI-2030	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024319	CA-RIV-11974	SRI-2034	Prehistoric	Thermal rock feature	BLM	Not eligible
33-024364	CA-RIV-11998	SRI-2035	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-024365	CA-RIV-11999	SRI-2042	Prehistoric	Lithic scatter	BLM	Not eligible
33-024366	CA-RIV-12000	SRI-2051	Historic	Road/Trail	BLM	Not eligible
33-024320	CA-RIV-11975	SRI-2066	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024367	CA-RIV-12001	SRI-2067	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024368	CA-RIV-12002	SRI-2068	Multicomponent	Artifact and debris scatter	BLM	Not eligible
33-024321	CA-RIV-11976	SRI-2082	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024322	CARIV-11977	SRI-2088	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024323	CA-RIV-11978	SRI-2094	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024324	CA-RIV-11979	SRI-2098	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024325	CA-RIV-11980	SRI-2100	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024369	CA-RIV-12003	SRI-2128	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-024370	CA-RIV-12004	SRI-2135	Historic, 1942-1944	Military pits	BLM	Not eligible
33-024371	CA-RIV-12005	SRI-2136	Prehistoric, Patayan I/II	Ceramic scatter	BLM	Not eligible
33-024372	CA-RIV-12006	SRI-2329	Prehistoric, Patayan II	FAR scatter with associated artifacts	BLM	Not eligible
33-024355	CA-RIV-11989	SRI-2333	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-024373	CA-RIV-12007	SRI-2582	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024326	CA-RIV-11981	SRI-3007	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024327	CA-RIV-11982	SRI-3010	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024374	CA-RIV-12008	SRI-3014	Historic, Pre-1942	Campfire with debris scatter	BLM	Not eligible
33-024375	CA-RIV-12009	SRI-3015	Multicomponent	Artifact and debris scatter	BLM	Not eligible

Table 3.5-1. Archaeological Sites Within the APE

Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-024376	CA-RIV-12010	SRI-3017	Prehistoric	Thermal rock feature	BLM	Not eligible
33-024377	CA-RIV-12011	SRI-3019	Prehistoric, Patayan II	Thermal rock features with associated artifacts	BLM	Not eligible
33-024378	CA-RIV-12012	SRI-3020	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024379	CA-RIV-12013	SRI-3022	Prehistoric	Thermal rock feature with associated artifact	BLM	Not eligible
33-024380	CA-RIV-12014	SRI-3027	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024381	CA-RIV-12015	SRI-3029	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024382	CA-RIV-12016	SRI-3031	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024383	CA-RIV-12017	SRI-3037	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024384	CA-RIV-12018	SRI-3038	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024385	CA-RIV-12019	SRI-3039	Prehistoric	Thermal rock features	BLM	Eligible
33-024386	CA-RIV-12020	SRI-3040	Prehistoric	Thermal rock features with lithic scatter	BLM	Not eligible
33-024387	CA-RIV-12021	SRI-3041	Prehistoric	Thermal rock features with associated artifacts	BLM	Not eligible
33-024388	CA-RIV-12022	SRI-3042	Prehistoric	Thermal rock features with associated artifacts	BLM	Not eligible
33-024389	CA-RIV-12023	SRI-3045	Prehistoric	Thermal rock feature with associated artifacts	BLM	Not eligible
33-024390	CA-RIV-12024	SRI-3047	Prehistoric	Thermal rock feature	BLM	Not eligible
33-024423	CA-RIV-12055	SRI-3054	Historic, 1942-1944	Refuse scatter (ammunition)	BLM	Not eligible
33-024424	CA-RIV-12056	SRI-3057	Prehistoric	Lithic scatter	BLM	Not eligible
33-024425	CA-RIV-12057	SRI-3059	Prehistoric, Patayan II/III	Ceramic scatter	BLM	Not eligible
33-024426	CA-RIV-12058	SRI-3078	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024349	CA-RIV-11983	SRI-3101	Prehistoric, Patayan I/II	Thermal rock feature with associated artifacts	BLM	Not eligible
33-024350	CA-RIV-11984	SRI-3103	Historic	Debris scatter	BLM	Not eligible
33-024351	CA-RIV-11985	SRI-3108	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024352	CA-RIV-11986	SRI-3115	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024353	CA-RIV-11987	SRI-3116	Historic, 1942-1944	Debris scatter	BLM	Not eligible

Table 3.5-1. Archaeological Sites Within the APE

Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-024354	CA-RIV-11988	SRI-3117	Historic	Debris scatter	BLM	Not eligible
33-024427	CA-RIV-12059	SRI-3119	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024428	CA-RIV-12060	SRI-3123	Historic, 1942-1944	Refuse scatter	BLM	Not eligible
33-024429	CA-RIV-12061	SRI-3124	Historic, 1942-1944	Refuse scatter	BLM	Not eligible
33-024430	CA-RIV-12062	SRI-3127	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024431	CA-RIV-12063	SRI-3135	Prehistoric	Lithic scatter	BLM	Not eligible
33-024432	CA-RIV-12064	SRI-3147	Prehistoric	Lithic scatter	BLM	Not eligible
33-024433	CA-RIV-12065	SRI-3155	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024434	CA-RIV-12066	SRI-3156	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024435	CA-RIV-12067	SRI-3158	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024391	CA-RIV-12025	SRI-3175	Prehistoric	Thermal rock features	BLM	Not eligible
33-024436	CA-RIV-12068	SRI-3186	Prehistoric, Patayan II/III	Ceramic scatter	BLM	Not eligible
33-024437	CA-RIV-12069	SRI-3205	Prehistoric	Thermal rock feature	BLM	Not eligible
33-024392	CA-RIV-12026	SRI-3211	Prehistoric	Thermal rock features with associated artifacts	BLM	Not eligible
33-024438	CA-RIV-12070	SRI-3224	Prehistoric	Thermal rock feature	BLM	Not eligible
33-024439	CA-RIV-12071	SRI-3228	Prehistoric, Patayan II/III	Ceramic and lithic scatter	BLM	Not eligible
33-024393	CA-RIV-12027	SRI-3237	Prehistoric	Thermal rock features	BLM	Not Eligible
33-024394	CA-RIV-12028	SRI-3255	Prehistoric	Trail	BLM	Eligible
33-024395	CA-RIV-12029	SRI-3256	Multicomponent	Artifact and debris scatter	BLM	Not eligible
33-024396	CA-RIV-12030	SRI-3260	Multicomponent	Artifact and debris scatter	BLM	Not eligible
33-024440	CA-RIV-12072	SRI-3306	Prehistoric	Lithic scatter	BLM	Not eligible
33-024441	CA-RIV-12073	SRI-3331	Prehistoric	Thermal rock feature	BLM	Not eligible
33-024442	CA-RIV-12074	SRI-3487	Prehistoric	Thermal rock features with associated artifacts	BLM	Not eligible
33-024397	CA-RIV-12031	SRI-4004	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024398	CA-RIV-12032	SRI-4005	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024443	CA-RIV-12075	SRI-4014	Prehistoric	Thermal rock features	BLM	Not eligible
33-024444	CA-RIV-12076	SRI-4016	Prehistoric, Patayan II	Thermal rock feature with associated artifacts	BLM	Not eligible

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Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-024445	CA-RIV-12077	SRI-4017	Multicomponent	Rock feature and debris scatter	BLM	Not eligible
33-024446	CA-RIV-12078	SRI-4019	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024447	CA-RIV-12079	SRI-4024	Prehistoric	Lithic scatter	BLM	Not eligible
33-024448	CA-RIV-12080	SRI-4028	Historic	Debris scatter	BLM	Not eligible
33-024449	CA-RIV-12081	SRI-4034	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024450	CA-RIV-12082	SRI-4041	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024399	CA-RIV-12033	SRI-4045	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-024451	CA-RIV-12083	SRI-4054	Prehistoric	Thermal rock feature with associated artifacts	BLM	Not eligible
33-024452	CA-RIV-12084	SRI-4056	Prehistoric	Thermal rock features with lithic scatter	BLM	Not eligible
33-024453	CA-RIV-12085	SRI-4060	Multicomponent	Artifact and debris scatter	BLM	Not eligible
33-024454	CA-RIV-12086	SRI-4063	Prehistoric	Thermal rock feature with associated artifacts	BLM	Not eligible
33-024455	CA-RIV-12087	SRI-4078	Prehistoric, Patayan II	Ceramic scatter	BLM	Not eligible
33-024456	CA-RIV-12088	SRI-4079	Prehistoric	Thermal rock features with associated artifacts	BLM	Not eligible
33-024457	CA-RIV-12089	SRI-4080	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024458	CA-RIV-12090	SRI-4084	Prehistoric	FAR scatter with associated artifacts	BLM	Not eligible
33-024459	CA-RIV-12091	SRI-4085	Prehistoric, Patayan III	Thermal rock features	BLM	Eligible
33-024460	CA-RIV-12092	SRI-4098	Historic	Debris scatter	BLM	Not eligible
33-024400	CA-RIV-12034	SRI-4116	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024401	CA-RIV-12035	SRI-4127	Historic	Debris scatter	BLM	Not eligible
33-024402	CA-RIV-12036	SRI-4145	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024403	CA-RIV-12037	SRI-4151	Historic	Debris scatter	BLM	Not eligible
33-024404	CA-RIV-12038	SRI-4160	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024405	CA-RIV-12039	SRI-4162	Historic, 1942-1944	Communication wire	BLM	Not eligible
33-024406	CA-RIV-12040	SRI-4167	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024461	CA-RIV-12093	SRI-4175	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024462	CA-RIV-12094	SRI-4178	Historic	Refuse scatter	BLM	Not eligible
33-024463	CA-RIV-12095	SRI-4180	Historic, 1942-1944	Guy wire	BLM	Not eligible
33-024464	CA-RIV-12096	SRI-4182	Historic, 1942-1944	Debris scatter	BLM	Not eligible

Table 3.5-1. Archaeological Sites Within the APE

Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-024465	CA-RIV-12097	SRI-4185	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-024466	CA-RIV-12098	SRI-4186	Historic	Debris scatter	BLM	Not eligible
33-024467	CA-RIV-12099	SRI-4191	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024468	CA-RIV-12100	SRI-4196	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024469	CA-RIV-12101	SRI-4208	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024470	CA-RIV-12102	SRI-4217	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024471	CA-RIV-12103	SRI-4222	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024472	CA-RIV-12104	SRI-4229	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024473	CA-RIV-12105	SRI-4231	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024474	CA-RIV-12106	SRI-4235	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024475	CA-RIV-12107	SRI-4236	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024476	CA-RIV-12108	SRI-4241	Prehistoric	Thermal rock features with lithic scatter	BLM	Eligible
33-024477	CA-RIV-12109	SRI-4242	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024478	CA-RIV-12110	SRI-4248	Historic	Debris scatter	BLM	Not eligible
33-024479	CA-RIV-12111	SRI-4250	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024407	CA-RIV-12041	SRI-5000	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024408	CA-RIV-12042	SRI-5003	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024409	CA-RIV-12043	SRI-5006	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024410	CA-RIV-12044	SRI-5008	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024480	CA-RIV-12112	SRI-5029	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024481	CA-RIV-12113	SRI-5034	Prehistoric	Thermal rock feature with associated artifacts	BLM	Not eligible
33-024482	CA-RIV-12114	SRI-5035	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024483	CA-RIV-12115	SRI-5054	Prehistoric	Thermal rock feature with associated artifact	BLM	Not eligible
33-024411	CA-RIV-12045	SRI-5063	Historic	Survey marker	BLM	Not eligible
33-024412	CA-RIV-12046	SRI-5067	Prehistoric	Thermal rock features with lithic scatter	BLM	Not eligible
33-024413	CA-RIV-12047	SRI-5070	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024414	CA-RIV-12048	SRI-5073	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-024415	CA-RIV-12049	SRI-5076	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024484	CA-RIV-12116	SRI-5083	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024485	CA-RIV-12117	SRI-5087	Historic	Debris scatter	BLM	Not eligible
33-024486	CA-RIV-12118	SRI-5099	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024487	CA-RIV-12119	SRI-5106	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024488	CA-RIV-12120	SRI-5132	Historic	Debris scatter	BLM	Not eligible

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Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-024489	CA-RIV-12121	SRI-5135	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024416	CA-RIV-12050	SRI-6003	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024417	CA-RIV-12051	SRI-6005	Historic	Debris scatter	BLM	Not eligible
33-024490	CA-RIV-12122	SRI-6011	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024491	CA-RIV-12123	SRI-6017	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024492	CA-RIV-12124	SRI-6018	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024493	CA-RIV-12125	SRI-6021	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024494	CA-RIV-12126	SRI-6022	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024495	CA-RIV-12127	SRI-6023	Prehistoric, Patayan II	Thermal rock features with associated artifacts	BLM	Not eligible
33-024496	CA-RIV-12128	SRI-6033	Prehistoric	Thermal rock features with lithic scatter	BLM	Eligible
33-024497	CA-RIV-12129	SRI-6034	Prehistoric, Patayan II/III	Thermal rock features with associated artifacts	BLM	Eligible
33-024498	CA-RIV-12130	SRI-6046	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024418	CA-RIV-12052	SRI-6053	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024499	CA-RIV-12131	SRI-6059	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024419	CA-RIV-12053	SRI-6075	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024500	CA-RIV-12132	SRI-6081	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024501	CA-RIV-12133	SRI-6087	Historic	Debris scatter	BLM	Not eligible
33-024502	CA-RIV-12134	SRI-6096	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024503	CA-RIV-12135	SRI-6100	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024504	CA-RIV-12136	SRI-6104	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024505	CA-RIV-12137	SRI-6114	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024506	CA-RIV-12138	SRI-6115	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024507	CA-RIV-12139	SRI-6119	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024508	CA-RIV-12140	SRI-6471	Prehistoric	FAR scatter	BLM	Not eligible
33-024509	CA-RIV-12141	SRI-6491	Prehistoric	Lithic scatter	BLM	Not eligible
33-024510	CA-RIV-12142	SRI-7008	Prehistoric, Patayan II	Thermal rock features with associated artifacts	BLM	Not eligible
33-024511	CA-RIV-12143	SRI-7009	Prehistoric	Thermal rock feature	BLM	Not eligible
33-024512	CA-RIV-12144	SRI-7010	Prehistoric	Thermal rock feature with associated artifacts	BLM	Not eligible
33-024513	CA-RIV-12145	SRI-7018	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024514	CA-RIV-12146	SRI-7019	Prehistoric	Lithic scatter	BLM	Not eligible
33-024515	CA-RIV-12147	SRI-7020	Historic, 1942-1944	Debris scatter	BLM	Not eligible

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Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-024420	CA-RIV-12054	SRI-7024	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024516	CA-RIV-12148	SRI-7029	Prehistoric	Thermal rock feature	BLM	Not eligible
33-024517	CA-RIV-12149	SRI-7031	Prehistoric, Patayan II	Thermal rock features with associated artifacts	BLM	Not eligible
33-024518	CA-RIV-12150	SRI-7040	Prehistoric	Thermal rock feature with associated artifact	BLM	Not eligible
33-024519	CA-RIV-12151	SRI-7060	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-024520	CA-RIV-12152	SRI-7065	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024521	CA-RIV-12153	SRI-7066	Prehistoric	Thermal rock features with lithic scatter	BLM	Not eligible
33-024522	CA-RIV-12154	SRI-7072	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024523	CA-RIV-12155	SRI-7074	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-024524	CA-RIV-12156	SRI-7076	Historic, 1942-1944	Communication wire	BLM	Not eligible
33-024525	CA-RIV-12157	SRI-7087	Historic, 1942-1944	Communication wire	BLM	Not eligible
33-024526	CA-RIV-12158	SRI-8085	Historic, Pre-1942	Survey markers with associated linear features and artifacts	BLM	Not eligible
33-024818	CA-RIV-12307	SRI-9016	Historic, Post-1944	Well	BLM	Not eligible
33-024813	CA-RIV-12303	SRI-9018	Historic, Post-1944	Well	BLM	Not eligible
33-024817	CA-RIV-12306	SRI-9020	Historic	Road/Trail	BLM	Not eligible
33-000772	CA-RIV-772	SRI-110	Prehistoric	Trail	BLM	Eligible
33-001821	CA-RIV-1821	SRI-8020	Prehistoric	Thermal rock features with associated artifacts	BLM	Eligible
33-002795	CA-RIV-2795	SRI-3149	Prehistoric	Lithic scatter	BLM	Not eligible
33-002796	CA-RIV-2796	SRI-6523	Prehistoric	Lithic scatter	BLM	Not eligible
33-008133	CA-RIV-6043	SRI-16	Prehistoric	Lithic scatter	BLM	Not eligible
33-008134	CA-RIV-6044	SRI-6025	Prehistoric, Patayan II	Ceramic scatter	BLM	Not eligible
33-013660	-	SRI-3273	Prehistoric	Thermal rock features with associated artifacts	BLM	Not eligible
33-014147	-	SRI-101	Historic, 1942-1944	Communication wire	BLM	Not eligible
33-014151	-	SRI-3408	Prehistoric, Patayan II/III	Ceramic scatter	BLM	Not eligible

Table 3.5-1. Archaeological Sites Within the APE

Primary Number	Trinomial	Temporary Number	Age	Description	Land Ownership	NRHP / CRHR Eligibility Status
33-014173	CA-RIV-9097	SRI-9013	Historic	Road/Trail	BLM	Not eligible
33-014198	-	SRI-1073	Historic, Pre-1942	Debris scatter	BLM	Not eligible
33-014199	CA-RIV-9098	SRI-107	Historic	Road/Trail	BLM	Not eligible
33-017317	CA-RIV-9007	SRI-6519	Prehistoric	Lithic scatter	BLM	Not eligible
33-017328	-	SRI-1068	Historic, Pre-1942	Road/Trail	BLM	Not eligible
33-018675	CA-RIV-10077	SRI-2668	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-018852	CA-RIV-9648	SRI-5108	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-018853	CA-RIV-9649	SRI-146	Historic	Debris scatter	BLM	Not eligible
33-019021	CA-RIV-9810	SRI-5109	Prehistoric	Lithic scatter	BLM	Not eligible
33-019618	CA-RIV-9935	SRI-127	Multicomponent	Artifact and debris scatter	BLM	Eligible
33-019733	CA-RIV-10047	SRI-4207	Prehistoric	Lithic scatter	BLM	Not eligible
33-019734	CA-RIV-10048	SRI-4173	Multicomponent	Artifact and debris scatter	BLM	Not eligible
33-019735	CA-RIV-10049	SRI-4172	Prehistoric	Lithic scatter	BLM	Not eligible
33-019736	CA-RIV-10050	SRI-4211	Historic	Debris scatter	BLM	Not eligible
33-019739	CA-RIV-10053	SRI-139	Prehistoric	Lithic scatter	BLM	Not eligible
33-019740	CA-RIV-10054	SRI-2113	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-019741	CA-RIV-10055	SRI-4203	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-019742	CA-RIV-10056	SRI-4209	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-019743	CA-RIV-10057	SRI-5122	Historic, 1942-1944	Debris scatter	BLM	Not eligible
33-021132	CA-RIV-10964	SRI-1010	Historic, Post-1944	Debris scatter	BLM	Not eligible
33-021264	CA-RIV-11057	SRI-2322	Historic, 1942-1944	Tank tracks	BLM	Not eligible

SRI recorded 620 isolated finds within the Project area, and 1 additional isolate was identified by BLM. The isolates included 463 historical-period isolates and 158 prehistoric isolates. Due to the large number of isolates, they were not listed in detail in the Phase I report, only summarized in tabular form. Historical-period isolates observed included ration cans, food/beverage cans, jars, bottles, shell shirt buttons, ammunition, a grenade, an ammunition door from a ball turret, tools, wire, utensils, and oil filters. The prehistoric isolates consist of 86 pot drops and 71 flaked stone artifacts, such as flakes, tested cobbles, a projectile point, hammerstones, and choppers. One chert projectile point, possibly a Gypsum point, was recorded on the southeastern edge of the Project. The pot drops contained a range of ceramic types and they consisted of anywhere from two to 87 sherds. If additional ceramic sherds are located in a shallow subsurface context, that would not change the eligibility determination.

Isolated artifacts are usually not eligible for listing on the NRHP due to their limited potential for further research and their lack of context and integrity. However, in some cases isolated resources could indicate hidden subsurface cultural resources.

Survey for Built-Environment Resources

Fourteen built-environment resources were identified, including two transmission lines, nine trails/roads, and three wells. The two transmission lines were identified within the indirect APE along the southeastern boundary of the DQSP. These lines are the Pilot Knob–Blythe 161-kV transmission line (P-33-11110) and the Blythe–Niland 161-kV transmission line (P-33-012532/CA-RIV-7127H). The Pilot Knob–Blythe 161-kV transmission line (P-33-11110) is a 64.4-mile-long line made of H-frame wooden poles built in 1951 that parallels the 2-mile-long boundary of the DQSP. The Blythe–Niland 161-kV transmission line (P-33-012532/CA-RIV-7127H) is a line of similar wooden-pole H-frame construction built in the 1940s and 1950s and located in the same corridor. Both transmission lines have been determined to not be eligible for listing in the NRHP and CRHR. The nine trails/roads and three wells have been determined to not be eligible for listing in the NRHP and CRHR.

Landscape-level Studies and Geoarchaeological Investigations

SRI utilized soil survey maps, landform age, landscape features, depositional environments, and a previous geoarchaeological investigation and site sensitivity mapping project to analyze the sensitivity for buried deposits within the Project area. The project used was ASM’s 1998 Class II survey of the Palo Verde Mesa and Palo Verde Valley Catellus/BLM Land Exchange Project, which covered a portion of the current Project area (McDonald and Schaefer 1998). ASM examined geomorphology and site density from their study area to create a site sensitivity model for the region. The model has four levels of sensitivity- high, medium, low, and none. ASM assigned the high level to area near rock outcroppings in the upland areas of the valley, roads, and springs. Medium level of sensitivity included slopes near the high level. The late Holocene alluvial formations were assigned a low level of sensitivity. Finally, no sensitivity levels were given to active dunes or areas disturbed by agriculture.

SRI employed the ASM model when analyzing the DQSP Project area. However, after factoring in the soil survey map, landform ages, and landscape features, such as arroyos or playas, ASM’s model was found to be inaccurate within DQSP. SRI identified five soil series types within the Project area: Aco, Carrizo, Chuckawalla, Orita, and Rositas. The Chuckawalla series retains a low sensitivity, while the Aco and Carrizo series have a moderate sensitivity. The majority of the Project area contains the Aco soil series, while the Chuckawalla and Carrizo soil series are limited to the north of the Project. The Orita and Rositas soil series were identified with a high potential for buried deposits. The highly sensitivity Orita soil series was found within the central portion of the Project site, while the Rositas series is only within the northern portion of the Project. Within the Rositas soil series, buried cultural deposits may be found at 150 cm or more below the surface, while cultural deposits may be encountered at 50 to 60 cm below the surface in the Orita series (Lerch et al. 2016). Further investigations, such as geoarchaeological trenching of the Rositas and Orita soil series, would be completed to confirm the subsurface sensitivity assessments for cultural resources.

Traditional Cultural Properties and Tribal Cultural Resources

Traditional Cultural Properties (TCPs) are sites associated with cultural practices or beliefs of a living community that (a) are rooted in the community’s history and (b) are important in maintaining the continuing cultural identity of the community and may be eligible for inclusion in

the National Register. Tribal cultural resources (TCRs) include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Tribe. To qualify as a TCR, the resource must either: (1) be listed on, or be eligible for listing on, the California Register of Historical Resources or other local historic register; or (2) constitute a resource that the lead agency, at its discretion and supported by substantial evidence, determines should be treated as a TCR (PRC § 21074(a)(2)). Native American tribes that are traditionally and culturally affiliated with a geographic area can provide lead agencies with expert knowledge of TCRs.

Through government-to-government consultation, BLM has identified that the Mule Tank Discontiguous Rock Art District (P-33-001821) is of special significance to the Tribes. Although formal consultation under Assembly Bill 52 (AB 52) is not required, the County also consulted with interested Tribes. In a letter dated November 18, 2016, the Tribal Historic Preservation Office (THPO) of the Twenty-Nine Palms Band of Mission Indians described the Project as being located within the boundary of its Traditional Use Area. The Tribe requested ongoing consultation associated with the archaeological sites determined to be eligible and possibly eligible for the NRHP and CRHR, as well as a culturally sensitive site crossed by the Project, and a culturally sensitive area in the vicinity of the Project. In a letter dated May 16, 2018, the Tribe described the culturally sensitive site and the culturally sensitive area as TCRs that have a cultural value to the Tribe.

Addendum 2 to the Class III Archaeological Survey Report suggested that site P-33-001821 might be a TCP eligible for inclusion in the National Register, and as a TCR under CEQA. BLM has requested additional from the Tribes in an effort to identify any link between the significant features and significant events, patterns, or trends in prehistory, to better understand the role of the Mule Mountains in historically rooted beliefs, customs, and practices of the Tribes.

3.6 Environmental Justice

The study area is defined by the boundaries of several planning areas for which demographic data are available and which encompass the potentially affected area for environmental justice, including communities for which human health and safety impacts may exist. Data on minority populations and low income populations who may be impacted by the Project are provided for these planning areas, including the City of Blythe, nearby Census County Divisions (Chuckwalla Valley and Blythe), and Riverside County for regional context.

The Project site is located in Chuckwalla Census County Division (CCD) (a county subdivision defined by the U.S. Census) in eastern Riverside County, approximately 2.75 miles west of the City of Blythe. The site and its immediately adjoining areas are vacant, with no existing population. Data on minority populations and incidence of poverty are provided for Riverside County, Chuckwalla Valley CCD, Blythe CCD, and the City of Blythe. Chuckwalla Valley CCD and Blythe CCD together correspond generally to “Eastern Riverside County,” as defined in the Riverside County General Plan (Riverside County 2015a).

Chuckwalla Valley CCD is a sparsely populated, rural area of Riverside County, bordered by the Coachella Valley to the west and Blythe CCD and the California-Arizona border to the east. Its largest population center consists of two state prisons (Ironwood and Chuckawalla Valley State Prisons), which have been annexed to the City of Blythe, and its largest non-institutional community is Desert Center, located approximately 37 miles west of the Project site. Blythe CCD includes the City of Blythe, community of Ripley, and the surrounding agricultural areas, but excludes the two state prisons.

La Paz County in Arizona is located east of Blythe CCD. Its largest cities are Parker and Quartzsite; the community of Ehrenberg is also located in the County, 4 miles east of Blythe and across the Colorado River. The Colorado River Indian Reservation is located mostly in La Paz County and partly in Riverside County. The Reservation extends along the river north of Ehrenberg and includes the City of Parker. Although most of the Reservation would be unaffected by the Project, demographic and income data have been included, since sections of the Reservation are located in Blythe CCD.

The environmental justice analysis discusses the populations residing in U.S. Census tracts 459, 461.01, 461.02, 461.03, 462, 469, 9810, Blythe City, Blythe CCD, Chuckwalla CCD, and the Colorado River Indian Reservation (see Figure 3.6-1).

3.6.1 Minority Populations

According to the Council on Environmental Quality (CEQ), minority individuals are defined as members of the following groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black/African-American, not of Hispanic origin; or Hispanic (of any race). A minority population, for the purposes of environmental justice, is identified when the minority population of the potentially affected area is greater than 50 percent or meaningfully greater than the percentage of the minority population in the general population or other appropriate unit of geographical analysis (CEQ 1997). According to the CEQ guidelines, “minority” is defined as all persons except non-Hispanic whites. In other words, minority is defined as all racial groups other than white, and all persons of Hispanic origin, regardless of race.

Table 3.6-1 presents the minority population composition of the planning areas surrounding the Project site and other regional data for context, based on the 2009-2013 American Community Survey. Data are provided for U.S. Census tracts 459, 461.01, 461.02, 461.03, 462, 469, 9810, Blythe City, Blythe CCD, Chuckwalla CCD, and the Colorado River Indian Reservation, as well as Riverside and La Paz Counties.

The Chuckwalla Valley CCD, in which the Project is located, has a minority population, defined as racial or ethnic groups other than non-Hispanic White, of 76.7 percent of the population. This percentage is higher than Riverside County as a whole (61.7 percent) and the Blythe CCD (68.5 percent), but is similar to the percentage for the City of Blythe (71.9 percent). Only one of the areas, CT470, had a minority population lower than 50 percent of the total population.

3.6.2 Low-Income Populations

For the purposes of this analysis, the density used to identify minority populations (i.e., 50 percent or greater) was also used as a minimum to identify low-income populations. In addition, a local population is judged to be “meaningfully greater” than the general population (i.e., Riverside County as a whole) if the proportion of individuals living under the poverty line is simply greater than that of the general population, providing for a conservative analysis.

For this analysis, proportions of people living in poverty were obtained from the 2009-2013 American Community Survey. The U.S. Census Bureau defines poverty using standards set by the U.S. Office of Management and Budget’s Statistical Policy Directive 14 (U.S. Office of Management and Budget 1978; U.S. Census Bureau 2016). Family income is compared to thresholds that vary according to family size, age, and number of children under 18 years old. If a family’s total income is less than the applicable threshold, then every person in the family is considered to be in poverty. Poverty thresholds are the same for all geographic areas and are adjusted annually by the Consumer Price Index. The U.S. Census Bureau does not define poverty status for institutionalized persons and others living in group quarters.

In 2013, the poverty threshold for a single person under 65 years of age was \$12,119 and for a person 65 years and over was \$11,173. For a four-person family with two children under 18 years of age, the poverty threshold was \$23,624. Other thresholds are defined for different family sizes and compositions (U.S. Census Bureau 2014b).

As shown in Table 3.6-1, the Chuckwalla Valley CCD, in which the Project is located, has 19.2 percent of the population with income below the poverty level. This percentage is higher than Riverside County as a whole (16.9 percent), but lower than that of the Blythe CCD (24.3 percent) and the City of Blythe (23.2 percent). While none of the areas included in the analysis had a poverty rate exceeding 50 percent of the total population, all areas had a greater percentage of the population with income below the poverty level than Riverside County as a whole.

Table 3.6-1. Racial and Income Characteristics for Residents within the Study Area

	Riverside County, CA	CT459	CT461.01	CT461.02	CT461.03	CT462	CT469 (a)	CT470	CT9810 (b)	Blythe City, CA (c)	Blythe CCD, CA (d)	Chuck-walla Valley CCD, CA	La Paz County, AZ	Colorado River Indian Reservation, AZ-CA (e)
Total Population	2,266,899	1,577	3,525	2,205	2,904	3,857	2,684	1,711	6,224	20,101	15,779	9,056	20,348	9,188
Hispanic or Latino (All Races)	46.5%	71.3%	48.1%	69.3%	52.0%	70.1%	46.5%	30.0%	52.3%	53.9%	57.5%	49.8%	24.8%	35.5%
Non-Hispanic														
White	38.3%	27.1%	39.9%	18.4%	39.0%	14.8%	33.5%	60.6%	17.4%	28.1%	31.5%	23.3%	60.9%	32.8%
Black or African American	5.9%	1.5%	10.6%	11.0%	3.0%	14.0%	14.3%	6.0%	22.2%	13.6%	8.7%	19.5%	0.2%	0.5%
American Indian and Alaska Native	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%	2.0%	0.6%	0.0%	1.7%	12.4%	27.7%
Asian	5.9%	0.0%	0.7%	1.0%	6.0%	0.5%	1.5%	2.4%	2.0%	2.1%	1.8%	1.8%	0.7%	1.2%
Native Hawaiian And Other Pacific Islander	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%	0.5%	0.3%	0.1%	0.1%	0.6%	0.2%	0.3%
Some Other Race	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Two or More Races	2.4%	0.0%	0.7%	0.3%	0.1%	0.7%	2.5%	0.4%	3.8%	1.5%	0.4%	3.3%	0.9%	2.0%

Table 3.6-1. Racial and Income Characteristics for Residents within the Study Area

	Riverside County, CA	CT459	CT461.01	CT461.02	CT461.03	CT462	CT469 (a)	CT470	CT9810 (b)	Blythe City, CA (c)	Blythe CCD, CA (d)	Chuck-walla Valley CCD, CA	La Paz County, AZ	Colorado River Indian Reservation, AZ-CA (e)
Percent Minority (Other Than Non-Hispanic White)	61.7%	72.9%	60.1%	81.6%	61.0%	85.2%	66.5%	39.4%	82.6%	71.9%	68.5%	76.7%	39.1%	67.2%
Percent of People Below Poverty Level	16.9%	58.9%	19.8%	38.7%	5.5%	36.9%	20.1%	20.8%	n.a.	23.2%	24.3%	19.2%	18.4%	21.5%

Note:

n.a. – The American Community Survey does not define poverty for institutionalized persons.

(a) Excludes Ironwood and Chuckawalla Valley State Prisons.

(b) Census tract covers Ironwood and Chuckawalla Valley State Prisons only.

(c) Incorporated Blythe City; includes the state prisons.

(d) Excludes the state prisons.

(e) Includes portions of California and Arizona.

Source: U.S. Census Bureau 2014a and 2014b.

3.7 Geology and Soil Resources

The study area relevant to geology, soils, and geologic hazards is the physical footprint that would be associated with Project construction, operation and maintenance, and decommissioning. The study area relevant to faulting and seismic hazards includes the larger Southern California region, because distant faults can produce ground shaking and secondary seismic hazards at the Project area. The information in this section is based on existing maps and reports developed by the U.S. Geological Survey (USGS), California Geological Survey (CGS), U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), and the California Division of Mines and Geology (CDMG). This information was reviewed and summarized by the Applicant in their *Preliminary Geotechnical Investigation Report for the First Solar Development, Inc., Desert Quartzite Solar Project, Riverside County, California*, prepared by URS, 2011.

3.7.1 Local Geology

General Site Geology

A topographic map of the Project area is shown in Figure 2-7. The Palo Verde Mesa is characterized by a nearly level surface flanked by gently to moderately sloping alluvial fans. The geomorphology of the area is controlled by fluvial erosion and deposition.

A geologic map of the surficial geologic units is shown in Figure 3.7-1. Pleistocene and Holocene alluvium and dune sand overlays the older rocks throughout the site. Generalized descriptions of the surficial units encountered are described below.

- The largest portion of the site consists of Pleistocene age alluvial deposits of the ancestral Colorado River (designated Qpv). This unit consists of moderately indurated, poorly graded sand, gravel, boulders, silt, and clay.
- Holocene age alluvium associated with modern washes (designated Qw) has been mapped in the southwestern corner of the site. These deposits are comprised of unconsolidated sand and gravel eroded from nearby mountain ranges.
- Holocene age aeolian sand (designated Qs) has been mapped in the northwestern portion of the site, along the proposed route of the gen-tie line.
- Holocene age alluvial-fan and alluvial-valley deposits (designated Qa6) comprise the western portion of the Project site. This unit is characterized by unconsolidated sand, gravel, silt, and clay.

Soil Resources

The soil types present on the Project site are shown in Figure 3.7-2. The site is generally underlain by Quaternary age alluvium consisting of silty sands and gravels. The predominant soil types mapped by the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) are the Rositas, Orita, Carrizo, and Aco series. These are generally coarse-grained soils, composed of gravel, sand, fine sand, and loam.

All soil types mapped on the site have a low potential for expansive soil characteristics, and for corrosion of concrete. The soils have a high risk for corrosion of uncoated steel. The Rositas-

Orita-Carrizo-Aco map unit is characterized by soils with high sand percentages and moderate susceptibility to wind erosion. Most of the soil types are classified as somewhat limited with respect to suitability for septic systems (USDA 1969).

The Applicant's investigations for Federal jurisdictional waters and wetlands included an assessment of the presence of hydric soils. The investigation found that soil indicators were not found that meet the criteria for hydric soils, as defined by the USACE regulatory guidance, including the 2008 Arid West Supplement (Huffman-Broadway Group 2015).

Figure 3.7-3 shows the Hydrologic Soil Groups present in the Project area. Hydrologic soil grouping is a measure of the infiltration rate of the onsite soils. Soils with a high infiltration rate (Group A) would be expected to have low runoff rates, and therefore would not be prone to erosion by surface water runoff. Soils with a low infiltration rate (Group C) would be expected to have higher runoff rates, and may be prone to erosion by surface water runoff.

Figure 3.7-4 shows the Wind Erodibility Groups present in the Project area, in tons per acre per year. The areas of highest potential wind erodibility (160 to 310 tons per acre per year) correspond to the sand dune areas in the northern and western parts of the Project area. The bulk of the Project area is classified as having moderate wind erodibility potential.

Evaluation of the potential risk of exposure to valley fever, through inhalation of site soils, is presented in Sections 3.9 and 4.9.

Groundwater Conditions

A detailed description of groundwater conditions in the Project area is provided in Section 3.20. Based on the elevation difference between the site and the adjacent Colorado River floodplain, and the depth to groundwater found at adjacent sites, the depth to groundwater at the site is expected to be more than 100 feet.

3.7.2 Geologic Hazards

Faulting and Seismicity

The Project site has not been mapped by the State of California for the purpose of defining Seismic Hazard Zones. There are no known active, sufficiently active, or well-defined fault traces identified on the Project site, and the site has not been delineated by the CGS as being within an Earthquake Fault Zone. Mapping by Jennings (CGS 1994) shows a Tertiary age fault to the southwest of the site, but more recent mapping by the USGS identifies this feature as Quaternary terraces of varying ages, rather than terraces offset by faulting (USGS 2006)

The closest active faults to the Project are the Brawley Seismic Zone, Elmore Ranch, and the San Andreas Fault. All of these active faults are located 58 miles or more west of the Project site (CGS 2010). The closest potentially active fault (defined as a Quaternary-age fault that lacks evidence of Holocene-age displacement) is located approximately 20 miles north of the Project site (CGS 2010).

Surface Fault Rupture

As discussed above, there are no active or potentially active faults mapped within the Project site (CGS 2010). The closest active faults are more than 58 miles away. Therefore, the potential for surface fault rupture within the Project site is low.

Ground Shaking

As discussed above, the Project site is located over 58 miles from the closest active faults in the region. Relative to the more seismically active areas to the west and northwest, the Project site will experience lower levels of shaking less frequently (CGS 2008). The estimated site intensity is a Modified Mercalli Intensity (MMI) value of V, which corresponds to a moderate shaking severity. Such an earthquake would be strong enough to be felt by nearly everyone, and would likely break windows and overturn unstable objects. The peak ground acceleration which has a 10 percent Probability of Exceedance in 50 years is approximately 0.0373g (URS 2011).

Liquefaction

Because of the depth to groundwater of approximately 100 feet, the Project site is unlikely to have saturated soils which could be susceptible to liquefaction.

Soils

Settlement

The geotechnical study of the site did not identify any potential for artificial fill materials at the Project site. However, the site is underlain by alluvial fan deposits of relatively unconsolidated, medium-dense materials. These may be unstable to support structures in the vicinity of the operations and maintenance facility and the On-Site Substation, and could be susceptible to settlement.

Landslides

The potential for landslides, slope instability, or debris flows at the Project site is insignificant, due to the relatively flat terrain.

Subsidence

No subsidence has been reported in the Project area (USGS 2002; DWR 1978). There is no petroleum or natural gas withdrawal which could result in subsidence. The EIS prepared for the Blythe Solar Power Project (BSPP) concluded that no regional subsidence due to the historic groundwater withdrawal has been reported in the vicinity (BLM 2010). This includes localized or regional subsidence during the 1980's and 1990's, when regional groundwater extraction was at its historic maximum of approximately 48,000 AFY in the general area (BLM 2010).

Because the Project site is associated with alluvial fans, the potential for hydrocompaction of collapsible soils could exist.

Expansive Soils

Based on the NRCS maps and descriptions, the soils on the Project site are not expected to have expansive characteristics (USDA 1969). This would be confirmed through additional geotechnical investigation prior to construction.

Corrosive Soils

All soil types mapped on the site have a low potential for corrosion of concrete. However, the soils have a high risk for corrosion of uncoated steel (USDA 1969). This would be confirmed through additional geotechnical investigation prior to construction.

3.8 Greenhouse Gas Emissions and Climate Change

Existing Greenhouse Gas Emissions at the Project Site

No industrial, residential, or other emitters of GHGs are currently located or operating at the Project site. No other existing on-site operations result in the combustion of fossil fuel, or otherwise result in direct anthropogenic emissions of GHGs on-site. There is, however, existing vegetation located on-site, and this vegetation is expected to provide ongoing natural carbon uptake. Wohlfahrt et al. (2008) completed an evaluation of carbon uptake by natural vegetation in Mojave Desert systems. The study indicates that desert plant communities may result in the uptake of carbon in amounts as high as 102 to 110 grams per square meter per year; however, the study showed a high degree of uncertainty around these amounts. This analysis assumes that on-site vegetation could uptake as much as 100 grams per square meter per year as a conservative estimate. Under existing conditions, this would equate to an organic carbon uptake, expressed in CO₂, of approximately 1.48 metric tons (MT) of CO₂ per acre per year.

3.9 Hazards and Hazardous Materials

3.9.1 Hazardous Materials

The hazardous materials associated with Project construction and operation are discussed in Section 2.3.4.9 and 2.3.5, respectively. Procedures to be used for management and disposal of sanitary wastes are discussed in Section 2.3.3.9. Procedures to be used for management and disposal of other wastes are discussed in Section 2.3.7.1. The potential for releases of hazardous materials, and the risks associated with potential releases, are discussed in Section 4.9.3. This section discusses the current conditions on the Project area that are relevant to potential hazardous materials impacts, including the proximity of the Project area to potential receptors, as well as known information regarding current hazardous conditions.

Environmental Site Assessment

Environmental Data Resources, Inc. (EDR) prepared the EDR DataMap™ Area Study, which contains a summary of environmentally affected sites and other sites that are within a one-mile radius surrounding the Project area. The EDR report (included as an appendix to URS 2015) includes descriptions of each agency database, site names and addresses, and status, with some repetition existing among the different databases. There were no hazardous sites identified within the Project site, nor within the one-mile search radius of the Project site.

Existing Environmental Site Contamination

The Phase I Environmental Site Assessment conducted for the Project site in 2015 found two Recognized Environmental Conditions (RECs) per the ASTM definition (URS 2015, provided in Appendix Q). The two RECs were both suspected groundwater supply wells, which were observed to be open and unsecured. There was no evidence of any releases of hazardous substances or petroleum products on the BLM portion of the Project site or in the immediate vicinity based on records searches and visual surveys. De minimis conditions identified on the BLM land during the site reconnaissance included trash and debris. Hazardous substances, in the form of partially-filled oil and lubricant containers and other trash and debris, were observed on the private land parcel. There have been no subsequent response actions, including securing of the groundwater wells or sampling of environmental media on BLM land, to verify whether site contamination currently exists.

The Phase I Environmental Site Assessment conducted for the Project site in 2015 also found one suspected groundwater supply well on the 160-acre private land parcel. The Applicant conducted a limited Phase II Environmental Site Assessment associated with this well in 2015 (also provided in Appendix Q). The scope of the Phase II Environmental Site Assessment included removal of the sheet-metal well cover, measurement of the depth to groundwater, collection of a single grab sample without purging prior to sampling, and analysis of the sample for total petroleum hydrocarbons, volatile organic compounds, polynuclear aromatic hydrocarbons, and metals. The measured depth to groundwater was 138 feet below ground surface. The only analytical parameter detected was molybdenum, which was detected at a concentration below the applicable California Regional Water Quality Control Board Environmental Screening Level. The Phase II Environmental Site Assessment report concluded that there was no evidence to suspect any outside

impacts in the well, and that no further investigation of the well was required. The sheet-metal cover was replaced.

Unexploded Ordnance

During the Phase I Environmental Site Assessment, no indication was found suggesting that bombs or explosive, incendiary, or pyrotechnic materials associated with World War II operations at the former Blythe Army Airfield were present on the Project area. However, because of the former use of public lands in the area for military training, there is potential for discarded military munitions, other explosives, and unexploded ordnance (collectively, UXO) to be encountered on the surface, or in subsurface excavations. The BLM has conducted investigations at several of the known camps, but has not completed a UXO survey of the entire training ground. UXO discoveries have been reported during cultural resource studies in the area, and as part of construction efforts at the Modified BSPP site north of I-10.

Pesticide Use

Based on historical information and existing conditions identified in the Phase I Environmental Site Assessment (URS 2015), the portion of the Project site on BLM land has not been used for agriculture and therefore would not have been subject to pesticide applications.

Based on the historical agricultural use of the private land parcel, there is the potential for residual pesticides to be present in surface and subsurface soils on that part of the Project area.

Sensitive Receptors

The hazards associated with the Project are considered within the context of the proximity of residential and other sensitive receptors, including schools, daycare centers, emergency response facilities, and long-term care facilities. The closest resident is located approximately 0.7 miles north of the Project. Two other residences are located approximately one mile north of the Project, on the southwest corner of the Nichols Warm Springs/Mesa Verde community, which is a community of approximately 300 single family homes and mobile homes. The remainder of the residences in Nichols Warm Springs/Mesa Verde, including the Mesa Verde Park and Roy Wilson Community and Child Center, are located just outside of the 1-mile boundary. No schools, hospitals, or long-term care facilities are located within one mile of the proposed Project (URS 2015).

3.9.2 Public Health

Location of Exposed Populations and Sensitive Receptors

The general population includes sensitive subgroups that could be at greater risk from exposure to hazardous materials or emitted pollutants. These sensitive subgroups include the very young, the elderly, and those with existing illnesses. In addition, the location of the population in the area surrounding a project site may have a major bearing on health risk. The closest resident is located approximately 0.7 miles north of the Project. Two other residences are located approximately one mile north of the Project, on the southwest corner of the Nichols Warm Springs/Mesa Verde community, which is a community of approximately 300 single family homes and mobile homes. The remainder of the residences in Nichols Warm Springs/Mesa Verde, including the Mesa Verde

Park and Roy Wilson Community and Child Center, are located just outside of the 1-mile boundary. No schools, hospitals, or long-term care facilities are located within one mile of the proposed Project (URS 2015).

Existing Public Health Concerns

Analyses of existing public health issues typically are prepared in order to identify the current status of respiratory diseases (including asthma), cancer, and general health in the population located near proposed action sites to provide a basis on which to evaluate any additional health impacts from the proposed action. No data regarding existing health concerns specific to the local area has been identified.

Vector-Borne Diseases

Of four main virus agents of encephalitis in the United States: eastern equine encephalitis, western equine encephalitis, St. Louis encephalitis, and La Cross encephalitis, only the WNV was reported in California in 2015. One hundred and twenty five cases of WNV were reported in Riverside County and 729 cases were reported in the state during 2015 (USGS 2015).

Valley Fever

Riverside County has an average annual incidence rate for valley fever of 2.2 to 3.9 cases per 100,000 people for the years 2007 to 2011 (MacLean 2014), which is relatively low compared to the highest incidence rate for California in Kern County, with an average annual incidence rate of 205.1 cases per 100,000 people for the years 2009 to 2012 (CDPH 2016). The Blythe area was identified as being endemic for valley fever as early as the 1940s (Maclean 2014).

3.9.3 Transmission Line Safety and Nuisance

The potential receptors for hazards associated with transmission line safety and nuisance would be the same as those associated with hazardous materials. The closest resident is located approximately 0.7 miles north of the Project. Two other residences are located approximately one mile north of the Project, on the southwest corner of the Nichols Warm Springs/Mesa Verde community, which is a community of approximately 300 single family homes and mobile homes. The remainder of the residences in Nichols Warm Springs/Mesa Verde, including the Mesa Verde Park and Roy Wilson Community and Child Center, are located just outside of the 1-mile boundary. No schools, hospitals, or long-term care facilities are located within one mile of the proposed Project (URS 2015).

3.9.4 Emergency Response

The Office of Emergency Services maintains two fully functional emergency operations centers in the cities of Riverside and Indio for coordination of response and recovery to extraordinary emergencies and disasters affecting Riverside County. The Riverside County Operational Area Emergency Operations Plan (RCFD 2006) addresses the planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies in or affecting Riverside County and establishes the framework for

coordinating various Riverside County departments and other agencies in their emergency response activities.

The 2010 California Fire Code and 2010 CBC regulate and govern the safeguard of life and property from fire and explosion hazards arising from the storage, handling, and use of hazardous substances, materials, and devices and from conditions hazardous to life or property in the occupancy of buildings and premises. Accordingly, emergency services access roads must be installed and made serviceable prior to and during the time of construction. The grade of the fire department access road must be within the limits established by the Fire Chief and may not exceed 15 percent.

3.9.5 Airport Operations

The Blythe Airport is located approximately 1.5 miles northeast of the proposed solar facility site. The airport is a public facility, owned by Riverside County. The 3,094-acre facility is the largest airport serving eastern Riverside County and serves primarily general aviation demand in the Blythe area. The Airport is classified in the National Plan of Integrated Airport Systems as a general aviation transport airport, designed to accommodate business jets, cargo-type aircraft, light private planes, and flight school training activities. The Blythe Airport currently has two runways (8/26 and 17/35). The primary runway is Runway 8/26, which is oriented generally east-west. Aircraft operations average 69 flights per day (AirNav 2016). The airport is often used as a base for crop spraying operations, flight rental, and flight instruction.

The Project would be partially located within the area covered by the Riverside County Airport Land Use Compatibility Plan (RCALUCP), which was adopted by the Riverside County ALUC and replaced the compatibility plans for individual airports. The RCALUCP identifies Airport Influence Areas (AIAs) to protect the public from the adverse effects of aircraft noise, ensure that facilities and people are not concentrated in areas susceptible to aircraft accidents, and ensure that no structures or activities adversely affect or encroach upon the use of navigable airspace (ALUC 2004).

The Project would be partially located within the Blythe AIA. According to the RCALUCP, electrical facilities (such as power plants, electrical substations, and transmission lines) located in airport land use compatibility zones must meet the restrictions designated for each zone so that they are generally compatible or potentially compatible. This is to ensure that electrical facilities do not create obstructions to the navigable air space and safe operations at the airport. Land uses that create hazards to air navigation are prohibited in all Airport Land Use Compatibility Zones. Such hazards include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Land uses that may increase the attraction of birds to the area are also prohibited. Potential hazards to aviation from solar energy projects located in sufficient proximity to airports include potential electromagnetic interference from the power plant and transmission lines, potential glare from the PV panels used to collect solar energy, and bird attraction from ponds.

The airport land use compatibility zones within the Project area are illustrated in Figure 3.9-1. As shown in Figure 3.9-1, a portion of the Project area would fall within airport Compatibility Zone E (ALUC 2012). The compatibility criteria of projects with Compatibility Zone E are shown in Table 3.9-1. In Zone E, airspace review is required for structures greater than 100 feet in height, but there are no other specific land use restrictions. The provisions of Part 77 of the FAA

Regulations govern whether a proposed project requires the submittal of Form 7460-1 to the FAA for preparation of an aeronautical study. Portions of a transmission line that are not in an AIA still could potentially be subject to FAA review through the Form 7460-1 process if within 20,000 feet (3.8 miles) of a runway, especially if located at a higher elevation than the runway.

Yuma Proving Ground is located approximately 47 miles from the Project site, and is the site of military air navigation activities. Appendix E of the DRECP (BLM 2016) states that “photovoltaic systems on or near SUAs [Special Use Airspace] or MTRs [Military Training Routes] present little to no conflict to military operations, testing, or training.”

Table 3.9-1. Basic Compatibility Criteria with Compatibility Zone E

Zone	Locations	Maximum Densities/Intensities (People per Acre)		Required Open Land	Prohibited Uses	Other Development Conditions
		Average	Single Acre			
E	Other Airport Environs	No Limit	No Limit	No Requirement	Hazards to flight	<ul style="list-style-type: none"> • Airspace review required for objects >100 feet tall • Major spectator-oriented sports stadiums, amphitheaters, concert halls discouraged beneath principal flight tracks

Source: Riverside County Airport Land Use Compatibility Plan Policy Document Table 2A, October 2004.

Notes:

- 1 - Usage intensity calculations shall include all people (e.g., employees, customers/visitors) who may be on the property at a single point in time, whether indoors or outside.
- 2 - The total number of people permitted on a project site at any time, except rare special events, must not exceed the indicated usage intensity times the gross acreage of the site. Rare special events are ones (such as an air show at the airport) for which a facility is not designed and normally not used and for which extra safety precautions can be taken as appropriate.
- 3 - Clustering of nonresidential development is permitted. However, no single acre of a project site shall exceed the indicated number of people per acre.
- 4 - Open land requirements are intended to be applied with respect to an entire zone. This is typically accomplished as part of a community general plan or a specific plan, but may also apply to large (10 acres or more) development projects.
- 5 - The uses listed here are ones that are explicitly prohibited regardless of whether they meet the intensity criteria. In addition to these explicitly prohibited uses, other uses will normally not be permitted in the respective compatibility zones because they do not meet the usage intensity criteria.
- 6 - As part of certain real estate transactions involving residential property within any compatibility zone (that is, anywhere within an airport influence area), information regarding airport proximity and the existence of aircraft overflights must be disclosed. This requirement is set by state law.

3.9.6 Intentionally Destructive Acts

The energy generation sector is one of 14 areas of Critical Infrastructure listed by the U.S. Department of Homeland Security. Nearly all of the other areas of Critical Infrastructure are reliant, at least in part, on the energy sector. The level of security needed for any particular facility depends on the threat imposed, the likelihood of an adversarial attack, the likelihood of success in causing a catastrophic event, and the severity of consequences of that event.

3.9.7 Abandoned Mine Lands

The Applicant’s Phase I Environmental Site Assessment did not identify any abandoned mine lands within one mile of the Project site.

3.10 Lands, Realty, and Agricultural and Forestry Resources

A portion of the Project is located within BLM Utility Corridor J, the Project borders Corridor K, and the entire Project site is located within the Riverside East Solar Energy Zone (SEZ). BLM-administered lands are not zoned, and may be encumbered by easements, rights-of-way (ROWs), mining claims, and permits. Information regarding BLM ROW authorizations and easements were obtained from the Land & Mineral Legacy Rehost 2000 System of automated records (LR2000; BLM 2016). Applicable Federal land use plans include the CDCA Plan (BLM 1980), as amended, and the Northern and Eastern Colorado Desert Coordinated Management Plan (BLM 2002). The CDCA Plan was amended by the Approved Resource Management Plan Amendments/Record of Decision for Solar Energy Development in Six Southwestern States (Western Solar Plan) (BLM and DOE 2012) to identify all SEZ lands within the CDCA as sites associated with power generation or transmission.

Applicable local land use plans for lands around the Project site include the General Plans and Zoning Ordinances/Codes for Riverside County and the Riverside County ALUCP. The Project area is located outside the City of Blythe’s General Plan area. Portions of the Project area are located within Blythe Airport compatibility Zone E. Please see Section 3.9, *Hazards and Hazardous Materials*, for a discussion of compatibility with the ALUCP.

3.10.1 Land Ownership/Management

The land management areas in the region are shown in Figure 3.10-1. The Project site is classified as MUC-M (Moderate Use) in the CDCA Plan, as amended by the NECO Plan. Multiple-Use Class M (Moderate Use) is based upon a controlled balance between higher-intensity use and protection of public lands. This class provides for a wide variety of present and future uses such as mining, livestock grazing, recreation, energy, and utility development. Class M management is also designed to conserve desert resources and to mitigate damage to those resources that permitted uses may cause.

As discussed in Section 1.6.2 and Appendix E, the DRECP replaced Multiple Use Classes with a different system of land use and conservation classifications. However, because the DQSP is not subject to the land use planning decisions made under the DRECP, the requirements of Multiple-Use Class M still apply to the application.

Western Solar Plan

As discussed in Section 1.6, the Project area is located within the Riverside East Solar Energy Zone (SEZ). The Riverside East SEZ was designated through the Final Solar PEIS (also known as the Western Solar Plan) (BLM and DOE 2012). A SEZ is defined by the BLM as “an area well-suited for utility-scale production of solar energy within which the BLM will prioritize and facilitate utility-scale production of solar energy and associated transmission infrastructure development”. The Western Solar Plan and ROD recognize the DQSP as a “pending” ROW application (Western Solar Plan §9.4.22.2, p. 9.4-133). Pending applications like the DQSP are not subject to the land use planning decisions in the Western Solar Plan ROD (Western Solar Plan ROD Section B.1.2) or to the CDCA Plan amendments made in that decision.

Desert Renewable Energy Conservation Plan

In the DRECP, the Project site is designated as a Development Focus Area (DFA), which is an area where activities associated with solar, wind, and geothermal energy are allowed, streamlined, and incentivized. The DRECP also designates the Project area as VRM Class IV.

Because the application is not subject to the land use planning decisions in the DRECP, the Project is evaluated within the context of the multiple-use class designations of the CDCA Plan, as amended by the NECO Plan. The Project site is classified as Multiple Use Class M (Moderate Use) in the CDCA Plan, as amended by the NECO Plan.

Donated Lands

The BLM can be the recipient and trustee of land donated by individuals or groups. Often such lands are donated with the express interest of preserving the resources that characterize these lands. In so doing, a restrictive instrument such as a conservation easement or deed restriction is attached to the donation and land that would control its use, often in terms of prohibiting development or change to the landscape. There is no record of such a donation and accompanying restrictive instrument associated with the Project site.

Riverside County

The 160 acre privately-owned inholding within the Project site is under Riverside County jurisdiction, and land uses are governed by Riverside County plans and policies.

3.10.2 Existing Uses

On-Site Land Uses

The current BLM easements and rights-of-way on and adjacent to the Project site are listed in Table 3.10-1. The Project site is situated just outside of the intersection of two designated utility corridors, so it bounded on its northern, southwestern, and southeastern sides by linear ROWs, including transmission line, pipelines, communications lines, and roads. On December 16, 2014, the BLM sent letters to the existing ROW holders notifying them of the Project.

Table 3.10-1. Existing Easements and ROWs On and Adjacent to Project Site

Owner	Location Relative to the Preferred Project Site	Use(s)	Width (feet)	BLM Serial File Number
Western Area Power Administration	Adjacent to southeastern border of Project site.	Access Road	50 ft	CAAZLA 77757
Imperial Irrigation District	Adjacent to southeastern border of Project site.	Nyland Blythe transmission line	50 ft	CACA-008974
Southern California Edison	Adjacent to southwestern border of Project site.	Devers-Palo Verde 1 transmission line	100 ft	CA 04163
Southern California Edison	Adjacent to southwestern border of Project site.	Devers-Palo Verde 2 transmission line	130 ft	CA 17905
Imperial Irrigation District	Within CRSS	Desert Southwest transmission line	NA	CA 044491
Southern California Edison	Within CRSS	Transmission line	NA	CA 053059

Table 3.10-1. Existing Easements and ROWs On and Adjacent to Project Site

Owner	Location Relative to the Preferred Project Site	Use(s)	Width (feet)	BLM Serial File Number
SCE	Within CRSS	Transmission line	20	CA 020241
Frontier Communications of the Southwest	Adjacent to southeastern border of Project site.	Underground telephone line	10 ft	CA 21597
FPL Energy Cabazon Wind, LLC	Adjacent to southwestern border of Project site.	Transmission line	95 ft	CA 46331
North Baja Pipeline, LLC	Adjacent to southeastern border of Project site.	30 inch oil and gas pipeline	NA	CA 42662
Palo Verde Irrigation District	Blanket easement throughout T 7S, R 21E, which overlaps the Project site.	Build, construct, and maintain telephone line and irrigation ditches	NA	CA 106688

Source: BLM LR2000

The portion of the Project area located on BLM land is currently undeveloped. The private parcel is currently zoned Controlled Development Areas (W-2-10) (10-acre minimum) (Riverside County 2015b).

Prime Farmland, Unique Farmland, or Farmland of Statewide Importance are not present in the Project area. Williamson Act contracts are also not present (California Department of Conservation 2012; 2014). No forestlands, timberlands, or timberland zoned Timberland Production occur within the Project area.

Surrounding Land Uses

The land adjacent to the Project area includes the 200 acre, 21 MW, NRG-owned solar project which shares a boundary approximately 0.75 miles long on the northeast side of the Project area. The recently-approved 485 MW, 3,660 acre Blythe Mesa Solar Project (BMSP) is also adjacent to the Project on its eastern side.

The existing Devers-Palo Verde Transmission Line Number 1 (DPV1) and DPV2 form the southwestern boundary of the Project site, and an additional transmission line, the Ten West Link, is proposed in that same location. The 7.5 MW, 200 acre NRG Blythe PV Solar Power Plant is located adjacent to the northern boundary of the Project site. A portion of the 485 MW, 3,660 acre BMSP, approved by the County in 2014 and by the BLM in 2015, is located on a parcel of land which is surrounded on three sides, the north, west, and south, by the Project site.

Two gen-tie lines are already authorized by BLM within the Corridor K/30-52, which runs roughly in parallel with the alignment of 16th Avenue/Seeley Avenue along the southern edge of Sections 3 and 4, T 7S, R 21E, San Bernardino Base and Meridian. The ROW for the gen-tie line for the BMSP was approved by BLM in August, 2015 (CACA-05313), but has not yet been constructed. A portion of this ROW crosses the northern portion of the DQSP filing area. The gen-tie line for the MSEP is co-located with that for the BSPP. These gen-tie lines share a single set of poles.

Other land uses in the area include the unincorporated community of Mesa Verde/Nicholls Warm Springs, Blythe Airport, Blythe Energy Center, Blythe Substation, CRSS, ancillary agricultural facilities, and dirt roads.

The residential development known as Nicholls Warm Springs/Mesa Verde is located approximately 4,800 feet north of the northeast corner of the Project site boundary. This community is mainly composed of single-family dwellings and mobile homes. A small number of dispersed farm and rural residences are located near the solar facility, mostly located to the north and east. The nearest residence is located approximately 3700 feet north of the proposed solar facility.

The Blythe Airport is located 1.5 miles northeast of the Project site. Commercial uses are located at the highway interchange south of the Airport, on the north side of I-10. The 3,904-acre airport is the largest in eastern Riverside County and serves general aviation demand in the Blythe area. The airport is classified as a general aviation transport airport, designed to accommodate business jets, cargo type aircraft, light private planes, and flight school training activities (Riverside County 2015b). The Blythe Airport currently has two runways (8/26 and 17/35). The primary runway is Runway 8/26, which is oriented generally east-west. The airport is a public facility, owned by Riverside County and leased by the City of Blythe. The airport is often used as a base for crop spraying operations, flight rental, and flight instruction (Riverside County Airport Land Use Commission 2004; Riverside County 2015b). Aircraft operations average 69 per day (AirNav.com 2015). The Blythe Airport has been designated as a County redevelopment area with the intent to encourage expansion of airport facilities and commercial and industrial development at the airport (Riverside County Redevelopment Agency 1988).

The area is also served by a spur line of the Arizona and California Railroad, I-10, and two state highways. State Highway 95 runs north from Blythe to Needles and Las Vegas. State Highway 78 traverses the desert southwest from Blythe to the Imperial Valley.

Table 3.10-2 summarizes the existing land uses and general and area plan land use designations for the Project and surrounding area.

Table 3.10-2. Surrounding Land Uses and Designations

Direction from Project Site	Existing Land Use	Existing Land Use Designation
North	Open Space	Agriculture
		Medium Density Residential
		Open Space Rural
East	Open Space	Agriculture
		Rural Residential
South	Open Space	Open Space Rural
West	Open Space	Open Space Rural

Source: Riverside County 2015b.

Utility Corridors

The CDCA Plan identifies “planning” and “contingency” utility corridors on BLM-administered land. One of the broad goals of the BLM system of utility corridors is to implement the network of joint-use planning corridors to meet projected utility needs. The CDCA Plan designates utility corridors for “multi-modal use,” allowing the following types of facilities:

- New electrical gen-tie towers and cables of 161 kV or above;
- all pipelines with diameters greater than 12 inches;

- coaxial cables for interstate communications; and
- major aqueducts or canals for interbasin transfers of water.

Numerous authorized and proposed BLM ROWs are located adjacent to the Project site. The relationship of the Project site to designated utility corridors is shown in Figure 3.10-2. The Project site partially overlies two CDCA-designated corridors. Corridor J, a 2-mile-wide, north-south corridor is on the eastern edge of the Project site, and Corridor K, a 2- to 4-mile-wide, east-west corridor is parallel to the northern boundary of the Project site. Additionally, Section 368 of the EPAct (Public Law 109-58) requires the DOI to examine and designate energy transportation corridors in the West. In response, the BLM issued the “*Approved Resource Management Plan Amendments/Record of Decision (ROD) for Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States*” (January, 2009) which designated Section 368 Corridors in the western United States. Section 368 corridors are identified with a numeric designation and are often overlain on locally designated corridors. In the Project area, the 2-mile wide, east-west Section 368 Corridor 30-52 overlies Corridor K.

Two gen-tie lines are already authorized by BLM and installed within the Corridor K/30-52, which runs roughly in parallel with the alignment of 16th Avenue/Seeley Avenue along the southern edge of Sections 3 and 4, T 7S, R 21E. The ROW for the gen-tie line for the BMSP was approved by BLM in August, 2015 (CACA-05313). This ROW crosses the northern portion of the DQSP filing area. The gen-tie line for the MSEP is co-located with that for the BMSP, occupying the same set of poles.

In addition to the two CDCA-designated corridors on the northern and eastern boundaries of the Project area, the southwestern boundary of the Project area is also paralleled by transmission lines, including the existing DPV1 and DPV2 lines, and the proposed Ten West Link.

3.11 Mineral Resources

Review of available BLM records has determined there are no active mining claims, mineral leases or disposals of mineral materials within the Project Area. There is no record of any previous or current BLM authorization for mineral production within the project area.

The State Mining and Geology Board (SMGB) have established Mineral Resource Zones (MRZs) to designate lands that contain mineral deposits, and the state has also designated Aggregate Mineral Resource areas. The Project site is designated as MRZ-4, an area where there is not enough information available to determine the presence or absence of mineral deposits. The state also designates Aggregate Mineral Resource areas within Riverside County. These designated areas are in the southwestern part of the County, and are not found on or near the Project site (Riverside County 2015a).

The Palo Verde Area Plan does not designate any areas within its boundaries for Open Space – Mineral Resources (Riverside County 2015b).

The Project area is underlain by sand and gravel, which could potentially represent a source of saleable minerals or mineral materials if local demand for construction aggregate is sufficient. Sand and gravel deposits are ubiquitous throughout the Quaternary geologic deposits in the vicinity of the Project area and the region.

The Mineral Resources Data System (MRDS), administered by the USGS, provides data to describe metallic and nonmetallic mineral resources, including deposit name, location, commodity, deposit description, production status and references. According to review of the MRDS online database, metallic resources and occurrences (such as gold, silver, manganese, and copper) are located in the Mule Mountains to the southwest, but metallic resources are not located in the Project area (USGS 2016).

A review of the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, indicates that oil, gas, or geothermal resources are not present within or in the vicinity of the Project area (DOGGR 2016). The State Division of Oil and Gas does not report any significant or active oil or gas production in the County (Riverside County 2015a).

The use of the site for rockhounding is addressed in Section 3.14.

3.12 Noise

The Project setting and ambient noise conditions were provided in the Applicant's Noise Technical Report (URS 2015, provided in Appendix R). The Project site is located in the Colorado Desert in eastern Riverside County. Most of the surrounding land is covered by desert scrub. The site is approximately 2.75 southwest of the City of Blythe and just south of I-10. The land use of the Project site is undeveloped open space, and the surrounding land uses include undeveloped open space and agriculture.

Sensitive Receptors

In general, residences, schools, hotels, hospitals, and nursing homes are considered to be the most sensitive to noise. Places such as churches, libraries, and cemeteries are also sensitive to noise. Commercial and industrial uses are considered the least noise-sensitive.

The nearest noise sensitive receptors are shown illustrated in Figure 3.12-1, along with the 11 locations where ambient noise levels were measured. There are no residences within 0.5-mile of the Project area. The nearest noise sensitive receptor (NNSR) is located approximately 4,800 feet north of the northeastern Project boundary (where it coincides with 16th Avenue/Seeley Avenue) in between the Project site and the community of Nicholls Warm Springs/Mesa Verde. The receptor appeared to be an occupied mobile home/trailer at the time of the field reconnaissance in August 2014. The next two closest potentially affected sensitive receptors are located approximately 4,800 feet (ST03 and ST05) from the Project site's northeast boundary, respectively. These two locations are representative of the homes in the community of Nicholls Warm Springs/Mesa Verde closest to the northeastern site boundary. No schools, hospitals, libraries, or convalescent homes are located within one mile of the proposed Project.

Existing Ambient Noise Conditions

The primary noise sources in the proposed Project area are traffic from I-10 and nearby roadways; airplane noise from the Blythe Airport; sounds from the agricultural operations; sounds emanating from neighborhoods (e.g., voices, radio and television broadcasts); and naturally occurring sounds (e.g., winds, wind-generated noises).

I-10 is a major transportation artery and the primary noise source in the area. Noise measurements within 300 feet of I-10 range from 65 dBA to levels exceeding 82 dBA caused by the passage of heavy trucks. During peak use periods, traffic noise levels can range from 80 to 90 dBA at 50 feet from the shoulder of the interstate. State Route 78 experiences lower traffic volumes and vehicle speeds and therefore likely has somewhat lower associated noise levels. Agricultural activities are conducted on land near the proposed Project boundary. Noise associated with farming activities includes that generated by heavy equipment used for cultivation and harvesting. Maximum noise levels associated with farm equipment typically range from 75 to 85 dBA at a distance of 50 feet. Noise impact contours for the Blythe Airport range from 65 CNEL, 60 CNEL, to 55 CNEL. The most stringent noise contour boundary (55 CNEL) is approximately 1,000 feet from the runways (RCALUCP 2004).

In August, 2014, the Applicant measured existing outdoor ambient sound levels at a set of 11 representative receiver locations for 20 minutes at each location. The dominant noise source at and

around the vicinity of the site is vehicular traffic from local roadways and I-10. Noise levels ranged from 39 to 63 dBA (Table 3.12-1). Locations within Blythe (ST07 and 08), closer to I-10 (ST04, 06, 10) and along 16th Avenue/Seeley Avenue (ST09) generally had higher ambient noise levels than sites within or south of Nicolls Warm Springs/Mesa Verde and closer to the Project area (ST03, 05, 11).

Table 3.12-1. Short-Term Sound Level Measurement Results¹

Measurement Location ²	Date (m/dd/yyyy)	Start Time (hh:mm)	Stop Time (hh:mm)	Duration (Minutes)	Leq (dBA)
ST01	8/19/2014	18:20	18:40	20	44
	8/19/2014	23:17	23:37	20	41
ST02	8/19/2014	18:47	19:07	20	45
	8/19/2014	23:43	00:03	20	46
	8/20/2014	11:59	12:19	20	45
ST03	8/19/2014	22:46	23:06	20	39
	8/20/2014	10:59	11:19	20	39
ST04	8/20/2014	11:29	11:49	20	52
ST05	8/20/2014	12:29	12:49	20	40
ST06	8/20/2014	12:58	13:18	20	63
ST07	8/20/2014	14:33	14:53	20	54
ST08	8/20/2014	15:04	15:24	20	59
ST09	8/20/2014	15:34	15:54	20	51
ST10	8/20/2014	16:10	16:30	20	57
ST11	8/20/2014	17:46	18:06	20	41

Notes

1 Source: Ambient noise field measurements by URS personnel in August 2014.

2 Refer to Figure 3.12-1 for measurement locations.

3.13 Paleontological Resources

The site-specific review of the potential for paleontological resources consisted of a literature review, records search, and field survey

Literature Review

The inventory and assessment included review of surficial geologic maps of the Project area by Stone (2006) and Hayhurst and Bedrossian (2010), supplemented by previous research in the local area by Reynolds (Reynolds 2004; Reynolds et al. 2008), and information from the field surveys at the proposed Rio Mesa Solar Project site, located 6 miles southeast of the DQSP (Stewart 2012; Stewart et al. 2012). Information from the literature review was compared to Google Earth aerial imagery covering the Project site. Paleontological and geologic literature associated with the geologic units in the Project area was reviewed to determine the potential for the occurrence of paleontological resources on the Project site. Archival searches were conducted by the Natural History Museum of Los Angeles County Department of Vertebrate Paleontology (LACM), and the San Bernardino County Museum (SBCM), to identify additional information on fossil localities, and to document the occurrence of any other previously recorded but unpublished fossil locality from stratigraphic units in or near the Project site. The results of the data searches were used to compile a paleontological resource inventory of the Project area by stratigraphic unit and to assess the paleontological productivity of each unit using the BLM PFYC system.

Records Search Results

The review of museum collection records at the LACM and SBCM did not identify any vertebrate fossil localities in the Project area. Vertebrate fossil localities were reported within similar alluvial deposits in the region, but not within close proximity to the Project site. The assessment determined that shallow excavations in the younger Quaternary Aeolian and alluvial fan sediments were unlikely to encounter significant vertebrate fossil remains. Excavations within the older Quaternary deposits could uncover significant vertebrate fossils. Therefore, both the LACM and SBCM reports recommended monitoring and mitigation during any excavation activities.

Field Survey

The paleontological field survey was conducted from May 14 to June 1, 2018, and the results were reported in the Paleontological Survey of the Desert Quartzite Solar Project in September, 2018 (El Adli 2018). The survey included the entire Project area, as well as a 200 foot buffer surrounding the Project area. No specimens were collected during the field survey, as was outlined in the BLM Fieldwork Authorization. Therefore, a separate field program will be necessary to collect any significant fossil remains found within the Project area during the field survey prior to any earthmoving activities.

In total, 39 fossil localities were discovered within the project area (37 on public lands and 2 on private lands). Fossils discovered from these sites represent at least five taxa, including tortoise, jackrabbit, horse, mammoth, and seed plant. Thirty-two fossil localities produced vertebrate remains, whereas 7 included petrified-wood fossils. Fossil tortoise remains were found nearly exclusively in the old terrace deposits, whereas petrified-wood fossils were more abundant in the stabilized alluvial deposits.

In addition to the identification of specific fossil localities, the survey included detailed mapping of geologic units and soil types. Table 3.13-1 presents the potential fossil yield classifications (PFYCs) and Society of Vertebrate Paleontologists (SVP) rankings of the geologic units present at the Project site. The distribution of the PFYCs and SVP ranks on the site is shown in Figure 3.13-1.

Table 3.13-1. PFYCs and SVP Ranks at the Project Site

Stratigraphic Unit	PFYC	SVP Rank	Description and Basis (BLM IM 2008-009; see Appendix C of Reynolds and Lander 2016)
Old terrace deposits (Qot) (middle to late Pleistocene) (unit Qpv in Figure 3.7-1)	4	high	<ul style="list-style-type: none"> • Highly fossiliferous geologic units that regularly and predictably produce vertebrate fossils, and that are at risk of human-caused adverse impacts or natural degradation. • Vertebrate fossils are known and documented to occur consistently, predictably, at one locality/five acres. • Unit is exposed. Paleontological resources are highly susceptible to adverse impacts from surface-disturbing actions.
Stabilized Alluvial Fan Deposits (Qf2) (late Pleistocene to Holocene) (unit Qa6 in Figure 3.7-1)	3	high	<ul style="list-style-type: none"> • Unit interfingers with old terrace deposits (unit Qot) and, therefore, might contain a similar fossil vertebrate fauna.
Active Alluvial Fan Deposits (Qf1) (late Holocene) (unit Qa6 in Figure 3.7-1)	2	low	<ul style="list-style-type: none"> • Sedimentary geologic units that are not likely to contain vertebrate fossils. • Units younger than 10,000 years before present.
Stabilized Aeolian and Dune Deposits (Qe) (late Pleistocene) (unit Qs in Figure 3.7-1)	3	high	<ul style="list-style-type: none"> • Unit exhibits geologic (stratigraphic) features and preservational conditions that suggest significant fossils could be present.
Active Aeolian and Dune Deposits (Qe) (late Holocene) (unit Qs in Figure 3.7-1)	2	low	<ul style="list-style-type: none"> • Sedimentary geologic units not likely to contain vertebrate fossils or scientifically significant nonvertebrate fossils. • Units younger than 10,000 years before present. • Recent aeolian deposits.
Active Alluvial Wash Deposits (Qw) (late Holocene) (unit Qw in Figure 3.7-1)	2	low	<ul style="list-style-type: none"> • Sedimentary geologic units that are not likely to contain vertebrate fossils. • Units younger than 10,000 years before present.

3.14 Recreation and Public Access

3.14.1 Recreation Resources on the Project Site

The types of recreational uses that may occur at the site are governed by the CDCA Plan (BLM 1980); and the NECO Plan Amendment to the CDCA Plan (BLM 2002). The site is designated in the CDCA Plan for Multiple-use Class M, or Moderate Use (BLM 1980). Class M lands are suitable for a wide range of recreation activities which may involve moderate to high user densities, including backpacking, primitive unimproved site camping, hiking, horseback riding, rockhounding, nature study and observation, photography and painting, rock climbing, spelunking, hunting, landsailing on dry lakes, noncompetitive vehicle touring, mountain and trail biking, and competitive motorized-vehicle events only on “existing” routes of travel (BLM 1980; BLM 2002). Stopping, parking, and vehicle camping are allowed to occur within 300 feet of a route, except within sensitive areas such as Areas of Critical Environmental Concern (ACECs), where the limit is 100 feet (BLM 2002). Trails are open for non-vehicular use and new trails for non-motorized access may be allowed (BLM 1980). Recreational vehicle use, including OHV use, is discussed below in Sections 3.14.1.2 and 3.14.1.3. There are no recreation facilities, developments, or specific recreational attractions on the site. There are no specifically known resources or deposits that attract rockhounding onsite. Visitor numbers are expected to be low within the Project area, due to the availability and accessibility of recreation opportunities in the surrounding area.

3.14.2 Recreation Resources In the Vicinity of the Project Site

The Palo Verde Valley offers multiple outdoor recreational opportunities for boating, water skiing, jet skiing, swimming, fishing, canoeing, camping, rock hounding, hiking, mountain and trail biking, archery, hunting, horseback riding, trapping, trap and skeet shooting, and OHV use.

BLM-Administered Recreation Resources

The CDCA Plan, the NECO Plan Amendment to the CDCA Plan, and the DRECP govern the types of recreational uses on BLM lands within the Project area. The BLM-managed lands within the Project area are designated as a Development Focus Area (DFA) in the DRECP. Vehicle access would be allowed on designated routes unless it is determined that use must be further limited, which would require an amendment to the NECO Travel and Transportation Management Plan (TTMP). Other lands in the vicinity of the Project area are designated as Wilderness, ACECs, and California Desert National Conservation Lands (CDNCLs). These lands are suitable for recreation activities that generally involve low to moderate user densities. Specific allowable activities depend on the designation, as well as area-specific management prescriptions, but may include, backpacking, primitive unimproved site camping, hiking, horseback riding, rockhounding, nature study and observation, photography and painting, rock climbing, spelunking, hunting, landsailing on dry lakes, noncompetitive vehicle touring, mountain and trail biking, and events only on “approved” routes of travel (BLM 1980 and 2002).

The BLM administers wilderness areas, Long Term Visitor Areas (LTVAs), ACECs, and other recreational opportunities in the vicinity of the Project, which are listed in Table 3.14-1 and illustrated in Figure 3.14-1. ACECs and wilderness also provide dispersed recreation opportunities in the region. Overall, recreation use on BLM lands in the vicinity of the Project is limited to the

cooler months of September through May, with little or no use in the summer. Popular recreation activities include car and recreational vehicle (RV) camping, OHV riding and touring, hiking, photography, hunting (dove, quail, deer), sightseeing, and visiting cultural sites. Local residents and long-term winter visitors make up the majority of the use. For detailed information on the ACECs and wilderness areas, please see Section 3.16, *Special Designations and Lands with Wilderness Characteristics*.

Table 3.14-1. BLM-Administered Recreational Areas and Opportunities in the Project Vicinity

Recreational Area	Distance from Project (miles)
ACEC	
Mule Mountains	1.0
Chuckwalla	13.1
Chuckwalla Valley Dune Thicket	7.2
Big Marias	14.4
Palen Dry Lake	19.6
Mule McCoy Linkage	2.0
McCoy Wash	6.0
McCoy Valley	7.5
Upper McCoy	12.5
Chuckwalla to Chemehuevi Tortoise Linkage	15.0
Palen Ford Playa Dunes	7.0
Picacho	15.0
Wilderness Areas	
Palen/McCoy	18.5
Big Maria Mountains	12.5
Little Chuckwalla Mountains	11.4
Chuckwalla Mountains	19.0
Palo Verde Mountains	10.5
Rice Valley	19.1
Trigo Mountain	19.4
Long Term Visitor Area (LTVA)	
Midland LTVA	11.4
Mule Mountains LTVA	8.3
Campground	
Wiley's Well Campground	8.0
Coon Hollow Campground	10.7
Trail	
Bradshaw Trail	4.2

Source: Compiled by AECOM in 2015.

Wilderness Areas

Seven wilderness areas are located in the vicinity of the Project: the Palen-McCoy Wilderness, Big Maria Mountains Wilderness, Little Chuckwalla Mountains Wilderness, Chuckwalla Mountains

Wilderness, Palo Verde Mountains Wilderness, Rice Valley Wilderness, and Trigo Mountain Wilderness.

These wilderness areas in the vicinity of the Project have no developed trails, parking/trailheads, or other visitor use facilities (BLM 2014a-g). These areas are generally steep, rugged mountains, with no permanent natural water sources, thus limiting extensive hiking or backpacking opportunities. BLM does not collect visitor use counts in these areas, but BLM staff estimated, in 2011, that there are approximately 100 to 200 hikers per year within each of the wilderness areas. More popular is vehicle camping along roads that are adjacent to the wilderness areas. RV camping near wilderness areas, with associated hiking, OHV use, photography, sightseeing, etc. accounts for up to 2,000 visitors per year (BLM 2011, as cited in BLM 2012b).

Long Term Visitor Areas (LTVAs)

Two LTVAs are located in the vicinity of the Project area: Midland LTVA and Mule Mountains LTVA. Both provide long-term camping opportunities. In addition to long-term camping, recreational opportunities at LTVAs include hiking; OHV use; rockhounding; viewing cultural sites, wildlife, and unique desert scenery; and solitude. The landing or take-off of aircraft, including ultra-lights and hot air balloons, is prohibited in LTVAs (BLM 2015b).

Two campgrounds are located within the boundaries of the Mule Mountains LTVA: Wiley's Well and Coon Hollow Campgrounds. Both are year-round facilities with campsites, picnic tables, grills, shade armadas, and handicapped-accessible vault toilets (BLM 2015c; BLM 2015d). In fiscal year 2015, the Midland LTVA received 16,545 individual visits, totaling 24,818 visitor days. The Mule Mountain LTVA received 16,752 individual visits, totaling 25,896 visitor days (BLM 2016).

Under DRECP, LTVAs and campgrounds are classified as Level 1 recreation facilities.

Areas of Critical Environmental Concern

Twelve ACECs are within 20 miles of the Project area. Of these, five (Mule Mountains, Chuckwalla Valley Dune Thicket, Chuckwalla, Big Marias, and Palen Dry Lake) existed at the time the DQSP application was submitted, and seven more (Mule McCoy Linkage, McCoy Wash, McCoy Valley, Upper McCoy, Chuckwalla to Chemehuevi Tortoise Linkage, Palen Ford Playa Dunes, and Picacho) were designated in 2016 as part of DRECP. Recreation activities allowed in ACECs are determined by the resources and values for which the ACECs were established, and by the associated ACEC Management Plan. Most ACECs allow low-intensity recreation use that is compatible with protection of the relevant values.

The closest ACEC to the Project is the Mule Mountains ACEC, located approximately one mile south of the Project. The Mule Mountains ACEC primarily protects cultural resources. Other ACECs in the region protect cultural resources, wildlife, vegetation, or a combination of these resources. Most of these ACECs do not have recreation use facilities, but have signage to inform visitors of the special values of the areas and associated protection measures. Under DRECP, these areas are classified as Level 3 recreation facilities.

The Bradshaw Trail

The BLM-administered portion of the Bradshaw Trail is a 70-mile Back Country Byway that begins about 35 miles southeast of Indio, California and ends about 14 miles southwest of Blythe (BLM 2010; BLM 2012e). The Riverside County PVVAP Trails and Bikeway map shows a route for the Bradshaw Trail that continues east of this location through Blythe to the Colorado River (Riverside County 2010). The trail was the first road through Riverside County, created by William Bradshaw in 1862 as an overland stage route beginning in San Bernardino, California, and ending at Ehrenberg, Arizona. The trail was used extensively between 1862 and 1877 to transport miners and passengers. The trail is a graded dirt road that traverses mostly public land between the Chuckwalla Mountains and the Chocolate Mountain Aerial Gunnery Range.

Regional Recreation Resources

The Riverside County Regional Park and Open-Space District also provides several recreational facilities in the Project vicinity. A regional trail is proposed by the County along an existing railroad line (Riverside County 2010). The Regional Park and Open-Space District also owns Mayflower Park, Riviera Marina Park, and McIntyre Park, which all provide long- and short-stay RV and tent camping, showers, picnicking, fishing, and boat launching (Riverside County Regional Park and Open-Space District 2015a and b, Desert USA.com 2015). Riverside County Regional Park and Open-Space District also owns and operates the Goose Flats Wildlife Area, which provides boating and fishing opportunities (Desert USA.com 2015). The aforementioned facilities are illustrated in Figure 3.14-2.

There is also one regional park in Imperial County, Palo Verde Park, which is located just south of the town of Palo Verde on the Colorado River adjacent to the Cibola National Wildlife Refuge (Desert USA.com 2015; Imperial County 2016).

Other Recreational Areas and Opportunities

The City of Blythe provides year-round sporting activities. The Blythe Parks Department oversees eight parks (approximately 74 acres total), including five neighborhood parks, two community parks, and one regional park (See California.com 2015). The “Big Foot Skate-board Park” is located at Todd Park (See California.com 2015), which is approximately 8 miles from the Project area. Other nearby City of Blythe parks include Appleby Park and Miller Park, (See California.com 2015). The Blythe Municipal Golf Course is approximately eight miles from the Project area. The Mesa Verde Park, located just south of the Nicholls Warm Springs/Mesa Verde residential area, is approximately 0.4 mile (2,200 feet) from the proposed solar facility. Other recreational opportunities in Blythe include soccer, football, track and volleyball leagues; indoor racquetball; basketball; aerobic activities; weight room; and summer swimming (See California.com 2015). Various nearby privately-owned RV parks and campgrounds also provide recreational facilities, including a boat dock, launch ramp, fishing, swimming, horseshoe pits, wildlife observation, and other active and passive recreation opportunities. The aforementioned facilities are illustrated in Figure 3.14-2.

The Cibola National Wildlife Refuge, administered by the USFWS, can be reached from the California side of the Colorado River, just south of Blythe, or, from the Arizona side, south of Quartzsite. This refuge was established in 1964 as mitigation for dam construction on the Colorado River, and provides important habitat for migratory birds, wintering waterfowl, and resident

species. Recreational opportunities include hunting, fishing, wildlife viewing, and a nature trail (USFWS 2014). The refuge is approximately 12 miles from the Project area.

Agricultural areas, including those near the Project area (including the 160-acre inholding within the Project area), may be used for recreational activities; however, these activities are not assumed to occur with high frequency.

3.14.3 Public Access

In their Assessment of NECO Coordinated Management Plan (CMP) Designated Open Routes (URS 2015, provided in Appendix L), the Applicant has identified several BLM designated Open routes within the Project area. These routes of travel are shown in Figure 3.14-3. Routes within the Project area boundary include three routes that provide access to the 160-acre private inholding within the Project boundary (660862, 660866, and 661501). Because these routes are spur routes, BLM determined that they would be classified as Tier 3 routes under the route definitions specified in DRECP. There are also three routes that provide access to the Mule Mountains (660863, 661092, and 661102). Because these routes are through routes, BLM determined that they would be classified as Tier 2 routes under the route definitions specified in DRECP. On the perimeter of the Project area, there is a maintained dirt route along the powerline on the southeastern Project boundary (660868) and the southwestern Project boundary (660703).

The BLM has no traffic counters or other means to accurately determine use of routes in the immediate Project area. Traffic counters and visitor use data are available in the region, including for the Bradshaw Trail (located 4.2 miles away), and for the Red Cloud Road access to the Wiley Well LTVA and Hauser Geode Beds.

3.15 Social and Economic Setting

The Project site is located in eastern Riverside County, approximately 10 miles west of the City of Blythe. The site and its immediately adjoining areas are vacant, with no existing population or housing. Areas of potential social and economic effects include Riverside County and the City of Blythe, as well as small nearby communities, in California. In Arizona, the areas of potential social and economic effects include La Paz County and the relatively small communities of Ehrenberg and Quartzite.

The Project includes the construction, operation, maintenance, and decommissioning of a solar energy generating facility. The expected source area for the Project's construction workforce is the primary determinant of the affected social and economic environment associated with the Project. The direct benefits of employment and higher personal incomes will primarily benefit the communities where workers and their families reside, since that would likely be where they spend the majority of their earnings. Workers' spending for goods and services also would have an indirect impact on the communities and economies where that spending occurs.

If there is an insufficient number of suitable workers to staff the Project locally or in the region, then the Project could attract individuals to relocate to the area (either temporarily or permanently), which consequently could result in increased demand for housing and local services. That increased demand could result in decreased availability, or increased prices, for other area residents.

There is little available research and analysis providing guidance for determining the socioeconomic impact area boundaries for power facilities. The widely referenced Electric Power Research Institute (EPRI) analysis (EPRI 1982) is generally cited as showing that workers may commute as much as two hours each direction from their communities rather than relocate. However, the study reports 1.42 hours as the average "construction workers maximum daily commuting time" observed in 12 case studies, and acknowledges a prevalence of weekly commuting for power projects. Large scale utility solar facilities have been constructed in the area in recent years, and anecdotal information from City of Blythe representatives, alternative energy company representatives, and area business leaders have suggested weekly commuting is relatively common among the majority of construction personnel, although some construction personnel stay in the area for multi-week stints if their construction role is of a relatively short duration (e.g., 2-3 weeks). Housing used by weekly or multi-week commuters typically includes hotel rooms near the Project site, recreational vehicle (RV) parks, and/or campgrounds. Construction management and other personnel who are employed in at the site for the entirety (or large majority) of the construction duration may choose to relocate their families and buy/rent more permanent housing (as opposed to staying at a hotel or an RV park).

For purposes of socioeconomic analysis, and as a conservative assumption recognizing the rural nature of eastern Riverside County, a 2-hour travel radius is used to define the outer limits of the study area. It is likely that most construction workers would come from western Riverside County, which has the largest concentration of construction workers close to the Project site (see Section 3.15), and some of those workers may commute up to 2 hours each way. However, as described in the EPRI report, many workers are also likely to engage in weekly commuting or otherwise temporarily relocate to the Blythe area while working at the Project site.

Figure 3.15-1 depicts a map of areas within 60, 90, and 120 minutes of travel time from the Project site. To simplify the analysis by focusing on the most likely communities of residence for commuters, those cities and communities within 30 minute drive times are specifically included in the analysis, as are all cities and communities with populations over 20,000 individuals within 60 minutes, and all cities with populations over 40,000 individuals within a 120 minute drive time. For San Bernardino, Mohave, and Yuma counties, no cities or communities with populations over 40,000 individuals are within a two-hour drive, so therefore no communities in these counties are specifically discussed. However, the counties are included in some accompanying tables because rural locations and some smaller communities in these counties are within the two-hour commute radius.

Figure 3.15-1 depicts the counties and communities relevant to this analysis along with approximate drive times from the Project site. These cities and communities include Blythe, Cathedral City, Coachella, El Centro, Indio, Mesa Verde, Palm Desert, Palm Springs, Palo Verde, and Ripley, in California; and Buckeye, Cibola, Ehrenberg, and Quartzsite in Arizona.

Economic and employment data are generally available only for counties or metropolitan statistical areas (MSAs) consisting of whole counties. For this analysis, therefore, the socioeconomic regional study area consists of Imperial and Riverside counties (California), and La Paz and Maricopa counties (Arizona), with special attention paid to Riverside and La Paz counties, as they are more likely affected by the Project than the more distant Imperial and Maricopa counties. Where important additional data are available for Riverside-San Bernardino-Ontario MSA, consisting of Riverside and San Bernardino counties, they are used for reference. With respect to housing analysis, data for counties are supplemented with those for cities and communities identified above.

Per guidelines shown in BLM Land Use Planning Handbook, the analysis of a proposed action of this type needs to consider existing socioeconomic conditions and impacts on several geographic scales. As noted above, at the regional scale, this analysis examines data for Imperial, Riverside, Maricopa, and La Paz counties, as well as Riverside-San Bernardino-Ontario MSA, where appropriate. At the local scale, the analysis examines the communities identified above within the 2-hour travel area, although particular consideration is given to the nearest communities of Blythe, California (approximately 10 miles east of the site) and Ehrenburg, Arizona (approximately 13 miles east of the site).

3.15.1 Population

Population estimates and recent growth trends for both the regional and local study areas are summarized in Table 3.15-1. Historical data (2000, 2010 U.S. Census data) and 2016 estimates are shown for the two counties and the states of California and Arizona, for context (Cal DOF 2016a; ADAO 2016a). Projections for future growth (through 2050) are prepared for counties by the respective states (California Department of Finance [Cal DOF 2016b] and Arizona Department of Administration [ADOA 2016b]), but not for cities.

Riverside County is the fourth most populous county in California. The population of Riverside County grew from 1,545,387 in 2000 to 2,347,828 in 2016, a 3.2 percent average annual increase, according to the California Department of Finance (Cal DOF 2016a). Between 2000 and 2016, Riverside County grew at a much faster rate than San Bernardino County (1.6 percent average annual growth), and California as a whole (1.0 percent average annual growth). In Arizona, La Paz

County had the lowest average annual growth from 2000 to 2015 (0.5 percent) of all counties within the study area, which includes Maricopa (1.9 percent average annual growth), Mohave (2.0 percent average annual growth), and Yuma (2.0 percent average annual growth) counties (ADOA 2016a).

Population growth in Riverside County is expected to decrease from current rates over the next few decades. The growth rate is projected to be 1.2 percent per year between 2010 and 2020, 1.5 percent per year between 2020 and 2030, and 1.0 percent per year between 2030 and 2050. Growth rates across both states and in La Paz County are expected to decrease through 2050, with a 0.6 percent per year rate between 2030 and 2050 in California and a 1.2 percent per year rate for the same time period in Arizona (Cal DOF 2016b ADOA 2016b). It is possible these projections may be modified as a result of increased or decreased economic activities, as the economic recession that occurred between December 2007 and June 2009 had a substantial effect on population projections in the region.

Table 3.15-2 shows the populations of the affected cities and communities in 2000, 2010, and 2014, along with annual average growth rates from 2000-2014. The cities that experienced the highest rates of population growth between 2000 and 2014 were Buckeye (17.0 percent annually), Coachella (4.8 percent annually) and Indio (3.8 percent annually). The communities of Blythe and Quartzite had average annual growth rates of -0.5 percent and 0.9 percent, respectively.

Table 3.15-1. Population Estimates, Projections, and Average Annual Growth Rates, 2000-2050

Geography	2000	2010	2015/2016 ¹	Average Annual Growth Rate 2000-2015/2016 ¹	2020 Projection	Average Annual Growth Rate 2010-2020	2030 Projection	Average Annual Growth Rate 2020-2030	Total 2050 Projection	Average Annual Growth Rate 2030-2050
California										
Imperial County	142,361	174,528	185,831	1.9	211,973	2	252,300	1.8	314,346	1.1
Riverside County	1,545,387	2,189,641	2,347,828	3.2	2,478,059	1.2	2,862,915	1.5	3,480,980	1
San Bernardino County	1,710,139	2,035,210	2,139,570	1.6	2,227,066	0.9	2,515,972	1.2	2,997,446	0.9
California	33,873,086	37,253,956	39,255,883	1.0	40,619,346	0.9	44,085,600	0.8	49,779,362	0.6
Arizona										
La Paz County	19,715	20,489	21,183	0.5	21,500	0.5	22,000	0.2	22,900	0.2
Maricopa County	3,072,149	3,817,117	4,076,438	1.9	4,480,900	1.6	5,280,100	1.7	6,698,400	1.2
Mohave County	155,032	200,186	205,716	2	220,700	1	250,600	1.3	310,900	1.1
Yuma County	160,026	195,751	214,991	2	232,800	1.7	269,700	1.5	345,700	1.2
Arizona	5,130,632	6,392,017	6,758,251	1.9	7,346,800	1.4	8,535,900	1.5	10,820,900	1.2

Note:

1- Most recent available population estimates are 2016 for California, and 2015 for Arizona.

Sources: Cal DOF 2016a - <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/>

Cal DOF 2016b - <http://www.dof.ca.gov/Forecasting/Demographics/Projections/>

ADOA 2016a - <https://population.az.gov/population-estimates>

ADOA 2016b - <https://population.az.gov/population-projections>

Table 3.15-2. Study Area Communities Population Estimates and Average Annual Growth Rates, 2000-2014

Geography	2000	2010	2014	Average Annual Growth Rate 2000-2014
California				
Blythe	20,465	20,817	18,982	-0.5
Cathedral City	42,647	51,200	52,571	1.5
Coachella	22,724	40,704	43,601	4.8
El Centro	38,025	42,598	44,847	1.2
Indio	49,116	76,036	82,375	3.8
Mesa Verde	no data	1,023	no data	--
Palm Desert	41,155	48,445	50,424	1.5
Palm Springs	42,805	44,552	46,135	0.5
Palo Verde	236	171	no data	--
Ripley	no data	692	no data	--
Arizona				
Buckeye	6,537	50,876	58,795	17
Cibola	172	210	no data	--
Ehrenberg	1,357	1,470	no data	--
Quartzsite	3,354	3,677	3,801	0.9

Sources: <http://www.dof.ca.gov/research/demographic/Estimates/>
<https://population.az.gov/population-estimates>
<http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml###>

3.15.2 Housing

Table 3.15-3 presents the housing resources in the study area, including the counties of Imperial, Riverside, Maricopa, and La Paz, and the major communities within the 2-hour drive area. The data are compiled from the U.S. Census American Community Survey, which provides an estimate for each geography for 2013. In 2013, Riverside County had 805,142 total housing units. The total vacancy rate was 15.2 percent, and 2.3 percent of the units were available for rent. La Paz County had a relatively high percentage of vacant housing units (36.4 percent), with 1.8 percent of the total housing units available for rent. Of the communities in the region, Ehrenberg and Cibola had the highest vacancy rates (both at 48.2 percent); however, Cibola had no housing units for rent whereas Ehrenberg had one of the highest percentages of vacant housing units available for rent (5.1 percent). Of the communities closest to the proposed Project site, Blythe had a total vacancy rate of 16.7 percent, with 3.2 percent of housing units available for rent; Mesa Verde had 4.5 percent of all housing units available for rent.

Table 3.15-3. Study Area Housing Characteristics, 2009-2013 Averages

Geography	Total Housing Units	Occupied Housing Units			Vacant Housing Units			
		Total	Owner Occupied	Renter Occupied	Total		For Rent	
California	13,726,869	12,542,460	6,939,104	5,603,356	1,184,409	8.60%	292,195	2.10%
Blythe	6,087	5,072	2,787	2,285	1,015	16.70%	196	3.20%
Cathedral City	20,925	16,639	10,414	6,225	4,286	20.50%	468	2.20%
Coachella	10,113	9,238	5,955	3,283	875	8.70%	150	1.50%
El Centro	14,225	12,925	6,529	6,396	1,300	9.10%	397	2.80%
Indio	30,171	24,371	15,442	8,929	5,800	19.20%	692	2.30%
Mesa Verde	401	369	286	83	32	8.00%	18	4.50%
Palm Desert	39,534	23,904	15,452	8,452	15,630	39.50%	1,335	3.40%
Palm Springs	35,876	22,650	12,994	9,656	13,226	36.90%	1,216	3.40%
Palo Verde	91	19	0	19	72	79.10%	0	0.00%
Ripley	255	216	46	170	39	15.30%	0	0.00%
Imperial County	56,234	48,099	27,107	20,992	8,135	14.50%	1,226	2.20%
Riverside County	805,142	683,144	454,455	228,689	121,998	15.20%	18,183	2.30%
Arizona	2,859,768	2,370,289	1,527,475	842,814	489,479	17.10%	95,514	3.30%
Buckeye	18,385	14,703	9,982	4,721	3,682	20.00%	432	2.30%
Cibola	224	116	108	8	108	48.20%	0	0.00%
Ehrenberg	826	428	169	259	398	48.20%	42	5.10%
Quartzsite	3,221	2,142	1,959	183	1,079	33.50%	0	0.00%
La Paz County	16,062	10,221	7,566	2,655	5,841	36.40%	286	1.80%
Maricopa County	1,648,392	1,411,727	882,862	528,865	236,665	14.40%	62,970	3.80%

Source: <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

Temporary housing in the Project area includes rental homes, hotel and motel rooms, which are present throughout the study area and are typically concentrated in urban areas or near major transportation facilities. Other types of temporary housing units within the study area that may be used include campgrounds and RV parks.

Rental Homes

As discussed above in Table 3.15-3, vacancy rates are high in the study area, but overall rental rates are much lower. Estimates for 2013 state that 1,015 units in the City of Blythe were vacant and that 196 units were for rent. An additional 42 units in Ehrenberg were vacant for rent. Of the

relatively larger communities in the study area, the largest proportion of housing units available for rental were in the communities of Palm Desert and Palm Springs, although these communities are over 60 minutes away from the proposed Project site.

Hotel and Motel Accommodations

In addition to existing residential units, construction workers and operational workers could use other local lodging facilities as temporary housing. Temporary housing in the form of hotel/motel rooms are typically concentrated in urban areas or near major transportation nodes. For the purposes of this analysis, only those hotels in the communities closest to the proposed action were tabulated under the assumption that construction and operations workers would congregate in this area for ease of commuting.

In the community of Blythe, 21 hotels and motels were identified with an estimated total of 1,040 rooms (HotelGuides 2015; Hotels.com 2015; YP.com 2015). One hotel was identified in Ehrenberg, which had 84 rooms. Three hotels were identified in the nearby community of Quartzsite, with a total of 70 rooms. Airbnb rentals near the community of Blythe numbered five, although only one property was in Blythe and the other four were located in either Ehrenberg or Quartzsite.

The extent that the local motel and hotels within the local study area could provide temporary housing for DQSP construction workers would depend both on current room rates and occupancy rates. Typical room rates for most of the hotel/motels are currently relatively inexpensive during the off-season with quoted rates of \$60 to \$95 per night (not including tax). Provided operators maintain comparable rates, these local hotel and motel rooms would provide an option for temporary housing, particularly for workers that might be willing to share accommodations.

Considerable additional hotel and motel facilities are available in the other communities located within 1 to 2 hours' drive of the DQSP site, including Indio, Palm Desert, Indian Wells, Rancho Mirage, Desert Hot Springs, Palm Springs, and several other small communities. Another 165 hotels with a total of 14,842 rooms were identified in these communities (Smith Travel Research 2008, as cited in Genesis Solar, LLC 2009).

Although eastern Coachella Valley (Palm Desert, Indio, and points east) has a substantial number of hotel and motel accommodations, the attractiveness of these resources for construction workers is low, due to the great distance of nearly 2 hours of travel time from the Project site. Furthermore, given their location near business and recreation centers, it is likely that these hotels and motels would have higher room rates and, therefore, would not be as suitable temporary housing for DQSP workers.

Campgrounds and RV Parks

In addition, other housing opportunities are available in the form of RV facilities, mobile home sites, and campgrounds. Under some circumstances, these types of facilities could be usable by DQSP construction workers as temporary housing. Generally their lower costs for overnight use could make them attractive as a potential temporary housing resource. Particularly for construction workers who may own their own RV or trailers, RV parks with utility hook-ups and other amenities could serve as a longer-term rental for workers who prefer a weekly commute.

There are at least 11 RV parks located in the vicinity of Blythe (including Ehrenberg). In Blythe, at least seven RV parks are present, with a combined total of approximately 1,000 spaces. At least

four RV parks are located in Ehrenberg, with a combined total of approximately 400 spaces. (RV Park Reviews 2015; Google 2015). RV parks in Blythe and Ehrenberg tend to be located along the Colorado River and receive higher levels of use during the summer. Research on small sample of these RV parks suggests that, while they have a large number of spaces, many are occupied by year-round residents or are privately owned and, therefore, would not be available for use by construction workers (Genesis Solar, LLC 2009). Additional RV parks are located in Quartzsite, Arizona, approximately 20 miles east of Blythe. The Quartzsite Chamber of Commerce states there are more than 70 campgrounds in the vicinity of the community that are typically occupied between October and March, with visitors attracted to the gem, mineral, and swap meet shows which are popular tourist attractions in the area (Quartzsite Business Chamber of Commerce 2016).

BLM operates two campgrounds in the general vicinity of the local study area: Wiley's Well Campground and Coon Hollow Campground, both located south of I-10 on Wiley's Well Road within the Mule Mountain LTVA. Both are year-round facilities with campsites, picnic tables, grills, shade armadas, and handicapped-accessible vault toilets (BLM 2011b). Except for "special areas" with specific camping regulations, vehicle camping is allowed anywhere on BLM-administered land within 300 feet of any posted Open Route outside of ACECs, or 100 feet of any posted Open Route within ACECs. However, there are no facilities in these locations, and there is a 14-day limit for camping in any one location. After 14 days, campers wishing to stay in the area longer are required to move 25 miles from their original camp site, and may not return for 28 days. Long-term camping is available for up to 7 months by a long-term Special Recreation Permit (SRP) in LTVAs on BLM lands between September 15 and April 15. Short-term camping, requiring a short-term SRP for up to 14 days, is available in LTVAs between the dates of April 15 to September 15. There is no trash pick-up and toilets are closed in this period. There are two LTVAs located in the vicinity of Blythe and the Project site: Mule Mountain, within which camping is only allowed at designated sites within the Wiley's Well and Coon Hollow campgrounds, and Midland, located north of the City of Blythe. BLM also operates another LTVA within the study area at La Posa, south of I-10 near Quartzsite, Arizona (BLM 2007).

3.15.3 Economic Conditions

Study area employment statistics by industry sector and county for 2009-2013 are summarized in Table 3.15-4. Educational and health services industries are the largest employers in Riverside County. This sector accounts of over 20 percent of the total jobs in Riverside County. Additional industries with high proportions of total employees in the County include retail trade; arts, entertainment, recreation, accommodation, and food service; and professional and business services. Educational and health services industries are also the largest employers in La Paz County. This sector accounts for nearly 18 percent of the total jobs in La Paz County. Additional industries with high proportions of total employees in the County include government; agriculture, forestry, fishing, and hunting, and arts, entertainment, recreation, accommodation, and food service.

In Riverside and La Paz counties, the construction industries account for 8.2 percent and 4.5 percent of employment, respectively. In Imperial and Maricopa counties, the construction industries account for 5.1 and 6.7 percent of employment, respectively. The sector with the lowest number of persons employed is mining, quarrying, and oil and gas extraction, with approximately 4,000 employees across all four counties.

Table 3.15-5 presents the total projected new jobs by occupation for Riverside and San Bernardino counties. For the purposes of employment data tabulation, the California Employment Development Department (EDD) groups Riverside and San Bernardino counties as one statistical area; hence, they are presented in Table 3.15-4 together. Data for projected jobs were not available for Arizona counties; however, long-term industry employment projections are available for the state. The highest number of new jobs projected in Riverside and San Bernardino counties is expected to be in retail sales. Job growth is also anticipated for laborers and material movers, food preparers, and cashiers. The projected job growth for construction laborers was 8,510 from 2012-2022. In Arizona, the construction sector is forecast to gain 60,100 jobs, with the largest employment gains expected in the “specialty trades” sub-sectors (ADOA 2015). Table 3.15-6 presents the percentage change of projected new jobs for Riverside and San Bernardino counties for the same period. Many occupations with high rates of job growth (by percentage) are related to construction, including brick masons and block masons, iron workers, and cement masons.

Table 3.15-7 presents county employment figures for those skilled workers (by craft) likely required for construction and operation of the Project. Employment figures for 2012 are provided, as well as employment projections for the selected occupations for 2022. As stated above, the EDD groups Riverside and San Bernardino into one statistical area for data presentation purposes; thus, these two counties are presented together in Table 3.15-7. As of 2012, there were relatively high numbers of skilled workers in Riverside and San Bernardino County, including construction workers (49,660), maintenance and repair workers (48,730), and construction laborers (12,310). Relevant specialized positions were generally fewer in number for Riverside and San Bernardino counties, including paving, surfacing, and tamping equipment operators, power plant operators, and metal/plastic workers. Employment figures for all occupations presented are anticipated to either remain constant or grow by 2022. The two occupations with the largest anticipated growth (by absolute number) are construction workers (24,210 new positions) and maintenance/repair workers (10,870 new positions); the two occupations with the largest anticipated growth by percentage are construction helpers (66.5 percent increase) and cement masons (64.3 percent increase).

As of September 2015, Riverside County had a labor force of 1,016,700 workers, of which 952,800 were employed. In Arizona, La Paz County had a labor force of 8,011 workers, of which 7,374 were employed. As presented in Table 3.15-8, the highest unemployment rate in study area communities was in Ripley (23.6 percent), followed by Mesa Verde (22.4 percent). Of the larger communities in the study area, the communities with the highest rates of unemployment were El Centro (22.0 percent) and Coachella (9.7 percent). The community of Blythe had 6,600 workers in its labor force, of whom 6,200 were employed, for an unemployment rate of 7.0 percent. Per capita income was highest in Palm Desert (over \$40,000) and was lowest in Ripley (almost \$8,800). In the nearby communities of Blythe and Ehrenberg, the per capita income estimates were \$16,329 and \$22,205, respectively.

Table 3.15-4. Employment by Industry Group, 2009-2013 Averages

Industry Group	Imperial County		Riverside County		California		La Paz County		Maricopa County		Arizona	
	Total	Percent	Total	Percent	Total	Percent	Total	Percent	Total	Percent	Total	Percent
Agriculture, forestry, fishing and hunting	5,252	9	13,032	1.5	358,412	2.2	1,034	15.6	7,696	0.4	25,427	0.9
Mining, quarrying, and oil and gas extraction	289	0.5	690	0.1	29,099	0.2	13	0.2	3,050	0.2	14,968	0.5
Construction	2,994	5.1	72,017	8.2	996,922	6	298	4.5	116,069	6.7	181,102	6.7
Manufacturing	3,228	5.5	81,173	9.3	1,659,850	10	186	2.8	139,514	8	204,219	7.5
Wholesale Trade	1,685	2.9	29,676	3.4	525,795	3.2	152	2.3	47,134	2.7	66,440	2.4
Retail Trade	7,600	13.1	114,208	13	1,850,696	11.1	751	11.3	211,807	12.2	332,224	12.2
Transportation, Warehousing, and Utilities	4,023	6.9	47,094	5.4	773,145	4.6	345	5.2	88,809	5.1	133,643	4.9
Information	724	1.2	14,384	1.6	471,345	2.8	17	0.3	34,154	2	49,891	1.8
Financial Activities	2,345	4	47,236	5.4	1,068,711	6.4	284	4.3	165,175	9.5	215,268	7.9
Professional and Business Services	3,392	5.8	87,990	10	2,099,358	12.6	224	3.4	222,834	12.8	316,142	11.6
Educational and Health Services	14,017	24.1	181,003	20.6	3,497,445	21	1,168	17.6	367,711	21.2	605,203	22.2
Arts, Entertainment, Recreation, Accommodation, and Food Service	3,887	6.7	96,865	11	1,628,085	9.8	783	11.8	170,914	9.9	290,762	10.7
All Other Services	2,306	4	45,966	5.2	893,566	5.4	336	5.1	83,247	4.8	131,979	4.8
Government	6,427	11	45,696	5.2	783,425	4.7	1,044	15.7	76,527	4.4	154,598	5.7
Total	58,169	100	877,030	100	16,635,854	100	6,635	100	1,734,641	100	2,721,866	100

Source: <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

Table 3.15-5. Occupational Employment Projections: Top 10 Occupations by Total Increased Number, Riverside and San Bernardino Counties, 2012-2022

Occupation	Number of New Jobs Projected
Retail Salespersons	24,590
Laborers and Freight, Stock, and Material Movers, Hand	21,060
Combined Food Preparation and Serving Workers, Including Fast Food	20,750
Cashiers	20,200
Personal Care Aides	17,980
Waiters and Waitresses	13,700
Heavy and Tractor-Trailer Truck Drivers	9,950
Office Clerks, General	9,250
Stock Clerks and Order Fillers	8,830
Construction Laborers	8,510

Source: [http://www.labormarketinfo.edd.ca.gov/file/occproj/rive\\$occmmost.xlsx](http://www.labormarketinfo.edd.ca.gov/file/occproj/rive$occmmost.xlsx)

Table 3.15-6. Occupational Employment Projections: Top 10 Occupations by Percent Increased Change, Riverside and San Bernardino Counties, 2012-2022

Occupation	Estimated Employment 2012	Projected Employment 2022	Percent Change	Annual Average Change
Brick masons and Block masons	710	1,420	100	0.1
Helpers – Brick masons, Block masons, Stone masons, and Tile and Marble Setters	460	890	93.5	0.09
Reinforcing Iron and Rebar Workers	480	800	66.7	0.07
Cement Masons and Concrete Finishers	1,960	3,220	64.3	0.06
Fence Erectors	570	930	63.2	0.06
Tile and Marble Setters	1,140	1,840	61.4	0.06
Cost Estimators	2,100	3,350	59.5	0.06
Painters, Construction and Maintenance	3,440	5,450	58.4	0.06
Personal Care Aides	27,620	43,630	58	0.06
Roofers	1,280	2,020	57.8	0.06

Source: [http://www.labormarketinfo.edd.ca.gov/file/occproj/rive\\$occfastest.xlsx](http://www.labormarketinfo.edd.ca.gov/file/occproj/rive$occfastest.xlsx)

3.15.4 Government Tax Revenues

A summary of Riverside County’s revenues and expenditures for fiscal years (FY) 2012-13 and 2013-14 is provided in Table 3.15-9. As the Project would be constructed in unincorporated Riverside County, it would be the local agency receiving most of the direct fiscal impacts from the DQSP in the form of additional expenses or revenues.

Table 3.15-7. Occupational Employment Projections: Project-Relevant Occupations, Riverside and San Bernardino Counties, 2012-2022

Occupation	Annual Average Employment		Employment Change			Average Annual Job Openings		
	2012	2022	Number	Percent (2012-2022)	Annual Average Percent Change	New Jobs	Net Replacements	Total
Construction Managers	4,040	5,380	1,340	33.20%	3.30%	134	64	198
Construction Workers	49,660	73,870	24,210	48.80%	4.90%	2,422	828	3,250
Carpenters	9,610	14,030	4,420	46.00%	4.60%	442	118	560
Cement Masons and Concrete Finishers	1,960	3,220	1,260	64.30%	6.40%	126	23	149
Construction Laborers	12,310	18,180	5,870	47.70%	4.80%	587	264	851
Paving, Surfacing, and Tamping Equipment Operators	750	900	150	20.00%	2.00%	14	11	25
Operating Engineers and Other Construction Equipment Operators	2,990	3,920	930	31.10%	3.10%	93	66	159
Drywall and Ceiling Tile Installers	2,320	3,630	1,310	56.50%	5.60%	131	22	153
Electricians	3,920	5,590	1,670	42.60%	4.30%	167	74	241
Painters, Construction and Maintenance	3,440	5,450	2,010	58.40%	5.80%	201	52	253
Plumber, Pipefitters, and Steamfitters	2,520	3,620	1,100	43.70%	4.40%	110	31	141
Metal Workers and Plastic Workers	510	540	30	5.90%	0.60%	3	6	9
Helpers - Construction Trades	1,820	3,030	1,210	66.50%	6.60%	122	28	150
Maintenance and Repair Workers, General	48,730	59,600	10,870	22.30%	2.20%	1,090	1,140	2,230
Welders, Cutters, Solderers, and Brazers	2,590	2,960	370	14.30%	1.40%	38	63	101
Plant and System Operators	2,090	2,130	40	1.90%	0.20%	9	71	80
Power Plant Operators	510	520	10	2.00%	0.20%	0	16	16
Architects, Surveyors, and Cartographers	910	1,140	230	25.30%	2.50%	24	20	44
Engineering Managers	1,020	1,170	150	14.70%	1.50%	15	25	40
Supervisors of Construction and Extraction Workers	4,280	6,350	2,070	48.40%	4.80%	207	46	253
Machinists	3,370	3,840	470	13.90%	1.40%	48	77	125

Source: [http://www.labormarketinfo.edd.ca.gov/file/ocoproj/rive\\$ocoproj.xlsx](http://www.labormarketinfo.edd.ca.gov/file/ocoproj/rive$ocoproj.xlsx)

Table 3.15-8. Study Area Communities Employment Statistics and Per Capita Income, September 2015

Geography	Civilian Labor Force	Total Employment	Number Unemployed	Unemployment Rate	Per Capita Income*
California					
Blythe	6,600	6,200	500	7.00%	\$16,329
Cathedral City	25,000	23,800	1,300	5.10%	\$19,815
Coachella	18,000	16,200	1,700	9.70%	\$11,874
El Centro	21,500	16,800	4,700	22.00%	\$18,877
Indio	36,400	33,900	2,500	6.80%	\$20,607
Mesa Verde*	490	380	110	22.40%	\$12,541
Palm Desert	22,900	21,900	1,000	4.50%	\$40,266
Palm Springs	21,700	20,600	1,100	5.10%	\$35,578
Palo Verde*	19	19	0	0.00%	--
Ripley*	216	165	51	23.60%	\$8,765
Imperial County	79,700	60,800	18,800	23.60%	\$16,763
Riverside County	1,016,700	953,000	63,700	6.30%	\$23,591
Arizona					
Buckeye	22,993	21,558	1,435	6.20%	\$20,318
Cibola*	78	73	5	6.40%	\$26,722
Ehrenberg*	430	380	50	11.60%	\$22,205
Quartzsite*	1,011	811	200	19.80%	\$24,514
La Paz County	7,712	7,079	633	8.20%	\$22,200
Maricopa County	2,013,838	1,905,798	108,040	5.40%	\$27,256

Sources: *taken from FactFinder 2009-2013 American Community Survey 5-Year Estimates

**taken from azstats.gov 2014

<http://www.labormarketinfo.edd.ca.gov/cgi/dataanalysis/areaselection.asp?tablename=labforce>

<http://azstats.gov/laus-data-query-tool/>

Arizona towns come from: <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

Per Capita income comes from: <http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

Table 3.15-9. Riverside County Revenues and Expenses, 2012-2015

Category	2012-2013	2013-2014	2014-2015 (Adopted)
Revenues			
Taxes	301,659,506	314,135,999	314,057,747
Licenses, Permits, and Franchises	18,798,544	20,376,429	21,224,480
Fines, Forfeitures, and Penalties	85,583,933	81,488,872	72,631,740
Revenues from Use of Money and Property	16,530,929	24,977,255	19,029,344
Intergovernmental Revenues	1,610,104,565	1,699,347,379	1,921,670,146
Charges for Current Services	585,939,607	608,667,661	781,519,984
Other In-Lieu and other Governments	6,369,710	11,375,829	12,277,423
Other Revenue	248,260,280	241,022,153	247,002,743
Total	2,873,247,074	3,001,391,577	3,389,413,607
Expenditures			
General Government	470,009,756	331,627,307	413,715,912
Public Protection	1,128,003,047	1,204,077,243	1,260,671,787
Public Ways and Facilities	191,617,433	189,569,440	239,581,311
Health and Sanitation	403,013,005	429,370,012	485,261,035
Public Assistance	814,977,120	868,422,787	975,714,648
Education	23,120,303	21,909,602	22,178,862
Recreation and Cultural Services	824,582	758,657	351,072
Debt Service	34,626,943	39,855,533	43,779,831
Total	3,066,192,189	3,085,590,581	3,441,254,458

Source: <http://countyofriverside.us/Portals/0/Government/Budget%20Information/2014-2015%20Adopted%20Budget/FY15AdoptedBudgetWeb.pdf>

For FY 2013-14, new revenues for governmental funds (General Fund and other funds for general governmental functions, excluding proprietary and special district funds) of Riverside County totaled approximately \$3.00 billion, and expenditures totaled \$3.09 billion (Riverside County 2015d). The excess of expenditures over revenues was funded through the use of reserves and designations from previous fiscal years. The largest sources of revenue are intergovernmental revenues (state and Federal; \$1.70 billion), charges for current services (\$0.61 billion), and taxes (property, sales, and other taxes; \$0.31 billion). The largest expenditure categories are public protection (sheriff, corrections, courts, and fire protection; \$1.20 billion) and public assistance (\$0.87 billion).

Without access to property taxation on most components of a new solar energy project, the County must rely principally on sales tax revenues on construction materials and supplies to fund expenditures for public services related to the Project. Riverside County's key expenditures were on public assistance, public safety, and health. The County acknowledges that the economic slowdown may result in revenues lower than past projections which may lead to cutbacks in services.

3.15.5 Stakeholders

This section discusses some groups of individuals who could be affected by the Project, based on BLM's previous experience during the environmental review processes for other utility-scale solar projects in eastern Riverside County. Social effects to these groups and other stakeholders are discussed under Section 4.15, *Social and Economic Effects*.

Identification of these groups does not imply that other stakeholders may not be affected by the Project or are outside of the social and environmental review process. Discussion of the affected groups is a means of highlighting and facilitating review of issues of potential significance for those stakeholders who have a particular local or regional relationship to the Project site or Proposed Action.

Blythe Area Chamber of Commerce

The Blythe Area Chamber of Commerce provides a forum for local businesses and residents on important community issues. The Chamber of Commerce maintains a directory of all the businesses in Blythe and promotes the city's business economy. The purpose of the Blythe Area Chamber of Commerce is to encourage and facilitate activities that improve the economic viability of this community, provide a forum for guidance and support, provide opportunities to inform, and seek funds necessary for implementing compatible activities that would improve this agricultural community. The Chamber of Commerce has supported other utility-scale solar projects in the Blythe area and would likely support the Project.

Environmental Groups

Several national and local groups, including the Sierra Club, Wilderness Society, Natural Resources Defense Council, Defenders of Wildlife, Center for Biological Diversity, and Western Watersheds Project, have expressed concerns about the siting criteria used for renewable energy projects proposed for development in sensitive biological resource areas. Environmental groups also have concerns regarding impacts on wildlife movement corridors, impacts on special status species associated with the implementation of solar panels (e.g., shading effects on species), climate change/GHG emission-related impacts on plants and wildlife, and impacts on desert hydrology and landscapes.

Local Private Land Owners and Residents

Although the Project would be developed mostly on BLM land, a portion of the solar plant would be located on private land surrounded by BLM land. This land is currently vacant, and no comments in opposition to the Project have been received from local land owners during the scoping process for this Project.

Native American Tribes and Tribal Representatives

Native American tribal representatives have commented on the development of other large-scale solar projects in the area regarding the inadvertent discovery of cultural resources and the development of desert landscapes that contain evidence of their ancestors' use. Common concerns include the disturbance of cultural resources, the final disposition of recovered cultural materials, and the monitoring of ground disturbing activities during construction phases. Tribes in the area have successfully litigated against industrial developments in the region.

Project Workers and Suppliers to the Renewable Energy Industry

The DQSP has the potential to affect both local and non-local labor force from surrounding areas in Riverside and La Paz counties. Construction and operation of the Project would require both temporary and long-term workers, which would increase demand for labor, and would present an opportunity for the sale of materials and supplies by firms in the renewable energy industry.

Recreational Users

Recreational users include OHV users, hikers, campers, and wildlife viewing enthusiasts. The recreational user group has a deep appreciation for the natural desert landscape, and their social attitudes are participatory and protective of this resource. This group is concerned with the indirect impacts associated with the displacement of recreational lands by solar energy facilities, including the cumulative loss of land available for OHV recreational uses.

3.16 Special Designations and Lands with Wilderness Characteristics

3.16.1 Regional Setting

Special designations within this regional setting, as shown in Figure 3.16-1, include seven components of the National Wilderness Preservation System: Palen-McCoy Wilderness (approximately 18 miles northwest), Rice Valley Wilderness (approximately 19 miles north), Big Maria Mountains Wilderness (approximately 12 miles northeast), Palo Verde Mountains Wilderness (approximately 10 miles south), Trigo Mountain Wilderness (approximately 19 miles southeast), Chuckwalla Mountains Wilderness (approximately 19 miles west), and Little Chuckwalla Mountains Wilderness (approximately 11 miles southwest).

As shown in Figure 3.16-1 and Table 3.14-1, 12 ACECs are within 20 miles of the Project area. Of these, five (Mule Mountains, Chuckwalla Valley Dune Thicket, Chuckwalla, Big Marias, and Palen Dry Lake) existed at the time the DQSP application was submitted, and seven more (Mule McCoy Linkage, McCoy Wash, McCoy Valley, Upper McCoy, Chuckwalla to Chemehuevi Tortoise Linkage, Palen Ford Playa Dunes, and Picacho) were designated in 2016 as part of DRECP.

The eastern terminus of the Bradshaw Trail Back Country Byway is located approximately 4 miles south of the Project, and traverses westerly for approximately 70 miles.

There are also two LTVAs within the Project vicinity; please see Section 3.14, *Recreation and Public Access*, for a detailed discussion of these two designated areas.

3.16.2 Project Setting

No Congressional or Administrative special designations, Wilderness Areas, or Wilderness Study Areas exist at or are immediately adjacent to the Project. In addition, no lands with wilderness characteristics exist on or adjacent to the Project site.

3.16.3 Wilderness Characteristics Review

The land area associated with the Project site is included within two different units inventoried for wilderness characteristics. These two units, unique identifier CDCA 1351-1 and CDCA 1351A-1, were found to have no wilderness characteristics in the 1979 inventory, because neither unit included 5,000 acres of contiguous land area. Both units were re-inventoried in 2016 and again found to have no wilderness characteristics. The nearest land found to have wilderness characteristics is located on the eastern end of the Little Chuckwalla Mountains Wilderness Area, approximately 10 miles southwest of the Project site.

3.16.4 Designated Wilderness Areas

Designated Wilderness Areas in the vicinity of the Project are shown on Figure 3.16-1. The Wilderness Areas in the vicinity of the Project site are:

- The Palen-McCoy Wilderness Area, located approximately 7 miles northwest of the Project area, encompasses approximately 236,488 acres (BLM 2014a).

- The Big Maria Mountains Wilderness, located approximately 10 miles northeast of the Project area, is 45,384 acres in size (BLM 2014b).
- The Rice Valley Wilderness, located approximately 25 miles northwest of the Project area, is 41,777 acres in size (BLM 2014c).
- The Little Chuckwalla Mountains Wilderness, located approximately 10 miles southwest of the Project area, is 28,034 acres in size (BLM 2014d).
- The Chuckwalla Mountains Wilderness, located approximately 20 miles west of the Project area, is 99,548 acres in size (BLM 2014e).
- The Palo Verde Mountains Wilderness, located approximately 10 miles south of the Project area, is 30,605 acres in size (BLM 2014f).
- The Trigo Mountain Wilderness, located approximately 19 miles south of the Project area, is 30,300 acres in size (BLM 2014g).

Motorized-vehicle access is prohibited in wilderness areas except as specifically provided for in the Wilderness Act and by reference in subsequent wilderness legislation (i.e., where access is required to private property, and where necessary to meet minimum requirements for the administration of the area for the purpose of the Act, including measures required in emergencies involving the health and safety of persons within the area).

3.16.5 Areas of Critical Environmental Concern

ACECs in the vicinity of the site are shown on Figure 3.16-1. The closest ACEC to the Project site is the 4,092-acre Mule Mountains ACEC, located approximately one mile southwest of the site. This ACEC was established to manage cultural resources, with the goal of protecting cultural values while providing for compatible public uses. The Mule-McCoy Linkage ACEC encompasses areas to the northwest, west, and southwest of the Project area, with portions found within approximately 2 miles both north and south of the Project. As shown in Table 3.14-1, the other 10 ACECs range in distance from 6 to 19 miles from the Project. As shown in Figure 3.16-1, the ACECs are generally situated north, west, and south of the Project area in the Mule Mountains, McCoy Mountains, and Palen and Ford Dry Lakes. Recreation uses allowed in ACECs are discussed in Section 3.14, *Recreation and Public Access*.

3.16.6 Back Country Byways

The BLM-administered portion of the Bradshaw Trail is a 70-mile Back Country Byway that begins about 35 miles southeast of Indio, California and ends about 14 miles southwest of Blythe (BLM 2010a; BLM 2012e). The trail was the first road through Riverside County, created by William Bradshaw in 1862 as an overland stage route beginning in San Bernardino, California, and ending at Ehrenberg, Arizona. The trail was used extensively between 1862 and 1877 to transport miners and passengers. The trail is a graded dirt road that traverses mostly public land between the Chuckwalla Mountains and the Chocolate Mountain Aerial Gunnery Range. Recreational opportunities on the trail primarily include camping and OHV use (BLM 2012e; Anderson 2015).

3.17 Transportation and Traffic

Because the Project site is located in a remote area, all materials and personnel would be brought to the site from surrounding communities within Riverside County, such as Blythe and Indio, as well as regions of Los Angeles County and towns in Arizona, such as Quartzite, Ehrenberg, and Cibola. Consequently, it is expected that all DQSP-related traffic would utilize Interstate 10 (I-10) for regional travel, and local roads between I-10 and the site for site access. Therefore, this analysis of transportation and traffic focuses on the local roads and I-10 in the vicinity of the Project site.

The Project area would be located in Riverside County approximately 2.75 miles southwest of the City of Blythe and 37 miles east of Desert Center (refer to Figure 1-1). The Project would be located south of I-10 and west of State Route (SR) 78. It is anticipated that most workers would be drawn from the Blythe/Palo Verde Valley region and the Desert Center region, with a smaller portion drawn from the Imperial Valley or eastern Riverside County region. Workers and delivery trucks would access the site using the SR-78 (Neighbours Boulevard) off-ramp from I-10. The roadways and intersections that would be used for the Project, and for which potential impacts have been evaluated, are shown in Figure 3.17-1. It is anticipated that the following four intersections within the traffic study area are likely to experience an increase in traffic volume during construction, and thus were selected for capacity evaluation:

- Intersection 1 – SR-78 (Neighbours Boulevard) and I-10 Westbound Ramps
- Intersection 2 – SR-78 (Neighbours Boulevard) and I-10 Eastbound Ramps
- Intersection 3 – SR-78 (Neighbours Boulevard) and 14th Avenue
- Intersection 4 – SR-78 (Neighbours Boulevard) and 16th Avenue

Similarly, the following four roadway segments were also selected for capacity evaluation:

- I-10 West of SR-78
- I-10 East of SR-78
- SR-78 South of I-10
- 16th Street West of SR-78

3.17.1 Regional and Local Roadway Facilities

In the Project area, I-10 is classified as a freeway with two lanes in each direction. Access to the site from I-10 is via the SR-78 (Neighbours Boulevard) interchange (Exit 236). Local access to the Project site is from 16th Avenue/Seeley Avenue.

3.17.2 Existing Traffic Volumes and Levels of Service

Traffic data were collected by the Applicant during typical weekdays in July 2011 for the two SR-78 and I-10 ramp intersections and in September 2014 for the other two SR-78 intersections (14th and 16th Avenues). The traffic counts include morning (7 to 9 am) and afternoon (4 to 6 pm) peak hour study intersection counts. The traffic counts collected in 2011 for the two SR-78 (Neighbours Boulevard) and I-10 ramp intersections have been updated to 2015 conditions (based on 2 percent annual growth).

Table 3.17-1 shows the intersection LOS and average delay results for the four key intersections under existing conditions, and in the peak year condition. All four intersections are unsignalized and are currently operating at LOS A.

Table 3.17-1. Peak Hour Intersection Conditions

Intersection	Existing		Peak Year	
	Average Delay (seconds/vehicle)	LOS	Average Delay (seconds/vehicle)	LOS
Morning (AM) Peak Hour				
1. SR-78 (Neighbours Blvd)/I-10 Westbound Ramps	9.1	A	9.2	A
2. SR-78 (Neighbours Blvd)/I-10 Eastbound Ramps	9.1	A	9.1	A
3. SR-78 (Neighbours Blvd)/14th Avenue	9.4	A	9.4	A
4. SR-78 (Neighbours Blvd)/16th Avenue	9.7	A	9.7	A
Afternoon (PM) Peak Hour				
1. SR-78 (Neighbours Blvd)/I-10 Westbound Ramps	9.2	A	9.2	A
2. SR-78 (Neighbours Blvd)/I-10 Eastbound Ramps	9.4	A	9.4	A
3. SR-78 (Neighbours Blvd)/14th Avenue	9.7	A	9.9	A
4. SR-78 (Neighbours Blvd)/16th Avenue	9.7	A	9.8	A

Source: URS 2016

Roadway Segments

Roadway segment counts for a 24-hour period were conducted during September 2014 for the four key road segments. Table 3.17-2 provides a summary of the existing and peak year road segment conditions, including existing average daily traffic (ADT), percentage of traffic from trucks, and LOS under existing and peak year conditions. As shown in the table, all roadway segments are below capacity with 30-38 percent of traffic from trucks. All study roadway segments are currently operating at LOS C.

Table 3.17-2. Roadway Segment Conditions

Roadway	Cross-section Classification	Roadway Capacity	Truck Percent	Existing Average Daily Traffic	Existing LOS	Peak Year Average Daily Traffic	Peak Year Base LOS
I-10 west of SR-78	4-lane freeway	68,900	38%	26,000	C	28,080	C
I-10 east of SR-78	4-lane freeway	68,900	37%	27,500	C	29,700	C
SR-78 south of I-10	2-lane undivided	16,200	30%	2,105	C	2,273	C
16th Avenue west of SR-78	2-lane collector	11,700	30%	117	C	126	C

Source: URS 2016

3.17.3 Project Access

Regional Access

I-10 is the nearest freeway to the Project site. It provides regional east/west travel throughout the state, beginning in Santa Monica, continuing through Los Angeles and east past the California state border to Arizona and beyond. In the vicinity of the Project area, I-10 has two lanes per direction. The posted speed limit is 70 miles per hour (mph), and trucks comprise 37 to 38 percent of traffic on I-10 (URS 2016b). SR-78 (Neighbours Boulevard, Exit 236) provides a full interchange with this freeway; the east and west I-10 ramps at SR-78 are stop sign controlled.

Local Access

The local roadway facilities in the vicinity of the Project area include SR-78 (Neighbours Boulevard) and 16th Avenue/Seeley Avenue.

SR-78 (Neighbours Boulevard) is a two-lane roadway running on a north/south alignment connecting to I-10 via an existing interchange (Exit 236). SR-78 contains one 12-foot-wide travel lane per direction and is divided by a double-yellow center line with paved shoulders. The posted speed limit on SR-78 is 55 mph, except through the Town of Ripley, where the speed limit is 45 mph. Land uses along SR-78 in the Project vicinity include rural residential, agricultural, and industrial land uses. SR-78 is also referred to by local street names including Neighbours Boulevard, 28th Avenue and Rannells Boulevard. SR-78 has been identified as a key critical segment by the Riverside County's Congestion Management Program.

16th Avenue/Seeley Avenue is a two-lane roadway running on an east/west alignment connecting to SR-78 (Neighbours Boulevard). The proposed access route to the Project site is via 16th Avenue, which approximately 1.5 miles west of SR-78 becomes Seeley Avenue. Seeley Avenue is a generally unpaved dirt road providing access to local farms and the Project site.

Site Access

Access to the site would be from 16th Avenue/Seeley Avenue via SR-78. The Project site would be accessed directly from 16th Avenue/Seeley Avenue.

3.18 Utilities and Public Services

3.18.1 Utilities

A variety of sources in Riverside County and the City of Blythe provide and maintain utility and service system facilities associated with water, solid waste, electricity, and natural gas. Underground Service Alert (also known as USA or “Dig Alert”), a non-profit organization supported by utility firms, provides specific information on the location of underground utilities to contractors upon request, prior to ground-disturbing construction activities.

Water and Wastewater

The water supplies used for the Project area’s agricultural irrigation and the water supplies underlying the Project area (Palo Verde Mesa Groundwater Basin), are under the jurisdiction of the Palo Verde Irrigation District (PVID). Colorado River water, supplied through PVID canals, is lifted onto the mesa by private pumps to irrigate a portion of the acreage in the PVID. The remaining mesa irrigated acreage is irrigated from deep wells developed by the landowners. An investigation of the property identified two wells located on BLM land within the proposed Project area. These two wells were unsecured and open, and BLM has no knowledge of their origin or use. A third well was identified in the northeast corner of the private land parcel. This well was capped and located near irrigation piping, and may have formerly been used to provide irrigation for agricultural activities on the parcel (URS 2015).

Sanitary needs during construction would be served by the use of portable toilets. Portable toilets would be serviced by licensed contractors, and waste would be regularly pumped and hauled to proper disposal facilities. During operations, sanitary needs would be supplied by a septic system and leach field located near the O&M Building. The onsite sanitary system would require construction and annual operating Onsite Wastewater Treatment System (OWTS) permits from the County.

Solid Waste Management

The Riverside County Waste Management Department operates seven landfills, seven transfer stations, and a grinding facility within the County. The nearest landfills that serve the Project area include the Blythe Landfill at 1000 Midland Road, which is approximately 17 miles north of the Project site, and Desert Center Landfill at 17-991 Kaiser Road in Desert Center, which is approximately 40 miles west of the Project site (Riverside County Waste Management Department 2016).

Natural Gas and Electricity

Southern California Gas Company (SCGC) provides gas service to the City of Blythe and surrounding Riverside County. SCGC’s service territory encompasses approximately 20,000 square miles in diverse terrain throughout Central and Southern California, from Visalia to the Mexican border.

Southern California Edison (SCE) provides electric service to residences and businesses in the City of Blythe and surrounding area. Currently, SCE has transmission lines ranging from 500 kV

to local distribution service lines of 12 kV. A major 500 kV transmission corridor passes through Palo Verde Valley and connects the Southern California market with generating plants located in Blythe and in the state of Arizona.

Stormwater

At present there are no stormwater facilities located on-site or in the immediate vicinity of the Project. Construction of the Project would include development of stormwater controls to manage runoff around and/or within the Project site.

3.18.2 Public Services and Facilities

Education

The Project area is located within the Palo Verde Unified School District. Palo Verde Unified School District serves Blythe and other remote areas of Riverside County and consists of three elementary schools, two middle schools, one high school, and a continuation high school. Palo Verde Unified School District is the district with authority to assess school impact fees from the Project. Table 3.18-1 includes the schools and enrollment in Palo Verde Unified School District.

Table 3.18-1. Summary of Schools and Enrollment in Palo Verde Unified School District, 2014-2015

School Name	Community	Grades	Location	Number of Students
Felix J. Appleby Elementary School	Blythe	K – 6	401 S. Third Street	555
Margaret White Elementary School	Blythe	K – 6	610 N. Broadway	607
Ruth Brown Elementary School	Blythe	K – 6	241 N. Seventh Street	625
Blythe Middle School	Blythe	7 – 8	825 N. Lovekin Blvd.	499
Palo Verde Valley Community Day	Blythe	6 - 10	190 North Fifth Street	12
Palo Verde High School	Blythe	9 - 12	667 N. Lovekin Blvd.	933
Twin Palms Continuation	Blythe	9 - 12	811 West Chanslor Way	101

Source: National Center for Education Statistics 2016.

Law Enforcement

BLM, the City of Blythe, and the Riverside County Sheriff’s Department provide law enforcement and public safety in the Project area. The City of Blythe Police Department (BPD) is located at 240 North Spring Street in Blythe and its service area covers all land in the City limits, which is approximately 27 square miles. The Riverside County Sheriff’s Department services include traffic control and neighborhood policing, emergency calls, and crime prevention. The Riverside County Sheriff’s Department’s Colorado River Station at 260 North Spring Street in Blythe provides service from the community of Red Cloud to the west to the Arizona state line in the east, Imperial County line to the south, and San Bernardino County line to the north. Communities

included in this service are Desert Center, Eagle Mountain, Blythe, Hayfield, Midland, Nicholls Warm Springs, Ripley, and the Colorado River area. The California Highway Patrol (CHP) is the primary law enforcement agency for state highways and roads. The nearest CHP station to the Project area (Blythe Station 660) is located at 430 S. Broadway in the City of Blythe. Services include law enforcement, traffic control, accident investigation, and the management of hazardous materials spill incidents.

Fire Protection

The Riverside County Fire Department (RCFD)/California Department of Forestry (CAL FIRE) would provide fire protection to the Project site. The Bureau of Land Management California Desert District has responsibility for wildland fire protection in the Project area. The Project area is located within the RCFD's East Desert Division, which encompasses the lower Coachella Valley, east to the Arizona state line. RCFD services include municipal and wildland fire protection and prevention services, pre-hospital emergency medical services including paramedics, hazardous materials response, and technical rescue services. There are two battalions, nine permanently staffed fire stations, and two all-volunteer fire stations. The nearest fire stations are within the jurisdiction of RCFD Battalion 8. These include the Blythe, Ripley, Blythe Air Base, River Bend, and Lake Tamarisk fire stations. The closest station to the Project site area is Ripley Fire Station 44, on 13987 Main Street, approximately five miles away. This station has two firefighters and one certified paramedic. Ripley Fire Station 44 has one Type 1 fire engine and operates 24 hours per day, seven days a week.

The Project area falls within acceptable Total Response Time policy standards for an 'outlying' land use area based on its proximity to the nearest station (Station 45, Blythe Air Base, 17280 W. Hobson Way, Blythe, CA 92225) and that station's ability to meet the seventeen minute and 30 second response time standard. Additionally, the Project site is in close proximity to the City of Blythe Volunteer Fire Department.

Other nearby fire stations are Blythe Air Base Fire Station 45, Blythe Fire Station 43, River Bend Fire Station 46 (volunteer only), and Lake Tamarisk Fire Station 49 in Desert Center. Each of these fire stations has one Type 1 fire engine and provides paramedic services. Each of these fire stations has three personnel (two firefighters and one certified paramedic), with the exception of Lake Tamarisk, which has four personnel (two firefighters and two certified paramedics). The River Bend volunteer station is a reserve volunteer station and does not operate 24 hours per day, seven days a week. This station provides reserve personnel in case of an emergency but does not respond directly to an emergency. All stations are dispatched by CAL FIRE Riverside Unit/RCFD Emergency Command Center under the integrated Fire Protection System. All BLM California Desert District stations are dispatched through the Federal Interagency Communications Center.

Hazardous Materials Emergency Response

The Riverside County Hazardous Materials Management Division under the Department of Environmental Health is the Certified Unified Program Agency/Administering Agency (CUPA), with three participating agencies: Banning Fire Department, Corona Fire Department, and the RCFD. The CUPA Program conducts inspections of businesses that handle hazardous materials, generate hazardous waste, treat hazardous waste, and/or maintain underground storage tanks. RCFD would handle the response to emergency releases of hazardous material or waste for the

Project. The closest RCFD Hazardous Materials Response Team (Station 81) is located at 37995 Washington Street in Palm Desert, California. Station 81 will respond with one Hazardous Materials Response Unit staffed with three personnel and one Hazardous Materials Support Unit staffed with two personnel. One member of the five-person team is a certified paramedic.

Hospital Facilities and Emergency Response

There are several hospitals/medical facilities that provide medical services to the vicinity of the Project area. Table 3.18-2 below provides a summary of the following hospitals that provide medical services in eastern Riverside County, including the Project area. Desert Regional Medical Center is the closest trauma care center to the Project area and the only trauma center in the Coachella Valley. It is a Level II trauma center and provides a full range of specialists and services available 24 hours a day. Palo Verde Hospital provides intensive care services.

The CHP's Border Division Air Operations Unit, located at the Thermal California Station, may respond to a traumatic injury occurring in the Project area that requires medical evacuation via helicopter. However, the CHP usually covers Medevac situations in the area surrounding Palm Springs and rarely in the Blythe area. There are a number of additional Medevac companies that service the Project area. If a serious emergency medical incident were to occur at the solar array field, the paramedic or first responder would call in the emergency. Based on rotation and proximity, a Medevac service would be dispatched to the solar array field for evacuation to Desert Regional Medical Center in Palm Springs. The companies that provide Medevac services to the Project area are Merci Air Service, Reach Helicopter, Care Flight, and the CHP.

Blythe Ambulance, located at 129 South 1st Street in Blythe, also provides emergency medical response services in the Project area. This facility is located approximately seven miles east of the Project area.

Table 3.18-2. Hospitals and Clinics Serving the Project Area

Facility	Approximate Distance from Project Area	Services Provided
Palo Verde Hospital 250 North First Street Blythe, California 92225	7 miles northeast	Hospital, blood bank, computerized tomography scan, intensive care unit, labor/delivery/recovery rooms, magnetic resonance imaging, nuclear medicine, outpatient services, ultrasound.
La Paz Medical Services 150 East Tyson Road Quartzsite, AZ 85359	30 miles east	General medical services and treatments.
John F. Kennedy Memorial Hospital 47111 Monroe Street Indio, CA 92201	85 miles west	Hospital, cardiac and vascular, orthopedics and JFK Bone and Joint Institute, obstetrics, outpatient rehabilitation, women and children, emergency department, emergency and express care.
Desert Regional Medical Center 1150 N. Indian Canyon Drive Palm Springs, CA 92262	105 miles west	Hospital, comprehensive cancer center, inpatient rehabilitation, institute of orthopedics and neurosciences, women and infants center, wound center, hospice, surgery, emergency/trauma services, cardiac/heart care, anesthesiologists, and physical therapists.

3.19 Visual Resources

The natural landscape of the Project area is generally characterized by large expanses of desert and agricultural croplands. The Project area on the Palo Verde Mesa is relatively flat, but the nearby Mule and McCoy Mountains provide scale, variety, interest, and enclosure to the broader landscape. The Mule and McCoy Mountains are recognized by the Palo Verde Valley Area Plan as rugged visual landmarks that accent the area's environment (Riverside County 2015b). Vegetation in the Project area is primarily composed of creosote scrub and open desert. Agricultural land east of the Project area includes a variety of cultivated crops and provides a visual contrast compared to the arid desert west, south and north of the Project area. The Colorado River is located east of the Project area and is considered a substantial recreation and tourist attraction (Riverside County 2015b).

The built environment visible from within the vicinity of the Project includes residences, the Blythe Airport, the Blythe Energy Center, the Modified Blythe Solar Power Project (BSPP), the Colorado River Substation (CRSS), electrical transmission lines, and commercial businesses that are primarily located east, north and south of the Project area. Interstate Highway 10 (I-10), which has status as an Eligible County Scenic Highway, passes north of the Project site in an east-west alignment.

Based on the Project site, viewer groups, the location of public roadways, BLM facilities, and other public vantage points, eight key observation points (KOPs) were chosen in consultation with the BLM. The purpose of the KOPs was to capture representative views of the Project site to be used in visual simulations of the Project, and as an aid in preparing visual contrast ratings of the Project. The locations of the KOPs are shown in Figure 3.19-1; however, the visual characteristics of each viewpoint and the Project-related visual contrast are fully detailed in Section 4.19.

3.19.1 Existing Light and Glare

Based on the relatively undeveloped nature of the surrounding landscape, there are very few sources of light associated with the Project area. The primary source of light and glare in the area is motor vehicles traveling on surrounding roadways and from residences in Nicholls Warm Springs/Mesa Verde. During daytime hours, roadways generate glare from the sun's reflection off cars and paved surfaces. Likewise, at night, vehicle headlights on surrounding roadways generate light and glare. Lighting is also located on the Blythe Energy Center site; at the Blythe Airport to alert aircraft of potential hazards in their flight path; and at Palo Verde College.

3.19.2 Visual Resource Inventory of the Project Area

The visual resource characteristics of the Project area are summarized in the Applicant's Visual Resources Technical Report (URS 2016c), provided as Appendix U.

Sources of Visual Resource Inventory Data

The BLM Palm Springs Field Office recently conducted a large-scale visual resource inventory of BLM-administered lands extending east from Palm Springs to the Arizona border. This inventory is used as the source of baseline data (BLM 2010).

Scenic Quality Rating

The Project area overlaps six Scenic Quality Rating Units (021 (Chuckwalla Valley), 026 (McCoy Mountains), 036 (Blythe Valley), 037 (Palo Verde), 038 (Mule Mountains), and 039 (Little Chuckwalla Mountains)). Four of these units are rated Class B and two (026 (McCoy Mountains) and 037 (Palo Verde)) are rated Class C due to lack of naturalness (BLM 2010).

Visual Sensitivity

The Project site is located in SLRU 49, Bradshaw Trail Backcountry Byway. Visual sensitivity in this SLRU was classified as high, primarily due to presence of the Byway, high OHV use, and importance of maintaining scenic quality to sustain land use objectives of neighboring Wilderness areas, ACECs, and military ranges. There are three SLRU's adjacent to the Project site, two of which (McCoy and Little Chuckwalla Mountains) have visual sensitivity classified as medium and one (Mule Mountains) classified as high visual sensitivity (BLM 2010).

Visibility and Distance Zones

The Project site is located in the foreground-middleground distance zone, indicating visibility of this area from locations within 0 to 5 miles from viewing platforms. Primary viewing platforms include I-10 and SR-78 (BLM 2010).

3.19.3 Interim Visual Resource Management Class Recommendation

As discussed above, currently no VRM Classes are established for lands under BLM jurisdiction within the CDCA Plan area, and VRM classes differ from VRI Classes in that they represent decisions about how the land will be managed in conjunction with resource allocations and management priorities outlined in the applicable RMP. The designation and adoption of Interim VRM classes conducted in support of a specific project is a BLM Field Office Manager decision. The Project site is located in an area designated as VRI Class II, indicating high scenic value. However, the BLM Field Office Manager has assigned a Class III Interim VRM Objective to the Desert Quartzite Solar Project footprint (Dalton 2015).

3.20 Water Resources

A topographic map of the Project site is shown in Figure 2-7. The Project area consists of two distinct types of topography which affect site drainage. The northwestern portion of the Project area, comprising approximately half of the overall Project site, is part of an alluvial fan which slopes in a southeastward direction from the McCoy Mountains, which are located to the northwest. The I-10 highway crosses this alluvial fan in between the mountains and the Project site, so the natural flow of the alluvial fan is interrupted, passes through concentrated channels underneath a highway bridge, and then becomes dispersed again as it continues its route across the alluvial fan between I-10 and the Project site.

The southeastern portion of the site is a flat plateau, part of the Palo Verde Mesa. This area receives drainage from the alluvial fan to the northwest, but also from an alluvial fan system coming from the Mule Mountains to the southwest of the Project area. The ground surface in this area is characterized by a series of depressions in which surface water can pool temporarily. A drainage divide crosses from north to south through the eastern portion of the Project area. The depressions west of this divide drain surface water to the west and southwest, meeting the flow from the Mule Mountains and eventually draining off of the mesa to the southeast, towards the Colorado River. The depressions to the east of this divide drain directly to the east, towards the Colorado River.

The southeastern edge of the Project site is parallel to, and within a few hundred feet of, the sharp break in the slope that forms the boundary between the Palo Verde Mesa and the Palo Verde Valley, which is 80 to 130 feet below the mesa. In this region, the Palo Verde Valley is roughly equivalent to the recent historic floodplain of the Colorado River.

3.20.1 Groundwater

The Project site is located within the Palo Verde Mesa Groundwater Basin (PVMGB, Groundwater Basin Number 7-39), which has a drainage area of approximately 353 square miles. The basin is bounded by the Big Maria and Little Maria Mountains to the north, McCoy Mountains and Mule Mountains to the west, the Palo Verde Mountains to the south, and the Palo Verde Valley Groundwater Basin (PVVGB, Groundwater Basin Number 7-38) to the east. Average annual precipitation in the basin is six inches. Groundwater in the PVMGB is present in alluvial deposits consisting of lenticular beds of sand, gravel, silt, and clay. There are no known barriers to groundwater flow. Recharge is from the percolation of runoff which flows into the basin from the surrounding mountains, irrigation return flow, infiltration from canal seepage, direct precipitation in the basin, and underflow from the adjacent Chuckwalla Valley. Natural recharge is estimated to be 800 AF per year, and underflow from the Chuckwalla Valley is estimated to be 400 AFY. The total groundwater storage capacity is estimated at 6,840,000 AF.

According to groundwater level data acquired to support the analysis of the MSEP, depth-to-groundwater near the Project area ranges from approximately 148 feet below the surface just north of the Blythe Airport, to approximately 83 feet below the surface near the intersection of Hobson Way and Keim Boulevard. Groundwater levels are influenced by seasonal variations, variations in ground surface topography, precipitation, irrigation practices, soil/rock types, groundwater pumping, and other factors and are subject to fluctuations.

Groundwater Balance

The PVMGB is hydrologically continuous with the Palo Verde Valley Groundwater Basin (PVVGB). Therefore, both basins are considered together in support of the water supply assessment, for the purposes of evaluating potential water supply availability. The two basins are collectively referred to as the combined Palo Verde Groundwater Basin (PVGB) throughout the remainder of this section. The Palo Verde groundwater basins occupy 553 square miles. The main source of groundwater recharge in the PVGB is the Colorado River (Dawson and Belitz 2012).

Table 3.20-1 presents the estimated annual groundwater budget for the PVGB, and the following subsections describe the inflow and outflows associated with the basin. The groundwater balance was developed in support of the groundwater impact analysis for the MSEP (BLM 2012b). In support of the DQSP analysis, the Applicant's technical contractor and BLM staff have reviewed the groundwater balance, and concur that it still accurately reflects the groundwater conditions in the PVGB. The balance presented in Table 3.20-1, and the following discussion of the various inflows and outflows, are derived from the MSEP analysis.

Recharge into PVGB

Recharge of groundwater into the PVGB consists of a combination of natural discharge (flooding) of Colorado River surface water recharging into the groundwater, leakage of Colorado River water flowing from the PVID canal system, ground infiltration of Colorado River water and groundwater applied to irrigate crops, percolation of precipitation, subsurface underflow from adjacent groundwater basins, and percolation from the Blythe Wastewater Reclamation Facility.

Of these sources of recharge, the largest is natural discharge of surface water from the Colorado River, accounting for more than half (225,850 AFY) of the total 426,600 AFY of recharge into the PVGB. An estimated 120,000 AFY is returned to the PVGB from leakage from irrigation canals. Both of these sources are located in the PVVGB.

Infiltration of water used to irrigate crops is the next largest component of the recharge to the PVGB. Again, most of this infiltration (67,000 AFY) occurs in the PVVGB area, and a much smaller amount (3,500 AFY) occurs on the PVMGB. Of the infiltration on the PVMGB, approximately 3,600 AFY of groundwater is directly pumped from wells on the mesa for irrigation use on 724 acres of agricultural land. In addition, the PVID pumps surface water uphill from the irrigation canal system in the Palo Verde Valley to irrigate 1,862 acres on the Palo Verde Mesa. The groundwater assessment prepared for the MSEP used estimates of 4.5 to 5.85 AF/ac/year and a crop efficiency of 70 to 75 percent on these combined 2,683 acres on the mesa. Assuming that 25 to 30 percent of the water applied to crops infiltrates and recharges the groundwater basin, an estimated 3,600 AFY recharges the PVMGB from irrigation return flow.

In this area of the Colorado Desert, almost all moisture from rain is lost through evaporation or evapotranspiration and runoff occurs principally during intense thunderstorms. Most recharge from precipitation occurs when runoff from the surrounding mountains exits bedrock canyons and flows across the coarse sediments deposited along the western edge of the PVMGB. In the MSEP analysis, methods to estimate runoff proposed by Hely and Peck (1964) were used to estimate mean annual runoff and infiltration in the PVMGB. From the estimated total runoff for the PVMGB, an estimate of five percent of the estimated total volume of rainwater from mean annual precipitation was used to generate an estimate of total annual infiltration volume (AF) for the basins. This analysis estimated 5,000 AFY of groundwater recharge from precipitation.

Underflow from adjacent groundwater basins contributes approximately one percent of the overall recharge of groundwater in the PVGB. Subsurface inflow from the CVGB eastward into the PVMGB is estimated to be 1,000 AFY, and subsurface inflow into the PVGB from the Parker Valley Groundwater Basin on the east is estimated to be 3,500 AFY.

The smallest contributor to groundwater recharge in the PVGB is percolation of an estimated 750 AFY from the percolation-evaporation ponds at the Blythe Regional Water Reclamation Facility.

Table 3.20-1. Estimated Annual Groundwater Budget in the PVGB

Budget Components	Budget (AFY)
Recharge (Inflow)	
Underflow from Chuckwalla Valley Groundwater Basin	1,000
Underflow from Parker Valley Groundwater Basin	3,500
Agricultural Return to PVMGB	3,500
Agricultural Return to PVVGB	67,000
Percolation from Blythe Wastewater Reclamation Facility	750
Percolation from Mountain Front Precipitation into PVMGB	5,000
PVVGB Irrigation Canal Leakage (less evaporation)	120,000
River Discharge to PVVGB Groundwater (Losing Condition)	225,850
Bedrock	0
Total Inflow	426,600
Discharge (Outflow)	
Underflow out of the PVGB	0
Groundwater Pumping for Agriculture from PVMGB	3,600
Groundwater Pumping for Municipal and Domestic Use from PVGB	7,500
Groundwater Discharge to Colorado River (Gaining) from PVVGB	50,000
Consumptive Use – Native Vegetation	8,500
Groundwater Discharge from PVVGB to VID Drains	357,000
Total Outflow	426,600
Budget Balance (Inflow-Outflow)	0

Source: URS 2016d

Outflow from PVGB

The largest component of outflow of groundwater from the PVGB is discharge to the PVID drains, which return the water to the Colorado River. The drains comprise approximately 83.7 percent (357,000 AFY) of the total 426,600 AFY outflow from the PVGB. An additional 50,000 AFY (another 11.7 percent) is returned from the groundwater to the river through groundwater discharge in gaining sections of the river. The remaining 19,600 AFY (or approximately 4.6 percent) is pumped for use in agriculture (3,600 AFY), for municipal or domestic use (7,500 AFY), or lost through evapotranspiration by native riparian vegetation (8,500 AFY).

Groundwater Quality

As discussed in Section 3.9.1.1, the Phase I Environmental Site Assessment (ESA) identified two suspected groundwater supply wells on BLM land, which were observed to be open and unsecured. A third well, covered only by a sheet-metal plate, was found on the private land parcel. Unsecured wells can act as conduits for surface-based contamination or wastes to enter groundwater aquifers. The Applicant conducted a limited Phase II Environmental Site Assessment, which included collection and analysis of a grab sample from the well on the private land parcel. That assessment did not identify any water quality impacts to that well. However, there have been no subsequent response actions for the wells on BLM land, including securing of the groundwater wells or sampling of environmental media, to verify whether site contamination currently exists.

Groundwater Wells

Over 580 water supply wells were identified in online databases in the PVMGB (AECOM 2011). A field survey of wells in the Project vicinity conducted by AECOM (2009) encountered no active water supply wells. Nine out of 13 wells within one mile of the site were found to be accessible. All of these wells had been used for irrigation supply, but because no sources of electrical power for pumps (i.e., power lines and generators) were observed at any of these wells, these nine wells were presumed to be inactive. The remaining four wells were reported to be not accessible, and therefore their status could not be determined (AECOM 2009). Available information for water supply wells located in the area is summarized in Table 3.20-2. Water level data were updated by AECOM (2011) to include 2010 data. Only two wells indicated new data available during this period.

Table 3.20-2. Characteristics of Nearby Wells in the PVMGB

State Well Number	Surface Elevation (ft amsl)	Total Depth (ft bgs)	Distance from Proposed Production Well (feet)	Specific Capacity (gpm/ft)
6/21E-25L01	400.2	--	25,000	--
6/22E-08J01	408	302	135,000	35.56-64.80
6/22E-17B01	399.64	302	135,000	25.00-30.60
6/22E-17L01	400	445	15,000	37.88-54.90
6/22E-17L02	397	323	15,500	42.73-56.90
6/22E-18A01	406.88	298	13,000	30.19-35.14
6/22E-18J01	408	302	14,000	32.43-34.62
6/22E-19N02	397	300	20,000	--
6/22E-19N03	397.2	394	20,000	--
6/22E-19R01	395.6	300	21,000	--

Source: Derived from AECOM 2009; AECOM 2011, as cited in BLM 2012b.

3.20.2 Surface Water Hydrology and Water Quality

Surface Water Flow

The surface water flow conditions of the Project area are described in the Applicant's Drainage Report (TLA Engineering and Planning 2011), provided as Appendix V. The dominant surface

water feature in the region is the Colorado River, which is located approximately 11 miles to the east of the Project site. No perennial water bodies are located on the Project site itself.

A topographic map of the Project area is shown in Figure 2-7, and a more detailed view of the Project site is shown in Figure 2-8. The Project area consists of two distinct types of topography which affect site drainage. The northwestern portion of the Project area, comprising approximately half of the overall Project site, is part of an alluvial fan which slopes in a southeastward direction from the McCoy Mountains, which are located to the northwest. This drainage area is 3,343 acres in size, and ranges in elevation from 1670 feet at the northwest corner to 470 feet at its southwest corner, at the I-10 bridge crossing. The I-10 highway crosses this alluvial fan in between the mountains and the Project site, so the natural flow of the alluvial fan is interrupted, passes through concentrated channels underneath a highway bridge, and then becomes dispersed again as it continues its route across the alluvial fan between I-10 and the Project site. The southeastern portion of the site is a flat plateau, part of the Palo Verde Mesa. This source of drainage for this area is the Mule Mountains, which drain into the alluvial fan area west of the Project site.

In general, surface water on the Palo Verde Mesa is limited to ephemeral and intermittent drainages leading to the Colorado River. The Mesa is topographically higher than the Palo Verde Valley to the east, which forms the 100-year floodplain of the Colorado River. Lands in this area that are not utilized for agriculture are crossed by a number of small ephemeral drainages, generally flowing from northwest to southeast toward the Colorado River, either dissipating prior to reaching the edge of the Mesa or flowing into the Palo Verde Valley. In areas used for agriculture, flow may be diverted by earthen berms or irrigation ditches. The Palo Verde Mesa receives drainage from the alluvial fan to the northwest, but also from an alluvial fan system coming from the Mule Mountains to the southwest of the Project area. The ground surface in this area is characterized by a series of depressions in which surface water can pool. A drainage divide crosses from north to south through the eastern portion of the Project area. The depressions west of this divide drain surface water to the west and southwest, meeting the flow from the Mule Mountains and eventually draining off of the mesa to the southeast, towards the Colorado River. The depressions to the east of this divide drain directly to the east, towards the Colorado River.

The total drainage area of the alluvial fan consists of 14,847 offsite acres and 5,310 Project onsite acres for a total of 20,157 acres. The study area ranges in elevation from the 525 feet at its highest to a lowest elevation of 320-feet near the southeast side of the Project area. The straight line length between these elevations is approximately 6.92-miles and yields a slope of 0.0056 feet/foot.

The Applicant evaluated existing stormwater flows on the Project site, using the primary drainage criteria and methods following the Riverside County Hydrology Manual. The Applicant used U.S. Army Corps of Engineers HEC-1 modeling software to determine the mountain shed runoff hydrographs, and FLO-2D modeling software to determine the alluvial fan rainfall, flow depths, velocities, and sediment transport. Current stormwater flows have relatively shallow depths and low velocities due to the flat terrain. The majority of the Project site experiences flow depths less than six inches, and flow velocities less than half a foot per second.

Jurisdictional Waters

During large storm events, the ephemeral streams and washes in the Project area flow southeast across the Mesa and into the canal and drain system of the Palo Verde Valley. From this system, stormwater eventually flows into the Colorado River, which is a Traditional Navigable Water of

the United States. Intermittent tributaries that drain into the Colorado River are likewise considered Waters of the United States, as defined in Section 404 CWA.

The Applicant conducted a delineation of wetlands and other waters at the Project site in 2014. The delineation consisted of field reconnaissance, as well as review of maps, aerial photographs, and soil resources reports. No areas were found which met the technical criteria for wetlands. Physical characteristics of water flow, including water marks, sediment deposits, drift deposits, and a distinctive border between vegetated and unvegetated areas were identified, and were considered potentially jurisdictional waters. Mapping indicated the presence of approximately 40,000 linear feet of ephemeral riverine intermittent streambed, and 1,500 linear feet of excavated ephemeral riverine intermittent streambed. These streambeds were not identified as navigable waters, and are not used to transport interstate or foreign commerce. In addition, the streambeds were also found to lack a surface hydrologic connection to a Traditional Navigable Water, and do not meet the requirements for jurisdictional isolated waters (Huffman-Broadway 2017). The results of the delineation were submitted to the U.S. Army Corps of Engineers, which determined that the Project area does not contain waters of the United States in a letter on February 18, 2016. The letter is attached to the Federal Jurisdictional Delineation provided in Appendix I.

Landscape features that potentially meet the definition of stream in 14 CCR Section 1.72 were identified, and may be jurisdictional streams under the jurisdiction of the California Department of Fish and Wildlife (CDFW). The areas which may be subject to CDFW jurisdiction are presented in Table 3.3-4. The results of the delineation, when finalized for the chosen alternative, will be submitted to CDFW for review.

Surface Water Quality

The current Section 303(d) List of Impaired Waters is the 2014-2016 list, which was approved by the United States Environmental Protection Agency (USEPA) on June 6, 2017. Within the Project region, the only water body listed as impaired is the Palo Verde Outfall Drain and Lagoon. This feature, which is 18 miles long and located approximately 5 miles southeast and downstream of the Project site, is listed as impaired by chloride, dichlorodiphenyltrichloroethane (DDT), Indicator Bacteria, and toxaphene, all from unknown sources (SWRCB 2018).

3.21 Wildland Fire Ecology

The study area for Wildland Fire Ecology constitutes an area approximately one mile larger than the periphery of the Project site boundary, capturing the greatest extent of any likely wildfires near the Project. Fire risk in the study area is low, with most fires in the NECO Plan area caused by lightning or vehicles (BLM 2002).

The potential for wildfire on the Project site is limited, due to the sparse vegetation. The locations of fire ignitions near the Project area between 1990 and 2016 are shown in Figure 3.21-1. This map shows that 21 out of the 31 ignitions since 1990 occurred along Interstate 10, and 6 others occurred along publicly accessible rural roads or near private/BLM land boundaries. This suggests that most ignitions are associated with motorized vehicle use. There are no reports of fires having previously occurred on the Project site.

The Project site has not been the location of grazing, substantial OHV use, or development, so is not expected to present a substantial risk of fire. Plant inventories have not detected red brome at the Project site.

The Project area is located in a Federal responsibility area (FRA) under the jurisdiction of BLM, with the exception of the 160 acre private land parcel, which is in a local responsibility area (LRA) under the jurisdiction of the RCFD. The BLM would be first responder for wildland fires and the County for structures. Both the FRA and LRA portions of the Project area are designated as within a moderate FHSZ (CAL FIRE 2016).

CHAPTER 4 ENVIRONMENTAL CONSEQUENCES

4.1 Introduction

The impact assessment that follows focuses on the general impacts that could occur as a result of implementing each of the alternatives. The methodology for this assessment conforms to the guidance found in the following sections of the CEQ regulations for implementing NEPA: 40 CFR §1502.24, *Methodology and Scientific Accuracy*; 40 CFR §1508.7, *Cumulative Impact*; and 40 CFR §1508.8, *Effects*. The CEQ regulations require agencies to “rigorously explore and objectively evaluate” the impacts of the alternatives. This chapter discusses short- and long-term direct, indirect, and cumulative impacts of the Proposed Action and alternatives relative to baseline conditions using established significance criteria for each environmental resource area; identifies mitigation measures to avoid or reduce the intensity of significant and potentially significant impacts (below established thresholds where possible); and summarizes on an issue-by-issue basis the residual impacts that would remain after mitigation measures are incorporated.

Under CEQA, impacts are evaluated using significance thresholds, as listed in the Appendix G checklist of CEQA. For purposes of performing a CEQA-compliant analysis, the potential impacts are classified as:

- *Significant and unavoidable*: cannot be mitigated to a level that is less than significant
- *Less than significant with mitigation incorporated*: can be mitigated to a level that is less than significant
- *Less than significant*: no mitigation required
- *No impact*: no effect identified

In November, 2018, an update to the Appendix G checklist was approved. These modifications included wording changes, as well as addition and deletion of specific impact issues. Because these changes occurred after the publication of the Draft PA/EIS/EIR for the DQSP, there is no requirement to re-perform the original analysis. However, the changes have been reviewed by the County within the context of the DQSP PA/EIS/EIR, in order to ensure that they would not result in changes to any significance determinations. In general, the wording changes for most issues would not affect any significance determinations. The only impact issue that was changed, and which is relevant to the significance determinations made in the Draft PA/EIS/EIR, was:

AIR-2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation when added to the local background.

In the revised guidelines, this impact issue was removed, and a significance determination is no longer required. As discussed on Section 4.2.4 below, the Draft PA/EIS/EIR concluded that the impacts of the Project would have temporary significant and unavoidable impacts with respect to AIR-2 during construction. Regardless of the inclusion or exclusion of AIR-2 as a requirement, analysis of the contribution of the Project to air quality violations, and identification of any feasible mitigation to reduce this contribution, is still warranted. Therefore, the analysis of this issue in the Final PA/EIS/EIR has not been changed from that of the Draft PA/EIS/EIR.

Although NEPA allows the lead agency to approve an action regardless of whether it will have significant and unavoidable impacts, CEQA requires that a lead agency make specific findings in a statement of overriding considerations before approving a project with impacts that cannot be mitigated to a level that is less than significant. The significant and unavoidable impacts of the Project are discussed in Section 5.2 of this Final PA/EIS/EIR.

4.1.1 Baseline

The baseline for purposes of this Final PA/EIS/EIR is the affected environment described in Sections 3.2 through 3.21, which generally reflect conditions as they existed on or about March 6, 2015, when the BLM published a NOI announcing its intention to prepare a Draft PA/EIS, and March 15, 2015, when the County published a NOP announcing its intention to prepare a Draft EIR. The baseline is intended to reflect the pre-Project environmental conditions to which the potential impacts of the Proposed Action (Project) and alternatives are compared in Sections 4.2 through 4.21.

4.1.2 Analytical Assumptions

The impacts analyses contained within this chapter were conducted using the following assumptions:

1. The laws, regulations, and policies applicable to BLM authorizing ROW grants for renewable energy development facilities would be applied consistently for all action alternatives.
2. The proposed facility would be constructed, operated, maintained, and decommissioned as described in each action alternative including the implementation of APMs (see Section 2.3.7).
3. Short-term impacts are those expected to occur during the construction phase and the first years of the operation and maintenance. Long-term impacts are those that would occur after the first five years of operation.

4.1.3 Types of Effects

The potential impacts from those actions that would have direct, indirect, and cumulative effects were considered for each resource. The terms “effects” and “impacts” as used in this document are synonymous and could be beneficial or detrimental.

4.1.4 Resources and Uses Not Affected or Present in the Action Area

The resources, BLM program areas, or other aspects of the human environment that were determined by the BLM as not affected or not present in the Project area include: wild and scenic rivers; national scenic or historic trails, monuments, recreation areas, or conservation areas; cooperative management and protection areas; outstanding natural areas; forest reserves; wetlands; livestock grazing; and wild horses and burros.

4.1.5 Cumulative Scenario Approach

Under NEPA, cumulative effects are defined as the impact on the environment that results from the incremental impact of the Proposed Action or an alternative when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions (40 CFR § 1508.7). Similarly under CEQA, CEQA defines a cumulative effect as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (14 CCR § 15355). This Final PA/EIS/EIR analyzes the cumulative effects of the construction, operation and maintenance, closure, and decommissioning of the Project within the ROW grant application area and all other elements of the Proposed Action, taking into account the effects of other past, present, and reasonably foreseeable future actions. The cumulative effects analysis considers past actions that are related either in time or space (i.e., temporally or in geographic proximity) to the proposed action; present actions that are ongoing at the same time the Final PA/EIS/EIR was being prepared; and reasonably foreseeable future actions, limited to those for which there are existing decisions, funding, formal proposals, or which are highly probable, based on known opportunities or trends.

Varying degrees of information exist about projects within the cumulative scenario. Therefore, for resource areas for which quantitative information is available, a quantitative analysis is provided; however, if said level of detail is not available, a qualitative analysis is provided. Because cumulative effects are defined as the incremental impact of a Proposed Action or an alternative, the Final PA/EIS/EIR does not analyze potential cumulative effects on a resource if the Proposed Action or alternatives would have no direct or indirect effects on that resource. See, for example, Section 4.1.4, *Resources and Uses Not Affected or Present in the Action Area*.

The cumulative scenario includes projects identified in Table 4.1-1. Table 4.1-1 identifies each resource or BLM program, the cumulative analysis impacts area (which is the geographic scope for each cumulative effects issue), issues to consider (as limited by the timeframes within which the Project could cause an effect), and which renewable projects and other known actions or activities are located or would occur within the cumulative analysis impacts area. Tables 4.1-1 and 4.1-2 identify existing and reasonably foreseeable future projects within the geographic scope of the cumulative analysis. These projects are shown in Figure 4.1-1.

4.1.5.1 NEPA Requirements for Cumulative Impact Analysis

The approach to the cumulative effects analysis follows the principles outlined in the CEQ’s *Considering Cumulative Impacts* (1997), which are listed below.

1. Cumulative effects are caused by the aggregate of past, present, and reasonably foreseeable future actions.
2. Cumulative effects are the total effect, including both direct and indirect effects, on a given resource, ecosystem, and human community of all actions taken, no matter who (Federal, non-Federal, or private) has taken the action.
3. Cumulative effects need to be analyzed in terms of the specific resource, ecosystem, and human community being affected.
4. It is not practical to analyze the cumulative effects of an action on the universe; the list of environmental effects must focus on those that are truly meaningful.

5. Cumulative effects on a given resource, ecosystem, and human community are rarely aligned with political or administrative boundaries.
6. Cumulative effects may result from the accumulation of similar effects or the synergistic interaction of different effects.
7. Cumulative effects may last for many years beyond the life of the action that caused the effects.
8. Each affected resource, ecosystem, and human community must be analyzed in terms of its capacity to accommodate additional effects, based on its own time and space parameters.

Where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

The BLM NEPA Handbook outlines the following elements to be considered for each cumulative effect issue:

- Describe the existing condition. The existing condition is the combination of the natural condition and the effects of past actions. The natural condition is the naturally occurring resource condition without the effects of human actions. Detailed description of the natural condition may not be possible for some resources because of incomplete or unavailable information or may not be applicable for some resources. Describe the effects of past actions, either individually or collectively, to understand how the existing condition has been created.
- Describe the effects of other present actions.
- Describe the effects of reasonably foreseeable actions.
- Describe the effects of the proposed action and each action alternative.
- Describe the interaction among the above effects.
- Describe the relationship of the cumulative effects to any thresholds.

4.1.5.2 CEQA Requirements for Cumulative Impact Analysis

CEQA requires that an EIR contain an assessment of the cumulative impacts that could be associated with the proposed Project. According to state CEQA Guidelines Section 15130(a), “an EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (as defined by Section 15130). As defined in state CEQA Guidelines Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. A cumulative impact occurs from:

... the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

In addition, state CEQA Guidelines Section 15130(b) identifies that the following three elements are necessary for an adequate cumulative analysis:

- 1) Either:
 - a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
 - a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.
- 2) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available;
- 3) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

Cumulative Impact Approach

This Final PA/EIS/EIR evaluates cumulative impacts of the proposed Project and alternatives for each resource area, using the following steps:

1. Define the geographic and temporal scope of cumulative impact analysis for each discipline, based on the potential area within which impacts of the proposed Project could combine with those of other projects to result in significant cumulative impacts.
2. Evaluate the effects of the proposed Project in combination with past and present (existing) projects in the study area.
3. Evaluate the effects of the proposed Project with foreseeable future projects that occur within the area of geographic effect defined for each discipline.

The specific area for cumulative effect differs according to the resource under consideration. For each resource, the geographic scope of analysis in the Final PA/EIS/EIR is based on the natural boundaries and physical conditions relevant to the resource affected, rather than jurisdictional boundaries. The geographic scope of cumulative effects often extends beyond the scope of the direct effects, but not beyond the scope of the direct and indirect effects of the Proposed Action and alternatives. Table 4.1-1 identifies the relevant geographic scope for each resource's analysis of cumulative impacts.

In addition, each project in a region would have its own implementation schedule, which may or may not coincide or overlap with the Proposed Action's schedule. This can impact the conclusions related to short-term impacts from activities such as construction of the Project. To be conservative, the cumulative analysis assumes that all projects in the cumulative scenario are built and operating during the operating lifetime of the Project.

4.1.5.3 Known Actions and Activities in the Cumulative Scenario

Existing actions and activities within the cumulative impact analysis area (including existing BLM-authorized actions) are identified in Table 4.1-2. Reasonably foreseeable future projects within the cumulative impact analysis area are identified in Table 4.1-3.

4.1.5.4 Renewable Energy Projects Included in the Cumulative Scenario

A large number of renewable projects have been proposed on BLM-managed land, state land, and private land in California. As of April, 2016, there were 47 renewable projects approved, or in various stages of the environmental review process or under construction, in California. Solar, wind, and geothermal development applications have requested use of BLM land, including approximately one million acres of the California desert. State and private lands have also been targeted for renewable energy projects.

Table 4.1-1. Cumulative Scenario

Resource Or BLM Program	Cumulative Analysis Impact Area	Issues To Consider	BLM Renewable Energy Projects	Other Known Actions And Activities
Air Resources	MDAB	PM _{2.5} , PM ₁₀ , ozone	All projects	All projects
Biological Resources - Wildlife	Recovery Plan Area defined by NECO; Critical Habitat Unit defined by USFWS/CDFW; existing range or eastern Riverside County	Species include Mojave desert tortoise, Mojave fringe-toed lizard, migratory birds, golden eagle, western burrowing owl, American badger, kit fox, Desert big horn sheep. Impacts include mortality and injury; special status wildlife; wildlife movement; and indirect impacts, including from lighting, collisions, climate change, and stressors and potential changes to sand dune systems.	All projects	All California projects
Biological Resources – Vegetation	NECO Plan area	Ephemerally flowing drainages and natural communities; special status plants including plants protected under the California Desert Native Plants Act; microphyll woodlands; sand dunes; spread of invasive plants; mortality of plants, loss of forage and cover; changes to the vegetation alliances	All projects	All California projects
Cultural Resources	Cultural sites, traditional use areas, and cultural landscapes on the plant site, along the linear facilities corridor and in the APE.	Ground-disturbing activities and the adverse effects on historic properties, as discussed in 36CFR800.5[a][2]). Cultural resources, including archaeological (prehistoric and historic), and ethnographic resources.	All projects	All projects

Table 4.1-1. Cumulative Scenario

Resource Or BLM Program	Cumulative Analysis Impact Area	Issues To Consider	BLM Renewable Energy Projects	Other Known Actions And Activities
Geology and Soils	Project site and its linear facilities corridor for geologic hazards. Watershed for soil erosion impacts.	Accelerated and/or environmentally harmful soil erosion from water and wind; and land subsidence.	RE Crimson Solar Project, MSEP, Modified BSPP	NRG Blythe PV Project, BMSP, Interstate 10, DPV1, West-wide Section 368 Energy Corridor, DPV2, CRSS, Desert Southwest Transmission Line, and Ten West Link Transmission Line.
Greenhouse Gases and Climate Change	International, national, and regional	Emission of CO ₂ e, climate change impacts on Project.	All projects	All projects
Hazards and Hazardous Materials	One mile radius of Project site for hazardous materials impacts and the Blythe Airport Influence Area for aircraft safety hazards.	Releases, spills, emissions, bacteria; airborne fungi (valley fever); ground disturbance that exposes existing subsurface conditions; engineering and administrative controls; health risks from dust; Site access; fire response; hazardous materials response; advanced life support/paramedic services; disaster preparedness; removal and disposal of PV panels containing hazardous semiconductor materials (e.g., CdTe) during operation or decommissioning.	RE Crimson Solar Project, MSEP, Modified BSPP	NRG Blythe PV Project, BMSP, DPV1, West-wide Section 368 Energy Corridor, DPV2, CRSS, Desert Southwest Transmission Line, and Ten West Link Transmission Line.
Lands and Realty	Project site and linear facilities corridor; CDCA Plan areas bearing the multiple use class designation "Moderate"	Designated utility corridors (e.g., transmission lines, cellular telephone towers, poles), existing ROWs, I-10; restriction or preclusion of otherwise allowable use opportunities	Palen Solar Project, Genesis Solar Energy Project, Desert Sunlight, Desert Harvest Project, RE Crimson Solar Project	Desert Southwest Transmission Line Project; Eagle Mountain Landfill Project, and Ten West Link Transmission Line.
Mineral Resources	All areas potentially underlain by construction-grade aggregate resources	Designated aggregate resource areas, extent and availability of aggregate.	All projects	All projects

Table 4.1-1. Cumulative Scenario

Resource Or BLM Program	Cumulative Analysis Impact Area	Issues To Consider	BLM Renewable Energy Projects	Other Known Actions And Activities
Noise	Areas within 0.5 mile of the Project	Equipment, motor vehicles	RE Crimson Solar Project	NRG Blythe PV Project, BMSP, CRSS, and CUP03602, Ten West Link Transmission Line, vehicles on nearby roads.
Paleontological Resources	Quaternary-age Geologic units within eastern Riverside County	Ground-disturbing activities; rock units with potentially high sensitivity or known paleontological resources	All projects	All projects with ground disturbance
Recreation and Public Access	NECO Plan area, LTVAs, Lands with Wilderness Characteristics, OHV Routes, recreational areas within viewing or hearing distance	Dispersed recreational opportunities and experiences, LTVAs, lands with wilderness characteristics, OHV recreation opportunities, unauthorized routes	Modified BSPP, RE Crimson Solar Project, MSEP	NRG Blythe PV Project, BMSP, Desert Southwest Transmission Line Project, Eagle Mountain Landfill Project, Blythe Airport Solar Project, CRSS, CUP03602, and Ten West Link Transmission Line.
Social and Economic Setting	Social: eastern Riverside County and adjacent parts of La Paz County. Economic: Riverside County	Flow of goods and services; impacts to local infrastructure and services; ability to meet housing demand; employment/labor demand; possible positive impacts to regional economic sectors and/or adverse community impacts; severance or other tax benefits; ability of communities to absorb impacts.	Palen Solar Project, Genesis Solar Energy Project, Desert Sunlight, Desert Harvest Project, Palo Verde, RE Crimson Solar Project, MSEP, Modified BSPP	NRG Blythe PV Project, BMSP, DPV2 Transmission Line Project, CRSS, Desert Southwest Transmission Line, CUP03602, Palo Verde Mesa Solar Project, and Ten West Link Transmission Line.
Special Designations	California Desert, with emphasis on Riverside County	Land with wilderness characteristics	MSEP	None

Table 4.1-1. Cumulative Scenario

Resource Or BLM Program	Cumulative Analysis Impact Area	Issues To Consider	BLM Renewable Energy Projects	Other Known Actions And Activities
Transportation and Traffic	Roadways which may be impacted by the Project, including local roadways and the I-10 corridor in eastern Riverside County and adjacent parts of La Paz County.	Construction traffic – materials and workers	All projects	All projects
Utilities and Service Systems	California Desert, with emphasis on Riverside County	Solid and liquid wastes	All projects	All projects
Visual Resources	Locations from which the Project may be visible, including the I-10 corridor.	Project appearance/visual contrast; construction- related dust, light, glint and glare; views from key observation points	RE Crimson Solar Project, MSEP, Modified BSPP	NRG Blythe PV Project, BMSP, Blythe Airport Solar Project, CRSS, CUP03602, and Ten West Link Transmission Line.
Surface Water	Watershed	Hydrology and water quality, potential surface pollutants (e.g., petroleum derivatives, soil stabilizers), groundwater pumping from wells supplying water to the Project.	RE Crimson Solar Project, MSEP, Modified BSPP	NRG Blythe PV Project, BMSP, Blythe Energy Project Transmission Line, City of Blythe projects, Blythe Airport Solar I Project, DPV2, CRSS, Desert Southwest Transmission Line, Eagle Mountain Landfill Project, RCL00161R1, BGR100258, CUP03602, Palo Verde Mesa Solar Project, and Ten West Link Transmission Line.

Table 4.1-1. Cumulative Scenario

Resource Or BLM Program	Cumulative Analysis Impact Area	Issues To Consider	BLM Renewable Energy Projects	Other Known Actions And Activities
Groundwater	PVMGB	Basin balance, groundwater availability, and water quality (e.g., salinity from Colorado River percolation during soil stabilization and PV panel cleaning; possibly perchlorate, nitrate in soils affected by human disturbance creating increased percolation from water applications at the surface into soil and groundwater).	RE Crimson Solar Project, MSEP, Modified BSPP	NRG Blythe PV Project
Wildland Fire Ecology	eastern Riverside County	Mortality of plants and wildlife, loss of forage and cover; changes to the vegetation alliances; spread of invasive plants; consequences of extreme weather events	All projects	NRG Blythe PV Project, BMSP, West-wide Section 368 Energy Corridors, Eagle Mountain Pumping Plant, Recreational Opportunities, Kaiser Mine, Blythe Energy Project Transmission Line, Blythe Airport Solar 1, Chuckwalla Valley Raceway, Interstate 10, Chuckwalla Valley State Prison, Ironwood State Prison, DPV1 Transmission Line, Blythe Energy Project II, DPV2 Transmission Line Project, CRSS, Desert Southwest Transmission Line, Eagle Mountain Landfill Project, and Ten West Link Transmission Line.
Transmission Line Safety and Nuisance	Immediate vicinity of the proposed gen-tie line	Interference with radio-frequency communication; noise; fire hazards; hazardous shocks; nuisance shocks; and EMF exposure	All projects	DPV1 Transmission Line, Blythe Energy Project Transmission Line, DPV2 Transmission Line, and Desert Southwest Transmission Line, and Ten West Link Transmission Line.

Table 4.1-1. Cumulative Scenario

Resource Or BLM Program	Cumulative Analysis Impact Area	Issues To Consider	BLM Renewable Energy Projects	Other Known Actions And Activities
Aviation Safety	Air space governed by the Blythe ALUCP	Navigable airspace; reflectivity and temporary flash occurrences; radio frequency emissions and potential interference; thermal plumes; height and location of structures; clear space within Compatibility Zone D; bird strike and avian-aviation incompatibilities	Modified BSPP, RE Crimson Solar Project, MSEP	Blythe Airport Solar 1, NRG Blythe PV Project, BMSP, Blythe Energy Project Transmission Line, DPV1 Transmission Line, Desert Southwest Transmission Line, Palo Verde Mesa Solar Project, and Ten West Link Transmission Line.

Table 4.1-2. Existing Projects Within the Cumulative Impact Analysis Area

ID#	Project Name; Agency ID	Location	Ownership	Status	Acres	Project Description
1	Interstate 10	Linear project running from Santa Monica, through Blythe, and into Arizona	Caltrans	Existing	N/A	I-10 is a major east-west route for trucks delivering goods to and from California. It is a four lane divided highway in the Blythe region.
2	Chuckawalla Valley State Prison	19025 Wiley's Well Rd. Blythe, CA	CA Dept. of Corrections and Rehabilitation	Existing	1,080	State prison providing long-term housing and services for male felons classified as medium and low-medium custody inmates jointly located on 1,720 acres of state-owned property. Assessor's Parcel Numbers (APNs) 879040006, 008, 012, 027, 028, 029, 030
3	Ironwood State Prison	19005 Wiley's Well Rd. Blythe, CA	CA Dept. of Corrections and Rehabilitation	Existing	640	ISP jointly occupies with Chuckawalla Valley State Prison 1,720 acres of state-owned property, of which ISP encompasses 640 acres. The prison complex occupies approximately 350 acres with the remaining acreage used for erosion control, drainage ditches, and catch basins. APNs 879040001, 004, 009, 010, 011, 015, 016, 017, 018, 019, 020
4	Devers-Palo Verde 1 Transmission Line	From Palo Verde in Arizona to Devers Substation, San Bernardino County	Southern California Edison	Existing	N/A	Existing 500 kV transmission line parallel to I-10 from Arizona to the SCE Devers Substation, near Palm Springs.
5	West-wide Section 368 Energy Corridors	Coincident with Corridor K, along northern boundary of Project	BLM, DOE, U.S. Forest Service	Approved by BLM and U.S. Forest Service	N/A	Designation of corridors on Federal land in the 11 western states, including California, for oil, gas, and hydrogen pipelines and electricity transmission and distribution facilities (energy corridors). Corridor 30-52 passes east-west across the northern boundary of the Project site.
6	Eagle Mountain Pumping Plant	Eagle Mountain Road, west of Desert Center	Metropolitan Water District of Southern California	Existing		438 ft. lift pumping plant that is part of the Metropolitan Water District of Southern California's facilities. APNs 807150007, 807150009, 807150010

Table 4.1-2. Existing Projects Within the Cumulative Impact Analysis Area

ID#	Project Name; Agency ID	Location	Ownership	Status	Acres	Project Description
7	Recreational Opportunities	eastern Riverside County and adjacent parts of La Paz County	BLM	Existing	N/A	BLM has numerous recreational opportunities on lands in eastern Riverside County along the I-10 corridor including the Wiley's Well Campground, Coon Hollow Campground, and multiple LTVAs.
8	Kaiser Mine	Eagle Mountain, north of Desert Center	Kaiser Ventures, Inc.	Existing		Kaiser Steel mined iron ore at Kaiser Mine in Eagle Mountain and provided much of the Pacific Coast steel in the 1950s. Mining project also included the Eagle Mountain Railroad, 51 miles long. Imported steel captured market share in the 1960s and 1970s and primary steelmaking closed in the 1980s. APN 701380031
9	Blythe Energy Project Transmission Line; 99-AFC-8C	From the Blythe Energy Project (Blythe, CA) to Julian Hinds Substation	Blythe Energy, LLC	Existing	N/A	Transmission line modifications including upgrades to Buck Substation, approximately 67.4 miles of new 230 kV transmission line between Buck Substation and Julian Hinds Substation, upgrades to the Julian Hinds Substation, installation of 6.7 miles of new 230 kV transmission line between Buck Substation and SCE's DPV 500 kV transmission line.
10	NRG Blythe PV Project	Blythe	First Solar	CPUC approved project terms of a 20 year power purchase agreement for sale of 7.5 MW, Began operations in December 2009	200	21 MW solar photovoltaic project located on 200 acres. Project was constructed by First Solar and sold to NRG Energy.
11	Chuckwalla Valley Raceway	Desert Center Airport (no longer a community airport)	Developer Matt Johnson	Existing	400	Proposed 500-mile race track located on 400 acres of land that used to belong to Riverside County and was used as the Desert Center Airport. APNs 811-142-016, 811-142-006. Small private airstrip kept as part of project. Construction completed in March 2010.

Table 4.1-2. Existing Projects Within the Cumulative Impact Analysis Area

ID#	Project Name; Agency ID	Location	Ownership	Status	Acres	Project Description
12	Devers-Palo Verde 2 Transmission Line Project; CPUC Application No. A.05-04-015; CACA-048771	From the Midpoint Substation to Devers Substation (CA-only portion)	Southern California Edison	Existing	N/A	500 kV transmission line 115 miles long from the CRSS to Devers, and 41.6 miles long between the Devers Substation and SCE's Valley Substation.
13	Colorado River Substation Expansion; CPUC Application No. A.05-05-015	10 miles southwest of Blythe	Southern California Edison	Existing	90	500/230 kV substation constructed in an area approximately 1,000 feet by 1,900 feet.
14	Genesis Solar Energy Project; CACA-48880	North of I-10, 25 miles west of Blythe and 27 miles east of Desert Center	NextEra (FPL)	Existing	1,950	250 MW (two adjacent, independent solar plants with a 125 MW capacity each) solar thermal electric generating facility, using solar parabolic trough technology; includes 6-mile natural gas pipeline and 5.5-mile transmission line interconnecting Blythe Energy Center to Julian Hinds Transmission Line; on 1,950 acres. Construction completed in April, 2014.
15	Desert Sunlight; CACA-48649	North of Desert Center	Desert Sunlight Holdings, LLC	Existing	4,245	550 MW solar photovoltaic project located on 4,245 acres.
16	Red Bluff Substation CPUC 10-11-012	Adjacent to the south side on I-10, east of Aztec Road, and west of Corn Springs Road, in unincorporated Riverside County	Southern California Edison	Existing	75	500/250 kV substation, two new parallel 500 kV transmission lines of about 2,500 to 3,500 feet each looping the substation into the existing DPV 500 kV transmission line (DPV1), and two parallel 500 kV transmission lines of about 2,500 to 3,500 feet each looping the new substation into the DPV2 line.

Table 4.1-2. Existing Projects Within the Cumulative Impact Analysis Area

ID#	Project Name; Agency ID	Location	Ownership	Status	Acres	Project Description
17	Blythe Solar Power Generation Station 1	6 miles north of Blythe	Blythe Solar Power Generation Station 1, LLC	Existing	29.4	4.76 MW solar PV facility; on 29.4 acres
18	McCoy Solar Energy Project (MSEP); CACA-48728	10 miles northwest of Blythe	McCoy Solar LLC	ROW Grants approved by BLM in December, 2013 and August, 2014. Under construction, expected to be completed in August, 2016.	4,014	Up to a 750 MW PV solar power plant using photovoltaic technology; 16-mile-long 230 kV generation tie and switchyard that would connect to SCE's CRSS.

Table 4.1-3. Reasonably Foreseeable Projects Within the Cumulative Impact Analysis Area

ID#	Project Name; Agency ID	Location	Ownership	Status	Acres	Project Description
A	Three Commercial Projects	Blythe, CA	Various	Approved	N/A	Three commercial projects have been approved by the Blythe Planning Department including the Agate Road Boat & RV Storage, Riverway Ranch Specific Plan, and Agate Senior Housing Development.
B	Intake Shell	Blythe, CA	Shell	Under Construction	N/A	Reconstruction of a Shell facility located at Intake and Hobson Way. Demolition occurred in 2008, reconstruction planned for 2009-2010.
C	Eleven Residential Developments	Blythe, CA	Various	Approved/ Under Construction	N/A	Eleven residential development projects have been approved by the Blythe Planning Department including: Van Weelden (184 SFR), Sonora South (43 SFR), Irvine Assets (107 SFR), Chanslor Village (79 SFR), St. Joseph's Investments (69 SFR), Edgewater Lane (45 SFR), Chanslor Phase II & III (78 SFR), Chanslor Place Phase IV (57 SFR), Palo Verde Oasis Phase IV (29 SFR), Mesa Bluffs Villas Phase IV (26 attached SFR), and Agate Senior Housing (81 MFR). Two of these, Chanslor Place and Mesa Bluffs Villas, are under construction as of March, 2016.
D	Desert Southwest Transmission Line; CACA-044491	118 miles primarily parallel to DPV	Imperial Irrigation District	Approved June 2007, Plan of Development submitted 2009	N/A	118-mile 500 kV transmission line from Blythe Energy Project Substation to the existing Devers Substation. Located adjacent to SCE's existing 500 kV DPV1 transmission line.
E	Eagle Mountain Pumped Storage Project; FERC 13123-002	Eagle Mountain iron ore mine, north of Desert Center	Eagle Crest Energy Company	Final EIS published Jan. 2012.	1,524	1,300 MW pumped storage project on a 1,524 acres, designed to store off-peak energy to use during peak hours.

Table 4.1-3. Reasonably Foreseeable Projects Within the Cumulative Impact Analysis Area

ID#	Project Name; Agency ID	Location	Ownership	Status	Acres	Project Description
F	Palen Solar Project (formerly Palen Solar Energy Project); CACA-048810	North of I-10, 10 miles east of Desert Center	Palen Solar III, LLC, a subsidiary of EDF Renewable Energy	Solar thermal plant approved by CEC in 2010 and BLM in 2011, but not built. Modified project proposed in 2013, but withdrawn in 2014. Revised POD for 500 MW solar PV plant submitted to BLM in December, 2015. Draft EIS issued in October 2017.	5,200	500 MW solar PV facility.
G	Blythe Airport Solar I Project	Blythe Airport	U.S. Solar	City of Blythe approved the project in November, 2009 Building Permit applied for December, 2010	640	100 MW photovoltaic (PV) power plant; 640 acres; constructed in five 20 MW phases; includes a 3,200-foot-long 33 kV generation tie.
H	Modified Blythe Solar Power Project (Modified BSPP); CACA-48811	North of I-10, immediately north of the Blythe Airport	NextEra	ROW Grant approved by BLM in August, 2014. Notice to Proceed for construction was issued March 19, 2015. Project is expected to be completed in August, 2016.	4,138	485 MW PV solar plant; 4,138 acres of BLM-administered public land.
I	Desert Harvest Project; CACA-049491	6 miles north of Desert Center	EDF Renewable Energy	BLM Record of Decision (ROD) signed on March, 13, 2013. BLM is awaiting Applicant's submittal of documentation in order to issue a Notice to Proceed with construction.	1,280	100 MW PV solar plant, 1,280 acres.

Table 4.1-3. Reasonably Foreseeable Projects Within the Cumulative Impact Analysis Area

ID#	Project Name; Agency ID	Location	Ownership	Status	Acres	Project Description
J	Eagle Mountain Landfill Project; CACA-30070 CACA-25594 CACA-31926	Eagle Mountain, North of Desert Center	Mine Reclamation Corporation and Kaiser Eagle Mountain, Inc.	Land exchange for the project was not properly approved. Kaiser's Mine and Reclamation is considering all available options.	3,500	The project is proposed to be developed on a portion of the Kaiser Eagle Mountain Mine in Riverside County, California. The proposed project comprises a Class III nonhazardous municipal solid waste landfill and the renovation and repopulation of Eagle Mountain Townsite. The proposal by the proponent includes a land exchange and application for rights-of-way with the Bureau of Land Management and a Specific Plan, General Plan Amendment, Change of Zone, Development Agreement, Revised Permit to Reclamation Plan, and Tentative Tract Map with the County.
K	RCL00161R1	North of 95, east of Intake Blvd	N/A	Reclamation Plan applied for September, 2009	38	Expansion of gravel pit from 12.95 acres to 38 acres.
L	BGR100258	Ehlers Blvd and W Chanslor Way	N/A	Grading Permit applied for November, 2010	<1	Grading permit for 9000 square foot church
M	BNR100126	8 miles south of the intersection of HWY 177 and HWY 10.	U.S. Solar	Building Permit applied for December, 2010	400	49.5 MW solar PV plant (PP24754)
N	Palo Verde Mesa Solar Project	5 miles northwest of Blythe	Renewable Resources Group, Inc.	Proposed: Conditional Use Permit applied for September 2011; Public Use Permit applied for July 2012.	3,250	Up to 486 MW solar PV generating facility. The project would include a solar panel array, two on-site electrical substations, a maintenance building, and ancillary facilities. A 14.7-mile 230 kV transmission line would cross lands under County, City of Blythe, and BLM jurisdiction to connect to the CRSS.
O	Eagle Mountain; CACA-51664	Eagle Mountain, north of Desert Center	L.H. Renewables	Testing	3,500	3,500-acre wind facility with met towers.

Table 4.1-3. Reasonably Foreseeable Projects Within the Cumulative Impact Analysis Area

ID#	Project Name; Agency ID	Location	Ownership	Status	Acres	Project Description
Q	RE Crimson Solar Project (formerly Sonoran West; CACA-51967)	12 miles west of Blythe	Sonoran West Holdings, a subsidiary of Recurrent Energy, LLC.	Application received	4,000	450 MW solar PV facility and 450 MW of integrated energy storage capacity.
R	Mule Mountain III; CACA-50390	15 miles southwest of Blythe	Solar Reserve	Application received August 13, 2008	8,160	150 MW power tower
S	Blythe Mesa Solar Project (BMSP)	Adjacent to east boundary of DQSP	Renewable Resources Group	BLM issued Record of Decision in August, 2015. Construction not begun as of November, 2018.	3,665	485 MW solar PV facility on private land, with gen-tie on BLM land.
T	Blythe Energy Project II	City of Blythe, north of I-10, 7 miles west of the CA/AZ border	Caithness Blythe II, LLC	Approved, but construction not begun.	76	520 MW combined-cycle natural gas-fired electric-generating facility. Project is connected to the Buck Substation owned by WAPA.
U	Ten West Link Transmission Project	Adjacent to southwestern boundary of DQSP.	DCR Transmission, LLC	Environmental review initiated in August, 2016.	N/A	114 mile proposed 500 kV transmission line from Tonopah, Arizona to CRSS.

1 – In the Draft PA/EIS/EIR, ID# P represented the Rio Mesa Project, which has been cancelled. The ID#s for the remaining projects have not been re-numbered.

Solar, wind, and geothermal projects are also being considered on BLM land in Nevada and Arizona. However, none of these are located in the vicinity of the Desert Quartzite Project area. The closest is the Quartzsite Solar Energy Project, located more than 30 miles northeast of the Project site, and separated from the Palo Verde Valley by the Dome Rock Mountains. Large renewable projects now described in applications to the BLM and on private land are competing for utility Power Purchase Agreements, which will allow utilities to meet state-required Renewables Portfolio Standards. Not all of the projects listed will enter the environmental review process or be approved, and not all projects will be funded and ultimately constructed.

4.1.6 Mitigation Measures Included in the Analysis

The impact analyses are based on the Applicant's description of their proposed Project, and that description includes, for some resources, Applicant-Proposed Measures (APMs). The impact analyses assume that APMs are to be implemented, and these measures are therefore requirements for approval of the Project.

For impacts identified in the following resource sections, measures have been developed to avoid or reduce potential environmental effects that would be implemented during all appropriate phases of the Project from initial ground breaking and construction, to operation and maintenance, and through closure and decommissioning. The measures include a combination of the following:

1. APMs, as specified in the Applicant's POD, management plans, and technical reports;
2. Regulatory requirements of other Federal, state, and local agencies;
3. USFWS terms and conditions identified in the BO; and
4. Additional BLM-proposed mitigation measures, ROW grant terms and conditions, and best management practices (BMPs).

These requirements generically are referred to as "mitigation measures" throughout this Final PA/EIS/EIR. Seven mitigation measures require compensatory mitigation, including VEG-9, VEG-10, WIL-4, WIL-5, WIL-9, WIL-10, and WIL-12. The CDCA Plan, as amended by the NECO Plan, identifies compensatory mitigation requirements for impacts to the Mojave desert tortoise and Mojave fringe-toed lizard. Additionally, the BO (Appendix M) identifies required compensatory mitigation to address impacts to the Mojave desert tortoise under the Endangered Species Act. The remaining measures have been considered and incorporated by the BLM as part of California state laws, plans, and programs that require compensatory mitigation, in accordance with BLM Washington Office Instruction Memorandum 2019-018.

Descriptions of the proposed mitigation measures for impacts identified for each of the resources are included in Appendix G.

4.1.7 Terms and Conditions found in FLPMA and BLM ROW Regulations

Title V of FLPMA addresses the issuance of ROW authorizations on public land. The general terms and conditions applicable to all public land ROWs are described in FLPMA §505, and include measures to minimize damage and otherwise protect the environment, and requirements for compliance with air and water quality standards, as well as compliance with more stringent state standards for public health and safety, environmental protection, siting, construction, operation, and maintenance of ROWs.

The Secretary may prescribe additional terms and conditions as s/he deems necessary to protect Federal property, provide for efficient management, and among other things, generally protect the public interest in the public lands subject to or lands adjacent thereto. For this Project, additional terms and conditions will be incorporated into the ROW grant that are necessary to protect public safety, including security fencing and on-site personnel. The environmental consequences analysis in this Final PA/EIS/EIR identifies impacts and mitigation measures to reduce or avoid impacts. The mitigation measures identified by the BLM and incorporated as terms and conditions of the ROW grant provide those actions necessary to prevent unnecessary or undue degradation of the public lands as required by FLPMA §302. The additional mitigation measures that are identified and described in the Final PA/EIS/EIR and that would be enforced by the other agencies, as noted above, provide additional protection to public land resources.

Finally, all BLM ROW grants are approved subject to regulations contained at 43 CFR §2800. Those regulations specify that the BLM may, at any time, change the terms and conditions of a ROW grant “as a result of changes in legislation, regulations, or as otherwise necessary to protect public health or safety or the environment” (43 CFR §2805.15(e)).

If the ROW grant is authorized, the BLM will monitor conditions and review any ROW grant stipulations and terms and conditions issued for the Project to evaluate if future changes to the grant are necessary or justified under this provision of the regulations to further minimize or reduce impacts resulting from the Project. Changes may be subject to additional NEPA analysis.

If approved, the solar energy ROW authorization would include diligent development terms and conditions, consistent with the requirements of 43 CFR §2805.12(i)(5). Failure of the holder to comply with the diligent development terms and conditions provides the BLM authorized officer (AO) the authority to suspend or terminate the authorization (43 CFR §2807.17).

If approved, the solar energy ROW authorization would include a required “Performance and Reclamation” bond to ensure compliance with the terms and conditions of the ROW authorization, consistent with the requirements of 43 CFR §2805.12(g). The “Performance and Reclamation” bond would consist of three components. The first component would be hazardous materials, the second component would be the decommissioning and removal of improvements and facilities, and the third component would address reclamation, revegetation, restoration, and soil stabilization.

4.2 Air Resources

4.2.1 Methodology for Analysis

This analysis of potential air resources-related impacts of the Proposed Action and Alternatives is based on criteria pollutant emission estimates, public health risk, and cumulative impacts that would be associated with construction, operation and maintenance, and decommissioning of the Project. The methodology and results from air emissions estimates are included in the Air Quality and Greenhouse Gas Technical Study (URS 2015, provided in Appendix W). Analyses of emissions of greenhouse gases (GHGs) are presented separately in Sections 3.8 and 4.8.

Independent of NEPA, Section 176 of the CAA requires that Federal agency activities, including licensing and permitting, within EPA-designated nonattainment or maintenance areas must comply with applicable General and Transportation Conformity Rules/Regulations. However, the study area has no nonattainment or maintenance designations for any NAAQS. Consequently, formal CAA conformity requirements do not apply to Federal agency actions related to the Proposed Action or Alternatives.

However, for the purposes of this analysis, the CAA conformity to *de minimis* levels are used as mass emissions indicators for adverse annual emissions. The CAA conformity thresholds for maintenance areas (i.e., areas that currently meet Federal air quality standards, but have violated the standards in prior years), which in the Project area are 100 tons per year per pollutant, are used in this analysis to gauge the potential for the Project and alternatives to result in an exceedance of NAAQS.

The MDAQMD has been the delegated local authority by the EPA to implement and enforce most Federal requirements that are applicable to the Project. Compliance with the MDAQMD regulations assures compliance and consistency with the corresponding Federal requirements because the MDAQMD requirements are more stringent. Project-related construction and operation and maintenance emissions are also compared to MDAQMD thresholds to determine whether the Project and alternatives could result in an exceedance of the CAAQS.

Construction Emissions

Alternative 1: Proposed Action

The primary sources of air emissions during the construction of the Project would include exhaust from heavy equipment and vehicles, as well as fugitive dust generated in areas disturbed by grading, excavating, earth moving, and the movement of various construction vehicles around the site.

Emissions from vehicles and equipment during construction would include:

- Exhaust from the off-road construction equipment, including diesel construction equipment used for site grading, excavation, and construction of on-site structures, generators, and water trucks used to control construction dust emissions.
- Exhaust from on-road construction vehicles, including diesel fuel trucks and water trucks used to transport fuel and water between the local Blythe area and the construction site, and from diesel trucks used to deliver concrete, material, equipment, and construction supplies to the construction site.

- Exhaust from vehicles used by workers to commute to the construction site.

Fugitive dust emissions from the construction of the Project would include:

- Site grading/excavation activities at the construction site.
- Installation of the 230 kV gen-tie line foundations.
- Installation of conductors along the gen-tie route.
- Installation of solar array foundation and related equipment installation.
- On-site vehicle and equipment travel on unpaved surfaces.
- Off-site travel of worker vehicles and trucks on unpaved and paved roads.

Exhaust emissions from construction equipment and vehicles were estimated using equipment lists and construction scheduling information. Mass emissions of all criteria pollutants were estimated using equipment-specific OFFROAD2011/2007 software published by the ARB. ARB's EMFAC2014 model was used to generate emission factors specific to each vehicle for criteria pollutants. For volatile organic compounds (VOCs), the model calculates an emission value for Reactive Organic Gases (ROG), which is equivalent to EPA's VOC definition.

The assumptions used in calculating emissions from Project construction included a 25-month construction period with 5 construction days per week (21 work-days per month). The weight and speed for equipment and vehicle were assumed from EMFAC/OFFROAD guidance, EPA AP-42, and other similar solar project and construction project experience. The Project-related vehicular traffic distances on offsite paved roads were measured and included in the emission estimates. All off-site road travel was assumed to be within the MDAQMD jurisdiction area.

Fugitive dust emissions resulting from on-site soil disturbances were estimated using EPA AP-42 emission factors for activities including bulldozing and dirt-pushing, travel on paved and unpaved roads, and material handling of aggregate materials. PM_{2.5} emissions were scaled from factors determined using guidance from SCAQMD Final Methodology to Calculate PM_{2.5} and PM_{2.5} Significance Thresholds (10/1/2006, Appendix A Updated CEIDARS Table with PM_{2.5} Fractions) (SCAQMD 2006).

Other modeling assumptions included the number of vehicle and truck trips. The estimated construction workforce is expected to require up to 450 vehicle trips per day, with a maximum of 810 vehicle trips per day during peak construction. Approximately 14,400 truck deliveries of equipment, materials and fuel were estimated to be required over the course of the construction period. If onsite groundwater or local wells are not used, then water will be trucked into the Project site from an off-site source(s), and would potentially require up to approximately 57,000 water deliveries.

The primary hazardous air pollutant emission associated with the Project and alternatives would be Diesel Particulate Matter (DPM) emissions from heavy construction equipment. Small quantities of other hazardous air pollutants would be associated with gasoline-fueled vehicles also operating onsite during construction. The location of hazardous pollutant emissions from construction equipment operation would vary across the Project site over the construction period, and thus would not be in a fixed location for long periods of time.

The MDAQMD CEQA Guidelines state that an industrial project within 1,000 feet of a sensitive receptor must be evaluated quantitatively to determine if it would expose sensitive receptors to

substantial pollutant concentrations based on the criteria presented in the guidelines (MDAQMD 2011). Because there are no sensitive receptors within 1,000 feet of the Project site, health risks are assessed qualitatively and a full health risk assessment was not warranted for the Project.

Alternative 2: Resource Avoidance Alternative

The annual criteria pollutant emissions that would be generated within the MDAB under Alternative 2 were estimated based on the analysis developed for the Proposed Action, but scaled, where applicable, to account for differences in Project activities between Alternative 2 and the Proposed Action. The Project features which affect the calculation of emissions, include:

- Alternative 2 would involve the same peak number of construction workers as the Proposed Action, and therefore the same peak onsite and offsite emissions associated with the vehicles of commuting workers.
- Alternative 2 would involve the same peak number of onsite construction vehicles and equipment as the Proposed Action, and therefore the same peak onsite emissions associated with construction equipment.
- Alternative 2 would involve the same peak number of truck deliveries of Project components and equipment as the Proposed Action, and therefore the same peak onsite and offsite emissions associated with delivery trucks.
- Alternative 2 would involve ground disturbance of a smaller area than the Proposed Action, and therefore would result in a reduced amount of fugitive dust associated with ground disturbance. The fugitive dust emissions for the Proposed Action were based on an assumption that grading requirements would total 838,000 cubic yards. The Applicant estimates that the grading requirements for Alternative 2 would total 750,000 cubic yards, or approximately 89 percent of the Proposed Action. Therefore, the fugitive dust emissions for Alternative 2 were estimated by scaling down the fugitive dust emissions of the Proposed Action by 11 percent.

Alternative 3: Reduced Project Alternative

The annual criteria pollutant emissions that would be generated within the MDAB under Alternative 3 were estimated based on the analysis developed for the Proposed Action, but scaled, where applicable, to account for differences in Project activities between Alternative 3 and the Proposed Action. The Project features that affect the calculation of emissions, include:

- Alternative 3 would involve the same peak number of construction workers as the Proposed Action, and therefore the same peak onsite and offsite emissions associated with the vehicles of commuting workers.
- Alternative 3 would involve the same peak number of onsite construction vehicles and equipment as the Proposed Action, and therefore the same peak onsite emissions associated with construction equipment.
- Alternative 3 would involve a reduced number of truck deliveries of Project components and equipment from that of the Proposed Action. The Applicant estimates that the Proposed Action and Alternative 2 would require up to 14,400 truck deliveries, while Alternative 3 would require 10,800 deliveries, a reduction of 25 percent. Therefore, the onsite and offsite emissions associated with truck deliveries for Alternative 3 were

estimated by scaling down the vehicle dust and fugitive dust emissions of the Proposed Action by 25 percent.

- Alternative 3 would involve ground disturbance of a smaller area than the Proposed Action, and therefore would result in a reduced amount of fugitive dust associated with ground disturbance. The fugitive dust emissions for the Proposed Action were based on an assumption that grading requirements would total 838,000 cubic yards. The Applicant estimates that the grading requirements for Alternative 3 would total 670,000 cubic yards, or approximately 80 percent of the Proposed Action. Therefore, the fugitive dust emissions for Alternative 3 were estimated by scaling down the fugitive dust emissions of the Proposed Action by 20 percent.

Alternative 4: No Action Alternative

The No Action Alternative would not result in any increase in air emissions.

Operation and Maintenance Emissions

Operation-related criteria pollutant emissions, including fugitive dust, would be generated from onsite equipment and onsite and offsite vehicle use.

The workforce for operations and security purposes is estimated to be 5 full-time workers. The expected annual demand for water is approximately 38 acre feet per year (AFY). Only limited deliveries would be necessary for replacement PV modules and equipment during operations and maintenance; up to 15 daily round trips were estimated for workers and deliveries. Off-road equipment is not expected to be used during Project operations. The methodology to estimate operational emissions and construction emissions from the on-road vehicles are identical.

There would be few sources of hazardous air pollutant emissions other than limited onsite vehicle traffic at the Project site during facility operation and maintenance.

Alternatives 2 and 3 would involve the same number of operations workers and deliveries as the Proposed Action. Therefore, operations and maintenance emissions for Alternatives 2 and 3 were assumed to be the same as those of the Proposed Action.

Decommissioning Emissions

The sources of emissions from decommissioning of the Proposed Action were assumed to be similar to those associated with construction. Because the land area and number of Project components under Alternatives 2 and 3 would both be reduced from those associated with construction, the emissions associated with decommissioning of these alternatives would be reduced by approximately the scale factor as would the construction emissions.

4.2.1.1 CEQA Significance Criteria

The criteria listed below were used to determine if the Proposed Project would result in significant impacts to air quality. These criteria were obtained from the CEQA Environmental Checklist, Appendix G of the state CEQA Guidelines and from the MDAQMD CEQA Guidelines (MDAQMD 2011). The thresholds from both sources have been combined into a single set of criteria to define that a project could have potentially significant impact if it would:

AIR-1) Conflict with or obstruct implementation of the applicable air quality attainment or maintenance plan.

AIR-2) Violate any air quality standard or contribute substantially to an existing or projected air quality violation when added to the local background. The MDAQMD significance thresholds for criteria pollutants are shown in Table 4.2-1.

AIR-3) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

AIR-4) Expose sensitive receptors to substantial pollutant concentrations including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1. As defined in the MDAQMD’s CEQA Guidelines, sensitive receptors include land uses associated with residences, schools, daycare centers, playgrounds, and medical facilities. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated using CEQA Significance Criterion AIR-4:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet; or
- A gasoline dispensing facility within 300 feet.

AIR-5) Create objectionable odors affecting a substantial number of people.

The following additional significance criteria from the County of Riverside CEQA Environmental Assessment Form are used in the analysis. A project could have potentially significant impacts if it would:

AIR-6) Expose sensitive receptors that are located within one mile of the Project site to substantial point source emissions.

AIR-7) Involve the construction of a sensitive receptor located within one mile of an existing substantial point source emitter.

Table 4.2-1. MDAQMD’s CEQA Significant Emissions Thresholds

Pollutant	Annual Threshold (Tons)	Daily Threshold (Pounds)
Carbon monoxide (CO)	100	548
Oxides of nitrogen (NO _x)	25	137
Volatile organic compounds (VOC)	25	137
Oxides of sulfur (SO _x)	25	137
Particulate matter (PM ₁₀)	15	82
Particulate matter (PM _{2.5})	15	82
Hydrogen Sulfide (H ₂ S)	10	54

Source: MDAQMD 2011

4.2.2 Applicant-Proposed Measures (APMs)

In their Air Quality and Greenhouse Gas Technical Study (URS 2015), the Applicant described APMs which would be implemented to reduce emissions from the Project. During construction, operations and maintenance, and decommissioning, watering of unpaved travel surfaces would occur and travel speed on unpaved surfaces would be limited to 15 miles per hour. The measure for watering at least three times per day or equivalent control, and for a speed limit of 15 miles per hour, intend to achieve a combined dust control efficiency of 83 percent (SCAQMD 2012) during temporary construction activities on unpaved surfaces at the Project site and the off-site unpaved access road (16th Avenue/Seeley Avenue) to SR-78. The assumption of an 83 percent of combined dust mitigation efficiency from watering and limiting speeds to 15 miles per hour was also used for estimating emissions from bulldozing, grading, dirt piling, and material handling activities. All dust emissions from travelling on paved roads off-site was assumed to be non-mitigated, for the purposes of estimating the emissions. The Applicant may achieve required control efficiency through application of dust suppressants, consistent with applicable regulations.

In addition, as described in Section 2.3.7.6, the Applicant has developed a preliminary summary of a Dust Control Plan to control fugitive dust emissions during Project construction. Prior to the Notice to Proceed, the Dust Control Plan would be developed in conformance with requirements of the MDAQMD Rule 403.2, Fugitive Dust Control for the Mojave Desert Planning Area, and other applicable state or County requirements. The Plan would include requirements such as use of water or dust suppressants on dirt roads and graded areas, speed limits for vehicles, covers for vehicles transporting soil, and cleaning and maintaining vehicles and equipment. Dust control measures and BMPs would include limiting ground disturbance and vegetation removal to the extent practicable; using water on unpaved areas and stockpiles; stabilizing inactive surfaces and stockpiles with soil binders or dust palliatives; covering stockpiles during windy conditions; using gravel at key locations on roads to prevent track-out; covering bulk material on trucks; maintain 15 mile per hour speed limits for loaded vehicles on public and private earthen or gravel roads; and suspending grading activities during periods of high wind.

The emission estimates for Project construction and emissions assumed that the APMs and the Dust Control Plan described above would be implemented as part of the Project.

As discussed in Section 4.1.6, the impact analysis assumes that the APMs have been implemented, and these measures are therefore requirements for approval of the Project. The APMs are to be incorporated into the EICMPP/MMRCP, along with the agency-required mitigation measures.

4.2.3 Direct and Indirect Impacts

4.2.3.1 Alternative 1: Proposed Action

Construction

Criteria Pollutant Emissions

Project construction would generate emissions of criteria pollutants through direct emissions from construction-related vehicles, as well as fugitive dust emissions. In general, ground disturbance associated with construction acts to increase fugitive dust emissions by removing stabilizing vegetation and crusts. Dusts are emitted immediately as construction vehicles traverse soils. Dusts are also emitted after construction vehicles have left an area, because once surficial vegetation and crusts are removed, exposed soils are unprotected and become vulnerable to both wind and water

erosion. Two methods to reduce fugitive dusts associated with construction are 1) to minimize the amount of soil disturbance that occurs by reducing grading and vegetation removal to the maximum extent practicable, and 2) to stabilize areas that have been disturbed.

Tables 4.2-2 and 4.2-3 summarize the worst-case daily and annual construction air emissions. Table 4.2-2 compares the maximum daily construction emissions with the applicable MDAQMD thresholds of significance, while Table 4.2-3 compares the maximum annual construction emissions with the MDAQMD thresholds of significance. The emissions estimates in Tables 4.2-2 and 4.2-3 show that the emissions associated with Project construction activities would exceed applicable MDAQMD daily and annual thresholds for NO_x, PM₁₀, and PM_{2.5} emissions, resulting in an adverse effect. The onsite PM₁₀ and PM_{2.5} emissions estimates account for reductions from the APMs (application of watering and speed limit of 15 miles per hour on unpaved travel surfaces). The analysis assumes that the control efficiency associated with the Applicant proposed dust control measures would be 83 percent.

The vast majority of Project-related PM₁₀ and PM_{2.5} emissions (approximately 88 percent) are not generated onsite, but are generated by worker vehicles and delivery trucks traversing the unpaved, 5.6-mile long segment of 16th Avenue/Seeley Avenue between the site entrance and the beginning of pavement near SR-78. Mitigation Measure TRN-4 would require that the Applicant improve this segment, a length of approximately 5.6 miles, prior to beginning any other construction activities at the Project area. This measure would reduce likely emissions of PM₁₀ and PM_{2.5} during construction.

As shown in Table 4.2-3, the annual emissions for all pollutants would be below the respective annual *de minimis* levels (below 100 tons/year), except for PM₁₀, which would exceed the *de minimis* level. The projected exceedance of the PM₁₀ MDAQMD annual emissions threshold would also contribute to the non-attainment for PM₁₀ in the area under CAAQS. The magnitude of the exceedance of the *de minimis* level and the MDAQMD annual threshold would likely be reduced by improvement of the access road under Mitigation Measure TRN-4. However, exceedance of the *de minimis* level and the MDAQMD annual threshold would still occur.

Implementation of mitigation measures AQ-1 (dust control plan), AQ-2 (protect the stability of desert pavement areas), and TRN-4 (improvement of the access road) would minimize air quality impacts to the extent feasible, particularly related to emissions of PM_{2.5} and PM₁₀. MDAQMD Rule 403.2 requires that soil stabilizers be used on exposed surfaces to reduce fugitive dust emissions. Even with these mitigation measures, the PM₁₀ emissions during construction would exceed the MDAQMD regional significance threshold of 82 pounds/day. The exceedance of the MDAQMD thresholds and the annual *de minimis* level would be temporary, occurring only during the 25 month construction period. Upon completion of construction, these emissions would cease.

Table 4.2-2. Proposed Action Construction Daily Emission Estimations (Pounds/Day)

Daily Emissions (Pounds Per Day)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG
On-site emissions	279.93	14.37	294.30	32.95	13.22	46.17	271.61	0.50	158.55	24.86
Off-site emissions	2,539.00	2.90	2,541.91	261.26	2.76	264.02	151.38	0.85	342.55	19.75
Total	2,818.94	17.27	2,836.21	294.21	15.98	310.19	422.99	1.35	501.10	44.61
MDAQMD CEQA daily threshold	NA	NA	82	NA	NA	82	137	137	548	137
Exceed the threshold (Yes/No)	NA	NA	Yes	NA	NA	Yes	Yes	No	No	No

Note: NA = Not Applicable.

Table 4.2-3. Proposed Action Construction Annual Emission Estimations (Tons/Year)

Annual Emissions (Tons per Year)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG
On-site emissions	31.05	1.62	32.67	3.68	1.49	5.17	30.19	0.06	17.96	2.80
Off-site emissions	266.97	0.29	267.26	27.47	0.27	27.75	15.00	0.09	37.13	2.05
Total	298.02	1.91	299.92	31.15	1.76	32.91	45.19	0.15	55.09	4.86
<i>de minimis</i> level	NA	NA	100	NA	NA	100	100	100	100	100
MDAQMD CEQA annual threshold	NA	NA	15	NA	NA	15	25	25	100	25
Exceed the threshold (Yes/No)	NA	NA	Yes	NA	NA	Yes	Yes	No	No	No

Note: NA = Not Applicable.

Toxic Air Contaminants

Emissions of hazardous air pollutants (air toxics) are limited for construction of solar PV generating facilities, and from a health risk perspective are primarily associated with the emissions of DPM. DPM would be emitted from construction equipment and diesel fueled construction vehicles. MDAQMD requirements for health risk assessments categorize project sites by land use type and define the distance from the project site within which sensitive receptors must be considered for increased health risk. The worst case potential impact radius is associated with “Any industrial project” which requires that sensitive receptors within 1,000 feet of the project be considered. Though solar projects are not specifically identified in the categories, this worst case radius was assumed as the criterion for determining potential risks from exposure to DPM during construction. Using the associated definition of sensitive receptors, which include residences, schools, daycare centers, playgrounds, and medical facilities, it was determined that there would

be little risk from exposure to DPM during construction because the closest sensitive receptor is located approximately 3,700 feet from the Project area.

Odors

Construction equipment may create mildly objectionable odors. The specific potential minor odor sources during construction would include equipment and construction vehicle exhausts. The impact is not expected to be substantial, because construction activities would be intermittent and spatially dispersed, and because the closest sensitive receptor is located approximately 3,700 feet from the Project area.

Operation and Maintenance

Operation of the Project would result in substantially lower emissions than Project construction, since the Project would not have any major stationary emission sources. Annual emission estimates for operation of all of the action alternatives are shown in Table 4.2-4. The emission estimates in Table 4.2-4 show that emissions from operation of the Project would all be below MDAQMD thresholds and *de minimis* levels. Impacts associated with operation and maintenance of the Project would not be expected to result in or contribute to an exceedance of a NAAQS or CAAQS.

Table 4.2-4. Operational Annual Emission Estimations for All Action Alternatives (Tons/Year)

Annual Emissions (Tons per Year)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG
On-site emissions	0.16	0.00	0.16	0.02	0.0001	0.02	0.01	0.00001	0.0019	0.0004
Off-site emissions	9.02	0.03	9.04	0.93	0.02	0.96	1.26	0.003	0.61	0.09
Total	9.17	0.03	9.20	0.95	0.02	0.97	1.26	0.003	0.61	0.09
<i>de minimis</i> level	NA	NA	100	NA	NA	100	100	100	100	100
MDAQMD CEQA annual threshold	NA	NA	15	NA	NA	15	25	25	100	25
Exceed the threshold (Yes/No)	NA	NA	No	NA	NA	No	No	No	No	No

Note: NA = Not Applicable.

Sources of DPM emissions during operation include trucks and maintenance equipment, such as diesel fueled vehicles. DPM emissions during operation would be very limited. Due to the negligible amount of emissions that would be generated during operation and maintenance of the Project, and because the closest sensitive receptor is located approximately 3,700 feet from the Project area, the risk from exposure to DPM during Project operation and maintenance would be negligible. Similarly, exhaust from off-road equipment and on-road vehicle use during Project operation would not be expected to create objectionable odors. Photovoltaic solar projects are not typically large generators of odors.

Decommissioning

At the end of the 30-year term of the ROW grant, Project operation and maintenance would cease and associated facilities would be decommissioned and dismantled, and the site would be restored. Decommissioning activities could generate temporary air pollutant emissions similar to those that would occur during construction of the Project. It is likely that technological advances and continuing stringent regulation of air pollutants would result in lower rates of emissions than during the construction phase of the Project.

4.2.3.2 Alternative 2: Resource Avoidance Alternative

Construction

As discussed in Section 4.2.1, the annual criteria pollutant emissions that would be generated within the MDAB under Alternative 2 were estimated based on the analysis developed for the Proposed Action, but scaled, where applicable, to account for differences in Project activities between Alternative 2 and the Proposed Action. The primary difference between the alternatives is that Alternative 2 would involve ground disturbance of a smaller area than the Proposed Action, and therefore would result in a reduced amount of fugitive dust associated with ground disturbance. The fugitive dust emissions for the Proposed Action were based on an assumption that grading requirements would total 838,000 cubic yards. The Applicant estimates that the grading requirements for Alternative 2 would total 750,000 cubic yards, or approximately 89 percent of the Proposed Action. Therefore, the fugitive dust emissions for Alternative 2 were estimated by scaling down the fugitive dust emissions of the Proposed Action by 11 percent.

Table 4.2-5 provides the estimated maximum daily criteria pollutant emissions that would be generated within the MDAB during construction of Alternative 2. As shown in Table 4.2-5, the maximum daily emissions for VOC, NO_x, CO, SO_x, and PM_{2.5} would be below the respective MDAQMD thresholds. Therefore, construction of Alternative 2 would not result in or contribute to an exceedance of an applicable daily or hourly AAQS. With regard to PM₁₀, the estimated maximum daily emissions would exceed the MDAQMD threshold, indicating that PM₁₀ emissions could result in an exceedance of the state PM₁₀ 24-hour CAAQS.

The emissions estimates in Tables 4.2-5 and 4.2-6 show that the emissions associated with Alternative 2 construction activities would exceed applicable MDAQMD daily and annual thresholds for NO_x, PM₁₀, and PM_{2.5} emissions, resulting in an adverse effect. As shown in Table 4.2-6, the annual emissions for all pollutants would be below the respective annual *de minimis* levels (below 100 tons/year), except for PM₁₀, which would exceed the *de minimis* level. The projected exceedance of the PM₁₀ MDAQMD annual emissions threshold would also contribute to the non-attainment for PM₁₀ in the area under CAAQS.

The vast majority of Project-related PM₁₀ and PM_{2.5} emissions (approximately 88 percent) are not generated onsite, but are generated by worker vehicles and delivery trucks traversing the unpaved, 5.6-mile long segment of 16th Avenue/Seeley Avenue between the site entrance and the beginning of pavement near SR-78. Mitigation Measure TRN-4 would require that the Applicant improve this segment, a length of approximately 5.6 miles, prior to beginning any other construction activities at the Project area. This measure would likely reduce emissions of PM₁₀ and PM_{2.5} during construction.

Implementation of mitigation measures AQ-1 (dust control plan), AQ-2 (protect the stability of desert pavement areas), and TRN-4 (improving the access road) would minimize air quality impacts to the extent feasible, particularly related to emissions of PM_{2.5} and PM₁₀. MDAQMD Rule 403.2 requires that soil stabilizers be used on exposed surfaces to reduce fugitive dust emissions. Even with these measures, the PM₁₀ emissions during construction would exceed the MDAQMD regional significance threshold of 82 pounds/day. The exceedance of the MDAQMD thresholds and the annual *de minimis* level would be temporary, occurring only during the 25 month construction period. Upon completion of construction, these emissions would cease.

Table 4.2-5. Alternative 2 Construction Daily Emission Estimations (Pounds/Day)

Daily Emissions (Pounds per Day)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG
On-site emissions	249.14	14.37	263.51	29.33	13.22	42.55	271.61	0.50	158.55	24.86
Off-site emissions	2,539.00	2.90	2,541.91	261.26	2.76	264.02	151.38	0.85	342.55	19.75
Total	2,788.14	17.27	2,805.42	290.59	15.98	306.57	422.99	1.35	501.10	44.61
MDAQMD CEQA daily threshold	NA	NA	82	NA	NA	82	137	137	548	137
Exceed the threshold (Yes/No)	NA	NA	Yes	NA	NA	Yes	Yes	No	No	No

Note: NA = Not Applicable.

Table 4.2-6. Alternative 2 Construction Annual Emission Estimations (Tons/Year)

Annual Emissions (Tons per Year)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG
On-site emissions	27.63	1.62	29.25	3.28	1.49	4.77	30.19	0.06	17.96	2.80
Off-site emissions	266.97	0.29	267.26	27.47	0.27	27.75	15.00	0.09	37.13	2.05
Total	294.60	1.91	296.51	30.75	1.76	32.52	45.19	0.15	55.09	4.86
<i>de minimis</i> level	NA	NA	100	NA	NA	100	100	100	100	100
MDAQMD CEQA annual threshold	NA	NA	15	NA	NA	15	25	25	100	25
Exceed the threshold (Yes/No)	NA	NA	Yes	NA	NA	Yes	Yes	No	No	No

Note: NA = Not Applicable.

The distances to the closest sensitive receptors (i.e., residences) under Alternative 2 would be the same as under the Proposed Action. Therefore, emissions of DPM from construction would not be

expected to cause adverse health risks at any sensitive receptor in the vicinity of Alternative 2. The impact of odors is not expected to be substantial, because construction activities would be intermittent and spatially dispersed, and because the closest sensitive receptor is located approximately 3,700 feet from the Project area.

Operation and Maintenance

Operation of Alternative 2 would result in substantially lower emissions than Project construction, since the Project would not have any major stationary emission sources. Annual emissions for operations of Alternative 2 would be the same as estimated for operation of the Proposed Action, as shown in Table 4.2-4. The emission estimates in Table 4.2-4 show that emissions from operation of Alternative 2 would all be below MDAQMD thresholds and *de minimis* levels. Impacts associated with operation and maintenance of Alternative 2 would not be expected to result in or contribute to an exceedance of a NAAQS or CAAQS.

Sources of DPM emissions during operation include trucks and maintenance equipment, such as diesel fueled vehicles. DPM emissions during operation would be very limited. Due to the negligible amount of emissions that would be generated during operation and maintenance of the Project, and because the closest sensitive receptor is located approximately 3,700 feet from the Project area, the risk from exposure to DPM during Project operation and maintenance would be negligible. Similarly, exhaust from off-road equipment and on-road vehicle use during Project operation would not be expected to create objectionable odors. Photovoltaic solar projects are not typically large generators of odors.

Decommissioning

At the end of the 30-year term of the ROW grant, operation and maintenance of Alternative 2 may cease in the absence of ROW renewal. In that case, associated facilities would be decommissioned and dismantled, and the site would be restored. It is likely that technological advances and continuing stringent regulation of air pollutants would result in lower rates of emissions than during the construction phase of Alternative 2.

4.2.3.3 Alternative 3: Reduced Project Alternative

Construction

As discussed in Section 4.2.1, the annual criteria pollutant emissions that would be generated within the MDAB under Alternative 3 were estimated based on the analysis developed for the Proposed Action, but scaled, where applicable, to account for differences in Project activities between Alternative 3 and the Proposed Action. The differences between the alternatives are that Alternative 3 would involve ground disturbance of a smaller area than the Proposed Action, resulting in a reduced amount of fugitive dust associated with ground disturbance, and that Alternative 3 would require fewer deliveries of Project components, resulting in a reduced amount of onsite and offsite vehicle emissions.

The fugitive dust emissions for the Proposed Action were based on an assumption that grading requirements would total 838,000 cubic yards. The Applicant estimates that the grading requirements for Alternative 3 would total 670,000 cubic yards, or approximately 80 percent of

the Proposed Action. Therefore, the fugitive dust emissions for Alternative 3 were estimated by scaling down the fugitive dust emissions of the Proposed Action by 20 percent.

Alternative 3 would involve a reduced number of truck deliveries of Project components and equipment from that of the Proposed Action. The Applicant estimates that the Proposed Action and Alternative 2 would require up to 14,400 truck deliveries, while Alternative 3 would require 10,800 deliveries, a reduction of 25 percent. Therefore, the onsite and offsite emissions associated with truck deliveries for Alternative 3 were estimated by scaling down the vehicle dust and fugitive dust emissions of the Proposed Action by 25 percent.

Table 4.2-7 provides the estimated maximum daily criteria pollutant emissions that would be generated within the MDAB during construction of Alternative 3. As shown in Table 4.2-7, the maximum daily emissions for VOC, NO_x, CO, SO_x, and PM_{2.5} would be below the respective MDAQMD thresholds. Therefore, construction of Alternative 3 would not result in or contribute to an exceedance of an applicable daily or hourly AAQS. With regard to PM₁₀, the estimated maximum daily emissions would exceed the MDAQMD threshold, indicating that PM₁₀ emissions could result in an exceedance of the PM₁₀ 24-hour CAAQS.

The emissions estimates in Tables 4.2-7 and 4.2-8 show that the emissions associated with Alternative 3 construction activities would exceed applicable MDAQMD daily and annual thresholds for NO_x, PM₁₀, and PM_{2.5} emissions, resulting in an adverse effect. As shown in Table 4.2-8, the annual emissions for all pollutants would be below the respective annual *de minimis* levels (below 100 tons/year), except for PM₁₀, which would exceed the *de minimis* level. The projected exceedance of the PM₁₀ MDAQMD annual emissions threshold would also contribute to the non-attainment for PM₁₀ in the area under CAAQS.

Implementation of mitigation measures AQ-1 (dust control plan) and AQ-2 (protect the stability of desert pavement areas) would minimize air quality impacts to the extent feasible, particularly related to emissions of PM_{2.5} and PM₁₀. MDAQMD Rule 403.2 requires that soil stabilizers be used on exposed surfaces to reduce fugitive dust emissions. Even with this mitigation measure (AQ-1), the PM₁₀ emissions during construction would exceed the MDAQMD regional significance threshold of 82 pounds/day. The exceedance of the MDAQMD thresholds and the annual *de minimis* level would be temporary, occurring only during the 25 month construction period. Upon completion of construction, these emissions would cease.

Table 4.2-7. Alternative 3 Construction Daily Emission Estimations (Pounds/Day)

Daily Emissions (Pounds per Day)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG
On-site emissions	222.89	14.37	237.26	26.26	13.22	39.47	271.55	0.50	158.54	24.86
Off-site emissions	2477.56	2.59	2480.16	254.79	2.47	257.25	134.41	0.82	339.42	18.56
Total	2700.45	16.96	2717.42	281.04	15.69	296.72	405.96	1.32	497.96	43.42
MDAQMD CEQA daily threshold	NA	NA	82	NA	NA	82	137	137	548	137
Exceed the threshold (Yes/No)	NA	NA	Yes	NA	NA	Yes	Yes	No	No	No

Table 4.2-7. Alternative 3 Construction Daily Emission Estimations (Pounds/Day)

Daily Emissions (Pounds per Day)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG

Note: NA = Not Applicable.

Table 4.2-8. Alternative 3 Construction Annual Emission Estimations (Tons/Year)

Annual Emissions (Tons per Year)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG
On-site emissions	24.74	1.62	26.36	2.93	1.49	4.42	30.19	0.06	17.96	2.80
Off-site emissions	261.43	0.26	261.69	26.89	0.24	27.14	13.42	0.09	36.84	1.94
Total	286.17	1.88	288.05	29.82	1.73	31.56	43.60	0.15	54.80	4.74
<i>de minimis level</i>	NA	NA	100	NA	NA	100	100	100	100	100
MDAQMD CEQA annual threshold	NA	NA	15	NA	NA	15	25	25	100	25
Exceed the threshold (Yes/No)	NA	NA	Yes	NA	NA	Yes	Yes	No	No	No

Note: NA = Not Applicable.

A comparison of the emissions associated with each action alternative is shown in Tables 4.2-9 and 4.2-10. The comparison shows that the overall emissions associated with the alternatives are approximately the same. Alternative 2 PM₁₀ and PM_{2.5} emissions are approximately 98.8 percent of those of the Proposed Action, and Alternative 3 emissions are approximately 96 percent of those of the Proposed Action. This result is because the vast majority of PM₁₀ and PM_{2.5} emissions (approximately 88 percent) are not generated onsite, but are generated by worker vehicles and delivery trucks traversing the unpaved, 5.6-mile long segment of 16th Avenue/Seeley Avenue between the site entrance and the beginning of pavement near SR-78. Because Alternatives 2 and 3 would have the same number of workers and water trucks as the Proposed Action, and would use the same access road, these emissions would be largely unaffected. There would be reductions in emissions associated with the reduced amount of grading under Alternatives 2 and 3, and with the reduction in the number of delivery trucks under Alternative 3. But these reductions would be minor compared to the emissions associated with the use of 16th Avenue/Seeley Avenue under all three action alternatives. Mitigation Measure TRN-4 would require that the Applicant improve this segment, a length of approximately 5.6 miles, prior to beginning any other construction activities at the Project area. This measure would likely reduce emissions of PM₁₀ and PM_{2.5} during construction.

Table 4.2-9. Comparison of Daily Construction Emissions Among Action Alternatives (Pounds/Day)

Daily Emissions (Pounds per Day)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG
Alternative 1 Total	2,818.94	17.27	2,836.21	294.21	15.98	310.19	422.99	1.35	501.10	44.61
Alternative 2 Total	2,788.14	17.27	2,805.42	290.59	15.98	306.57	422.99	1.35	501.10	44.61
Alternative 3 Total	2700.45	16.96	2717.42	281.04	15.69	296.72	405.96	1.32	497.96	43.42
MDAQMD CEQA daily threshold	NA	NA	82	NA	NA	82	137	137	548	137

Note: NA = Not Applicable.

Table 4.2-10. Comparison of Annual Construction Emissions Among Action Alternatives (Tons/Year)

Annual Emissions (Tons per Year)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG
Alternative 1 Total	298.02	1.91	299.92	31.15	1.76	32.91	45.19	0.15	55.09	4.86
Alternative 2 Total	294.60	1.91	296.51	30.75	1.76	32.52	45.19	0.15	55.09	4.86
Alternative 3 Total	286.17	1.88	288.05	29.82	1.73	31.56	43.60	0.15	54.80	4.74
<i>de minimis level</i>	NA	NA	100	NA	NA	100	100	100	100	100
MDAQMD CEQA annual threshold	NA	NA	15	NA	NA	15	25	25	100	25

Note: NA = Not Applicable.

The distances to the closest sensitive receptors (i.e., residences) under Alternative 3 would be the same as under the Proposed Action. Therefore, emissions of DPM from construction would not be expected to cause adverse health risks at any sensitive receptor in the vicinity of Alternative 3. The impact of odors is not expected to be substantial, because construction activities would be intermittent and spatially dispersed, and because the closest sensitive receptor is located approximately 3,700 feet from the Project area.

Operation and Maintenance

Operation of Alternative 3 would result in substantially lower emissions than Project construction, since the Project would not have any major stationary emission sources. Annual emissions for operations of Alternative 3 would be the same as estimated for operation of the Proposed Action, as shown in Table 4.2-4. The emission estimates in Table 4.2-4 show that emissions from

operation of Alternative 3 would all be below MDAQMD thresholds and *de minimis* levels. Impacts associated with operation and maintenance of Alternative 3 would not be expected to result in or contribute to an exceedance of a NAAQS or CAAQS.

Sources of DPM emissions during operation include trucks and maintenance equipment, such as diesel fueled vehicles. DPM emissions during operation would be very limited. Due to the negligible amount of emissions that would be generated during operation and maintenance of the Project, and because the closest sensitive receptor is located approximately 3,700 feet from the Project area, the risk from exposure to DPM during Project operation and maintenance would be negligible. Similarly, exhaust from off-road equipment and on-road vehicle use during Project operation would not be expected to create objectionable odors. Photovoltaic solar projects are not typically large generators of odors.

Decommissioning

At the end of the 30-year term of the ROW grant, operation and maintenance of Alternative 3 would cease and associated facilities would be decommissioned and dismantled, and the site would be restored. It is likely that technological advances and continuing stringent regulation of air pollutants would result in lower rates of emissions than during the construction phase of Alternative 3.

4.2.4 Application of CEQA Significance Thresholds

Emissions estimates for construction and decommissioning of Alternatives 1, 2, or 3 would exceed applicable MDAQMD daily and annual thresholds for NO_x, PM₁₀, and PM_{2.5}. The emissions estimates assume that the APMs and Mitigation Measures AQ-1 and AQ-2 would be applied to each alternative, so these measures would not reduce these emissions to be below MDAQMD thresholds, resulting in a significant and unavoidable impact for construction and decommissioning. Emissions associated with operation of Alternatives 1, 2, or 3 would not exceed applicable MDAQMD thresholds. Therefore, Alternatives 1, 2, and 3 would each have less than significant impacts to air resources during operations and maintenance.

AIR-1) Would the Project conflict with or obstruct implementation of the applicable air quality attainment or maintenance plan?

Because the Project is located in the Federal attainment/unclassified area, there is no applicable air quality plan and SIP from MDAQMD and ARB. Therefore, Alternatives 1, 2, or 3 would not conflict or obstruct implementation of the applicable air quality plan. There would be no impact from Alternatives 1, 2, or 3.

AIR-2) Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation when added to the local background?

As shown in Tables 4.2-2 and 4.2-3 for Alternative 1, Tables 4.2-5 and 4.2-6 for Alternative 2, and Tables 4.2-7 and 4.2-8 for Alternative 3, emissions associated with Project construction activities are expected to exceed applicable MDAQMD daily and annual thresholds for NO_x, PM₁₀, and PM_{2.5} emissions. These emissions estimates already account for the APMs related to watering and speed limits to reduce dust. Even with mitigation measures AQ-1, AQ-2, and TRN-4, emissions

for NO_x, PM₁₀, and PM_{2.5} during construction would exceed the MDAQMD daily and annual thresholds, and these emission levels could cause localized exceedances, or contribute significantly to existing exceedances, of the state or Federal air quality standards, including PM₁₀ for which the Project area is already within the non-attainment area for CAAQS for PM₁₀. Therefore, Alternatives 1, 2, and 3 would each have temporary significant and unavoidable NO_x, PM₁₀, and PM_{2.5} impacts during construction. Due to technological advances and continuing stringent regulation of air pollutants, it is expected that decommissioning emissions would be lower than construction emissions for each of the alternatives.

As shown in Table 4.2-4, emissions associated with Alternatives 1, 2, or 3 operations would not exceed applicable MDAQMD thresholds. Therefore, Alternatives 1, 2, and 3 would each have less than significant impacts during operations and maintenance to air resources.

AIR-3) Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or state ambient air quality standard (including release emissions which exceed quantitative thresholds for ozone precursors)?

Construction and decommissioning of Alternatives 1, 2, or 3 would exceed the MDAQMD CEQA significance thresholds for NO_x, PM₁₀, and PM_{2.5}, and the addition of emissions from cumulative projects would only increase those exceedances. The Project area is within the non-attainment area for CAAQS for PM₁₀. Even with mitigation measures AQ-1, AQ-2, and TRN-4, Alternatives 1, 2, and 3 would result in a cumulatively considerable net increase of nonattainment pollutants (PM₁₀) and would have a significant and unavoidable impact to regional air quality during construction and decommissioning activities; however, the significant impact would be temporary, and would cease upon completion of construction and decommissioning activities.

Emissions associated with Alternatives 1, 2, or 3 operations would not exceed applicable MDAQMD thresholds and therefore the contribution of Alternatives 1, 2, or 3 would not be cumulatively considerable resulting in a less than significant impact. In addition, Alternatives 1, 2, or 3 would provide renewable energy, which would reduce statewide emissions associated with power generation compared to fossil fuel power generation.

AIR-4) Would the Project expose sensitive receptors to substantial pollutant concentrations including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1? As defined in the MDAQMD's CEQA Guidelines, sensitive receptors include land uses associated with residences, schools, daycare centers, playgrounds, and medical facilities. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated using CEQA Significance Criterion AIR-4:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet; or
- A gasoline dispensing facility within 300 feet?

Alternatives 1, 2, or 3 would not expose sensitive receptors within 1,000 feet of the Project to substantial pollutant concentrations, including TACs. Though construction-related emissions from Alternatives 1, 2, or 3 would result in emissions in excess of MDAQMD thresholds for NO_x, PM₁₀, and PM_{2.5}, there are no sensitive receptors within 1,000 feet of the Project area. The closest residence (apparent occupied mobile home trailer) is located approximately 3,700 feet north of the northeast corner of the Alternative 1, 2, or 3 boundary. The next two closest sensitive air quality receptors are located in the residential community of Nicholls Warm Springs/Mesa Verde approximately 4,800 north of the northeast corner of the Alternative 1, 2, or 3 boundary. Impacts associated with construction would be less than significant.

During operations of Alternatives 1, 2, or 3, the emissions of both criteria and toxic pollutants would be relatively small. The decommissioning of Alternatives 1, 2, or 3 would not expose sensitive receptors to substantial pollutant concentrations given the distance of sensitive receptors from the site and the intermittent nature of construction activities. Thus, impacts during construction, operation, maintenance, and decommissioning of Alternatives 1, 2, or 3 would not expose sensitive receptors to substantial pollutant concentrations and therefore would be less than significant.

AIR-5) Would the Project create objectionable odors affecting a substantial number of people?

Alternatives 1, 2, or 3 would not create objectionable odors affecting a substantial number of people. The specific potential minor odor sources during construction of Alternatives 1, 2, or 3 would include equipment and construction vehicle exhausts. Due to the sparse population adjacent to the site, these mild odors would not affect a substantial number of people. During operation of Alternatives 1, 2, or 3, equipment and other activities would not include significant odor-producing sources. Few odor sources would be activated during decommissioning. Thus, impacts would not create objectionable odors affecting a substantial number of people during construction, operation, maintenance, and decommissioning of Alternatives 1, 2, or 3, and therefore would be less than significant.

AIR-6) Would the Project expose sensitive receptors that are located within one mile of the Project site to substantial point source emissions?

There are two sensitive receptors within one mile of Alternatives 1, 2, or 3. One is an apparent occupied mobile home trailer located approximately 3,700 feet north of the northeast corner of the Alternative 1 boundary, approximately 3,200 feet north of the northeast corner of the Alternative 2 boundary, and approximately 6,250 feet north of the northeast corner of the Alternative 3 boundary. The other is a residence located approximately 4,800 feet north of the northeast corner of the Alternative 1 boundary, approximately 4,300 feet north of the northeast corner of the Alternative 2 boundary, and approximately 6,250 feet north of the northeast corner of the Alternative 3 boundary. Although these receptors are located within one mile of the Project boundary, emissions sources would be dispersed throughout the Project area and the access road, and there would be no substantial point source emissions. Therefore, Alternatives 1, 2, or 3 would not expose sensitive receptors that are within one mile of the Project area to substantial point source emissions, and the impact would be less than significant.

AIR-7) Would the Project involve the construction of a sensitive receptor located within one mile of an existing substantial point source emitter?

Alternatives 1, 2, and 3 do not involve the establishment of a use that would be classified as a sensitive receptor. There would be no impact.

4.2.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Chapter 3.2 would be maintained. There would be no air emissions associated with vehicles or equipment, and no fugitive dust emissions from ground disturbance. Therefore Alternative 4 would not result in any air quality impacts.

4.2.6 Cumulative Impacts

The geographic scope considered for potential cumulative impacts to regional air quality is the MDAB. With respect to existing projects, the summary of available air quality data presented in Table 3.2-1 reflects the cumulative contributions of all emissions from those projects, and Table 3.2-2 reflects the attainment status resulting from those emissions. Reasonably foreseeable future projects within the MDAB, both those that release emissions and those that reduce emissions, would be expected to affect the air quality, and potentially the attainment status, in the future.

Because there are no sensitive receptors within 1,000 feet of the Project site, there is no potential for the Project to contribute to cumulative air quality impacts that could exceed the MDAQMD CEQA Guidelines. There are two sensitive receptors within one mile of the Project; one is an apparent occupied mobile home trailer located approximately 3,700 feet north of the northeast corner of the Project boundary, and the other is a residence located approximately 4,800 feet north of the northeast corner of the Project site boundary. The Project could potentially contribute to cumulative impacts to these two receptors, should another project also be located within one mile of these receptors. The only other projects within one mile of those receptors are the NRG Blythe PV Project, and the BMSP.

The temporal scope for the potential for the Project to contribute to cumulative regional air quality impacts is from construction through decommissioning of the Project. However, the time period in which Project emissions would exceed MDAQMD thresholds is within months 6 to 22 of the 25 month construction period. Outside of this time period, Project emissions would be minimal, and would not be a significant contributor to cumulative air quality impacts. Once Project construction ceases, the contribution of the Project to cumulative fugitive dust emissions during operations would be greatly reduced. In addition, once the Project is decommissioned, Project-related air emissions would cease, and the Project would no longer contribute to cumulative air quality impacts.

The ambient air quality and attainment status of the area, discussed in Section 3.2, incorporate emissions from all current sources in the region. Tables 4.2-11 and 4.2-12 present the emissions from other current and potential future sources in the Project area. In 2015, the Blythe Energy

Center and SoCal Gas, both in Blythe, were the largest stationary emitting sources of CO in Riverside County. For NOx in 2015, SoCal Gas was the largest source and the Blythe Energy Center was the fourth-largest source in Riverside County. These non-renewable energy facilities are point sources to which the present Project will add emissions. In addition to these sources, the construction of the Palen and Modified Blythe solar projects may be contemporaneous with that of the Project.

**Table 4.2-11. Daily Construction Emission Estimations for Project and Nearby Projects
(Pounds/Day)**

Daily Emissions (Pounds Per Day)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG/VOC
Project On-site emissions	279.93	14.37	294.30	32.95	13.22	46.17	271.61	0.50	158.55	24.86
Project Off-site emissions	2,539.00	2.90	2,541.91	261.26	2.76	264.02	151.38	0.85	342.55	19.75
Project Total	2,818.94	17.27	2,836.21	294.21	15.98	310.19	422.99	1.35	501.10	44.61
Palen Total ¹	NR	NR	277.7	NR	NR	73.2	660.9	2.3	1,102.9	43.4
Modified Blythe On-Site Emissions ²	674.4	4.7	679.1	83.0	4.3	87.3	122.5	0.2	54.9	18.4
Modified Blythe Off-Site Emissions ²	17.3	7.9	25.2	5.3	7.3	12.6	333.3	0.7	304.2	40.4
Modified Blythe Total ²	691.7	12.6	704.3	88.3	11.6	99.9	455.8	0.9	359.1	58.8
RE Crimson	NR	NR	597.61	NR	NR	98.85	596.46	NR	367.82	52.9
MDAQMD CEQA daily threshold	NA	NA	82	NA	NA	82	137	137	548	137

Note: NA = Not Applicable.

NR = Not Reported

1 – Source is BLM 2017, Palen Draft EIS/EIR. Values were not reported per offsite and onsite, or fugitive versus exhaust. Values provided here are the highest of the 4 years reported. ROG was not reported, but VOCs were reported.

2 – Source is BLM 2015, Modified Blythe Final EIS.

Table 4.2-12. Construction Annual Emission Estimations for Project and Nearby Projects (Tons/Year)

Annual Emissions (Tons per Year)	Pollutant									
	Fugitive Dust PM ₁₀	Exhaust PM ₁₀	Total PM ₁₀	Fugitive Dust PM _{2.5}	Exhaust PM _{2.5}	Total PM _{2.5}	NO _x	SO _x	CO	ROG/VOC
Project On-site emissions	31.05	1.62	32.67	3.68	1.49	5.17	30.19	0.06	17.96	2.80
Project Off-site emissions	266.97	0.29	267.26	27.47	0.27	27.75	15.00	0.09	37.13	2.05
Project Total	298.02	1.91	299.92	31.15	1.76	32.91	45.19	0.15	55.09	4.86
Palen ¹	NR	NR	36.65	NR	NR	9.66	87.24	0.30	145.58	5.73
Modified Blythe On-Site Emissions ²	69.1	0.4	69.5	8.7	0.5	9.2	13.4	0	5.7	2.1
Modified Blythe Off-Site Emissions ²	1.9	0.9	2.8	0.6	0.9	1.5	39.7	0.1	31.7	4.3
Modified Blythe Total ²	71.0	1.5	72.3	9.3	1.4	10.7	53.1	0.1	37.4	6.4
Blythe Energy ³	NR	NR	4.8	NR	NR	NR	35.6	1.9	69.4	4.4
SCG Blythe ³	NR	NR	8.2	NR	NR	NR	330.6	0.2	60.5	32.4
RE Crimson	NR	NR	13.81	NR	NR	2.48	17.17	NR	49.6	1.72
<i>de minimis</i> level	NA	NA	100	NA	NA	100	100	100	100	100
MDAQMD CEQA annual threshold	NA	NA	15	NA	NA	15	25	25	100	25

Note: NA = Not Applicable.

NR = Not Reported

1 – Source is BLM 2017, Palen Draft EIS/EIR. Values were not reported per offsite and onsite, or fugitive versus exhaust. Values provided here are the highest of the 4 years reported. ROG was not reported, but VOCs were reported.

2 – Source is BLM 2015, Modified Blythe Final EIS.

3 – Source is CARB 2018. Emissions are those reported for 2016.

Alternative 1 – Proposed Action

Construction

As discussed in Section 4.2.3, Project construction activities would exceed applicable MDAQMD daily and annual thresholds for NO_x, PM₁₀, and PM_{2.5} emissions, resulting in an adverse effect. In addition, emissions of PM₁₀ would exceed the *de minimis* level, and would also contribute to the non-attainment for PM₁₀ in the area under CAAQS. Even with implementation of APM and mitigation measures (AQ-1), the PM₁₀ emissions during construction would exceed the MDAQMD regional significance threshold of 82 pounds/day. The exceedance of the MDAQMD

thresholds and the annual *de minimis* level would be temporary, occurring only during the 25 month construction period. Upon completion of construction, these emissions would cease.

The cumulative analysis focuses on whether a specific project would result in a cumulatively considerable increase in emissions. By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the air basin, and this regional impact is cumulative rather than attributable to any one source. A project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects.

The MDAQMD thresholds of significance are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions. These thresholds are designed to identify those projects that would result in significant levels of air pollution and to assist the region in attaining the applicable state and Federal ambient air quality standards. Projects that would not exceed the thresholds of significance would not contribute a considerable amount of criteria air pollutant emissions to the region's emissions profile, and would not impede attainment and maintenance of ambient air quality standards.

Because the Project would exceed the air quality significance thresholds for NO_x, PM₁₀, and PM_{2.5} emissions, the Project's construction emissions would have a cumulatively considerable contribution to the region's air quality. The Project area is already within the non-attainment area for CAAQS for PM₁₀. Therefore, the Project would contribute substantially to an existing or projected air quality violation when added to the local background (AIR-2), and would result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is non-attainment under an applicable Federal or state ambient air quality standard (AIR-3).

BLM's Western Solar Plan identifies the energy development projects occurring largely on Federal lands in the East Riverside SEZ. The air quality impact of a solar energy development scenario for the Riverside East SEZ identified theoretical continuous development of 9,000 acres of renewable energy development in the central portion of the SEZ. Based on modeling in the BLM Solar DEIS, 24-hr PM₁₀ concentrations of about 10 micrograms per cubic meter would occur at residences around the eastern portion of the SEZ near Blythe. This concentration added to current ambient concentrations would not be enough to exceed the Federal PM₁₀ standard, but would exceed the state 24-hour standard. While the analysis is very conservative and may overestimate the concentrations, the Western Solar Plan acknowledges that the emissions from cumulative projects (solar and others), combined with natural sources such as dust storms, would temporarily degrade particulate air quality in the SEZ. Aggressive dust control is recommended with implementation of solar projects.

Construction of the Project would not cause a substantial impact due to the generation of odors from diesel equipment emissions because construction activities would be intermittent and spatially dispersed, equipment would conform to California Clean Air Act Section 2449 standards for off-road vehicles, and associated odors would dissipate quickly from the source (impact AIR-5). Additional cumulative projects are not expected to cause diesel-related odors that would intermingle with those of the Project.

With respect to impacts on sensitive receptors, only two sensitive receptors are located within one mile of the Project; one is an apparent occupied mobile home trailer located approximately 3,700 feet north of the northeast corner of the Project boundary, and the other is a residence located

approximately 4,800 feet north of the northeast corner of the Project site boundary. The only other projects within one mile of those receptors are the NRG Blythe PV Project, and the BMSP. Of these, the NRG Blythe PV Project has already been constructed, and its operations-related emissions are expected to be minimal. The analysis of the BMSP concluded that construction would not result in a significant impact to sensitive receptors. Although these two receptors are located within one mile of the DQSP boundary, emissions sources would be dispersed throughout the Project area and along the Project the access road, and there would be no substantial point source emissions. Therefore, cumulative impacts to those receptors would be less than significant, and the Project would not contribute to exposure of sensitive receptors to substantial pollutant concentrations (impact AIR-4).

The Project would not contribute to a conflict with or obstruction of implementation of an applicable air quality attainment or maintenance plan (AIR-1), would not be a source of substantial point source emissions (impact AIR-6), and would not result in placing sensitive receptors within one mile of an existing substantial point source emitter (impact AIR-7). Therefore, the impact of the Project with respect to these criteria would not be cumulatively considerable.

Operations

As discussed in Section 4.2.3, operation of the Project would result in substantially lower emissions than Project construction, since the Project would not have any major stationary emission sources during operations. Annual emissions for Project operation would all be below MDAQMD CEQA annual thresholds and *de minimis* levels, and the contribution of the Project to air quality impacts would not be cumulatively significant.

Decommissioning

It is likely that technological advances and continuing stringent regulation of air pollutants would result in lower rates of emissions during decommissioning than during the construction phase of the Project. In addition, the duration of decommissioning would be approximately one year, and therefore the duration of emissions that exceed MDAQMD thresholds would be shorter than that of construction.

Alternative 2 – Resource Avoidance Alternative

As shown in Tables 4.2-9 and 4.2-10, the emissions associated with Alternative 2 construction and decommissioning activities would be almost the same, although slightly (approximately one percent) lower than those of the Proposed Action. Therefore, the contribution of Alternative 2 to cumulative air quality impacts would be effectively the same as those described for the Proposed Action. The selection of the Resource Avoidance Alternative over the proposed Project would not result in air emissions being reduced to a level that is not cumulatively significant.

Alternative 3 – Reduced Project Alternative

As shown in Tables 4.2-9 and 4.2-10, the emissions associated with Alternative 3 construction and decommissioning activities would be almost the same, although slightly (approximately four percent) lower than those of the Proposed Action. Therefore, the contribution of Alternative 3 to cumulative air quality impacts would be effectively the same as those described for the Proposed

Action. The selection of the Reduced Project Alternative over the proposed Project would not result in air emissions being reduced to a level that is not cumulatively significant.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. Alternative 4 would not contribute to cumulative air quality impacts.

4.2.7 Residual Impacts

A substantial residual Project-specific and cumulative impact would result from short-term construction emissions of NO_x, PM_{2.5}, and PM₁₀ after APMs and mitigation measures have been incorporated, because these emissions would not be reduced to below MDAQMD thresholds. The emissions would be temporary, and would cease once construction is completed. However, any impacts that occurred to human receptors and vegetation due to deposition of nitrogen on soils would continue following the completion of construction.

4.3 Biological Resources – Vegetation

4.3.1 Methodology for Analysis

This section analyzes potential impacts to vegetation resources from construction, operation and maintenance, and decommissioning of the Proposed Action and Alternatives. This analysis of potential impacts relies on results of literature reviews and biological surveys (as summarized in Section 3.3, *Biological Resources – Vegetation*) and coordination with appropriate permitting agencies including the USFWS and CDFW. Acreages calculated for impacts were based on the best information available at the time of publication of the Final PA/EIS/EIR.

Impact analyses typically characterize effects to native vegetation as temporary or permanent, with a permanent impact referring to areas that are paved or otherwise precluded from restoration to a pre-Project state. In desert ecosystems, the definition of permanent impacts must reflect the slow recovery rates of its plant communities on bajadas (alluvial fans with established vegetation communities and cryptogammic crusts on the surface soils (Lovich and Bainbridge 1999). Abella (2010) reviewed additional studies on desert habitat recovery following disturbance, and determined that disturbance of relatively recent geomorphic desert surfaces not containing vegetation (e.g., new deposition of alluvial flows, eolian sand deposits, etc.), primary succession occurs whereby biological communities are initially established. In reviewing studies focused on primary succession, Abella noted that establishment of desert vegetation occurred between 9 to 33 years following disturbance (defined as deposition of alluvium as a result of debris flows), as compared to several studies addressing secondary succession (i.e., recovery from disturbance to established vegetation communities), documenting various rates of recovery after several hundreds of years (Abella 2010). For the purposes of this analysis, all ground disturbance activity is considered a permanent impact due to the long time period for natural reclamation to occur in the desert. Natural recovery rates from disturbance in desert ecosystems depend on the nature and severity of the impact and the autecology of the plant species under consideration for reclamation. For example, creosote bushes can resprout a full canopy within 5 years after damage from heavy vehicle traffic (Gibson et al. 2004 as cited in CEC 2010). Most other species are less robust. For larger-scale projects, severe damage involving vegetation removal and soil disturbance may take from 50 to 300 years for partial recovery with complete ecosystem recovery requiring over 3,000 years (Lovich and Bainbridge 1999).

4.3.1.1 CEQA Significance Criteria

The following thresholds of significance are used to determine whether implementing the Project would result in a significant impact to biological resources pursuant to CEQA. These thresholds of significance are based on Appendix G of the state CEQA Guidelines and the County of Riverside CEQA Environmental Assessment Form. A vegetation resources impact is considered significant if implementation of the proposed Project would do any of the following:

BIO-1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species including species identified in the California Desert Native Plants Act, in local or regional plans, policies, or regulations, or by CDFW or USFWS.

BIO-2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS.

BIO-3) Have a substantial adverse effect on Federal protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to, marshes, vernal pools, and coastal areas) or any state-protected jurisdictional areas not subject to regulation under Section 404 of the CWA through direct removal, filling, hydrological interruption, or other means.

BIO-5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

BIO-6) Conflict with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan.

BIO-7) Substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

4.3.2 Applicant-Proposed Measures

The Applicant proposed the following APMs to address potential effects to vegetation, wetland, and riparian resources. These measures primarily were intended to avoid or reduce potential direct and indirect Project impacts to wildlife resources, specifically to Mojave desert tortoise and its habitat; however, they also would reduce Project impacts to vegetation resources identified in this chapter. APMs for Project impacts to vegetation, wetland, and riparian resources are listed below. The impact analysis assumes that the applicable APMs would be implemented as part of the Project. Therefore, these APMs are to be incorporated into the EICMPP/MMRCP, along with the agency-required mitigation measures.

APM BIO-1. Environmental Inspection and Compliance Monitoring Program and Plan. Prior to the Notice to Proceed, a comprehensive Environmental Inspection and Compliance Monitoring Program and Plan (EICMPP)/Mitigation Monitoring, Reporting, and Compliance Program (MMRCP), covering both construction and operation and maintenance (O&M), will be developed. The EICMPP/MMRCP will incorporate all APMs, agency-required mitigation measures, and agency regulatory requirements for all resources, including biological resources. The EICMPP/MMRCP will ensure that all measures intended to avoid or reduce impacts are appropriately implemented, documented, and reported to the applicable agencies.

A qualified individual will be designated to serve as the Project Environmental Manager. The Environmental Manager will be responsible for the following tasks.

- Development and implementation of the overall Project compliance program;
- Communication and coordination with the applicable regulatory agencies;
- Ensuring compliance with the APMs, agency-required mitigation measures, and various conditions and requirements of permits and approvals;
- Record keeping and reporting required by permits and approvals;

- Ensuring that all applicable environmental plans are up to date;
- Advising management of actual and potential compliance issues; and
- Ensuring that Project planning takes appropriate account of compliance issues in advance.

The EICMPP/MMRCP shall be submitted to the BLM and County for approval prior to the start of ground disturbance and issuance of a County grading permit.

APM BIO-2. Construction-Related Plans. Prior to the Notice to Proceed, the following construction-related plans will be developed, as necessary. These plans have specific objectives that would indirectly help reduce potential adverse effects to biological resources.

- Storm Water Pollution Prevention Plan (discussed in more detail in Sections 2.3.7.1, 2.3.7.9, and Mitigation Measure WATER-1);
- Dust Control Plan (discussed in more detail in Sections 2.3.7.6, 4.2.2, and Mitigation Measure AQ-1);
- Hazardous Materials Management and Emergency Response Plan, including components of a Waste Management Plan (discussed in more detail in Sections 2.3.7.1 and 4.9.3);
- Spill Prevention Control and Countermeasure Plan (discussed in more detail in Sections 2.3.7.1 and 4.9.3);
- Vegetation Resources Management Plan, which would include components for habitat restoration and site reclamation (discussed in more detail in Section 2.3.7.2, and APM BIO-4);
- Worker Environmental Awareness Program (discussed in more detail in Section 2.3.7.5 and Mitigation Measure VEG-6); and
- Fire Prevention Plan (included within the Hazardous Materials Management and Emergency Response, and discussed in more detail in Section 2.3.7.3).

The referenced plans shall be submitted to the BLM and County for approval prior to the start of ground disturbance and issuance of a County grading permit.

APM BIO-3. Construction-Related BMPs. The following general measures shall be implemented during construction, which would assist with reducing potential adverse effects to biological resources,

- Construction activities shall be limited to daylight hours to the extent possible;
- Water required for construction purposes shall only be stored in retention ponds (equipped with wildlife exclusion fencing), or closed containers/structures and shall be transported throughout the site in enclosed water trucks;
- Water sources (such as wells) shall be checked periodically by monitors to ensure they are not creating open water sources through leaking or consistently overfilling trucks;
- All vehicles leaking fuel or other liquids shall be immediately removed to the staging area and repaired – all spills shall be cleaned up promptly and disposed of correctly;
- All construction activities conducted outside the fenced areas shall be monitored by a qualified biological monitor;

- Vegetation removal shall be limited to the smallest area necessary and entirely avoid the desert wash woodland (microphyll woodlands);
- Construction traffic shall remain on existing roads when possible – new roads, passing areas, and turning areas shall be limited to permitted area of direct effect;
- Speed limits on all unimproved areas of the Project site shall be a maximum of 15 miles per hour;
- Trash shall always be contained within raven-proof receptacles and removed from the site frequently, including trash collected in vehicles in the field;
- No dogs or firearms shall be allowed on the Project site during construction; and
- Plant and wildlife collection by Project staff during construction or operation shall be prohibited except as allowed by the Project’s permits, including permits obtained from Riverside County as per the California Desert Native Plants Act.

APM BIO-4: Prior to the Notice to Proceed, a Vegetation Resources Management Plan (VRMP) will be prepared to address impacts to and mitigation measures for special status plants and succulents. The VRMP will be submitted to BLM and the County for review and approval prior to beginning construction. The VRMP will include the following:

- Distribution of target plants within the Project site;
- Criteria for determining whether an individual plant is appropriate for salvage, including, but not limited to, special-status plants and cacti
- Equipment and methods for salvage, propagation, transport, and planting;
- Procedures for marking and flagging target plants during preconstruction clearances surveys;
- Storage and/or pre-planting requirements;
- Proposed transplantation sites;
- A requirement for maintenance of the transplanted individuals, including removal of invasive species and irrigation (if necessary); and
- A requirement for monitoring, including specification of monitoring periods, to determine the percentage of surviving plants each year and to adjust maintenance activities using an adaptive management approach.

APM BIO-5: Prior to the Notice to Proceed, the Applicant will finalize and implement their Draft Integrated Weed Management Plan (IWMP; provided in Appendix J), a component of the VRMP, to control invasive and exotic weeds. The objectives of the IWMP are:

- Identify weed species currently present within the Project components;
- Identify weeds not seen on the Project components that may have the potential to be present in the Project site and have the potential to invade the Project site due to construction activities;
- Identify construction and maintenance activities that may increase the presence of weeds or introduce new weed species on and adjacent to the Project components; and

- Identify and implement proven, new, or improved practices on an ongoing basis to ensure that the presence of weed populations on and adjacent to the Project components shall not increase because of construction and maintenance activities. These steps shall be intended to prevent weeds not currently found on the Project site from becoming established there, and prevent weeds already present on the site from spreading to other areas.
- The Draft IWMP will be modified based on BLM comments on the Draft IWMP. The particular chemicals selected will be adjusted appropriately, including timing of treatment and specific techniques employed.

4.3.3 Direct and Indirect Impacts

4.3.3.1 Alternative 1: Proposed Action

Construction

Native Vegetation Alliances

As shown in Figure 3.3-2, five native vegetation alliances and three other cover types were mapped within the Project area by BLM. *Larrea tridentata* and *Larrea tridentata – Ambrosia dumosa* are the dominant native vegetation alliances on the proposed solar facility, while the gen-tie ROW includes areas of the *Pleuraphis rigida* alliance. A small area of the *Parkinsonia florida – Olneya tesota* alliance is present along the northern Project boundary, adjacent to the NRG Blythe PV facility. An area of the *Chorizanthe rigida – Geraea canescens* Desert Pavement Alliance would not be impacted by any of the Project alternatives.

Construction of the Project would require vegetation removal and ground disturbance within most of the solar facility and much of the gen-tie ROW. Of the 3,770 acre Project area, approximately 3,304 acres, or 88 percent of the site, would have site preparation performed by either mowing or the disk and roll method. Grading, in the form of cut and fill, would be performed on approximately 466 acres, or 12 percent of the site. While only a portion of the vegetation within the gen-tie ROW would be disturbed by installation of towers, this analysis assumes all vegetation within the ROW would be permanently impacted. Construction would also require temporary vegetation removal for construction work areas such as staging and laydown areas. Although temporary work areas would be reclaimed following construction, per Mitigation Measure VEG-8.17, impacts on construction work areas are considered permanent given the long time period for reclamation to occur in desert ecosystems.

Vegetation removal during construction would result in a reduction in the total acres of native vegetation in the Study Area. The acreage of direct impacts is shown in Table 4.3-1. The majority of the impacted vegetation would be the *Larrea tridentata* and *Larrea tridentata – Ambrosia dumosa* alliances, which are very common, and are not considered Special Vegetation Features subject to CMAs under the DRECP.

As shown in Table 4.3-1, none of the Project alternatives would directly impact the *Parkinsonia florida – Olneya tesota* alliance, present along the northern Project boundary. The direct impacts to the *Pleuraphis rigida* alliance, present within the gen-tie corridor, would vary among the alternatives. Alternative 1 would directly impact 40.4 acres of the 171.4 acres of the alliance identified within the Project area.

Table 4.3-1. Comparison of Direct Impacts to Vegetation Alliances

Vegetation Alliance	Alternative 1	Alternative 2	Alternative 3
<i>Chorizanthe rigida</i> - <i>Geraea canescens</i> Desert Pavement Sparsely Vegetated	0 acres	0 acres	0 acres
<i>Larrea tridentata</i> and <i>Larrea tridentata</i> – <i>Ambrosia dumosa</i>	3,575 acres	2,605 acres	1,870 acres
<i>Parkinsonia florida</i> - <i>Olneya tesota</i>	0 acres	0 acres	0 acres
<i>Pleuraphis rigida</i>	40.4 acres	2.3 acres	2.3 acres

Implementation of APM BIO-3 (Construction-Related BMPs) would minimize the direct loss of native and sensitive vegetation by limiting impacts to only areas that need to be disturbed. Related measures include Mitigation Measures VEG-8 (Avoidance of Biological Resources During Construction), VEG-9 (Special-Status Plant measures), and VEG-10 (Measures for Riparian Habitat and State Waters), which require biological construction monitoring, and avoiding and minimizing construction-related impacts to vegetation, jurisdictional waters, and special-status species. Additionally, implementation of Mitigation Measures WIL-4, WIL-9, WIL-10, and WIL-12 would offset the habitat loss through habitat compensation associated with impacts to listed and otherwise special-status wildlife species.

Potential indirect impacts to vegetation resulting from construction activities include the introduction and spread of invasive nonnative plant species such as Sahara mustard. Seeds of nonnative species from outside sources may be inadvertently introduced to native vegetation areas surrounding the Project via vehicles, people, and equipment. Ground disturbance associated with construction activities could promote the establishment and spread of opportunistic nonnative plants. Additionally, wildfires caused by construction in desert habitats are rare but may occur, and nonnative plant species often become established in burned areas. Once introduced, these species often out-compete native species for resources resulting in a reduction in growth, future dispersal, and recruitment of native species. The spread of invasive nonnative species reduces native plant diversity and abundance, eventually degrading the structure and function of vegetation alliances, and potentially reducing the food supply for animal species of management concern such as the Mojave desert tortoise. The potential introduction of invasive nonnative plant species is considered a permanent indirect impact as total eradication of invasive plants is rarely achieved. Implementation of APM BIO-3 (Construction-Related BMPs) would minimize the indirect loss of native and sensitive vegetation by limiting impacts to only areas that must be disturbed to complete construction. Implementation of APM BIO-5 (Integrated Weed Management Plan) would mitigate the indirect impacts from invasive weeds by requiring the finalization and implementation of an Integrated Weed Management Plan, thereby minimizing the effects of invasive species on vegetation and special-status plant species. Related measures include Mitigation Measures VEG-8 (Avoidance of Biological Resources During Construction), VEG-9 (Special-Status Plant measures), and VEG-10 (Measures for Riparian Habitat and State Waters), which require biological construction monitoring, and avoiding and minimizing construction-related impacts to vegetation, jurisdictional waters, and special-status species.

Dust generated from vehicle travel on dirt access roads and other ground-disturbing activities could also indirectly impact native vegetation. Accumulation of dust on plants can reduce the rates of metabolic processes such as photosynthesis and respiration. Dust deposition during the 25- to 48-

month construction period could degrade native vegetation by reducing plant growth rates, increasing plant susceptibility to disease, reducing reproductive capacity, or reducing ability to compete with nonnative species. Construction-generated dust is considered a temporary indirect impact. Implementation of APM BIO-2 (Construction-Related Plans) would require the preparation and implementation of a Dust Control Plan, minimizing indirect dust impacts on native vegetation and plant species.

Construction activities could also result in changes to existing hydrology regimes and geomorphic processes. Vegetation clearing, grading, and compaction associated with Project construction could increase the rate, volume, and sediment load of storm water runoff traveling offsite. Changes in hydrology could indirectly impact surface-water-dependent plant species, and could result in increased erosion and rates of scouring the desert habitats surrounding the Project site, including *Parkinsonia florida-Olneya tesota* alliance. Changes to existing hydrology regimes and geomorphic processes are considered permanent indirect impacts. Implementation of APM BIO-2 (Construction-Related Plans) would require the preparation and implementation of a Storm Water Pollution Prevention Plan (as also required under Mitigation Measure WATER-1), which would minimize any construction-related erosion.

Finally, removal of vegetation within the Study Area would lead to fragmentation of existing habitats. Habitat fragmentation results in isolated patches of formerly connected habitats which usually contain fewer species, have proportionally larger perimeters (making them more vulnerable to edge effects), and tend to be more vulnerable to adverse stochastic (random) events such as fires and floods. Habitat fragmentation is considered a permanent indirect impact. Implementation of APM BIO-3 (Construction-Related BMPs) would minimize the direct and indirect loss of native and sensitive vegetation by limiting impacts to only areas that need to be disturbed, thereby minimizing habitat fragmentation. Related measures include Mitigation Measures VEG-8 (Avoidance of Biological Resources During Construction), VEG-9 (Special-Status Plant measures), and VEG-10 (Measures for Riparian Habitat and State Waters), which require biological construction monitoring, and avoiding and minimizing construction-related impacts to vegetation, jurisdictional waters, and special-status species.

Jurisdictional Waters and Wetlands

The state jurisdictional watercourse areas, along with the footprints of the action alternatives, are shown in Figure 4.3-1. The Alternative 1 footprint encompasses approximately 26.2 acres of watercourses, including 6.3 acres of FP1 and 19.4 acres of FP2, and abandoned channels for which CDFW has not yet made a determination of jurisdiction. If these are ultimately determined by CDFW to be dormant channels, or some other form of jurisdictional channel, avoidance or mitigation will be required. Mitigation measure VEG-10 (Measures for Riparian Habitat and State Waters) requires compensation for impacts, at a ratio to be determined by CDFW. Both areas are situated on the edge of the Project, and could potentially be avoided by detailed Project design. If the areas are avoided as a result of final design, no impacts would occur, and no mitigation would be required. If final design shows that the areas would be impacted, overlays of permanent and temporary construction areas, volumes of soil disturbance, and restoration and mitigation plans would be provided to CDFW as part of the Streambed Alteration Agreement application.

Table 4.3-2. Comparison of Direct Impacts to CDFW Jurisdictional Watercourse

CDFW Jurisdictional Watercourse	Alternative 1 (acres)	Alternative 2 (acres)	Alternative 3 (acres)
Watercourse FP1 (and Associated Dormant Channels) ¹	6.3	0	0
Watercourse FP2 (and Associated Dormant Channels)	19.4	0	0
Watercourse FP3	0.04	0	0
Abandoned Channels²	0.46	0.39	0.36
Total	26.2	0.39	0.36

1 – The FP1 watercourse is coincident with the *Parkinsonia florida* – *Olneya tesota* alliance, and is also mapped as a critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems by Kenney (2017).

2 - Abandoned channels are considered to be potentially under CDFW jurisdiction at this time. A final determination of jurisdiction will be made by CDFW through the Streambed Alteration Permit process.

The Federal jurisdictional delineation identified 41,932 linear feet of potentially Federally jurisdictional areas, consisting of either ephemeral riverine intermittent streambed (40,349 linear feet) or excavated ephemeral riverine intermittent streambed (1,583 linear feet). However, the Corps determined all of these areas to be intrastate isolated waters with no apparent interstate or foreign commerce connection, and are therefore excluded from Clean Water Act jurisdiction.

Special-Status Plants

Six special-status plant species were documented during rare plant surveys conducted on BLM land in Fall 2012 (September 11 to 19, 2012), Spring 2013 (March 18 to 30, 2013), and Spring 2017 (May 9 to 14, 2017), and on the private inholding in Spring 2015 (March 10 to 12, 2015). None of the species documented are Federally- or state-listed under FESA or CESA; therefore, impacts to listed special-status species are not anticipated.

Potential direct impacts to non-listed special-status plant species during construction activities include removal or accidental crushing of plants, bulbs, or seeds. The numbers of existing individuals of each non-listed special-status plant species that would be removed during construction of Alternative 1 are presented in Table 4.3-3. Table 4.3-3 also includes the numbers of individuals that would be removed under the other Project alternatives to facilitate comparison.

One of the species that would be directly impacted, Harwood’s eriastrum, is a BLM Sensitive species. Alternative 1 would directly impact 510 documented occurrences of the Harwood’s eriastrum, including 433 within the solar facility and 77 along the gen-tie line. In addition to the occurrences, Table 4.3-3 also shows the acreage of direct impact to occupied and potential Harwood’s eriastrum habitat. Within 250 feet of these documented occurrences, Alternative 1 would directly impact 110 acres of occupied habitat. As shown in Figure 3.3-8, the remainder of the Project area was identified as suitable habitat in the DRECP model, and is therefore considered to be potential habitat. Alternative 1 would directly impact 3,660 acres of this potential habitat.

There is a chance that additional special-status species could emerge within the Alternative 1 footprint prior to construction (especially annual species). If present, these species would be directly impacted as well. Implementation of APM BIO-4 (Vegetation Resources Management Plan), and Mitigation Measures VEG-8.1, VEG-9(A), and VEG-9(B), would require identification and avoidance of occurrences of special-status plants, where practicable.

Potential indirect effects to special-status plants are similar to those described above for native vegetation. Most special-status plant species are threatened by the introduction and spread of invasive nonnative plant species. Invasive nonnative plant species outcompete and displace special-status species, thereby resulting in population declines. Construction-generated dust can adversely affect special-status plants by reducing the rates of metabolic processes, such as photosynthesis and respiration. Alteration of hydrology regimes and geomorphic processes could limit resources for special-status plant species in certain habitats such as areas of the *Parkinsonia florida-Olneya tesota* alliance and sand dunes. Lastly, fragmentation of remaining populations of special-status plant species could disrupt gene flow, and remaining populations would be more vulnerable to adverse stochastic events and edge effects such as invasion of nonnative species. Implementation of APM BIO-5 (Integrated Weed Management Plan) would mitigate the indirect impacts from invasive weeds by requiring the finalization and implementation of an Integrated Weed Management Plan, thereby minimizing disruption of the natural native species population dynamics.

Potential indirect effects to special-status plant species could also occur if the Project were to interfere with the flow of sediment or moisture to their habitat. Habitat for some of the special-status plant species, including the Harwood’s eriastrum, is associated with sand deposits, which are present in both alluvial and eolian deposits in the Project area. The floodplain area designated as FP1, shown in Figure 4.3-1, roughly corresponds to the *Parkinsonia florida-Olneya tesota* vegetation alliance mapped by BLM, and is also mapped as a ponding area that is critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems by Kenney (2017). As shown in Tables 4.3-1 and 4.3-2, Alternative 1 would not directly impact the *Parkinsonia florida-Olneya tesota* vegetation alliance, but would directly impact the 6.3 acres of the FP1 watercourse. This direct impact could affect the function of the area as a sand source and stabilizing moisture for sand dune systems, resulting in an indirect impact to occupied or potential habitat for the Harwood’s eriastrum.

Table 4.3-3. Summary of Direct Impacts to Special-Status Plant Species

Special Status Plants by Project Component		Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action
Solar Plant Site					
Abrams' Spurge	Individual Occurrences	2,021	1	0	0
Desert Unicorn-Plant	Individual Occurrences	584	300	315	0
Harwood's Eriastrum	Individual Occurrences	433	0	0	0
	Occupied Habitat Acreage ¹	80 acres	1 acres	0 acres	0 acres
	Potential Habitat Acreage ²	3,634 acres	2,697 acres	1,963 acres	0 acres
Harwood's Milkvetch	Individual Occurrences	23,078	22,165	22,165	0
Ribbed Cryptantha	Individual Occurrences	17,032	0	0	0
Utah Vine Milkweed	Individual Occurrences	0	0	0	0

Table 4.3-3. Summary of Direct Impacts to Special-Status Plant Species

Special Status Plants by Project Component		Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action
Gen-Tie Line, Communications Line, and Temporary Work Areas Outside of Fence					
Abrams' Spurge	Individual Occurrences	0	0	0	0
Desert Unicorn-Plant	Individual Occurrences	0	0	0	0
Harwood's Eriastrum	Individual Occurrences	77	202	202	0
	Occupied Habitat Acreage ¹	30 acres	18 acres	18 acres	0 acres
	Potential Habitat Acreage ²	26 acres	52 acres	52 acres	0 acres
Harwood's Milkvetch	Individual Occurrences	0	0	0	0
Ribbed Cryptantha	Individual Occurrences	1,127	4,146	4,156	0
Utah Vine Milkweed	Individual Occurrences	0	0	0	0

1 – Occupied Harwood's eriastrum habitat based on 250 foot buffer surrounding individual occurrences. This buffer was estimated for the Palen Solar Project, based on variable numbers of occurrences of the species identified through multi-year surveys. This indicated that a viable seedbank persists near areas of previously documented occurrences, even if no occurrences are found during surveys in a given year.

2 – Potential Harwood's eriastrum habitat based on modeled suitable habitat that is not occupied.

Cacti

Three species of cactus were documented within the Study Area during rare plant surveys: silver cholla (106 individuals documented), common fish hook cactus (11 individuals documented), and barrel cactus (1 individual documented). None of these species are considered special-status species. Species of yucca were not documented during rare plant surveys, and no cacti were documented on the 160-acre private inholding portion of the Study Area. Direct and indirect impacts to the cacti are identical to those described above for special-status plant species (i.e., direct removal/crushing, competition from invasive nonnative species, dust, alteration of hydrology regimes and geomorphic processes, and fragmentation of populations). The exact locations of cacti found on-site were not recorded. However, implementation of APM BIO-4 (Vegetation Resources Management Plan) would require the salvage and relocation of all cacti that would otherwise be impacted by Alternative 1.

Operation and Maintenance

Native Vegetation Alliances

Operation and maintenance of Alternative 1 would not result in direct impacts to native and sensitive vegetation alliances beyond those described above for construction. However, operation and maintenance would result in indirect impacts to native and sensitive vegetation alliances. As

discussed above for construction, indirect impacts to vegetation alliances could occur if the Project were to interrupt the movement of sand across the Project area.

Invasive nonnative plant species are opportunistic and often establish on disturbed soils, such as those along access roads, within transmission line corridors, and within solar facilities where areas of exposed bare ground are maintained. Vehicles and crews present during operation and maintenance could inadvertently introduce seeds and/or parts of invasive species, thus facilitating their spread into intact vegetation alliances. Implementation of APM BIO-5 (Integrated Weed Management Plan) would mitigate the impacts associated with the spread of invasive weeds by requiring the finalization and implementation of an Integrated Weed Management Plan, thereby minimizing the effects of invasive weeds on native and/or sensitive vegetation alliances.

Dust generated from vehicle travel on dirt access roads during operation and maintenance could also indirectly impact native vegetation. As discussed above for construction, accumulation of dust on plants can reduce the rates of metabolic processes such as photosynthesis and respiration thereby resulting in degradation of vegetation alliances. Implementation of APM BIO-2 (Construction-Related Plans) would require the preparation and implementation of a Dust Control Plan, minimizing indirect dust impacts on native vegetation and plant species.

Once constructed, existing hydrology regimes and geomorphic processes would likely be altered for the duration of ROW operation. The compacted and developed site could increase the rate, volume, and sediment load of storm water runoff traveling offsite. Additionally, the developed site could result in disruption of geomorphic processes (e.g., sand transportation) essential to the function and integrity of certain desert habitats and species (e.g., Mojave fringe-toed lizard). Implementation of APM BIO-2 (Construction-Related Plans) and Mitigation Measure WATER-1 would require the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which would minimize any construction-related erosion and changes in site hydrology.

Indirect impacts could occur if the Project were to directly impact sand and moisture sources, or were to affect wind patterns. Adverse impacts to Coachella Valley fringe-toed lizard habitat due to interference with sand sources were documented by Griffiths et al. (2002). Human alterations to the episodic flow from Whitewater River and Morongo Creek in Riverside County near Palm Springs have included channelization, groundwater recharge facilities, gravel mining, roads, railroads, and residential development. These changes have degraded eolian sand dune habitat by redirecting sand to other locations and thereby reducing the volume of wind-blown sand into habitat for the Coachella Valley fringe-toed lizard (Griffiths et al. 2002).

Although Griffiths et al. (2002) documented the relationship between modifications to fluvial depositional areas and degradation of downwind eolian sand habitat, this relationship between sand sources, the Project, and eolian sand habitat does not appear to be the same in the Project area. The onsite sand deposits and habitat are primarily located on the western, upstream portion of the Project area, and the Project facilities are located downstream of both the source areas and the occupied habitat. The Project is not likely to affect fluvial deposition within these upstream areas to the west.

Although the Project is not likely to affect fluvial transport of sand to adjacent vegetation alliances or known occupied habitat west of the site, it could potentially affect eolian transport of sand to these areas. As discussed above for construction, the floodplain area designated as FP1 has been mapped as a ponding area that is critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems by Kenney (2017). Alternative 1 would directly impact

6.3 acres of this area. The significance of this area or other areas on the Project site, in supporting vegetation alliances through acting as a sand and moisture source is unknown, but it is possible that long-term occupation of the land area by a solar facility could affect this function of the area, and thus result in an indirect impact to vegetation alliances.

An indirect impact to vegetation alliances could also occur if the occupation of the land area by the project could potentially impede future expansion or migration of onsite sand deposits. Potter and Weigand (2016) documented that inactive areas within dune fields can become active within a very short timeframe, such as within the timeframe of the life of the Project. Although Kenney (2017) concludes that dunes within the Project area are inactive, the fact that inactive areas within Palen Dunes underwent substantial changes within a short timeframe indicates that such changes in the Project area are possible. If the onsite dune systems were to expand within the timeframe of the Project, it is possible that vegetation alliances associated with the systems could also expand. Modification of wind patterns associated with Project development could either hinder or facilitate this expansion.

Indirect impacts to native vegetation alliances could also occur due to changes in atmospheric conditions in and near the solar array, known as the “heat island” effect. If the presence of the solar array were to result in an increase in ambient temperatures in adjacent native vegetation, the change in temperature could modify moisture conditions that support vegetation growth and/or stability of sand deposits. Barron-Gafford et al. (2016) report that ambient temperatures over a solar PV plant were regularly 3 to 4 °C (about 5 to 7 °F) warmer than wildlands at night. However, other studies indicate local cooling at solar PV sites, possibly depending on surface reflectivity (Hu et al., 2016; Nguyen et al. 2017). Investigation undertaken by NASA Ames Research Center (Dr. Christopher Potter) on behalf of the BLM has shown that utility-scale solar installation actually induced microclimate cooling in the immediate vicinity of facilities already in operation in the Riverside East DFA. This cooling begins from the first day of operation. The energy that would normally be reflected back to space as heat is absorbed into the PV panels and transmitted away as electrical energy. If there is any heat island effect, it is unknown whether the elevated temperature would extend laterally beyond the solar field or, if so, to the ground surface. If a heat island effect were to occur at the DQSP site, and if it extended laterally to adjacent vegetation, then it could affect dry wash woodland vegetation and habitat. However, the potential site-specific result of this effect, if any, is unknown.

Special-Status Plants

Operation and maintenance of Alternative 1 would not result in direct impacts to special-status plant species beyond those described above for construction. However, operation and maintenance could result in indirect impacts to special-status plant species occurring offsite. Potential indirect effects to special-status plants resulting from operation and maintenance are similar to those described above for native vegetation alliances.

Operation and maintenance could result in the introduction and spread of invasive nonnative plant species, which could threaten the survival of special-status plant populations surrounding the developed site. Implementation of APM BIO-5 (Integrated Weed Management Plan) would mitigate the indirect impacts from invasive weeds by requiring the finalization and implementation of an Integrated Weed Management Plan, thereby minimizing the effects of invasive species on special-status plants.

The potential for operation of the Project to indirectly impact habitat for the Harwood's eriastrum is similar to the analysis of indirect impacts to vegetation alliances, discussed above. As demonstrated by Potter and Weigand (2016) at Palen dunes, there is the potential for inactive areas within dune fields to become active within a very short timeframe. If this were to occur, then the occupation of the land area by a solar project could either hinder or facilitate expansion of occupied Harwood's eriastrum habitat. As the Alternative situated closest to the known occupied habitat for the Harwood's eriastrum, the potential for these indirect impacts to occur is higher under Alternative 1 than Alternatives 2 or 3.

Cacti

Operation and maintenance of Alternative 1 would not result in direct impacts to special-status plant species beyond those described above for construction. Indirect impacts to the cacti resulting from operation and maintenance are identical to those described above for special-status plant species. Implementation of APM BIO-5 (Integrated Weed Management Plan) would mitigate the indirect impacts from invasive weeds by requiring the finalization and implementation of an Integrated Weed Management Plan, thereby minimizing the effects of invasive species on cacti.

Decommissioning

Decommissioning of Alternative 1 would generally be considered beneficial to vegetation resources given that development would be removed and restoration of the site would be possible. Decommissioning activities are anticipated to only directly affect areas that were previously disturbed during installation of the facilities. Thus, the direct removal of native vegetation alliances, jurisdictional waters and wetlands, special-status plants, and cacti is not anticipated during decommissioning activities. It is expected that indirect impacts during decommissioning would be similar to those described for construction of Alternative 1. Potential indirect impacts to vegetation alliances, jurisdictional waters and wetlands, special-status plant populations, and cacti include generation of dust and colonization of the site by invasive nonnative plant species during and following site decommissioning. Implementation of APMs BIO-2 (Construction-Related Plans) and BIO-5 (Integrated Weed Management Plan) would require the preparation and implementation of a Dust Control Plan and an Integrated Weed Management Plan, respectively. Effective implementation of these plans would minimize the effects on botanical and wetland resources from dust and invasive species during decommissioning.

4.3.3.2 Alternative 2: Resource Avoidance Alternative

As shown in Table 4.3-1, the types of impacts that would occur under the Resource Avoidance Alternative would result in the direct and permanent loss of all special-status plants and vegetation alliances within the disturbance footprint, and indirect impacts to vegetation resources would be similar to those discussed for the Proposed Action. Alternative 2 would not directly impact the *Parkinsonia florida* – *Olneya tesota* alliance identified within the Project area. Alternative 2 would directly impact 2.3 acres of the 171.4 acres of the *Pleuraphis rigida* alliance identified within the Project area. This is a reduction from the 40 acres of the *Pleuraphis rigida* alliance associated with Alternative 1. Similar to Alternative 1, implementation of APMs BIO-2 (Construction-Related Plans), BIO-3 (Construction-Related BMPs), and BIO-5 (Integrated Weed Management Plan), and Mitigation Measures VEG-8 (Avoidance of Biological Resources During Construction),

VEG-10 (Measures for Riparian Habitat and State Waters), WIL-4, WIL-9, WIL-10, and WIL-12 would minimize the direct and indirect impacts to vegetation alliances.

The state jurisdictional watercourse areas, along with the footprints of the action alternatives, are shown in Figure 4.3-1. Table 4.3-2 provides the acreages of FP1, FP2, and FP3 encompassed by the Proposed Action and Alternatives 2 and 3. The Alternative 2 footprint completely avoids the FP1 and FP2 watercourses and their associated dormant channels. However, the Alternative 2 footprint directly impacts 0.39 acres of abandoned channels for which CDFW has not yet made a determination of jurisdiction. If these are ultimately determined by CDFW to be dormant channels, or some other form of jurisdictional channel, avoidance or mitigation will be required. Mitigation measure VEG-10 (Measures for Riparian Habitat and State Waters) requires compensation for impacts, at a ratio to be determined by CDFW.

Anticipated direct impacts to special-status plants of Alternative 2 are presented in Table 4.3-3. Under this alternative, impacts would occur to the same special-status plant species as identified for Alternative 1, but with an overall reduction in the number of individuals and acreage of habitat impacted for each species type. The Resource Avoidance Alternative would result in reduced impacts to Abrams' spurge (a decreased impact of approximately 95 percent, relative to the Proposed Action), desert unicorn-plant (a decreased in impact by 37 percent), Harwood's eriastrum (a 60 percent decrease), Harwood's milkvetch (a 4.0 percent decrease), and ribbed cryptantha (a 77 percent decrease).

Alternative 2 would directly impact 202 documented occurrences of the Harwood's eriastrum, all associated with the gen-tie line. In addition to the occurrences, Table 4.3-3 also shows the acreage of direct impact to occupied and potential Harwood's eriastrum habitat. Within 250 feet of these documented occurrences, Alternative 2 would directly impact 19.6 acres of occupied habitat. As shown in Figure 3.3-8, the remainder of the Project area was identified as suitable habitat in the DRECP model, and is therefore considered to be potential habitat. Alternative 2 would directly impact 2,748 acres of this potential habitat.

Potential indirect effects to special-status plant species could also occur if the Project were to interfere with the flow of sediment or moisture to their habitat. Habitat for some of the special-status plant species, including the Harwood's eriastrum, is associated with sand deposits, which are present in both alluvial and eolian deposits in the Project area. The floodplain area designated as FP1, shown in Figure 4.3-1, roughly corresponds to the *Parkinsonia florida-Olneya tesota* vegetation alliance mapped by BLM, and is also identified as a ponding area that is critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems by Kenney (2017). As shown in Tables 4.3-1 and 4.3-2, Alternative 2 would not directly impact the *Parkinsonia florida-Olneya tesota* vegetation alliance or the FP1 watercourse. For comparison, Alternative 1 would directly impact 6.3 acres of the FP1 watercourse.

Similar to Alternative 1, implementation of APMs BIO-4 (Vegetation Resources Management Plan) and BIO-5 (Integrated Weed Management Plan), and Mitigation Measure VEG-9 (Special Status Plant measures) would avoid and minimize impacts to special-status plant species.

4.3.3.3 Alternative 3: Reduced Project Alternative

As shown on Table 4.3-1, the types of impacts that would occur under the Reduced Project Alternative would result in the direct and permanent loss of all special-status plants and vegetation alliances within the disturbance footprint, and indirect impacts to vegetation resources would be

similar to those discussed for the Proposed Action. Alternative 3 would not directly impact the *Parkinsonia florida* – *Olneya tesota* alliance identified within the Project area. Alternative 3 would directly impact 2.3 acres of the 171.4 acres of the *Pleuraphis rigida* alliance identified within the Project area. This is a reduction from the 40 acres of the *Pleuraphis rigida* alliance associated with Alternative 1. Similar to Alternative 1 and Alternative 2, implementation of APMs BIO-2 (Construction-Related Plans), BIO-3 (Construction-Related BMPs), and BIO-5 (Integrated Weed Management Plan), and Mitigation Measures VEG-8 (Avoidance of Biological Resources During Construction), VEG-10 (Measures for Riparian Habitat and State Waters), WIL-4, WIL-9, WIL-10, and WIL-12 would minimize the direct and indirect impacts to vegetation alliances.

The state jurisdictional watercourse areas, along with the footprints of the action alternatives, are shown in Figure 4.3-1. Table 4.3-2 provides the acreages of FP1, FP2, and FP3 encompassed by the Proposed Action and Alternatives 2 and 3. The Alternative 3 footprint completely avoids the FP1 and FP2 watercourses and their associated dormant channels. However, the Alternative 3 footprint directly impacts 0.36 acres of abandoned channels for which CDFW has not yet made a determination of jurisdiction. If these are ultimately determined by CDFW to be dormant channels, or some other form of jurisdictional channel, avoidance or mitigation will be required. Mitigation measure VEG-10 (Measures for Riparian Habitat and State Waters) requires compensation for impacts, at a ratio to be determined by CDFW.

Anticipated direct impacts to special-status plants of Alternative 3 are presented in Table 4.3-3. Under this alternative, impacts would occur to the same special-status plant species as identified for Alternative 1, but with an overall reduction in the number of individuals impacted for each species type. The Reduced Project Alternative would result in reduced impacts to Abrams' spurge (a decreased impact of 100 percent, relative to the Proposed Action), desert unicorn-plant (a decrease in impact by 40 percent), Harwood's eriastrum (a 60 percent decrease), Harwood's milkvetch (a 4 percent decrease), and ribbed crypnantha (a 77 percent decrease).

Alternative 3 would directly impact 202 documented occurrences of the Harwood's eriastrum, all associated with the gen-tie line. In addition to the occurrences, Table 4.3-3 also shows the acreage of direct impact to occupied and potential Harwood's eriastrum habitat. Within 250 feet of these documented occurrences, Alternative 3 would directly impact 18.2 acres of occupied habitat. As shown in Figure 3.3-8, the remainder of the Project area was identified as suitable habitat in the DRECP model, and is therefore considered to be potential habitat. Alternative 3 would directly impact 2,015 acres of this potential habitat.

Potential indirect effects to special-status plant species could also occur if the Project were to interfere with the flow of sediment or moisture to their habitat. Habitat for some of the special-status plant species, including the Harwood's eriastrum, is associated with sand deposits, which are present in both alluvial and eolian deposits in the Project area. The floodplain area designated as FP1, shown in Figure 4.3-1, roughly corresponds to the *Parkinsonia florida*-*Olneya tesota* vegetation alliance mapped by BLM, and is also identified as a ponding area that is critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems by Kenney (2017). As shown in Tables 4.3-1 and 4.3-2, Alternative 3 would not directly impact the *Parkinsonia florida*-*Olneya tesota* vegetation alliance or the FP1 watercourse. For comparison, Alternative 1 would directly impact 6.3 acres of the FP1 watercourse.

Similar to Alternative 1 and Alternative 2, implementation of APMs BIO-4 (Vegetation Resources Management Plan) and BIO-5 (Integrated Weed Management Plan), and Mitigation Measure

VEG-9 (Special Status Plant measures) would avoid and minimize impacts to special-status plant species.

4.3.4 Application of CEQA Significance Thresholds

For the purposes of CEQA compliance, the significance of each identified impact of Alternative 1 has been determined. The CEQA Lead Agency is responsible for determining whether an impact is significant and is required to adopt mitigation measures to minimize or avoid each significant impact. BIO-4 is not applicable to vegetation resources; therefore, this threshold is not addressed in this section. BIO-4, along with other CEQA thresholds applicable to wildlife resources are addressed in Section 4.4, *Biological Resources – Wildlife*.

BIO-1) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS?

Construction, operation and maintenance, and decommissioning of Alternative 1, 2, and 3 would result in direct and indirect impacts to the following non-listed special-status species: Abrams' spurge, desert unicorn-plant, Harwood's eriastrum, Harwood's milkvetch, and ribbed cryptantha. Direct impacts to these species resulting from Alternatives 1, 2, and 3 are quantified in Table 4.3-3. Potential direct and indirect impacts to special-status plant species would be less than significant with implementation of APMs BIO-1 (Environmental Inspection and Compliance Monitoring Program and Plan), BIO-3 (Construction-Related BMPs), BIO-4 (Vegetation Resources Management Plan), and BIO-5 (Integrated Weed Management Plan), as well as Mitigation Measures VEG-1 through VEG-5 (requirements for biological monitoring), and VEG-6 through VEG-10 (various resource protection plans and impact avoidance measures).

BIO-2) Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS?

As shown in Table 4.3-1, the Project alternatives would not directly impact the *Parkinsonia florida* – *Olneya tesota* alliance, which is identified in DRECP as microphyll woodland. There would be no impacts.

BIO-3) Would the Project have a substantial adverse effect on Federal protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to, marshes, vernal pools, and coastal areas) or any state-protected jurisdictional areas not subject to regulation under Section 404 of the CWA through direct removal, filling, hydrological interruption, or other means?

The Federal jurisdictional delineation indicated that potential waters were isolated, therefore not under CWA jurisdiction. The Alternative 1 footprint encompasses approximately 26.2 acres of watercourses, including 6.3 acres of FP1 and 19.4 acres of FP2, potentially jurisdictional dormant channels within FP2, and abandoned channels for which CDFW has not yet made a determination of jurisdiction. If these are ultimately determined by CDFW to be dormant channels, or some other form of jurisdictional channel, avoidance or mitigation will be required. The footprints for Alternatives 2 and 3 completely avoid the FP1 and FP2 watercourses and their associated dormant

channels, but directly impact 0.39 and 0.36 acres of abandoned channels for which CDFW has not yet made a determination of jurisdiction. Mitigation measure VEG-10 (Measures for Riparian Habitat and State Waters) requires compensation for impacts, at a ratio to be determined by CDFW. Both areas are situated on the edge of the Project, and could potentially be avoided by detailed Project design. If the areas are avoided as a result of final design, no impacts would occur, and no mitigation would be required. If final design shows that the areas would be impacted, overlays of permanent and temporary construction areas, volumes of soil disturbance, and restoration and mitigation plans would be provided to CDFW as part of the Streambed Alteration Agreement application. Impacts would be less than significant with mitigation through VEG-10.

BIO-5) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Alternatives 1, 2, or 3 would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Regional resource planning documents prepared by Federal, state, and local agencies were reviewed, including the CDCA Plan, the NECO amendment to the CDCA Plan, the Riverside County General Plan, and USFWS Recovery Plans. These documents were reviewed to confirm that the proposed Project would not conflict with and would have no impact on any local policies or ordinances protecting biological resources.

BIO-6) Would the Project conflict with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan?

Alternatives 1, 2, or 3 would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. This is because no conservation plans (local, regional, or state) encompass the Study Area. Alternatives 1, 2, or 3 would have no impact on adopted habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans.

BIO-7) Would the Project substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

Alternatives 1, 2, and 3 would not substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species. Based on the available data specific to the Project area and the surrounding region (project-specific surveys, state and Federal database records analysis, and coordination with the resource agencies), no rare or threatened plant species would be impacted or threatened by Alternatives 1, 2, or 3. While the associated impacts to 3,575 acres of the *Larrea tridentata* and *Larrea tridentata*-*Ambrosia dumosa* alliances and 40 acres of the *Pleuraphis rigida* alliance would also impact portions of the various plant species populations that occur within the development footprint of the solar facility and gen-tie line under Alternative 1, those affected vegetation alliances and plant species have relatively wide distributions throughout the Sonoran

desert, and would not be eliminated or reduced in numbers below self-sustaining levels. Implementation of the APMs and Mitigation Measures discussed previously for impacts to vegetation alliances would also provide impact avoidance, minimization, and compensation measures to offset any population-level impacts to plant species. Impacts would be less than significant. Additional analysis of CEQA Significance Threshold BIO-7 is provided for wildlife resources in Section 4.4.

Impacts to 2,605 acres of the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances and 2.3 acres of the *Pleuraphis rigida* alliance associated with Alternative 2 are less than what would occur under Alternative 1; impacts to 1,870 acres of the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances and 2.3 acres of the *Pleuraphis rigida* alliance associated with Alternative 3 are less than what would occur under Alternative 1. As such, those affected vegetation alliances and plant species would not be eliminated or reduced in numbers below self-sustaining levels. Implementation of the APMs and the Mitigation Measures discussed previously for impacts to vegetation alliances would also provide impact avoidance, minimization, and compensation measures to offset any population-level impacts to plant species. Impacts would be less than significant. Additional analysis of CEQA Significance Threshold BIO-7 is provided for wildlife resources in Section 4.4.

4.3.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.3 would be maintained. No vegetation alliances, plant species dependent upon those habitats, or jurisdictional waters would be lost through development of the Project area, no disturbance of site soils would occur, and no gen-tie line would be constructed. Therefore, Alternative 4 would not result in any impacts associated with natural vegetation alliances.

4.3.6 Cumulative Impacts

This cumulative impact analysis evaluates the effects of existing and reasonably foreseeable future projects that threaten plant alliances on the Palo Verde Mesa and adjacent Palo Verde Valley. This scale was selected for the analysis of cumulative effects to better understand the contribution of local projects to effects on sensitive resources near the Project site. In addition to construction-related impacts, the Project would have ongoing operational impacts to biological resources. Therefore the temporal scope of the cumulative effects analysis for sensitive vegetation alliances includes the construction, operation and maintenance, and decommissioning phases of the Project.

Existing conditions within the area of cumulative effects analysis, described in Section 3.3, reflect a combination of natural conditions, as well as the effects of past and present actions. Urban, residential, and agricultural development in the Blythe area has resulted in removal of natural desert vegetation in the Palo Verde Valley and on Palo Verde Mesa. In recent years, commercial-scale solar power projects, identified in Section 4.1 and concentrated primarily on the Palo Verde Mesa north and south of I-10 between Wiley's Well Road and the eastern edge of the mesa, have contributed to this cumulative impact. Some projects, such as the BMSP and the private land

portion of the DQSP, are proposed on abandoned agricultural lands, so do not contribute additional displacement of native vegetation alliances. Other renewable energy projects, including the Modified BSPP, MSEP, Palen, and RE Crimson projects, as well as the majority of land areas associated with the DQSP, are proposed/being developed on previously undisturbed land on the Palo Verde Mesa, and therefore do contribute to cumulative impacts. Development of these projects could contribute to habitat loss and fragmentation and barriers to gene flow. The introduction of nonnative plant species has also contributed to habitat degradation, population declines, and range contractions for many special-status plant species (Boarman 2002). Combined with the effects of historical grazing and military training, and fragmentation of habitat from highway and aqueduct construction, the renewable energy projects have the potential to further reduce and degrade native plant populations. Although these projects have undergone, or would undergo, environmental permitting and analysis under NEPA, CEQA, and/or other Federal and state laws to evaluate project-level environmental impacts, even after mitigation of project-level impacts, these projects would collectively contribute to impacts on sensitive resources. In the context of this large-scale habitat loss, the Project would contribute to the cumulative loss and degradation of habitat for desert plants in the cumulative analysis area.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

Native Vegetation Alliances

The development of numerous large-scale projects, such as the other solar generation facilities identified in Tables 4.1-1 and 4.1-2, would result in the long-term conversion of desert habitat to industrial and commercial uses. Table 4.3-4 presents the total acreage of vegetation communities within the geographic scope and the cumulative impacts on each community type from existing and foreseeable future projects. These acreages were calculated using the list of cumulative projects that are located in the Palo Verde Valley and lower Chuckwalla Valley. Note that most previous projects have presented their analyses in terms of vegetation communities, while the current Project is evaluated as vegetation alliances. Therefore, the approximate correlations of the communities and the alliances are presented.

A total loss of 8.4 percent of the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances, 1.6 percent of the *Parkinsonia florida-Olneya tesota* alliance, and 5.2 percent of the *Pleuraphis rigida* alliance in the cumulative analysis area is projected to occur as a result of existing and foreseeable future projects. As shown in Table 4.3-4, implementation of Alternative 1 would contribute 10.6 percent of the cumulative impact to the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances, Alternative 2 would contribute 7.7 percent of the impact to the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances, and Alternative 3 would contribute 5.5 percent of the impact to the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances. Associated contributions to the *Pleuraphis rigida* alliance would be 1.7 percent for Alternative 1, and 0.1 percent for Alternatives 2 and 3. The *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances and the *Pleuraphis rigida* alliance are not identified as a BLM or CDFW sensitive vegetation community.

Preparation and implementation of the VRMP (to restore temporarily disturbed areas), Decommissioning and Restoration Plan, and other plans as required in APM BIO-2 (Construction-Related Plans) and BIO-4 (Vegetation Resources Management Plan), and the implementation of

Mitigation Measures VEG-7 (Biological Resources Mitigation Implementation and Monitoring Plan), VEG-8 (Avoidance of Biological Resources During Construction), VEG-10 (Measures for Riparian Habitat and State Waters), WIL-4, WIL-9, WIL-10, and WIL-12, would ensure that the loss of the *Parkinsonia florida-Olneya tesota* alliance habitat from the DQSP is adequately compensated for and equivalent habitat would be protected off-site. Implementation of these measures would reduce the Project’s contribution to a cumulative impact on sensitive natural alliances, and the Project’s contribution would not be cumulatively considerable (impact BIO-2).

Table 4.3-4. Cumulative Impacts to Vegetation Alliances

Vegetation Community ¹	Vegetation Alliance	Acreage within Study Area ¹	Impacts of Present and Future Projects ¹	Impacts of Alternative 1	Impacts of Alternative 2	Impacts of Alternative 3
Sonoran creosote bush scrub	<i>Larrea tridentata</i> and <i>Larrea tridentata-Ambrosia dumosa</i> alliances	403,579 acres	33,748 acres (8.4% of total)	3,575 acres (10.6% of total cumulative impact)	2,605 acres (7.7% of total cumulative impact)	1,870 acres (5.5% of total cumulative impact)
Desert dry wash woodland	<i>Parkinsonia florida-Olneya tesota</i> alliance	108,335 acres	1,743 acres (1.6% of total)	0 acres (0% of total cumulative impact)	0 acres (0% of total cumulative impact)	0 acres (0% of total cumulative impact)
Stabilized Sand Dune	<i>Pleuraphis rigida</i> alliance	37,823 acres	2,257 acres (5.2% of total)	40 acres (1.7% of total cumulative impact)	2.3 acres (0.1% of total cumulative impact)	2.3 acres (0.1% of total cumulative impact)

Source:

1 – Sources of acreage of impacts from past and potential future projects was obtained from Table 4.3-5 in McCoy EIS (BLM 2012b), specific acreage reported in completed environmental documents (MSEP, Modified BSPP, and BMSP), and the Proposed Action acreages for DQSP. Values from other environmental documents were reported as vegetation communities, not alliances.

2 – Acreage includes an assumption that all impacts of the additional projects for which specific acreages are not reported will occur in the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances.

Special-Status Plant Species

As discussed above, the development of numerous large-scale projects, such as other wind and solar generation facilities would result in a substantial long-term conversion of desert habitat to industrial and commercial uses, which would remove habitat for many special-status plant species and cacti. Therefore, the loss of this habitat is anticipated to result in cumulative impacts on populations of many special-status plant species and cacti. As shown in Table 4.3-4, the past, present, and reasonably foreseeable future projects are expected to impact less than 10 percent of the available vegetation habitat in the Study Area, and the contribution of the Proposed Action ranges from 0 to 10.6 percent of the cumulative impact. In addition, preparation and implementation of the Vegetation Resources Management Plan (to restore temporarily disturbed areas), Decommissioning and Restoration Plan, and other plans as required in APM BIO-2 (Construction-Related Plans) and BIO-4 (Vegetation Resources Management Plan), and the

implementation of Mitigation Measures VEG-7 (Biological Resources Mitigation Implementation and Monitoring Plan), VEG-8 (Avoidance of Biological Resources During Construction), VEG-10 (Measures for Riparian Habitat and State Waters), WIL-4, WIL-9, and WIL-10 provide for the salvage of rare plants and cacti, avoidance of special-status plants whenever possible, and compensatory mitigation. Provided the ROW grant is not extended beyond the 30 year operational period, site restoration following decommissioning would minimize the loss of special-status plant species and protect similar habitat off-site. Through implementation of these measures, the Project's contribution to a cumulative impact on special-status plant species would not be cumulatively considerable (impact BIO-1).

Local Policies or Ordinances Protecting Vegetation Resources

The Project is not proposed within the boundaries of any adopted habitat conservation plan or natural community conservation plan. The Project site is within the CDCA and is within the planning boundaries of the NECO Plan amendment to the CDCA Plan. The Project was planned and designed in coordination with BLM with the intent of providing consistency with the NECO Plan and CDCA Plan. The Project would not contribute to a conflict with any local policies or ordinances protecting biological resources (impact BIO-5) or with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan (impact BIO-6).

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The overall cumulative impacts associated with implementation of Alternative 2 would be similar in type as described for Alternative 1. The decrease in the contribution to cumulative impacts to the *Pleuraphis rigida* alliance from implementation of Alternative 2 is substantial compared to Alternative 1, since there would be a decrease of approximately 38 acres (or a 94 percent decrease) of the *Pleuraphis rigida* alliance impacted with this alternative. Similarly, the contribution to cumulative impacts on common and other special-status species would also occur with the implementation of Alternative 2. However, the decreased impact footprint relative to Alternative 1 would also result in a similar decrease associated with Alternative 2's contribution to those impacts. The APMs and Mitigation Measures outlined for Alternative 1 would also be pertinent for Alternative 2. Implementation of these measures would reduce impacts to sensitive wildlife species and their habitat and provide that impacted habitat is adequately mitigated with equivalent habitat that would be protected off-site.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The overall cumulative impacts associated with implementation of Alternative 3 would be similar in type as described for Alternatives 1 and 2. The decrease in cumulative impacts to the *Pleuraphis rigida* alliance from implementation of Alternative 3 is substantial compared to Alternative 1, since there would be a decrease of approximately 38 acres (or a 94 percent decrease) of the *Pleuraphis rigida* alliance impacted with this alternative. The contribution to cumulative impacts to the *Pleuraphis rigida* alliance is the same between Alternatives 2 and 3. The APMs and Mitigation Measures outlined for Alternative 1 would also be pertinent for Alternative 3.

Implementation of these measures would reduce impacts to sensitive wildlife species and their habitat and provide that impacted habitat is adequately mitigated with equivalent habitat that would be protected off-site.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. Alternative 4 would not contribute to cumulative impacts to vegetation resources.

4.3.7 Residual Impacts

The Proposed Action and other action alternatives would cause adverse impacts to vegetation resources, eliminating most of the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances and the *Pleuraphis rigida* alliance within the disturbance area of Alternative 1. Alternatives 2 and 3 have relatively fewer impacts to vegetation resources, but would still result in the loss of special-status species and important desert habitats. As discussed in the sections above, the recommended avoidance and minimization measures as well as compensatory mitigation would effectively offset direct, indirect, and cumulative impacts in varying, but unquantified degrees and assure compliance with state and Federal laws. It is expected that some residual adverse effects would remain after mitigation measures have been applied; however, these impacts would be less than significant after mitigation.

4.4 Biological Resources - Wildlife

4.4.1 Methodology for Analysis

This section analyzes potential impacts to wildlife resources from construction, operation and maintenance, and decommissioning of the Proposed Action and Alternatives. This analysis of potential impacts relies on results of literature reviews and biological surveys (as summarized in Section 3.4, *Biological Resources – Wildlife*) and coordination with appropriate permitting agencies including the USFWS and CDFW. Acreages calculated for impacts were based on the best information available at the time of publication of the Final PA/EIS/EIR. A summary of the overall acreages of disturbance associated with each Alternative is provided in Table 4.4-1. As noted in Section 4.3, all ground disturbance activity is considered a permanent impact for the purposes of this analysis due to the long time period for natural reclamation to occur in the desert.

4.4.1.1 CEQA Significance Criteria

For the purpose of this analysis, the following applicable thresholds of significance have been used to determine whether implementing the Project would result in a significant impact pursuant to CEQA. These thresholds of significance are based on Appendix G of the state CEQA Guidelines and the County of Riverside CEQA Environmental Assessment Form. A biological resources impact is considered significant if implementation of the proposed Project would do any of the following:

BIO-1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS.

BIO-2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS.

BIO-3) Have a substantial adverse effect on Federal protected wetlands as defined by Section 404 of the Clean Water Act (CWA) (including, but not limited to, marshes, vernal pools, and coastal areas) or any state-protected jurisdictional areas not subject to regulation under Section 404 of the CWA through direct removal, filling, hydrological interruption, or other means.

BIO-4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

BIO-5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

BIO-6) Conflict with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan.

BIO-7) Substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

BIO-2 and BIO-3 are not applicable to wildlife resources; therefore, this threshold is not addressed in this section. BIO-2 and BIO-3, along with other CEQA thresholds applicable to vegetation resources are addressed in Section 4.3, *Biological Resources – Vegetation*.

4.4.2 Applicant-Proposed Measures

No APMs specific to wildlife are proposed. APM BIO-1 through APM BIO-5, discussed in Section 4.3, *Biological Resources – Vegetation*, are also applicable measures to avoid and minimize impacts to wildlife resources.

4.4.3 Direct and Indirect Impacts

A summary of the overall acreages of disturbance associated with each alternative is provided in Table 4.4-1. Impacts associated with Alternative 1 include the disturbance of 3,714 acres of habitat on the solar plant site, 54 acres in the gen-tie corridor, and 2 acres associated with the buried telecommunications line and possible above-ground electrical service line (Table 4.4-1). An additional 61 acres would be temporarily impacted by construction of the access road, and temporary construction areas, for a total of 3,831 acres of habitat disturbance. Acreages calculated for impacts were based on the best information available at the time of publication of the Final PA/EIS/EIR for the ROW and temporary disturbance areas. For the gen-tie line, temporary disturbances would be associated with string pulling sites and construction around poles. Some vegetation in temporarily disturbed areas (e.g., the string pulling sites) would be crushed by equipment, but these areas would not be otherwise disturbed. Long-term impacts outside of the solar plant site would be caused by transmission pole and tower footprints and access roads. All ground-disturbing activities within the solar plant site are assumed to be permanent in this analysis.

Table 4.4-1. Summary of Long-Term and Temporary Habitat Disturbance

Project Component	Project Alternative Disturbance Area (Acres)		
	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative
Solar Arrays	3,714	2,698	1,912
Gen-tie Line	54	67	67
Telecommunications Line	2	2.8	2.8
Total Permanent Project Area	3,770	2,768	2,033
Temporary Area for Construction	61	64.9	66.1
Total Disturbance Acreage	3,831	2,833	2,099

Table 4.4-2 summarizes the special-status wildlife species that either have been observed to occur in the Study Area for the Project or alternatives, or are expected to occur based upon the presence of suitable habitat and known species ranges. Potential roosting habitat for pallid bat and California leaf-nosed bat are known from mines and caves near the solar plant site, but no suitable roosting locations were identified within the limits of the site. The habitat requirements for each species are described in detail in Section 3.4.

Table 4.4-2. Potential for Special-Status Wildlife Species to Occur within Each Alternative Area

Special Status Wildlife Species	Project Alternative		
	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative
Amphibians			
Couch's spadefoot toad	Low	Low	Low
Reptiles			
Mojave desert tortoise	Present	Present	Present
Mojave fringe-toed lizard	Present	Present	Present
Coachella Valley fringe-toed lizard	Absent	Absent	Absent
Birds			
Cooper's hawk	Present (foraging only)	Present (foraging only)	Present (foraging only)
Western burrowing owl	Present	Present	Present
Elf owl	Low	Low	Low
Golden eagle	Moderate (foraging only)	Moderate (foraging only)	Moderate (foraging only)
Ferruginous hawk	Present (non-breeding)	Present (non-breeding)	Present (non-breeding)
Swainson's hawk	Present (non-breeding)	Present (non-breeding)	Present (non-breeding)
Vaux's swift	Present (non-breeding)	Present (non-breeding)	Present (non-breeding)
Western snowy plover	Moderate (foraging only)	Moderate (foraging only)	Moderate (foraging only)
Northern harrier	Present	Present	Present
Peregrine falcon	Present (foraging only)	Present (foraging only)	Present (foraging only)
Loggerhead shrike	Present	Present	Present
Vermillion flycatcher	Moderate	Moderate	Moderate
Bendire's thrasher	Moderate	Moderate	Moderate
Crissal thrasher	Moderate	Moderate	Moderate
Le Conte's thrasher	Present	Present	Present
Mammals			
Pallid bat	Present (foraging only)	Present (foraging only)	Present (foraging only)
Townsend's big-eared bat	Moderate	Moderate	Moderate
Western mastiff bat	Present (foraging only)	Present (foraging only)	Present (foraging only)
Pocketed free-tailed bat	Present (foraging only)	Present (foraging only)	Present (foraging only)
Western red bat	Moderate (foraging only)	Moderate (foraging only)	Moderate (foraging only)
California leaf-nosed bat	Moderate (roosting/foraging)	Moderate (roosting/foraging)	Moderate (roosting/foraging)
Cave myotis	Present (foraging only)	Present (foraging only)	Present (foraging only)
American badger	Present	Present	Present
Desert kit fox	Present	Present	Present

Source: Ironwood Consulting Inc., 2016

Table 4.4-3 summarizes the estimated number of special-status wildlife species present within the footprints of the Proposed Action and alternatives. The potential direct and indirect impacts of each action alternative on wildlife are discussed in Sections 4.4.3.1 to 4.4.3.3. Direct impacts on wildlife are considered to include injury or death to an individual, habitat loss or degradation, adverse effects on movement, increased predation, and disturbance from noise, light, or dust. Examples of potential indirect impacts include habitat degradation through the introduction of invasive species, or increased predation due to site conditions during the construction and operation and maintenance phases of the Project.

Table 4.4-3. Summary of Direct Impacts to Special-Status Wildlife Species

Special Status Wildlife by Project Component		Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action
Solar Plant Site					
Mojave Desert Tortoise	Tracks	0	0	0	0
	Suitable habitat acreage	3,524 acres	2,537 acres	1,802 acres	0
Mojave Fringe-toed Lizard	Individual Occurrences	107	0	0	0
	Occupied Habitat Acreage ¹	64 acres	0 acres	0 acres	0 acres
	Potential Habitat Acreage ²	3,650 acres	2,698 acres	1,963 acres	0 acres
Kit Fox	Dens	6	5	4	0
Burrowing owl	Active nests ³	1	1	1	0
Gen-Tie Line, Communications Line, and Temporary Work Areas Outside of Fence					
Mojave desert tortoise	Tracks	1	1	1	0
	Suitable habitat acreage	51 acres	68 acres	68 acres	0
Mojave Fringe-toed Lizard	Individual Occurrences	28	30	30	0
	Occupied Habitat Acreage ¹	15 acres	16 acres	16 acres	0 acres
	Potential Habitat Acreage ²	41 acres	68 acres	68 acres	0 acres
Kit Fox	Dens	0	0	0	0
Burrowing owl	Active nests ³	0	0	0	0

1 – Occupied Mojave fringe-toed lizard habitat based on 150 foot buffer surrounding individual occurrences.

2 – Potential Mojave fringe-toed lizard habitat based on modeled suitable habitat that is not occupied.

3 – Active nests based on surveys between 2012 and 2014. Actual number to be based on pre-construction surveys.

4.4.3.1 Alternative 1: Proposed Action

Construction

Wildlife Habitat

The removal of habitat under Alternative 1 would have a direct effect on wildlife species through habitat loss (see below for separate discussions of impacts on special-status wildlife species and wildlife movement and breeding). Impacts include the disturbance of 3,770 acres of habitat on the solar plant site (3,714 acres), gen-tie line (54 acres), and buried telecommunications line and possible above-ground electrical service line (2 acres) (Table 4.4-1). An additional 61 acres would be temporarily impacted by construction of the access road, and temporary construction areas.

Construction of the Project would increase noise, night lighting, and fugitive dust that could disturb common and special-status wildlife species near the construction area. Many species are sensitive to visual and noise disturbances that could cause wildlife to alter foraging and/or breeding behavior and avoid suitable habitat in adjacent areas. Night lighting also could attract wildlife to the site, disrupting their normal pattern of behavior. During construction, nighttime task lighting would be used only as necessary. In addition, implementation of dust control mitigation measures discussed in Section 4.2, *Air Resources*, would reduce impacts associated with dust.

As discussed in Section 4.3, *Biological Resources - Vegetation*, Project construction also has the potential to introduce invasive plant species outside of the Project site, which could result in the degradation of wildlife habitat outside of the solar plant site and linear corridors.

Mojave Desert Tortoise

As shown in Figure 3.4-1, signs of Mojave desert tortoise were found primarily on the north-central portion of the Project solar plant site, north and northwest of the private inholding (tortoise carcass or parts thereof), and within the linear corridors (one incidental observation of tortoise tracks). Of the vegetation alliances onsite, only the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances are considered to be potential Mojave desert tortoise habitat, because the sand dunes south of I-10, along the northern portion of Alternative 1, are sandier and provide less favorable habitat for tortoises. Therefore, Table 4.3-1 shows that the Project would have a direct impact to 3,575 acres of suitable Mojave desert tortoise habitat. All six of the documented locations of tortoise sign (carcasses) shown in Figure 3.4-1 would be within the Project area.

Since no live Mojave desert tortoises were documented during protocol level surveys for the species, the USFWS population estimate methodology cannot be used to calculate the population density for the Alternative 1 site. The nearby MSEP was documented as having a low tortoise population density (0.2 adult tortoises per square mile of habitat). However, the MSEP is located closer to the McCoy Mountains and the associated alluvial fans at the base of the mountains, which the DRECP has identified as having relatively higher value to the Mojave desert tortoise within the McCoy valley. Since the Project area is relatively more distant from the base of the McCoy Mountains, it is assumed that the Alternative 1 Mojave desert tortoise habitat value and associated tortoise population density, is even lower than assumed for the MSEP. However, based on the incidental observation of Mojave desert tortoise tracks at one location along the utility corridor, the Mojave desert tortoise population density was estimated to be approximately 1 adult Mojave desert tortoise for the Alternative 1 Project area. Direct effects could include individual tortoises being crushed or entombed in their burrows, collection or vandalism, disruption of tortoise behavior during construction or operation of facilities, disturbance by noise or vibrations from the heavy equipment, and injury or mortality from encounters with workers' or visitors' pets. Mojave desert tortoises also could be attracted to the construction area by application of water to control dust, placing them at higher risk of injury or mortality. Increased human activity and vehicle travel would occur from the construction and improvement of access roads, which could disturb, injure, or kill individual tortoises. Tortoises are most likely to be killed, injured, or harassed if they have taken shelter under a parked car in order to seek shade or thermal cover, particularly along utility corridors (Boarman 2002).

Foraging opportunities for common raven, kit fox, coyote and other predators would temporarily increase on the Project site during construction. Construction activities are expected to provide food for scavengers and opportunistic feeders. Potential sources of increased predator base include

inappropriately discarded food trash, increases in equipment-related wildlife mortality, and the availability of water sources, which tend to draw species that prey on Mojave desert tortoise.

Common raven populations in some areas of the Mojave Desert have increased over 1,000 percent from 1968 to 1988 in response to expanding human use of the desert, largely as a result of human-caused land alterations that have increased and stabilized food, water, and nesting site availability to ravens (Boarman 2002; Boarman and Berry 1995). Project construction, operation, and maintenance could temporarily increase raven and coyote presence in the Project area.

Ravens capitalize on human encroachment and expand into areas where they previously were absent or in low abundance. Ravens habituate to human activities and are subsidized by the food and water, as well as roosting and nesting resources, that are introduced or augmented by human encroachment. The City of Blythe and the nearby airport provide food, water features, and roosting/nesting substrates (buildings, signs, lamps, and utility poles) that otherwise would be unavailable. This development near the Project provides year-round water and trash subsidies for the raven as well as nesting opportunities.

It is anticipated that the existing baseline level of wildlife road kills would increase with Project construction and operation traffic, providing an additional food source that could exacerbate the raven/predator attraction and potentially increase predation pressure on Mojave desert tortoise. Increased vehicle traffic on access roads during the construction period could also increase the risk of tortoise mortality. The potential for increased traffic-related tortoise mortality is greatest along paved roads where vehicle frequency and speed is greatest, though tortoises on dirt roads also could be affected depending on vehicle frequency, speed, and driver attentiveness. Additional unauthorized impacts could occur from casual use of access roads due to unauthorized off-road activities.

The capture, handling, and relocation of Mojave desert tortoises from the Project site following the installation of perimeter wildlife exclusion fencing could result in the harassment and mortality of juvenile and adult Mojave desert tortoises during relocation. As previously discussed, local tortoise densities were assumed to be similar to the estimate for the nearby MSEP, which was determined to be 0.2 adults per square mile. Extrapolated for Alternative 1, it is estimated that 1 adult tortoise occupies the Project site. Therefore, it is assumed that any juvenile and/or adult tortoises could be relocated from the site prior to construction and would be subject to harassment and possibly death or injury. A Mojave desert tortoise translocation area will be selected and approved through the ESA Section 7 consultation process, and via the development of the Project's Desert Tortoise Translocation Plan (Mitigation Measure WIL-2).

Tortoises could die or become injured by capture and relocation if these methods are performed improperly, particularly during extreme temperatures, or if they void their bladders. If multiple Mojave desert tortoises are handled by biologists without the use of appropriate protective measures, pathogens could be spread among the tortoises, both resident and relocated or translocated animals. Relocated tortoises also could be subject to increased risk of predation, increased intraspecific competition, reduced availability of food or water resources, reduced health, exposure to environmental elements, and death. However, the site is not expected to be inhabited by a population of Mojave desert tortoise, but would instead provide an area which tortoises traverse across between the populations in the foothills of the McCoy Mountains (north of the site) and the Mule Mountains (south of the site). The addition of external site fencing could alter tortoise movement by directing tortoises around the fenced perimeter, but would not be

anticipated to change their home range, nor would it be expected to separate individuals from the regional tortoise population.

As discussed in Section 4.3, *Biological Resources - Vegetation*, during and following construction, several invasive plant species could colonize disturbed areas within the solar plant site fencing and spread into adjacent vegetation alliances, thereby reducing habitat values for native plant and wildlife species. The spread of invasive weeds both within and outside of the Project boundary could result in the degradation of additional habitat for the Mojave desert tortoise.

Construction activities are expected to expose fine silt and other erosion-prone soils. This would temporarily increase suspended dust in off-site Mojave desert tortoise habitat, particularly during periods of high wind. Increased dust may have adverse effects on the health and survival of individual tortoises. The exposure of Mojave desert tortoises to dust suppression chemicals, if used, would have unknown effects on tortoise populations.

Mojave Fringe-toed Lizard

Direct impacts to Mojave fringe-toed lizards during construction of the solar facility, gen-tie line, distribution line, and associated access roads would occur due to removal of habitat and accidental mortality of lizards from vehicle strikes. The Mojave fringe-toed lizard has wide distribution in portions of the gen-tie line alignment located south of I-10, with 135 individuals identified in the Alternative 1 Study Area during surveys (107 within the solar facility footprint, 28 along the gen-tie corridor). Within 150 feet of these documented occurrences, Alternative 1 would directly impact 78 acres of occupied habitat. As shown in Figure 3.4-3, the remainder of the Project area was identified as suitable habitat in the DRECP model, and is therefore considered to be potential habitat. Alternative 1 would directly impact 3,692 acres of this potential habitat.

The NECO Plan Amendment to the CDCA Plan (BLM 2002) and Mitigation Measure WIL-10 requires that permanent habitat loss and direct impacts to Mojave fringe-toed lizards shall be subject to compensatory mitigation at a 3:1 ratio, which may include compensation lands purchased in fee or in easement in whole or in part, for impacts to Mojave fringe-toed lizard habitat. Without this mitigation, the project would not be consistent with the land use plan, with which BLM is required to comply. It is uncertain whether sufficient private lands meeting the habitat criteria may be available for purchase. Therefore, compensation required under Mitigation Measure WIL-10 may be accomplished through acquisition and management of off-site habitat or, if suitable compensation habitat is not available, through off-site habitat enhancement and restoration (e.g., by controlling weeds). However, it is also uncertain whether off-site enhancement and restoration can feasibly and effectively restore natural sand transport function and aeolian sand habitat values. Therefore, with implementation of Mitigation Measure WIL-10 to the extent it is feasible, the Proposed Action's direct effects on sand transport may remain only partially mitigated.

Indirect construction impacts include increased predation on lizards by raptors, ravens, and other birds such as loggerhead shrike; the introduction and spread of exotic vegetation species; fragmentation and degradation of occupied dune habitat; and hazards associated with the spraying of herbicides and dust suppression chemicals within occupied habitat. Potential indirect effects to Mojave fringe-toed lizard habitat could also occur if the Project were to interfere with the flow of sediment or moisture to the habitat. Habitat for the Mojave fringe-toed lizard is associated with sand deposits, which are present in both alluvial and eolian deposits in the Project area. The

floodplain area designated as FP1, shown in Figure 4.3-1, roughly corresponds to the *Parkinsonia florida-Olneya tesota* vegetation alliance mapped by BLM, and is also identified as a ponding area that is critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems by Kenney (2017). As shown in Tables 4.3-1 and 4.3-2, the Project would not directly impact the *Parkinsonia florida-Olneya tesota* vegetation alliance, but would directly impact 6.3 acres of the FP1 watercourse. This direct impact could affect the function of the area as a sand source and stabilizing moisture for sand dune systems, resulting in an indirect impact to occupied or potential habitat for the Mojave fringe-toed lizard.

The potential for operation of the Project to indirectly impact habitat for the Mojave fringe-toed lizard is similar to the analysis of indirect impacts to vegetation alliances. As demonstrated by Potter and Weigand (2016) at Palen dunes, there is the potential for inactive areas within dune fields to become active within a very short timeframe. If this were to occur, then the occupation of the land area by a solar project could either hinder or facilitate expansion of occupied Mojave fringe-toed lizard habitat. As the Alternative situated closest to the known occupied habitat for the Mojave fringe-toed lizard, the potential for these indirect impacts to occur is higher under Alternative 1 than Alternatives 2 or 3.

Couch's Spadefoot Toad

The BRTR (Ironwood 2016) identified 27 locations within the Study Area that had standing water at some point between 2008 and 2012. Two of these locations were identified as likely to support the species, due to their extent and association with dry desert wash woodland plant species. One of these was the *Parkinsonia florida-Olneya tesota* alliance area located near the NRG Blythe Solar facility (also identified in Huffman-Broadway [2017] as floodplain FP-1), and the other was located in the buffer outside of the Project area. Both locations were visited after heavy rains between 2008 and 2012 to determine if they held ponded water for more than 8 days, and they were also subjected to monitoring during the monsoon season in the summer of 2013. Neither area was determined to hold ponded water for more than 8 days. However, breeding ponds are only one aspect of habitat required by the species. These toads spend most of the year in refuge burrows, buried underground. The location of refuge burrows is not known, but it is not thought to be in soil underneath dried up breeding pools. Therefore, the ephemeral nature of the ponds and absence of documented occurrences does not necessarily document that the species is absent. There are reports from other projects of the species being present at the CRSS, and there is predicted occupied habitat present onsite in the DRECP suitable habitat model.

If this species is present in the project site, impacts from construction could include loss of habitat and direct mortality during grading and construction. Construction activities that create pits or depressions during the summer rains could attract toads which then would be vulnerable to additional construction impacts. During project construction and operation, Couch's spadefoot toads could be crushed on access roads when they surface to breed or forage. To address these potential impacts, Mitigation Measure WIL-12 (Couch's Spadefoot Toad Protection and Mitigation) would require avoidance and minimization measures should occupied habitat be identified within or adjacent to the Project site during pre-construction surveys, or during routine monitoring associated with any other phase of the Project.

Nesting Birds

The Proposed Action would result in direct and indirect impacts to nesting bird species protected under Fish and Game Code §§3503.5 and 3511, and the Migratory Bird Treaty Act. Site clearing, vegetation removal, ground disturbance, and construction noise could cause nest abandonment and death of young or loss of reproductive potential at active nests located in or near the Study Area. Additionally, night lighting during construction has the potential to affect nesting bird species.

Migratory Birds

During construction of the Project, the Applicant proposes to use either ponds covered with wildlife exclusion fencing, or tanks to store water for dust control. If ponds are used, they could provide an attractant to migratory birds. To minimize the potential for such impacts, Mitigation Measure WIL-13 (Development of Ponding Area) requires that the Applicant provide the BLM with an analysis of the feasibility of using tanks, as part of an application for authorization for ponds.

Golden Eagle

The Proposed Action occurs in the breeding range of the golden eagle. Golden Eagle Territory and Occupancy Surveys were conducted within a 10-mile buffer area surrounding the Project site. No nesting territories were documented during the surveys, although a golden eagle was documented soaring over the Study Area. A total of 26 raptor and raven nests were documented within the 10-mile buffer, none of which were verified as active golden eagle nests (Ironwood 2016). A previously active golden eagle nest within the Territory and Occupancy Survey area includes a nest documented during 2010/2011 surveys approximately 21 miles north of the Project in the Big Maria Mountains (Tetra Tech EC, Inc., 2011). A nest location is also identified in DRECP in the McCoy Mountains, approximately 8 miles northwest of the Project. This nest was found to not be active, and there is no information regarding when it was last active.

The Project would likely not result in direct or indirect impacts to golden eagle nests because of the large distance between active nest sites and the Project site. Due to lack of active nests near the Project and low observed prey densities on the site (i.e., 0.0035 black-tailed jackrabbits per acre), golden eagles are expected to forage infrequently within the Alternative 1 site.

Western Burrowing Owl

The most recently available survey data documented 12 unused owl burrows, and an additional four occupied burrows were observed within the Study Area (Ironwood 2016). The two northern occupied burrows are located outside of the Proposed Action footprint, and therefore would not be impacted by Alternative 1. The remaining two occupied burrows are located on the northeast portion of the Study Area, and only one of these burrows is located within the footprint of the solar arrays. It is anticipated that all identified active burrows on the solar plant site would be removed during Project construction and those on the linear corridor would be avoided where feasible. The majority of the Alternative 1 site, excluding the *Pleuraphis rigida* alliance, *Parkinsonia florida-Olneya tesota* alliance, and portions of the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances adjacent to the sand dunes, is considered to provide suitable burrowing owl foraging habitat (Ironwood 2016).

In addition to direct impacts on individual owls and burrows, burrowing owl survival can be indirectly affected by human disturbance and foraging habitat loss even when impacts to individual owls and burrows are avoided. A significant impact to the burrowing owl may occur if there is:

1. Disturbance or harassment within approximately 160 feet of occupied burrows;
2. Destruction of burrows and burrow entrances; and/or
3. Degradation of foraging habitat adjacent to occupied burrows (i.e., an approximately 6.5 acres based on a 300-foot radius around each occupied breeding or resident burrow; CDFW 1995).

American Badger and Desert Kit Fox

Project construction has the potential to injure or kill American badgers and desert kit foxes by crushing them with construction equipment or by crushing den entrances, which would prevent them from escaping. Following the erection of perimeter fencing around the solar plant site and subsequent wildlife clearance surveys, the perimeter fence would limit badger and kit fox access to the main Project site, and consequently would reduce the likelihood of injury on the site during construction. There is also a low risk that individual animals could be inadvertently injured or killed by vehicles on access roads.

Six active kit fox burrows/den complexes were documented with wildlife camera stations within the Alternative 1 site, all within the southern portion of the Study Area (Ironwood 2016), within the proposed solar array fields associated with Alternative 1. Photographic evidence indicated occupation of four burrows/den complexes by one adult individual (unknown whether it was the same adult moving between areas, or multiple individuals), one pair of adults at another burrow/den complex, and a family unit consisting of a breeding pair and three juveniles at the last burrow/den complex. No American badger individuals were documented through direct observation or via wildlife camera stations. However, several instances of badger sign (scat and digs) were recorded on the southern edge of the Study Area (Ironwood 2016).

In late 2011, the first known cases of canine distemper virus (CDV) were observed in desert kit foxes about 20 miles west of Blythe on public lands managed by the BLM and leased to Genesis Solar LLC to construct the Genesis Solar Energy Project site. CDFW believes that the outbreak originated from an infected host animal entering the site, possibly a wild or domestic dog, American badger, or other carnivore. The rapid spread of CDV within the kit fox population was facilitated by the project-related displacement of infected animals from the Genesis site into new kit fox territories. Subsequently, desert kit foxes were captured for disease testing at the First Solar Desert Sunlight, Solar Millennium Palen, Genesis Ford Dry Lake, and at Southern California Edison's CRSS and CDV was identified at the two later sites, which span a distance of about 40 miles on the I-10 corridor within the Chuckwalla Valley (CEC 2012).

The typical practice for solar projects has been to exclude desert kit foxes from project areas during pre-construction clearing of project sites by "passive relocation" methods (i.e., by closing burrows, forcing foxes to locate to new off-site burrows). In the absence of protective measures the Project has the potential to worsen the CDV outbreak by raising kit fox stress levels and causing increased susceptibility to infection, causing increased movement of diseased animals thereby increasing the spread of disease into new areas, or placing healthy kit foxes into contact with off-site infected animals (CEC 2012).

Desert Bighorn Sheep and Burro Deer

The Project site is unlikely to serve as a potential movement corridor for Desert bighorn sheep based on their low numbers in the region. Presently, the Mule Mountains are considered an unoccupied portion of the bighorn's range, and the deme (subpopulation) in these mountains has been considered lost (BLM 2002). Repopulation in the Mule Mountains could happen naturally (via recruitment from the Chuckwalla Mountains/Little Mule Mountains deme to the west and southwest of the Project and the Mule Mountains) or could happen deliberately via translocation of breeding individuals. The CDFW has successfully re-established bighorn in some ranges in the past. Due to the low likelihood of bighorn sheep from the Project area, the construction phase of the Project would not adversely affect habitat for this species or cause effects to individual sheep or sheep populations.

The Project would not present a complete barrier to movement between mountain ranges as sheep still could disperse around the site to the west, north, and south. Corridors described in the NECO Plan Amendment to the CDCA Plan (BLM 2002) identify potential for bighorn sheep movement from the Mule Mountains south to the Chocolate Mountains and west to the Chuckwalla Mountains. Further, the Project site, due to the width of the valley in which the solar facility would be located, has limited value as a movement corridor.

Direct and indirect construction impacts to burro deer include the loss of foraging habitat in the *Parkinsonia florida-Olneya tesota* alliance, vegetated swales, and the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances, and potential barriers to local and regional deer movement. The Project area has a Very Low or Low habitat intactness in the DRECP habitat intactness model. The Project would not present a barrier to regional movement because deer still could disperse around the site to the west, north, and south.

Special-Status Bats

No bat roosts or colonies were identified within the Project site. The closest known bat colony is located approximately 3.4 miles south of Alternative 1, at the Hodge Mine in the Mule Mountains (Ironwood 2016). All habitats within the solar plant site are suitable for bat foraging. Direct and indirect impacts to bat species are expected if construction activities were to disrupt nighttime foraging activities, as well as loss of foraging habitat.

Operation and Maintenance

Special-Status Amphibians, Reptiles, and Terrestrial Mammals

Special-status amphibians, reptiles, and terrestrial mammals, including Mojave desert tortoises, Mojave fringe-toed lizards, American badgers, and desert kit foxes, may access the Project site during the O&M phase, either by excavating under the perimeter fence or walking through the Project entrances. To minimize the chances for individuals of these species to access the Project site, the Applicant will install Mojave desert tortoise exclusionary fencing at the base of the perimeter security fence and cattle guards at Project entrances. These structures will be inspected quarterly and after storm events, and their integrity maintained, as necessary. Finally, if any terrestrial special-status species gain access to the Project site despite implementation of these minimization measures, the Applicant will ensure that an Authorized Biologist captures and relocates the individual(s) outside of the Project site, coordinating with USFWS and CDFW, as needed.

The presence of employees on the Project site during O&M activities could introduce trash into the area and attract common ravens, coyotes, or other Mojave desert tortoise predators. Increased predation upon Mojave desert tortoises would be an indirect Project impact. Similar impacts would be anticipated to Mojave fringe-toed lizard.

Lighting for the Project could disturb special-status wildlife species in adjacent areas. Night lighting would be provided at the O&M building, the On-Site Substation, the temporary construction staging areas, and on or near each PCS station. All lighting would be kept to the minimum required for safety and security; sensors, motion detectors, and switches would be used to keep lighting turned off when not required; and all lights would be hooded and directed downward to minimize backscatter and off-site light.

Migratory Birds

Operation and maintenance activities are unlikely to result in direct or indirect impacts to nesting bird species protected under the Migratory Bird Treaty Act and the Fish and Game Code. O&M activities could result in active nests being removed from existing facilities if conflicts are identified (e.g., nest locations create a hazardous situation). There is a low chance that nesting bird disturbance could occur in association with the removal or management of vegetation within the solar plant site or other facilities site, or due to foot or vehicle traffic associated with O&M activities. Additionally, night lighting during O&M activities has the potential to affect nesting bird species.

Migrating birds may be adversely impacted due to collision or electrocution associated with the gen-tie line. To reduce this risk, the Applicant proposes to follow the applicable APLIC guidelines in Suggested Practices for Avian Protection on Power Lines (APLIC 2006), and Reducing Avian Collisions with Power Lines (APLIC 2012).

The Draft PA/EIS/EIR presented raw avian injury and mortality data for the Desert Sunlight and Genesis solar projects. The Desert Sunlight observations were collected over a 5 year period (September 2011 through September 2016), while the Genesis Solar data provided for the review encompassed a much shorter period of 1 year and 7 months (March 2015 through October 2016). The data were presented and compared to determine whether they could be used to draw conclusions regarding the types of mortalities associated with the various components or, solar power facilities, or the different solar technologies. However, the data were not collected systematically, and were not amenable to correction for observation bias or carcass persistence. Some have hypothesized that migrating birds are attracted to solar facilities because the PV panels may be mistaken for water bodies. While there is insufficient evidence regarding the causal factor (Horvath et al. 2009, Argonne National Laboratory 2015), data collected by BLM and USGS demonstrate that the mortalities rates at solar facilities are larger than general background avian mortality in undeveloped desert areas (Huso and Fesnock, pers com 2017).

In 2014, Kagan and others (2014) conducted a preliminary analysis of Desert Sunlight and Genesis bird mortality raw data, along with data from the Ivanpah Solar Electric Generating System. That study determined that the fatalities for which a cause could be identified at Desert Sunlight and Genesis were primarily impact trauma, whereas the fatalities at Ivanpah were due to solar flux.

More recently, systematic post-construction monitoring programs have been implemented at several solar facilities in the East Riverside County area, including Desert Sunlight, McCoy, and Blythe. These include:

- Desert Sunlight, second annual report 2016-2017 (WEST 2018b);
- Blythe, first annual report 2016-2017 (WEST 2018c); and
- McCoy, first annual report 2016-2017 (WEST 2018d) and 2017 Spring Quarterly Interim Report (WEST 2018e)

The raw observation data from these surveys was corrected for searcher efficiency and carcass persistence to allow a better understanding of actual mortality numbers, as well as to allow a comparison among these three facilities. Table 4.4-4 presents the adjusted fatality estimates for all three facilities. These include distinguishing between the avian guilds of passerines (perching birds) versus water-associated birds, and between observations on fenceline, gen-tie line, and solar array components of the facilities. The results from McCoy and Blythe, which are in close proximity to each other, are very similar. Each of these facilities had approximately 40 total fatalities associated with the solar array (36 for McCoy, and 42 for Blythe). In both cases, all solar array fatalities were passerines, with no fatalities of water-related species. Each facility also had approximately 10 fatalities of passerines along the fenceline. These results are in contrast to the total fatalities reported for Desert Sunlight, which included 290 passerines and 532 water-related species in the solar array, and 6 passerines and 52 water-related species on the fenceline, although it should be noted that the higher numbers of fatalities are associated with a larger facility.

Table 4.4-4. Comparison of adjusted fatality estimates by guild and component for Desert Sunlight Solar, McCoy Solar, and Blythe Solar¹

Guild	Solar Array			Fence Line			Gen-tie Line	
	Desert Sunlight	McCoy	Blythe	Desert Sunlight	McCoy	Blythe	Desert Sunlight	Joint McCoy/Blythe ²
Passerines	290	35.76	42	6	11.65	9	298	648
All water-associated birds	532	0	0	52	0	2	3	7
Total	822	35.76	42	58	11.65	11	301	655

1 – Desert Sunlight Solar avian mortality data collected during the 2016 – 2017 annual monitoring period (February 29, 2016 – February 28, 2017); McCoy Solar avian mortality data collected during the Year 1 monitoring study (March 1, 2016 – February 26, 2017); and Blythe Solar avian mortality collected during the Year 1 monitoring study (March 1, 2016 – February 28, 2017).

2 – Blythe and McCoy share a gen-tie corridor, so surveys are not conducted separately for the gen-tie lines of these two projects.

In addition to the data for the three facilities, the McCoy annual report (WEST 2018d) and Blythe annual report (WEST 2018c) presented and compared adjusted fatality estimates for McCoy, Blythe, Desert Sunlight, Genesis, and California Valley Solar Ranch. Of these facilities, McCoy and Blythe are the closest to the proposed DQSP, being situated north of I-15, in a similar setting on the Palo Verde Mesa. Desert Sunlight and Genesis are both situated west of the McCoy Mountains. California Valley Solar is located in San Luis Obispo County. These data are presented in Table 4.4-6. Table 4.4-6 shows adjusted fatalities for each of the facilities on a per MW basis, and on a per kilometer (km) of gen-tie line basis. As shown in Table 4.4-6, the fatalities per MW are substantially lower for McCoy and Blythe (approximately 0.23 to 0.24 fatalities per MW) than Desert Sunlight (1.05 fatalities per MW in Year 1, and 1.91 fatalities per MW in Year 2) and Genesis (2.59 fatalities per MW in Year 1, and 0.83 fatalities per MW in Year 2). The gen-

tie-associated fatalities for McCoy and Blythe were 42.2 fatalities per km, within the same range as those for Desert Sunlight (53.3 fatalities per km in Year 1, and 24.3 fatalities per km in Year 2) and Genesis (30.4 fatalities per km in Year 1, and 53.3 fatalities per km in Year 2) (WEST 2018c).

Table 4.4-5. Adjusted fatality estimates standardized by megawatt (MW) and kilometer (km) for three solar projects (Desert Sunlight, McCoy, and Blythe)¹.

Project Name and Study Year	Adjusted Fatality Estimate (per MW)	Total MW	Adjusted Fatality Estimate (per km)	Total km
McCoy Solar Project Year 1	0.23	250	42.2 ²	18.5 ²
Blythe Solar Project Year 1	0.24	172.6		
Desert Sunlight Year 1	1.05	550	53.3	19.2
Desert Sunlight Year 2	1.91	550	24.3	19.2
Genesis Year 1	2.59	250	30.4	16.8
Genesis Year 2	0.83	250	13.2	16.8
California Valley Solar Ranch Year 1	7.34	250	111.5	4.0
California Valley Solar Ranch Year 2	9.26	250	24.8	4.0

1 – Based on WEST 2018.

2 – McCoy Solar and Blythe Solar share a common gen-tie line, and therefore, fatality estimates are represented as the same value along the common linear feature.

The McCoy and Blythe monitoring reports (WEST 2018d and 2018c) also summarized any observations of special-status bird species detected at the facilities. No bird species listed as Federal or state threatened or endangered species, California Species of Special Concern, bird species listed in the USFWS – Bird Conservation Region 33 (Sonoran and Mojave Deserts), or BLM Sensitive Species were identified at either site. The reports also noted that no one species was found in large numbers. At McCoy, 16 of the 27 species were detected only once, and 16 of the 29 species detected at Blythe were detected only once. The species found in the greatest numbers were Savannah sparrow, Wilson’s warbler, white-crowned sparrow, Brewer’s sparrow, western meadowlark, and mourning dove. These species were reviewed in the Partners in Flight population database estimates, and were found to have large population sizes that would not be affected by the projects (WEST 2018d and 2018c).

Operation and maintenance of the Project is likely to result in similar direct and indirect impacts to migratory birds moving through the region via collision, drowning, entanglement, or other “unknown” causes (which may or may not be attributable to the solar facility). However, the majority of the migratory birds encountering the Project would not be expected to nest on the facility. In the unlikely event that migratory birds nest at the operating facility, direct or indirect impacts could occur to species protected under the Migratory Bird Treaty Act and the Fish and Game Code. In the mortality monitoring data for the Desert Sunlight operations and maintenance phase, one individual of Ridgway’s rail (*Rallus obsoletus*), a Federally-listed endangered species, was documented along an access road. It was recorded in the database in association with a PV panel. However, detailed notes in the monitoring data indicated that the rail carcass was found along a closed road, and that no evidence of impact with a PV panel was found.

Given the close proximity, similar PV technology, and similar geographic setting on the Palo Verde Mesa, it is likely that the number of solar array-related fatalities at the DQSP would be more similar to those of McCoy and Blythe than those of Desert Sunlight and Genesis. Because the DQSP gen-tie line would be parallel to and located within the same corridor as that for McCoy and Blythe, it is likely that gen-tie-related fatalities would be similar to those facilities.

While migratory Federally-listed species have the potential for flying through the region, there is only circumstantial evidence that they collide with PV panels in the region. Additionally, a review of the mortality monitoring data from Genesis, McCoy, and Blythe indicates that no species of rail or any other special-status bird species (Federal or state threatened or endangered species, California Species of Special Concern, bird species listed in the USFWS – Bird Conservation Region 33 (Sonoran and Mojave Deserts), or BLM Sensitive Species) was documented during their respective monitoring periods. Therefore, it is not anticipated that any adverse impacts would occur to Federally-listed migratory birds through collision with any components of the Project. O&M activities could result in active nests being removed from existing facilities if conflicts are identified (e.g., nest locations create a hazardous situation). There is a low chance that nesting bird disturbance could occur in association with the removal or management of vegetation within the solar plant site, or due to foot or vehicle traffic associated with O&M activities. Night lighting during O&M activities has the potential to affect nesting bird species. Additionally, O&M activities associated with the Proposed Action, such as washing the solar panel arrays, has the potential to directly impact nesting birds through loss of an active nest (including loss of eggs and/or nestlings) or disruption of breeding and nesting behaviors during the migratory bird nesting season.

Golden Eagle

The Project would likely not result in direct or indirect impacts to golden eagle nest sites during O&M activities because the nearest inactive nest site is approximately 8 miles from the Project site, and no active golden eagle nests were documented within 10 miles of the site during the Territory and Occupancy Survey conducted for the Project. Based on avian point counts and focused golden eagle surveys, and the low abundance of prey item density, foraging use of the Study Area is considered low (Ironwood 2016).

The Project gen-tie line would be approximately 3 miles long, and would be sited almost entirely within BLM’s Utility Corridor K and Section 368 Federal Energy Corridor 30-52. The gen-tie line would be included within a 160-foot wide corridor along its 3 mile length. The high voltage line could pose a collision hazard to birds and possibly bats.

A review of the mortality monitoring data from Desert Sunlight, Genesis, McCoy, and Blythe indicates that no eagle mortality collisions were noted for any of the existing solar facilities. The monitoring data suggest that there is a potential for mortality due to collision with the gen-tie or distribution lines, resulting from regional and local movement of avian species through the area, despite the distance from known golden eagle nests and nesting habitat and the lack of known prey concentrations on the Project site (Ironwood 2016).

The BLM has considered whether development of the DQSP could cause impacts to golden eagles related to the loss of potential foraging habitat. Although it is unknown whether golden eagles that might nest in the McCoy, Little Maria, and Big Maria Mountains in the future would utilize the Project area for foraging, avian point counts, the Territory and Occupancy Survey, and the prey

abundance estimate that have been conducted for the Project suggest that golden eagles do not maintain breeding/nesting territories on any portion of the Project, and only infrequently use the area for foraging (Ironwood 2016). Project studies, and data collected from other projects in the region, have determined no active nesting within 10 miles of the Project, and an inactive golden eagle nest approximately 8 miles from the edge of the proposed development. Additionally, the population density of the black-tailed jackrabbit, a prey item of the golden eagle, was estimated to only be 0.0035 rabbits per acre (Ironwood 2016). Furthermore, the habitat that would be disturbed or removed by development of the Project is neither unique nor limiting on the landscape and does not represent a known prey concentration. Comparable or better foraging opportunities are expected to be available within the surrounding areas. For these reasons, development and operation of the Project is not expected to appreciably disturb the foraging of any eagle pairs within 10 miles of the Project site, and indirect impacts are expected to be negligible.

Western Burrowing Owl

Operation and maintenance actions have a low likelihood to affect burrowing owls because activities would largely occur within the developed solar plant site. Burrowing owls have the potential to return to the Project area, following the completion of construction. However, if the burrowing owl does return to the Project area as a resident species, it would likely inhabit the periphery of the development footprint in either natural burrows or manmade structures (e.g., drainage culverts, debris piles, etc.). O&M activities are not expected to remove burrowing owl breeding habitat, and would occur only on Project access roads and within work areas.

American Badger and Desert Kit Fox

Because new ground disturbance would be minimal during O&M activities, it is unlikely that such activities would injure or kill American badgers or desert kit foxes. A low risk remains that badgers or foxes could be inadvertently injured or killed by vehicles on access roads during O&M activities.

Desert Bighorn Sheep and Burro Deer

Once the Project is constructed, noise and human activity are expected to be similar to pre-Project conditions. The Project site is located in an area that receives minimal public use. Therefore, O&M activities are not expected to have any more effect from vehicular use and human activity than what already occurs in the area.

Development and the associated increases in human activities adjacent to and within occupied Desert bighorn sheep and burro deer habitat have the potential to adversely affect these species by fragmenting habitat areas if located in close proximity to the base of the Mule Mountains; however, Desert bighorn sheep do not currently occupy the Mule Mountains. If reintroduced to the area, the Project would only have a minor impact on the potential regional connectivity corridor for bighorn sheep because the movement corridor is maintained to the west, north, and south of the solar plant site.

Impacts to burro deer during maintenance and operation include minor barriers to local and regional deer movement; however, the Project would not present a barrier to regional movement because deer still could disperse around the site to the west, north, and east. The Project area has a Very Low or Low habitat intactness in the DRECP habitat intactness model.

Special-Status Bats

Night lighting and insect populations close to the ground at the Project site could attract bats to the site. A review of the mortality monitoring data from Desert Sunlight, Genesis, McCoy, and Blythe indicates that very few bats have collided with project buildings. Bat mortalities documented during the 5 year monitoring period at the Desert Sunlight project site included three total mortalities, one at a transmission tower, one along a fence, and one at a project building. Monitoring at the Genesis project documented a total of 19 bat mortalities, with none along the gen-tie/transmission corridor. Mortalities were concentrated at project buildings and the power blocks, with smaller numbers along fences and at the evaporation pond. Considering the Project more closely resembles Desert Sunlight, it is anticipated that the Project would result in similarly low impacts to bat species. Annual monitoring in 2016-2017 at Desert Sunlight, McCoy, and Blythe, as well as Spring quarter 2017 monitoring at McCoy, identified only one bat carcass. The carcass, found at McCoy, was a canyon bat, which is not a special-status species.

Decommissioning

Decommissioning is anticipated to only directly affect areas that were previously disturbed during installation of Project facilities. Thus, the direct removal of wildlife habitat is not anticipated for decommissioning activities. Potential direct and indirect effects to wildlife populations during decommissioning are similar to those described for the construction phase of the Project and include wildlife disturbance from noise, light, or dust, and the introduction of invasive plant species by various vectors. Over the long-term, reclamation of the site and removal of exclusion fencing would benefit wildlife in the area.

4.4.3.2 Alternative 2: Resource Avoidance Alternative

The types of impacts related to construction, operation and maintenance, and decommissioning on wildlife resources under Alternative 2 would be similar to those described for Alternative 1. The main difference in impacts between Alternative 1 and Alternative 2 is that the solar plant site would be smaller, resulting in overall reduced impacts to wildlife habitat. Impacts associated with Alternative 2 include the disturbance of 2,768 acres of habitat for the permanent facilities. An additional 64.9 acres would be temporarily impacted by construction of the access road and temporary construction areas, for a total of 2,833 acres of habitat disturbance. Alternative 2 has a longer gen-tie corridor at 3.94 miles in length, as compared to 2.79 miles for Alternative 1.

Table 4.3-1 shows that Alternative 2 would have a direct impact to 2,605 acres of suitable Mojave desert tortoise habitat. Of the six documented locations of tortoise sign (carcasses) shown in Figure 3.4-1, three would be avoided, and three would be within the disturbance area. Due to the lack of live tortoises documented during protocol-level surveys, it is expected that the tortoise is not a resident species, but rather occasionally traverses portions of the Project site.

Similarly, there are substantially fewer Mojave fringe-toed lizard observations documented within the Alternative 2 footprint, with complete avoidance of the species within the solar plant footprint (Table 4.4-3). Within the gen-tie corridor, the number of direct impacts to Mojave fringe-toed lizard occurrences would be 35, higher than the 28 observed for the Alternative 1 gen-tie corridor. This is because the gen-tie corridor coincides with the Mojave fringe-toed lizard, and is longer under Alternative 2. Within 150 feet of these documented occurrences, Alternative 2 would directly impact 12 acres of occupied habitat. As shown in Figure 3.4-3, the remainder of the

Project area was identified as suitable habitat in the DRECP model, and is therefore considered to be potential habitat. Alternative 2 would directly impact 2,756 acres of this potential habitat.

Potential indirect effects to Mojave fringe-toed lizard habitat could also occur if Alternative 2 were to interfere with the flow of sediment or moisture to the habitat. Habitat for the Mojave fringe-toed lizard is associated with sand deposits, which are present in both alluvial and eolian deposits in the Project area. The floodplain area designated as FP1, shown in Figure 4.3-1, roughly corresponds to the *Parkinsonia florida-Olneya tesota* vegetation alliance mapped by BLM, and is also identified as a ponding area that is critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems by Kenney (2017). As shown in Tables 4.3-1 and 4.3-2, Alternative 2 would not directly impact the *Parkinsonia florida-Olneya tesota* vegetation alliance or the FP1 watercourse. For comparison, Alternative 1 would directly impact 6.3 acres of the FP1 watercourse.

As discussed in Section 4.4.3.1, there are many uncertainties associated with assigning impacts to migratory birds to individual components of solar facilities. Impacts are likely to be associated with bird collisions with Project fencing, gen-tie lines, and PV panels. It is known that solar facilities have a higher avian mortalities rate than general background mortality in the open desert, but the cause of that increase risk is unknown (Huso and Fesnock, pers com 2018). Although the magnitude of these impacts, and the overall impact on avian populations, is uncertain, avian impacts associated with Alternative 2 would likely be lower than those of Alternative 1, due to the reduced acreage of solar arrays. However, the longer gen-tie corridor of 3.94 miles associated with Alternative 2 has the potential to result in greater operations and maintenance impacts to migratory birds and bats, through collision with tower structures and overhead lines.

The solar array for Alternative 2 would impact five known locations of kit fox dens, reduced from six in Alternative 1. Impacts to wildlife movement would be lower in Alternative 2 than in Alternative 1 due to the smaller amount of habitat that would be impacted. Thus, a greater amount of habitat would be preserved for intermountain and localized, valley floor wildlife movements.

The APMs and mitigation measures for Alternative 2 would be the same as those described under Alternative 1, with adjustments to reduce the amount of off-site compensatory habitat needed to mitigate impacts for Alternative 2.

4.4.3.3 Alternative 3: Reduced Project Alternative

The types of impacts related to construction, operation and maintenance, and decommissioning on wildlife resources under Alternative 3 would be similar to those described for Alternative 1. The main difference in impacts between Alternative 3 and Alternatives 1 and 2 is that the solar plant site would be smaller, resulting in overall reduced impacts to wildlife habitat. Impacts associated with Alternative 3 include the disturbance of 2,033 acres of habitat for the permanent facilities. An additional 66.1 acres would be temporarily impacted by construction of the access road and temporary construction areas, for a total of 2,099 acres of habitat disturbance. Alternative 3 has a longer gen-tie corridor at 3.94 miles in length, as compared to 2.79 miles for Alternative 1.

Table 4.3-1 shows that Alternative 3 would have a direct impact to 1,870 acres of suitable Mojave desert tortoise habitat. Of the six documented locations of tortoise sign (carcasses) shown in Figure 3.4-1, five would be avoided, and one would be within the disturbance area. Due to the lack of live tortoises documented during protocol-level surveys, it is expected that the tortoise is not a resident species, but rather occasionally traverses portions of the Project site.

Similarly, there are substantially fewer Mojave fringe-toed lizard observations documented within the Alternative 3 footprint, with complete avoidance of the species within the solar plant footprint (Table 4.4-3). Within the gen-tie corridor, the number of Mojave fringe-toed lizard observations would be 35, higher than the 28 observed for the Alternative 1 gen-tie corridor. This is because the gen-tie corridor coincides with the sand dune habitat, and is longer under Alternative 3. Within 150 feet of these documented occurrences, Alternative 3 would directly impact 12 acres of occupied habitat. As shown in Figure 3.4-3, the remainder of the Project area was identified as suitable habitat in the DRECP model, and is therefore considered to be potential habitat. Alternative 3 would directly impact 2,021 acres of this potential habitat.

Potential indirect effects to Mojave fringe-toed lizard habitat could also occur if Alternative 3 were to interfere with the flow of sediment or moisture to the habitat. Habitat for the Mojave fringe-toed lizard is associated with sand deposits, which are present in both alluvial and eolian deposits in the Project area. The floodplain area designated as FP1, shown in Figure 4.3-1, roughly corresponds to the *Parkinsonia florida-Olneya tesota* vegetation alliance mapped by BLM, and is also identified as a ponding area that is critically important for eolian sand systems as a sand source and stabilizing moisture for sand dune systems by Kenney (2017). As shown in Tables 4.3-1 and 4.3-2, Alternative 3 would not directly impact the *Parkinsonia florida-Olneya tesota* vegetation alliance or the FP1 watercourse. For comparison, Alternative 1 would directly impact 6.3 acres of the FP1 watercourse.

As discussed in Section 4.4.3.1, there are many uncertainties associated with assigning impacts to migratory birds to individual components of solar facilities. Impacts are likely to be associated with bird collisions with Project fencing, gen-tie lines, and PV panels. It is known that solar facilities have a higher avian mortalities rate than general background mortality in the open desert, but the cause of that increase risk is unknown (Huso and Fesnock, pers com 2018). Although the magnitude of these impacts, and the overall impact on avian populations, is uncertain, avian impacts associated with Alternative 3 would likely be lower than those of Alternatives 1 and 2, due to the reduced acreage of solar arrays. However, the longer gen-tie corridor of 3.94 miles associated with Alternative 3 has the potential to result in greater operations and maintenance impacts to migratory birds and bats, through collision with tower structures and overhead lines.

The solar array for Alternative 3 would impact five known locations of kit fox dens, reduced from six in Alternative 1. Impacts to wildlife movement would lower in Alternative 3 than in Alternatives 1 and 2 due to the smaller amount of habitat that would be impacted. Thus, a greater amount of habitat would be preserved for intermountain and localized, valley floor wildlife movements.

The APMs and mitigation measures for Alternative 3 would be the same as those described under Alternative 1, with adjustments to reduce the amount of off-site compensatory habitat needed to mitigate impacts for Alternative 3.

4.4.4 Application of CEQA Significance Thresholds

For the purposes of CEQA compliance, the significance of each identified impact of Alternative 1, Alternative 2, or Alternative 3 has been determined. The CEQA Lead Agency is responsible for determining whether an impact is significant and is required to adopt mitigation measures to minimize or avoid each significant impact.

BIO-1) Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS)?

Construction, operation and maintenance, and decommissioning of Alternatives 1, 2, and 3 could result in direct and indirect impacts to special-status species. Potential construction- and operation-related direct and indirect impacts to non-listed special-status species occurring within the Study Area could occur as a result of construction activities. Construction of the solar facility, gen-tie lines, new On-Site Substation, access roads, and O&M buildings would require ground-disturbing activities, including clearing and grading for structure installation work areas, and access construction.

Special-status wildlife: Direct impacts to non-listed wildlife species could occur from mortality of individuals by crushing or vehicle collisions during operation and maintenance activities of Alternative 1, Alternative 2, or Alternative 3, nighttime lighting, wildfires, and human presence and activity. Potential construction- and operation-related direct and indirect impacts to special-status wildlife would be potentially significant. APMs BIO-1 (Environmental Inspection and Compliance Monitoring Program and Plan) and BIO-3 (Construction-Related BMPs), in addition to implementing Mitigation Measures VEG-1 through VEG-8, WIL-3 (Project Notification and Reporting), WIL-8 (American Badger and Desert Kit Fox Protection), WIL-9 (Burrowing Owl Protection and Mitigation), and WIL-12 (Couch's Spadefoot Toad Protection and Mitigation) would be implemented to further reduce impacts. Post-mitigation, impacts would be less than significant. All mitigation measures that are required during construction of Alternative 1, Alternative 2, or Alternative 3 to avoid or minimize impacts to biological resources would also be required during decommissioning activities.

Migratory Birds: The potential impacts of Alternatives 1, 2, or 3 on migratory birds, including an evaluation of data from nearby solar projects, are discussed in Section 4.4.3. There is a potential for direct and indirect impacts to occur to migratory birds through crushing of nests during clearing and grubbing, as well as during construction. Other impacts could include collisions with solar arrays and gen-tie line and structures, loss of nesting and foraging habitat, and disruption of normal breeding behaviors in areas adjacent to the Project from increased noise, ambient light at night, and an increase in the level of human encroachment into the vicinity. However, although these impacts are documented, there is a large amount of uncertainty regarding their effect on total population size. As discussed in Section 4.4.3, the cause of most mortalities at nearby solar facilities is unknown. Based upon the bird surveys conducted on the site and the data from nearby solar projects (McCoy and Blythe), the DQSP is not expected to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS.

Alternative 2 or Alternative 3 would also not be expected to contribute to any adverse impacts to avian species from PLP, since none of the design features have been connected to such impacts. Therefore, Alternative 2 or Alternative 3 will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or the USFWS.

APMs BIO-1 (Environmental Inspection and Compliance Monitoring Program and Plan), BIO-2 (Construction-Related Plans), and BIO-3 (Construction-Related BMPs), as well as Mitigation Measures WIL-3 (Project Notification and Reporting), WIL-7 (Preconstruction Nest Surveys), WIL-9 (Burrowing Owl Protection and Mitigation), and WIL-12 (Couch's Spadefoot Toad Protection and Mitigation) would be implemented to help reduce any potential impacts during construction and operation and maintenance of the gen-tie line and solar array facility. These measures specify pre-construction surveys to identify the presence of potentially affected individuals, date limits to avoid Project activities when protected individuals are present and/or breeding, distance limits to minimize direct impacts and habitat modification, and documentation and reporting requirements. Through these measures, impacts to individuals and habitat of protected species would be reduced to a level less than significant.

BIO-4) Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Wildlife: Although impacts on wildlife movement are anticipated under Alternatives 1, 2, or 3, these impacts would be less than significant with mitigation. The DRECP identifies wildlife corridors and linkages for use in evaluating impacts to wildlife movement. Figure D-1 of DRECP identifies a desert linkage network for landscape wildlife linkages, Figure D-2 identifies multi-species linkages and ACEC boundaries within the East Riverside DFA, and Figure D-16 identifies Tortoise Conservation Areas and Linkages. The Project area is not situated within any important tortoise conservation areas or linkages, and would not interfere with wildlife movement through most of the I-10 underpasses. As shown in Figure 3.4-11 and discussed in Section 3.4.1.2, the Project area does overlap a portion of the California Desert Linkage Design Network and is anticipated to potentially affect usage of the most eastern I-10 underpass. The figure shows that the northwestern corner of the Project area, including the CRSS, parts of the gen-tie line, and a portion of the solar arrays overlies the network. However, the presence of the CRSS and the gen-tie is not expected to affect wildlife movement within the network, as evidenced by the inclusion of the location of the CRSS and multiple associated transmission lines in the network. Solar arrays would affect wildlife movement within the network. Even though, as shown in Figure 3.4-11, the Project solar arrays would occupy only a portion of one branch of the linkage between the Mule Mountains and the McCoy Mountains, that overlap is likely to affect movement between the Mule and McCoy Mountains. Most of the animals expected to move across the Project are considered common in California, with the exception of Mojave desert tortoise. Common species were found on-site in relatively low numbers, as well as in adjacent areas. The Mojave desert tortoise is not a resident species onsite, due to the lack of observations of live tortoises during protocol-level surveys. The incidental observation of tortoise tracks within the gen-tie line corridor north of the sand dunes suggests that the species only occasionally traverses portions of the site.

Regional habitat connectivity would be reduced by implementation of Alternatives 1, 2, or 3. However, much of the land surrounding the site is expected to remain as natural desert plant communities for the foreseeable future, which would allow regional movement by common terrestrial wildlife species, as well as the Mojave desert tortoise, to continue outside the perimeter of Alternatives 1, 2, or 3 without significant impediment once construction is completed.

Operation of Alternatives 1, 2, or 3 would not result in any direct impacts to wildlife movement in addition to those already described for construction. Mitigation Measures WIL-1 (Mojave desert

tortoise fencing), WIL-4 (Mojave desert tortoise habitat acquisition), and WIL-9 (burrowing owl habitat acquisition) would reduce remaining potential impacts to a less than significant level by directing wildlife movement around the Project (via the site perimeter fencing), and building upon a consolidated block of conserved open space suitable for maintaining movement corridors (via the Project's habitat acquisition contribution). Post-mitigation, impacts would be less than significant.

Migratory Birds: To the east of the Alternatives 1, 2, or 3 area is the Lower Colorado River Valley. The Lower Colorado River Valley is in the Pacific Flyway, one of the four major migration flyways in North America, and is a globally important bird area (IBA) running from Alaska to Patagonia and stretching inland from the Pacific Ocean to encompass parts of Montana, Wyoming, Colorado and New Mexico (Audubon 2011). As previously mentioned, migratory bird surveys and the Territory and Occupancy Survey, indicated that both the diversity and density of migratory birds and raptors was relatively lower within the Project site, compared to adjacent areas. However, many bird species migrate at night, including passerines and waterbirds, which may not have been adequately accounted for in the daytime surveys conducted for the Project.

Due to approximately 90,000 acres of existing suitable forage land on irrigated agricultural land within the Palo Verde Valley east of Alternatives 1, 2, or 3, and the distance of the alternatives from the Colorado River, it is assumed that migratory birds would only incidentally use the Alternative 1, 2, or 3 Project areas for forage land, and that these lands are of lesser value and importance for migratory bird foraging compared to lands closer to the River.

Wetlands, lakes, and streams are all documented potential "hot spots" for avian risk due to collision with facilities because water is often used by birds to forage or congregate (APLIC 2006). There is no standing water in the Project area, except briefly following heavy rains. The Applicant has proposed use of ponds to store dust control water during construction. Such ponds would only be authorized following an analysis of the feasibility of using tanks, as specified in WIL-13 (Development of Ponding Area). Potential impacts will be mitigated through APMs BIO-1 (Environmental Inspection and Compliance Monitoring Program and Plan), as well as Mitigation Measure WIL-3 (Project Notification and Reporting). These measures would be implemented to help reduce potential impacts during construction and operation and maintenance of the gen-tie line and solar array facility to less than significant.

BIO-5) Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Alternatives 1, 2, or 3 would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Regional resource planning documents prepared by Federal, state, and local agencies were reviewed, including the CDCA Plan, the RCGP, and USFWS Recovery Plans. These documents were reviewed to confirm that Alternatives 1, 2, or 3 would not conflict with and would have no impact on any local policies or ordinances protecting biological resources.

BIO-6) Would the Project conflict with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan?

Alternatives 1, 2, or 3 would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. This is because no conservation plans (local, regional, or state) encompass the Study Area. Alternatives 1, 2, or 3 would have no impact on adopted habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans.

BIO-7) Would the Project substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

Based on survey work and database searches that were conducted for the Project, signs of one Federally listed threatened species, the Mojave desert tortoise, and the state-listed threatened Swainson's hawk, were documented onsite. Because of the lack of observations of live tortoises or burrows during the protocol-level Project surveys, the Mojave desert tortoise is not expected to be a resident species onsite. However, since it is known from the region along the foothills of the McCoy Mountains (north of the site) and the Mule Mountains (south of the site), the presence of tortoise tracks on the northern edge of the sand dunes along the gen-tie corridor indicates the tortoise occasionally traverses portions of the site. The Swainson's hawk occurs as a foraging species during migration. However, the Swainson's hawk would not be expected to nest onsite. Therefore, Alternatives 1, 2, or 3 would not substantially reduce the number or restrict the range of either of these threatened species.

Based on a review of available information, review of existing databases, reconnaissance surveys and protocol surveys conducted as part of impacts assessment for the DQSP, fifteen non-listed special-status reptile, avian, and mammal species or their sign are associated with Alternatives 1, 2, and 3. These species include the following: Mojave fringe-toed lizard, Cooper's hawk, western burrowing owl, ferruginous hawk, Vaux's swift, northern harrier, peregrine falcon, loggerhead shrike, pallid bat, western mastiff bat, pocketed free-tailed bat, cave myotis, American badger, and desert kit fox.

Habitat destruction is thought to cause greater reductions in bird and other wildlife populations than any other factor, and is still the most serious long-term threat (APLIC 2006). Based on Project migratory bird surveys and Golden Eagle Territory and Occupancy Surveys, overall avian diversity and density is lower within the Project footprint, compared to outside of the Project. While these surveys were not designed to specifically document nesting of non-raptor avian species, no incidental observations of non-raptor avian nesting, nor any direct observation of raptor nesting, have been documented within the Project site. While the Project has not conducted any population viability analyses, the relatively low densities of migratory bird species and other species such as the Mojave desert tortoise, as previously noted, suggests that implementation of the Project would not likely expose any animal species to significant risk with regard to self-sustaining populations. Therefore the construction of Alternative 1 would not substantially reduce the habitat for birds or migratory birds that would cause the population to drop below self-sustaining levels, threaten to

eliminate the avian community or substantially reduce the number or restrict the range of endangered, rare, or threatened species.

The direct impact of Alternatives 2 and 3 on occupied and potential Mojave fringe-toed lizard habitat would be reduced compared to Alternative 1. The Alternative 2 and 3 solar plant would completely avoid direct impacts to known fringe-toed lizard locations. Direct impacts to the species along the Alternative 2 and 3 gen-tie routes would slightly increase, relative to Alternative 1.

Various special-status mammal species, including several bat species, as well as the American badger and desert kit fox, might be impacted by the Project. However, no bat roosts were documented within the Project footprint, and direct take of the badger and kit fox would be avoided to the extent feasible through passive relocation. While habitats for these species would be lost, the displaced individuals would be able to utilize adjacent habitats. These species are present throughout the region. Therefore, the Project would not cause these species populations to drop below self-sustaining levels.

Potential impacts will be mitigated through Mitigation Measures WIL-1 and WIL-2 (Desert Tortoise Surveys and Desert Tortoise Translocation Plan), WIL-7 (Preconstruction Nest Surveys), WIL-8 (American Badger and Desert Kit Fox Protection), WIL-9 (Burrowing Owl Protection and Mitigation), WIL-10 (Compensatory Mitigation for Mojave Fringe-toed Lizard Habitat Losses), and WIL-12 (Couch's Spadefoot Toad Protection and Mitigation). These measures would be implemented to help reduce potential impacts during construction and operation and maintenance of the gen-tie line and solar array facility to less than significant.

4.4.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.4 would be maintained. No disturbance of site soils would occur, and no gen-tie line would be constructed, and therefore Alternative 4 would not result in any impacts associated with biological resources.

4.4.6 Cumulative Impacts

The geographic scope for this cumulative impact analysis considers the incremental effects of the analyzed alternatives relative to other past, present, and reasonably foreseeable projects that affect wildlife. For wildlife resources, the geographic scope of analysis is based on species distribution and landforms surrounding the Project site and the natural boundaries of the resource affected, rather than jurisdictional boundaries.

The analysis considers potential effects at different scales for different species, with the analysis generally concentrating on wildlife resources in the Palo Verde watershed and a portion of the Chuckwalla Valley watershed in eastern Riverside County. This scale was used to analyze cumulative effects on Mojave desert tortoise, Mojave fringe-toed lizard, migratory birds, western burrowing owl, American badger, kit fox, and bat species. The geographic scope for assessing cumulative effects to Mojave desert tortoise and golden eagle were somewhat larger, as described

below. In addition to short-term construction impacts, the Project would have ongoing operational impacts on some biological resources. Therefore the temporal scope of the cumulative effects analysis for wildlife includes the construction, operation and maintenance, and decommissioning phases of the Project.

Table 4.4-6. Cumulative Impacts to Wildlife Habitat

Wildlife Species Cumulative Study Area	Acreage within Study Area	Impacts of Present and Future Projects	Impacts of Alternative 1	Impacts of Alternative 2	Impacts of Alternative 3
Mojave desert tortoise <i>Colorado Desert Recovery Unit</i>	2,600,000 acres	39,444 acres ¹ (1.5%)	3,575 acres (9.1% of total cumulative impact)	2,605 acres (6.6% of total cumulative impact)	1,870 acres (4.7% of total cumulative impact)
Mojave fringe-toed lizard <i>Occupied sand dune/ sand sheet habitat in the Palo Verde Valley</i>	12,911 acres	228 acres ² (1.8%)	78 acres (34% of total cumulative impact)	12 acres (5.3% of total cumulative impact)	12 acres (5.3% of total cumulative impact)
Golden eagle ³ <i>Foraging Habitat within 10 mile buffer</i>	287,590 acres	39,444 acres ¹ (13.7%)	3,831 acres (9.8% of total cumulative impact)	2,833 acres (7.2% of total cumulative impact)	2,099 acres (5.3% of total cumulative impact)
Burrowing owl / American badger/ desert kit fox <i>BLM-identified habitat in the Palo Verde watershed</i>	286,084 acres	27,923 acres ¹ (9.8%)	3,831 acres (13.8% of total cumulative impact)	2,833 acres (10.1% of total cumulative impact)	2,099 acres (7.5% of total cumulative impact)

Source:

1 – Acreage for Mojave desert tortoise, Golden eagle, and burrowing owl/American badger/Desert kit fox estimated using impacts from Present/Future projects from Table 3.4-2 in Modified Blythe EIS (BLM 2015), which already includes the Proposed Action acreages for DQSP.

2 – Acreage for MFTL estimated from Table 4.4-3 in McCoy EIS (BLM 2012b), plus highest potential acreage (Alternative 1) for DQSP.

3 – Impact is to foraging habitat only

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

A discussion of regional impacts to vegetation alliances and associated wildlife habitat was provided in Section 4.3.6, and is not repeated in this section. This section provides a detailed discussion of the effects of past, present, and future projects to wildlife resources in the Project vicinity.

Those areas in eastern Riverside County where existing and cumulative projects occur or are anticipated provide habitat for numerous special-status wildlife species, including Mojave desert tortoise, Mojave fringe-toed lizard, golden eagle, burrowing owl, American badger, desert kit fox, and Desert bighorn sheep, among others. Tables 4.1-1 and 4.1-2 identify those existing and reasonably foreseeable projects, respectively, in the cumulative effects study area. These include other proposed or approved renewable energy projects, BLM authorized actions or activities,

proposed or approved projects within the counties' jurisdictions, and other actions/activities that Lead Agencies consider reasonably foreseeable. Generally, existing and cumulative projects have been sited outside of many sensitive areas that support these species, which include the ACECs, wilderness areas, and other Special Designation areas discussed in Section 4.16. However, substantial wildlife populations occur outside of these managed and protected areas, and are vulnerable to habitat loss and degradation, or other threats. While the Project is located within the NECO planning area, it is not located within the boundaries of any ACEC or Chuckwalla Unit of Critical Habitat for Mojave desert tortoise.

Land uses in the cumulative analysis area historically have been altered by human activities, resulting in conversion of undeveloped land and habitat loss, fragmentation, and degradation. Reasonably foreseeable future projects that could impact biological resources in the cumulative impacts area characterize overall development trends in the Palo Verde Valley and nearby Chuckwalla Valley. Much of the future development in the area is dominated by renewable energy projects. Major renewable projects require extensive access roads and new transmission lines to tie into the existing electrical grid system.

Other projects in the cumulative study area include several transmission lines and nonrenewable energy development, as well as residential and commercial development. In addition to one-time construction impacts, many of the cumulative projects would have ongoing operational impacts on wildlife resources. Therefore, all projects that might contribute impacts over time in the cumulative area are considered for this analysis. This would include nonrenewable energy, transmission lines, wind power, and solar power projects.

General threats to common and special-status wildlife species in the cumulative effects study area include the fragmentation of habitat from roads and urban development, the effects of historic livestock grazing on wildlife forage structure and availability, the effects of military training activities, and agricultural development. In the context of other existing and reasonably foreseeable projects, the proposed Project has the potential to further reduce wildlife habitat and incrementally degrade adjacent habitat. Thus, the Project would contribute to the cumulative loss and degradation of habitat for Mojave desert tortoise, Mojave fringe-toed lizard, and other species in the Palo Verde watershed.

Wildlife Habitat

The development of numerous large-scale projects such as other solar generation facilities would result in the conversion of wildlife habitat to industrial and commercial uses. Table 4.4-6 presents the estimated area of available wildlife habitat in the cumulative effects study areas, and the cumulative impacts on each species from existing projects and foreseeable future projects. Existing and future impact areas were derived using the list of existing and reasonably foreseeable projects in the Palo Verde Valley and nearby Chuckwalla Valley, as identified in Section 4.1.

The total projected habitat loss in the cumulative study area for wildlife resources includes approximately 1.5 percent of habitat for Mojave desert tortoise, 3.3 percent of habitat for Mojave fringe-toed lizard in the Palo Verde Valley, 13.7 percent of foraging habitat for golden eagle, and 9.8 percent of habitat for burrowing owl, American badger, and desert kit fox (Table 4.4-6). Alternatives 1, 2, and 3 would contribute to cumulative impacts on these resources. However, implementation of APM BIO-1 (Environmental Inspection and Compliance Monitoring Program and Plan), BIO-2 (Construction-Related Plans), BIO-3 (Construction-Related BMPs), and BIO-5

(Integrated Weed Management Plan), along with Mitigation Measures VEG-1 through VEG-8, VEG-10 (Measures for Riparian Habitat and State Waters), WIL-1, WIL-2, and WIL-4 through WIL-10, would reduce impacts to sensitive wildlife species and their habitat and provide that impacted habitat is adequately mitigated with equivalent habitat that would be protected off-site. With implementation of these Project-specific mitigation and protection measures, implementation of similar measures as part of each project in the cumulative scenario, and compliance with state and Federal laws, the cumulative effects to wildlife habitat between the Project and past, present, and foreseeable projects would be less than significant (impact BIO-1 and BIO-7).

Mojave Desert Tortoise

The cumulative effects study area for Mojave desert tortoise considered existing and future projects in the Colorado Desert Recovery Unit planning area, as defined in the Desert Tortoise Revised Recovery Plan (USFWS 2011a). The Recovery Plan focuses on Mojave desert tortoise populations within each of five distinct recovery units, with the fundamental recovery goal of ensuring sufficient population size and stability within an ample amount of protected habitat in each area. The Colorado Desert Recovery Unit includes the Joshua Tree National Park TCA and Chuckwalla TCA, and includes both the Chuckwalla Valley and Palo Verde Valley. USFWS-designated critical habitat for Mojave desert tortoise occurs within the Chuckwalla Critical Habitat Unit, which significantly overlaps the Joshua Tree National Park and Chuckwalla TCAs.

While Mojave desert tortoises occur in low densities in the Palo Verde Valley, the Project site is not located within or between lands that are specifically managed for Mojave desert tortoise conservation. The Joshua Tree National Park TCA, Chuckwalla TCA, and designated critical habitat for Mojave desert tortoise are greater than 10 miles west of the Project site and would not be impacted by the Project. A 2.6 million-acre study area was identified for Mojave desert tortoise in the Colorado Desert Recovery Unit, of which approximately 39,444 acres (1.5 percent) would be impacted by future projects (Table 4.4-6). Alternative 1 would contribute approximately 9.1 percent of the total cumulative impact from future projects, affecting about 0.14 percent of available Mojave desert tortoise habitat in the recovery unit. Under Alternative 2 the Project would contribute 6.6 percent of the total impact from future projects, affecting about 0.1 percent of available Mojave desert tortoise habitat. Alternative 3 would contribute approximately 4.7 percent of the total cumulative impact from future projects, affecting about 0.1 percent of available Mojave desert tortoise habitat.

As discussed in USFWS (1990) and Allison and McLuckie (2018), impact to the acreage of habitat is not the only contributor to cumulative impacts to Mojave desert tortoise populations. The USFWS (1990) cited mortality of individual desert tortoises to disease (URTD), increased predation by common ravens, collection by humans for pets or consumption, and collisions with vehicles on paved and unpaved roads. Although projects have impacted 1.5 percent of habitat within the Colorado Desert Recovery Unit, Allison and McLuckie (2018) estimate that the population in the unit declined from 3,319 in 2004 to 1,403 in 2012 (Allison and McLuckie 2018).

Direct and indirect effects to tortoises and their habitat would be offset through the application of APM BIO-1 (Environmental Inspection and Compliance Monitoring Program and Plan), BIO-2 (Construction-Related Plans), and BIO-3 (Construction-Related BMPs), and the implementation of Mitigation Measures VEG-1 through VEG-8, WIL-1 through WIL-5. The loss of tortoise habitat and direct and indirect effects to this species are anticipated to result in cumulative effects on populations; however, the implementation of the required protection measures that include

translocation of Mojave desert tortoises, compensatory mitigation, and site restoration following decommissioning would ensure that the loss of tortoise habitat is adequately compensated for and comparable or higher quality habitat would be protected off-site. With implementation of these measures, it is expected that the contribution of the Project to cumulative effects on Mojave desert tortoises would not be cumulatively considerable (impact BIO-7).

Mojave Fringe-toed Lizard

The analysis of cumulative Project effects to Mojave fringe-toed lizard habitat focused on known and CNDDDB-documented populations within the Palo Verde Valley. In these areas, populations are dependent upon areas with fine aeolian sand that occur in association with dunes, margins of dry lakes and washes, and isolated sand patches. The cumulative effects analysis identified approximately 12,911 acres of occupied Mojave fringe-toed lizard habitat in the cumulative study area, of which approximately 228 acres (1.8 percent) occurs in areas where future projects are proposed (Table 4.4-6). Under Alternative 1, approximately 63 acres of occupied habitat would be disturbed for the solar field, and another 15 acres would be disturbed in association with the gentle line. This represents approximately 0.6 percent of available Mojave fringe-toed lizard habitat that was identified in the cumulative study area and represents a contribution of 34 percent of the total cumulative effect on this resource. The implementation of APM BIO-1 (Environmental Inspection and Compliance Monitoring Program and Plan), BIO-2 (Construction-Related Plans), and BIO-3 (Construction-Related BMPs), along with Mitigation Measures VEG-1 through VEG-8, and WIL-10 would minimize impacts to sensitive dune and sand sheet habitat and provide suitable compensatory habitat for habitat losses. With implementation of the above-mentioned BMPs, in addition to protection through the implementation of Project mitigation measures, the contribution of the Project to cumulative effects on Mojave fringe-toed lizard would not be cumulatively considerable (impact BIO-7).

Migratory Birds

The construction and operation of large-scale solar generation projects in the region, including Desert Sunlight, Genesis, McCoy, and Blythe, have contributed to cumulative impacts on migratory bird species through loss of habitat, as well as through increased mortality as a result of the operation and maintenance of the facilities. Based on a review of the mortality monitoring studies for these solar facilities, it can be inferred that the Project would also contribute to cumulative impacts to migratory birds by increasing impacts associated with collision with the proposed development features. In the 2016 to 2017 monitoring year, an estimated total of 1,936 fatalities occurred in the surveyed areas at Desert Sunlight, McCoy, and Blythe. Based on the monitoring data for these projects, the DQSP is likely to contribute to increase avian mortality through collision with PV panels, entanglement in netting, drowning, and an incremental loss of habitat.

Direct impacts to actively breeding birds would be avoided through the implementation of measures that would provide consistency with Fish and Game Code §§3503.5 and 3511, and the Migratory Bird Treaty Act. Under these laws, the removal or disturbance of active nests is prohibited. With implementation of APM BIO-1 (Environmental Inspection and Compliance Monitoring Program and Plan), BIO-2 (Construction-Related Plans), and BIO-3 (Construction-Related BMPs), and Mitigation Measures VEG-1 through VEG-8, WIL-6, WIL-7, WIL-9, and WIL-13 which require a Bird and Bat Conservation Strategy and preconstruction nesting bird

surveys, the Project would not impact nesting birds other than those that are individually discussed in this Final PA/EIS/EIR (e.g., burrowing owl). Other future projects would be required to implement similar measures to ensure compliance with Federal and state bird protection regulations.

Golden Eagle

The cumulative analysis for golden eagle considered the potential for Project impacts to interact with impacts caused by past, present, and reasonably foreseeable future projects within 10 miles of the Project site to cause or contribute to cumulative effects. The 10-mile radius is consistent with USFWS guidance for inventorying golden eagles that occur near a specific project (Pagel et al. 2010).

Based on a review of known and historic golden eagle breeding sites in the 10-mile golden eagle study buffer, none of the cumulative projects would impact golden eagle breeding sites. However, many of the projects are located or proposed within natural habitat that provides foraging opportunities for golden eagles. A GIS-based analysis identified 287,590 acres of potentially suitable golden eagle foraging habitat within 10 miles of the Project site. Within that area, present and future projects, including the DQSP, would impact approximately 39,444 acres (13.7 percent) of this potential foraging habitat. The Proposed Action would contribute 9.8 percent of the total projected cumulative impact.

Following USFWS guidance, the loss of potential golden eagle foraging habitat would be considered significant if losses occurred within 1.0 mile of an active nest. However, no active nests are known within 1.0 mile of the Project and few if any nests are known near other projects considered in the cumulative scenario. Few (if any) impacts are anticipated to golden eagle nesting sites generally because this species tends to regionally nest in remote mountainous areas where no active projects are proposed. Cumulative effects to the golden eagle between the Project and past, present, and foreseeable projects would be less than significant (impact BIO-7).

Western Burrowing Owl, American Badger, and Desert Kit Fox

As characterized by the NECO Plan Amendment to the CDCA Plan (BLM 2002), the Palo Verde watershed provides extensive habitat for western burrowing owl, American badger, and desert kit fox. While each species has its own specific habitat requirements, there is considerable overlap in the types of habitat used by these species. The cumulative analysis of effects to these species focused on potential habitat in the Palo Verde watershed, as mapped in the NECO Plan Amendment to the CDCA Plan. A GIS-based analysis identified approximately 286,084 acres of potential habitat in the Palo Verde watershed. Future projects would impact approximately 27,923 acres (9.8 percent) of potentially suitable habitat within this area that supports the *Larrea tridentata* and *Larrea tridentata-Ambrosia dumosa* alliances and unvegetated desert pavement; with the Proposed Action contributing approximately 13.8 percent of that total cumulative impact (Table 4.4-6).

The cumulative projects implemented in undeveloped areas would presumably result in impacts to burrowing owl, American badger, and desert kit fox similar to the Project. Such effects include the direct loss of suitable habitat, loss of individual animals, or indirect effects from human presence that result in changes to habitat quality during construction, operation and maintenance, and decommissioning. The implementation of measures identified to protect American badger and desert kit fox (WIL-8) and protect burrowing owls and mitigate habitat losses (WIL-9) would

reduce Project impacts. With implementation of Project-specific mitigation and protection measures, as well as adherence to BMPs as part of each project in the cumulative scenario, and compliance with state and Federal laws, the cumulative effects to burrowing owls, American badger, and desert kit fox between the Project and past, present, and foreseeable projects would be less than significant (impact BIO-7).

Desert Bighorn Sheep and Burro Deer

As depicted in Figure 3.4-10, the Project is not located within a Desert bighorn sheep WHMA and would not result in the loss of habitat for this species within a WHMA. Within the Palo Verde Valley, the Project occurs in close proximity to a bighorn sheep WHMA located in the Mule Mountains. Should the Mule Mountains become occupied by this species at a future time, the Project may contribute to cumulative actions that would impact potential bighorn sheep movement corridors.

Habitat Connectivity and Wildlife Movement

Fencing that is proposed around the Project, other local solar projects, and I-10 create barriers to wildlife movement that would alter, but not likely impede, the movement of large wildlife species such as Desert bighorn sheep, burro deer, mountain lion, or other highly mobile species. For these wide-ranging species, the cumulative projects are not expected to present a barrier to regional movement, because these animals have the ability to move outside of the fence line of the projects. In addition, the largest impact to wildlife movement associated with the cumulative projects is expected to be that posed by I-10. The contribution of the Project to the larger cumulative impact posed by the highway is expected to be minimal (impact BIO-4).

It is anticipated that fencing of the cumulative projects would pose an impediment to movement of smaller species, such as the Mojave desert tortoise, near the project sites. However, the Project site does not overlap with any designated Wilderness Areas, ACECs, TCAs, desert tortoise linkages, or WHMAs. In addition, the DQSP site was included in the BLM's draft Solar PEIS recommendations for the Riverside East Solar Energy Study Areas due to the area's low potential for substantial resource conflicts relative to other considered locations.

The DRECP identifies wildlife corridors and linkages for use in evaluating the application of CMAs for the protection of biological resources. Figure D-1 of DRECP identifies a desert linkage network for landscape wildlife linkages, Figure D-2 identifies multi-species linkages and ACEC boundaries within the East Riverside DFA, and Figure D-16 identifies Tortoise Conservation Areas and Linkages. The Project area is not situated within any of these linkages.

Figure 3.4-10 shows the location of the Project with respect to the NECO multi-species WHMA. Figure 3.4-1 shows the location of the Project with respect to the DRECP designated TCAs, High Priority Desert Habitat, and desert tortoise linkages shown in Figure D-16 of DRECP, and with respect to the California Desert Linkage Network, and with respect to the bridges and culverts which facilitate wildlife movement, including that of the desert tortoise, underneath I-10. In general, the Project area is situated to the east of these various linkage areas. As shown in Figure 3.4-11, the Project area is not situated within the TCAs, High Priority Habitat, or linkages shown in Figure D-16 of DRECP. Figure 3.4-10 shows that the CRSS is situated within the NECO multi-species WHMA, so a few hundred feet of the end of the Project gen-tie line would lie within the WHMA. Figure 3.4-11 shows that the northwestern portion of the solar facility and much of the gen-tie line are situated within a branch of the California Desert Linkage Network and is

anticipated to potentially affect usage of the most eastern I-10 underpass. However, the bulk of the overlap of the Project with these linkages is associated with the gen-tie line, not the solar arrays. In both cases, the CRSS itself is situated within the linkage area, and it is therefore impossible for any power facility to connect into the CRSS without occupying a portion of these linkages. In general, the gen-tie lines do not involve fencing, and are not expected to present a barrier to wildlife movement within this area. Of the various linkages, only the California Desert Linkage Network is partially overlain by the solar arrays, as shown on Figure 3.4-11. Even though the overlay involves only one branch of the linkage, and the solar array does not completely block this branch, the overlap is likely to affect movement between the Mule and McCoy Mountains. Because the Project is situated on the periphery of the various linkages, and would not completely block any of them, the project is unlikely to contribute to cumulative impacts to the linkages.

The Mojave desert tortoise occurs in low population densities in the Palo Verde Valley, with sparse populations noted in the Project area. It is expected that tortoise habitat located within the cumulative analysis area will continue to support tortoise populations and that tortoises will be physically able to circumnavigate the Project and other foreseeable solar development. Tortoises would not be able to directly traverse the solar project sites, but the remaining adjacent open space is of sufficient size that remaining tortoise populations may be sustained and would not be isolated from the regional population. Additionally, habitat on the sites would be reconnected to adjacent lands during Project decommissioning. With substantial habitat connectivity remaining following the cumulative development scenario, the impediment to wildlife movement presents an adverse, though not substantial impact, to the Mojave desert tortoise.

Direct and indirect effects to tortoises would be reduced and mitigated through the application of APM BIO-1 (Environmental Inspection and Compliance Monitoring Program and Plan), BIO-2 (Construction-Related Plans), and BIO-3 (Construction-Related BMPs), and the implementation of Mitigation Measures WIL-1 through WIL-10. The contribution of the Project to cumulative impacts on tortoise movement would not be cumulatively considerable (impact BIO-4).

Local Policies or Ordinances Protecting Wildlife Resources

The Project is not proposed within the boundaries of any adopted habitat conservation plan or natural community conservation plan. The Project site is within the CDCA and is within the planning boundaries of the NECO Plan Amendment to the CDCA Plan. The Project was planned and designed in coordination with BLM with the intent of providing consistency with the NECO Plan and CDCA Plan. The Project would not contribute to a conflict with any local policies or ordinances protecting biological resources (impact BIO-5) or with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan (impact BIO-6).

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The overall cumulative impacts associated with implementation of Alternative 2 would be similar in type as described for Alternative 1. For the impacts to Mojave desert tortoise, burrowing owl, American badger, and desert kit fox, Alternative 2 would result in a decrease of approximately 980 acres of habitat impacts. This decrease in the scale of the impacts would also represent a similar decrease in the contribution by the Project to cumulative impacts to these species.

The decrease in direct impacts to the Mojave fringe-toed lizard from implementation of Alternative 2 is substantial compared to Alternative 1, since there would be a decrease of approximately 66 acres (or an 85 percent decrease) of occupied Mojave fringe-toed lizard habitat impacted with this alternative. Therefore, the contribution to cumulative impacts would also be decreased. Similarly, the contribution to cumulative impacts on common and other special-status species would also occur with the implementation of Alternative 2.

The APMs and Mitigation Measures outlined for Alternative 1 would also apply to Alternative 2. Implementation of these measures would reduce impacts to sensitive wildlife species and their habitat and provide that impacted habitat is adequately mitigated with equivalent habitat that would be protected off-site.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The overall cumulative impacts associated with implementation of Alternative 3 would be similar in type as described for Alternatives 1 and 2. For the impacts to Mojave desert tortoise, burrowing owl, American badger, and desert kit fox, Alternative 3 would result in a decrease of approximately 1,700 acres of habitat impacts compared to Alternative 1, and a decrease of approximately 740 acres relative to Alternative 2. The decrease in the scale of the impacts would also represent a similar decrease in the contribution by the Project to cumulative impacts to these species.

The decrease in direct impacts to the Mojave fringe-toed lizard from implementation of Alternative 3 is substantial compared to Alternative 1, since there would be a decrease of approximately 66 acres (or an 85 percent decrease) of occupied Mojave fringe-toed lizard habitat impacted with this alternative. Therefore, the contribution to cumulative impacts would also be decreased. The contribution to cumulative impacts on common and other special-status species would also occur with the implementation of Alternative 3.

The APMs and Mitigation Measures outlined for Alternative 1 would also apply to Alternative 3. Implementation of these measures would reduce impacts to sensitive wildlife species and their habitat and provide that impacted habitat is adequately mitigated with equivalent habitat that would be protected off-site.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. Alternative 4 would not contribute to cumulative impacts to wildlife resources.

4.4.7 Residual Impacts

The Proposed Action and the other two action alternatives would impact Mojave desert tortoise habitat, and possibly to Mojave fringe-toed lizard, burrowing owl, and other nesting birds and desert kit fox, which may occur on site. Relatively lesser impacts to American badger and bat species would be anticipated. As discussed in the sections above, the recommended avoidance and minimization measures as well as compensatory mitigation would effectively offset direct,

indirect, and cumulative impacts to wildlife resources and assure compliance with state and Federal laws. It is expected that very limited residual adverse effects would remain after mitigation measures have been applied and that these residual impacts, if any, would not be significant.

4.5 Cultural Resources

4.5.1 Methodology for Analysis

4.5.1.1 Introduction

Evaluation of potential impacts of the Proposed Action and alternatives on cultural resources is based in part on review of legal responsibilities established under NEPA (42 USC §§4321, 4331-4335), the NHPA, and other relevant authorities. To carry out NEPA, the Federal government has a “continuing responsibility...to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may...preserve important historic, cultural, and natural aspects of our national heritage....” (42 USC §4331(b)(4)). NEPA requires the Federal agency to take a “hard look” at the impacts on cultural resources associated with a proposed action and alternatives. The analysis takes into account direct, indirect, and cumulative effects.

For purposes of NEPA, this Final PA/EIS/EIR includes information gathered as part of the NHPA §106 process about historic properties and the potential effects to such properties from the proposed undertakings, i.e., the BLM’s decision whether or not to issue the requested ROW grant or approve a CDCA Plan Amendment. Section 106 of the NHPA requires that the agency take into account the effects of undertakings on historic properties, defined as any district, site, building, structure, or object that is included in or eligible for inclusion in the NRHP; and to afford the ACHP a reasonable opportunity to comment. The steps of the §106 process are: (1) identification of historic properties within the APE for the proposed undertaking; (2) assessment of the proposed undertaking’s potential effects on identified properties; and (3) resolution of any adverse effects. Each step requires consultation with the SHPO, interested Native American tribes, local governments, and other identified consulting parties.

Area of Potential Effects

The regulations implementing NHPA §106 define the APE as the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist. The APE is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking (36 CFR §800.16(d)). In addition, the APE may be buffered for purposes of cultural resources inventory to facilitate the identification of resources that may be located in proximity to the APE and indirectly affected by a proposed project or to allow for redesign of project components to avoid direct effects to cultural resources. The current APE, including the one-mile buffer for indirect APE and an expanded area to incorporate the Mule Tanks Discontiguous Rock Art District, is illustrated on Figure 3.5-1. SHPO concurred with the APE in 2014, and with a small expansion of the APE where the gen-tie enters the CRSS in 2018. The APE for the Project has been defined as:

1. For direct effects, the APE is defined as all areas where physical Project activities would occur, including the full extent of all Project components and alternatives. This consists of the area included within the ROW grant for the solar energy generating plant and associated facilities, roads, and transmission lines.
2. For indirect effects, the APE is defined as a one-mile buffer beyond the ROW grant, to take into consideration resources whose settings could be adversely affected by the proposed

Project development. In addition, for this Project, the indirect APE has been expanded beyond the one-mile buffer, in response to tribal and archaeological concerns, to address indirect impacts to a NRHP-listed district located in the vicinity of the Project. There are no adverse impacts to NRHP-eligible or listed sites within the indirect APE.

Alternative 2, the Resource Avoidance Alternative, and Alternative 3, the Reduced Project Alternative, present a reduced Project footprint within the APE described above. Some NRHP- and CRHR-eligible sites are still within the direct APE; however, the Project components have been moved in an attempt to avoid the sites. Although both alternatives would reduce the number of sites that would be directly impacted, there would be indirect impacts to these sites, including surrounding them with Project components such as roads, solar panels, fences, and other structures. However, the sites would remain accessible for future research.

4.5.1.2 Cultural Resources Evaluation of Historical Significance and Effects

A key part of any cultural resources analysis under NEPA and NHPA §106 is to determine whether the cultural resources located within the Project APE are historically significant. Subsequent effects assessments are made for those cultural resources that are determined to be historically significant.

Evaluation of Historical Significance

NHPA §106

Effects on historic properties are considered during Federal undertakings chiefly under NHPA §106 through its implementing regulations, 36 CFR Part 800. This includes consideration of effects on properties of traditional religious and cultural significance to Native American tribes. The §106 process requires Federal agencies to consider the effects of their undertakings on any historic district, site, building, structure, or object that is included in or eligible for inclusion in the NRHP and to afford the ACHP a reasonable opportunity to comment on such undertakings, 36 CFR §800.1(a).

The BLM has made NRHP determinations of eligibility and findings of effect for all cultural resources, and has requested SHPO concurrence with those determinations and findings.

Indirect APE

Two NRHP and CRHR listed sites are located within the indirect APE. P-33-000504/CA-RIV-504 and P-33-000773/CA-RIV-773 make up the Mule Tank Discontiguous Rock Art District.

Two additional sites are located within the indirect APE. These two sites are transmission lines located within the indirect APE along the southeastern boundary of the DQSP. These lines are the Pilot Knob–Blythe 161-kV transmission line (P-33-11110) and the Blythe–Niland 161-kV transmission line (P-33-012532/CA-RIV-7127H). The Pilot Knob–Blythe 161-kV transmission line (P-33-11110) is a 64.4-mile-long line made of H-frame wooden poles built in 1951 that parallels the 2-mile-long boundary of the DQSP. The Blythe–Niland 161-kV transmission line (P-33-012532/CA-RIV-7127H) is a line of similar wooden-pole H-frame construction built in the 1940s and 1950s and located in the same corridor. These transmission lines have been determined to not be NRHP eligible during previous projects.

Direct APE

Eighteen additional NRHP- and CRHR-eligible sites are located within the APE. These include six sites that are eligible prehistoric trails that lead into the district. Ten prehistoric sites (thermal and other rock features) and 2 multi-component sites (1 trail with debris scatter, and 1 artifact and debris scatter) have been determined to be as eligible for the NRHP and CRHR.

According to SRI, CA-RIV-1821 may be related to additional sites as well (CA-RIV-24356, CA-RVI-24307, CA-RIV-24283, CA-RIV-24459, CA-RIV-24508, CA-RIV-24451, and CA-RIV-24385) and further mitigation at these sites may be required. The remaining 266 archaeological and historic resources have been determined not eligible for the NRHP or CRHR.

If the Proposed Action is the selected alternative, a NHPA §106 Memorandum of Agreement (MOA) would be developed for the purpose of resolving adverse effects to ten historic properties. This number may vary depending on which alternative is chosen and the results of the BLM's consultation with Native American tribes. The MOA would be developed by the BLM in consultation with the ACHP, SHPO, the Applicant, Riverside County, interested Native American tribes, and any other consulting parties, as appropriate. The MOA would describe the adverse effects to the ten historic properties, would include measures to resolve the adverse effects, and would be executed prior to the BLM's issuance of the ROD. Specific measures to resolve adverse effects would be developed in a Historic Properties Treatment Plan (HPTP) and included as an attachment to the MOA. Execution of the MOA would conclude the §106 process. If Alternatives 2 or 3 are approved, there would be no adverse effects, and an MOA would not be developed.

NEPA

NEPA establishes national policy for the protection and enhancement of the environment. Part of the function of the Federal government in protecting the environment is to “preserve important historic, cultural, and natural aspects of our national heritage.” Cultural resources need not be determined eligible for the NRHP as stated in the NHPA to receive consideration under NEPA. NEPA is implemented by CEQ, 40 CFR §§1500-1508. NEPA provides for public participation in the consideration of cultural resources issues, among others, during agency decision-making.

Assessing Effects to Historic Properties

BLM is using the definition of adverse effect in the §106 regulations to assess impacts of the proposed or alternative action for those cultural resources that BLM has identified as historic properties eligible for or listed in the NRHP. The §106 regulations describe an adverse effect as an effect “found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the [NRHP] in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association” (36 CFR §800.5(a)(1)). This consideration should apply to all the qualifying characteristics of an historic property. Adverse effects also may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative. Examples of adverse effects include, but are not limited to:

- a. Physical destruction, damage, or alteration of all or part of the property;
- b. Isolation of the property from or alteration of the character of the property's setting when that character contributes to the property's qualification for the NRHP;

- c. Introduction of visual, audible, or atmospheric elements that are out of character with the property or that alter its setting;
- d. Neglect of the property, resulting in its deterioration or destruction;
- e. Transfer, lease, or sale of the property.

4.5.1.3 CEQA Significance Criteria

Under CEQA, a project is considered to have a significant impact on the environment if it causes a substantial adverse change in the significance of a historical resource. *Substantial adverse change in the significance of a historical resource* means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the resource would be materially impaired or diminished. Furthermore, under CEQA, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Whenever a historical resource (Public Resources Code [PRC] 21084.1 and state CEQA Guidelines 15064.5(a)) or unique archaeological resource (PRC 21083.2) cannot be avoided by project activities, impacts must be addressed and mitigated if feasible, as outlined in state CEQA Guidelines 15126.4 and 15331.

CEQA criteria indicate that a project could have potentially significant impacts to cultural resources if it would:

CUL-1) Cause a substantial adverse change in the significance of a historical resource as defined in Code of Regulations Section 15064.5.

CUL-2) Cause a substantial adverse change in the significance of an archaeological resource as defined in California Code of Regulations Section 15064.5.

CUL-3) Disturb any human remains, including those interred outside of formal cemeteries.

Under AB 52, CEQA criteria indicate that a project could have potentially significant impacts to Tribal Cultural Resources (TCRs) if it would:

TCR-1) Cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)

TCR-2) Cause a substantial adverse change a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 for the purpose of this paragraph, the lead agency shall consider the significance to a California Native tribe.

As of July 1, 2015, Assembly Bill 52 (AB 52) established new requirements under CEQA to protect tribal cultural resources. AB 52 requires that CEQA analyses consider tribal cultural values, as well as scientific and archaeological values, when determining impacts and mitigation. AB 52 specifies that it is applicable to projects that have a NOP or a notice of negative declaration

filed or mitigated negative declaration on or after July 1, 2015. Because the date of the NOP for the DQSP was March 12, 2015, AB 52 consultation is not applicable to the Project.

4.5.2 Applicant-Proposed Measures

The Applicant has not proposed any APMs related to cultural resources.

4.5.3 Direct and Indirect Impacts

4.5.3.1 Alternative 1: Proposed Action

Construction

Based on the anticipated disturbance below ground and the anticipated above-ground intrusion into the flat landscape, Project activities that have the potential to affect cultural resources include:

1. In areas where cutting and filling is required, this activity would disturb surficial soils.
2. In the solar array fields, foundations for fixed tilt structures would cause ground disturbance down to a maximum depth of 7 feet below grade, and posts for single-axis tracking structures would cause ground disturbance down to a maximum depth of 12 feet below grade. The maximum height of the solar panels would occur under the fixed tilt system, in which the arrays would intrude into the flat landscape to a maximum height of 13 feet above grade.
3. Underground direct current (DC) cables leading to a Power Conversion Station (PCS) would be situated within each array. Trenches excavated for cables would reach a depth of 3 feet.

Ground-disturbing construction activities associated with the Project could directly affect cultural resources by damaging and displacing artifacts. Construction activities could diminish site integrity of historic properties and alter the characteristics that make the properties eligible for the NRHP and/or CRHR. These historic properties, and any additional archaeological sites that are inadvertently discovered during construction, would be located within the full extent of the Project's below-grade impacts (inclusive of foundations and trenches) and above-grade impacts (inclusive of above-ground facilities). In addition, indirect effects to archaeological resources, historic architectural resources, and places of traditional cultural importance could occur. For example, increased site access could result in vandalism or unintentional harm to cultural resources. In addition, flash floods, whose effects would likely be magnified due to soil erosion caused by the proposed Project, could cause disturbance of surface or subsurface cultural resources located on lower gradients than the APE.

As a result of the literature and records searches, archival research, Native American consultation, and field investigations described in Section 3.5, a total of 291 archaeological sites (95 prehistoric, 186 historic-period, 10 multi-component) and 621 isolates (158 prehistoric and 463 historic-period; 620 identified during the SRI survey and one identified by BLM), have been identified within the APE for the Project. Based on Appendix B in the Addendum to the SRI report, two of the sites which make up the Mule Tank Discontiguous Rock Art District are listed on the NRHP. Eighteen additional sites are eligible for the NRHP and CRHR, and may be impacted by the Project through direct or indirect impacts. All of these listed and eligible sites are located on land managed

by the BLM. The majority of the eligible sites are near the Colorado River Substation (CRSS). Fifteen of these sites are prehistoric, and two are multicomponent.

Of the 291 sites and 621 isolates, the proposed construction, operation, maintenance, and decommissioning of the Project would permanently affect 197 archaeological sites and all 621 of the isolates by damaging and displacing artifacts and features. Of these, 10 sites (listed in Table 4.5-1) have been determined eligible for the NRHP or CRHR.

The Mule Tank Discontiguous Rock Art District, P-33-000504 and P-33-000773, is located outside of the Project area one mile to the southwest. The Project area may fall within the viewshed of the Mule Tank District due to the district’s elevation above the Project area. However, the Project will not have an adverse effect to the Mule Tank District.

Table 4.5-1. NRHP and CRHR Eligible Sites Adversely Affected Within the Direct APE, Alternative 1

Site Name	Site Type	Eligible under NRHP/CRHR Criteria	Proposed Effects Determinations
P-33-001821/CA-RIV-1821	Prehistoric thermal rock features with associated artifacts	Eligible, Criterion D/4, A/1, and B/2	Adverse Effect
P-33-024283/CA-RIV-11937	Prehistoric thermal rock features with associated artifacts	Eligible, Criterion D/4	Adverse Effect
P-33-024356/CA-RIV-11990	Prehistoric thermal rock features with lithic scatter	Eligible, Criterion D/4	Adverse Effect
P-33-024361/CA-RIV-11995	Prehistoric thermal rock features with associated artifacts	Eligible, Criterion D/4	Adverse Effect
P-33-024385/CA-RIV-12019	Prehistoric thermal rock features	Eligible, Criterion D/4	Adverse Effect
P-33-024459/CA-RIV-12091	Prehistoric thermal rock features	Eligible, Criterion D/4	Adverse Effect
P-33-024394/CA-RIV-12028	Prehistoric trail	Eligible, Criterion D/4, A/1, and B/2	Adverse Effect
P-33-024496/CA-RIV-12128	Prehistoric thermal rock features with lithic scatter	Eligible, Criterion D/4	Adverse Effect
P-33-024497/CA-RIV-12129	Prehistoric thermal rock features with associated artifacts	Eligible, Criterion D/4	Adverse Effect
P-33-024719/CA-RIV-12240	Prehistoric thermal rock features with lithic scatter	Eligible, Criterion D/4	Adverse Effect

The Project may affect buried archaeological resources. A geoarchaeological study conducted for the Project indicated that the Orita and Rositas soil series within the Project area have a high potential for surface and buried archaeological deposits. These soil types are found in the central and northern portion of the Project. Aco and Carrizo soil series have a moderate potential for shallow subsurface deposits, and a low potential for deep subsurface deposits. The Chuckawalla soil series has a low potential for any subsurface cultural resources. Further exploration, including

test units or geoarchaeological trenching, of the sensitive Orita and Rositas soil series will be conducted, and the results of this investigation will inform the development of the MDP. Discovery of subsurface cultural resources will be documented in accordance with the monitoring and discovery plan identified in mitigation measure CULTURAL-1.

As discussed in Section 4.17.3.1, fencing of the Project area would eliminate public access to six open routes, including three routes that provide access to the Mule Mountain ACEC. However, as discussed in Section 4.14 and shown in Figure 3.14-3, there are alternative routes to the east of the Project area. With the closure of the three routes that access the Mule Mountains, alternative access to the Mule Mountains would occur by traveling west on 22nd Avenue to Gravel Pit Road, southwest along Gravel Pit Road, and then west on an unpaved extension of 24th Avenue to BLM Routes 660863 and 661093. No additional routes would be developed.

NHPA §106 government-to-government consultation with interested Native American tribes is ongoing. Should the Proposed Action be approved, mitigation measures CULTURAL-1 and CULTURAL-2 would serve to mitigate adverse effects to historic properties as a result of the Project. Provisions to resolve the adverse effects to historic properties would be described in an MOA and a HPTP prepared in accordance with §106.

Operation and Maintenance

The primary potential for direct impacts to cultural resources during operation and maintenance of the Project is from unanticipated damage of known or post-review discovery of archaeological sites. During operation and maintenance, the Applicant's worker training program, use of environmental monitoring, and clear demarcation of designated access roads would reduce the risk of unanticipated impacts to cultural resources within the Project APE. Avoidance and protection of resources during the operation and maintenance phase of the Project required by Mitigation Measure CULTURAL-1 would protect cultural resources originally avoided by construction impacts. Because operation and maintenance activities would be limited to the approved construction footprint of the Project, no additional direct or indirect impacts to cultural resources would be expected during operation and maintenance.

NHPA §106 and government-to-government consultation with interested Native American tribes is ongoing.

Decommissioning

The primary potential for direct impacts to cultural resources during the decommissioning phase of the Project is from unanticipated damage of known or post-review discovery of archaeological sites. The Applicant's worker training program, use of environmental monitoring, and clear demarcation of designated access roads would reduce the risk of unanticipated impacts to cultural resources within the ROW, but outside the smaller construction footprint of the Project site. Avoidance and protection of resources (Mitigation Measure CULTURAL-1) during the decommissioning phase of the Project would protect cultural resources originally avoided by construction impacts. Because decommissioning activities would be limited to the approved construction footprint of the Project, no additional direct impacts to cultural resources would be expected.

Project decommissioning would eliminate or substantially reduce indirect impacts to cultural resources by the removal of modern elements inconsistent with the historic setting of the area.

4.5.3.2 Alternative 2: Resource Avoidance Alternative

Of the 291 sites and 621 isolates, the proposed construction, operation, maintenance, and decommissioning of Alternative 2 would permanently affect 158 archaeological sites and all 621 of the isolates by damaging and displacing artifacts and features. Of these, no sites have been determined eligible for the NRHP or CRHR.

Alternative 2 would affect a total of 39 fewer archaeological sites/isolates when compared to the Proposed Action, including 10 fewer NRHP- and CRHR-eligible archaeological resources. As discussed in Sections 2.5 and 2.8, Alternative 2 was developed to specifically reduce impacts to cultural and biological resources. Under Alternative 2, there would be no adverse effects to historic properties. Mitigation Measure CULTURAL-2 would serve to resolve adverse effects to historic properties as a result of Alternative 2.

Nineteen NRHP- and CRHR-eligible and listed sites are located outside of the Alternative 2 Project area and could be subject to indirect impacts. They may require further treatment as described in Mitigation Measure CULTURAL-2. The Mule Tank Discontiguous Rock Art District, P-33-000504 and P-33-000773, is located outside of the area of Alternative 2 one mile to the southwest. Alternative 2 may fall within the viewshed of the Mule Tank District due to the district's elevation, but will not have an adverse effect to the Mule Tank District.

4.5.3.3 Alternative 3: Reduced Project Alternative

Of the 291 sites and 621 isolates, the proposed construction, operation, maintenance, and decommissioning of Alternative 3 would permanently affect 131 archaeological sites and all 621 of the isolates by damaging and displacing artifacts and features. Of these, no sites have been determined eligible for the NRHP or CRHR.

Alternative 3 would affect a total of 66 fewer archaeological sites/isolates when compared to the Proposed Action, including 10 fewer NRHP- and CRHR-eligible archaeological resources. As discussed in Sections 2.5 and 2.8, Alternative 3 was developed to specifically reduce impacts to cultural and biological resources. Under Alternative 2, there would be no adverse effects to historic properties. Mitigation Measure CULTURAL-2 would serve to resolve adverse effects to historic properties as a result of Alternative 3.

Nineteen NRHP- and CRHR-eligible and listed sites are located outside of the Alternative 3 Project area and could be subject to indirect impacts. They may require further treatment as described in Mitigation Measure CULTURAL-2. The Mule Tank Discontiguous Rock Art District, P-33-000504 and P-33-000773, is located outside of the area of Alternative 3 one mile to the southwest. Alternative 3 may fall within the viewshed of the Mule Tank District due to the district's elevation, but will not have an adverse effect to the Mule Tank District.

4.5.4 Application of CEQA Significance Thresholds

CUL-1) Would the Project cause a substantial adverse change in the significance of a historical resource as defined in Code of Regulations Section 15064.5?

Under Alternatives 1, 2, or 3, no CRHR-eligible historic resources would be located within the direct APE. Therefore, impacts would be less than significant. Because of the existence of cultural resources in the APE, the potential for inadvertent discovery of historic resources is considerable and a potentially significant impact of the Project. The disturbance could not feasibly be avoided because the likelihood of undiscovered resources exists throughout the Project area; reconfiguring the Project area would not reduce the impact.

Mitigation Measures CULTURAL-1, CULTURAL-2, CULTURAL-6, CULTURAL-7, and CULTURAL-8 would address these potential impacts to historic properties. If the Proposed Action is selected, CULTURAL-1 would require the development of an MOA, to include the County and Native American tribes. The MOA would include measures to avoid, minimize, and mitigate adverse effects to both NRHP and CRHR-eligible historic properties. CULTURAL-2 would require a HPTP for both NRHP- or CRHR-eligible or listed historic properties that cannot be protected from indirect effects by Project redesign. CULTURAL-6 would require that the Applicant make a good faith effort to enter into a contract with and retain monitors designated by Tribal representatives. CULTURAL-7 requires a Cultural Resources Monitoring Report that meets BLM Manual requirements and also complies with the current Riverside County Planning Department's requirements for Phase IV Cultural Resource Monitoring Reports. CULTURAL-8 requires that cultural resource issues be included within the WEAP training specified in measure VEG-6. These measures would reduce the impacts to historical resources (including those eligible for the CRHR), if any are identified, by putting procedures in place for their management and treatment. Important resources that are not now known may be identified through ongoing tribal consultation or during construction. If the loss of these resources cannot be fully mitigated, the impacts would be significant and unmitigable under Alternatives 1, 2, or 3.

CUL-2) Would the Project cause a substantial adverse change in the significance of an archaeological resource as defined in California Code of Regulations Section 15064.5?

Under Alternative 1, 10 prehistoric sites eligible for the CRHR fall within the APE and may be directly or indirectly affected by the Project, potentially creating significant impacts. However, significant impacts are not anticipated because no unique archaeological resources have been identified to date.

Within the Alternative 2 footprints for the solar facility site and gen-tie line, no prehistoric sites eligible for the CRHR fall within the APE and no unique archaeological resources have been identified, therefore no significant impacts would occur.

Within the Alternative 3 footprints for the solar facility site and gen-tie line, no prehistoric sites eligible for the CRHR fall within the APE and no unique archaeological resources have been identified, therefore no significant impacts would occur.

The possibility exists that archaeological resources could be unearthed during construction of Alternative 1, Alternative 2, or Alternative 3. The potential for inadvertent discovery of archaeological resources is considerable and a potentially significant impact of Alternative 1,

Alternative 2, or Alternative 3. Alternative 1, Alternative 2, or Alternative 3 would incorporate a monitoring program to discover and evaluate previously undiscovered resources found during construction (Mitigation Measure CULTURAL-4), and implementation of Mitigation Measures CULTURAL-1 through 8 would reduce some of these impacts to less than significant levels. However, because the severity of the residual impact would depend on the value of each resource found and the extent of its destruction during construction, the impact may remain significant even with all mitigation implemented. Because Alternative 3 or Alternative 3 would disturb a smaller area than Alternative 1, the potential for significant impacts would be reduced.

Significant direct physical impacts to unique archaeological resources often result in the complete destruction of the resource. Mitigation of some of these impacts involves the collection of information or “data recovery.” This analysis and interpretation of the data collected through archaeology teaches us about the lives of historic people. The knowledge gained about American history enriches the lives of the general public. Therefore, although an important resource is lost forever, some of the information about that resource is retained. While mitigation measures can reduce many individual site impacts to less than significant levels, archaeological excavation and analysis cannot recover all the scientific values of a site. As a result, the impact overall may remain significant under Alternatives 1, 2, or 3.

CUL-3) Would the Project disturb any human remains, including those interred outside of formal cemeteries?

No human remains have been previously recorded or discovered during surveys of the Project site, as such, no impacts to this type of resource are anticipated; the possibility is substantial enough that the impact is considered potentially significant. Should human remains be discovered at any time during implementation of Alternatives 1, 2, or 3, construction in the vicinity would halt and the Coroner would be contacted immediately (Mitigation Measure CULTURAL-3). If the Coroner determines that the remains do not require an assessment of cause of death and are probably Native American, then the NAHC would be contacted to identify the most likely descendants in accordance with CULTURAL-3. Implementation of this measure would reduce impacts to a less than significant level under Alternatives 1, 2, or 3.

TCR-1) Would the Project cause a substantial adverse change in the significance of a Tribal Cultural Resource that is listed or eligible for listing in the California Register of Historical Resources?

In a letter dated November 18, 2016, the Tribal Historic Preservation Office (THPO) of the Twenty-Nine Palms Band of Mission Indians described the Project as being located within the boundary of its Traditional Use Area. As discussed in Table 4.5-1, Alternative 1 would adversely impact 10 archaeological sites that are eligible for the NRHP and CRHR. As discussed in Section 3.5.2, Addendum 2 to the Class III Archaeological Survey Report recommended that site P-33-001821 may qualify as a TCR under CEQA. BLM has requested additional information from the Tribes that identify a link between the link between the significant features and significant events, patterns, or trends in prehistory, or to better understand the role of the Mule Mountains in historically rooted beliefs, customs, and practices of the Tribes. If this site is determined to be a TCR, impacts would be significant. If the Proposed Action is selected, an MOA requiring consultation with the ACHP, SHPO, the Applicant, Riverside County, Native American Tribes, and other identified consulting parties would be implemented under Mitigation Measure

CULTURAL-1. Through this consultation, measures to avoid, minimize, or mitigate these adverse effects would be identified and implemented. In addition, Mitigation Measure CULTURAL-6 would require that Tribes be given an opportunity to designate Native American Tribal Monitor(s) to monitor the project. Since adverse effects would be avoided, minimized, or mitigated, impacts would be reduced to less than significant.

Under Alternatives 2 and 3, none of the sites that are eligible for the NRHP or CRHR would be impacted, including site P-33-001821. Therefore, no impacts would occur to TCRs under Alternatives 2 and 3.

TCR-2) Would the Project cause a substantial adverse change in a resource identified through consultation with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project?

In a letter dated November 18, 2016, the THPO of the Twenty-Nine Palms Band of Mission Indians Tribe requested ongoing consultation associated with the archaeological sites determined to be eligible and possibly eligible for the NRHP and CRHR, as well as a culturally sensitive site crossed by the Project, and a culturally sensitive area in the vicinity of the Project. In a letter dated May 16, 2018, the Tribe described the culturally sensitive site and the culturally sensitive area as TCRs that have a cultural value to the Tribe.

As described for TCR-1, Alternative 1 would adversely impact 10 archaeological sites that are eligible for the NRHP and CRHR, and for which the Tribe has requested ongoing consultation. If the Proposed Action is selected, an MOA requiring consultation with the ACHP, SHPO, the Applicant, Riverside County, Native American Tribes, and other identified consulting parties would be implemented under Mitigation Measure CULTURAL-1. Through this consultation, measures to avoid, minimize, or mitigate these adverse effects would be identified and implemented. In addition, Mitigation Measure CULTURAL-6 would require that Tribes be given an opportunity to designate Native American Tribal Monitor(s) to monitor the project. Since adverse effects would be avoided, minimized, or mitigated, impacts would be reduced to less than significant. Impacts to these sites would be avoided under Alternatives 2 and 3.

In a letter dated May 16, 2018, the Tribe described the culturally sensitive site and the culturally sensitive area as TCRs that have a cultural value to the Tribe. As discussed in Section 4.5.3.1, the Mule Tank Discontiguous Rock Art District, P-33-000504 and P-33-000773, is located outside of the Project area one mile to the southwest. The Project area may fall within the viewshed of the Mule Tank District due to the district's elevation above the Project area. However, neither Alternatives 1, 2, or 3 would have an adverse effect to the Mule Tank District. There would be no impacts.

4.5.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.5 would be maintained. No ground disturbance would occur, and no historic properties would be affected. Therefore Alternative 4 would not result in any impacts associated with cultural resources.

4.5.6 Cumulative Impacts

The regulations implementing §106 of the NHPA contemplate close coordination between the NEPA and NHPA processes (40 CFR §1502.25(a); 36 CFR §800.8(a)) and both require an examination of cumulative impacts. 36 CFR §800.5(a)(1) defines an undertaking's "adverse effect" to include "reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative".

For purposes of this cumulative analysis, impacts on cultural resources could occur at any time throughout the life of the Project. The past, present, and reasonably foreseeable projects considered to be the cumulative scenario for this Project are shown in Tables 4.1-1 and 4.1-2. These are primarily large-scale renewable energy projects that require extensive grading and ground disturbance. The cumulative projects also include several transmission lines and non-renewable energy projects, as well as residential and commercial developments along the I-10 corridor. Ground disturbance and construction associated with these types of projects would be on a smaller scale than the renewable energy projects, given the smaller acreage generally involved with these projects.

The area for analysis of cumulative impacts is often more extensive and far-reaching than just the APE. Impacts to cultural resources can include archaeological sites, traditional use areas, and cultural landscapes located along the I-10. Numerous significant archaeological and historical resources have been previously discovered within the Project's broader geographical area, although many are not thoroughly documented. Therefore, the Project and the alternatives have the potential to inadvertently discover, unearth, expose, disturb, or cause damage archaeological, historic, and Native American resources.

Information has been gathered by previous studies regarding various projects' impacts on previously known or unknown cultural resources within the region. The cumulative impacts of seven past projects (the Blythe Energy II Project, Genesis Solar Energy Project, Desert Sunlight Solar, Eagle Mountain Pumped Storage Project, MSEP, Quartzsite Solar Energy Project in Arizona, and Desert Harvest Project) are summarized below (summarized from BLM 2014). The Blythe Energy II Project altered ten historic resources (CEC and WAPA 2005). Twenty prehistoric sites, 5 historic archeological sites, and one multi-component site were identified for the Genesis Solar Energy Project that were within the APE would be impacted by the project (AECOM 2016). The Desert Sunlight Solar Project estimated that 49 historic sites, six prehistoric sites, one multicomponent site, and one site of an unknown date would be damaged, as well as an indirect effect on one built environment resource, two archaeological districts, and one prehistoric site (BLM 2011). One built environment resource and seven historic sites were altered by the Eagle Mountain Pumped Storage Project (SWRCB 2010). The Final EIS for the MSEP listed 101 archaeological sites that would be impacted by the project (BLM 2012b). The Quartzsite Solar Energy Project, located in Arizona, concluded that it would alter three historic sites and one prehistoric site as well. Seven important tribal resources were also identified that the project would both directly and indirectly affect (WAPA 2011). Lastly, the Desert Harvest project stated that one prehistoric site would be impacted, while one historic landscape would have indirect effects from

the project (BLM 2012f). The BSPP reported 81 archaeological sites, of which 41 contained historic artifacts or features in addition to historic materials, and which would be impacted by that project (AECOM 2017). The Palen Solar Power Project (Tennyson and Apple 2010) listed 39 archaeological sites that could be impacted by the project. It is worth noting that while these projects have all been approved for development, several have not been constructed years after their approval, including the Rice Solar Energy Project and Desert Harvest.

The majority of cultural resources currently identified in the course of past and present projects within the region are archaeological sites, most of which date from the historic period (BLM 2014). Prehistoric sites within the Project area consist of hearth features, trails, campsites, habitation sites, lithic scatters, and ceramic scatters. Historic archaeological sites within the Project vicinity include roads, wells, agricultural fields, refuse scatters, camps, and features associated with mining, transportation, agriculture, and military training. Many of these historic sites are related to the DTC-C/AMA. Answers to regional research questions can be learned from studying these prehistoric and historic sites. Damage to archaeological sites cannot be reversed and information may be lost. Cumulative effects may alter the setting, feeling, and association of archaeological resources within the wider geographic area.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

The proposed construction, operation, maintenance, and decommissioning of the Project would permanently affect 197 archaeological sites and 621 isolates by damaging and displacing artifacts and features. The Project would directly affect 10 archaeological resources that have been determined eligible for the NRHP and CRHR. None of these 10 resources are associated with the DTC-C/AMA, a NRHP-eligible historic district. An MOA would be developed pursuant to §106 of the NHPA for the Project and would include provisions to resolve the adverse effects to these archaeological sites.

Most of the cumulative projects are on BLM or other Federal land and, for this reason, are or would be subject to NEPA and the NHPA, which contain cultural resource protective requirements related to investigations, impact assessment, avoidance, and mitigation. The cumulative projects that would not be located on Federal land would require discretionary state or local agency approvals, and so would be subject to CEQA; therefore, any related impacts on cultural resources would be subject to cultural resource-protective requirements based on state law to avoid or minimize these impacts. Cumulative impacts would vary by alternative only to the degree to which direct and indirect impacts would vary by alternative.

The Project would not cause a substantial adverse change in the significance of a historical or archaeological resource (impact CUL-1 and CUL-2). With implementation of Mitigation Measures CULTURAL-1 through 8, the Project's contribution to impacts would not be cumulatively considerable.

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

This alternative would result in a reduction of the number of sites impacted, as well as reduce the acreage and footprint of the overall Project. This will provide for fewer cumulative impacts over

time. Alternative 2 would affect a total of 39 fewer archaeological sites/isolates when compared to the Proposed Action (Alternative 1). Due to the smaller Project area and planned avoidance of NRHP- and CRHR-eligible resources, the cumulative impacts for Alternative 2 are also reduced.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

This alternative would result in further reductions of the number of sites impacted, as well as reduce the acreage and footprint of the overall Project. This will provide for fewer cumulative impacts over time. Alternative 3 would affect a total of 66 fewer archaeological sites/isolates when compared to the Proposed Action (Alternative 1). It would also affect a total of 27 fewer archaeological sites/isolates when compared to Alternative 2. Due to the smaller Project area and planned avoidance of NRHP- and CRHR-eligible resources, the cumulative impacts for Alternative 3 are also reduced.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. There would be no potential to impact cultural resources, and therefore no contribution to cumulative cultural resource impacts.

4.5.7 Residual Impacts

Implementation of Mitigation Measures CULTURAL-1 and CULTURAL-2 would reduce but may not fully avoid Project-related impacts on cultural resources. Cultural resources damaged or destroyed by construction activities, even if subjected to mitigation measures, would be permanently lost from the archaeological record. These cultural resources therefore would be unavailable for future study to address future research needs when more advanced investigative techniques and methods of analysis might be available. Unavoidable adverse effects on cultural resources would result from construction, operation, maintenance, and decommissioning of all of the Project components under Alternative 1. Consultations may raise issues that cannot be resolved through the implementation of mitigation measures. Prescribed treatments may resolve adverse effects under NHPA §106. However, given the scale and potential significance of the resources identified, impacts may remain significant under NEPA despite implementation of the MOA. Because all impacts under CEQA would be less than significant, residual impacts would also be less than significant.

4.6 Environmental Justice

4.6.1 Methodology for Analysis

To carry out the policy set forth in NEPA, the Federal government has a "... continuing responsibility ... to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may ... achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities" (42 USC §4331(b)(5)).

This analysis of potential effects of the Proposed Action and alternatives on environmental justice issues reflects this mandate as well as that contained in Executive Order No. 12898, which requires a Proposed Action's impacts on environmental justice to be considered as part of the NEPA process if the Proposed Action would "result in impacts that are appreciably more severe in magnitude or are predominately borne by any segment of the population, for example, household population with low income or a minority population in comparison with a population that is not low income or minority." The Presidential memorandum accompanying the executive order states that "each Federal agency shall analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities, when such analysis is required by NEPA."

To consider environmental justice issues in the context of the Project, this analysis uses a demographic screening evaluation to determine whether a minority and/or low-income population exists within a six mile radius beyond the site boundary, which is considered the furthest extent of potential impacts to human health and safety. Broader social and economic impacts are considered for the populated areas of the City of Blythe, the Colorado River Indian Reservation, and the unincorporated community of Mesa Verde. These areas are included in U.S. Census tracts 459, 461.01, 461.02, 461.03, 462, 469, 9810, Blythe City, Blythe CCD, Chuckwalla CCD, and the Colorado River Indian Reservation. These areas contain many of the communities with the potential to be most affected by socioeconomic impacts.

The demographic screening to determine the presence of minority and low-income populations is based on information contained in two documents: *Environmental Justice: Guidance Under the National Environmental Policy Act* (CEQ 1997) and *Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analyses* (USEPA 1998). The screening process relies on 2009-2013 American Community Survey data to determine the presence of minority and below- poverty-level populations. In addition to the demographic screening analysis, this document follows the steps recommended by the USEPA's guidance documents, which recommend outreach and involvement, and, if warranted, a detailed examination of the distribution of impacts on segments of the population.

The USEPA guidance (USEPA 1998) provides a numerical threshold, 50 percent of the total population, to identify an affected community of minority population for analysis of environmental justice. The guidance also states that the percentage of minority population in the affected area should be "meaningfully greater" than that in the general population to which the affected population is compared.

Although the guidance does not provide a numerical threshold for "meaningfully greater," for this analysis, the percentage of minority population is considered to be meaningfully greater than that

of the general population if the percentage of minority population in the affected area is simply greater than that of the general population, providing for a conservative analysis. For this analysis, because minority populations are nearly all over 50 percent, including for Riverside County, all geographies can be considered areas of environmental justice concern.

The USEPA guidance does not provide a numerical threshold for identifying a low-income population. It recommends use of Census data on poverty income as one indicator and other local data as may be available. This analysis uses the percentage of affected population who either as individuals or as members of families having incomes below the Census-defined poverty threshold.

The percentage is compared to that of the general population, and the affected area is included in the analysis if the percentage of low-income population is meaningfully greater than that of the general population, based on the same thresholds as in the case of a minority population.

In addition, the USEPA guidance states that the analysis of environmental justice should determine if the affected area of minority population and/or low-income population is subject to “disproportionately high and adverse human health or environmental effects” from the Project. The guidance suggests that a comparative analysis be performed on potential Project impacts to the affected population and a reference population to determine the type of high and adverse effects and the extent of disproportionality (USEPA 1998).

The primary affected area was considered to be six miles around the boundary of the Project site and the transmission corridor, including agricultural lands on northwestern Palo Verde Mesa, portions of the City of Blythe and its sphere of influence, Blythe Airport, and unincorporated community of Mesa Verde, located south of Blythe Airport and I-10. In addition, the analysis included a secondary area, which encompassed the populated areas of the City of Blythe and the Colorado River Indian Reservation. These areas are included in U.S. Census tracts 459, 461.01, 461.02, 461.03, 462, 469, 9810, Blythe City, Blythe CCD, Chuckwalla CCD, and the Colorado River Indian Reservation. As discussed in Section 3.6.1.1, the Chuckwalla Valley CCD, in which the Project is located, has a minority population of 76.7 percent of the population. This percentage is higher than Riverside County as a whole (61.7 percent) and the Blythe CCD (68.5 percent), but is similar to the percentage for the City of Blythe (71.9 percent). Only one of the areas, CT470, had a minority population lower than 50 percent of the total population. All of the areas, with the exception of CT470, are therefore of potential concern for environmental justice analysis.

With respect to income, the percentages of household population living with income below the poverty threshold for those areas within a six mile radius of the Project site, and within the secondary areas of La Paz County and Colorado River Indian Reservation, is shown in Table 3.6-1. The percentage of Riverside County population with income below the poverty level is 16.9 percent. Accordingly, the percentage of population below the poverty level in an affected area is considered to be meaningfully greater than the general population if it exceeds 16.9 percent, providing for a conservative analysis. The Chuckwalla Valley CCD, in which the Project is located, has 19.2 percent of the population with income below the poverty level. This percentage is higher than Riverside County as a whole (16.9 percent). All areas included in the analysis had a greater percentage of the population with income below the poverty level than Riverside County as a whole, and are therefore of potential concern for environmental justice analysis..

The findings and analysis contained in the following sections of this Final PA/EIS/EIR have been reviewed as part of this analysis of environmental justice issues: 4.2, *Air Resources*; 4.7, *Geology*

and Soils; 4.9, *Hazards and Hazardous Materials*; 4.12, *Noise*; 4.14, *Recreation and Public Access*; 4.15, *Social and Economic Effects*; 4.17, *Transportation and Traffic*; 4.19, *Visual Resources*; and 4.20, *Water Resources*. Other sections (such as cultural resources, mineral resources, and lands and realty) were determined to have no potential health, environmental, or social effects on the local populations and, therefore, were not reviewed further for potential environmental justice impacts. In reviewing each of these sections, this environmental justice analysis considers potential impacts and mitigation measures and whether a “disproportionately high and adverse” (CEQ 1997) impact would result for the area within six miles of the proposed Project site, or to the secondary area which includes the Colorado River Indian Reservation.

4.6.1.1 CEQA Significance Criteria

CEQA does not require the analysis of environmental justice impacts and so does not provide specific significance criteria for environmental justice impacts. Consequently, no CEQA significance determinations have been made for the analysis of environment justice impacts below.

4.6.2 Applicant-Proposed Measures

There are no APMs to address potential effects of environmental justice.

4.6.3 Direct and Indirect Impacts

4.6.3.1 Alternative 1: Proposed Action

The closest residents are an apparent occupied mobile home trailer located approximately 3,700 feet north of the northeast corner of the Project boundary, and a residence located approximately 4,800 feet north of the northeast corner of the Project site boundary. The analysis of noise impacts, and impacts associated with geologic hazards and soils, hazards and hazardous materials, and transmission line safety and nuisance, concluded that impacts would be limited to a small area surrounding the Project site, and would not affect the communities of concern. As these impacts cannot affect any population, they are unable to accrue disproportionately to nearby environmental justice populations.

The potential for adverse impacts to human health and the environment through other resource areas to result in disproportionately high and adverse impacts on nearby residents is described below.

Construction, Operation and Maintenance, and Decommissioning

Project construction, operations, and decommissioning may result in potential impacts on the communities of concern for the following issues:

Air Quality

The analysis of air quality impacts in Section 4.2 indicates that, even with APMs and Mitigation Measures AQ-1 and AQ-2, emissions for NO_x, PM₁₀, and PM_{2.5} during Project construction would exceed the MDAQMD daily and annual thresholds. Although there are two receptors located within one mile of the Project boundary, emissions sources would be dispersed throughout the Project area and the access road, and there would be no substantial point source emissions. These

impacts are not expected to be disproportionately high and adverse for the community of concern because they would be temporary during construction, and would cease following completion of construction, and are unlikely to affect the closest sensitive receptor, which is located approximately 3,700 feet from the Project area.

Recreation

Six existing roadway routes on the Project site would be closed for the duration of the Project, reducing access for recreational activities. Three of these routes provide access to the private land parcel at the center of the Project area, which will be inaccessible to the public, so are not likely to be used for recreation. Three other routes provide access to the Mule Mountains. However, other nearby routes that provide similar access to these mountains would remain open. With the closure of the three routes that access the Mule Mountains, alternative access to the Mule Mountains would occur by traveling west on 22nd Avenue to Gravel Pit Road, southwest along Gravel Pit Road, and then west on an unpaved extension of 24th Avenue to BLM Routes 660863 and 661093. With access open to the Mule Mountains ACEC, the Project would be unlikely to adversely affect recreation access or reduce recreational opportunities. The area within the solar plant site boundary would be inaccessible for recreational use. However, these impacts would not be disproportionately high and adverse for the community of concern because alternative recreational sites are equally accessible and available to nearby residents.

Social and Economic Issues

Expenditures related to Project construction, operation, and maintenance are expected to result in beneficial economic impacts to the surrounding region. The need for temporary housing for construction workers may increase demand for vacant housing and for transient facilities (hotels, motels, and camping sites). The need for housing for permanent employees who may relocate to the Blythe area would increase the demand for housing to be purchased or rented. Such demand would result in positive impacts to owners of vacant and transient housing, but may result in negative impacts to those seeking to relocate into the surrounding areas by limiting the availability of remaining housing options. This is not considered to be a disproportionately high impact to the community of concern, because substantial temporary and long-term housing exists in the region to accommodate construction and operations personnel, and socioeconomic impacts are not considered to be adverse.

Transportation and Traffic

Construction-related traffic, both from commuting workers and transport of materials, would temporarily increase traffic levels on I-10, Mesa Drive, and the 16th Avenue/Seeley Avenue access road to the Project site. Operation and maintenance would result in a minor increase in traffic; however, no Project-related traffic increases would reduce the level of service (LOS) of I-10 in this area or cause traffic levels that would exceed the capacity of local roadways. Therefore, these impacts would not be disproportionately high or adverse for nearby environmental justice populations.

Visual Resources

The Project would result in short-term impacts from construction lighting and visible dust plumes, and adverse effects from large-scale visual disturbance in the landscape resulting from

construction activities and equipment. During operation and maintenance, the Project would likely be a source of adverse visual impact as a large-scale visual disturbance that would introduce industrial components and facilities to the landscape. Due to the Project site's distance from populated areas and its corresponding overall small part of the visual landscape from these locations, this impact is not considered to accrue disproportionately to nearby environmental justice populations, and is not considered an environmental justice impact.

Water Resources

As discussed in Section 4.20.3.1, groundwater modeling shows that the drawdown impacts from water use are negligible to offsite water wells. Therefore, the Project would not result in groundwater supply impacts from the use of groundwater for Project construction, operations, or decommissioning.

As shown in Figure 3.6-1, the Project is located in an area with minority and low income populations. Water supply for these local residents, the nearest being located approximately 3700 feet north of the proposed solar facility, is most likely from groundwater. Hazardous materials would be used as part of Project construction and operations and could, if released, contaminate groundwater. Mitigation Measure WATER-1 would require that vehicle fueling occur only in a designated area protected by secondary containment, limiting the potential for release of fuels. In addition, Mitigation Measure HAZ-1 requires the Applicant to cap onsite wells, establish baseline groundwater quality, and periodically sample groundwater and the septic system to verify that no releases have occurred. If a release were to occur, its extent would be limited because of the relatively low volumes of hazardous materials and fuels onsite at any time. A release to groundwater would also flow to the east, which is the dominant groundwater flow direction, and not towards the nearest residences to the north. Although releases to groundwater could occur, it is unlikely that these would accrue to any nearby environmental justice population.

4.6.3.2 Alternative 2: Resource Avoidance Alternative

With respect to the resource areas of air quality, recreation, social and economic issues, transportation and traffic, visual resources, and water resources, the analysis in their respective subsections in Chapter 4 concluded that impacts associated with Alternative 2 were similar to, or slightly lower than, the impacts associated with the Proposed Action. Because the Proposed Action was not expected to cause disproportionately high or adverse impacts on minority and/or low-income populations through impacts to these resource areas, there would be no high or adverse impacts on minority and/or low-income populations associated with Alternative 2.

4.6.3.3 Alternative 3: Reduced Project Alternative

With respect to the resource areas of air quality, recreation, social and economic issues, transportation and traffic, visual resources, and water resources, the analysis in their respective subsections in Chapter 4 concluded that impacts associated with Alternative 3 were similar to, or slightly lower than, the impacts associated with both the Proposed Action and Alternative 2. Because the Proposed Action and Alternative 2 were not expected to cause disproportionately high or adverse impacts on minority and/or low-income populations through impacts to these resource areas, there would similarly be no high or adverse impacts on minority and/or low-income populations associated with Alternative 3.

4.6.4 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.6 would be maintained. With respect to the resource areas of air quality, recreation, social and economic issues, transportation and traffic, visual resources, and water resources, there would be no adverse impacts which would cause disproportionately high or adverse impacts on minority and/or low-income populations.

4.6.5 Cumulative Impacts

The Project would have no impact related to environmental justice; therefore, it would not cause or contribute to any cumulative impact in this regard.

4.6.6 Residual Impacts

In Sections 4.6.3.1, 4.6.3.2, and 4.6.3.3, no resource impacts which could potentially result in disproportionately high or adverse impacts on minority and/or low-income populations were identified for any of the action alternatives. Therefore, there would be no residual impacts.

4.7 Geology and Soils

4.7.1 Methodology for Analysis

The analysis of the Proposed Action and alternatives is based on a qualitative assessment of their effects on soil resources, their susceptibility to geologic and seismic hazards, and their potential to cause or exacerbate geologic and seismic hazards. The analysis is based upon existing publications and maps completed by state and Federal agencies, such as the U.S. Geological Survey (USGS), California Geological Survey (CGS), U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), and the California Division of Mines and Geology (CDMG). In addition, the severity and significance of geology and soils impacts are analyzed in the context of existing regulations and policies aimed at abating potential impacts to soil resources and from geologic and seismic hazards.

The information in the existing publications and maps was reviewed and summarized by the Applicant in their Preliminary Geotechnical Investigation Report for the First Solar Development, Inc., Desert Quartzite Solar Project, Riverside County, California, prepared by URS, 2011. That report concluded that a comprehensive design-level geotechnical investigation should be performed prior to construction. In their POD, the Applicant committed to conducting geotechnical field investigations, and incorporating the results into the Project design. The field investigations would include exploratory borings to evaluate subsurface conditions. While the scope, findings, and recommendations of that field investigation are forthcoming, this analysis assumes that the geotechnical report would be consistent with the current state of practice in the field of engineering geology, and would provide the information necessary to design the Project in accordance with the 2007 California Building Code (CBC). In addition, construction would be overseen by a licensed geotechnical engineer, who would observe and test engineered fill, subgrade preparation, foundation-bearing soils, and other geotechnical conditions exposed during construction.

The following issues were considered in the analysis of impacts related to geology and soils for the Proposed Action and each alternative:

1. Accelerated and/or environmentally harmful soil erosion;
2. Damage to Project elements or increased exposure of the public to risks from rupture of a known earthquake fault;
3. Injury, death, or property damage as a result of earthquake induced ground deformations (e.g. lateral spreading, subsidence, liquefaction, or collapse), or otherwise unstable soils; and
4. Injury, death, or property damage as a result of an on-site or off-site landslide.

4.7.1.1 CEQA Significance Criteria

The criteria used to determine the significance of potential geology and soils impacts are based on Appendix G of the state CEQA Guidelines. The Project would result in a significant impact under CEQA related to geology and soils if it would:

- GEO-1) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving:

- a) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.
- b) Strong Seismic ground shaking.
- c) Seismic-related ground failure, including liquefaction.
- d) Landslides.

GEO-2) Result in substantial soil erosion or the loss of topsoil.

GEO-3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

GEO-4) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life and property.

GEO-5) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

The following additional significance criteria from the County of Riverside CEQA Environmental Assessment Form are used in the analysis. A project could have potentially significant impacts if it would:

GEO-6) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard.

GEO-7) Change topography or ground surface relief features.

GEO-8) Create cut or fill slopes greater than 2:1 or higher than 10 feet.

GEO-9) Result in grading that affects or negates subsurface sewage disposal systems.

GEO-10) Change deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake.

GEO-11) Result in any increase in water erosion either on- or off-site.

GEO-12) Be impacted by or result in an increase in wind erosion and blowsand, either on- or off-site.

GEO-13) Be an incompatible land use located adjacent to a state classified or designated area or existing surface mine.

GEO-14) Expose people or property to hazards from proposed, existing or abandoned quarries or mines.

4.7.2 Applicant-Proposed Measures

There are no APMs proposed to address potential adverse impacts due to geologic hazards, or impacts to soil resources.

4.7.3 Direct and Indirect Impacts

4.7.3.1 Alternative 1: Proposed Action

Site conditions related to soil resources and potential geologic hazards are discussed in Section 3.7. Geologic and seismic hazards could affect the Project during construction, operations, and decommissioning phases, during which built structures could be exposed to adverse or unfavorable conditions related to soils and/or geology, or to the effects of a seismic event. Following the decommissioning phase, all Project facilities would be removed, precluding impacts related to geology, soils, and/or seismicity. During the construction and decommissioning phases, soil disturbance would occur that could result in the potential to contribute to erosion impacts.

Construction, Operation and Maintenance, and Decommissioning

Surface Fault Rupture

As discussed in Section 3.7, there are no active or potentially active faults mapped within the Project site (CGS 2010). The closest active faults are more than 58 miles away. Therefore, the potential for surface fault rupture within the Project site is low.

Ground Shaking

As discussed in Section 3.7, the Project site is located over 58 miles from the closest active faults in the region. Relative to the more seismically active areas to the west and northwest, the Project site will experience lower levels of shaking less frequently (CGS 2008). The estimated site intensity is a Modified Mercalli Intensity (MMI) value of V, which corresponds to a moderate shaking severity. Such an earthquake would be strong enough to be felt by nearly everyone, and would likely break windows and overturn unstable objects. There is a 10 percent chance that the Project area could experience a peak ground acceleration (PGA) value of 0.0373g or greater over the next 50 years. A PGA of 0.0373g could result in slight damage to older structures and would not likely result in damage to newer structures built according to current design standards. Relative to many areas in California, the Project site is distant from known, active faults and experiences less frequent and lower levels of shaking.

The highest severity of ground-shaking at the site that can be reasonably anticipated would be moderate, and building and foundation designs would be consistent with the CBC, which requires that engineers design structures to withstand earthquake loads as well as other loads (such as wind). As discussed in Chapter 2, *Proposed Action and Alternatives*, the Applicant's pre-construction geotechnical field investigations would be used to evaluate and, if necessary, modify the proposed Project design for buildings and PV mountings. In order to ensure that this proper geotechnical information is developed, Mitigation Measure GEO-1 would require the Applicant's site-specific geotechnical report to determine the physical and chemical characteristics of the site's soils, ground response to earthquakes, as well as the appropriate seismic design parameters necessary to develop adequate engineering designs and construction plans for the Project. Mitigation Measure GEO-1 would ensure compliance with the 2013 CBC, and would be sufficient to minimize risks associated with ground-shaking.

Based on the site's distance from active faults and the low likelihood of strong seismic ground shaking at the site, in addition to the design and construction standards imposed by the 2013 CBC,

the impact of strong seismic ground shaking would be minor and no additional mitigation is required.

Liquefaction

As discussed in Section 3.7, the depth to groundwater of approximately 100 feet suggests that the Project site is unlikely to have saturated soils which could be susceptible to liquefaction.

Settlement

As discussed in Section 3.7, the site is underlain by alluvial fan deposits of relatively unconsolidated, medium-dense materials. These may be unstable to support structures in the vicinity of the operations and maintenance facility and the On-Site Substation, and could be susceptible to settlement. As discussed in Chapter 2, *Proposed Action and Alternatives*, the Applicant's pre-construction geotechnical field investigations would be used to evaluate the potential for settlement and, if necessary, modify the proposed Project design for buildings and PV mountings. In order to ensure that the proper geotechnical information is developed, Mitigation Measure GEO-1 would require the Applicant's site-specific geotechnical report to determine the potential for settlement, as well as the appropriate seismic design parameters necessary to develop adequate engineering designs and construction plans for the Project. Mitigation Measure GEO-1 would ensure compliance with the 2013 CBC, and would be sufficient to minimize risks associated with settlement.

Landslides

As discussed in Section 3.7, the potential for landslides, slope instability, or debris flows at the Project site is insignificant, due to the relatively flat terrain.

Subsidence

As discussed in Section 3.7, no subsidence has been reported in the Project area. There is no petroleum or natural gas withdrawal which could result in subsidence. The EIS prepared for the BSPP concluded that no regional subsidence due to the historic groundwater withdrawal has been reported in the vicinity (BLM 2010). This includes localized or regional subsidence during the 1980's and 1990's, when regional groundwater extraction was at its historic maximum of approximately 48,000 AFY in the general area (BLM 2010). Therefore, no subsidence associated with the groundwater production for the Project is expected.

Because the Project site is associated with alluvial fans, the potential for hydrocompaction of collapsible soils could exist. Hydrocompaction of site soils would not present a life or safety hazard to site workers or the public, but may cause damage to proposed facilities if hydrocompaction-related effects are not anticipated or considered in site preparation and foundation designs for the Project. Soils that experience hydrocompaction are more typically a problem for underground linear infrastructure such as pipelines and cables, or flat, rigid foundations where greater surface areas are in contact with collapsible soils, such as might be the case with building foundations and concrete equipment and tower pads. Steel posts for the solar trackers and gen-tie line monopoles that are directly driven into borings are less likely to be adversely affected by hydrocompaction. The potential adverse effects of hydrocompaction of site soils during the construction and operations phases of the Project would be adequately addressed through the compaction and

grading requirements of the 2013 CBC, and by more stringent or specific recommendations provided by the Applicant's Project-specific geotechnical report described in Mitigation Measure GEO-1. Typical building practices might include moisture conditioning of the soil to achieve maximum stability, ensuring deleterious materials are removed from soil prior to being placed or moved on-site, and/or over-excavating existing soils and placing structural foundations on a mat of artificial fill compacted to appropriate design specifications. These types of measures, which are standard in the engineering practice and required through building and construction codes, ensure that small ground movements such as long-term soil consolidation or movements due to subsidence or collapsible soils do not damage or deteriorate building foundations and/or other structural components of the Project.

Expansive Soils

As discussed in Section 3.7, the soils on the Project site are not expected to have expansive characteristics (USDA 1969). The geotechnical study to be completed by the Applicant, as described in Mitigation Measure GEO-1, would include site-specific investigation to verify this conclusion. The study would provide site-specific Project design and construction recommendations, if needed, to address any expansive soils identified during the Applicant's field geotechnical investigations. Expansive soils, if present, would be adequately addressed through standard engineering and construction practices and implementation of geotechnical recommendations, if applicable.

Corrosive Soils

As discussed in Section 3.7, all soil types mapped on the site have a low potential for corrosion of concrete, but may have a high risk for corrosion of uncoated steel (USDA 1969). Long-term corrosion can cause damage to buried structures such as foundations and subgrade utilities, and if left unaddressed, can cause serious impairments to the structure's function and ability to withstand design loads. Adequate site preparation, which includes foundation placement of a mat of engineered fill, is likely to reduce the risk of corrosion for many of the proposed structures. The effects of corrosive soils would be further mitigated, if necessary, by incorporating any corrosion protection recommendations provided in the geotechnical report, as described in Mitigation Measure GEO-1.

Erosion

Figure 3.7-3 showed the distribution of Hydrologic Soil Groups in the Project area, and the acreage of each alternative with respect to Hydrologic Soil Groups is shown in Table 4.7-1. As shown in Figure 3.7-3, most of the Project area is dominated by Hydrologic Soil Group A soils, which have a high infiltration rate and are not expected to be prone to erosion by surface water runoff. There are Group C soils present in the western and northern portions of the site, but these areas mostly lie outside of the footprint of the evaluated alternatives, including Alternative 1. Also, these Group C soils coincide with flat stormwater ponding areas on the site. Although the soils may not facilitate infiltration, the fact that these areas are flat results in a low potential for stormwater erosion.

Table 4.7-1. Comparison of Project Footprint to Hydrologic Soil Groups

Hydrologic Soil Group by Project Component	Impact within Project Area (acres)			
	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action
Solar Plant Site				
Group A – High Infiltration Rate	2,522	2,138	1,567	0
Group B – Moderate Infiltration Rate	665	467	399	0
Group C – Low Infiltration Rate	351	104	123	0
Gen-Tie Line				
Group A – High Infiltration Rate	19	11	11	0
Group B – Moderate Infiltration Rate	0	10.5	10.5	0
Group C – Low Infiltration Rate	0	7.5	7.5	0

The geotechnical study to be completed by the Applicant, as described in Mitigation Measure GEO-1, would include site-specific investigation to verify this conclusion. Project activities which uncover and expose soils, including vegetation removal, site grading, excavation, and soil stockpiling, would leave loose soil exposed to the erosive forces of rainfall, stormwater run-on, and high winds. Further, the operation of heavy machinery and vehicles over access roads, staging areas, and construction work areas is likely to compact desert soils and decrease their capacity to infiltrate stormwater, resulting in greater levels of surface runoff in response to rainfall than might otherwise occur under natural conditions. The installation of proposed facilities, including roads, fencing, and solar arrays, could result in erosion and soil loss if not properly mitigated.

As discussed in Chapter 2, the Applicant has proposed several construction methods to minimize the potential for erosion during construction. Through Mitigation Measure WATER-1, the Applicant would be required to develop and implement a construction SWPPP, which would describe BMPs to be used for stormwater management and erosion control. The Applicant would use site preparation and stormwater control techniques to protect the facility from potential flood damage, avoid modifying upstream or downstream drainage flow rates, and avoid the potential for stormwater pollution through erosion. These techniques would be designed to encourage sheet flow across the Project site. The preferred method for site preparation would be to compact existing vegetation and disk it into the soil, leaving root systems in place. Cut and fill would be used in limited areas where mounding occurs, or to partially fill depressions that are too deep for the placement of solar panels. Any necessary cut-and-fill site preparation would be timed to minimize the length of time that uncovered ground is left exposed, thereby minimizing wind and water erosion in those areas. In addition to site preparation, the Applicant would use silt fence, fiber rolls, and other erosion control methods at locations which may be subjected to erosion. Heavily used

areas, such as the construction entrance, concrete wash-out area, and trackout pad areas would be stabilized with gravel, filter fabric, and straw bales.

As part of the analysis of impacts to soil resources for the BSPP, located north of the Project site, an analysis of soil loss under existing conditions, the construction phase, and the O&M phase of the Project for each of the three soil series mapped on the Project site was conducted (BLM 2010). One of these three soil series was the Rositas-Orita-Carrizo-Aco series, which are the predominant soils present at the DQSP site, and the analysis of the BSPP is relevant in informing the change in erosion rates that may be caused by the Project during both the construction and operation and maintenance phases.

The potential for soil loss by water erosion (sheet and rill erosion) on the BSPP site also estimated using the Universal Soil Loss Equation for pre-development, during construction, and operational conditions (BLM 2010). Modeling shows soil erosion rates on the Rositas-Orita-Carrizo-Aco series type soils would increase during construction, from 0.23 tons/acre/year to 0.51 tons/acre/year, but would be the same as the undisturbed state during operations. Without protective measures, soil disturbance and compaction, which could occur wherever soil moving activities and access roads are proposed, could cause a noticeable and possibly substantial increase in water erosion rates during low frequency, high intensity rainfall events.

The potential adverse effect of water issues is comprehensively addressed in Section 4.20. While the discussion in Section 4.20 is primarily concerned with changes in hydrology and adverse water quality impacts, the potential for surface water runoff to entrain soils and sediment is a primary concern from a water quality perspective. Consequently, the analysis provided in Section 4.20 is equally applicable to the issue of erosion and soil loss, and the mitigation proposed is likewise equally effective at reducing potential impacts. Mitigation Measure WATER-1 would reduce or avoid potential impacts with respect to construction and decommissioning activities, whereas Mitigation Measure WATER-2 would reduce the Project's effect on long-term erosion rates.

Figure 3.7-4 showed the distribution of Wind Erodibility Groups in the Project area, and the acreage of each alternative with respect to the Wind Erodibility Groups is shown in Table 4.7-1. As shown in Figure 3.7-4, the areas of highest potential wind erodibility (160 to 310 tons per acre per year) correspond to the sand dune areas in the northern and western parts of the Project area. The bulk of the Project area is classified as having moderate wind erodibility potential, in the range of 86 to 134 tons per acre per year. Alternative 1 overlies portions of the area with highest wind erosion potential in the southwestern part of the Project area, but mostly avoids the northern area.

Table 4.7-2. Comparison of Project Footprint to Soil Wind Erodibility Groups

Soil Wind Erodibility Group by Project Component	Impact within Project Area (acres)			
	Alternative 1 Proposed Action	Alternative 2 Resource Avoidance Alternative	Alternative 3 Reduced Project Alternative	Alternative 4 No Action
Solar Plant Site				
38 tons per acre per year	0	0	0	0
86 tons per acre per year	1,987	1,595	1,282	0
134tons per acre per year	1,121	958	683	0
160 to 310 tons per acre per year	430	157	123	0
Gen-Tie Line				
38 tons per acre per year	0	0	0	0
86 tons per acre per year	3	19	19	0
134tons per acre per year	5	2	2	0
160 to 310 tons per acre per year	11	8	8	0

The potential for soil loss by wind erosion on the BSPP site was also estimated using the Wind Erosion Prediction System (WEPS) for pre-development (undisturbed), during construction, and operational conditions. The wind erosion values calculated for the site indicate that, during construction, wind erosion of the Rositas-Orita-Carrizo-Aco series type soils would exceed undisturbed conditions, but only by two percent (553 tons/acre/year for exposed soils during construction, versus 539 tons/acre/year in the undisturbed state). During operations, wind erosion rates would be 296 tons/acre/year, substantially lower than undisturbed conditions (BLM 2010). While the above results were specific to the BSPP site, due to similarities in the type of construction activities and the underlying soil type, wind erosion rates within the Project site would likely show similar minor adverse changes.

Wind erosion caused by the Project is an issue addressed in the air quality analysis due to the potential for wind erosion to cause increases in fugitive dust emissions (PM₁₀ and PM_{2.5}). As described in Section 4.2, potential increases in fugitive dust emissions would be addressed through development and implementation of the Dust Control Plan, as required by Mitigation Measure AQ-1. The Plan would include the use of BLM-approved dust palliatives along unpaved access roads, watering graded areas on the solar plant site and the off-site linear corridors, treatment of soil stockpiles with soil stabilizers or durable protective covers or tarps, vehicle speed limits, and use of windbreaks to minimize wind speeds. The analysis provided in Section 4.2, is equally applicable to the issue of soil loss via wind erosion, and the Dust Control Plan would be equally effective at reducing potential impacts.

4.7.3.2 Alternative 2: Resource Avoidance Alternative

The types of impacts of Alternative 2 on soil resources and geologic hazards would be the same as those identified for Alternative 1. The severity and potential for impacts to Project facilities resulting from adverse soil conditions and seismic-related ground failures would be similar to the

Project because the same types of facilities would be built on the same soil types. However, due to the reduced acreage associated with this alternative, the amount of soil disturbance would be reduced, and there would be fewer structures that would be susceptible to geologic hazards. Therefore, the potential for adverse impacts would be reduced.

While Alternative 2 would reduce impacts compared to the Proposed Action, impacts related to adverse soil and seismic conditions could still be considered adverse. Therefore, the same Mitigation Measures would be required as for the Proposed Action.

4.7.3.3 Alternative 3: Reduced Project Alternative

The types of impacts of Alternative 3 on soil resources and geologic hazards would be the same as those identified for Alternatives 1 and 2. The severity and potential for impacts to Project facilities resulting from adverse soil conditions and seismic-related ground failures would be similar to the Project because the same types of facilities would be built on the same soil types. However, because the acreage associated with this alternative would be lower than that of Alternatives 1 and 2, the amount of soil disturbance would be reduced, and there would be fewer structures that would be susceptible to geologic hazards. Therefore, the potential for adverse impacts would be lower than that for Alternatives 1 and 2.

While Alternative 3 would reduce impacts compared to the Proposed Action, impacts related to adverse soil and seismic conditions could still be considered adverse. Therefore, the same Mitigation Measures would be required as for the Proposed Action.

4.7.4 Application of CEQA Significance Thresholds

The DQSP would be in a seismically active region, and people and structures could be exposed to seismic ground shaking. In addition, impacts resulting from secondary seismic effects, including ground-shaking, settlement, and hydrocompaction, may be potentially significant. However, geotechnical design considerations for structures shall be in accordance with applicable requirements of the 2010 CBC, the County of Riverside Municipal Code, and any applicable building and seismic codes in effect at the time the grading plans are approved. Additionally, with implementation of Mitigation Measure GEO-1, impacts would be considered less than significant during construction, operation, maintenance, and decommissioning.

GEO-1) Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving:

- 1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.**
- 2. Strong Seismic ground shaking.**
- 3. Seismic-related ground failure, including liquefaction.**
- 4. Landslides.**

The potential for surface fault rupture, seismic-related ground failure (including liquefaction), and landslides on Alternatives 1, 2, or 3 are very low. However, the Project site is in a seismically active region, and people and structures could be exposed to seismic ground shaking.

Implementation of Mitigation Measure GEO-1 requires site-specific geotechnical investigations to determine site specific parameters for foundation design and engineering. With implementation of Mitigation Measure GEO-1, impacts would be reduced to less than significant levels for Alternatives 1, 2, or 3.

GEO-2) Would the Project result in substantial soil erosion or the loss of topsoil?

Implementation of Alternatives 1, 2, or 3 would result in an increase in the potential for wind erosion during construction due to earth-moving and removal of vegetative cover. Wind erosion would be managed through implementation of the Applicant's Dust Control Plan, as required by Mitigation Measure AQ-1. Wind erosion would be substantially reduced during operations of Alternatives 1, 2, or 3 due to soil compaction. Impacts associated with wind erosion would be less than significant for construction, operation, maintenance, and decommissioning.

The potential for water erosion to result in substantial soil erosion or loss of topsoil is discussed in Section 4.20. The potential for water erosion under Alternative 2 or Alternative 3 would be reduced from that of Alternative 1 because of the smaller Project area and avoidance of drainages under the Resource Avoidance Alternative. Implementation of a construction SWPPP (as required by Mitigation Measure WATER-1) and integration of stormwater management controls into the Project design (as required by Mitigation Measure WATER-2) would prevent erosion of onsite soils, as well as prevent the potential for increasing stormwater flow rates which could increase erosion in downstream areas. With these mitigation measures, impacts associated with water erosion would be less than significant for construction, operation, maintenance, and decommissioning of Alternatives 1, 2, or 3.

GEO-3) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The Project area is flat, so the potential for landslides or lateral spreading under Alternatives 1, 2, or 3 is very low. However, the site is underlain by alluvial fan deposits of relatively unconsolidated, medium-dense materials, and they may be unstable to support structures in the vicinity of the operations and maintenance facility and the On-Site Substation, and could be susceptible to settlement or subsidence. In addition, because the Project site is associated with alluvial fans, the potential for hydrocompaction of collapsible soils could exist.

As discussed in Chapter 2, *Proposed Action and Alternatives*, the Applicant's pre-construction geotechnical field investigations would be used to evaluate the potential for settlement and hydrocompaction and would, if necessary, be used to modify the design for buildings and PV mountings. In order to ensure that this proper geotechnical information is developed, Mitigation Measure GEO-1 would require the Applicant's site-specific geotechnical report to determine the potential for settlement and hydrocompaction, as well as the appropriate seismic design parameters necessary to develop adequate engineering designs and construction plans for Alternatives 1, 2, or 3. Mitigation Measure GEO-1 would ensure compliance with the 2013 CBC, and would be sufficient to minimize risks associated with settlement. This potentially significant impact would be reduced to a level considered less than significant with implementation of Mitigation Measure GEO-1 under Alternatives 1, 2, or 3.

GEO-4) Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life and property?

The soils on the Alternatives 1, 2, or 3 site are not expected to have expansive characteristics (USDA 1969). The additional geotechnical investigation required in Mitigation Measure GEO-1 would provide site-specific Project design and construction recommendations if needed to address any expansive soils. Expansive soils, if present, would be adequately addressed through standard engineering and construction practices and implementation of geotechnical recommendations, if applicable. Mitigation Measure GEO-1 would reduce any significant impacts to a level considered less than significant under Alternatives 1, 2, or 3.

GEO-5) Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

During operations of Alternatives 1, 2, or 3, sanitary needs would be supplied by a septic system and leach field located near the O&M Building. The onsite sanitary system would require construction and annual operating Onsite Wastewater Treatment System (OWTS) permits from the County. As part of the geotechnical investigations required in Mitigation Measure GEO-1, soil percolation tests would be performed in order to demonstrate that an on-site septic system and leach field is feasible at the planned location, and additional testing may be performed in accordance with Riverside County test procedures prior to final leach field design. The specific location of the leach field and septic system may be adjusted based on the results of preliminary percolation tests. Mitigation Measure GEO-1 would reduce any significant impacts to a level considered less than significant under Alternatives 1, 2, or 3.

GEO-6) Would the Project be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?

There are no bodies of water in proximity to the Alternatives 1, 2, or 3 site, and the site is not near the shoreline or within 50 feet of sea level; therefore, hazards from a seiche or tsunami are considered to be negligible. There are no hillside areas within the Alternative 1, 2, or 3 vicinity that would generate mudflow. In addition, no known active volcanic features occur in the Alternative 1, 2, or 3 vicinity. No impacts would occur.

GEO-7) Would the Project change topography or ground surface relief features?

The topography of the Alternative 1, 2, and 3 areas is very flat, which is also the desirable topography for the solar facility. Construction would not substantially grade, excavate, or require modifying any existing topography. Therefore, implementation of Alternatives 1, 2, or 3 would not significantly change site topography or ground surface relief features.

GEO-8) Would the Project create cut or fill slopes greater than 2:1 or higher than 10 feet?

Construction of Alternatives 1, 2, or 3 would not substantially grade, excavate, or create cut and fill slopes greater than 2:1 or higher than 10 feet, or require modifying any existing topography. Therefore, no impacts would occur, and no mitigation is needed under Alternatives 1, 2, or 3.

GEO-9) Would the Project result in grading that affects or negates subsurface sewage disposal systems?

There are no known existing subsurface sewage disposal systems. Therefore, no impacts would occur, and no mitigation is needed under Alternatives 1, 2, or 3.

GEO-10) Would the Project change deposition, siltation, or erosion that may modify the channel of a river or stream or the bed of a lake?

Site preparation for the proposed solar arrays under Alternatives 1, 2, or 3 could result in modification of current site drainage and erosional processes, and these could result in modifying erosion and sedimentation characteristics downstream of the Project area. Mitigation Measure WATER-2 would require that the Applicant develop and implement a Comprehensive Drainage, Stormwater, and Sedimentation Control Plan prior to construction. The Applicant has modeled stormwater runoff, and concluded that development of the entire study area would cause minor impacts to the existing drainage shed area. The Project site is relatively flat, and has large natural depressions which store stormwater flow and attenuate outflow from the site. Effects of Alternative 1 on stormwater flow during a 100-year storm event would include an increase in flow velocity of 0.04 feet per second, and an increase in outflow off of the Project site of about 2.6 percent (TLA Engineering and Planning 2011). These flows would be mitigated through onsite drainage basins designed to accommodate the increased volume of flow. With implementation of Mitigation Measure WATER-1 and WATER-2 in Section 4.20, impacts would be reduced to less than significant levels.

The impacts of Alternatives 2 and 3 would be reduced even further, as these alternatives would occupy only a portion of the entire study area, and would avoid major active drainages. With implementation of Mitigation Measure WATER-1 and WATER-2 in Section 4.20, impacts would be reduced to less than significant levels.

GEO-11) Would the Project result in any increase in water erosion either on- or off-site?

See GEO-2 and GEO-10 above. The soils under Alternatives 1, 2, or 3 would be subject to wind and water erosion during construction activities. Mitigation Measure WATER-2 would require that the Applicant develop and implement a Comprehensive Drainage, Stormwater, and Sedimentation Control Plan prior to construction. The Plan would identify site surface water runoff patterns and develop mitigation measures that prevent excessive and unnatural soil deposition and erosion throughout and downslope of the Project area and Project-related construction areas. The Applicant has modeled stormwater runoff, and concluded that development of the Project site would cause minor impacts to the existing drainage shed area. The Project site is relatively flat, and has large natural depressions which store stormwater flow and attenuate outflow from the site. Effects of Alternative 1 on stormwater flow during a 100-year storm event would include an increase in flow velocity of 0.04 feet per second, and an increase in outflow off of the Project site of about 2.6 percent (TLA Engineering and Planning 2011). These flows would be mitigated through onsite drainage basins designed to accommodate the increased volume of flow. Mitigation Measure WATER-1 would require development and implementation of a SWPPP, which would prevent excessive and unnatural soil deposition and erosion throughout and downslope of the Project area and Project-related construction areas, and would also include measures for non-stormwater discharge and waste management. The SWPPP would also prevent offsite migration

of contaminated stormwater, changes in pre-Project storm hydrographs, or increased soil erosion. Impacts would be less than significant; no additional mitigation is recommended for Alternative 1.

The impacts of Alternatives 2 and 3 would be reduced even further, as these alternatives would occupy only a portion of the entire study area, and would avoid major active drainages. Mitigation Measure WATER-1 would require development and implementation of a SWPPP, which would prevent excessive and unnatural soil deposition and erosion throughout and downslope of site under Alternatives 2 and 3. The SWPPP would also prevent offsite migration of contaminated stormwater, changes in pre-Project storm hydrographs, or increased soil erosion. Impacts would be less than significant; no additional mitigation is recommended for Alternatives 2 or 3.

GEO-12) Would the Project be impacted by or result in an increase in wind erosion and blowsand, either on- or off-site?

See analysis for GEO-2 above. With implementation of the Applicant's Dust Control Plan, as required by Mitigation Measure AQ-1, impacts would be less than significant for Alternatives 1, 2, or 3.

GEO-13) Be an incompatible land use located adjacent to a state classified or designated area or existing surface mine.

The Alternative 1, 2, and 3 sites are not located adjacent to a state classified or designated area or existing surface mine.

GEO-14) Expose people or property to hazards from proposed, existing or abandoned quarries or mines.

Alternatives 1, 2, or 3 would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines.

4.7.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.7 would be maintained. The potential for relatively large earthquakes to occur is regional, and is not related specifically to the DQSP. In the absence of the Project, the potential for seismic activity would be no different than with the Project. Soils underlying the site may still be subject to hydrocompaction and may contain corrosive properties. If no further Projects are developed on the Project site, no structures would be built that would be exposed to these hazards. Because there would no development of the site, there would be no impacts related to erosion and/or land subsidence.

4.7.6 Cumulative Impacts

The geographic scope for the analysis of cumulative impacts associated with geologic hazards would be limited to the DQSP Project area. The presence of other projects in the cumulative scenario would have no effect on either the severity or the probability of geological hazards or

geotechnical challenges associated with seismicity and/or the character of underlying soils. Such issues are site-specific, and are unaffected by the presence of other projects in the cumulative scenario. Therefore, there are no cumulative impacts associated with geologic hazards (impacts GEO-1, GEO-3 through GEO-6, GEO-8, and GEO-9), or with modification of topography (impact GEO-7).

For impacts to soil resources, including soil erosion, the geographic scope of impacts would include the watershed in which the Project is located. The applicable projects listed in Tables 4.1-1 and 4.1-2 which are in the watershed include Interstate 10, DPV1, West-wide Section 368 Energy Corridor, Blythe PV Project, DPV2, CRSS, RE Crimson Solar Project, Desert Southwest Transmission Line, and BMSP. The temporal scope of the Project's contribution to cumulative impacts would include the entire period from Project construction through Project decommissioning.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

The greatest potential for cumulative impacts with respect to soil erosion would be during the construction or decommissioning phases of any of the reasonably foreseeable future projects. Concurrent construction and decommissioning of the reasonably foreseeable future projects with the Proposed Action could potentially result in higher levels of impacts. The O&M phase of projects is also included in the temporal scope of cumulative impacts because minor alterations in topography and the addition of impervious surfaces could combine to produce cumulative impacts. However, impacts during the operational phase of the projects are expected to be minimal.

Project construction, O&M, and decommissioning of the Project could contribute to cumulative soil erosion impacts. However, SWPPPs (such as the one required in Mitigation Measure WATER-1), and Comprehensive Drainage, Stormwater, and Sedimentation Control Plans (such as the one required in Mitigation Measure WATER-2) are standard construction industry practice, as well as legal requirements for projects over specified thresholds. The DQSP would be required to operate under these requirements, as would the other projects in the watershed. Because soil erosion would be controlled on each individual project, the potential for cumulative soil erosion impacts would be low, and the Project would not contribute to cumulative impacts associated with soil erosion (impacts GEO-2, and GEO-10 through GEO-12).

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The contribution of Alternative 2 to cumulative soil erosion impacts would be lower from those associated with the Proposed Action, because Alternative 2 would occupy only a portion of the entire study area, and would avoid major active drainages. As with the Proposed Action, Alternative 2 would require implementation of a SWPPP under Mitigation Measure WATER-1, and a Comprehensive Drainage, Stormwater, and Sedimentation Control Plan under Mitigation Measure WATER-2. Other projects in the watershed would also be required to comply with similar regulatory requirements.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The contribution of Alternative 3 to cumulative soil erosion impacts would be lower from those associated with the Proposed Action and Alternative 2, because Alternative 3 would a smaller portion of the Project area, and would avoid major active drainages. As with the Proposed Action, Alternative 3 would require implementation of a SWPPP under Mitigation Measure WATER-1, and a Comprehensive Drainage, Stormwater, and Sedimentation Control Plan under Mitigation Measure WATER-2. Other projects in the watershed would also be required to comply with similar regulatory requirements.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. There would be no change to the existing stormwater drainage on the Project site, and therefore no contribution to cumulative soil erosion impacts.

4.7.7 Residual Impacts

Following implementation of the BMPs described in WATER-1 and WATER-2, all adverse impacts on geology and soil resources resulting from construction, operations, and decommissioning of the Project and alternatives would be avoided or substantially reduced.

4.8 Climate Change

4.8.1 Methodology for Analysis

This section evaluates the effects of greenhouse gas (GHG) emissions that would be generated from the Project, as well as the consistency of the Project with the applicable plans and programs that have been implemented by various Federal, state, and local agencies with jurisdiction over the Project area. The section quantifies the potential GHG emissions from construction and operation, as well as reduction of GHG emissions due to fossil-fuel based electricity displacement.

4.8.1.1 CEQA Significance Criteria

The effects of Project-specific GHG emissions are cumulative, and therefore climate change impacts are addressed as a cumulative, rather than a direct, impact. The guidance for determining significance of impacts has been developed from the requirements of AB 32. The guideline addresses the potential cumulative impacts that a project's GHG emissions could have on climate change. Based on Appendix G of the state CEQA Guidelines and the County of Riverside CEQA Environmental Assessment Form, the following criteria indicate that a project could have potentially significant impacts to climate change if it would:

GHG-1) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

GHG-2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As discussed in Section 15064.4 of the CEQA Regulations, the determination of the significance of GHG emissions requires a good-faith effort to assess the significance of impacts from GHG emissions, considering:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The MDAQMD CEQA and Federal Conformity Guidelines (August 2011) specifies 100,000 tons per year (tpy) CO_{2e} and 548,000 pounds per day (lbs/day) CO_{2e} as thresholds for significance. Riverside County uses a significance threshold of 3,000 MT CO_{2e} per year. For projects that exceed this threshold, project-specific mitigation is required, and should demonstrate a 25 percent reduction from the business as usual scenario. These significance criteria are used to provide a context for the magnitude of Project emissions in relation to its contribution to the cumulative impact of climate change.

4.8.1.2 Methodology for Estimating GHG Emissions

Project GHG emissions estimates were developed by the Applicant, and reported in their Air Quality and Greenhouse Gas Technical Study (URS 2015). This study was peer reviewed by BLM staff and consultants. In addition, to supplement the technical GHG emissions information prepared by URS, BLM conducted additional calculations of estimated carbon sequestration and fossil fuel displacement. The methods used to estimate Project construction, operation, and decommissioning emissions are described in Section 4.8.3 below.

4.8.1.3 GHG Emissions Impact Analysis

Independent of NEPA, but pursuant to 40 CFR Part 98, *Mandatory Reporting of Greenhouse Gases Rule*, the US Environmental Protection Agency (USEPA) requires mandatory reporting of GHG emissions for facilities that emit more than 25,000 metric tons of CO₂e emissions per year (USEPA 2013).

For the purposes of this analysis, the annualized GHG emissions for the Project and alternatives are compared to the Federal GHG mandatory emissions reporting threshold of 25,000 MT per year to determine whether the GHG emissions would contribute substantially to climate change. Annualized emissions are calculated by adding the total emissions associated with construction, operations, and decommissioning, and then dividing them by the total lifespan of the Project, which is 30 years. For purposes of CEQA analysis, annualized GHG emissions for the Project and alternatives are compared to the MDAQMD threshold of 100,000 tons per year, and the Riverside County threshold of 3,000 MT per year, to determine whether the GHG emissions are significant under CEQA. Comparison of Project emissions to these thresholds is presented in Table 4.8-2.

4.8.1.4 Climate Change

Climate change is expected to result in a suite of additional potential changes that could affect the natural environment, in a manner that is relevant to the Project. The potential for climate change to affect the Project is discussed qualitatively.

4.8.2 Applicant-Proposed Measures

There are no APMs proposed to address potential effects from GHGs and climate change.

4.8.3 Direct and Indirect Impacts

4.8.3.1 Alternative 1: Proposed Action

Construction

Direct GHG emissions associated with construction are associated with vehicles, equipment, and generators. These emissions were estimated using equipment lists and construction scheduling information from the Applicant. Mass emissions of all criteria pollutants and GHGs from onsite diesel-fueled construction equipment were estimated using equipment-specific OFFROAD2011/2007 software published by the CARB. ARB's EMFAC2014 model was used to generate vehicle class specific emission factors for GHGs for diesel and gasoline fueled on-road vehicles. The analysis used an assumption of a 25-month construction period with 5 construction days per week (21 work-days per month). The weight and speed for equipment and vehicles were

assumed from EMFAC/OFFROAD guidance, EPA AP-42, and experience from other similar solar and construction projects.

The analysis included emissions from vehicles and equipment used both onsite and offsite during construction. Onsite equipment and vehicles included earth moving equipment for site preparation, delivery vehicles, worker vehicles, water trucks, and fuel trucks. The analysis assumed that electricity to support Project construction would be supplied by four onsite generators. Offsite equipment and vehicles included worker vehicles, as well as delivery trucks for Project components, fuel, concrete, aggregate, and water.

The emissions were calculated for each month during the construction period. To allow comparison of the emissions to the regulatory standards based on annualized emissions, the 12 months which represented the highest emissions, months 10 through 21, were used.

The analysis assumed a maximum of 810 vehicle trips per day during peak construction. Workers were assumed to commute an average of 35 miles. A total of 14,400 truck deliveries of equipment, materials, and fuel were estimated throughout the construction period. Distances assumed for deliveries were 10 miles for fuel, 13 miles for aggregate and concrete, and 30.5 miles for equipment and materials. In addition, the analysis assumed that water to be used for construction would be trucked from offsite, resulting in an additional 57,000 truck deliveries during the construction period. All emissions were assumed to occur within the MDAB.

The analysis assumed there would be no indirect emissions associated with Project construction. The power supply for construction was assumed to be onsite generators, so there would be no offsite emissions associated with offsite power supply sources.

Table 4.8-1 shows the total GHG emissions from onsite and offsite vehicle emissions for each month of Project construction, as well as emissions associated with offsite concrete production. Construction would generate a total of 21,158 MT CO₂e over a period of 25 months. This results in annualized construction emissions of 706 MT per year over the 30 year duration of the Project.

Table 4.8-1. Monthly GHG Emissions Associated with Project Construction

Month	CO ₂ (MT)	CH ₄ (MT)	N ₂ O (MT)	Total CO ₂ e (MT)
1	219.14	0.01	0.01	221.15
2	422.69	0.03	0.01	426.75
3	203.56	0.01	0.01	205.60
4	426.72	0.03	0.01	431.04
5	581.18	0.04	0.02	587.30
6	957.47	0.06	0.03	966.94
7	957.47	0.06	0.03	966.94
8	957.47	0.06	0.03	966.94
9	957.47	0.06	0.03	966.94
10	957.47	0.06	0.03	966.94
11	957.47	0.06	0.03	966.94
12	957.47	0.06	0.03	966.94
13	957.47	0.06	0.03	966.94
14	957.47	0.06	0.03	966.94

Table 4.8-1. Monthly GHG Emissions Associated with Project Construction

Month	CO ₂ (MT)	CH ₄ (MT)	N ₂ O (MT)	Total CO ₂ e (MT)
15	957.47	0.06	0.03	966.94
16	957.47	0.06	0.03	966.94
17	1,232.42	0.07	0.03	1,244.18
18	1,232.42	0.07	0.03	1,244.18
19	1,232.47	0.07	0.03	1,244.23
20	1,123.36	0.07	0.03	1,134.17
21	1,123.36	0.07	0.03	1,134.17
22	900.16	0.05	0.02	908.69
23	470.74	0.03	0.01	475.18
24	94.48	0.01	0.00	95.57
25	94.48	0.01	0.00	95.57
Subtotal for Construction Vehicle Emissions				20,084
Subtotal for Offsite Concrete Production¹				1,074
Total for Construction				21,158

1 – Based on 3,702 cubic meters of concrete, and 290 kg CO₂e produced per cubic meter.

Operation and Maintenance

Vehicle Exhaust

The GHG emissions from vehicles and equipment used during operation were estimated using the same methodology described above for construction. The analysis assumed five full-time workers, and water trucks to transport up to 38 AF of water per year. A total of 25 trips per day were assumed for worker commuting and deliveries of materials. As shown in Table 4.8-2, onsite emissions are estimated to be 1.3 tons per year of CO₂e, and offsite emissions are estimated to be 306 tons per year of CO₂e.

Circuit Breaker Fugitive Sulfur Hexafluoride (SF₆)

Emissions of sulfur hexafluoride (SF₆) could be released into the atmosphere due to equipment failure or leakage from electrical equipment such as circuit breakers and transformers that contain SF₆. Although the Applicant has not provided detailed descriptions of the type of electrical equipment or estimates of volumes of SF₆ that would be present onsite, it is likely that Project electrical components would include this material. Project components are commercially available that are hermetically sealed to prevent the escape of SF₆ into the atmosphere. Emissions of SF₆ from a hermetically sealed circuit breaker can only occur due to equipment failure as there is no ability for the user to refill or extract SF₆ due to the factory seal. The California Air Resources Board (CARB) defines hermetically sealed circuit breakers as being designed to be gas-tight and sealed for life (CARB 2014). Project analyses for other power plant projects typically include an assumption that there could be a small leak rate even for hermetically sealed equipment, and generally conclude that the contribution of SF₆ to the overall estimates of Project GHG emissions are not significant. However, to ensure that actual Project operations are consistent with this

analysis, a Mitigation Measure, GHG-1, is required to ensure that any electrical equipment that contains SF₆ be hermetically-sealed.

Carbon Sequestration

Occupation of the Project site by solar arrays would eliminate carbon sequestration that currently occurs by vegetation. The rate of existing carbon uptake by desert vegetation is estimated to be equivalent to 1.48 MT of CO₂ per acre per year, based on a study of Mojave Desert vegetation (Wohlfahrt et al. 2008). Based on the proposed Project acreage of 3,831 acres, the equivalent loss in carbon uptake would be 5,670 MT of CO₂e per year.

Emissions from Equivalent Fossil Fuel-Based Energy

The Project is proposed to produce approximately 450 MW of electrical energy, which would be more than 2.25 billion kilowatt hours (kWh) of electrical energy per year. The Project is not directly resulting in the closure, or preventing the construction of, a fossil fuel facility, so is not being directly credited with GHG reductions. However, for comparison, GHG emissions for a conventional fossil-fuel combustion power plant producing the same electrical energy (kWh) per year as the Project facility are 0.35 and 1.0 MT CO₂e per MWh of electricity produced by gas turbine and coal-fired plants, respectively. Gas turbine and coal-fired plants are estimated to produce approximately 787,500 and 2,250,000 MT CO₂e, respectively, as compared to 1,317 MT CO₂e per year from the Project.

Decommissioning

Decommissioning of the Project would involve removal of the solar equipment and facilities, and transporting all components offsite. Equipment used for decommissioning would generally be similar to that used for construction. However, decommissioning is expected to occur over a shorter duration of approximately one year. Conservatively, the annual GHG emissions for decommissioning are estimated to be one-half that of construction.

Comparison to Thresholds

The combined, annualized emissions of Project construction, operations, and decommissioning are presented in Table 4.8-2. Comparison of those annualized emissions to the MDAQMD and Riverside County thresholds shows that the Project would not exceed any of the thresholds, and therefore is not expected to contribute significantly to climate change through the emission of GHGs.

Table 4.8-2. Annualized GHG Emissions Associated with Proposed Action Construction, Operation, and Decommissioning¹

Annual Emissions	CO ₂ (tons)	CH ₄ (tons)	N ₂ O (tons)	Total GHG – CO ₂ e (tons)	Total GHG – CO ₂ e (MT)
Total construction emissions (amortized over 30 years) ²	777	0.05	0.02	777	706
Onsite emissions in operation ³	1.31	0.00	0.00	1.3	1.2

Table 4.8-2. Annualized GHG Emissions Associated with Proposed Action Construction, Operation, and Decommissioning¹

Annual Emissions	CO ₂ (tons)	CH ₄ (tons)	N ₂ O (tons)	Total GHG – CO ₂ e (tons)	Total GHG – CO ₂ e (MT)
Offsite emissions in operation ³	306	0.01	0.00	306	278
Estimated decommissioning emissions ⁴	365	0.02	0.01	365	332
Total Project (tons/year)	1,449	0.08	0.03	1,449	1,317
MDAQMD CEQA annual threshold (tons/year)	NA	NA	NA	100,000	NA
Riverside County CEQA threshold (MT/year)	NA	NA	NA	NA	3,000
Exceed the thresholds (yes/no)	NA	NA	NA	No	No

Notes:

1 – Note that values in Table 4.8-1 are in MT, while Table 4.8-2 presents emissions in both tons and MT. Comparison of values among tables is not exact due to rounding.

2 – Summed from 25 monthly emissions estimates in URS (2015), then divided by 30 year period.

3 – From Table 4-4 in URS (2015)

4 – Decommissioning vehicle and equipment emissions are estimated to be one-half of construction. There would be no concrete production during decommissioning.

4.8.3.2 Alternative 2: Resource Avoidance Alternative

The GHG emissions associated with Alternative 2 are expected to be the same as those associated with the Proposed Action. The analysis of Alternative 2 assumed that construction would involve the same number of construction workers and duration of construction, the same number of onsite construction vehicles and equipment, and the same number of truck deliveries of project components and equipment. Alternative 2 would involve ground disturbance of a smaller area than the Proposed Action, but the reduction in GHG emissions associated with grading of a smaller area would not be substantial, and overall GHG emissions would be affected only slightly by this difference in the alternatives.

Because the output of Alternative 2 would be the same as Alternative 1, the amount of fossil fuel-based GHG emissions that would be avoided would be the same as Alternative 1. Gas turbine and coal-fired plants are estimated to produce approximately 787,500 and 2,250,000 MT CO₂e, respectively, as compared to 1,317 MT CO₂e per year from Alternative 2.

Based on the rate of existing carbon uptake by desert vegetation and the Alternative 2 size of 2,833 acres, the equivalent loss in carbon uptake would be 4,193 MT CO₂e per year.

Because the GHG emissions of Alternative 2 would be the same as the Proposed Action, GHG emissions associated with Alternative 2 would not exceed any of the thresholds, and therefore are not expected to contribute significantly to climate change through the emission of GHGs.

4.8.3.3 Alternative 3: Reduced Project Alternative

The GHG emissions associated with Alternative 3 would be slightly lower than those associated with the Proposed Action. The analysis of Alternative 3 assumed that construction would involve the same number of construction workers and duration of construction, and the same number of onsite construction vehicles and equipment. Alternative 3 would involve ground disturbance of a smaller area than the Proposed Action, but the reduction in GHG emissions associated with grading of a smaller area would not be substantial. The primary difference in GHG emissions would be emissions associated with truck deliveries of Project components and equipment. Under Alternative 3, truck deliveries would be reduced by about 25 percent, as compared to the Proposed Action and Alternative 2.

The output of Alternative 3 would be 285 MW, or approximately 63 percent that of the Project. The equivalent amount of fossil fuel-based GHG emissions that would be avoided would therefore be less than Alternative 1. Gas turbine and coal-fired plants are estimated to produce approximately 496,125 MT CO_{2e} for gas turbine and 1,417,500 MT CO_{2e} for coal-fired, as compared to 1,261 MT CO_{2e} per year from Alternative 3.

Based on the rate of existing carbon uptake by desert vegetation and the Alternative 3 size of 2,099 acres, the equivalent loss in carbon uptake would be 3,107 MT CO_{2e} per year.

The combined, annualized emissions of construction, operations, and decommissioning for Alternative 3 are presented in Table 4.8-3. Comparison of those annualized emissions to the MDAQMD and Riverside County thresholds shows that Alternative 3 would not exceed any of the thresholds, and therefore is not expected to contribute significantly to climate change through the emission of GHGs.

Table 4.8-3. Annualized GHG Emissions Associated with Alternative 3 Construction, Operation, and Decommissioning

Annual Emissions	CO ₂	CH ₄	N ₂ O	Total GHG – CO _{2e}
Total construction emissions (amortized over 30 years, tons/year) ¹	754	0.04	0.02	754
Onsite emissions in operation (tons/year) ²	1.31	0.00	0.00	1.3
Offsite emissions in operation (tons/year) ²	306	0.01	0.00	306
Estimated decommissioning emissions (tons/year) ³	358	0.02	0.01	358
Total Project (tons/year)	1,419	0.07	0.03	1,419
Total Project (MT/year)	1,290	0.06	0.03	1,290
MDAQMD CEQA annual threshold (tons/year)	NA	NA	NA	100,000
Riverside County CEQA threshold (MT/year)	NA	NA	NA	3,000
Exceed the thresholds (yes/no)	NA	NA	NA	No

Table 4.8-3. Annualized GHG Emissions Associated with Alternative 3 Construction, Operation, and Decommissioning

Annual Emissions	CO ₂	CH ₄	N ₂ O	Total GHG – CO ₂ e
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Notes:

- 1 – Summed from 25 monthly emissions estimates in URS (2015), scaled down for reduced number of truck deliveries, then divided by 30 year period.
- 2 – From Table 4-4 in URS (2015)
- 3 – Decommissioning vehicle and equipment emissions are estimated to be one-half of construction. There would be no concrete production during decommissioning.

4.8.4 Climate Change Effects on the Project

4.8.4.1 Alternative 1: Proposed Action

Climate change is expected to result in environmental changes that could affect the natural environment in the Project area. The potential for climate change effects on the Project is discussed below.

Hydrologic Resources

In California and much of the western U.S., climate change is expected to result in several potential effects related to water resources. These include potential sea level rise, potential changes to snowpack and snowmelt periods, changes to the water flow available to dilute wastewater, changes to surface water temperature, changes in the frequency of flooding and droughts, and potential reductions in surface water supply (DWR 2008; DWR 2011). Of these, the issues of sea level rise, snowpack and snowmelt, dilution of wastewater, and change in surface water temperature are not relevant to the Project.

Flooding, Drainage, and Erosion

Climate change is anticipated to affect the frequency and intensity of extreme weather events, including large storm events and droughts in western watersheds, such as the Colorado River basin where the Project is located (DWR 2008; DWR 2011). Although the degree of change is a subject of substantial debate, most investigations concur that the Colorado River watershed, including the Project site and its vicinity, would experience an increase in the frequency and intensity of high rainfall and flood events (Cooley et al. 2009). This could result in an increase in potential stormwater runoff and flooding, and an increase in erosion and sedimentation onsite and downstream from the site. Increases in the intensity or frequency of droughts are discussed in terms of water resources availability, below.

As discussed in Section 2.3.7.9, the current stormwater flow system into and through the Project would be maintained, and stormwater would not be diverted. The analysis of the effect of stormwater flow on Project structures, presented in Section 4.20, shows that, although site grading and vegetation removal would alter stormwater flow onsite, the amount of scour that would occur would not threaten the stability of Project structures.

Water Resources Availability

As discussed in Section 3.20, the Project site and immediate vicinity contain only ephemeral drainages and washes. There are no perennial streams or other perennial waterways located on site, or upstream of the site. The project may use surface water from PVID for water supply during construction or operation. The impact of this use is evaluated in Section 4.20, and indicates that there would be no impacts to surface water supplies. Therefore, changes to surface water availability in the region would not affect the Project.

The Project may rely on groundwater for water supply during both construction and operation. An analysis of the amount of groundwater available for the Project is presented in Section 4.20, and concludes that sufficient groundwater is available to support Project construction. Estimates of the potential effects of climate change on the frequency and amount of rainfall in the west vary; however, most studies concur that in the desert southwest, some degree of reduction of precipitation would occur. Seager et al. (2007) and Christensen et al. (2004) completed extensive reviews and modeling of potential climate change effects on the Colorado River watershed and other southwestern watersheds, including several climate change scenarios. The authors concluded that precipitation and runoff within the watershed could generally decrease, while periods of drought could increase, resulting in an overall reduction in the availability of groundwater in the region. These scenarios could result in moderate to substantial effects on water supply availability, and could affect the ability of water rights holders along the Colorado River to divert their full entitlements. However, the timeframe of these changes would be long-term. The Project would only rely on relatively large volumes of groundwater for Project construction, which would be completed within 25 to 48 months. Long-term climate changes would not be expected to substantially affect groundwater availability within this short timeframe. Therefore, a reduction in groundwater availability due to climate change is not expected to affect the Project.

Biological Resources

Biological resources could be affected as a result of climate change in California. Distribution patterns of species are generally expected to shift according to regional changes in temperature and precipitation, while the location of wildlife migration corridors and the extent of invasive species also could be altered (USFWS 2010).

Fisheries

The Project would not contain any perennial or other surface waters that contain fisheries resources, and would not affect or be affected by changes in fisheries characteristics.

Habitat Values of Mitigation Lands

As discussed in Sections 4.3 and 4.4, the Project would require mitigation for biological resources values that would be lost as a result of the loss of habitat associated with the Project. The proposed mitigation lands would be required to be equivalent in terms of habitat value and at replacement ratios as specified in Sections 4.3 and 4.4. Climate change could result in adverse effects on biological resources located on these mitigation lands. However, given that mitigation lands must be similar in biological resources value as compared to lost resources on site, it is anticipated that the effect of climate change on the mitigation lands would be similar to the effect that would have occurred on the Project site, if the Project were not built. Therefore, potential reductions in the

biological resources values of mitigation land values resulting from climate change are expected to be similar to onsite conditions in the absence of the Project.

Hazards

Climate change studies have concluded that hazards associated with wildland fires and increased potential for heat stress for workers during heat waves could increase as a result of climate change (IPCC 2007; ISDR 2008).

Wildland Fire Risks

Potential risks associated with wildland fire are discussed in Section 4.21, *Wildland Fire*. As described in Section 3.21, the risk of wildland fire to the Project would be moderate based on the FHSZ, due to the sparse vegetation. As discussed in Section 2.3.7.3, fire protection systems would be included in the Project design. Although risks for wildland fire could increase due to an increase in the frequency of extreme weather events that could generate wildfires, such as increased frequency of drought and heat waves (IPCC 2007; ISDR 2008), the potential for wildland fire to affect Project structures would still be low. Therefore, no additional mitigation is recommended.

Heat Waves

The frequency of occurrence and the severity of heat waves could increase as a result of climate change (IPCC 2007; ISDR 2008). Heat waves could result in increased potential risk to Project employees working outside, especially during construction. All Project activities would occur under a site-specific Health and Safety Plan, as well as Federal OSHA and CalOSHA requirements. The Applicant proposes to modify work schedules as needed, in summer, to protect workers from heat stress. No further actions are recommended.

Soil Moisture

As discussed in Section 3.20, almost all rainfall that occurs in this region of California is lost through evaporation and evapotranspiration, and therefore soil moisture levels at the Project site are characteristically low. Because climate change could result in increases in droughts and heat waves, and an overall reduction in precipitation, long-term effects of climate change could include a reduction in soil moisture content at the site and regionally. However, reductions in soil moisture content would not affect Project-related operations, and would not require any change in water resources usage.

Fugitive Dust

As discussed in Section 4.2, *Air Resources*, fugitive dust emissions would require mitigation during operation of the Project. Mitigation Measure AQ-2 would mitigate operation period fugitive dust emissions to ensure compliance with state and Federal regulations and requirements. Although climate change could result in some degree of reduction of soil moisture, as discussed above, soil moisture is already very low under current conditions. Any further reductions in soil moisture would not be substantial in terms of the absolute amount of water contained in onsite soils. Therefore, any potential further reduction in soil moisture associated with climate change is not anticipated to result in a substantial increase in fugitive dust emissions.

4.8.4.2 Alternative 2: Resource Avoidance Alternative

The potential effects of climate change on Alternative 2 would be the same as those discussed for Alternative 1, except that the area affected by Alternative 2 would be reduced.

4.8.4.3 Alternative 3: Reduced Project Alternative

The potential effects of climate change on Alternative 3 would be the same as those discussed for Alternative 1, except that the area affected by Alternative 3 would be reduced.

4.8.5 Application of CEQA Significance Thresholds

GHG-1) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

As shown in Table 4.8-2, Alternative 1 would not generate GHG emissions that would exceed applicable thresholds of significance for GHG emissions. The GHG emissions associated with Alternative 2 are expected to be the same as those associated with Alternative 1. As shown in Table 4.8-3, the GHG emissions of Alternative 3 would be reduced from those associated with Alternative 1. Overall, the total GHG emissions for all phases amortized over the life of Alternatives 1, 2, or 3 would not exceed MDAQMD or Riverside County thresholds, and would be less than significant. In addition, Alternatives 1, 2, or 3 would result in a substantial benefit by offsetting GHG emission from fossil-fuel-generated electricity, and would assist in meeting the state's adopted Renewable Portfolio Standard (RPS).

GHG-2) Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Since Alternatives 1, 2, or 3 would result in a significant offset of regional air emissions associated with energy production from fossil fuels, a net reduction in GHG emissions could result. Alternatives 1, 2, or 3 would serve to meet the state's goals for the RPS, which has been identified by the state as a means of meeting the goals of AB 32 to reduce emissions to 1990 levels by the year 2020.

However, because Alternative 3 would generate 285 MW, as compared to the 450 MW that would be generated under Alternative 1 or Alternative 2, Alternative 3 would not be as effective as the other action alternatives in off-setting GHG emissions from fossil fuels.

4.8.6 Alternative 4: No Action Alternative

4.8.6.1 Direct and Indirect Impacts

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.8 would be maintained. None of the GHG emissions-related impacts of the action alternatives would occur.

However, Alternative 4 would not displace the generation of GHG emissions from existing fossil-fueled power plants and would result in the continued long-term adverse impact associated with annual GHG emissions compared to implementation of any of the action alternatives.

4.8.7 Cumulative Impacts

By definition, the climate change impacts discussed in Section 4.8 constitute a cumulative impact analysis, because they are the result of the cumulative GHG emissions from all sources worldwide.

All Action Alternatives

Construction, Operations, and Decommissioning

The direct GHG emissions associated with construction, operation, and decommissioning of any of the action alternatives would contribute to cumulative climate change effects on resources not just within the Project area, but throughout the world. The Proposed Action and Alternative 2 would generate approximately 1,318 MT per year CO₂e, and Alternative 3 would generate approximately 1,261 MT per year CO₂e, which would not contribute considerably to a cumulative GHG impact. In addition, the removal of plants from within the Project area would reduce the amount of carbon intake from terrestrial vegetation, but only by a minimal amount. Virtually all of the cumulative projects described in Section 4.1.5, Cumulative Scenario Approach, would also contribute to warming due to the generation of short-term and/or long-term GHG emissions associated with their construction, operation, and decommissioning.

As discussed in the Final Western Solar Plan issued in July 2012 (BLM and DOE 2012), utility-scale solar energy development contributes relatively minor GHG emissions, generally from emissions from heavy equipment used during the construction phase, and from vehicular emissions. However, utility-scale solar energy production also results in reduced CO₂ emissions from utilities by offsetting emissions from new fossil fuel energy sources. Overall, CO₂ emission offsets from increased solar energy production can range from a few percentage points to more than twenty percent in some study area states. According to the analysis in the Western Solar Plan, “an estimated 716 kg (1,578 lb) of CO₂ would be displaced annually per megawatt-hour of solar energy produced” (BLM and DOE 2012, § 5.11.1.2. Table 5.11-1, and § 5.11.4). Since GHG emissions are aggregated across the atmosphere and cumulatively contribute to climate change, it is not possible to determine the specific impact on climate change from GHG emissions associated with the action alternatives, or with the other cumulative projects (impact GHG-1).

Because an objective of the Project is to comply with state policies intended to reduce GHG emissions, the Project would not contribute to cumulative conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (impact GHG-2).

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. Alternative 4 would not generate

any GHG emissions. However, the No Project Alternative also would not assist in meeting AB 32 or Executive Order S-3-05 emission reduction targets, nor would it offset emissions generated by fossil-fuel-based sources of energy. Therefore, the No Project Alternative could have a greater contribution to climate change than the action alternatives.

4.8.8 Residual Impacts

The long-term displacement of GHG emissions from fossil fuel-based power would be a residual beneficial impact of the Project. There would still be GHG emissions after mitigation has been incorporated; however, they would not be a substantial contribution to climate change.

4.9 Hazards and Hazardous Materials

4.9.1 Methodology for Analysis

This analysis of potential impacts of the Proposed Action and Alternatives related to Hazards and Hazardous Materials focuses on possible impacts to the health and safety of the public. Impacts are identified and evaluated based on relevant BLM standards, policies, and guidelines. The analysis is based on information provided in the POD, the Applicant's Preliminary Hazardous Materials Management and Emergency Response Plan, and the Phase I Environmental Site Assessment.

Environmental Site Contamination

The analysis evaluates the potential for ground-disturbing activities to expose workers or members of the public to pre-existing site contamination.

Unexploded Ordnance

The analysis evaluates the potential for ground-disturbing activities to encounter unexploded ordnance (UXO).

Risk of Accidents and Spills of Hazardous Materials

This analysis reviews and assesses the potential for the transportation, storage, and use of hazardous materials to impact the health and safety of the public. Hazardous materials, including fuels, lubricants, solvents, and adhesives must be used for Project construction and operation. The analysis examines the type hazardous materials to be used, and the Applicant's proposed procedures for handling, storing, transporting, and disposing of hazardous materials and hazardous wastes.

In their POD and Preliminary Hazardous Materials Management and Emergency Response Plan, the Applicant proposes to use engineering and administrative controls as part of the Proposed Action and Alternatives. Engineering controls are the physical or mechanical systems that can prevent the spill of hazardous material from occurring, or that can either limit the amount of a spill or to a confined area. Examples of engineering controls are storage tanks and secondary containment basins. Administrative controls are the rules and procedures that workers at the facility must follow that would help to prevent accidents or to minimize releases if they do occur. These procedures typically are established in worker safety training and emergency response plans. Both engineering and administrative controls can act as methods of prevention or as methods of response and minimization. In both cases, the goal is to prevent a spill from moving off-site and from causing harm to the public or the environment.

This analysis reviews and evaluates the Applicant's proposed use of hazardous materials as described by the Applicant. In conducting this analysis, these three steps were followed:

Step 1: Review the types and quantities of hazardous materials proposed for onsite use as listed in the POD and Preliminary Hazardous Materials Management and Emergency Response Plan.

Step 2: Review and evaluate the engineering and administrative controls proposed by the Applicant to prevent spills and respond to accidents.

Step 3: Evaluate the potential impacts on the public of a greatest-consequence spill of hazardous materials, as reduced by the engineering and administrative controls proposed by the Applicant. When such controls would be sufficient to prevent impacts, no further mitigation is recommended. If additional mitigation measures would further reduce or avoid impacts of the Proposed Action or an Alternative, additional prevention and response controls are proposed.

Public Health

The analysis evaluates the potential for the Proposed Action and Alternatives to increase public exposure to vector-borne diseases and to Coccidioidomycosis, commonly known as valley fever.

Transmission Line Safety and Nuisance

This analysis of potential effects of the Proposed Action and alternatives related to transmission line safety and nuisance evaluates the applicable requirements of design-related laws, ordinances, regulations, standards, and policies. If the gen-tie line and distribution line that would be constructed comply with applicable laws, then the Proposed Action and alternatives would not have a measurable effect related to Transmission Line Safety and Nuisance. Other potential hazards considered include interference with radio-frequency communication, hazardous shocks, nuisance shocks, and EMF exposure. Impacts related to noise from corona discharge are addressed in Section 4.12, *Noise*, and impacts related to fire hazard-related risks are addressed in Section 4.21, *Wildland Fire*.

Emergency Response

The analysis evaluates the Proposed Action and Alternatives to assess potential impacts to public safety that could result if the Proposed Action or an Alternative were to impair implementation of an emergency response or evacuation plan. This assessment first determines whether local emergency response or evacuation plans have been adopted, and then whether the Proposed Action or an Alternative would impede emergency evacuation routes or emergency response actions.

Aircraft Operations

The analysis reviews the Proposed Action and Alternatives with respect to the RCALUCP for Blythe Airport.

Intentionally Destructive Acts

Intentionally destructive acts could include malicious mischief, vandalism, or terrorist attacks. This analysis of impacts related to intentionally destructive acts is based on the screening criteria for vulnerability assessments of chemical facilities and electric power infrastructure and assesses the following questions: Is the Project a critical electric infrastructure facility? Does the facility use any of the chemicals on the list of regulated substances in 40 CFR §68.130? What would be the estimated severity of impact from a release of hazardous materials from the site or from power disruption?

Abandoned Mine Lands

The Applicant's Phase I Environmental Site Assessment did not identify any abandoned mine lands within one mile of the Project site. Therefore, the Proposed Action and alternatives would result in no impacts related to abandoned mine lands.

4.9.1.1 CEQA Significance Criteria

The criteria listed below were used to determine if the Project would cause or exacerbate hazards on and in the vicinity of the Project. These criteria are the same as the significance criteria for Hazards and Hazardous Materials listed in the CEQA Environmental Checklist, Appendix G of the state CEQA Guidelines. Under CEQA, the proposed Project and alternatives would have a significant impact on hazards and hazardous materials if they would:

HAZ-1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

HAZ-2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

HAZ-3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

HAZ-4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

HAZ-5) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would result in a safety hazard for people residing or working in the project area.

HAZ-6) For a project within the vicinity of a private airstrip, would result in a safety hazard for people residing or working in the project area.

HAZ-7) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

HAZ-8) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The following additional significance criteria from the County of Riverside CEQA Environmental Assessment Form are used in the analysis. A Project could have potentially significant impacts if it would:

HAZ-9) Result in an inconsistency with an Airport Master Plan.

HAZ-10) Require review by the Airport Land Use Commission.

4.9.2 Applicant-Proposed Measures

Section 2.3.7.1 describes the elements of the Applicant's Preliminary Hazardous Materials Management and Emergency Response Plan, which would be completed and provided to BLM

and the County for review and approval prior to the beginning of construction. The completed Plan would identify expected wastestreams; specify how waste would be sampled, analyzed, and characterized; and specify potential waste disposal locations for different categories of wastes. Elements of the Plan relevant to waste management would include waste determination procedures, waste disposal locations, container management, inspection requirements, preparedness and prevention requirements, and requirements for packaging, placarding, manifests, and record-keeping and reporting. The Plan would also specify BMPs to be used in the case of discovery of unanticipated hazardous materials.

BMPs to be implemented during construction would include:

- Keep materials in their original containers with the original manufacturer's label and resealed when possible;
- Avoid storage of excessive quantities of chemicals by procuring and storing only the amounts needed;
- Encourage mobile refueling of vehicles on site to minimize stationary tank storage of fuel and other hazardous materials;
- Follow manufacturer's recommendation for proper handling and disposal;
- Conduct routine inspections to ensure that all chemicals on-site are being stored, used, and disposed of appropriately;
- Perform timely maintenance on vehicles/equipment that are leaking oil or other fluids, and place drip pans under the leak when the vehicle/equipment is parked prior to the maintenance event;
- Ensure that no hazardous materials, chemicals, fuels, or lubricating oils would be stored within 100 feet of any wetland, water body, or water supply well, or within any designated municipal watershed;
- Refuel all construction equipment at least 100 feet from any water body, water well or wetland;
- Ensure that all personnel dealing with hazardous materials are properly trained in the use and disposal of these materials in accordance with local, state, and Federal regulations;
- Ensure that all storage tanks proposed to be brought on site will meet applicable codes; and
- Maintain Material Safety Data Sheets available on the site for use during Project construction and operation.

Oil storage on site will be limited to the minimum amount necessary to safely maintain and operate equipment and transformers during construction and O&M.

The Applicant proposes to store up to 2,500 gallons each of diesel and gasoline during construction, which exceeds 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, or extremely hazardous substances above the threshold planning quantity. As a result, the Applicant would develop and implement a Hazardous Materials Business Plan (HMPB) in coordination with Riverside County Department of Environmental Health and County fire officials. In addition, because the Project would involve onsite storage of more than 1,320 gallons of oil or oil products, the Applicant would develop and implement a Spill Prevention, Control, and

Countermeasure (SPCC) Plan. The Applicant has developed a summary outline of an SPCC Plan, which describes the issues that would be addressed in a completed Plan. Issues to be addressed would include a diagram showing the facility and locations of oil storage, description of the type of oil, methods used to prevent and control releases, and requirements for inspections, testing, employee training, and reporting. Appropriately sized and supplied spill containment kits would be maintained onsite in the area of the O&M Building, and operations employees would be trained on the appropriate spill prevention, response, and containment procedures.

The Applicant has developed a preliminary summary of a SWPPP, which would be developed and implemented prior to Project construction. These would include managing and disposing of wastes in accordance with applicable regulations and prohibiting the storage of hazardous materials or refueling of vehicles within 100 feet of a wetland, water body, or water supply well.

If the Project implements ESSs, the units would be situated in pre-fabricated metal containers that have an appropriate fire suppression system designed in compliance with Section 608 of the International Fire Code. The units would also have apron containment systems to prevent the escape of spills or leaks of fluids. The units would also be designed to comply with Article 480 of the electrical code, which specifies requirements for insulation and venting.

As discussed in Section 4.1.6, the impact analysis assumes that the APMs have been implemented, and these measures are therefore requirements for approval of the Project. The APMs are to be incorporated into the EICMPP/MMRCP, along with the agency-required mitigation measures.

4.9.3 Direct and Indirect Impacts

4.9.3.1 Alternative 1: Proposed Action

Environmental Site Contamination

Construction

Construction would require earth-moving, grading, trenching, and other activities which would disturb site soils. These activities could result in release of contaminated materials, exposure of site workers to metals and other contaminants present in the soils, and/or exposure of the public to contaminants if fugitive dust was to be blown offsite.

As described in Section 3.9.1.1, the Phase I Environmental Site Assessment conducted for the Project site in 2015 did not identify evidence of any releases of hazardous substances or petroleum products on the BLM portion of the Project site, or in the one-mile search radius, based on records searches and visual surveys. The site is undeveloped, so no past use of hazardous materials on the site has been documented. De minimis conditions identified on the BLM land during the site reconnaissance included trash and debris. Therefore, the potential for encountering hazardous substances in containers or in contaminated soils on the BLM land is low.

The Phase I ESA documented that two nearby groundwater supply wells on BLM land were observed to be open and unsecured, presenting the potential for groundwater contamination to be present. A third well, covered only by a sheet-metal plate, was found on the private land parcel. Unsecured wells can act as conduits for surface-based contamination or wastes to enter groundwater aquifers. The Applicant conducted a limited Phase II Environmental Site Assessment, which included collection and analysis of a grab sample from the well on the private land parcel. That assessment did not identify any water quality impacts to that well. However, there have been

no subsequent response actions for the wells on BLM land, including securing of the groundwater wells or sampling of environmental media, to verify whether site contamination currently exists.

Hazardous substances, in the form of partially-filled oil and lubricant containers and other trash and debris, were observed on the private land parcel. There has been no further investigation or environmental sampling to determine if soil contamination has resulted. Therefore, there is a potential for encountering hazardous substances and/or contaminated soil during intrusive work on the private land parcel.

During construction activities for the Proposed Action, the potential exists that undocumented subsurface utilities or tanks might be encountered and damaged, resulting in a release of a hazardous material. Based on the results of the Applicant's Phase I Environmental Site Assessment, the potential for the presence of subsurface utilities is expected to be low. However, the potential for such incidents would be further reduced by thoroughly screening for subsurface structures in areas prior to commencement of any subsurface work. Screening activities would include use of DigAlert (Underground Services Alert of Southern California), visual observations, hand digging, and use of buried line locating equipment.

To establish baseline environmental conditions, Mitigation Measure HAZ-1 requires the Applicant to perform a Phase II Environmental Site Assessment (ESA) prior to beginning construction. The scope of the Phase II ESA would include groundwater sampling in the vicinity of the two uncapped onsite wells, followed by capping of the onsite wells, to establish baseline groundwater quality and protect against future releases. In addition, the Phase II ESA would include removal of oil and lubricant containers identified on the private land parcel in the Phase I ESA, sampling of soil to identify potentially contaminated areas, and removal of any identified contaminated soil.

Fugitive dust would be generated during construction activities. Because construction would be temporary, long-term exposures of site workers to fugitive dusts are not anticipated to occur. Implementation of dust suppression measures in Mitigation Measures AQ-1 and AQ-2 would reduce the potential for worker exposure to any hazardous materials that may be present in site soils by reducing the amount of dust released from construction activities.

Operation and Maintenance

Operations would involve a much lower amount of ground disturbance than construction, and would thus have a lower potential for exposing site workers or the public to hazardous substances in site soils. Ground disturbance during operations would be limited to small-scale repair and maintenance projects. In addition, these activities would likely occur in areas which had already been disturbed during construction, and would therefore be unlikely to encounter unexpected hazardous substances.

Fugitive dust generation associated with disturbance would also be of a much smaller scale than that associated with construction. Implementation of Mitigation Measure HAZ-1, which requires the Applicant to prepare and implement a site-specific Hazardous Materials Management and Emergency Response Plan, would also apply to operations and maintenance activities.

Decommissioning

Like construction, decommissioning is also expected to require earth-moving, grading, trenching, and other activities which would disturb site soils. The scale of these activities would be reduced from that of construction. In addition, these activities would likely occur in areas which had

already been disturbed during construction, and would therefore be unlikely to encounter unexpected hazardous substances. Therefore, the potential for exposure of site workers and the public to hazardous substances during decommissioning is expected to be lower than that for construction.

Fugitive dust would be generated during decommissioning activities. Because decommissioning would be temporary, long-term exposures of site workers to fugitive dusts are not anticipated to occur. Mitigation Measures AQ-1, AQ-2, and HAZ-1 would apply to decommissioning, so would minimize potential exposures to existing hazardous materials during decommissioning.

Unexploded Ordnance

Construction

As discussed in Section 3.9.1.1, ordnance was used at the former Blythe Army Airfield located approximately 1.5 miles north of the Project site, and UXO discoveries have been reported during cultural resource studies in the area, and as part of construction efforts at the Modified BSPP site north of I-10. No indication was found suggesting these materials were present on the Project area during the Phase I ESA. However, because of the former use of public lands in the area for military training, there is potential for discarded military munitions, other explosives, and unexploded ordnance (collectively, UXO) to be encountered on the surface, or in subsurface excavations.

UXO presents an immediate risk of acute physical injury from fire or explosion resulting from accidental or unintentional detonation. Surface and shallow sub-surface UXO could be disturbed by vehicles, workers walking, and/or excavation using shovels or similar hand tools, and deeper subsurface UXO could be disturbed by the earth movement and excavation processes that would be required for development of the Proposed Action. With proper training of site workers in the recognition, avoidance, and procedures to be implemented if suspect UXO are discovered, as required by Mitigation Measure UXO-1, the potential risks to workers from encountering UXO would be reduced, but not completely avoided.

Operation and Maintenance

Operations would involve a much lower amount of ground disturbance than construction, and would thus have a lower potential for exposing site workers or the public to UXO. Ground disturbance during operations would be limited to small-scale repair and maintenance projects. In addition, these activities would likely occur in areas which had already been disturbed during construction, and would therefore be unlikely to encounter UXO.

Decommissioning

Like construction, decommissioning is also expected to require earth-moving, grading, trenching, and other activities which would disturb site soils. The scale of these activities would be reduced from that of construction. In addition, these activities would likely occur in areas which had already been disturbed during construction, and would therefore be unlikely to encounter UXO. Therefore, the potential for exposure of site workers and the public to UXO during decommissioning is expected to be lower than that for construction.

Risk of Accidents and Spills of Hazardous Materials

Construction

Hazardous materials which would be used for construction of the Proposed Action include fuels, herbicides, lubricants, solvents, and adhesives. The use, storage, and disposal of hazardous materials and wastes associated with the Proposed Action could result in potential adverse health and environmental impacts if these materials were released to the environment through accidents or spills. Potential direct and indirect impacts of such releases could include degradation of soil and water quality, or exposure of humans and wildlife to hazardous materials.

As discussed in Sections 2.3.7.1 and 4.9.2, the Applicant has developed preliminary management plans related to hazardous materials and waste management. These include the Preliminary Hazardous Materials Management and Emergency Response Plan, Hazardous Materials Business Plan (HMBP), SWPPP, and SPCC Plans. These plans specify procedures for storage, use, transport, and disposal of hazardous materials and waste.

The Applicant proposes to store up to 2,500 gallons each of diesel and gasoline during construction, which exceeds 55 gallons of a liquid, 500 pounds of a solid, or 200 cubic feet of compressed gas, or extremely hazardous substances above the threshold planning quantity. As a result, the Applicant would develop and implement a HMBP in coordination with Riverside County Department of Environmental Health and County fire officials. The HMBP would include an inventory of hazardous materials, site map and building floor plans, emergency response plan, training information, a description of hazardous materials handling and segregation, and plans for monitoring.

Because the Project would involve onsite storage of more than 1,320 gallons of oil or oil products, the Applicant would develop and implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan. The Applicant has developed a summary outline of an SPCC Plan, which describes the issues that would be addressed in a completed Plan. Issues to be addressed would include a diagram showing the facility and locations of oil storage, description of the type of oil, methods used to prevent and control releases, and requirements for inspections, testing, employee training, and reporting. Appropriately sized and supplied spill containment kits would be maintained onsite in the area of the O&M Building, and operations employees would be trained on the appropriate spill prevention, response, and containment procedures.

The SWPPP would define procedures for managing and disposing of wastes in accordance with applicable regulations, and would also define storage locations and fueling procedures to protect water resources. The SPCC Plan would address the storage of oil or oil products, and would include a diagram showing the facility and locations of oil storage, description of the type of oil, methods used to prevent and control releases, methods to be used to clean-up and dispose of recovered materials, and requirements for inspections, testing, employee training, and reporting.

Compliance with existing regulations would reduce hazards, but would not completely avoid hazards to construction workers, the public, and the environment. Although the Applicant proposes to refuel construction equipment at least 100 feet from any water body, water well or wetland, soil and groundwater contamination could still result from releases from fuel tanks on mobile fuel trucks or equipment, or as a result of the refueling process. Mitigation Measure WATER-1 would require that all refueling and maintenance would occur at a designated area, within secondary containment with a volume sufficient to contain the largest fuel tank. In addition

to the spill response and reporting requirements of the HMBP, SPCC, and SWPPP, Mitigation Measure WATER-1 would require the Applicant to notify BLM within 24 hours of any release outside of containment. Once construction has begun, Mitigation Measure HAZ-1 would require periodic sampling and analysis of groundwater to verify that Project construction does not release contamination.

Routine transportation of hazardous materials to the site, and wastes from the site, could create a hazard to the public or the environment if materials were improperly handled, or indirectly could result in an incremental increase in the potential for accidents. The Applicant would comply with Federal and state regulations regarding the transportation of hazardous materials and wastes, with stringent packaging requirements, licensing and training for hazardous materials truck operators, chemical handlers, and hazardous waste haulers.

Because of the relatively low volumes of hazardous materials and fuels onsite at any time, requirements for immediate response to releases, and flat topography that limits site runoff, it is unlikely that any releases would extend beyond the boundaries of the Project area before they are identified and addressed. The closest residence (apparent occupied mobile home trailer) is located approximately 3,700 feet north of the northeast corner of the Proposed Action boundary. The next two closest sensitive air quality receptors are located in the residential community of Nicholls Warm Springs/Mesa Verde approximately 4,800 feet north of the northeast corner of the Proposed Action boundary. Although members of the public could potentially be present outside the Proposed Action area fence, there are no adjacent land uses or local residents which would result in the presence of large number of people who could be impacted by a release of hazardous materials.

Operation and Maintenance

Operation and maintenance of the Proposed Action would require the transport, use, and disposal of hazardous materials and hazardous wastes similar to those associated with construction. During operation, the only chemicals would be fuels and lubricants for vehicles. The Hazardous Materials Management and Emergency Response Plan, HMBP, SWPPP, and SPCC Plans described for construction would also be applicable to operation of the Proposed Action. The HMBP would be reviewed and approved by the local CUPA, the Riverside County Department of Environmental Health, which would be responsible for facility inspections. In general, the amounts of hazardous materials onsite during operations are expected to be much lower than those associated with construction. Therefore, the potential for releases of hazardous materials to present a risk to the public is expected to be lower than that associated with construction.

Limited pesticide use to control noxious weeds would occur, in accordance with a BLM-approved Integrated Weed Management Plan (IWMP). Pesticide use, if needed, would be limited to non-persistent, immobile pesticides applied only in accordance with manufacturer directions and all regulations for pesticide use. Any pesticide applications would be conducted within the framework of BLM and Department of Interior policies.

Similar to construction, compliance with existing regulations would reduce hazards, but would not completely avoid the potential for releases. During operations, Mitigation Measure HAZ-1 would require periodic site inspection, sampling, and analysis of groundwater and the leach field area to verify that Project operations do not release contamination.

Decommissioning

As discussed in Section 2.3.6, the Applicant has developed a Draft Decommissioning and Site Reclamation Plan (Desert Quartzite 2015) (to be re-titled as Decommissioning and Site Restoration Plan when finalized) which describes the general outlines of the proposed decommissioning activities. Prior to decommissioning, a new Phase I Environmental Site Assessment would be conducted to document existing conditions at the time, including the potential presence of hazardous materials or environmental conditions that occurred during construction or operations. If hazardous materials or environmental conditions are identified, a Phase II ESA that would include sampling and, if necessary, response actions, would be undertaken before decommissioning begins. All hazardous materials would be removed from the site before structures are removed. Most of the Proposed Action facilities would be composed of materials that can be recycled, including glass, semiconductor material, aluminum, steel, and wiring. Materials to be removed from the site and recycled or resold include the steel tables and posts, wiring, and PV modules themselves. PV modules damaged during construction or removed at the end of the life of the Proposed Action would either be recycled or resold, or would be disposed of in accordance with local, state, and Federal regulations. Decommissioning of the Proposed Action would require the use of fuel and lubricants for construction vehicles and equipment, as well as the transport and disposal of hazardous materials used at the facility.

As with construction and operations, compliance with existing laws and regulations would reduce, but not completely avoid potential impacts related to the routine use, storage, transportation, and disposal of hazardous materials associated with decommissioning. The site inspection, monitoring, and other requirements of Mitigation Measure HAZ-1 would apply throughout decommissioning, to verify that decommissioning activities do not release contamination.

Public Health

Construction, Operations, and Decommissioning

As described in Section 3.9.1.2, incidence of WNV in Riverside County, and therefore the risk to public health from this vector-borne disease, is extremely low. Implementation of Mitigation Measure WATER-2, which requires a comprehensive drainage, stormwater, and sedimentation control plan, would reduce the potential for unintentional ponding of water onsite or downstream of the Proposed Action area. This would reduce the risk of mosquito breeding on or near the site, and therefore would reduce the risk for workers and the public of contracting vector-borne diseases.

Also described in Section 3.9.1.2, incidence of valley fever in Riverside County is low. Fugitive dust generated during construction, operations, or decommissioning could expose workers to *Coccidioides* fungal spores that may be present in desert soils. Implementation of Mitigation Measure AQ-1 would reduce fugitive dust during the construction phase, which would reduce the risk to workers of contracting valley fever.

Transmission Line Safety and Nuisance

Construction and Decommissioning

As the gen-tie line would not be energized except during operations, there would be no hazard or nuisance from the gen-tie line associated with construction or decommissioning.

Operations

Transmission line safety and nuisance issues may be associated with operation of the Project gen-tie line. Impacts associated with operation of the gen-tie line may include interference with radio-frequency communication, hazardous and nuisance shocks, and electro-magnetic field (EMF) exposure.

Interference with Radio-Frequency Communication

Transmission lines may have surface irregularities, surface discontinuities, and related corona discharge which may affect radio-frequency communication. Although corona can generate high frequency energy that may interfere with broadcast signals or electronic equipment, this is generally a concern only for lines of 345 kV and above. Gap discharges or arcs also can be a source of high frequency energy. Gap discharges occur when an arc forms across a gap in loose or worn line hardware. It is estimated that over 90 percent of interference problems for electric transmission lines are due to gap discharges. When identified, gap discharges can be located and remedied by utilities. Although corona or gap discharges related to high frequency radio and television interference impacts would be limited and very localized.

To reduce the potential for radio frequency interference, Mitigation Measure TLSN-1 would require the Applicant to limit the conductor surface electric gradient in accordance with the IEEE Radio Noise Design Guide for High-Voltage Transmission Lines, and to provide a mechanism for resolution of any interference complaints. In addition, the proposed gen-tie line would be built and maintained in accordance with applicable standards and regulations, including those prescribed by the CPUC and State of California Rules for Overhead Electric Line Construction, General Order No. 95 (GO-95).

Hazardous and Nuisance Shocks

Operation of the proposed gen-tie line could result in hazardous and/or nuisance shocks. The Applicant would be responsible in all cases for ensuring compliance with regulations and industry standards for grounding-related practices within and near the right-of-way, which would minimize the potential for such shocks.

Electric and Magnetic Field Exposure

Operation of the proposed gen-tie line could generate EMF. Public concerns exist regarding EMF and the possibility of deleterious health effects from living near high-voltage lines, as well as CRT computer monitor interference.

Available evidence as evaluated by the CPUC, CEC, and other regulatory agencies is that a significant health hazard to humans exposed to such fields has not been established (see, e.g., CPUC 2006). There are no health-based Federal regulations or industry codes specifying environmental limits on the strengths of fields from power lines. Most regulatory agencies believe that health-based limits are inappropriate at this time and the industry should continue its current practice of siting power lines to reduce exposure.

The gen-tie line would be situated in uninhabited, open desert land with no existing structures. The proposed gen-tie would traverse BLM-administered land, with the nearest residences more than 3,000 feet north. The general absence of residences in the immediate vicinity of the gen-tie line means that there would be no residential field exposure.

Although there is a potential for EMF to cause CRT computer monitor interference, the proposed gen-tie line would be situated on largely uninhabited desert land where computer monitor use is not common. Further, the liquid crystal display (LCD) technology used for portable computer monitors has replaced the CRT technology in most computer monitor applications. Moreover, recognition of computer monitor interference as a problem in the monitor industry has resulted in manufacturers who specialize in shielding enclosures and software programs that adjust the monitor’s vertical refresh rate. Therefore, there are not expected to be any impacts associated with CRT computer monitor interference.

Emergency Response

Construction, Operations, and Decommissioning

The Proposed Action site is located on undeveloped land in a rural area, and would be accessed by secondary roads. The Riverside County Operational Area Emergency Operations Plan (RCFD 2006) does not designate emergency evacuation routes. Therefore, the Proposed Action would not impair implementation of, or physically interfere with, an adopted emergency response or evacuation plan. Local roads are unlikely to be used as emergency routes because of the remote location of the Proposed Action site.

There would be two access routes to the Proposed Action area. Primary access for construction and operations would be from Exit 236 off of I-10, following State Route 78 and 16th Avenue/Seeley Avenue to the facility gate. An emergency access route would be from 22nd Avenue. The Applicant’s Hazardous Materials Management and Emergency Response Plan would comply with applicable Riverside County regulations, and would be coordinated with the Riverside County Fire Department.

Aircraft Operations

As discussed in Section 3.9.1.5, the Proposed Action would be located approximately 1.5 miles from the Blythe Airport. The 160-acre private land area subject to the Riverside County Conditional Use Permit is located outside of the Blythe Airport Influence Area (AIA). As shown in Figure 3.9-1, a portion of the BLM land is located within the AIA, within airport Compatibility Zone E. The relationship between the Proposed Action, Resource Avoidance Alternative, and Reduced Project Alternative to the airport is shown in Table 4.9-1.

Table 4.9-1. Relationship of Action Alternatives to Blythe Airport

	Alt. 1 - Proposed Action	Alt. 2 – Reduced Acreage	Alt. 3 – Reduced Project
Distance to Airport Boundary (miles)	1.59	1.51	1.62
Acreage of Overlap with Compatibility Zone E (acres)	424	287	34
Length of Gen-Tie Line within Compatibility Zone E (miles)	0	0.1	0.1

The compatibility criteria for projects within Compatibility Zone E are shown in Table 3.9-1. In Zone E, airspace review is required for structures on private land greater than 100 feet in height, but there are no other specific land use restrictions. Although a portion of the Proposed Action

area would be located within Zone E, the gen-tie line for the Proposed Action would be located outside of Zone E, and no portion of it would be located on private lands. Therefore, the Proposed Action would not involve structures on private land greater than 100 feet in height within Compatibility Zone E.

Section 1.5.3 of the RCALUCP lists major land use actions within an AIA which may require review by the ALUC. These actions include those which have the potential to create electrical or visual hazards to aircraft in flight, including electrical interference, lighting, glare, impaired visibility, and actions that have the potential to cause attraction of birds. The ALUC performed a review of consistency with the RCALUCP, and found on November 6, 2015, that the Project would be consistent with the RCALUCP.

Portions of a transmission line that are not in an AIA still could potentially be subject to Federal Aviation Administration (FAA) review through the Form 7460-1 process if within 20,000 feet (3.8 miles) of a runway, especially if located at a higher elevation than the runway. For projects that involve transmission line and poles which could affect navigable airspace, the FAA requires the Applicant to file Forms 7460-1, Notice of Proposed Construction or Alteration, and 7460-2, Notice of Actual Construction or Alteration. Following the Applicant's submittal of Form 7460-1 for the FAA's safety assessment at least 45 days prior to the start date of construction, the FAA would conduct a safety analysis to determine the effect of the proposed towers and transmission line on aircraft operations. The Proposed Action must receive a "Determination of No Hazard to Air Navigation" in order to proceed.

The FAA conducted a similar safety analysis for the adjacent BMSP, which would share the same gen-tie corridor as the DQSP. For that project, the FAA issued "No Hazard to Air Navigation" Determinations for the 230 kV gen-tie line structures. However, because the gen-tie line would be located within 20,000 feet of a runway, it still could potentially be subject to FAA review through the Form 7460-1 process. The height of the proposed gen-tie line towers for the DQSP has not been established, but they may be up to 135 feet in height. Therefore, it is unknown if the DQSP would receive a similar "No Hazard" determination, which would be required prior to construction of the Proposed Action. Mitigation Measure HAZ-3 requires that the Applicant receive a "Determination of No Hazard to Air Navigation" in order to proceed.

Construction

Construction of a portion of the Proposed Action would occur within the Blythe Airport Compatibility Zone E. Construction would include the use of cranes to install gen-tie support poles up to 135 feet in height along a length of 2.79 miles of transmission line outside of Zone E, but within 20,000 feet of a runway. During pole installation, the total height of the cranes would extend higher than the proposed towers. In such a situation, a separate notice to the FAA is required. The FAA would consider the proposed construction method, including use of cranes, in its safety assessment. With receipt of an FAA "Determination of No Hazards to Air Navigation," as required by Mitigation Measure HAZ-3, construction of the Proposed Action would not have an adverse effect on aircraft operations.

Operation and Maintenance

Within 5 days of completing construction within the Airport Compatibility Area, the Applicant would be required to submit Form 7460-2 notifying the FAA of completion of construction. With

prior receipt of a “No Hazard” determination, DQSP operation and maintenance would not have an adverse effect on aircraft operations.

Decommissioning

Decommissioning activities would be similar to construction activities, and would be considered as part of the safety assessment performed by the FAA. The Applicant may be required to submit Forms 7460-1 and 7460-2 to notify the FAA of any proposed alterations to the gen-tie line and support poles. With receipt of a “No Hazard” determination as required by Mitigation Measure HAZ-3, decommissioning would not have an adverse effect on aircraft operations.

Intentionally Destructive Acts

Construction

As discussed in Section 2.3.3.7, the Proposed Action area would be fenced, with security staffing at the facility entrance gate, throughout construction. The risk to workers or the public from intentionally destructive acts during construction would be low, as public access to the proposed construction and staging areas would be controlled by security and fencing.

Operation and Maintenance

None of the chemicals proposed for use or storage at the solar plant site are on the list of regulated substances in 40 CFR §68.130. Therefore, the DQSP facility would not be covered by the security standards for chemical facilities. The consequences of release of all the hazardous materials used at the facility (diesel fuel, mineral oil, and hydraulic fluid) would not cause a threat to the health and safety of the surrounding community due to the limited quantity and toxicity of the substances, and the large distance to the nearest receptors. As discussed in Section 2.3.3.7, the Proposed Action area would be fenced, with security staffing at the facility entrance gate, throughout operations.

The level of security needed for a particular power plant depends on the threat imposed, the likelihood of an adversarial attack, the likelihood of success in causing a catastrophic event, and the severity of consequences of that event. To determine an appropriate level of security for the nearby BSPP, the CEQA and NEPA lead agencies for that project used an internal vulnerability assessment decision matrix modeled after the U.S. Department of Justice Chemical Vulnerability Assessment Methodology, NERC guidelines, and U.S. Department of Homeland Security regulations to determine that the Proposed Action would fall into the “low vulnerability” category.

Given the similarities in location and the general type of proposed facility for the DQSP, and the site security measures proposed by the Applicant, the BLM has determined that the DQSP also would fall into the “low vulnerability” category. The Applicant’s security measures would minimize the potential for power disruptions or hazardous materials release caused by outside parties. The risk to workers or the public from damage to the DQSP as a result of intentionally destructive acts would be low because public access would be controlled by security and fencing. Once the Proposed Action is constructed, site security would be provided 24 hours per day, 7 days per week, through a combination of the fencing, lighting, security patrols, and remote monitoring by electronic security systems. Surveillance systems such as security cameras, motion detectors, or heat sensors may be installed along the site perimeter.

Decommissioning

The risk to workers or the public from intentional acts during decommissioning would be low, because public access to construction and staging areas would be controlled by security and fencing.

4.9.3.2 Alternative 2: Resource Avoidance Alternative

Environmental Site Contamination

Construction, Operations, and Decommissioning

The results of the Phase I ESA discussed in Section 4.9.3.1, including the identification of oil and lubricant containers on the private land parcel and the lack of locked caps on two nearby groundwater supply wells, also apply to Alternative 2. The Phase I Environmental Site Assessment conducted for the Project site in 2015 did not identify evidence of any releases of hazardous substances or petroleum products on the BLM portion of the Project site, or in the immediate vicinity, based on records searches and visual surveys. Hazardous substances, in the form of partially-filled oil and lubricant containers and other trash and debris, were observed on the private land parcel, which would be included within Alternative 2. Therefore, the potential for the presence of contaminated soil or groundwater is expected to be the same as the Proposed Action.

To establish baseline environmental conditions, Mitigation Measure HAZ-1 requires the Applicant to perform a Phase II Environmental Site Assessment (ESA) prior to beginning construction. The scope of the Phase II ESA would include groundwater sampling in the vicinity of the two uncapped onsite wells, followed by capping of the onsite wells, to establish baseline groundwater quality and protect against future releases. In addition, the Phase II ESA would include removal of oil and lubricant containers identified on the private land parcel in the Phase I ESA, sampling of soil to identify potentially contaminated areas, and removal of any identified contaminated soil.

Fugitive dust would be generated during construction, operation, and decommissioning of Alternative 2. Implementation of dust suppression measures in Mitigation Measures AQ-1 and AQ-2 would reduce the potential for worker exposure to any hazardous materials that may be present in site soils by reducing the amount of dust released. In addition, implementation of Mitigation Measure HAZ-1, which requires the Applicant to prepare and implement a site-specific Hazardous Materials Management and Emergency Response Plan, would minimize potential exposures to existing hazardous materials if such materials are found to be present on site.

Unexploded Ordnance

Construction, Operations, and Decommissioning

Because all of the land area associated with Alternative 2 is also included within the Proposed Action area, the potential for the presence of UXO is expected to be the same or lower than the Proposed Action.

Risk of Accidents and Spills of Hazardous Materials

Construction

Construction of Alternative 2 would present the same risk of accidents and spills as described for the Proposed Action. The types and volumes of hazardous materials and fuels, and the procedures and regulatory requirements for their management, would be the same as for the Proposed Action. The Preliminary Hazardous Materials Management and Emergency Response Plan, HMBP, SWPPP, and SPCC Plans described for the Proposed Action would also apply to Alternative 2. Mitigation Measure WATER-1 would require that all refueling and maintenance would occur at a designated area, within secondary containment with a volume sufficient to contain the largest fuel tank. In addition to the spill response and reporting requirements of the HMBP, SPCC, and SWPPP, Mitigation Measure WATER-1 would require the Applicant to notify BLM within 24 hours of any release outside of containment. Once construction has begun, Mitigation Measure HAZ-1 would require periodic sampling and analysis of groundwater to verify that Project construction does not release contamination.

Compliance with existing regulations would reduce hazards, but would not completely avoid hazards to construction workers, the public, and the environment. Because the solar array area would be smaller for Alternative 2 than for the Proposed Action, Alternative 2 would involve a smaller geographic area and shorter construction period than the Proposed Action. Consequently, the potential for impacts related to releases of hazardous materials associated with the construction of Alternative 2 would be lower than those of Proposed Action. In addition, the potential for onsite releases of hazardous materials to impact the public under Alternative 2 is lower than the Proposed Action because the northern boundary of the solar array field under Alternative 2 would be a further distance from the nearest residents.

Operation and Maintenance

Operation of Alternative 2 would present the same risk of accidents and spills as described for the Proposed Action. The types and volumes of hazardous materials and fuels, and the procedures and regulatory requirements for their management, would be the same as for the Proposed Action. The Preliminary Hazardous Materials Management and Emergency Response Plan, HMBP, SWPPP, and SPCC Plans described for the Proposed Action would also apply to Alternative 2. Mitigation Measure WATER-1 would require that all refueling and maintenance would occur at a designated area, within secondary containment with a volume sufficient to contain the largest fuel tank. In addition to the spill response and reporting requirements of the HMBP, SPCC, and SWPPP, Mitigation Measure WATER-1 would require the Applicant to notify BLM within 24 hours of any release outside of containment. Once construction has begun, Mitigation Measure HAZ-1 would require periodic sampling and analysis of groundwater to verify that Project construction does not release contamination.

As discussed in Section 2.5, the Resource Avoidance Alternative would use PV panels that contain a thin semiconductor layer containing CdTe. While CdTe itself is a hazardous substance in an isolated form, the CdTe in the PV panels is bound and sealed within the glass sheets and a laminate material (Fthenakis 2003, Fthenakis 2008). A report by the Norwegian Geotechnical Institute (NGI) notes that "If the modules are destroyed during use and are exposed to rain, emissions can occur; however, a very low vapour pressure and water solubility are expected to result in only trace emissions into the environment" (NGI 2010, p. 13). Additionally, an article that examined the

potential for CdTe leaching from commercial rooftop solar PV installations found the worst-case modeled environmental concentrations in soil, air, and groundwater in a California-based scenario, are one to five orders of magnitude below human health screening levels (Sinha et al. 2012). If the Applicant chooses to use CdTe PV panels or panels containing another potentially toxic semiconductor material, implementation of Mitigation Measure HAZ-2, which requires the Applicant to recycle or dispose of damaged or broken modules in an appropriately licensed landfill, would minimize the potential for semiconductor leaching from damaged panels and would be required for operations as for construction.

Similar to construction, compliance with existing regulations would reduce hazards, but would not completely avoid the potential for releases. During operations, Mitigation Measure HAZ-1 would require periodic site inspection, sampling, and analysis of groundwater and the leach field area to verify that Project operations do not release contamination. The potential for onsite releases of hazardous materials to impact the public under Alternative 2 is lower than the Proposed Action because the northern boundary of the solar array field under Alternative 2 would be a further distance from the nearest residents.

Decommissioning

Decommissioning of Alternative 2 would present the same risk of accidents and spills as described for the Proposed Action. Because the solar array area would be smaller for Alternative 2 than for the Proposed Action, Alternative 2 would involve a smaller geographic area and shorter decommissioning period than the Proposed Action. Consequently, the potential for impacts related to releases of hazardous materials associated with the decommissioning of Alternative 2 would be lower than those of Proposed Action. The Preliminary Hazardous Materials Management and Emergency Response Plan, HMBP, SWPPP, and SPCC Plans described for the Proposed Action would also apply to Alternative 2. In addition, the Applicant's Decommissioning and Site Restoration Plan would also apply to Alternative 2.

As with construction and operations, compliance with existing laws and regulations would reduce, but not completely avoid potential impacts related to the routine use, storage, transportation, and disposal of hazardous materials associated with decommissioning. The site inspection, monitoring, and other requirements of Mitigation Measure WATER-1 would apply throughout decommissioning, to verify that decommissioning activities do not release contamination. The potential for onsite releases of hazardous materials to impact the public under Alternative 2 is lower than the Proposed Action because the northern boundary of the solar array field under Alternative 2 would be a further distance from the nearest residents.

Public Health

Construction, Operations, and Decommissioning

The impacts of Alternative 2 on public health would be the same as for the Proposed Action. Implementation of Mitigation Measure WATER-2, which requires a comprehensive drainage, stormwater, and sedimentation control plan, would reduce the potential for unintentional ponding of water onsite or downstream of the site. Implementation of Mitigation Measure AQ-1 would reduce fugitive dust during the construction phase of Alternative 2, which would reduce the risk to workers of contracting valley fever.

Transmission Line Safety and Nuisance

The gen-tie line under Alternative 2 would be longer than under the Proposed Action (3.94 miles in Alternative 2, as compared to 2.79 miles in the Proposed Action). The additional length and revised route would not result in the gen-tie line being any closer to residences. Therefore, there would be no impacts associated with Alternative 2.

Emergency Response

Construction, Operations, and Decommissioning

The impacts of Alternative 2 on emergency response capability would be the same as for the Proposed Action. The use of access roads for Alternative 2 would be the same, and the duration of peak construction and total number of truck trips may be reduced from that of the Proposed Action.

Aircraft Operations

Construction, Operations, and Decommissioning

As shown in Table 4.9-1, the distance between the Alternative 2 boundary and the airport property would be approximately the same as the Proposed Action. The acreage which overlaps Compatibility Zone E under Alternative 2 would be reduced to 287 acres, as compared to 424 acres under the Proposed Action. Because there are no open space or density restrictions in Zone E, this difference would not affect any impacts.

For structures on private land, ALUC review of projects for consistency with the ALUCP is required for all structures greater than 100 feet in height in Zone E. The ALUC conducted a similar consistency analysis for the adjacent BMSP, which would share the same gen-tie corridor as the DQSP. For that project, the ALUC found the project to be consistent with the RCALUCP. The height of the proposed gen-tie line towers for the DQSP would be 135 feet in height, similar to that of the BMSP gen-tie line. The RCALUC reviewed Alternative 2, and made a determination on May 9, 2019, that the alternative is consistent with the RCALUCP (Riverside County ALUC 2019).

Because the transmission line and poles could affect navigable airspace, the FAA requires the Applicant to file Forms 7460-1, Notice of Proposed Construction or Alteration, and 7460-2, Notice of Actual Construction or Alteration. Following the Applicant's submittal of Form 7460-1 for the FAA's safety assessment at least 45 days prior to the start date of construction, the FAA would conduct a safety analysis to determine the effect of the proposed towers and transmission line on aircraft operations. The FAA conducted a similar safety analysis for the adjacent BMSP, which would share the same gen-tie corridor as the DQSP. For that project, the FAA issued "No Hazard to Air Navigation" Determinations for the 230 kV gen-tie line structures. Mitigation Measure HAZ-3 requires that Alternative 2 must receive a similar "Determination of No Hazard to Air Navigation" in order to proceed.

Intentionally Destructive Acts

Construction, Operations, and Decommissioning

The potential for intentionally destructive acts associated with Alternative 2 would be the same as for the Proposed Action.

4.9.3.3 Alternative 3: Reduced Project Alternative

Environmental Site Contamination

Construction, Operations, and Decommissioning

The results of the Phase I ESA discussed in Section 4.9.3.1, including the identification of oil and lubricant containers on the private land parcel and the lack of locked caps on two nearby groundwater supply wells, also apply to Alternative 3. The Phase I Environmental Site Assessment conducted for the Project site in 2015 did not identify evidence of any releases of hazardous substances or petroleum products on the BLM portion of the Project site, or in the immediate vicinity, based on records searches and visual surveys. Hazardous substances, in the form of partially-filled oil and lubricant containers and other trash and debris, were observed on the private land parcel, which would be included within Alternative 3. Therefore, the potential for the presence of contaminated soil or groundwater is the same as the Proposed Action.

To establish baseline environmental conditions, Mitigation Measure HAZ-1 requires the Applicant to perform a Phase II Environmental Site Assessment (ESA) prior to beginning construction. The scope of the Phase II ESA would include groundwater sampling in the vicinity of the two uncapped onsite wells, followed by capping of the onsite wells, to establish baseline groundwater quality and protect against future releases. In addition, the Phase II ESA would include removal of oil and lubricant containers identified on the private land parcel in the Phase I ESA, sampling of soil to identify potentially contaminated areas, and removal of any identified contaminated soil.

Fugitive dust would be generated during construction, operation, and decommissioning of Alternative 3. Implementation of dust suppression measures in Mitigation Measures AQ-1 and AQ-2 would reduce the potential for worker exposure to any hazardous materials that may be present in site soils by reducing the amount of dust released. In addition, implementation of Mitigation Measure HAZ-1, which requires the Applicant to prepare and implement a site-specific Hazardous Materials Management and Emergency Response Plan, would minimize potential exposures to existing hazardous materials if such materials are found to be present on site.

Unexploded Ordnance

Construction, Operations, and Decommissioning

Because all of the land area associated with Alternative 3 is also included within the Proposed Action area, the potential for the presence of UXO is expected to be the same or lower than the Proposed Action.

Risk of Accidents and Spills of Hazardous Materials

Construction

Construction of Alternative 3 would present the same risk of accidents and spills as described for the Proposed Action. The types and volumes of hazardous materials and fuels, and the procedures and regulatory requirements for their management, would be the same as for the Proposed Action. The Preliminary Hazardous Materials Management and Emergency Response Plan, HMBP, SWPPP, and SPCC Plans described for the Proposed Action would also apply to Alternative 3. Mitigation Measure WATER-1 would require that all refueling and maintenance would occur at a designated area, within secondary containment with a volume sufficient to contain the largest fuel tank. In addition to the spill response and reporting requirements of the HMBP, SPCC, and SWPPP, Mitigation Measure WATER-1 would require the Applicant to notify BLM within 24 hours of any release outside of containment. Once construction has begun, Mitigation Measure HAZ-1 would require periodic sampling and analysis of groundwater to verify that Project construction does not release contamination.

Compliance with existing regulations would reduce hazards, but would not completely avoid hazards to construction workers, the public, and the environment. Because the solar array area would be smaller for Alternative 3 than for the Proposed Action, Alternative 3 would involve a smaller geographic area and shorter construction period than the Proposed Action. Consequently, the potential for impacts related to releases of hazardous materials associated with the construction of Alternative 3 would be lower than those of Proposed Action. In addition, the potential for onsite releases of hazardous materials to impact the public under Alternative 3 is lower than the Proposed Action because the northern boundary of the solar array field under Alternative 3 would be a further distance from the nearest residents.

Operation and Maintenance

Operation of Alternative 3 would present the same risk of accidents and spills as described for the Proposed Action. The types and volumes of hazardous materials and fuels, and the procedures and regulatory requirements for their management, would be the same as for the Proposed Action. The Preliminary Hazardous Materials Management and Emergency Response Plan, HMBP, SWPPP, and SPCC Plans described for the Proposed Action would also apply to Alternative 2. Mitigation Measure WATER-1 would require that all refueling and maintenance would occur at a designated area, within secondary containment with a volume sufficient to contain the largest fuel tank. In addition to the spill response and reporting requirements of the HMBP, SPCC, and SWPPP, Mitigation Measure WATER-1 would require the Applicant to notify BLM within 24 hours of any release outside of containment. Once construction has begun, Mitigation Measure HAZ-1 would require periodic sampling and analysis of groundwater to verify that Project construction does not release contamination.

Similar to Alternative 2, Alternative 3 would use PV panels that contain a thin semiconductor layer containing CdTe. If the Applicant chooses to use CdTe PV panels or panels containing another potentially toxic semiconductor material, implementation of Mitigation Measure HAZ-2, which requires the Applicant to recycle or dispose of damaged or broken modules in an appropriately licensed landfill, would minimize the potential for semiconductor leaching from damaged panels and would be required for operations as for construction.

Similar to construction, compliance with existing regulations would reduce hazards, but would not completely avoid the potential for releases. During operations, Mitigation Measure HAZ-1 would require periodic site inspection, sampling, and analysis of groundwater and the leach field area to verify that Project operations do not release contamination. The potential for onsite releases of hazardous materials to impact the public under Alternative 3 is lower than the Proposed Action because the northern boundary of the solar array field under Alternative 3 would be a further distance from the nearest residents.

Decommissioning

Decommissioning of Alternative 3 would present the same risk of accidents and spills as described for the Proposed Action. Because the solar array area would be smaller for Alternative 3 than for the Proposed Action, Alternative 3 would involve a smaller geographic area and shorter decommissioning period than the Proposed Action. Consequently, the potential for impacts related to releases of hazardous materials associated with the decommissioning of Alternative 3 would be lower than those of Proposed Action. The Preliminary Hazardous Materials Management and Emergency Response Plan, HMBP, SWPPP, and SPCC Plans described for the Proposed Action would also apply to Alternative 3. In addition, the Applicant's Decommissioning and Site Restoration Plan would also apply to Alternative 3.

As with construction and operations, compliance with existing laws and regulations would reduce, but not completely avoid potential impacts related to the routine use, storage, transportation, and disposal of hazardous materials associated with decommissioning. The site inspection, monitoring, and other requirements of Mitigation Measure WATER-1 would apply throughout decommissioning, to verify that decommissioning activities do not release contamination. The potential for onsite releases of hazardous materials to impact the public under Alternative 3 is lower than the Proposed Action because the northern boundary of the solar array field under Alternative 3 would be a further distance from the nearest residents.

Public Health

Construction, Operations, and Decommissioning

The impacts of Alternative 3 on public health would be the same as for the Proposed Action. Implementation of Mitigation Measure WATER-2, which requires a comprehensive drainage, stormwater, and sedimentation control plan, would reduce the potential for unintentional ponding of water onsite or downstream of the site. Implementation of Mitigation Measure AQ-1 would reduce fugitive dust during the construction phase of Alternative 3, which would reduce the risk to workers of contracting valley fever.

Transmission Line Safety and Nuisance

The gen-tie line under Alternative 2 would be longer than under the Proposed Action (3.94 miles in Alternative 3, as compared to 2.79 miles in the Proposed Action). The additional length and revised route would not result in the gen-tie line being any closer to residences. Therefore, there would be no impacts associated with Alternative 3.

Emergency Response

Construction, Operations, and Decommissioning

The impacts of Alternative 3 on emergency response capability would be the same as for the Proposed Action. The use of access roads for Alternative 3 would be the same, and the duration of peak construction and total number of truck trips may be reduced from that of the Proposed Action.

Aircraft Operations

Construction, Operations, and Decommissioning

As shown in Table 4.9-1, the distance between the Alternative 3 boundary and the airport property would be 1.92 miles, as compared to approximately 1.6 miles under the Proposed Action and Alternative 2. The acreage which overlaps Compatibility Zone E under Alternative 3 would be reduced to 34 acres, as compared to 424 acres under the Proposed Action. Because there are no open space or density restrictions in Zone E, this difference would not affect any impacts.

For structures on private land, ALUC review of projects for consistency with the ALUCP is required for all structures greater than 100 feet in height in Zone E. The ALUC conducted a similar consistency analysis for the adjacent BMSP, which would share the same gen-tie corridor as the DQSP. For that project, the ALUC found the project to be consistent with the RCALUCP. The height of the proposed gen-tie line towers for the DQSP would be 135 feet in height, similar to that of the BMSP gen-tie line. The RCALUC reviewed Alternative 3, and made a determination on May 9, 2019, that the alternative is consistent with the RCALUCP.

Because the transmission line and poles could affect navigable airspace, the FAA requires the Applicant to file Forms 7460-1, Notice of Proposed Construction or Alteration, and 7460-2, Notice of Actual Construction or Alteration. Following the Applicant's submittal of Form 7460-1 for the FAA's safety assessment at least 45 days prior to the start date of construction, the FAA would conduct a safety analysis to determine the effect of the proposed towers and transmission line on aircraft operations. The FAA conducted a similar safety analysis for the adjacent BMSP, which would share the same gen-tie corridor as the DQSP. For that project, the FAA issued "No Hazard to Air Navigation" Determinations for the 230 kV gen-tie line structures. Mitigation Measure HAZ-3 requires that Alternative 3 must receive a similar "Determination of No Hazard to Air Navigation" in order to proceed.

Intentionally Destructive Acts

Construction, Operations, and Decommissioning

The potential for intentionally destructive acts associated with Alternative 3 would be the same as for the Proposed Action.

4.9.4 Application of CEQA Significance Thresholds

HAZ-1) Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

As discussed in Section 4.9.2, the Applicant has developed preliminary management plans related to the routine transport, use, and disposal of hazardous materials. There would be no routine emissions of hazardous materials from the facility under Alternatives 1, 2, or 3. Specifications and procedures for storage, use, transport, and disposal of hazardous materials and waste would be defined in the Hazardous Materials Management and Emergency Response Plan, HMBP, SWPPP, and SPCC Plans. The Hazardous Materials Management and Emergency Response Plan would define specific hazardous materials, as well as estimated volumes. The HMBP would include an inventory of hazardous materials, site map and building floor plans, training information, a description of hazardous materials handling and segregation, and plans for monitoring. The SWPPP would define procedures for managing and disposing of wastes in accordance with applicable regulations, and would also define storage locations and fueling procedures to protect water resources. The SPCC Plan would address the storage of oil or oil products, and would include a diagram showing the facility and locations of oil storage, description of the type of oil, methods used to prevent and control releases, and requirements for inspections, testing, employee training, and reporting. Limited pesticide use to control noxious weeds would occur, in accordance with a BLM-approved Integrated Weed Management Plan (IWMP). Pesticide use, if needed, would be limited to non-persistent, immobile pesticides applied only in accordance with manufacturer directions and all regulations for pesticide use. Any pesticide applications would be conducted within the framework of BLM and Department of Interior policies.

The only routine waste discharge would be associated with sanitary wastes disposed in the septic system. Mitigation Measure HAZ-1 would require periodic site inspection, sampling, and analysis of groundwater and the leach field area to verify that routine Project activities do not release contamination.

With implementation of Mitigation Measures HAZ-1, HAZ-2, and WATER-1, impacts regarding the routine transport, use, and handling of hazardous materials during construction, operation, and decommissioning of Alternatives 1, 2, or 3 would be reduced to less than significant levels.

HAZ-2) Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As discussed in Section 4.9.2, the Applicant has developed preliminary management plans related to the transport, use, and disposal of hazardous materials. The purpose of these procedures is to minimize the potential for upset and accident conditions to occur. In addition, these plans define procedures to be used to respond to accidental releases of hazardous materials into the environment. The HMBP would define an emergency response plan, include requirements for monitoring hazardous materials storage locations to ensure that any accidental release are identified and addressed in a timely manner. The SPCC Plan would address the methods used to prevent and control releases, and methods to be used to clean-up and dispose of recovered materials.

Implementation of Mitigation Measure HAZ-1 would be required under Alternatives 1, 2, or 3. Mitigation Measure HAZ-1 requires the Applicant to prepare and implement a site-specific Hazardous Materials Management and Emergency Response Plan, which would minimize potential exposures to existing hazardous materials if such materials are found to be present on site. If the Applicant chooses to use CdTe PV panels or panels containing another potentially toxic semiconductor material, implementation of Mitigation Measure HAZ-2, which requires the Applicant to recycle or dispose of damaged or broken modules in an appropriately licensed landfill, would minimize the potential for semiconductor leaching from damaged panels.

Compliance with existing regulations would reduce the potential for releases, but would not completely avoid hazards to construction workers, the public, and the environment. Although the Applicant proposes to refuel construction equipment at least 100 feet from any water body, water well or wetland, soil and groundwater contamination could still result from releases from fuel tanks on mobile fuel trucks or equipment, or as a result of the refueling process. Mitigation Measure WATER-1 would require that all refueling and maintenance would occur at a designated area, within secondary containment with a volume sufficient to contain the largest fuel tank. In addition to the spill response and reporting requirements of the HMBP, SPCC, and SWPPP, Mitigation Measure WATER-1 would require the Applicant to notify BLM within 24 hours of any release outside of containment. Mitigation Measure HAZ-1 would require periodic sampling and analysis of groundwater to verify that Project construction, operations, and decommissioning do not release contamination.

Because of the relatively low volumes of hazardous materials and fuels onsite at any time, requirements for immediate response to releases, and flat topography that limits site runoff, it is unlikely that any accidental releases would extend beyond the boundaries of the Project area before they are identified and addressed. The closest residence (apparent occupied mobile home trailer) is located approximately 3,700 feet north of the northeast corner of the Proposed Action boundary. The next two closest sensitive air quality receptors are located in the residential community of Nicholls Warm Springs/Mesa Verde approximately 4,800 feet north of the northeast corner of the Proposed Action boundary. Although members of the public could potentially be present outside the Proposed Action area fence, there are no adjacent land uses or local residents which would result in the presence of large number of people who could be impacted by a release of hazardous materials.

With implementation of Mitigation Measures HAZ-1, HAZ-2, and WATER-1, impacts associated with the accidental release of hazardous materials during construction, operation, and decommissioning of Alternatives 1, 2, or 3 would be reduced to less than significant levels.

HAZ-3) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Alternatives 1, 2, or 3 would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impacts would occur.

HAZ-4) Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

The Applicant's Phase I Environmental Site Assessment included a search for environmentally affected sites and other sites that are within a one-mile radius surrounding the proposed Project area, which includes the sites for Alternatives 2 and 3. The report (URS 2015) includes descriptions of each agency database, site names and addresses, and status, with some repetition existing among the different databases. There were no hazardous sites identified within the Project site, nor within the one-mile search radius of the Project site. Therefore, there would be no impact.

HAZ-5) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the project area?

Construction of a portion of the proposed Project would occur within the Blythe Airport Compatibility Zone E. Construction of the proposed Project would include the use of cranes to install gen-tie support poles up to 135 feet in height along a length of 2.79 miles of transmission line outside of Zone E, but within 20,000 feet of a runway. Construction of a portion of Alternatives 2 and 3 would occur within the Blythe Airport Compatibility Zone E, including a segment of the gen-tie line 0.1 miles long. Construction of Alternatives 2 and 3 would include the use of cranes to install gen-tie support poles up to 135 feet in height along a length of 3.84 miles of transmission line outside of Zone E, and 0.1 miles within Zone E.

During pole installation for Alternatives 1, 2, or 3, the total height of the cranes would extend higher than the proposed towers. In such a situation, a separate notice to the FAA is required. The FAA would consider the proposed construction method, including use of cranes, in its safety assessment. With implementation of Mitigation Measure HAZ-3, which requires that the Applicant receive a "Determination of No Hazard to Air Navigation" in order to proceed, impacts would be less than significant.

HAZ-6) For a project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the project area?

Alternatives 1, 2, or 3 would not be within the vicinity of a private airstrip; therefore, no impact would occur.

HAZ-7) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Alternatives 1, 2, or 3 would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; therefore, no impact would occur.

HAZ-8) Would the Project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Alternatives 1, 2, or 3 would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires; therefore, no impact would occur.

HAZ-9) Would the Project result in an inconsistency with an Airport Master Plan?

The RCALUC reviewed the Project, and made a determination on November 6, 2015 that the Project is consistent with the RCALUCP. Impacts would be less than significant.

The RCALUC reviewed Alternative 2 and Alternative 3, and made a determination on October 21, 2016 that both are consistent with the RCALUCP. Impacts would be less than significant.

HAZ-10) Would the Project require review by the Airport Land Use Commission?

The RCALUC reviewed the Project, and made a determination on November 6, 2015, that the Project is consistent with the RCALUCP. Impacts would be less than significant.

The RCALUC reviewed Alternative 2 and Alternative 3, and made a determination on October 21, 2016 that both are consistent with the RCALUCP. Impacts would be less than significant.

4.9.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.9 would be maintained. No hazardous materials would be brought to the Project area, no disturbance of site soils would occur, and no gen-tie line would be constructed, and therefore Alternative 4 would not result in any impacts associated with hazards or hazardous materials.

4.9.6 Cumulative Impacts

The geographic scope considered for cumulative impacts associated with hazardous materials, emergency response, environmental site contamination, and public health is the area within a one mile of the boundary of the Project. One mile is the standard search distance for hazardous materials in a Phase I Environmental Site Assessment, and also includes all areas within which a receptor might be expected to experience impacts from a release of hazardous materials from the Project. The geographic scope for cumulative effects related to aviation safety is the Blythe Airport Influence Area. The temporal scope of hazardous materials and aviation safety impacts would occur throughout the life of the Project, but would cease following Project decommissioning. Although transmission lines could accommodate power from other nearby electricity generation projects following decommissioning, such use is speculative, and not associated with any reasonably foreseeable future project.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

As discussed in Section 4.9.3.1, the potential for the Proposed Action to release hazardous materials which would present a risk to workers or the public is low. The APMs discussed in Section 4.9.2, including implementation of the Preliminary Hazardous Materials Management and Emergency Response Plan, HMBP, SWPPP, and SPCC Plans, and Mitigation Measures HAZ-1

and HAZ-2, would minimize the potential for a release of hazardous materials. The only past, present, and reasonably foreseeable future projects within one mile include the RE Crimson Solar Project, NRG Blythe PV Project, BMSP, and transmission lines within the corridors along the southwestern and northern boundaries of the Proposed Action area. These projects would each require an Environmental Site Assessment to identify site conditions before construction begins, and would each be subject to same agency regulations that address the handling and accidental release of hazardous materials. For the Proposed Action, implementation of Mitigation Measure WATER-2, which requires a comprehensive drainage, stormwater, and sedimentation control plan, would reduce the potential risk of mosquito breeding on or near the site, and therefore would reduce the risk for workers and the public of contracting vector-borne diseases. Similarly, implementation of Mitigation Measure AQ-1 would reduce fugitive dust during the construction phase, which would reduce the risk to workers of contracting valley fever. The past, present, and reasonably foreseeable future projects would be subject to similar agency regulations, APMs, and agency-required mitigation measures to reduce the potential for public health hazards. Therefore, each would also have a limited potential for releasing hazardous materials, and the contribution of the Project to cumulative impacts associated with hazardous materials would not be cumulatively considerable (impacts HAZ-1 through HAZ-4, and HAZ-8). None of the past, present, or reasonably foreseeable future projects within one mile are expected to have impacts to emergency response capabilities. During operations, transmission lines and solar power plant projects have limited numbers of workers and associated traffic. If there were overlapping construction periods for the DQSP, BMSP, RE Crimson Solar Project, and gen-tie lines for other projects, traffic levels could increase and potentially affect emergency response capability in limited local areas. However, concurrent construction of all of these projects is unlikely, given their different timeframes for environmental analysis and permitting. In addition, all of these projects are located in undeveloped, rural areas, and would not impact emergency response in populated areas at the Nichols Warm Springs/Mesa Verde community or in Blythe. Therefore, the incremental effects of the Proposed Action, when considered together with the effects of past, present, and reasonably foreseeable projects, would not create a cumulatively considerable impact to emergency response capability (impact HAZ-7).

Several of the current projects involve transmission lines constructed within the Blythe AIA. The Project would share Corridor K/30-52 with the gen-tie lines of other local solar projects, including the adjacent BMSP. Each individual power plant and transmission line must be evaluated by the FAA for its potential impact to air navigation. For the BMSP, the FAA has issued “No Hazard to Air Navigation” Determinations for the 230 kV gen-tie line structures. In general, multiple parallel transmission lines at the same height and distance from the airport would not be expected to create a cumulative risk to aircraft safety that is greater than the risk posed by an individual transmission line. However, the BMSP towers would be 85 to 125 feet high, while the height of the proposed gen-tie line towers for the DQSP may be up to 135 feet in height. Therefore, it is unknown if the DQSP would receive a similar “No Hazard” determination, which would be required prior to construction of the Proposed Action. Mitigation Measure HAZ-3 requires that the Applicant receive a “Determination of No Hazard to Air Navigation” in order to proceed. The FAA “Determination of No Hazard to Air Navigation” must address the “Cumulative impact resulting from the proposed construction or alteration of a structure when combined with the impact of other existing or proposed structures” (USDOT 2013). The issuance of this determination for the DQSP would signify that no adverse cumulative impact would result from the Proposed Action in combination with other projects within the Blythe Airport Compatibility Area. With this

determination required under Mitigation Measure HAZ-3, the Proposed Action would not incrementally contribute to any risk to aircraft safety (impacts HAZ-5, HAZ-6, HAZ-9, and HAZ-10).

With respect to intentionally destructive acts, potential cumulative impacts could occur if such acts on multiple facilities could release hazardous materials or result in power disruption. Individually, each of the past, present, and reasonably foreseeable future projects, including the DQSP, would contribute an incremental “low vulnerability” determination with respect to intentionally destructive acts, because each would have security measures in place and public access would be strictly controlled. Although possible, it seems unlikely that the targeting of multiple renewable energy facilities in the area could occur, and even less likely that it would result in a catastrophic event. Therefore, there is a low potential that the Proposed Action could combine with the individual threat levels of other past, present, or reasonably foreseeable future energy generation projects to create a cumulative impact.

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

As discussed in Section 4.9.3.2, the impacts of Alternative 2 with respect to hazardous materials and environmental site contamination, public health, emergency response, aircraft operations, and intentionally destructive acts are, in all cases, the same or slightly lower than that described for the Proposed Action. Alternative 2 would occupy a smaller land area, and would involve a reduced duration and level of effort required for construction and decommissioning. The regulatory requirements, APMs, and agency-imposed mitigation measures would be the same for Alternative 2 as for the Proposed Action. Therefore, the potential for Alternative 2 to contribute incrementally to cumulative impacts with respect to hazardous materials and environmental site contamination, public health, emergency response, and intentionally destructive acts would be approximately the same as those described for the Proposed Action.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

As discussed in Section 4.9.3.3, the impacts of Alternative 3 with respect to hazardous materials and environmental site contamination, public health, emergency response, aircraft operations, and intentionally destructive acts are, in all cases, the same or slightly lower than that described for the Proposed Action. Alternative 3 would occupy a smaller land area, and would involve a reduced duration and level of effort required for construction and decommissioning. The regulatory requirements, APMs, and agency-imposed mitigation measures would be the same for Alternative 3 as for the Proposed Action. Therefore, the potential for Alternative 3 to contribute incrementally to cumulative impacts with respect to hazardous materials and environmental site contamination, public health, emergency response, and intentionally destructive acts would be approximately the same as those described for the Proposed Action.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be

managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. Alternative 4 would not contribute to cumulative hazardous materials impacts.

4.9.7 Residual Impacts

Following implementation of Mitigation Measures HAZ-1, HAZ-2, HAZ-3, UXO-1, and TSLN-1, as well as AQ-1, AQ-2, and WATER-2, potential impacts related to hazards and hazardous materials would be avoided or substantially reduced. However, hazardous materials would always be present on the Project site, and although compliance with mitigation measures and existing regulations would reduce hazards, they would not completely avoid hazards to construction workers, the public, and the environment.

4.10 Lands, Realty, and Agricultural and Forestry Resources

4.10.1 Methodology for Analysis

4.10.1.1 NEPA Requirements

Evaluation of potential land use impacts of the Proposed Action and Alternatives is based on review of the BLM Master Title Plats and Land & Mineral Legacy Rehost 2000 System (LR2000) to obtain information related to pending and authorized uses on the lands potentially affected by the Project and its ancillary facilities.

The assessment is based on impacts from the Project on rights-of-way and land use permits for the Project site and adjacent BLM lands. Potential land use conflicts are identified and evaluated based on existing land uses, land uses proposed as part of the Proposed Action and Alternatives, Federal land use designations established in the CDCA Plan and its amendments, and BLM standards and policies related to land use. Land use compatibility is based on the intensity and patterns of adjacent land use to determine whether the Project would result in incompatible uses or nuisances. Potential land use conflicts may result from environmental effects, such as generation of noise, dust, or heavy truck traffic.

The analysis of CDCA Plan Consistency presented in Appendix F is based on review of the Multiple-Use Class (MUC) Guidelines provided in Table 1 of the CDCA Plan. As discussed in Section 3.10.1.3, the DRECP established new land use designations which replace the MUCs that are currently in effect under the CDCA Plan. In the DRECP, the Project site has been designated as a Development Focus Area (DFA), which is an area where activities associated with solar, wind, and geothermal energy are allowed, streamlined, and incentivized. Because the application is not subject to the terms of the DRECP, the multiple-use class designations of the CDCA Plan are still applicable. Another reason that the analysis of the Project in this PA/EIS/EIR is not based on the DRECP is that it is based on the land use designations and visual resource classifications that were in effect on March 6, 2015, the date of the NOI. DRECP's designations and classifications were not issued until 18 months later. Therefore, this analysis was prepared by reviewing the applicable CDCA Plan requirements and concepts (including multiple-use, sustained yield, and maintenance of environmental quality) for MUC-M land, and evaluating the Project to determine whether it would be consistent with them. A discussion of the differences between the CDCA Plan and the DRECP land use allocations, and their effect on the analysis of the Project in this PA/EIS/EIR, is presented in Appendix E.

Appendix B of the ROD for the Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States (BLM 2009) specifies IOPs to meet the Section 368 requirement to improve the ROW application process and to meet NEPA requirements to provide practicable means to avoid or minimize environmental harm which may result from future ROW grants within the designated corridors. The IOPs specify regulatory compliance, agency coordination, government-to-government consultation, project design, and resource-specific considerations that must be addressed through NEPA analysis of the proposed use of the corridor. The manner in which the Project and the PA/EIS/EIR conforms to the IOPs is presented in Appendix F, Table F-1.

The privately owned parcel under Riverside County jurisdiction is designated as Open Space-Rural in the Riverside County General Plan (Riverside County 2015a). The policies that are relevant to

the Project are presented within the discussion of each resource throughout Chapter 3. The conformance of the Project with these policies is evaluated in Appendix F, Table F-2.

4.10.1.2 CEQA Significance Criteria

The criteria listed below were used to determine if the proposed Project would result in impacts to land use. These criteria were obtained from the CEQA Environmental Checklist, Appendix G of the state CEQA Guidelines for Land Use and Planning. Under CEQA, the proposed Project and alternatives would have a significant impact on land use if they would:

LU-1) Physically divide an established community.

LU-2) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

LU-3) Conflict with any applicable habitat conservation plan or natural community conservation plan.

The following additional significance criteria from the County of Riverside CEQA Environmental Assessment form are used in the analysis. A project could have potentially significant impacts if it would:

LU-4) Result in a substantial alteration of the present or planned land use of an area.

LU-5) Affect land use within a city sphere of influence and/or within adjacent city or county boundaries.

LU-6) Be inconsistent with the site's existing or proposed zoning.

LU-7) Be incompatible with existing surrounding zoning.

LU-8) Disrupt or divide the physical arrangement of an established community (including a low income or minority community).

This section also evaluates impacts related to agricultural and forestry resources. These criteria were obtained from the CEQA Environmental Checklist, Appendix G of the state CEQA Guidelines for Agriculture and Forest Resources. Under CEQA, the proposed Project and alternatives would have a significant impact on agriculture or forestry resources if they would:

AG-1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the map prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

AG-2) Conflict with existing zoning for agricultural use, or a Williamson Act contract.

AG-3) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

AG-4) Result in the loss of forest land or conversion of forest land to non-forest use.

AG-5) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

The following additional significance criteria from the County of Riverside CEQA Environmental Assessment Form are also used in the analysis. A project could have potentially significant impacts if it would:

AG-6) Conflict with land within a Riverside County Agricultural Preserve.

AG-7) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625, “Right-to-Farm”).

4.10.2 Applicant-Proposed Measures

There are no APMs proposed to address potential effects to lands and realty.

4.10.3 Direct and Indirect Impacts

4.10.3.1 Alternative 1: Proposed Action

This impact assessment is based on known impacts from construction, operation, maintenance, and decommissioning on ROWs and land use permits of all types on BLM-administered land. Potential land use conflicts are identified and evaluated based on existing land uses, land uses proposed as part of the Proposed Action, Federal land use designations established in the CDCA Plan, and BLM land use-related standards and policies. Land use compatibility is based on the intensity and patterns of land use to determine whether the Proposed Action would result in incompatible uses or nuisances.

Occupation of Land Area

The acreage that would be occupied by the Proposed Action is presented in Table 2-4. The Proposed Action would occupy 3,616 acres of BLM public land, and 154 acres of private land. As the Project site is undeveloped, the only land use expected to be disrupted would be dispersed recreation and OHV use, which are discussed in Section 4.14, *Recreation and Public Access*. BLM would retain the right to issue other compatible ROWs within the boundary of the DQSP ROW. The Proposed Action would also temporarily occupy 61 acres of BLM public land for construction. Following construction, this land area would again become available for other land uses.

Impacts to Land Use Plans

The Applicant has requested a ROW grant (Application CACA-049397) from the BLM for approximately 5,115 acres of public land. The Proposed Action site is within the BLM’s California Desert District and within the planning boundaries of the CDCA Plan. As discussed in Section 2.2.3, the Final Western Solar Plan recognizes the DQSP as a “pending” ROW application (Western Solar Plan §9.4.22.2, p. 9.4-133). Pending applications like the DQSP are not subject to the Western Solar Plan (Western Solar Plan ROD Section B.1.2) or to the CDCA Plan amendments made in that decision. Therefore, if the BLM elects to approve the ROW grant application for the DQSP, a Project-specific CDCA Plan Amendment (PA) to identify the development footprint as suitable for the proposed type of solar energy use would be required. The CDCA Plan would also

need to be amended to authorize the portion of the gen-tie corridor which is located outside of BLM's Utility Corridor K and Section 368 Federal Energy Corridor 30-52.

An evaluation of the conformance of the Project with the specific elements of the CDCA Plan is presented in Appendix F. No changes in the MUC-M classification would be required prior to approving the ROW grant, and as discussed in the consistency analysis in Appendix F, the land use activities associated with the Proposed Action would be consistent with MUC Guidelines.

A portion of the Proposed Action would also be constructed on approximately 154 acres of private land under the land use authority of Riverside County. The compliance of the Project with the Riverside County General Plan (Riverside County 2015a), Palo Verde Valley Area Plan (Riverside County 2015b), and Riverside County Zoning Ordinance is discussed in Appendix F and Table F-2. With approval of the conditional use permit by the Riverside County Board of Supervisors, a solar power plant on a lot 10 acres or larger would be a permitted use on private land that is zoned W-2-10.

Impacts to Designated Corridors

As shown in Figure 3.10-2, the proposed ROW overlies portions of Utility Corridor J and Corridor K/30-52. Use of the land within either corridor for the gen-tie line, solar arrays, or for other uses could impact current uses of the corridors, as well as limit future uses of the corridors for other projects.

The gen-tie line for the Proposed Action would be sited almost entirely within utility Corridor K/30-52. As discussed in Appendix D, Section D.10.1, Appendix B of the Resource Management Plan Amendments/Record of Decision (ROD) for Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States (BLM 2009) specifies Interagency Operating Procedures (IOPs) to meet the Section 368 requirement to improve the ROW application process and to meet NEPA requirements to provide practicable means to avoid or minimize environmental harm which may result from future ROW grants within the designated corridors. An evaluation of the conformance of the Project with the IOPs is presented in Appendix F, Table F-1.

With respect to the use of the corridor by the gen-tie line, the majority of the line and the new access road would parallel other approved transmission lines already present or approved within the corridor. Only at the entrance to the CRSS would the gen-tie line need to cross other existing transmission lines. The Applicant has coordinated with the operators of other transmission lines in the corridor to minimize conflicts, and the Proposed Action gen-tie line would be collocated with other transmission lines to the extent feasible. The analysis of potential conflicts between the proposed gen-tie line and other utilities within the corridor is based on the information in Table 4.1-3. Among the reasonably foreseeable projects is the 10 West Link transmission line, which is proposed to be parallel to the southwestern boundary of the DQSP. However, the environmental analysis of that project includes alternative routes that follow Corridor J along the southeastern boundary of the project, and then pass east-west within Corridor K/30-52 along the northern boundary of the DQSP, in the same area as the proposed DQSP gen-tie line. Should one of these alternative routes be selected and approved, a conflict may exist between the Alternative 1 gen-tie line and the approved 10 West Link transmission line.

Project components would be consistent with the requirements of CPUC General Order No. 95 regarding the configurations of utility lines in shared ROWs. Construction and operation of these

new linear facilities using industry SOPs and BMPs for crossing over existing authorized uses would effectively mitigate potential negative impacts to existing authorized users. Although there are other ROWs currently authorized within Corridor K/30-52, several thousand feet of width would remain within the corridors to accommodate the gen-tie line, leaving sufficient space to accommodate anticipated near-future needs. However, the use of the energy transmission corridor by a gen-tie line would have an impact on siting of energy transmission within the corridor, for if constructed, the physical space occupied by the gen-tie would likely preclude siting of transmission in that same space.

In addition to the gen-tie line, underground, hard-wired fiber-optic cable would partially run perpendicular to Corridor K/30-52 to connect the site to existing communications cables, located approximately one mile to the north. With modern technology, impacts from the perpendicular cable and power lines would be expected to be minimal, easily mitigated and would not preclude continued and future use of either designated corridor. As noted above, future use would be slightly constrained by placement of additional facilities within the corridors.

Any existing authorization that would be affected by the Proposed Action has “priority rights” in the sense that any new authorization(s) would be issued “subject to” the previously granted rights of the existing ROW holders. Therefore, the Applicant would be required to mitigate any potential impact to the existing users at the Applicant’s expense. This would mean bearing all costs for relocating or modifying any facilities such as power poles or conductors that might be necessary to accommodate the new use. This priority right attaches when a ROW is granted; subsequent grants of ROW would be issued subject to the rights of prior grants. Here, if and after the proposed ROW is granted for the Proposed Action, subsequent applicants would have to mitigate any impact of their proposals to the Project.

As shown in Figure 3.10-2, the solar arrays associated with the Proposed Action would not conflict with any current uses within Corridors J or K/30-52. However, future uses within Corridor J could be impacted, because the Proposed Action solar arrays would overlies portions of the corridor. The width of Corridor J in this area is approximately 11,500 feet, and the solar arrays of the Proposed Action would occupy approximately 5,500 feet (48 percent) of this width.

As discussed in Section 2.2.3, the Proposed Action gen-tie line would be sited almost entirely within utility Corridor K/30-52. Because the CRSS is sited approximately 1,500 feet south of the southern boundary of Corridor K/30-52, the portion of the gen-tie corridor between the corridor and the CRSS would be located outside of the corridor, and would require consideration through the CDCA Plan Amendment process. Therefore, if the BLM elects to approve the ROW grant application for the Proposed Action, a Project-specific PA would be required.

4.10.3.2 Alternative 2: Resource Avoidance Alternative

In general, the types of land use impacts that would occur as a result of Alternative 2 are the same as those which would occur under the Proposed Action. The acreage that would be occupied by Alternative 2 is presented in Table 2-5. Alternative 2 would occupy 2,608 acres of BLM public land, and 160 acres of private land. Alternative 2 would also temporarily occupy 64.9 acres of BLM public land for construction. Following construction, this land area would again become available for other land uses. As with the Proposed Action, the only land use expected to be disrupted would be dispersed recreation and OHV use. BLM would retain the right to issue other compatible ROWs within the boundary of the DQSP ROW.

The relationship of the Alternative 2 site to applicable land use plans is the same as described for the Proposed Action. The entire BLM land area is classified as MUC-M, and a Project-specific PA to identify the development footprint as suitable for the proposed type of solar energy use would be required. The CDCA Plan would also need to be amended to authorize the portion of the gen-tie corridor which is located outside of BLM's Utility Corridor K and Section 368 Federal Energy Corridor 30-52. The use of the private land would be approximately the same under the Proposed Action and Alternative 2. With approval of the conditional use permit by the Riverside County Board of Supervisors, a solar power plant on a lot 10 acres or larger would be a permitted use on private land that is zoned W-2-10.

The ROW associated with Alternative 2 would overly portions of both Utility Corridor J and Corridor K/30-52, similar to the Proposed Action. As discussed in Section 4.10.3.1, a conflict may exist between the Alternative 1 gen-tie line and the 10 West Link transmission line if one of the alternative routes for 10 West is approved. To avoid this conflict, Alternative 2 includes a gen-tie route that differs from the gen-tie route in the Proposed Action. This route is partially outside of Corridor K/30-52, reducing the length of the gen-tie line within Corridor K/30-52 by approximately 50 percent. Instead of traversing directly north to Corridor K/30-52, as in the Proposed Action, the gen-tie line would traverse in a northwestward direction, reaching Corridor K/30-52 at the northwestern project boundary. From that corner, the gen-tie line would traverse north into the corridor, crossing under the 10 West Link line, and then would continue west within the corridor to the CRSS.

Project components would be consistent with the requirements of CPUC General Order No. 95 regarding the configurations of utility lines in shared ROWs. Construction and operation of these new linear facilities using industry SOPs and BMPs for crossing over existing authorized uses would effectively mitigate potential negative impacts to existing authorized users. Several thousand feet of width would remain within the corridors to accommodate the gen-tie line, leaving sufficient space to accommodate anticipated future needs.

As with the Proposed Action, the solar arrays associated with Alternative 2 could impact future uses within Corridor J, because they would overlie portions of the corridor. The width of Corridor J in this area is approximately 11,500 feet, and the solar arrays of Alternative 2 would occupy approximately 5,219 feet (45 percent) of this width.

The gen-tie line for Alternative 2 would include segments within utility Corridor K/30-52, as well as segments located outside of the corridor. Because the CRSS is sited approximately 1,500 feet south of the southern boundary of Corridor K/30-52, the portion of the gen-tie corridor between the corridor and the CRSS would be located outside of the corridor, and would require consideration through the CDCA Plan Amendment process. In addition, the segment of the gen-tie line extending northwest from the On-Site Substation to the northwestern corner of the project area would be located outside of the corridor. Therefore, if the BLM elects to approve the ROW grant application for Alternative 2, a Project-specific PA would be required.

4.10.3.3 Alternative 3: Reduced Project Alternative

In general, the types of land use impacts that would occur as a result of Alternative 3 are the same as those which would occur under the Proposed Action. The acreage that would be occupied by Alternative 3 is presented in Table 2-6. Alternative 3 would occupy 1,873 acres of BLM public land, and 160 acres of private land. Alternative 3 would also temporarily occupy 66.1 acres of

BLM public land for construction. Following construction, this land area would again become available for other land uses. As with the Proposed Action, the only land use expected to be disrupted would be dispersed recreation and OHV use. BLM would retain the right to issue other compatible ROWs within the boundary of the DQSP ROW.

The relationship of the Alternative 3 site to applicable land use plans is the same as described for the Proposed Action. The entire BLM land area is classified as MUC-M, and a Project-specific PA to identify the development footprint as suitable for the proposed type of solar energy use would be required. The CDCA Plan would also need to be amended to authorize the portion of the gen-tie corridor which is located outside of BLM's Utility Corridor K and Section 368 Federal Energy Corridor 30-52. The use of the private land would be approximately the same under the Proposed Action and Alternative 3. With approval of the conditional use permit by the Riverside County Board of Supervisors, a solar power plant on a lot 10 acres or larger would be a permitted use on private land that is zoned W-2-10.

The ROW associated with Alternative 3 would overly portions of both Utility Corridor J and Corridor K/30-52, similar to the Proposed Action. The route of the gen-tie line would be the same as in Alternative 2. Project components would be consistent with the requirements of CPUC General Order No. 95 regarding the configurations of utility lines in shared ROWs. Construction and operation of these new linear facilities using industry SOPs and BMPs for crossing over existing authorized uses would effectively mitigate potential negative impacts to existing authorized users. Several thousand feet of width would remain within the corridors to accommodate the gen-tie line, leaving sufficient space to accommodate anticipated future needs.

As with the Proposed Action, the solar arrays associated with Alternative 3 could impact future uses within Corridor J, because they would overlie portions of the corridor. The width of Corridor J in this area is approximately 11,500 feet, and the solar arrays of Alternative 3 would occupy approximately 5,219 feet (45 percent) of this width.

The gen-tie line for Alternative 3 would include segments within utility Corridor K/30-52, as well as segments located outside of the corridor. Because the CRSS is sited approximately 1,500 feet south of the southern boundary of Corridor K/30-52, the portion of the gen-tie corridor between the corridor and the CRSS would be located outside of the corridor, and would require consideration through the CDCA Plan Amendment process. In addition, the segment of the gen-tie line extending northwest from the On-Site Substation to the northwestern corner of the project area would be located outside of the corridor. Therefore, if the BLM elects to approve the ROW grant application for Alternative 3, a Project-specific PA would be required.

4.10.4 Application of CEQA Significance Thresholds

The proposed Project area does not include any designated farmlands or forest lands and therefore would not convert these uses to non-agricultural or non-forest land uses. The proposed Project would be consistent with current zoning and applicable land use plans. Therefore, impacts would be less than significant during construction, operation, maintenance, and decommissioning.

LU-1) Would the Project physically divide an established community?

Alternatives 1, 2, or 3 would not physically divide an established community. The Alternative 1, 2, and 3 areas would each be southwest of an existing community (Nicholls Warm Springs/Mesa

Verde) and no part of Alternatives 1, 2, or 3 would be located through an established community. No impacts would occur.

LU-2) Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The private land portion of Alternatives 1, 2, or 3 would be subject to the RCGP and PVVAP. The BLM portion of Alternatives 1, 2, or 3 would be subject to the CDCA Plan and its amendments. An evaluation of the conformance of the Project with the specific elements of the CDCA Plan is presented in Appendix F, and the compliance of the Project with the Riverside County General Plan (Riverside County 2015a), Palo Verde Valley Area Plan (Riverside County 2015b), and Riverside County Zoning Ordinance is discussed in Appendix F and Table F-2.

With approval of the conditional use permit by the Riverside County Board of Supervisors, a solar power plant on a lot 10 acres or larger would be a permitted use on private land that is zoned W-2-10.

The Alternative 1 gen-tie line would be sited almost entirely within BLM's Utility Corridor K/30-52. Under Alternatives 2 and 3, the western portion of the gen-tie line, as it approaches the CRSS, would also be sited within Corridor K/30-52. Because the CRSS is sited approximately 1,500 feet south of the southern boundary of Corridor K/30-52, the portion of the gen-tie corridor between Corridor K/30-52 and the CRSS under all three action alternatives would be located outside of the utility corridor, and would require consideration through the CDCA Plan Amendment process. In addition, under Alternatives 2 and 3, the segment of the gen-tie line extending northwest from the On-Site Substation to the northwestern corner of the project area would be located outside of the corridor, and would require consideration through the CDCA Plan Amendment process. The CDCA Plan would also be amended to identify the development footprint as suitable for the proposed type of solar energy use, and to close 6.8 miles of open routes that currently exist within the Project area. Impacts would be considered less than significant.

LU-3) Would the Project conflict with any applicable habitat conservation plan or natural community conservation plan?

As discussed in Sections 4.3, *Biological Resources - Vegetation* and 4.4, *Biological Resources - Wildlife*, Alternatives 1, 2, or 3 would not be within the jurisdiction of any adopted habitat conservation plan or natural community conservation plan; therefore, no impacts would occur.

LU-4) Would the Project result in a substantial alteration of the present or planned land use of an area?

Alternatives 1, 2, and 3 would be partially located on private lands that would be conditionally consistent (with approval of the conditional use permit) with the RCGP and the PVVAP. The gen-tie line and remaining solar facilities would be located on BLM-managed lands within the Riverside East SEZ and thus would be consistent with the CDCA Plan and NECO Plan Amendment to the CDCA Plan, though a land use plan amendment would be required for part of the gen-tie line (near the CRSS) because it would be located outside of Corridor K/30-52.

Alternatives 1, 2, and 3 would also require a CDCA Plan amendment to identify the development footprint as suitable for the proposed type of solar energy use, consistent with provisions already included in the CDCA Plan, and a Plan Amendment to close 6.8 miles of open routes that currently exist within the Project area. Therefore, Alternatives 1, 2, and 3 would be consistent with present or planned land use of the area; impacts would be less than significant.

LU-5) Would the Project affect land use within a city sphere of influence and/or within adjacent city or county boundaries?

Alternatives 1, 2, and 3 are located outside of the City of Blythe's boundary and outside the City of Blythe's Sphere of Influence. Therefore, no impacts would occur to land uses within Blythe or the City's sphere of influence.

LU-6) Would the Project be inconsistent with the site's existing or proposed zoning?

As described for LU-2, Alternatives 1, 2, and 3 would be conditionally consistent with the existing zoning designation (W-2-10) for the privately-owned 160 acre inholding within the Project area with the approval of the conditional use permit. The gen-tie line and solar facilities located on BLM lands would be consistent with the CDCA Plan and NECO Plan Amendment to the CDCA Plan as described in LU-4. Alternatives 1, 2, or 3 would not require a zone change or general plan amendment. Therefore, the proposed Project would be consistent with the site's existing zoning. No impacts would occur.

LU-7) Would the Project be incompatible with existing surrounding zoning?

The zoning surrounding the Alternatives 1, 2, and 3 areas is similar to that of those areas (private property is zoned W-2-10). Therefore, Alternatives 1, 2, and 3 would each be compatible with existing surrounding zoning. No impacts would occur.

LU-8) Would the Project disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

Alternatives 1, 2, or 3 would not be located through an established community (see LU-1). No impacts would occur.

AG-1) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the map prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

As stated in Section 3.10, there are no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance lands within the Alternative 1, 2, or 3 areas (California Department of Conservation 2014). The 160-acre private property inholding within the Project area was formerly used to grow jojoba, but is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. None of the BLM lands are identified as Prime, Unique, or Farmland of Statewide Importance. No impacts would occur.

AG-2) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

As stated in Section 3.10, there are no Williamson Act contracts on lands within or adjacent to the Alternative 1, 2, or 3 areas (California Department of Conservation 2012). The privately-owned inholding within the proposed Project area is currently zoned Controlled Development Areas (W-2-10) (10-acre minimum) (Riverside County 2015b). Within the zoning ordinance under e. Public Utilities Uses, (2) Structures and the pertinent facilities necessary and incidental to the development and transmission of electrical power and gas such as hydroelectric power plants, booster or conversion plants, transmission lines, pipe lines and the like are allowed within the W-2 zone with issuance of the conditional use permit. Therefore, Alternatives 1, 2, and 3 would not conflict with existing zoning or a Williamson Act contract. No impacts would occur.

AG-3) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

As described in Section 3.10, there are no forest lands, timberland or timberland zoned Timberland Production within the Alternative 1, 2, or 3 areas. Therefore no impacts would occur.

AG-4) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

As described in Section 3.10, there are no forest lands within the Alternative 1, 2, or 3 areas. Therefore no impacts would occur.

AG-5) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

As described in Section 3.10, there are no forest lands within the Alternative 1, 2, or 3 areas. Thus there would be no conversion of forest land to non-forest use. Though the 160-acre private property inholding was formerly used to grow jojoba, the property is not currently used for agriculture. Therefore, use of the property for Alternatives 1, 2, or 3 would not result in the conversion of farmland to non-agricultural use. No impacts would occur.

AG-6) Would the project conflict with land within a Riverside County Agricultural Preserve?

Alternatives 1, 2, and 3 are not located within a Riverside County Agricultural Preserve. Therefore no impacts would occur.

AG-7) Would the project cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625, "Right-to-Farm")?

Alternatives 1, 2, and 3 would be allowed as a conditional use on County lands zoned for Controlled Development Areas. As explained earlier, the proposed Project would not create use

conflicts with agricultural use or otherwise interfere with use of agricultural-zoned property adjacent to the Alternative 1, 2, or 3 areas. The impact would be less than significant.

4.10.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.10 would be maintained. Existing land uses would continue uninterrupted, and there would be no impact on future land uses. Therefore Alternative 4 would not result in any land use impacts.

4.10.6 Cumulative Impacts

The geographic scope of the cumulative effects analysis for lands and realty includes other MUC-M land in eastern Riverside County, the Project site and the location of ancillary facilities, adjacent land uses, and the designated utility corridors. Potential cumulative effects on lands and realty could occur during the Project's proposed 46-month construction period, 30-year projected lifespan, and decommissioning and closure period, as well as during the lifespan of other projects whose features may be located based on constraints imposed by implementation of the Project.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

Implementation of the Proposed Action and other past, present, and reasonably foreseeable future projects would potentially preclude the development of other uses on the Project site and could, thereby, affect the type of land use opportunities on lands within the CDCA Plan area.

The effects of past actions on MUC-M land are reflected in the discussion of each resource in Chapter 3. Effects of the Proposed Action on MUC-M lands relate to the opportunity cost of implementing the Project. If the Project or an alternative is developed on the site, the site cannot be used for other MUC-M use opportunities that otherwise would be available. Past, present, and reasonably foreseeable future actions making up the cumulative scenario are identified in Section 4.1.5. Among them, projects that also would be developed wholly or partially on lands designated as MUC-M would similarly restrict recreational opportunities within that classification for the duration of those projects. These projects include Palen Solar, Genesis Solar, Desert Sunlight, Desert Harvest, and RE Crimson. The Proposed Action would occupy approximately 3,616 acres, and the other MUC-M projects would occupy approximately 25,000 acres, for a total of approximately 28,600 acres. Of the total MUC-M lands in eastern Riverside County, the Proposed Action represents less than 1 percent, with a total cumulative effect of approximately 8 percent. Since more than 350,000 acres of MUC-M lands in eastern Riverside County would remain available for other uses; other classes of lands can also support some of the same uses MUC-M lands allow; and upon completion of decommissioning these lands would be available for other uses, no cumulative impact would result from the contribution of the Proposed Action to the impact of the past, present, and reasonably foreseeable future projects.

The Proposed Action would be one of three projects which propose transmission lines within Corridor K/30-52, connecting to the CRSS. The MSEP and BMSP would also have gen-tie lines within this corridor. The Applicant has coordinated with the operators of other transmission lines in the corridor to minimize conflicts, and the Proposed Action gen-tie line would be collocated with other transmission lines to the extent feasible. However, should one of the alternative routes for the 10 West Link transmission line be selected and approved, that line would also be located within corridor K/30-52, and the Alternative 1 gen-tie line may contribute to a cumulative conflict with the approved 10 West Link transmission line. Project components would be consistent with the requirements of CPUC General Order No. 95 regarding the configurations of utility lines in shared ROWs. Construction and operation of these new linear facilities using industry SOPs and BMPs for crossing over existing authorized uses would effectively mitigate potential negative impacts to existing authorized users.

The Project would not physically divide an established community (impact LU-1 and LU-8), and would not conflict with any applicable land use plan or habitat conservation plan (impact LU-2 and LU-3), so would not contribute to these cumulative impacts. Both the BLM and private land portions of the Project would be consistent with present or planned land use and zoning of the area, so would not contribute to cumulative impacts associated with land use (impact LU-4, LU-6, and LU-7). The Project is not located within a city sphere of influence and/or within adjacent city or county boundaries (impact LU-5). The Project would not contribute to the conversion of farmlands to a non-agricultural use (impact AG-1), and would not conflict with a Williamson Act contract (impact AG-2). The Project would not conflict with zoning for, or cause rezoning of, forest land (impact AG-3), and would not result in the loss of forest land or conversion of forest land to non-forest use (impact AG-4). The Project would not involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use; conflict with land within the Riverside County Agricultural Preserve; or cause development of non-agricultural uses within 300 feet of agriculturally zoned property (impacts AG-5, AG-6, and AG-7).

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The contribution of Alternative 2 to cumulative land use impacts would be approximately the same as the Proposed Action. Alternative 2 would occupy approximately 2,608 acres, and the other MUC-M projects would occupy approximately 25,000 acres, for a total of approximately 27,608 acres. Of the total MUC-M lands in eastern Riverside County, the Alternative 2 represents less than 1 percent, with a total cumulative effect of approximately 8 percent. Since more than 350,000 acres of MUC-M lands in eastern Riverside County would remain available for other uses; other classes of lands can also support some of the same uses MUC-M lands allow; and upon completion of decommissioning these lands would be available for other uses, no significant cumulative impact would result from the contribution of Alternative 2 to the impact of the past, present, and reasonably foreseeable future projects. Under Alternative 2, the eastern portion of the gen-tie line would be located outside of corridor K/30-52, and the gen-tie line would not contribute to a cumulative conflict with the 10 West transmission line.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The contribution of Alternative 3 to cumulative land use impacts would be approximately the same as the Proposed Action. Alternative 3 would occupy approximately 1,873 acres, and the other MUC-M projects would occupy approximately 25,000 acres, for a total of approximately 26,873 acres. Of the total MUC-M lands in eastern Riverside County, the Alternative 3 represents less than 1 percent, with a total cumulative effect of approximately 8 percent. Since more than 350,000 acres of MUC-M lands in eastern Riverside County would remain available for other uses; other classes of lands can also support some of the same uses MUC-M lands allow; and upon completion of decommissioning these lands would be available for other uses, no significant cumulative impact would result from the contribution of Alternative 3 to the impact of the past, present, and reasonably foreseeable future projects. Under Alternative 3, the eastern portion of the gen-tie line would be located outside of corridor K/30-52, and the gen-tie line would not contribute to a cumulative conflict with the 10 West transmission line.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. There would be no use of land area within MUC-M or designated utility corridors, and therefore no contribution to cumulative land use impacts.

4.10.7 Residual Impacts

Because no mitigation measures are recommended, impacts to lands and realty would be the same as discussed for the Proposed Action.

4.11 Mineral Resources

4.11.1 Methodology for Analysis

The impacts of the Project on mineral resources were assessed by evaluating whether the Project would reduce the availability of mineral resources, or interfere with access to mineral resources, region. Information on the type and extent of mineral resources present in the region was described in Section 3.11, *Mineral Resources*, using applicable geologic maps and mineral resource databases. Construction, operation, maintenance, and decommissioning activities for the Project are analyzed in terms of their direct and indirect effects on existing mineral leases and claims, and the future availability of or access to areas containing mineral resources.

4.11.1.1 CEQA Significance Criteria

The criteria used to determine the significance of potential impacts to mineral resources are based on Appendix G of the state CEQA Guidelines. The Project would result in a significant impact under CEQA related to mineral resources if it would:

MR-1) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

MR-2) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

The following additional significance criteria from the County of Riverside CEQA Environmental Assessment Form are used in the analysis. A project could have potentially significant impacts if it would:

MR-3) Be an incompatible land use located adjacent to a state classified or designated area or existing surface mine.

MR-4) Expose people or property to hazards from proposed, existing or abandoned quarries or mines.

4.11.2 Applicant-Proposed Measures

There are no APMs to address potential effects to mineral resources.

4.11.3 Direct and Indirect Impacts

4.11.3.1 Alternative 1: Proposed Action

Construction, Operations, and Decommissioning

As discussed in Section 3.11, *Mineral Resources*, the Project site is not currently used for mineral production, nor is it under claim, lease, or permit for the production of locatable, leasable, or salable minerals or mineral materials. In addition, the Riverside East SEZ was withdrawn from location and entry under the United States mining laws, subject to valid existing rights, for a period of 20 years, under Public Land Order No. 7818. The lands remain open to mineral and geothermal leasing, and mineral material sales.

During construction, operation, maintenance, and decommissioning of the Project, approximately 3,616 acres of land may be unavailable for mineral and geothermal leasing, and mineral material sales. This would not directly impact the current production of locatable or leasable minerals because none are known on the Project site. However, the Project site is underlain by sand and gravel, which potentially could represent a source of saleable minerals or mineral materials if there is a sufficient local demand for construction aggregate.

Indirect impacts could occur if the Project were to block access routes to any off-site mineral resource areas. As discussed in Section 4.14, *Recreation and Public Access*, and Section 4.17, *Transportation and Traffic*, the Project would not block or otherwise impair access to any major public roadway. While the Project would result in closing some open routes, other open routes in close proximity to the Project site could be used to access the same areas. The presence of the Project would not prevent permitted prospectors or owners of mineral leases in the surrounding region from accessing areas outside the footprint of the Project because there are other routes available to access the surrounding mountains.

4.11.3.2 Alternative 2: Resource Avoidance Alternative

Alternative 2 would cause the same types of impacts to mineral resources as the Proposed Action. Because the Project area would be smaller for Alternative 2 than for the Proposed Action, the construction, operation, maintenance, and decommissioning activities associated with Alternative 2 would affect and occupy a smaller area and, thereby, result in a reduced acreage removed from potential mineral production for the duration of the Project.

4.11.3.3 Alternative 3: Reduced Project Alternative

Alternative 3 would cause the same types of impacts to mineral resources as Alternatives 1 and 2. Because the Project area would be smaller for Alternative 3 than for either Alternatives 1 or 2, the construction, operation, maintenance, and decommissioning activities associated with Alternative 3 would affect and occupy a smaller area and, thereby, result in a reduced acreage removed from potential mineral production for the duration of the Project.

4.11.4 Application of CEQA Significance Thresholds

MR-1) Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The Alternative 1, 2, and 3 areas are designated as MRZ-4, an area where there is not enough information available to determine the presence or absence of mineral deposits. Therefore, these alternatives would not result in the loss of availability of a known mineral resource classified by the state, and there would be no impact.

MR-2) Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

The Alternative 1, 2, and 3 areas are not identified in the Riverside County General Plan or the Palo Verde Valley Area Plan as a locally important mineral resource recovery site. Therefore, the

loss of availability of a delineated locally important mineral resource recovery site would not occur. There would be no impact.

MR-3) Would the Project be an incompatible land use located adjacent to a state classified or designated area or existing surface mine?

Alternatives 1, 2, or 3 would not be located adjacent to, or prevent access to, a state designated area or existing surface mine. Therefore, these alternatives would not be an incompatible land use with a state-classified or designated area for mining operations. No impact would occur.

MR-4) Would the Project expose people or property to hazards from proposed, existing or abandoned quarries or mines?

The Alternative 1, 2, and 3 areas are not used for mineral production, nor are the areas under claim, lease, or permit for the production of locatable, leasable, or salable minerals or mineral materials. These alternatives would not expose people or property to hazards from proposed, existing, or abandoned quarries or mines. No impact would occur.

4.11.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.11 would be maintained. The Project area would remain available for applications to the BLM for solar development, mineral exploration, or other uses consistent with the CDCA Plan, and there would be no impacts to mineral resources.

4.11.6 Cumulative Impacts

The geographic scope of cumulative effects with respect to mineral resources includes all areas underlain by sand and gravel within eastern Riverside County. Past, present, and reasonably foreseeable future projects that occupy land area for non-mining uses, such as urban development or the construction of energy facilities, could combine to reduce the availability of, or access to, sand and gravel. Therefore, all of the projects listed in Tables 4.1-1 and 4.1-2 are considered within the geographic scope of analysis. The temporal scope of the analysis would include the duration of the Project through decommissioning. Following decommissioning, the Project area would again become available for development of mineral resources.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

In general, the cumulative projects are expected to have had a minor adverse impact on the availability of mineral resources, since sand and gravel is a widespread resource that underlies most of the desert basins in the region. If all of the projects in the cumulative scenario were to be implemented, the resulting loss of land could amount to as much as 316,675 acres, 225,000 of

which would be for the purpose of renewable energy development. The contribution of the Project to this total would be 3,616 acres, or about one percent of the total land area. There are approximately 1,544,000 acres of land underlain by Quaternary geologic units within eastern Riverside County. Even if all projects were implemented and were in operation at the same time, over 1,200,000 acres would remain available for aggregate resource exploration and production, and cumulative impacts associated with the availability of minerals (impact MR-1 and MR-2) would be less than significant.

The issues of compatibility of site use with adjacent mines or state designated mineral areas (impact MR-3) and exposure of people to hazards associated with mining (impact MR-4) are site-specific, and are unaffected by the presence of other projects in the cumulative scenario. Therefore, there are no cumulative impacts associated with these criteria.

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The contribution of Alternative 2 to the land area made unavailable for mineral development would be lower than that of the Proposed Action. Therefore, the contribution of Alternative 2 to cumulative impacts would be minimal.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The contribution of Alternative 3 to the land area made unavailable for mineral development would be lower than that of either Alternatives 1 or 2. Therefore, the contribution of Alternative 3 to cumulative impacts would be minimal.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, development of mineral resources, or other development. Alternative 4 would not contribute to cumulative impacts to mineral resources.

4.11.7 Residual Impacts

Once the Project is decommissioned, the land area would be made available for development of mineral resources, so there would be no residual effect from the Project.

4.12 Noise

4.12.1 Methodology for Analysis

This analysis evaluates potential noise impacts of the Proposed Action and Alternatives based on review of sensitive receptors, ambient noise levels, and projected noise levels that would be associated with construction, operation, maintenance, and decommissioning of the Project and alternatives. Impact discussions are based, in part, on the modeled noise levels of the Project as presented in the Noise Technical Report prepared by the Applicant (URS 2015; provided in Appendix R), and peer reviewed by BLM. The following methods were used to evaluate impacts.

Short-Term Construction and Decommissioning Noise Impacts and Criteria

Project construction noise was estimated by determining the contributing sound sources associated with each construction activity, and calculating the aggregate sound levels that propagate to a representative receptor location. Table 4.12-1 shows the nine construction activities which were evaluated, and how they are expected to overlap to result in aggregate noise levels. Three representative noise-sensitive receptors were selected based on the locations of residents and sensitive receptors, as shown in Figure 3.12-1, as well as the ambient noise measurements results presented in Table 3.12-1. Figure 3.12-1 shows that locations ST03, ST05, and Nearest Noise Sensitive Receptor (NNSR) are situated in the nearby Nicholls Warm Springs/Mesa Verde residential community. Location ST11 is located closer to the Project area, but is not a sensitive receptor location; thus locations ST03, ST05, and NNSR represent the nearest sensitive receptor locations. The ambient noise measurement results also show that locations ST03, ST05, and NNSR have the lowest ambient noise levels measured in the study area, probably because they are the most distant from Interstate 10.

Table 4.12-1. Construction Activity Breakdown for Noise Analysis (assumes 25 month construction schedule)

Activity ¹	Timeframe ²	Working Days	Max No. Workers ³	Activity Description
1	Dec. 2016 – Jan. 2017	42	60	Move On (grading of laydown, construction trailers, and parking areas)
2	Jan. 2017 – June 2018	378	80	Grading – site preparation/clearing/grading and balance of retention basins
3	Mar. 2017 – Aug. 2018	378	160	Construction – solar array structural components (posts, tilts, rails, trackers)
4	Apr. 2017 – Sept. 2018	378	80	Trenching – PCS excavation, PCS placement, underground cable trenching
5	May 2017 – Oct. 2018	378	310	Construction – solar module installation
6	Apr. 2018 – Sept. 2018	126	60	Construction – On-Site Substation
7	Apr. 2018 – Sept. 2018	126	60	Construction – Gen-Tie
8	Apr. 2018 – Sept. 2018	126	60	Construction – Operations and Maintenance Building
9	July 2018 – Dec. 2018	126	60	Construction – testing, cleanup, and restoration

Table 4.12-1. Construction Activity Breakdown for Noise Analysis (assumes 25 month construction schedule)

Activity ¹	Timeframe ²	Working Days	Max No. Workers ³	Activity Description
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Notes:

- 1 – The specific activities are defined in the Noise Technical Report prepared by the Applicant (URS 2015; provided in Appendix R)
- 2 - Exact dates are likely to vary. Timeframe is presented only to show how overlap of activities is used to calculate aggregate noise levels.
- 3 - Peak workforce estimated at 810 workers due to overlapping of construction activities. Workforce numbers may vary.

Noise impacts can occur under either of two separate conditions: (1) when noise from a project would exceed an absolute level that is set as a standard for the receiving land use; or (2) when noise from a project would increase existing ambient noise levels by some substantial degree. Since construction noise impacts are temporary, criteria based on long term land use impacts would not apply. However, construction would increase ambient levels during the construction period. While BLM has not established an agency-wide criteria for substantial noise increases, the Federal Highway Administration has compiled a report that indicates most state agencies consider an increase of 10-15 dBA (energy equivalent level, or Leq) to be “substantial” (FWHA 1995). This finding supports the 10 dBA increase criterion that Riverside County and BLM have used on similar, nearby projects such as the Blythe Mesa Solar Project (Riverside County 2014). While a 5 dBA increase would be “readily perceptible,” it would not be considered as substantial as an increase in noise level of 10 dBA, which is judged by most people as a doubling of the sound level (Riverside County 2017). Therefore, noise from onsite construction activity or offsite traffic noise would be considered an adverse impact if its acoustical contribution caused an increase above the baseline outdoor ambient sound level (Leq) by more than 10 dBA. For construction workers, the OSHA maximum time-weighted average noise exposure level of 90 dBA over an eight-hour work shift, regulated by Cal/OSHA, is considered to be an adverse noise impact.

Long-Term Operation and Maintenance Noise Impacts and Criteria

The Applicant used the Cadna/A® Noise Prediction Model (Version 4.5.147) to estimate the propagation of sound from aggregate Project operations, and thereby predict noise levels at various distances from the Project, including the representative noise- sensitive receptors selected for the ambient sound survey.

Impact criteria associated with aggregate noise from stationary sources would include the following daytime and nighttime sound levels from the Riverside County General Plan Noise Element and the County’s Noise Ordinance:

- From 7:00 a.m. to 10:00 p.m., 65 dBA Leq (10 minute); and
- From 10:00 p.m. to 7:00 a.m., 45 dBA Leq (10 minute).

Vibration Impacts

The general procedures for addressing vibration issues that are specified in the California Department of Transportation (CalTrans) Transportation and Construction Vibration Guidance

Manual were used to assess potential vibration impacts from the Project (Caltrans 2013). A peak particle velocity threshold identified by Caltrans is used in this analysis to determine the level of vibration impacts related to adverse human reaction and risk of architectural damage to normal buildings. The peak particle velocity threshold is 0.20 inches per second (in/sec) (Caltrans 2013). This peak particle velocity level has been found to be annoying to people in buildings and can pose a risk of architectural damage to buildings.

4.12.1.1 CEQA Significance Criteria

The criteria listed below were used to determine if the proposed Project would result in significant impacts from noise under CEQA. These criteria were obtained from the CEQA Environmental Checklist, Appendix G of the state CEQA Guidelines. Under CEQA, the proposed Project and alternatives would have a significant impact from noise if they would cause:

NOI-1) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

NOI-2) Substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

NOI-3) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

NOI-4) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the exposure of people residing or working in the project area to excessive noise levels.

NOI-5) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

NOI-6) For a project within the vicinity of a private airstrip, the exposure of people residing or working in the project area to excessive noise levels.

The following additional significance criterion from the County of Riverside Environmental Assessment form is used in the analysis. A project could potentially have significant impacts if it results in:

NOI-7) Impacts from railroad or highway noise.

CEQA does not set absolute noise level standards for receiving land uses (NOI-1) nor define what noise level increase would be considered substantial either temporarily (NOI-2) or permanently (NOI-5). In its Noise Ordinance, Riverside County has established absolute maximum levels (Lmax) allowed in various general plan land use designations (Riverside County 2007). This ordinance exempts construction activities from these requirements when the construction project is located a quarter mile or more from the nearest inhabited dwelling, which is the case for the DQSP. Neither the County's General Plan nor Municipal Code establish numeric maximum acceptable construction source noise levels at potentially affected receivers, or maximum temporary or periodic noise increases (Riverside County 2017). Therefore, the 10 dBA increase criteria noted above, which has been used by both BLM and Riverside County on previous similar projects, is used to assess impact significance for NOI-2.

Vibration-sensitive land uses such as high-precision manufacturing facilities or research facilities with optical and electron microscopes do not occur in the Project area. Therefore, a substantial impact resulting from excessive groundborne vibration would depend on whether a nuisance, annoyance, or physical damage to any structure could occur.

4.12.2 Applicant-Proposed Measures

In their Noise Technical report, the Applicant proposed a measure to orient their post installation equipment in a manner to reduce noise impacts at the locations of the nearest sensitive receptors. Based on noise measurements conducted during post driving operations at a similar facility, sound levels are approximately 7 dBA quieter at the back end of the equipment when compared to the front end. In order to reduce impacts at the NNSR, any Project locations within 6,560 feet (2 kilometers) of the NNSR would have the post installation equipment oriented with its back facing towards the northeast (towards the NNSR. At locations outside of a radial distance of 6,560 feet from the NNSR, orientation of the post installation equipment would not affect noise levels at the NNSR. The 6,560 foot radius is shown on Figure 4.12-1.

In their analysis of noise from construction-related traffic, the Applicant assumed that construction vehicles would be maintained according to manufacturers' instructions and recommendations, and would employ factory-approved exhaust mufflers. In addition, trucks hauling materials and equipment would comply with local ordinances and regulations with respect to travel speed and, if applicable, limitations on usage of compression-type braking.

To protect construction workers from equipment noise levels which exceed the maximum time-weighted average noise exposure level of 90 dBA over an eight-hour work shift, the Applicant proposes to instruct Project contractors to post warnings with respect to areas that may be noise level hazards, and to provide construction workers with OSHA approved hearing protection devices as part of an applicable hearing conservation program.

As discussed in Section 4.1.6, the impact analysis assumes that the APMs have been implemented, and these measures are therefore requirements for approval of the Project. The APMs are to be incorporated into the EICMPP/MMRCP, along with the agency-required mitigation measures.

4.12.3 Direct and Indirect Impacts

4.12.3.1 Alternative 1: Proposed Action

Construction

Onsite Construction

As shown in Table 4.12-2, during months 6 through 21 of Project construction, construction activities would cause aggregate construction noise levels at the NNSR to be 12 dBA higher than the measured baseline daytime outdoor ambient sound level. This situation would occur primarily due to the overlap of construction activity #3 and activity #5. Therefore, a temporary, but adverse impact would result in these months because the ambient sound level would increase more than 10 dBA. However, by orienting the post installation equipment as discussed in Section 4.12.2, the sound levels are approximately 7 dBA quieter at the back end of the equipment when compared to the front end, and therefore the aggregate construction noise level is expected to increase by less

than 10 dBA. Mitigation Measure NOISE-1 would require monitoring during construction to verify that the orientation of the post installation equipment has this effect.

For other construction months, and for the other two nearest noise sensitive receptors (ST03 and ST05), a less than 10 dBA change in daytime outdoor ambient sound levels would occur under down-wind conditions. Under upwind and calm meteorological conditions, a less than 10 dBA change in ambient noise levels would be expected during the day for all three noise sensitive receptor locations.

While construction activities are not expected to occur at night, some limited quantities of certain equipment such as generators (to provide lighting and HVAC for offices and security personnel on-site) are anticipated to operate through nighttime hours. Noise modeling shows that no ambient noise changes over 10 dBA are expected at any of the three nearest noise sensitive receptors under any of the modeled meteorological conditions.

Table 4.12-2. Predicted Daytime On-Site Project Construction Noise Per Activity at Nearest Noise Sensitive Receptor (NNSR)

Month	Construction Activity Noise (Estimated dBA per Indicated Activity) under Down-Wind Conditions									Aggr. (dBA)	Base (dBA)	Future (dBA)	Diff.
	1	2	3	4	5	6	7	8	9				
1	36									36	41	42	1
2	36	36								39	41	43	2
3		36								36	41	42	1
4		36	49							50	41	51	10
5		36	49	41		29				50	41	51	10
6 ¹		36	49	41	49	29				53	41	53	12
7 ¹		36	49	41	49	29				53	41	53	12
8 ¹		36	49	41	49	29				53	41	53	12
9 ¹		36	49	41	49	29				53	41	53	12
10 ¹		36	49	41	49	29				53	41	53	12
11 ¹		36	49	41	49	29				53	41	53	12
12 ¹		36	49	41	49	29				53	41	53	12
13 ¹		36	49	41	49	29				53	41	53	12
14 ¹		36	49	41	49	29				53	41	53	12
15 ¹		36	49	41	49	29				53	41	53	12
16 ¹		36	49	41	49	29				53	41	53	12
17 ¹		36	49	41	49	29	30	27		53	41	53	12
18 ¹		36	49	41	49	29	30	27		53	41	53	12
19 ¹		36	49	41	49	29	30	27		53	41	53	12
20 ¹			49	41	49	29	30	27	31	53	41	53	12
21 ¹			49	41	49	29	30	27	31	53	41	53	12
22				41	49	29	30	27	31	50	41	51	10
23					49				31	49	41	50	9
24									31	31	41	41	0
25									31	31	41	41	0

Table 4.12-2. Predicted Daytime On-Site Project Construction Noise Per Activity at Nearest Noise Sensitive Receptor (NNSR)

Month	Construction Activity Noise (Estimated dBA per Indicated Activity) under Down-Wind Conditions									Aggr. (dBA)	Base (dBA)	Future (dBA)	Diff.
	1	2	3	4	5	6	7	8	9				

Sources: US Department of Transportation 2006; URS 2015

Notes:

Aggr. = aggregate predicted noise level from all activities.

Base = measured baseline (i.e., existing outdoor ambient sound level).

Future = logarithmic sum of Aggr. and Base.

Diff. = arithmetic difference (in dBA) between Future and Base. A difference of > 10 dBA indicates a noise impact (value in **bold**).

1 - Noise levels presented for months 6 -21 include post driving machines and do not consider noise mitigation. Noise mitigation is expected to reduce the noise associated with activity 3 (installation of posts) from 49 to approximately 42 dBA, the aggregate for those months to below 51 dBA, and the Differential to below 10 dBA.

Construction Traffic

Construction would result in an increase in roadway traffic on State Route 78 and 16th Avenue/Seeley Avenue for personnel and deliveries of construction materials and equipment. Some of the representative noise sensitive receptors are located long those roads, near measurement locations ST09 and ST10 (see Figure 3.12-1). Although the noise from each individual vehicle would generally be the same as vehicles which currently travel on those roads, the number of these individual noise events would increase. The increase in peak hour traffic noise levels (Leq) associated with construction traffic are both calculated to be less than 10 dBA (2.85 and 7.34 dBA, respectively) at the State Route 78/16th Avenue/Seeley Avenue intersection. Therefore, the increase in traffic noise due to Project construction would be less than 10 dBA.

Construction Occupational Noise Exposure

Outdoor sound levels during construction may exceed the OSHA 90 dBA threshold near certain operating or idling powered mobile and stationary equipment. These noise levels would diminish with distance from the equipment, and would be limited to areas within the Project boundary. The Applicant proposes to mitigate the potential impact by requiring Project contractors to post warnings with respect to areas that may be noise level hazards, and to provide construction workers with OSHA approved hearing protection devices as part of an applicable hearing conservation program.

Construction Laydown, Staging and Parking Areas

As shown in Figure 2-2, the Project would include three construction laydown and parking areas. The area which is closest to the noise sensitive receptors is the one at the site entrance on the northern boundary of the facility. This is also the area which would be subject to the most noise generating activity, as it is the primary site entrance and staging area for equipment. Therefore an evaluation of noise sources at this location presents the most conservative analysis of noise associated with the temporary construction laydown areas.

The most prominent noise source for the construction laydown areas is the truck staging area, where trucks may idle with their engines running and equipment such as forklifts may be used to offload materials. The composite noise level associated with these items is estimated to be 79 dBA L_{max} at 50 feet. Because the NNSR is located approximately 4,800 feet away, the expected noise

level from the northern laydown/staging area would be no greater than 22 dBA, which is lower than the measured existing baseline level of 41 dBA at the NNSR.

Vibration

Temporary ground-borne vibration during construction could result from the operation of heavy construction equipment such as graders, bulldozers, and loaded haul trucks. These pieces of equipment can generate vibration levels of up to 0.09 in/sec at a distance of 25 feet (Caltrans 2013), but would attenuate within a short distance of the source. Because the NNSR is located approximately 4,800 feet away, there would be no expected vibration impacts.

Operation and Maintenance

Potential sources of long-term noise during operations include onsite operation and maintenance of the solar power plant equipment, traffic associated with operations, and gen-tie corona noise.

Onsite Operations

Noise sources for operations are expected to be much lower than those associated with construction. Operations are unlikely to involve use of post installation equipment, and would also involve much lower volumes of truck traffic. As shown in Table 4.12-3, Project operational noise levels at ST03, ST05, and the NNSR are expected to be lower than existing outdoor ambient sound levels. Operational noise levels would all be lower than 45 dBA L_{eq} (10-minute period), as required by the Riverside County Noise Element. Therefore, Project operational noise is not anticipated to cause an increase in ambient noise level of 10 dBA or more at the three nearest noise sensitive receptors.

Operational Traffic

Traffic to support Project operations involves only a small number of vehicles, resulting in only a minor increase in existing levels of roadway traffic. The noise impacts would be much lower than those associated with Project construction, and would not cause an increase in ambient noise level of 10 dBA or more at the three nearest noise sensitive receptors.

Gen-Tie Line Corona Noise

The term corona is used to describe the breakdown of air into charged particles caused by the electrical field at the surface of a conductor. Audible noise levels generated by corona discharge vary depending on weather conditions as well as the voltage and condition of the line. Wet weather conditions often increase corona discharge due to accumulation of raindrops, fog, frost, or condensation on the conductor surface, which causes surface irregularities thereby promoting corona discharge. Corona noise levels for a transmission line with similar voltage (220 kV) as the proposed 230 kV gen-tie line have been estimated to be approximately 30 dBA at the edge of the transmission line ROW during dry conditions (CPUC 2010). During adverse weather conditions such as fog or rain, which are rare in the study area, corona discharge could be up to 20 dBA higher than in dry conditions. Therefore, under worst-case conditions, corona noise could be as high as 50 dBA at the edge of the proposed gen-tie line ROW.

Table 4.12-3. Predicted Project Operational Noise Levels

Meteorological Condition	ST03				ST05				Nearest Noise Sensitive Receptor (NNSR)			
	PL (dBA)	BL (dBA)	Future (dBA)	Diff. (dBA)	PL (dBA)	BL (dBA)	Future (dBA)	Diff. (dBA)	PL (dBA)	BL (dBA)	Future (dBA)	Diff. (dBA)
Wind neutral ¹	29	39	39	0	28	40	40	0	31	41	41	0
Temperature inversion ²	33	39	40	1	32	40	41	1	35	41	42	1
9 mps wind from N ³	26	39	39	0	25	40	40	0	28	41	41	0
9 mps wind from S ⁴	33	39	40	1	32	40	41	1	35	41	42	1

Source: URS 2015

Notes:

1 - Calm meteorological conditions (winds less than 0.5 meters per second [mps] in any direction), CONCAWE Stability Class D.

2 - Calm meteorological conditions (no wind), CONCAWE Stability Class G.

3 - Winds are from the north, at 9 mps (29.5 feet per second [fps]), CONCAWE Stability Class D.

4 - Winds are from the south, at 9 mps (29.5 fps), CONCAWE Stability Class D.

ST03 = short-term (ST) baseline ambient sound level survey position "ST03."

ST05 = short-term (ST) baseline ambient sound level survey position "ST05."

NNSR = nearest noise sensitive receptor ("unknown structures" located between LT1 and ST11).

PL = predicted sound pressure level, dBA.

BL = measured baseline level (from daytime short-term measurement in field), dBA.

Future = logarithmic sum of PL and BL.

Diff. = arithmetic difference (in dBA) between Future and BL. A difference of > 10 dBA indicates a noise impact (value in **bold**).

The closest noise sensitive receptor along the proposed gen-tie line route is location ST11, at a distance of approximately two miles. Assuming a maximum noise level of 50 dBA at the edge of the ROW during wet weather conditions and accounting for how noise levels from line sources attenuate over soft surfaces, corona noise would attenuate to lower than measured background noise (41 dBA) over two miles. Therefore, corona noise levels that would be associated with the proposed gen-tie line would not conflict with USEPA noise guidelines for residences (i.e., 55 dBA L_{dn}).

Vibration

Operation and maintenance of the Project would not introduce any new sources of perceivable groundborne vibration to the study area. Consequently, the Project would cause no operation- or maintenance-related adverse effects associated with groundborne vibration. Because implementation of the Project would not result in exposure of persons to or generation of excessive groundborne vibration, it also would not expose them to or generate excessive ground-borne noise levels.

Decommissioning

At the end of the 30-year term of the BLM ROW grant, Project operation would cease and associated facilities would be decommissioned and dismantled, and the site would be restored. Decommissioning activities could generate temporary noise levels similar to those that would occur during construction of the Project, though slightly lower because post installation equipment would not be necessary. Therefore, it is unlikely that noise during decommissioning activities would increase ambient noise by more than 10 dBA.

4.12.3.2 Alternative 2: Resource Avoidance Alternative

Construction

The sources of noise and vibrations associated with Project construction would be the same under Alternative 2 as under the Proposed Action. The primary difference between Alternative 2 and the Proposed Action would be location of the noise and vibration sources. Under Alternative 2, the Project area would be reduced in size relative to that of the Proposed Action. Although the On-Site Substation, gen-tie line, site access roads and entrance, and temporary staging areas would be located further to the east than in the Proposed Action, they would be approximately the same distance from the sensitive receptors. However, the northern boundary of the solar arrays would be moved further to the south under Alternative 2. As discussed in Section 4.12.3.1, the primary source of noise associated with construction, and the only noise source which would contribute to an increase of more than 10 dBA in the ambient sound level, is the post installation equipment. The post installation equipment would be used only in the solar arrays, for installation of solar panels. Therefore, the most substantial noise source under Alternative 2 would be moved further from the location of the NNSR, and construction noise impacts to sensitive receptors would therefore be lower than under the Proposed Action.

All other noise and vibration sources associated with construction of Alternative 2, including construction traffic, occupational noise, and noise in the construction laydown areas, would be about the same, and in the same locations, as those for the Proposed Action. As discussed in

Section 4.12.3.1, none of these other noise sources are expected to result in an increase of more than 10 dBA in the ambient sound level at the NNSR.

Operation and Maintenance

The noise and vibration sources associated with Alternative 2 would be about the same, and in the same locations, as those associated with the Proposed Action. Any noise or vibration sources that would be directly associated with the solar array fields would be moved to the south, further away from any sensitive receptors. Therefore, the impact of these noise sources would be lower than those associated with the proposed Action. All other noise sources associated with Alternative 2 would be the same, and in the same location, as those for the Proposed Action. As discussed in Section 4.12.3.1, none of these other noise source is expected to result in an increase of more than 10 dBA in the ambient sound level at the NNSR.

Decommissioning

Decommissioning activities under Alternative 2 could generate temporary noise and vibration levels similar to those that would occur during construction of the Proposed Action, though noise from decommissioning activities would be slightly lower because post-installation equipment would not be necessary. In addition, noise sources associated with removal of the solar arrays would be moved further to the south, away from the sensitive noise receptors. Therefore, it is unlikely that noise during decommissioning activities would increase ambient noise by more than 10 dBA.

4.12.3.3 Alternative 3: Reduced Project Alternative

Construction

The sources of noise and vibrations associated with Project construction would be the same under Alternative 3 as under the Proposed Action. The primary difference between Alternative 3 and the Proposed Action would be location of the noise and vibration sources. Under Alternative 3, the Project area would be reduced in size relative to that of both Alternatives 1 and 2. Although the On-Site Substation, gen-tie line, site access roads and entrance, and temporary staging areas would be located further to the east under Alternative 3, they would be approximately the same distance from the sensitive receptors as in Alternatives 1 and 2. However, the northern boundary of the solar arrays would be moved further to the south under Alternative 3, and thus located further from the sensitive receptors than in Alternatives 1 and 2. As discussed in Section 4.12.3.1, the primary source of noise associated with construction, and the only noise source which would contribute to an increase of more than 10 dBA in the ambient sound level is the post installation equipment. The post installation equipment would be used only in the solar arrays, for installation of solar panels. Therefore, the most substantial noise source under Alternative 3 would be moved further from the location of the NNSR, and construction noise impacts to sensitive receptors would therefore be lower than under Alternatives 1 or 2.

All other noise and vibration sources associated with construction of Alternative 3, including construction traffic, occupational noise, and noise in the construction laydown areas, would be about the same, and in the same locations, as those for Alternatives 1 and 2. As discussed in

Section 4.12.3.1, none of these other noise source is expected to result in an increase of more than 10 dBA in the ambient sound level at the NNSR.

Operation and Maintenance

The noise and vibration sources associated with Alternative 3 would be about the same, and in the same locations, as those associated with the Proposed Action. Any noise or vibration sources that would be directly associated with the solar array fields would be moved to the south, further away from any sensitive receptors. Therefore, the impact of these noise sources would be lower than those associated with Alternatives 1 and 2. All other noise sources associated with Alternative 3 would be the same, and in the same location, as those for the Proposed Action As discussed in Section 4.12.3.1, none of these other noise source is expected to result in an increase of more than 10 dBA in the ambient sound level at the NNSR.

Decommissioning

Decommissioning activities under Alternative 3 could generate temporary noise and vibration levels similar to those that would occur during construction of Alternative 2, though noise from decommissioning activities would be slightly lower because post-installation equipment would not be necessary. In addition, noise sources associated with removal of the solar arrays would be moved further to the south, away from the sensitive noise receptors. Therefore, it is unlikely that noise during decommissioning activities would increase ambient noise by more than 10 dBA.

4.12.4 Application of CEQA Significance Thresholds

NOI-1) Would the Project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

The applicable noise ordinance is Riverside County Ordinance 847, which includes a daytime or nighttime noise limit of 45 dBA L_{max} as the maximum decibel level allowed in Rural Residential areas, but only if the distance between the Project site and the nearest inhabited dwelling is less than one quarter-mile. Alternatives 1, 2, and 3 are exempt from this ordinance because the NNSR is more than one quarter-mile away (approximately 4,800 feet) from the Project boundary. There would be no impact.

NOI-2) Would the Project result in substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Temporary or periodic increases in ambient noise levels would occur during construction, and the construction noise would be perceptible at the locations of the nearest residences. The construction noise impact to ambient noise levels would be intermittent, and would diminish with distance. The impact would be temporary, occurring only for the duration of construction, and would occur only in the daytime. However, the increase in noise levels would be sufficient to create annoyance. As shown in Table 4.12-2, concurrent construction activities (Activities 3 and 5) would cause aggregate construction noise levels at the NNSR to be 12 dBA higher than the measured baseline daytime outdoor ambient sound level. Therefore, a temporary significant impact would result in

Months 6 through 21. However, with implementation of the Applicant's proposed measure to orient post installation equipment away from the NNSR, this impact would be reduced to less than significant.

Under Alternatives 2 and 3, the post installation equipment would be operated further to the south, at a further distance from the sensitive receptors, than under Alternative 1 and would be subject to the same APM to be oriented away from the sensitive receptors. Therefore, the noise impacts associated with Alternatives 2 and 3 would be lower than those of Alternative 1. With implementation of the monitoring requirement of Mitigation Measure NOISE-1, the impact from Alternatives 2 and 3 would also be less than significant.

NOI-3) Would the Project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Temporary sources of groundborne vibration and noise during construction of Alternative 1, Alternative 2, or Alternative 3 would result from operation of conventional heavy construction equipment such as graders, bulldozers, and loaded haul trucks. These pieces of equipment can generate vibration levels of up to 0.09 in/sec at a distance of 25 feet (Caltrans 2013), but would attenuate within a short distance of the source. Because the NNSR is located approximately 4,800 feet away from the Project boundary under Alternative 1, 4,300 feet away from the Project boundary under Alternative 2, and 7,350 feet away from the Project boundary under Alternative 3, there would be no expected vibration impacts. Sources of vibration during operations and decommissioning of Alternatives 1, 2, or 3 would be lower than those for construction, and would also likely be located further away from the sensitive receptors. Therefore, vibration impacts from all phases of Alternatives 1, 2, and 3 would be less than significant.

NOI-4) Would the Project result in for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, where people residing or working in the project area would be exposed to excessive noise levels?

Alternatives 1 and 2 would be located approximately 1.5 miles from the Blythe Airport; Alternative 3 would be located approximately 1.7 miles from the Blythe Airport. Given this distance, noise from construction, operations and maintenance, and decommissioning would attenuate to below ambient noise levels at the airport. Therefore, noise impacts during construction, operation and decommissioning of these alternatives would be less than significant.

NOI-5) Would the Project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Alternatives 1, 2, and 3 would generate noise associated with the operation and maintenance of the Project, operational traffic, and gen-tie line corona discharge. Operational noise, operational traffic noise, and corona noise levels for these alternatives would not result in substantial changes to noise levels. As shown in Table 4.12-3, Project operational noise is expected to be quieter than existing outdoor ambient sound levels. The change in the traffic noise level due to operational traffic would be less than 3 dBA. Due to noise attenuation over 2 miles to the closest noise sensitive receptor, corona noise levels that would be associated with the proposed gen-tie line would not

exceed the Riverside County General Plan or Noise Ordinance limits for residences in the area (i.e., 45 dBA L_{dn}), and noise impacts during operations would be less than significant.

NOI-6) Would the Project within the vicinity of a private airstrip, result in people residing or working in the project area being exposed to excessive noise levels?

Alternatives 1, 2, and 3 are not located near a private airstrip. There would be no impacts under any of the alternatives.

NOI-7) Would the Project result in impacts from railroad or highway noise?

Alternatives 1, 2, or 3 would not utilize railroad service for delivery of materials or workers; therefore, no impacts related to railroad noise would occur. During construction of Alternative 1, workers commuting to the Project area and delivery of materials would result in a slight increase in traffic along State Route 78. The anticipated change in daily and afternoon peak hour traffic noise levels (L_{eq}) for Alternative 1 are both calculated to be less than 10 dBA (2.85 and 7.34 dBA, respectively) at the State Route 78/16th Avenue/Seeley Avenue intersection. Traffic to support Project operations involves only a small number of vehicles, resulting in only a minor increase in existing levels of roadway traffic. The noise impacts would be much lower than those associated with Project construction. The impacts of highway noise under Alternatives 2 or 3 would be about the same as those for Alternative 1. Therefore, the increase in highway noise due to Project construction and operation would be less than significant.

4.12.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.12 would be maintained. Noise and vibration levels in the vicinity of the Project site would not be expected to change noticeably from existing conditions.

4.12.6 Cumulative Impacts

Noise levels tend to diminish quickly with distance from a source; therefore, the geographic scope for cumulative impacts associated with noise would be limited to projects located within approximately one-half mile of the Project, including the gen-tie line. The temporal scope for cumulative impacts associated with noise would include the construction, operation, maintenance, and decommissioning phases of the Project. Once decommissioning is completed, there would be no residual noise impacts associated with the Project.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

The ambient noise levels reported in Section 3.12.1.2 represent the cumulative noise levels of all existing projects, and the analysis presented in Table 4.12-2 is a cumulative analysis of the

contribution of the Project construction to those cumulative noise levels. As shown in Table 4.12-2, noise sources associated with the Project construction would combine with other existing noise sources, and would result in an increase in ambient noise levels at the locations of ST03, ST05, and the NNSR. The increase would be temporary during construction, and would be mitigated by the Applicant's proposal to orient the post installation equipment away from the locations of the sensitive receptors. With mitigation, the contribution of the Project would not be cumulatively considerable (impact NOI-1 and NOI-2). As shown in Table 4.12-3, the contribution of Project operations to these ambient noise levels is expected to be minimal, so any contribution of the Project to cumulative noise impacts would be temporary (impact NOI-5).

The only past, present, and reasonably foreseeable future projects within one-half mile include the RE Crimson Solar Project, NRG Blythe PV Project, BMSP, and transmission lines within the corridors along the southwestern and northern boundaries of the Project area. If there were overlapping construction periods for the DQSP, BMSP, RE Crimson Solar Project, and gen-tie lines for other projects, noise levels associated with onsite construction and associated traffic could increase, potentially creating cumulative noise impacts. However, concurrent construction of all of these projects is unlikely, given their different timeframes for environmental analysis and permitting. The incremental effects of the Project would be negligible, and would not be cumulatively considerable (impact NOI-7).

During operations, corona noise impacts of multiple gen-tie lines in the gen-tie corridor would occur simultaneously. As discussed in Section 4.12.3.1, the closest noise sensitive receptor along the proposed gen-tie line route is location ST11, at a distance of approximately two miles, and corona noise would attenuate to lower than measured background noise (41 dBA) over this distance. Therefore, the cumulative effect of the corona noise of the gen-tie lines in the corridor would not be noticeable by local residents.

Vibration associated with the cumulative projects would attenuate within a short distance of each of the project sites, so would not overlap with other projects to create a cumulative impact (impact NOI-3). Although the Project area is located in an Airport Land Use Plan area, noise from construction, operations and maintenance, and decommissioning would attenuate to below ambient noise levels at the airport, so the contribution from the Project would not be cumulatively considerable (impact NOI-4). The Project is not located near a private airport, so would not contribute to cumulative impacts (impact NOI-6).

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

As discussed in Section 4.12.3.2, the northern boundary of the solar arrays would be moved further to the south under Alternative 2. Because the only noise source that would contribute to an increase of more than 10 dBA in the ambient sound level would be the post installation equipment, the most substantial noise source would be moved further from the location of the NNSR. In addition, the Applicant's proposal to orient the post installation equipment away from the locations of the sensitive receptors would apply to Alternative 2. Therefore, the incremental contribution of Alternative 2 to cumulative noise impacts to sensitive receptors would be lower than under the Proposed Action.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

As discussed in Section 4.12.3.3, the northern boundary of the solar arrays would be moved further to the south under Alternative 3. Because the only noise source that would contribute to an increase of more than 10 dBA in the ambient sound level would be the post installation equipment, the most substantial noise source would be moved further from the location of the NNSR. In addition, the Applicant's proposal to orient the post installation equipment away from the locations of the sensitive receptors would apply to Alternative 3. Therefore, the incremental contribution of Alternative 3 to cumulative noise impacts to sensitive receptors would be lower than under Alternatives 1 or 2.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. Alternative 4 would not contribute to cumulative noise impacts.

4.12.7 Residual Impacts

There would be no residual adverse impacts after the Applicant's proposed mitigation has been incorporated.

4.13 Paleontological Resources

4.13.1 Methodology for Analysis

This analysis of potential effects of the Proposed Action and Alternatives on paleontological resources is based on a review of relevant literature and site-specific information provided by the Applicant. Archival searches were conducted by the Natural History Museum of Los Angeles County Department of Vertebrate Paleontology (LACM), and the San Bernardino County Museum (SBCM), to identify additional information on fossil localities, and to document the occurrence of any other previously recorded but unpublished fossil locality from stratigraphic units in or near the Project site. The results of the archival search, and other literature research, were provided in the Paleontological Resources Assessment Technical Report (Reynolds and Lander 2016) and Paleontological Survey Report (El Adli 2018), which are provided in Appendix T. The information was used to assign geologic units within the area to a PFYC class, which classifies the units with respect to the potential for yielding significant fossils, in accordance with BLM protocol.

4.13.1.1 CEQA Significance Criteria

CEQA significance thresholds are based on criteria identified in Appendix G of the state CEQA Guidelines (CCR, Title 14, Division 6, Chapter 3, Sections 1500- 15387). A cultural resources impact is considered significant if implementation of the proposed Project would do any of the following:

- cause a substantial adverse change in the significance of a historical resource as defined in §15064.5;
- cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;
- directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
- disturb any human remains, including those interred outside of formal cemeteries.

Based on these thresholds, a project could have potentially significant impacts to paleontological resources if it would:

PALEO-1) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

4.13.2 Applicant-Proposed Measures

The Applicant submitted a Paleontological Survey Report for the Project in September, 2018. The report proposed the following measures, which have been adopted as Applicant-Proposed Measures:

APM Paleo-1: Qualified Professional Paleontologist

The services of a qualified professional paleontologist shall be retained by the Applicant prior to earthmoving activities associated with construction in order to carry out an appropriate mitigation

program (a paleontologist that has obtained a paleontological resource use permit from the BLM California State Office and a fieldwork authorization from the Palm Springs South Coast Field Office). The qualified professional paleontologist shall develop a site-specific Paleontological Resource Mitigation and Monitoring Plan for review and approval by the BLM prior to implementation of activities. The plan shall specify the level and types of mitigation efforts, based on the types and depths of earthmoving activities and the geological and paleontological settings of the project area. The paleontological resource mitigation plan will provide a research design that will guide any testing programs and proposed field and laboratory methods, as well outline reporting methods, plans for preparation and curation of collected materials, and a schedule for completing the proposed work. The plan should include the professional qualifications required of key staff, monitoring protocols, provisions for evaluating and treating sites discovered during earthmoving activities, and reporting requirements. If artificial fill, significantly disturbed deposits, or younger deposits (too recent to contain paleontological resources) are encountered during construction, the project paleontologist may reduce or curtail monitoring in the affected areas after consultation with the project proponent, BLM, and the County, as applicable.

Prior to the start of construction, the qualified professional paleontologist shall develop and present a paleontological sensitivity training program. This training program will be provided to all project-related workers and will address the significance and importance of paleontological resources, the potential to encounter paleontological remains during earthmoving activities, and the legal obligations related to preservation and protection of fossil resources. Reporting procedures for discovery of unexpected paleontological resources during project activities also will be provided during worker paleontological resource sensitivity training.

The qualified professional paleontologist should also attend any preconstruction meetings to consult with grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues. Communication protocols will be established to ensure that all relevant earthmoving activities are monitored and assessed to comply with the paleontological resource mitigation plan.

APM Paleo-2: Pre-Construction Survey

A short preconstruction survey will be required before earthmoving activities to recover all scientifically significant paleontological remains discovered within the project area during the paleontological field survey discussed within this report. These include the fossil horse teeth and *Lepus dentary* (Localities SRI-VP-20180002, SRI-VP-20180008, and SRI-VP-20180024; see Chapter 6 and confidential Appendix E of the paleontological survey report [El Adli 2018]). Upon collection, these paleontological resources will be prepared to the level required for acceptance at a curation facility with permanent paleontological collections, that meets DOI/BLM standards, and is named in the BLM-issued paleontological resource use permit. The specimens will then be curated and deposited within that repository, along with any relevant field notes, photographs, and reports.

APM Paleo-3: Construction Monitoring

A qualified professional paleontologist or paleontological monitor should be onsite at all times during the original cutting of previously undisturbed deposits of high paleontological resource potential (SVP 2010) or PFYC Class 3 or higher (e.g., old terrace deposits, stabilized alluvial fan

deposits, and stabilized aeolian and dune deposits) to inspect exposures for contained fossils. Units assigned to PFYC Class 3 may be spot checked, whereas those assigned to PFYC Class 4 or higher require full-time monitoring during all earth-moving activities. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials. The paleontological monitor will work under the direction of a qualified professional paleontologist. Monitoring will entail visual inspection of active or recently active construction areas. Because of the potential for recovering small fossil remains (isolated small mammal teeth, foraminifera, otoliths, etc.), onsite screen washing may be required at the discretion of the paleontological monitor or qualified professional paleontologist.

If paleontological resources are discovered during construction, the monitor will have the authority to temporarily divert or direct earthmoving activities in the immediate vicinity around the find until they are assessed for scientific significance and recovered (i.e., collected). Often, fossil salvage will be completed relatively quickly. However, some fossil specimens (e.g., large skeletons) may require an extended salvage period. Such extended salvage activities rarely (if ever) stop construction activities at a project site but may require some period during which construction activities in the immediate area are redirected.

Paleontological resources collected during monitoring will be prepared in a properly equipped fossil-preparation laboratory. Preparation will include the removal of rock matrix from fossil materials, as well as the stabilization, consolidation, and repair of specimens, as necessary. Fossil preparation will be done to the point that specimens are ready for curation. Specimens will be identified to the finest taxonomic level that is reasonably possible before being sorted and catalogued as part of the mitigation program.

Once prepared, fossils should be deposited in an appropriate facility with permanent paleontological collections, and that meets DOI/BLM standards and is named in the BLM-CA issued paleontological resource use permit, along with copies of all pertinent field notes, photographs, and maps. The cost of curation and accession of fossil specimens into such a repository will be the responsibility of the project owner and is required for compliance with the mitigation program.

APM Paleo-4: Post-Construction Reporting

Following the conclusion of all monitoring, laboratory work, and curation, a final summary report will be completed that describes the results of the paleontological resource mitigation program. This report will include an overview of the methods and procedures used during the mitigation program, will describe the stratigraphy exposed and fossils collected during construction activities, and will discuss the significance of recovered fossil finds. If monitoring efforts during the monitoring program produced fossil remains, then a copy of the final report will be provided to the designated scientific institution where the fossil specimens were deposited.

As discussed in Section 4.1.6, the impact analysis assumes that the APMs have been implemented, and these measures are therefore requirements for approval of the Project. The APMs are to be incorporated into the EICMPP/MMRCP, along with the agency-required mitigation measures.

4.13.3 Direct and Indirect Impacts

4.13.3.1 Alternative 1: Proposed Action

Construction

Project construction would include activities that require ground disturbance, including grading of roads and solar array areas, excavation of foundations, trenching for placement of underground cables, and installation of steel piles to hold solar panels. Excavations and grading may result in disturbance of soils and underlying sedimentary units up to a depth of 10 feet. For the Proposed Action, these activities are expected to result in the disturbance of approximately 3,831 acres of land. These ground disturbing actions have the potential to impact surface and subsurface paleontological resources in rock units and sediments that contain such resources.

Direct impacts to paleontological resources may include destruction due to breakage and fragmentation and loss of context in the stratigraphic record. Indirect impacts may result from increased accessibility to paleontological resources outside of the fenced Project area, resulting in an increased likelihood of looting or vandalism. Cumulative impacts could result from the Project in combination with other past, present, or reasonably foreseeable future projects' incremental contributions to impacts on paleontological resources located in similar stratigraphic units throughout eastern Riverside County. All impacts would result in a permanent loss of scientific information that might otherwise have been gained through preservation, recovery, and/or salvage of fossil resources.

The results of the Applicant's Paleontological Resources Assessment Technical Report (SRI 2016) and Paleontological Survey report (El Adli 2018) are discussed in Section 3.13.1.3. The assessment evaluated the potential for significant fossils to be present in the stratigraphic units identified on the Project site (see Figure 3.13-1 and Table 3.13-1).

The largest area of the Project site, including the entire private land parcel, is comprised of the old terrace deposits (Qot; equivalent to unit Qpv on Figure 3.7-1), which were assigned a PFYC of 4, and a SVP Category of High Potential. Because the largest area of the ground disturbance would occur in this area of high potential for the presence of significant fossils, construction of the Proposed Action has the potential to have direct, adverse impacts to paleontological resources.

Prior to beginning any ground disturbing activities, the Applicant would conduct a pre-construction field survey, as described in APM Paleo-2, and would finalize a PRIMP and provide it to BLM and the County for approval. These measures would reduce impacts to sensitive paleontological resources by identifying surficial resources in advance of ground disturbance; identifying areas with high potential for significant resources, which can be the focus of monitoring; training construction workers to identify fossil resources, including measures to take if they identify such resources; and ensuring that a qualified paleontologist is present for all earth disturbing work in sensitive areas (geologic units with PFYC Class 3(a) or higher). These measures would effectively identify fossil resources in the field during construction, and would ensure that their status is evaluated by qualified personnel, recorded, and recovered if appropriate. Implementation of the APMs as part of the Project would result in the avoidance or substantial reduction of adverse impacts to paleontological resources. Should unique fossil resources be salvaged during Project-related grading and construction, implementation of the APMs would result in an improved scientific understanding of the natural history and geology of the area that would not have been gained otherwise.

Implementation of the aforementioned APMs would not completely avoid or eliminate all potential impacts on paleontological resources resulting from Project construction, especially for activities requiring soil borings and driving of piles. Use of these methods may mean that site workers and/or paleontological monitors are unable to identify fossil resources prior to their disturbance or destruction. While intact fossils still may be found in drill cuttings, and fossils damaged by excavation equipment can sometimes be repaired in a laboratory, the nature of some of the construction methods to be used on-site means that implementation of the APMs may be unable to avoid impacts on paleontological resources.

Much of the ground disturbance associated with Project construction would be done with backhoes and graders, which would allow monitors to know the potential for significant fossils and to observe the ground before it is disturbed. As a result, construction of the Project could result in a net gain to the science of paleontology by allowing fossils that would not otherwise have been found to be identified, studied, and, if appropriate, recovered and preserved.

Operations

Operation and maintenance of the Project would not impact paleontological resources, because no earth disturbance would occur as a result of these activities.

Decommissioning

Decommissioning and closure of the Project site would not impact paleontological resources. The ground disturbed during these activities already would have been disturbed during construction, and would also be subjected to the APMs that would be required for construction.

4.13.3.2 Alternative 2: Resource Avoidance Alternative

Alternative 2 would cause the same type of paleontological resource-related impacts (beneficial and adverse) as the Proposed Action. Although the total acreage of the Project under Alternative 2 would be reduced from that of the Proposed Action, the areas that would be left undisturbed under Alternative 2 are within the stratigraphic units that have PFYC classifications of either low or unknown potential. The portion of the Project area that overlies the old terrace deposits would be approximately the same as that of the Proposed Action. Although there would be a slight reduction of ground disturbance in the area of the old terrace deposits, the reduction would not be substantial, and the potential for impacts to fossils in the old terrace deposits would be approximately the same as that of the Proposed Action.

As with the Proposed Action, the implementation of APMs Paleo-1, Paleo-2, and Paleo-3 would minimize the impact of construction-related activities by providing a mechanism for significant fossils to be identified before ground disturbance takes place; identifying areas with high potential for significant resources, which can be the focus of monitoring; training construction workers to identify fossil resources, including measures to take if they identify such resources; and ensuring that a qualified paleontologist is present for all earth disturbing work in sensitive paleontological areas.

4.13.3.3 Alternative 3: Reduced Project Alternative

Alternative 3 would cause the same type of paleontological resource-related impacts (beneficial and adverse) as the Proposed Action. However, because the size of the footprint of the solar arrays located on the old terrace deposits (Qot) would be smaller than that of the Proposed Action or Alternative 2, ground disturbance associated with construction activities on this stratigraphic unit would be reduced, and therefore the potential for adverse impacts to significant paleontological resources would be smaller.

As with the Proposed Action, the implementation of APMs Paleo-1, Paleo 2, and Paleo-3 would minimize the impact of construction-related activities by providing a mechanism for significant fossils to be identified before ground disturbance takes place; identifying areas with high potential for significant resources, which can be the focus of monitoring; training construction workers to identify fossil resources, including measures to take if they identify such resources; and ensuring that a qualified paleontologist is present for all earth disturbing work in sensitive areas.

4.13.4 Application of CEQA Significance Thresholds

PALEO-1) Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Ground disturbance associated with construction of Alternatives 1, 2, and 3 would have the potential to adversely impact significant non-renewable paleontological resources that may be present within the Project area. The large extent of the old terrace deposits (Qot), which have a High potential for discovery of unknown significant paleontological resources, makes it impossible to avoid impacts by re-configuring the Project area. The acreage of ground disturbance on the Qot would be approximately the same under Alternative 2 as with Alternative 1. The potential for ground disturbance associated with construction of Alternative 3 to adversely impact significant non-renewable paleontological resources would be lower than that associated with Alternatives 1 and 2 due to the reduced acreage of ground disturbance on the Qot. However, the impact would still be potentially significant for Alternatives 1, 2, or 3.

The implementation of APMs Paleo-1, Paleo-2, and Paleo-3 would minimize the impact of construction-related activities by providing a mechanism for significant fossils to be identified before ground disturbance takes place; identifying areas with high potential for significant resources, which can be the focus of monitoring; training construction workers to identify fossil resources, including measures to take if they identify such resources; and ensuring that a qualified paleontologist is present for all earth disturbing work in sensitive paleontological areas. When implemented, the pre-construction survey to be conducted as part of APM Paleo-2 would reduce adverse construction-related impacts on paleontological resources of Alternatives 1, 2, or 3 to a level that is less than significant.

No impacts to paleontological resources are anticipated during operation, maintenance, or decommissioning activities of Alternatives 1, 2, or 3. Should any ground disturbance occur during operations, the Applicant would follow the requirements of their APMs. Any areas disturbed during decommissioning would have already been disturbed during construction, so it is unlikely that additional undiscovered resources would be present. In addition, the requirements of the APMs would also apply to decommissioning. Accordingly, the impact of Alternatives 1, 2, and 3 would be less than significant.

4.13.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.13 would be maintained. Alternative 4 would cause no adverse impact to paleontological resources. However, the potential benefits associated with the discovery, study, and preservation of paleontological resources that could occur as a result of the Project would not be realized.

4.13.6 Cumulative Impacts

All of the past, present, and reasonably foreseeable future projects discussed in Tables 4.1-1 and 4.1-2 are primarily located on the same Holocene alluvium, Pleistocene alluvium, and dry desert washes as the DQSP. Therefore, all of the projects are considered within the geographic scope of analysis with respect to cumulative impacts on paleontological resources. Because paleontological resources are non-renewable, the temporal scope of the potential cumulative impacts is permanent.

Alternative 1 – Proposed Action

Construction

Ground disturbance associated with construction of individual projects in the cumulative scenario, if not properly mitigated, could combine to cause a cumulative loss of scientific information through disturbance or destruction of potentially significant fossil resources. Cumulative impacts to paleontological resources include the loss of non-recoverable scientifically important fossils and associated data, and the incremental loss to science and society of these resources over time.

In general, the cumulative projects are expected to have a minor adverse impact on paleontological resources, because of the volume of ground disturbance as compared to the overall volume of potentially fossil-bearing sediments. If all of the projects in the cumulative scenario were to be implemented, the resulting area of ground disturbance could amount to as much as 316,675 acres, 225,000 of which would be for the purpose of renewable energy development. The contribution of the Project to this total would be 3,831 acres, or about one percent of the total land area. Although the total land area occupied by the cumulative projects represents a considerable amount of land, there are approximately 1,544,000 acres of land underlain by Quaternary geologic units within eastern Riverside County. Even if all projects were implemented and were in operation at the same time, over 1,200,000 acres would remain undisturbed. The impact on the basis of volume results in even less of an impact. Ground disturbance associated with each project is expected to be limited to less than 10 feet, and would probably be limited to less than 3 feet across most of the Project area. This depth is negligible compared to the overall thickness of potentially fossil-bearing sediments in the area.

Implementation of APMs, such as Paleo-1, Paleo-2, and Paleo-3 would be implemented as part of the DQSP, and would also be implemented as part of many of the cumulative projects, including most of the future projects. These APMs would substantially reduce the cumulative effects of such projects on paleontological resources, and resulted in the beneficial cumulative effect of making any discovered fossils available for scientific research and education by placing them in museum

collections. The cumulative projects would also comply with Riverside County regulations and the proposed guidelines of the Society of Vertebrate Paleontology. Therefore, the Project would not adversely affect paleontological resources under NEPA or contribute to significant cumulative paleontological resource impacts under CEQA (impact PALEO-1).

Operation and Decommissioning

Operation of the cumulative projects would generally not involve ground disturbance, and thus would not contribute to cumulative impacts to paleontological resources. Decommissioning of the projects may involve ground disturbance, but only in areas that had previously been disturbed during construction. As with construction, implementation of APMs and compliance with Riverside County regulations and the proposed guidelines of the Society of Vertebrate Paleontology would be required as part of decommissioning. Therefore, no cumulative impacts would be expected as part of the operation and decommissioning of the cumulative projects.

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The contribution of Alternative 2 to cumulative impacts to paleontological resources would be the same as the Proposed Action. Therefore, Alternative 2 would not adversely affect paleontological resources under NEPA or contribute to significant cumulative paleontological resource impacts under CEQA.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The contribution of Alternative 3 to cumulative impacts to paleontological resources would be lower than the Proposed Action, due to the reduced acreage of ground disturbance on the old terrace deposits (Qot), which have a Very High potential for discovery of unknown significant paleontological resources. Therefore, Alternative 3 would not adversely affect paleontological resources under NEPA or contribute to significant cumulative paleontological resource impacts under CEQA.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. Alternative 4 would not contribute to cumulative impacts to paleontological resources.

4.13.7 Residual Impacts

Unavoidable adverse impacts to paleontological resources could occur after mitigation measures were implemented because resources could be destroyed or dislocated during construction. However, implementation of mitigation measures (MM PAL-1 through MM PAL-7) would minimize these impacts because they would ensure that destruction would not occur, or would

occur alongside an appropriate program of study. Mitigation measures would also result in a beneficial increase in knowledge related to the science of paleontology. Fossils that would not otherwise have been found would be recovered, identified, studied, and preserved. The information gained from these discoveries would further scientific knowledge of the nature and depths of subsurface geological units in the region. This expansion of knowledge would also benefit society because fossils would be stored at museums for educational use.

4.14 Recreation and Public Access

4.14.1 Methodology for Analysis

The analysis of the Proposed Action and alternatives assesses the impacts to land acreage as well as types of known recreational uses including hiking, backpacking and long-term camping in established Federal, state, or local recreation areas and/or wilderness areas. The CDCA Plan recognizes that the California Desert is “a reservoir of open space and as a place for outdoor recreation.” The CDCA Plan notes that the diverse landscape of the California desert provides for a variety of physical settings. Further, the CDCA Plan identifies the wide variety of desert recreation uses, ranging from off-road vehicles to outdoor preservationists, and the increasing challenge to accommodate these varied and sometimes competing uses. For example, LTVA visitors typically enjoy backcountry vehicle touring on routes and washes and in the surrounding areas and would therefore be affected by the closures of open vehicle routes in the vicinity of the Project. The CDCA Plan and NECO Plan Amendment to the CDCA Plan, which includes a detailed inventory and designation of open routes in the vicinity of the Project, were reviewed to determine impacts to open routes.

Under the DRECP, land use allocations under the CDCA Plan were changed. The new land use allocations included designation of Special Recreation Management Areas (SRMAs) and Extensive Recreation Management Areas (ERMAs). As an application in the Riverside East SEZ filed before June 30, 2009, the DQSP is not, and will not be, subject to the terms of the DRECP. See section II.3.3.3.5 and page II.3-126 of the DRECP. In addition, the analysis of the Project in this PA/EIS/EIR is based on the land use designations and visual resource classifications that were in effect on March 6, 2015, the date of the NOI, which do not include SRMAs and ERMAs. A discussion of the differences between the CDCA Plan and the DRECP land use allocations, and their effect on the analysis of the Project in this PA/EIS/EIR, is presented in Appendix E.

4.14.1.1 CEQA Significance Criteria

The criteria used to determine the significance of potential recreation and public access impacts are based on Appendix G of the state CEQA Guidelines. The Project would result in a significant impact under CEQA related to recreation if it would:

REC-1) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

REC-2) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

The following additional significance criterion from the County of Riverside CEQA Environmental Assessment Form is used in the analysis. A project could have potentially significant impacts if it would be:

REC-3) Located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees).

4.14.2 Applicant-Proposed Measures

There are no APMs proposed to address potential effects to recreation and public access.

4.14.3 Direct and Indirect Impacts

4.14.3.1 Alternative 1: Proposed Action

Onsite Recreation and OHV Use

Construction and Decommissioning

During construction and decommissioning of the gen-tie line near the SCE CRSS, temporary closure of route 660703, which is along an existing transmission line, may be necessary to pull and string the gen-tie line, which crosses this route. Operation and maintenance of the gen-tie line may also periodically necessitate the temporary closure of this route. Route 660703 is an open route of travel. Temporary closure of the route would affect OHV access for recreationists. To reduce temporary impacts to current users, Mitigation Measure REC-2 would require the Applicant to coordinate with BLM to temporarily close route 660703 if needed during construction and/or maintenance of the gen-tie line, and to post a public notice of the temporary route closure. Use of route 660703 would temporarily be displaced to nearby routes. Route 660703 closure would be temporary, and OHV users would be impacted by the temporary displacement of use.

All Phases

Once construction begins, BLM lands within the Project area would become inaccessible for all recreational uses until after decommissioning. Development of the Project would remove 3,616 acres from public recreation use and close 6.8 miles of routes of travel until after decommissioning, resulting in long-term impacts to public access and recreation. Recreationists would no longer be able to utilize the Project site for dispersed recreational opportunities during construction, operation, maintenance, and decommissioning. Because more than 900,000 acres of MUC-M and MUC-L lands in eastern Riverside County would remain available for recreation, the loss of 3,616 acres (approximately 0.4 percent) due to the Proposed Action would be a negligible impact.

When construction begins, the Project area will be fenced off and 6.8 miles of designated OHV routes will be closed to public use throughout the duration of the Project. Development of the Project would remove six OHV routes from public recreation use until after decommissioning, resulting in long-term impacts to public access and recreation. These routes include all or portions of routes 660862, 660863, 660866, 661092, 661102, and 661501. Three of these routes provide access to the private property inholding (660862, 660866, and 661501) within the Project area and three routes provide access to the Mule Mountains (660863, 661092, and 661102). Access to the private property inholding would no longer be necessary with the Project and there are alternative routes to the east and south of the Project area that provide access to the Mule Mountains. Mitigation Measure REC-1 would require announcement of the closure of these routes to the public at various nearby BLM recreation facilities to reduce the likelihood of decreased recreation experience quality due to unknown route closures and redirection to open routes. With the closure of the three routes that access the Mule Mountains, use of these routes would be displaced to other nearby routes that provide similar access. The alternative access route to the Mule Mountains ACEC is shown on Figure 3.14-3. This access would become from 22nd Avenue to Gravel Pit Road, west on an unpaved extension of 24th Avenue, north on existing open route 660683, and

then southwest on route 661093 to the ACEC. Due to the displacement of users of projected closed routes, the project will create increase of surface impact on the routes and require more scheduled maintenance. To ensure that this alternative access is accessible and known to persons wishing to access the area, Mitigation Measure REC-1 requires that the Applicant perform light clearing and grading prior to Project construction, and then periodically as needed during construction, operations, and decommissioning.

For all phases of the Project, activity at the site and installation of a new industrial feature could attract OHV users in the surrounding viewshed to the site boundary via designated OHV open routes or over land. This could increase the opportunities for vandalism, illegal cross-country use, and other disruptive behavior. However, this risk is estimated to very low given the presence of existing solar projects in the area, low use of the routes within the Project vicinity, and availability of several existing OHV routes in the area.

Any recreationists displaced from the Project site would likely visit nearby recreation areas, thus leading to additional recreation use in other areas and corresponding impacts (noise, crowding, wildlife displacement, etc.). There are no specifically known resources or deposits that attract rockhounding onsite. Given that use of the Project site is likely very low, and therefore there would be very little displacement, impacts from additional use would be minimal.

After decommissioning, recreational users would experience a beneficial impact as the site would be restored to its natural undeveloped state and it would be available for recreational use. The primary access routes of travel 660862 and 660863 closed by the Project, trending south from the Nichols Warm Springs exit on Interstate 10, would be re-established after decommissioning, thus re-establishing access from Interstate 10 to the Mule Mountain ACEC.

Offsite Recreation

Construction and Decommissioning

It is anticipated that some construction workers may need to reside in RV campers at the Mule Mountain and Midland LTVAs in California and possibly the La Posa LTVA south of Quartzsite in Arizona, or camp on public lands in the vicinity of the Project site during the construction phase of the Project. Although the BLM offers developed campgrounds within commuting distance of the Project (Coon Hollow and Wiley's Well Campgrounds), only the LTVAs allow long-term camping, which would be more conducive to a 25-48 month construction period. The Midland and Mule Mountains LTVAs allow camping up to 7 months (September 15 to April 15) with purchase of a long-term permit. Between April 16 and September 14, camping is allowed for up to 14 days with purchase of a short-term permit (BLM 2015). However, the short-term permit is intended for recreational uses and not for construction housing, and there is no trash pick-up and toilets are closed during this period. The applicant would need additional authorization from the BLM to allow use of the LTVA for construction housing. Because construction and decommissioning would occur year round, workers may choose to use the LTVAs during any season. Although the number of workers who may choose to use LTVAs cannot be estimated, the maximum number of construction workers present in the area would be 850.

The presence of a large number of construction workers at the LTVAs could affect the recreation experience for users of the LTVAs by reducing spacing between campers and decreasing solitude. This reduction in recreation experience quality could displace some seasonal long-term visitors to other LTVAs in Arizona or Imperial County, thus increasing crowding at these already popular

sites and thus reducing the quality of the recreation experience for users of these other LVTAs. If there is significant use of the LTVAs by construction workers, BLM may need to increase law enforcement patrols at the LTVAs, reducing patrols on public lands elsewhere.

Use of the LTVAs by a large number of construction workers could also affect the physical infrastructure of the LTVAs. However, the LTVAs contain minimal facilities because campers must use self-contained RVs and there are no assigned or designated sites, except at the Wiley's Well and Coon Hollow Campgrounds within the Mule Mountain LTVA. Except for the designated campsites at Wiley's Well and Coon Hollow, each LTVA can accommodate several hundred RV units with a minimum distance of 15 feet between units, which is far beyond the existing level of use.

The temporary increase in demand for accommodations during construction that might be caused by an influx of workers and the resulting potential impact on LTVAs and other nearby recreation areas would be reduced by Mitigation Measure REC-3. REC-3 requires the Applicant to encourage workers to utilize local housing opportunities or private RV parks in Blythe and other nearby communities instead of public lands, and to seek additional authorization from BLM for use of the LTVAs.

All Phases

The Mule Mountains ACEC is one mile from the Project site and as discussed in Section 4.12, *Noise*, construction noise would attenuate such that the sound would be barely audible to recreational users in the ACEC. As discussed in Section 4.2, *Air Resources*, construction, operation, maintenance, and decommissioning activities could generate dust in the form of PM₁₀ and PM_{2.5}. However, the worst-case PM_{2.5} and PM₁₀ impacts would occur at the fence line and drop off quickly with distance and thus would not affect recreationists in the ACEC. Other nearby BLM recreation areas are more than four miles away, and therefore would not be impacted by noise and/or dust created by construction, operation, maintenance, and decommissioning activities.

The Mule Mountains LTVA is located about 8.3 miles southwest of the Project site. Visitors camping at this LTVA are seeking opportunities for recreation experiences with similar users in a semi-primitive environment. Due to the distance of the LTVA from the Project site, there would be no impact to campers from noise and/or dust created by construction, operation, maintenance, and decommissioning activities.

Although it is possible that unauthorized use of LTVAs could occur when they are closed from April 16 to September 14, such use would be unlikely because this area experiences extremely hot weather during the closed season. However, it is likely there would be additional use during the shoulder season from April to May and September to October.

Regional and Local Recreation Resources

Due to the location of regional and local recreational facilities throughout the region, there would be no impact to users of these facilities from noise and/or dust created by construction, operation, maintenance, and decommissioning activities.

Impacts to the regional parks that provide camping (Mayflower Park, Riviera Marina Park, McIntyre Park, and Palo Verde Park) would be similar to impacts described above for LVTAs. In addition, depending on the number of construction workers using the camping facilities at these

parks, the availability of, and recreation experiences related to, other non-camping recreation uses at these parks could be affected due to increased demand.

DRECP

Under the DRECP, an area south of the Project area, north of the Palo Verde Mountains Wilderness, designated as a SRMA. However, the Project area itself is not located within or adjacent to the SRMA and would not impact recreation within the SRMA.

4.14.3.2 Alternative 2: Resource Avoidance Alternative

The type of impact of Alternative 2 on onsite recreational opportunities would be the same as for the Proposed Action. However, the onsite acreage affected would be reduced from that of the Proposed Action. Development of Alternative 2 would remove 2,608 acres from public recreation use and close 6.8 miles of routes of travel until after decommissioning, resulting in long-term impacts to public access and recreation. Because more than 900,000 acres of MUC-M and MUC-L lands in eastern Riverside County would remain available for recreation, the loss of 2,608 acres (approximately 0.3 percent) due to Alternative 2 would be a negligible impact.

Similar to the Proposed Action, construction and decommissioning of the gen-tie line for Alternative 2 would require the temporary closure of route 660703, and operation and maintenance of the gen-tie line may periodically require temporary closure of this route. Mitigation Measure REC-2, which would require the Applicant to coordinate with BLM to temporarily close route 660703 if needed during construction and/or maintenance of the gen-tie line, would apply under Alternative 2.

Construction, operation, and maintenance of Alternative 2 would require closure of 6.8 miles of open routes to public use throughout the duration of the Project. The routes which would be affected are the same as those affected by the Proposed Action, including all or portions of routes 660862, 660863, 660866, 661092, 661102, and 661501. Although Alternative 2 would involve a smaller amount of acreage than the Proposed Action, the areas which be disturbed would include at least a portion of all of these routes, so would require the same closures as would be required under the Proposed Action. Mitigation Measure REC-1, which requires announcement of the closure of these routes to the public at various nearby BLM recreation facilities, would apply to Alternative 2. For all phases of Alternative 2, activity at the site and installation of a new industrial feature could attract OHV users in the surrounding viewshed to the site boundary via designated OHV open routes or over land. This could increase the opportunities for vandalism, illegal cross-country use, and other disruptive behavior.

The impacts of construction and decommissioning workers of Alternative 2 on offsite recreation would be the same as those of the Proposed Action. The total number of workers would be the same for both alternatives, although the duration of construction and decommissioning may be shorter for Alternative 2. Similar to the Proposed Action, use of LTVAs by construction and/or decommissioning workers could impact the recreation experience for users of the LTVAs, and could also impact the physical infrastructure of the LTVAs.

The impacts of air emissions and noise from Alternative 2 on nearby recreation areas would be approximately the same as for the Proposed Action. Alternative 2 would be approximately the same distance from the Mule Mountains ACEC, and would have approximately the same peak level air emissions and noise.

4.14.3.3 Alternative 3: Reduced Project Alternative

The type of impact of Alternative 3 on onsite recreational opportunities would be the same as for the Proposed Action. However, the onsite acreage affected would be reduced from that of the Proposed Action. Development of Alternative 3 would remove 1,873 acres from public recreation use and close 6.5 miles of routes of travel until after decommissioning, resulting in long-term impacts to public access and recreation. Because more than 900,000 acres of MUC-M and MUC-L lands in eastern Riverside County would remain available for recreation, the loss of 1,873 acres (approximately 0.2 percent) due to Alternative 3 would be a negligible impact.

Similar to the Proposed Action, construction and decommissioning of the gen-tie line for Alternative 3 would also require the temporary closure of route 660703, and operation and maintenance of the gen-tie line may periodically require temporary closure of this route. Mitigation Measure REC-2, which would require the Applicant to coordinate with BLM to temporarily close route 660703 if needed during construction and/or maintenance of the gen-tie line, would apply under Alternative 3.

Construction, operation, and maintenance of Alternative 3 would require closure of 6.5 miles of open routes to public use throughout the duration of the Project. The routes which would be affected are the same as those affected by the Proposed Action and Alternative 2, including all or portions of routes 660862, 660863, 660866, 661092, 661102, and 661501. Although Alternative 3 would involve a smaller amount of acreage than the Proposed Action, the areas which be disturbed would include at least a portion of all of these routes, so would require the same closures as would be required under the Proposed Action. Mitigation Measure REC-1, which requires announcement of the closure of these routes to the public at various nearby BLM recreation facilities, would apply to Alternative 3. For all phases of Alternative 3, activity at the site and installation of a new industrial feature could attract OHV users in the surrounding viewshed to the site boundary via designated OHV open routes or over land. This could increase the opportunities for vandalism, illegal cross-country use, and other disruptive behavior.

The impacts of construction and decommissioning workers of Alternative 3 on offsite recreation would be the same as those of the Proposed Action and Alternative 2. The total number of workers would be the same for all three action alternatives, although the duration of construction and decommissioning may be shorter for Alternative 3. Similar to the Proposed Action, use of LTVAs by construction and/or decommissioning workers could impact the recreation experience for users of the LTVAs, and could also impact the physical infrastructure of the LTVAs.

The impacts of air emissions and noise from Alternative 3 on nearby recreation areas would be approximately the same as for the Proposed Action and Alternative 2. Alternative 3 would be approximately the same distance from the Mule Mountains ACEC, and would have approximately the same peak level air emissions and noise.

4.14.4 Application of CEQA Significance Thresholds

The DQSP would not include any recreational facilities, but would result in a temporary increase in population associated with construction, which would have a peak workforce of 810 employees. The presence of these workers for the 25 to 48 month long construction Project could affect use of recreation facilities in the region, although not to the point where substantial deterioration of the facilities would occur. Therefore, impacts would be considered less than significant during construction, operation, maintenance, and decommissioning.

REC-1) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Alternatives 1, 2, and 3 would not involve the use of existing neighborhood or regional parks, or other recreational facilities. However, during construction and decommissioning of any of the action alternatives, there would be a temporary increase in population that may utilize existing recreational facilities in the Project vicinity. As described in Section 4.15, *Social and Economic Effects*, it is assumed that most construction workers would utilize seasonal and vacation home rentals, which have high vacancy rates within the Project vicinity. It is unlikely that the additional workers would be concentrated in a single location, and therefore no one recreation facility would receive an increased level of use that would lead to the substantial physical deterioration of the facility.

Closure of the current access routes to the Mule Mountains could result in increased use, and therefore degradation, of the alternative access roads south and west of the Project area. To ensure that this alternative access is accessible and known to persons wishing to access the area, Mitigation Measure REC-1 requires that the Applicant perform light clearing and grading prior to Project construction, and then periodically as needed during construction, operations, and decommissioning.

The temporary use of LTVAs by construction and decommissioning workers for Alternatives 1, 2, or 3 may result in physical deterioration of the facilities. Both Wiley Well and Coon Hollow LTVAs have limited water available, and it is unlikely the LTVAs can accommodate significantly higher water use by Project employees. The LTVAs include only minimal facilities because campers must use self-contained RVs, and the LTVAs may not have the capability to accommodate significantly more water use than they currently experience. Excessive use may accelerate physical deterioration of recreational facilities such as toilets and tables, and may disrupt the experience of solitude the LTVA campers seek. Excessive use could also lead to deterioration of Wiley's Well Road, which is unpaved and maintained by Riverside County after significant rainstorms. The current motorized vehicle use creates washboards and blow-outs, making the road difficult for motorhome and trailer travel. Increased travel on the road by Project workers may make the road inaccessible to visitor's camping vehicles. Therefore, impacts to LTVAs as a result of use by workers may be significant.

During operation, the number of employees for Alternatives 1, 2, or 3 would be minimal (approximately five), and any potential impact on recreational facilities would be negligible. The five permanent workers are not expected to use temporary housing in the LTVAs. No impact would occur.

Mitigation Measure REC-1 would ensure that the alternative access roads to recreational areas in the Mule Mountains would remain accessible. Mitigation Measure REC-3 would require the Applicant to encourage workers to utilize local housing opportunities or private RV parks in nearby communities instead of public lands, and to coordinate with the County to address any deterioration in the condition of the access roads. REC-3 would also require that the workers supply their own potable water, limiting the impact on the limited water available at the LTVAs. With monitoring of impacts and corrective actions associated with Mitigation Measures REC-1 and REC-3, impacts would be reduced to less than significant for Alternatives 1, 2, or 3.

REC-2) Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Alternatives 1, 2, and 3 would not include any recreational facilities. These alternatives would result in negligible long-term increases in population. As a result, these alternatives would not require the construction or expansion of recreational facilities. No impacts would occur.

REC-3) Would the Project be located within a Community Service Area or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?

Alternatives 1, 2, and 3 would not be within a Community Service Area and would not include recreational facilities. These alternatives would not add significantly to the local population necessitating the construction or expansion of recreational facilities or cause or accelerate physical deterioration of recreational facilities. No impacts would occur.

4.14.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.14 would be maintained. The Project site would remain available for recreational uses, and the existing open routes would remain open for public use. No workers would be brought to the area, so there would be no increase of use of existing recreational facilities. There would be no air emissions or noise that would affect nearby recreation areas. Therefore, Alternative 4 would not result in any impacts to recreation resources.

4.14.6 Cumulative Impacts

The geographic scope of impacts to onsite recreational resources and OHV routes associated with the cumulative projects is eastern Riverside County. The geographic scope for increased use of LTVAs and other offsite recreational facilities by workers is Blythe and the other nearby communities which are expected to house the workers. The geographic scope of impacts from Project-related air emissions or noise to offsite recreational resources in LTVAs, parks, ACECs, and other recreation areas is limited to the immediate vicinity of each area, in which emissions or noise from one or more cumulative projects could combine to degrade the recreational qualities of that area. The temporal scope for these impacts is the duration of construction, operation, and decommissioning of the Project.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

Past, present, and reasonably foreseeable future actions making up the cumulative scenario are identified in Section 4.1. Among them, projects that also would be developed wholly or partially on lands designated as MUC-M would restrict recreational opportunities within that classification

for the duration of those projects. These projects include Palen Solar, Genesis Solar, Desert Sunlight, Desert Harvest, and RE Crimson. Each of these projects would occupy land area which would otherwise have been available for recreation and OHV use. Upon the beginning of construction for each project, and continuing through decommissioning, each of these projects would eliminate use of the land area for recreational purposes. The displacement of dispersed recreation from the Project site and other projects' development footprints could reduce the availability of short-term recreational uses for other visitors to the area. The Proposed Action would occupy approximately 3,616 acres, and the other MUC-M projects would occupy approximately 25,000 acres, for a total of approximately 28,600 acres. Of the total MUC-M and MUC-L lands in eastern Riverside County, the Proposed Action represents less than 1 percent, with a total cumulative effect of approximately 3 percent. Since more than 900,000 acres of MUC-M and MUC-L lands in eastern Riverside County would remain available for recreation, and upon completion of decommissioning these lands would again become available for recreation, no cumulative impact would result from the contribution of the Proposed Action to the impact of the past, present, and reasonably foreseeable future projects.

Each of the cumulative projects would also result in the closure of OHV open routes in the California Desert. The closures would have an adverse effect on the availability of OHV routes for recreational uses, and may result in some users seeking out other areas, legally or illegally, for their activities and experiences. In general, implementation of each project would include replacement of closed routes with other routes, so that public access to specific locations is not eliminated. However, the overall size of the network available for OHV recreation would be reduced. The effect of the overall cumulative past, present, and reasonably foreseeable projects in eastern Riverside County, in combination with the closure of OHV routes by the Proposed Action, would adversely affect OHV open routes through closures, rerouting, and use restrictions. Decommissioning activities would make these lands available for OHV opportunities, if BLM chooses to re-develop and re-open designated routes.

The Project's incremental contribution to temporary, construction-related impacts to OHV routes would be reduced through implementation of Mitigation Measures REC-1 and REC-2. Mitigation Measure REC-1 would require announcement of the closure of OHV routes to the public at various nearby BLM recreation facilities to reduce the likelihood of decreased recreation experience quality due to unknown route closures and redirection to open routes. Mitigation Measures REC-2 requires coordination of temporary closure of OHV routes during construction with the BLM.

It is anticipated that construction or decommissioning workers for the Project could reside in RV campers at the Mule Mountain and Midland LTVAs in California and the La Posa LTVA south of Quartzsite in Arizona. Each LTVA can accommodate several hundred RV units, and current use is much lower than capacity. Other projects in the cumulative scenario would also result in an influx of construction workers who may choose to reside in LTVAs during the permitted season. Impacts to LTVAs from maximum authorized use by construction workers would be to reduce the availability of these areas to recreational campers. This would have an adverse impact on the social and recreation experience of winter users, as well as to the potential need for increased law enforcement patrols, reducing the available patrols for other public lands. Implementation of Mitigation Measure REC-3 would require the Applicant to encourage workers to utilize local housing or private RV parks, and to seek additional authorization from BLM for use of the LTVAs, thus reducing the Project's contribution to these cumulative impacts.

The cumulative projects could potentially impact recreational facilities and/or the recreational experience for other visitors if the influx of project workers substantially increases demand for use of local or regional parks, LTVAs, and other specific recreational areas. The cumulative projects are not expected to individually result in substantial adverse impacts to recreation. Although each of the projects would potentially increase local populations and demand for recreation during their construction phases, this increase would likely be temporary for each project, and would also probably not overlap for all projects during the same time period. Because construction of each of the projects would be temporary, and the size of the operational workforces would be nominal, the cumulative projects are not expected to induce substantial growth to the regional population levels. As such, the cumulative effect on recreational facilities would be nominal, and cumulative impacts would be less than significant (impact REC-1).

Each of the cumulative projects could also potentially impact the recreational experience for other visitors if they were to generate air emissions or noise in the vicinity of local or regional parks, LTVAs, and other specific recreational areas. The ability of each individual project to have such an impact would decrease with distance away from the project, so only projects within a very limited area around each individual recreation area could combine to create a cumulative impact to that area. As discussed in Section 4.14.3.1, air emissions and noise from the Project are not expected to be noticeable in the closest recreation area, which is the Mule Mountains ACEC. Two other local projects, the RE Crimson Solar facility and the Mule Mountain III Solar facility, would be located near the ACEC, and may contribute air emissions and noise which could impact that area. However, the incremental contribution of the Proposed Action to that impact would not be noticeable.

The Project would not require construction of recreation facilities (impact REC-2), and would not be located in a Community Service Area or recreation and park district with a Community Parks and Recreation Plan (impact REC-3).

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The contribution of Alternative 2 to cumulative impacts to recreation would be approximately the same as the Proposed Action. Alternative 2 would occupy approximately 2,608 acres, and the other MUC-M projects would occupy approximately 25,000 acres, for a total of approximately 27,608 acres. Of the total MUC-M and MUC-L lands in eastern Riverside County, Alternative 2 represents less than 1 percent, with a total cumulative effect of approximately 3 percent. Since more than 900,000 acres of MUC-M and MUC-L lands in eastern Riverside County would remain available for recreation, and upon completion of decommissioning these lands would again become available for recreation, no significant cumulative impact would result from the contribution of Alternative 2 to the impact of the past, present, and reasonably foreseeable future projects. Mitigation Measure REC-1 would require announcement of the closure of these routes to the public at various nearby BLM recreation facilities to reduce the likelihood of decreased recreation experience quality due to unknown route closures and redirection to open routes. Mitigation Measure REC-2 would require the Applicant to coordinate short-term closures during construction with BLM.

The contribution of Alternative 2 to other cumulative impacts to recreation, including OHV routes, LTVAs, ACECs, and other local or regional parks, would be the same as those described for the

Proposed Action. Mitigation Measure REC-3 would require the Applicant to encourage workers to utilize local housing or private RV parks, and to seek additional authorization from BLM for use of the LTVAs, reducing potential impacts associated with use of the LTVAs for housing workers.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The contribution of Alternative 3 to cumulative impacts to recreation would be approximately the same as the Proposed Action. Alternative 3 would occupy approximately 1,873 acres, and the other MUC-M projects would occupy approximately 25,000 acres, for a total of approximately 26,873 acres. Of the total MUC-M and MUC-L lands in eastern Riverside County, Alternative 3 represents less than 1 percent, with a total cumulative effect of approximately 3 percent. Since more than 900,000 acres of MUC-M and MUC-L lands in eastern Riverside County would remain available for recreation, and upon completion of decommissioning these lands would again become available for recreation, no significant cumulative impact would result from the contribution of Alternative 3 to the impact of the past, present, and reasonably foreseeable future projects. Mitigation Measure REC-1 would require announcement of the closure of these routes to the public at various nearby BLM recreation facilities to reduce the likelihood of decreased recreation experience quality due to unknown route closures and redirection to open routes. Mitigation Measure REC-2 would require the Applicant to coordinate short-term closures during construction with BLM.

The contribution of Alternative 3 to other cumulative impacts to recreation, including OHV routes, LTVAs, ACECs, and other local or regional parks, would be the same as those described for the Proposed Action. Mitigation Measure REC-3 would require the Applicant to encourage workers to utilize local housing or private RV parks, and to seek additional authorization from BLM for use of the LTVAs, reducing potential impacts associated with use of the LTVAs for housing workers.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. There would be no occupation of land area which would interfere with current recreational uses or OHV routes, no use of recreational facilities by workers, and no air emissions or noise which could affect recreational experiences. Therefore, the No Action Alternative would not contribute to cumulative recreation impacts.

4.14.7 Residual Impacts

Following implementation of mitigation measures, all adverse impacts on recreation and OHV access resulting from construction, operations and maintenance, and decommissioning of the Project and alternatives would be avoided or substantially reduced.

4.15 Social and Economic Effects

4.15.1 Methodology for Analysis

The CEQ's *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act* (40 CFR Parts 1500-1508; reprinted in CEQ, 2005) provides guidelines for addressing social and economic effects in preparing an environmental impact statement. Section 1508.14 of these regulations states that:

“Human environment” shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment. . . . This means that economic or social effects are not intended by themselves to require preparation of an environmental impact statement. When an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment.

In §1508.8(b), the regulations state that indirect effects of an action “may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.”

Consistent with these regulations, the analysis of socioeconomic impacts includes examination of impacts of the Project and alternatives with respect to the following issues:

1. Housing availability and the character of local communities that may result from employment of workers for the construction, operation, and decommissioning;
2. Employment and economy of Riverside County from spending and employment; and
3. Revenues of the County government which would provide local public services.

The analysis of potential socioeconomic effects of the Proposed Action and alternatives takes place in the context of physical effects related to population and housing. An input-output model (IMPLAN) was used to estimate the indirect and induced economic impacts from construction operation, maintenance, and decommissioning of the DQSP.

4.15.1.1 CEQA Significance Criteria

The criteria used to determine the significance of the Project-related socioeconomic impacts are based on the criteria identified in the state CEQA Guidelines, Appendix G. Project-related impacts would be considered significant if they:

SOC-1) Induce substantial population growth in an area, either directly or indirectly.

SOC-2) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

SOC-3) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

The following additional significance criteria from the County of Riverside Environmental Assessment form are used in the analysis. A project could have potentially significant impacts if it would:

SOC-4) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income.

SOC-5) Affect a County Redevelopment Project Area.

SOC-6) Cumulatively exceed official regional or local population projections.

4.15.2 Applicant-Proposed Measures

There are no APMs to address potential social and economic effects.

4.15.3 Direct and Indirect Impacts

4.15.3.1 Alternative 1: Proposed Action

Construction

Housing and Community

Construction employment and spending for the Project is the primary mechanism by which the DQSP would cause a socioeconomic impact. Construction would be temporary and is expected to last for a maximum of 48 months. Given the absence of existing significant economic uses of the site, Project construction would not displace any current economic activity. As discussed in Section 3.15, *Social and Economic Setting*, the location of construction workers is a key factor determining the extent of potential impacts to the local economy and communities. Income from employment primarily would benefit the communities in which the construction workers and their families reside because this is where most household expenditures occur. Also, the distance between workers' residences and the DQSP site would affect the choice of transportation and decision on whether to engage in "weekly commuting" or other forms of temporary relocation while working on the Project.

The number of construction workers on-site would be a maximum of 810, with an average workforce of 450 workers. Most construction workers are expected to come from western Riverside County, where, along with San Bernardino County, a substantial number of workers in relevant occupations reside (over 159,000 workers; Table 3.15-7). It is possible, however, that some workers will come from Imperial County, La Paz County, or Maricopa County.

With the exception of eastern Coachella Valley, most of western Riverside County is two hours or more travel time away from the Project site (see Figure 3.15-1). Since construction is a temporary assignment, it is not expected that workers from outside the Blythe area would relocate to Blythe permanently in order to work at the Project site. Data reviewed in Section 3.15.1 also indicate that some workers may engage in "weekly commuting," in which they find temporary or transient housing closer to the jobsite during the workweek. It is expected that such workers would seek temporary housing in the Blythe area, where both rental housing as well as a large number of hotel or motel rooms would be available.

According to the 2009-2013 American Community Survey, there were 196 housing units for rent in the City of Blythe and an additional 60 units in the nearby communities of Ehrenberg and Mesa Verde (Table 3.15-2). As indicated in Section 3.15, there are more than 1,000 hotel rooms in Blythe, four additional hotels in Ehrenburg and Quartzsite, and another 14,842 hotel rooms within a 1 to 2 hour drive. In addition, there are numerous RV facilities, mobile home sites, and campgrounds in Blythe and surrounding areas, which could provide alternative forms of temporary

housing. Thus, there would be a sufficient supply of temporary housing options to accommodate workers who may seek temporary housing near the jobsite.

Regional Employment and Economy

With unemployment rates of 6.3 percent in Riverside County and 8.2 percent in La Paz County (September 2015), employment of workers for Project construction would have a beneficial effect in helping to reduce unemployment.

Project construction would create a temporary, positive impact on the local economic base and fiscal resources. Construction employment wages and salaries would provide additional income to the area, as would expenditures within Riverside County for construction materials and services. The Project construction payroll has been estimated at approximately \$80 million a year. Capital expenditures and local spending on construction materials and equipment within Riverside County is estimated to average \$20 million annually. Project construction is expected to directly create an average of 450 annual full-time employees over 48 months, with a peak monthly employment of 800 full-time workers.

Employment and resulting labor income also would have beneficial effects in Riverside County as a whole. These are estimated using a regional input-output model of Riverside County’s economy (MIG 2015). Starting with expenditures or employment for a given project, also called the *direct* impact, an input-output model represents major inter-industry (i.e., business-to-business) transactions in the region of interest, as well as transactions with households, government, and import/export with economies outside the region. Multipliers derived from the model can be used to estimate *indirect* impacts (business-to-business, or supplier, transactions following expenditures by a project) and *induced* impacts (expenditures by households of workers employed by the Project and by the chain of suppliers to the Project). The sum of direct, indirect, and induced impacts represents the total economic or employment impact to the region. For purposes of this analysis, Riverside County is the region of interest, since the majority of workers are expected to come from the County and Project-related direct impacts would occur in the County.

For the purpose of the input-output model, the following Project expenditures (rounded values) were assumed to be the Project expenditures that would benefit the Riverside economy: 1) estimated annual payroll (\$800 million); 2) estimated annual local capital expenditures and materials (\$10.4 million); and 3) estimated annual average employment (450 employees).

Based on these assumptions, the total estimated annual beneficial economic impacts from the 25 to 48-month construction phase within Riverside County would be \$72.5 million, as shown in Table 4.15-1.

Table 4.15-1. Regional Employment and Income Impacts from Project Construction

Construction	Employment (Jobs)	Labor Income (\$ Million)	Output (\$ Million)
Direct Effect	450.0	80.0	20.0
Indirect Effect	32.1	1.2	3.9
Induced Effect	411.2	14.8	48.6
Total Effect	893.3	96.0	72.5

Note: Sector modeled is 54 Construction of new power and communication structures.
Region is Riverside County. Income and output are in 2014 dollars. Figures may not add to totals as shown due to rounding.
Source: MIG 2015

The top five industries that would benefit the most in terms of economic output impacts include: construction, real estate, limited-service restaurants, full-service restaurants, and individual and family services (e.g., activity centers, community social services).

Also, using the assumptions above during the construction phase, the Project's estimated annual job creation within the study area would be 893.3 positions (Table 4.15-1).

Riverside County Revenues

The economic benefits of increased income and employment would result in indirect and induced revenue, and potential expenditures in the surrounding counties; however, the precise distribution of labor force among these counties is not known. Because Riverside County would provide most of the local government services to the Project, such as police and fire protection, this analysis focuses on Riverside County.

During construction, the primary revenue source for the County would be the sales and use taxes levied on construction materials and supplies. The current sales tax rate applicable to unincorporated Riverside County is 8.0 percent, of which the County directly receives 1.5 percent, with 0.5 percent for the Riverside County Transportation Commission, 0.25 percent for County transportation funds, and 0.75 percent for County operations (California State Board of Equalization (BOE) 2013; BOE 2015a).

Sales and use taxes are levied on materials and supplies used for construction in the jurisdiction where the jobsite is located. For the Project, the principal materials subject to these taxes would be components of the solar energy generating system, including PV modules or panels, mounting and tracking systems, electrical components, inverters, and other materials. Based on data collected by National Renewable Energy Laboratory (NREL 2011), these components are estimated to cost \$2,268 per kW.

The NREL cost estimate includes \$1,598 per kW for solar PV modules (thin film), the most expensive component of the energy generating system. Other materials tabulated by the NREL cost estimate include mountings (rails, clamps, fittings, etc.), at \$178 per kW; electrical materials (wire, connectors, breakers, etc.), at \$202 per kW; and inverters, at \$290 per kW. Based on these estimates, the total material cost for a 450 MW facility would be approximately \$719 million. Sales tax revenues allocated to the County (1.5 percent) would be approximately \$10.8 million.

The BOE generally distributes sales and use tax revenues from construction materials and supplies to local governments through a countywide pool, unless a special procedure is used to allocate all such revenues to the jurisdiction of the jobsite. Under the countywide pool, the unincorporated county would receive a percentage of the revenues, which varies by quarter according to sales and use taxes collected. In the third quarter of 2015, the County received 8.0 percent of the countywide pool (BOE 2015b). Under such an allocation, the County would receive about \$864,000 in sales tax revenues from construction materials.

Operation and Maintenance

Housing and Community

Permanent operating staff for the Project would number approximately 5 workers. In contrast to construction employment, it is expected that these workers would be either hired locally or, if hired from outside the Blythe area, would relocate to the area. Due to the numbers of vacant homes for

sale (62 units in the City of Blythe) or for rent (196 units in the city), there would be minimal impact to the local housing supply or the community, even if all permanent workers were to relocate to the Blythe area.

Regional Employment and Economy

The employment of 5 workers for operation and maintenance would not adversely affect the regional labor market with current (September 2015) unemployment rates of 6.3 percent in Riverside County and 8.2 percent in La Paz County, but instead would have a beneficial effect.

An input-output model was used to estimate economic impacts within Riverside County based on operation-phase Project expenditures that would benefit the local economies. For input-output analysis, it is assumed that the 5-person operating staff would consist of workers in the following industries: 3 workers in electric power generation and transmission and 2 workers in electronic and precision equipment maintenance. Annual expenditures were based on assumed values for Riverside County for these two industries. Payroll was estimated by the Applicant to be \$500,000 annually.

Table 4.15-2 shows that total employment and economic impact in the County, including direct, indirect, and induced impacts, would be 10.7 workers, with total income impact of \$0.7 million, and output impact of \$3.0 million per year.

Table 4.15-2. Regional Employment and Income Impacts from Project Operation

Operation	Employment	Labor Income (\$ Million)	Output (\$ Million)
Direct Effect	5.0	0.5	2.3
Indirect Effect	2.6	0.1	0.3
Induced Effect	3.1	0.1	0.4
Total Effect	10.7	0.7	3.0

Note: Sectors modeled are 44 Electric Power Generation – Solar and 506 Electronic and Precision Equipment Repair and Maintenance.

Region is Riverside County. Income and output are in 2014 dollars. Figures may not add to totals as shown due to rounding.

Source: MIG 2015

Riverside County Revenues

Consistent with Board Policy No. B-29 regarding solar power plant payments, the solar power plant owner shall annually pay to the County a public benefit payment of \$150 per acre for land involved in the power production process. This shall be done through a negotiated development agreement between the County and solar power plant owner. Additionally, the development agreement will contain terms requiring the solar power plant owner to take actions to ensure allocation directly to the County of the sales and use taxes payable in connection with the construction of the solar power plant, to the maximum extent possible under the law. The estimated tax revenue to the County under the Proposed Action would be approximately \$565,000 per year.

The largest improvement of the Project that would be subject to property taxation is the gen-tie line. Even when constructed on tax-exempt BLM land, private improvements such as the gen-tie line are taxable as possessory interest. The estimated length of this line, including both inside and outside the Project site boundaries, is 3.0 miles. The Applicant has not provided a cost estimate for the gen-tie line. However, an economic study of a similar solar PV energy project in Imperial County (Imperial County 2011) estimated that construction of a 5-mile gen-tie line over BLM land would cost \$12.4 million, or approximately \$2.48 million per mile. Based on this example, it is estimated that the taxable value of the proposed gen-tie line, excluding land, would be nearly \$6.9 million.

The average rate of property taxation in the County in fiscal year (FY) 2013-14 was 1.158 percent, generating total taxes of approximately \$2.4 billion (BOE 2014). This was distributed to the County, cities, schools, special districts, and other agencies. According to the Riverside County Assessor-County Clerk-Recorder's (ACR) office, property taxes distributed to local agencies in FY 2013-2014 totaled \$2.2 billion, of which 7.1 percent went to cities, 11.2 percent to the County, and the remainder to other agencies (Riverside County 2015e).

For purposes of this analysis, it is assumed that the County would receive 18.3 percent of the 1.158 percent tax collected from the Project site. Estimated property tax revenue to the County from the gen-tie line thus would be approximately \$14,660 per year.

Although it is likely that the Project would generate additional property tax revenues from onsite improvements not directly related to solar energy generation, no cost estimates are available for these improvements.

Decommissioning

After 30 years of operation, the Project would be decommissioned, with all equipment and improvements dismantled and removed from the site, and the site would be restored to an undeveloped condition. Decommissioning is expected to take up to a year to complete. As discussed in Section 2.3.6, the workforce required for decommissioning is expected to be approximately the same size as that required for construction.

Housing and Community

As in the case of Project construction, the temporary decommissioning workforce would likely come mostly from western Riverside County and a smaller number from the Blythe area and La Paz County. Although the size of the workforce would be approximately the same size as that for construction, the duration of decommissioning, about one year, would be shorter than that for construction. As a result, it is likely that a larger proportion of workers would commute, as opposed to relocating to the area. Therefore, although it is not possible to estimate the availability of rental properties and hotel accommodations that would be available in the area at that time, it is likely that the demand on those accommodations would be lower than that associated with Project construction.

Regional Employment and Economy

It is difficult to forecast employment conditions for 30 years into the future. Even if unemployment rates in Riverside and La Paz counties decline to lower levels, such as those projected for the near-term, demand for workers for decommissioning of the Project would not have an adverse impact

on the regional or local labor market. Expenditures for decommissioning, including payments to workers, would have a beneficial effect on the regional economy. However, the linear input-output model of 2014 cannot be applied to the decommissioning work, since the regional economy undoubtedly will experience substantial changes in the intervening years.

Riverside County Revenues

No substantial sales or property tax revenues would be generated during or after decommissioning because the improvements which were the basis for the tax revenue would cease to exist.

4.15.3.2 Alternative 2: Resource Avoidance Alternative

Construction

The construction workforce for Alternative 2 is expected to be approximately the same as for the Proposed Action; therefore, there would be a sufficient supply of temporary housing options to accommodate workers who may seek temporary housing near the jobsite. Additionally, estimated impacts on regional employment, worker income, and the output of construction companies are the same as those shown in Table 4.15-1. Due to the reduced acreage, the duration of construction would be reduced incrementally from that of the Proposed Action, but the average and peak workforces would be similar to those of the Proposed Action. Therefore, impacts of construction of Alternative 2 would be similar to those of the Proposed Action, but would occur for a shorter timeframe.

The total material cost of Alternative 2 materials and supplies is also expected to be approximately the same as the Proposed Action. Therefore, the total estimated annual beneficial economic impacts from the construction phase within Riverside County would be \$72.5 million, as shown in Table 4.15-1. Similarly, the Riverside County revenue would be the same as for the Proposed Action, or approximately \$864,000.

Operation and Maintenance

Housing and Community

Permanent operating staff for Alternative 2 would be the same as for the Proposed Action, or approximately 5 workers. As with the Proposed Action, there would be minimal impact to the local housing supply or the community, even if all permanent workers were to relocate to the Blythe area.

Regional Employment and Economy

The employment of 5 workers for operation and maintenance for Alternative 2 would not adversely affect the regional labor market with current (September 2015) unemployment rates of 6.3 percent in Riverside County and 8.2 percent in La Paz County, but instead would have a beneficial effect.

The input-output model used to estimate economic impacts within Riverside County for the Proposed Action is also applicable to Alternative 2. Table 4.15-2 shows that total employment and economic impact, including direct, indirect, and induced impacts, would be 10.7 workers, with total income impact of \$0.7 million, and output impact of \$3.0 million per year.

Riverside County Revenues

Consistent with Board Policy No. B-29 regarding solar power plant payments, the solar power plant owner shall annually pay to the County a public benefit payment of \$150 per acre of land involved in the power production process. This shall be done through a negotiated development agreement between the County and solar power plant owner. Additionally, the development agreement will contain terms requiring the solar power plant owner to take actions to ensure allocation directly to the County of the sales and use taxes payable in connection with the construction of the solar power plant, to the maximum extent possible under the law. The estimated tax revenue to the County under Alternative 2 would be \$439,500 per year.

During operation and maintenance of Alternative 2, another revenue source for the County would be property tax revenue based on the private improvements of the gen-tie line. The estimated length of this line, including both inside and outside the Alternative 2 site boundaries, is 4.0 miles. The Applicant has not provided a cost estimate for the gen-tie line. However, an economic study of a similar solar PV energy project in Imperial County (Imperial County 2011) estimated that construction of a 5-mile gen-tie line over BLM land would cost \$12.4 million, or approximately \$2.48 million per mile. Based on this example, it is estimated that the taxable value of the proposed gen-tie line, excluding land, would be approximately \$9.8 million. Using the assumption that the County would receive 18.3 percent of the 1.158 percent tax collected on the gen-tie line, the estimated property tax revenue to the County under Alternative 2 would be approximately \$20,700 per year.

Although it is likely that Alternative 2 would generate additional property tax revenues from onsite improvements not directly related to solar energy generation, no cost estimates are available for these improvements.

Decommissioning

After 30 years of operation, Alternative 2 would be decommissioned, with all equipment and improvements dismantled and removed from the site, and the site would be restored to an undeveloped condition. Decommissioning is expected to take up to a year to complete, and is expected to require a workforce substantially smaller than that required for construction.

Housing and Community

As in the case of Alternative 2 construction, the temporary decommissioning workforce would likely come mostly from western Riverside County and a smaller number from the Blythe area and La Paz County. Many workers would likely commute to the site. For workers who choose to commute weekly and temporarily relocate to the Blythe area during the workweek, it is expected that sufficient numbers of rental properties and hotel and motel accommodations would be available in the area.

Regional Employment and Economy

It is difficult to forecast employment conditions for 30 years into the future. Even if unemployment rates in Riverside and La Paz counties decline to lower levels, such as those projected for the near-term, demand for workers for decommissioning of Alternative 2 would not have an adverse impact on the regional or local labor market. Expenditures for decommissioning, including payments to workers, would have a beneficial effect on the regional economy. However, the linear input-output

model of 2014 cannot be applied to the decommissioning work, since the regional economy will experience substantial changes in the intervening years.

Riverside County Revenues

No substantial sales or property tax revenues would be generated during or after decommissioning because the improvements which were the basis for the tax revenue would cease to exist.

4.15.3.3 Alternative 3: Reduced Project Alternative

Construction

The construction workforce for Alternative 3 is expected to be approximately the same as for the Proposed Action; therefore, there would be a sufficient supply of temporary housing options to accommodate workers who may seek temporary housing near the jobsite. Additionally, estimated impacts on regional employment, worker income, and the output of construction companies are the same as those shown in Table 4.15-1. Due to the reduced acreage, the duration of construction would be reduced incrementally from that of the Proposed Action and of Alternative 2, but the average and peak workforces would be similar to those of the Proposed Action. Therefore, impacts of construction of Alternative 3 would be similar to those of the Proposed Action, but would occur for a shorter timeframe.

The total material cost of Alternative 3 materials and supplies is expected to be approximately the same as the Proposed Action. Therefore, the total estimated annual beneficial economic impacts from the construction phase within Riverside County would be \$72.5 million, as shown in Table 4.15-1. Similarly, the Riverside County revenue would be the same as for the Proposed Action, or approximately \$864,000.

Operation and Maintenance

Housing and Community

Permanent operating staff for Alternative 3 would be the same as for the Proposed Action, or approximately 5 workers. As with the Proposed Action, there would be minimal impact to the local housing supply or the community, even if all permanent workers were to relocate to the Blythe area.

Regional Employment and Economy

The employment of 5 workers for operation and maintenance for Alternative 3 would not adversely affect the regional labor market with current (September 2015) unemployment rates of 6.3 percent in Riverside County and 8.2 percent in La Paz County, but instead would have a beneficial effect.

The input-output model used to estimate economic impacts within Riverside County for the Proposed Action is also applicable to Alternative 3. Table 4.15-2 shows that total employment and economic impact, including direct, indirect, and induced impacts, would be 10.7 workers, with total income impact of \$0.7 million, and output impact of \$3.0 million per year.

Riverside County Revenues

Consistent with Board Policy No. B-29 regarding solar power plant payments, the solar power plant owner shall annually pay to the County a public benefit payment of \$150 per acre of land involved in the power production process. This shall be done through a negotiated development agreement between the County and solar power plant owner. Additionally, the development agreement will contain terms requiring the solar power plant owner to take actions to ensure allocation directly to the County of the sales and use taxes payable in connection with the construction of the solar power plant, to the maximum extent possible under the law. The estimated tax revenue to the County under Alternative 3 would be \$299,400 per year.

During operation and maintenance of Alternative 3, another revenue source for the County would be property tax revenue based on the private improvements of the gen-tie line. The estimated length of this line, including both inside and outside the Alternative 3 site boundaries, is 4.0 miles, the same as for Alternative 2. The Applicant has not provided a cost estimate for the gen-tie line. However, an economic study of a similar solar PV energy project in Imperial County (Imperial County 2011) estimated that construction of a 5-mile gen-tie line over BLM land would cost \$12.4 million, or approximately \$2.48 million per mile. Based on this example, it is estimated that the taxable value of the proposed gen-tie line, excluding land, would be approximately \$9.8 million. Using the assumption that the County would receive 18.3 percent of the 1.158 percent tax collected on the gen-tie line, the estimated property tax revenue to the County under Alternative 3 would be approximately \$20,700 per year.

Although it is likely that Alternative 3 would generate additional property tax revenues from onsite improvements not directly related to solar energy generation, no cost estimates are available for these improvements.

Decommissioning

After 30 years of operation, Alternative 3 would be decommissioned, with all equipment and improvements dismantled and removed from the site, and the site would be restored to an undeveloped condition. Decommissioning is expected to take up to a year to complete, and is expected to require a workforce substantially smaller than that required for construction.

Housing and Community

As in the case of Alternative 3 construction, the temporary decommissioning workforce would likely come mostly from western Riverside County and a smaller number from the Blythe area and La Paz County. Many workers would likely commute to the site. For workers who choose to commute weekly and temporarily relocate to the Blythe area during the workweek, it is expected that sufficient numbers of rental properties and hotel and motel accommodations would be available in the area.

Regional Employment and Economy

It is difficult to forecast employment conditions for 30 years into the future. Even if unemployment rates in Riverside and La Paz counties decline to lower levels, such as those projected for the near-term, demand for workers for decommissioning of Alternative 3 would not have an adverse impact on the regional or local labor market. Expenditures for decommissioning, including payments to workers, would have a beneficial effect on the regional economy. However, the linear input-output

model of 2014 cannot be applied to the decommissioning work, since the regional economy will experience substantial changes in the intervening years.

Riverside County Revenues

No substantial sales or property tax revenues would be generated during or after decommissioning because the improvements which were the basis for the tax revenue would cease to exist.

4.15.4 Application of CEQA Significance Thresholds

SOC-1) Would the Project induce substantial population growth in an area, either directly or indirectly?

The construction of Alternatives 1, 2, or 3 would temporarily increase population growth in the area; however, it would not be substantial. This is because the required construction and operational workforce is not projected to trigger the need for new housing. As illustrated in Table 3.15-3, vacancy rates in the population and housing study area are high (8.0 to 48.2 percent), which include seasonal, recreational, and occasional use units. Additionally, within an hour commute, there are a high number transient lodging opportunities to serve construction employees. Furthermore, vacancy rates within the study area offer ample available housing to operational employees wishing to relocate within the local study area. Therefore, no significant construction- or operation-related impacts are expected for the study area housing supply, availability, or demand. Alternatives 1, 2, or 3 would not displace populations or existing housing, and it would not necessitate construction of replacement housing elsewhere. Impacts would be less than significant.

SOC-2) Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Alternatives 1, 2, or 3 would not displace existing housing units. No impacts to existing housing would occur.

SOC-3) Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Alternatives 1, 2, or 3 would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. No impacts would occur.

SOC-4) Would the Project create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?

Alternatives 1, 2, or 3 would not result in a permanent increase in the population which would increase the permanent demand for housing, or temporarily increase demand for housing. Due to the temporary nature of Alternatives 1, 2, and 3 construction activities, it is unlikely that construction workers would permanently relocate closer to the area with their families.

Operation of Alternatives 1, 2, or 3 would require a nominal workforce and are not anticipated to increase the local population. Therefore, Alternative 1, 2 or 3 would not create a demand for additional housing. Impacts would be less than significant impact.

SOC-5) Would the Project affect a County Redevelopment Project Area?

Alternatives 1, 2, and 3 and their immediate vicinity would not be within a former County Redevelopment Project Area. No impact would occur.

SOC-6) Would the Project cumulatively exceed official regional or local population projections?

See SOC-4 above. Alternatives 1, 2, or 3 would temporarily increase the population during construction; however, they would not include housing and would require a nominal operational workforce. Alternatives 1, 2, or 3 would not permanently increase the local population, nor would they cumulatively exceed regional or local population projections. Impacts would be less than significant.

4.15.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.15 would be maintained. There would be no employment or expenditures that would generate a beneficial economic impact.

4.15.6 Cumulative Impacts

The potential for cumulative socioeconomic impacts exists where there are multiple projects proposed in an area that have overlapping construction schedules and/or project operations that could affect similar resources. Projects with overlapping construction schedules and/or operations could collectively result in a demand for labor that cannot be met by the region's labor pool, which could lead to an influx of non-local workers and possibly their dependents. This population increase could impact social and economic resources if there are insufficient housing resources and/or infrastructure and public services to accommodate the new residents' needs.

Section 4.1.5 identifies current solar and non-solar projects that have been or could be developed in the foreseeable future within eastern Riverside County. While a large number of projects may be planned, and so considered to be possible for future development, not all of them are expected to be built due to construction funding constraints, schedule, and/or delays. Given the uncertain and challenging economic circumstances facing Federal and state economies as well as private developers, it is far from assured that future funding and other necessary support will be sufficiently available for all of the proposed projects to be realized within the projected schedules.

As shown in Table 4.1-2, currently eight BLM renewable energy projects are identified in the cumulative project scenario for the social and economic analysis. In addition, eight other projects

are also identified that could require workers with similar skills to the Project, including non-BLM renewable energy projects, transmission lines, and electrical substations. The geographic scope of the cumulative impacts analysis includes populated areas within a 2-hour commute distance of any of these projects, which would extend as far west as Moreno Valley, given the locations of the cumulative projects. Although the 2-hour commute distance would also extend into Arizona, the low population in western Arizona would contribute minimally to the available labor pool in the geographic scope. Therefore, the analysis for employment focuses on the California portion of this area.

There are 12 solar projects proposed or under construction along the I-10 corridor predominantly between Desert Center and Blythe. Some of these projects have already completed construction. Based on the currently available data for these various projects (information obtained from Plans of Development and other project documents), and assuming all projects move forward, these projects would be constructed in the same general timeframe as the Proposed Action (i.e. between 2017 and 2020).

The cumulative analysis conservatively assumes that the construction of all of the proposed solar projects would be under construction within the 48-month cumulative timeframe for construction-related impacts of the Project. This cumulative impacts discussion is based on available data with respect to both construction schedules and the projects' labor requirements. If construction and operating labor requirements are not known for some projects, average work force levels of other comparable projects and professional judgments have been used to develop conservative estimates of expected cumulative labor requirements for these projects.

4.15.6.1 Alternative 1 – Proposed Action

4.15.6.1.1 Economic

Construction

Cumulative Construction Labor Needs

Table 4.15-3 shows the estimated construction workforces for several of the projects in the cumulative scenario and the DQSP. The workforce numbers from other recent projects for which these data are available (Modified BSPP, Desert Quartzite, MSEP, BMSP, Palo Verde Mesa Solar, Genesis Solar, Desert Harvest, and Desert Sunlight) were used to estimate the average and peak construction workforces per MW of solar projects. The average and peak workforce per MW was then used to estimate the workforce for those reasonably foreseeable future projects for which no workforce data is available.

If all proposed solar projects identified in eastern Riverside County are constructed (including the Project), a total of 3,106 MW of new solar power would be developed. The average solar power project would be approximately 400 MW in size and may be expected to require an average of approximately 318 full-time workers to be built. The average peak labor force may be up to 586 workers. Because the precise construction schedules for each project are currently unknown, this analysis assumes that the peak construction periods of the solar projects in the cumulative scenario would be of a similar length to the Project (three years).

Table 4.15-3. Average and Peak Construction Employment for Future Solar Projects

Project	MW	Average Workers	Peak Workers
Modified Blythe Solar Power Project	485	340	500
Desert Quartzite	450	450	810
Palen Solar Project	500	566	1145
Desert Harvest	100	100	250
Palo Verde Mesa	486	300	500
RE Crimson	450	329 ¹	644 ¹
Mule Mountain III	150	110 ¹	215 ¹
Blythe Mesa Solar Project	485	300	500
Column Total	3,106	2,495	4,564
Average for all Projects (per MW)		0.80	1.47

Note:

1 - Employment estimated by extrapolation from MW.

Project developers would likely seek to minimize the construction occurring during the hottest summer months and may therefore stagger their construction periods accordingly. Consequently, some seasonality may be expected to occur as developers favor more construction during the region’s cooler winter months. It is assumed that peak construction needs for each of the solar projects would be approximately evenly spread throughout the 48-month period for cumulative construction-related impacts. If all of the projects experienced their peak construction during the 48-month cumulative temporal scope, the regional labor need for a realistic “worst case condition” would be for four projects to have peak labor needs during the same winter season. Therefore, the equivalent of four average (400 MW) solar projects could experience peak construction at one time. This gives a peak cumulative solar workforce of approximately 2,400 workers, in addition to an average workforce for the other five solar projects (approximately 1,600 workers), for a total worst-case projection of 4,000 workers.

Because not all four of the cumulative solar projects would be under construction for the entire 48-month Project construction period, the actual cumulative construction workforce is expected to be lower. However, it is reasonable to assume that some of the other cumulative projects listed in Table 4.1-3 may begin construction in this time period. For this reason, a rounded winter-season peak of approximately 4,000 construction workers is used in this analysis. The Project’s maximum potential contribution to this cumulative effect would be approximately 20 percent during its own peak construction period. The Project’s average contribution to the cumulative impact would be approximately 11.25 percent during its non-peak construction.

Regional Labor Force Supply

As discussed previously, the total work force of skilled construction workers currently living in Riverside County is estimated to be approximately 72,017 (Table 3.15-4). Assuming that these workers are evenly distributed throughout Riverside County, the total construction work force within the geographic scope would be approximately 24 percent of this, or 17,284 workers. Although the population of skilled construction workers in the Riverside-San Bernardino- Ontario

MSA is expect to increase by approximately 5 percent by 2022 (Table 3.15-7), even if this level of growth occurred in the geographic scope, the cumulative labor force demand would still represent more than the region's currently forecasted future skilled construction labor force.

The current unemployment rate in Riverside County is estimated to be 6.3 percent (see Table 3.15-8). Applying this rate to the construction workers in the geographic scope yields an estimate of approximately 1,089 unemployed construction workers, which is fewer than the cumulative construction worker demand for the solar projects. Therefore, future demand for 4,000 construction workers would exceed the capacity of the current skilled labor force. Despite this need, and the possibility that many of the region's currently unemployed residents may lack transferable skills or have the physical aptitude to acquire the necessary skills required to serve the cumulative labor demand, many residents could be trained to be employable by these projects. Further, some of the construction work would be more entry-level positions which may be suitable for less skilled workers. Some of the regional workforce currently employed in other sectors also could have the capabilities to qualify for Project construction work. In such cases, some job transferring may occur, particularly because the construction jobs may be expected to be relatively well-paid and attractive for many local residents. The less skilled or desirable jobs vacated by individuals transferring to construction work could be filled by other less skilled unemployed residents. Therefore, there would be a demand for construction workers that would exceed the available labor supply within the geographic scope. It is assumed that those job positions would be filled by workers relocating into the region from beyond the geographic scope of the cumulative projects.

Housing and Lodging Impacts within the Local Study Area

Given the numerous variables discussed above, it is difficult to project the extent of future weekly commuting or other in-migration that would be necessary to meet the future cumulative labor needs within the region. However, as a conservative assumption, it is assumed that up to 4,000 construction workers could require temporary housing in the local or regional area.

The skilled construction labor force within the areas of Riverside County outside of the geographic scope is estimated to be approximately 54,733. This suggests that there is likely to be a considerable additional potential labor force available willing to commute weekly or to relocate temporarily to the area. Consequently, from a broader geographic and labor force perspective, no significant shortages of adequately skilled construction workers is foreseen, provided that adequate suitable housing is available for relocating near the work sites.

The cumulative influx in construction labor to the area could create demand for temporary housing that is greater than the existing supply of temporary lodging. As discussed in the previous construction impact analysis, private and public RV/campgrounds are not expected to be suitable or attractive lodging options for most construction workers seeking local accommodations. There are expected to be approximately 238 vacant rental units and 349 vacant hotel and motel rooms available in the local area. Assuming that about half of the construction workers might be willing to share accommodations to save on their lodging costs, the existing local rental units, hotels, and motels could be able to house up to 1,174 construction workers seeking local temporary housing. If these workers were willing to commute up to 2 hours to the site daily, the supply of vacant rental units (4,708) and hotel and motel rooms (4,334) increases substantially, potentially housing up to 9,042 construction workers, or more than double the number needed to temporarily house the approximately 4,000 construction workers that could move into the area as a result of the

cumulative projects. Because there is an ample supply of housing units to accommodate workers drawn from within the two hour commuting distance, the incremental effects of the Project, when considered together with other past, present, and reasonably foreseeable future projects, would not result in cumulatively significant, adverse impacts to housing supply during construction (impact SOC-4).

Irrespective of the availability of temporary housing, it may be expected that, even under future cumulative conditions, a relatively small proportion of construction workers would choose to relocate permanently to the local communities where they would be employed during construction. This is because many construction workers could choose to commute relatively long distances to their work sites and may expect to seek work within the more populated areas of Riverside and San Bernardino counties in the future.

Furthermore, during the same time period with the greatest potential for adverse impacts resulting from the cumulative demand for construction worker housing, there also would be a major positive economic stimulus to the Blythe area and eastern Riverside County economies associated with the solar development. This economic infusion could result in the construction or availability of additional rental/hotel units and so could offset a portion of the housing need-related impact.

In summary, there is potential for short-term adverse cumulative social and economic impacts in the Blythe area associated with the demand for skilled construction labor for the cumulative projects proposed for future development within eastern Riverside County. Analysis suggests that future construction labor demand would exceed the existing local work force within eastern Riverside County. Therefore, there may be increased demand for temporary local housing from construction workers seeking to commute weekly to the local area. Given the estimated availability of lodging and possible rental housing, it is expected that there could be a shortage of adequate and suitable housing to meet all future construction worker temporary housing demand. Therefore, adverse housing impacts could result if the cumulative demand for housing increased the price for local residents seeking housing. Economic impacts could also occur if hotel and motel vacancy rates fell such that rooms were not available for potential visitors to the area who would otherwise generate economic stimulus from vacation-related spending.

The Project would not displace existing housing (impact SOC-2) or people (impact SOC-3), so would not contribute to cumulative impacts to housing. The Project is not located in a Community Redevelopment Project area (impact SOC-5). The Project is not expected to induce population growth (impact SOC-1) or contribute to an exceedance of population projections (impact SOC-6).

Operations

If all of the cumulative projects are constructed, a total of 5,206 MW of solar power projects would operate concurrently. As shown in Table 4.15-4, the average solar project is estimated to require approximately 0.10 operational employees for each MW of solar power production.

Consequently, if full build-out of the planned solar development occurs, the future cumulative operational employment in the region would be approximately 573. The five operational jobs associated with the DQSP represent a contribution of approximately 0.9 percent to the cumulative operation- and maintenance-related need. Because the other cumulative projects for social and economic effects include an expanded electrical substation and transmission lines, it is not anticipated that these would add noticeably to the cumulative employment demand.

Table 4.15-4. Operational Employment for Existing and Future Solar Projects

Project	MW	Employees
Modified Blythe Solar Power Project	485	20
Desert Quartzite	450	5
Desert Sunlight	550	15
Genesis Solar Energy Project	250	65
McCoy Solar Energy Project	750	20
Palen Solar Project	500	134
Desert Harvest	150	8
Palo Verde Mesa	486	77
RE Crimson	450	72 ¹
Mule Mountain III	150	24 ¹
Blythe Mesa Solar Project	485	12
Column Total	4,706	493
Average for all Projects (per MW)		0.10

Note:

1 - Employment estimated by extrapolation from MW.

As shown in Table 3.15-4, there are 47,094 workers in the “Transportation, Warehousing & Utilities” industry group in Riverside County, for a total of approximately 11,302 workers within the geographic scope. Although not all workers in this category may possess the skills required for solar power plant operation and maintenance, the transferability of other skills, on-the-job and local community college training opportunities, and the lower skilled qualification requirements for some of the jobs suggest that there would be many others outside this category who would be able to meet the cumulative operational labor needs. Therefore, in the absence of more precise data on available skills, this industry group is used as the available labor pool for this analysis.

Based on current unemployment rates, it is assumed that approximately 712 of the 11,302 workers within the geographic scope would be available to meet operational labor needs.

Because there are an estimated 712 workers available, and a cumulative operations labor force of approximately 573 workers, there may be an in-migration of operational workers to meet the cumulative labor need. As described in Section 3.15.1.2, there are 238 vacant housing units for rent in the immediate area (i.e., Blythe and Ehrenberg). Estimates from the U.S. Census also show 146 homes for sale in the Blythe, Ehrenberg, and Quartzsite communities. Additionally, as shown in Table 4.1-3, there are a number of residential developments proposed in Blythe that could be expected to be built by the start of the solar power plants’ operation. Furthermore, the relatively limited number of new residents would not be expected to result in any noticeable change to the local communities’ social composition or character. The future operations of the solar projects would also generate significant annual economic benefits in local employment, direct and indirect spending at local businesses and positive sales and other tax benefits for the local area. Consequently, the cumulative social and economic effect of the future operations of the solar projects would be minor and primarily beneficial, although the increased demand for housing and

subsequent decrease in supply could increase housing prices in the local area, a potentially adverse effect for current residents or others seeking to move into the area.

Decommissioning

Evaluating the Project's cumulative impacts when future facility decommissioning occurs is highly speculative. Decommissioning is expected to occur after 30 years of operation. It is not possible to project with confidence the likely future social and economic conditions of the local and regional study area. Similarly, the extent to which the projects in the cumulative scenario would undergo decommissioning concurrently is unknown.

Nonetheless, Project decommissioning is expected to require a workforce similar to the construction phase, and the Project is expected to be one of many similar solar projects within eastern Riverside County. As such, its contribution to cumulative social and economic effects would be proportional to: (a) its size relative to the other development projects in the region; and (b) the collective size of projects undergoing decommissioning or construction at that time. Although the cumulative effects of construction were found to be potentially adverse based on a shortage of temporary housing, decommissioning would not likely overlap with as many projects as construction, and in over 30 years' time, based on regional population growth trends, it is likely that there would be more local workers and more temporary housing options available to accommodate decommissioning needs.

4.15.6.1.2 Social

Construction

The cumulative impact of the many proposed future solar and non-solar development projects in eastern Riverside County would result in considerable short-term construction activity at many locations throughout the region. As described previously, future cumulative demand for construction workers for these projects could exceed the available supply of skilled construction workers living in the region. In this case, construction workers from elsewhere could be attracted to the area by the construction employment opportunities.

The ongoing construction activity in the region, influx of construction workers both commuting daily to the site and those who could choose to temporarily live in the local area could noticeably alter the social character and environment within Blythe and the other local communities. An in-migration of 4,000 construction workers would be equivalent to approximately 17 percent of the total population of the Blythe, Ehrenberg, and Quartzsite communities and, consequently, would likely be very noticeable.

The potential influx of construction workers to the local area would be accompanied by an increase in economic activity from their spending in local business establishments. In addition, the planned new development projects would also make purchases from local businesses for construction materials and supplies and various kinds of services.

The effects of the increased activity on local attitudes and quality of life may vary among residents. While some residents may be displeased by increased traffic, new visitors and temporary residents (particularly those employed or otherwise benefiting economically from the construction) could welcome the development.

However, an influx of new workers also could increase the demand for certain kinds of government services and infrastructure (e.g., police and fire services and medical facilities and services). There have been other past instances of rapid growth in rural areas as a result of energy-related development, most notably the energy boom in the 1970s, in places like Wyoming, and the relatively recent shale oil boom in North Dakota. A number of communities, such as Rock Springs, Wyoming, and Watford City, North Dakota, became known as “boomtowns,” and the local economic benefits from the new energy development in the region were accompanied by some social changes that were not seen as positive by many existing residents. These included changes such as growth in number of bars, higher crime rates, and perceived (by some) aesthetic degradation due to rapid growth occurring to accommodate the sudden increase in population.

The presence of existing larger communities (such as Indio and Coachella) that are within possible commuting range for construction workers could suggest that circumstances may differ substantially from those facing the more isolated Wyoming and North Dakota boomtown communities in the past. However, there would remain a potential for temporary social impacts in the Blythe, Ehrenberg, and Quartzsite areas.

Operation and Maintenance

As discussed in the corresponding economic cumulative analysis, Project operation and maintenance would be expected to have a minor and beneficial effect on the local and eastern Riverside County economy. In the cumulative scenario, there may be an in-migration of solar plant operation and maintenance workers. There is likely to be more than sufficient available local housing to accommodate the housing needs of these workers and their families. Furthermore, the relatively limited number of new residents would not be expected to result in any noticeable change to the local communities’ social composition or character. The existence and operation of the solar projects themselves could result in changes to the character and culture of the area by converting open space, one of the primary land uses in eastern Riverside County, to solar plants. The PVVAP (Riverside County 2015b) notes that “The character of the area is reflected by the prominence of the Open Space-Rural and Agriculture land use designations here.” A reduction in the amount of open space in eastern Riverside County due to solar plant development could result in cultural changes to the area, such as reduced use of desert recreational opportunities and an altered sense of the character of the area relative to that described in the PVVAP. The future operations of the solar projects also would generate significant annual economic benefits in local employment, direct and indirect spending at local businesses, and positive sales and other tax benefits for the local area. The cumulative social and economic effect of the future operations of the solar projects would be minor and beneficial.

Decommissioning

As discussed in the corresponding economic cumulative analysis, there is insufficient information to reliably project the conditions when decommissioning of the proposed facilities would occur in 30 or more years into the future. Consequently, it would be speculative to try to characterize the future situation and circumstances under which facility decommissioning would occur. Similar to the economic cumulative analysis, it is anticipated that the effects from decommissioning could be of the same type and nature as those from construction, but would not likely be of the same magnitude.

4.15.6.2 Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

As discussed in Section 4.15.3.2, the construction spending and workforce requirements for Alternative 2 are expected to be similar to those of the Proposed Action, although the duration of construction may be shorter. Consequently, the contribution of Alternative 2 to a cumulative impact during construction and decommissioning would be less than the Proposed Action, because it would occur over a shorter time period.

4.15.6.3 Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

As discussed in Section 4.15.3.3, the construction spending and workforce requirements for Alternative 3 are expected to be similar to those of the Proposed Action, although the duration of construction may be shorter. Consequently, the contribution of Alternative 3 to a cumulative impact during construction and decommissioning would be less than the Proposed Action and Alternative 2, because it would occur over a shorter time period.

4.15.6.4 Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. The Project would not result in immigration of construction or operational workers, so would not contribute to adverse cumulative impacts associated with housing and social conditions. There would be no spending or tax revenues associated with the Project, so the Project would not contribute to a cumulative beneficial impact to economic conditions.

4.15.7 Residual Impacts

Because no mitigation measures are recommended, residual social and economic effects would be the same as discussed in Section 4.15.3.1, Alternative 1: Proposed Action.

4.16 Special Designations and Lands with Wilderness Characteristics

4.16.1 Methodology for Analysis

The analysis of the Proposed Action and alternatives assesses whether construction, operation, maintenance, and decommissioning of the Project would conflict with the status or management goals of the specially designated areas or lands with wilderness characteristics in the vicinity of the Project. These designations include Wilderness Areas, Areas of Critical Environmental Concern (ACECs), and a National Back Country Byway.

The analysis reviews the Project in relationship to the specific legislation and guidance which are required in the designation and management of Special Designations. These are: FLPMA, CDCA, NECA, the Wilderness Act of 1964, and the National Back Country Byways Program. Additional discussion related to impacts within special designation areas is found in Sections 4.3, *Biological Resources – Vegetation*; 4.4, *Biological Resources – Wildlife*; 4.10, *Lands, Realty, and Agricultural and Forestry Resources*, and 4.14, *Recreation and Public Access*.

The MUC class designations and some special designations were changed under the DRECP. Changes to Special Designations included modification of ACECs, designation of SRMAs and ERMAs, and designation of DFAs. As an application in the Riverside East SEZ filed before June 30, 2009, the DQSP is not, and will not be, subject to the terms of the DRECP. In addition, the analysis of the Project in this PA/EIS/EIR is based on the land use designations and visual resource classifications that were in effect on March 6, 2015, the date of the NOI, which do not include the newly designated ACECs and DFAs. A discussion of the differences between the CDCA Plan and the DRECP land use allocations, and their effect on the analysis of the Project in this PA/EIS/EIR, is presented in Appendix E.

4.16.1.1 CEQA Significance Criteria

There are no criteria listed in Appendix G of the CEQA Guidelines related to special designations (wilderness areas, ACECs, etc.). Criteria related to the designation of lands as farmland or forestland are included within Section 4.10, *Lands, Realty, and Agricultural and Forestry Resources*.

4.16.2 Applicant-Proposed Measures

There are no APMs proposed to address potential effects to special designations or lands with wilderness characteristics.

4.16.3 Direct and Indirect Impacts

4.16.3.1 Alternative 1: Proposed Action

Because the Project site itself is not subject to any special designation, the Proposed Action would have no direct impact on existing special designations or lands with wilderness characteristics in the Project vicinity, specifically Wilderness Areas, ACECs, and a National Back Country Byway. The Project may have indirect impacts on special designation areas if it has dust emissions, noise, or visual intrusions which would conflict with the status or management goals of the area.

As shown in Figure 3.16-1 and Table 3.14-1, 12 ACECs are within 20 miles of the Project area. Of these, 10 ACECs range in distance from 6 to 19 miles from the Project site, and would therefore not be affected by dust emissions, noise, or the visual appearance of the Project. The Mule Mountains ACEC is located approximately one mile southwest of the site, and could potentially be exposed to fugitive dust or noise generated by the Project. However, this ACEC was established to manage cultural resources, with the goal of protecting cultural values while providing for compatible public uses. While the analysis of noise impacts presented in Section 4.12 shows that noise from the construction of the Project may be noticeable to persons at this distance, noise would not have any effect on cultural resources within the ACEC, and would therefore not conflict with the status or management goals of the area. Similarly, fugitive dust in the form of PM₁₀ and PM_{2.5} may reach this area, but would not have any effect on cultural resources within the ACEC.

The closest ACEC designated for the protection of biological resources is the Mule-McCoy Linkage ACEC, which is oriented north-south approximately two miles west of the Project area. The Mule-McCoy Linkage ACEC is roughly coincident with the Chemehuevi to Chuckwalla Linkage, High Priority Colorado Desert Habitat, and Chuckwalla TCA shown in Figure 3.4-11, and was designated for the protection of these linkages. The Project does not overlie the ACEC, nor does it overlie any of the areas designated for protection of the Mojave desert tortoise or other species. As discussed in Section 4.6.1, the project is unlikely to adversely impact movement of wildlife within the ACEC.

As there are no Wilderness Areas or lands with wilderness characteristics within or adjacent to the Project area, there would be no direct impacts on Wilderness Areas or lands with wilderness characteristics from the Proposed Action. Similar to the ACECs, the Project could result in indirect impacts to Wilderness Areas or lands with wilderness characteristics through noise or air emissions. The closest Wilderness Area is the Palen-McCoy Wilderness Area, located approximately 7 miles northwest of the Project area. The closest lands with wilderness characteristics are located approximately 10 miles southwest of the Project site, on the other side of the Mule Mountains. Given the distance to these lands, it is unlikely that construction-related noise or air quality impacts could affect the wilderness characteristics of these areas.

As discussed in Sections 4.3, *Biological Resources – Vegetation*, and 4.4, *Biological Resources – Wildlife*, indirect effects to vegetation and wildlife could occur as a result of the spread of invasive species outside of the Project area. The Project does not propose to use off-site roads within lands with wilderness characteristics outside of the Project fence line, and would not introduce invasive species within these lands. Although the Project would create a movement barrier for large wildlife due to the exclusion fencing, within off-site lands with wilderness characteristics, the Project would have no effect on wildlife habitat connectivity. The Project would not indirectly affect the natural condition of these lands with wilderness characteristics. The Project area under the Proposed Action would also be consistent with the designation of the land area as a DFA under DRECP.

4.16.3.2 Alternative 2: Resource Avoidance Alternative

Similar to the Proposed Action, the land area associated with Alternative 2 is not a special designation area, so there would be no direct impacts. As with the Proposed Action, air emissions or noise from the Project could have an indirect impact on special designation areas, if such emissions or noise were to be detectable in the special designation area, and would conflict with

the status or management goals of the area. Because the land are associated with Alternative 2 is reduced from that of the Proposed Action, any air emissions or noise would be located at the same, or a reduced, distance from the Mule Mountains ACEC. Because the Proposed Action would not create a conflict with the status or management goals of this ACEC, neither would Alternative 2. The Project area under Alternative 2 would also be consistent with the designation of the land area as a DFA under DRECP.

4.16.3.3 Alternative 3: Reduced Project Alternative

Similar to the Proposed Action, the land area associated with Alternative 3 is not a special designation area, so there would be no direct impacts. As with the Proposed Action, air emissions or noise from the Project could have an indirect impact on special designation areas, if such emissions or noise were to be detectable in the special designation area, and would conflict with the status or management goals of the area. Because the land are associated with Alternative 3 is reduced from that of the Proposed Action and Alternative 2, any air emissions or noise would be located at the same, or a reduced, distance from the Mule Mountains ACEC. Because the Proposed Action would not create a conflict with the status or management goals of this ACEC, neither would Alternative 3. The Project area under Alternative 3 would also be consistent with the designation of the land area as a DFA under DRECP.

4.16.4 Application of CEQA Significance Thresholds

There are no criteria listed in Appendix G of the state CEQA Guidelines related to special designations as described in Section 3.16 (Wilderness Areas, ACECs, lands with wilderness characteristics, and a Back Country Byway). Criteria related to the designation of lands as farmland or forestland are included within Section 4.10 *Lands, Realty, and Agricultural and Forestry Resources*.

4.16.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.16 would be maintained. There would be no project developed within a special designation area, and no project which could indirectly impact a special designation area through air emissions or noise. Therefore Alternative 4 would not result in any impacts associated with special designation areas.

4.16.6 Cumulative Impacts

The Proposed Action, Resource Avoidance Alternative, and Reduced Project Alternative would have no impacts on special designations such as Wilderness Areas, ACECs, the National Back Country Byway, or lands with wilderness characteristics. Therefore, they would not cause or contribute to any cumulative impact to these areas.

4.16.7 Residual Impacts

Because no mitigation measures are recommended, impacts to special designations and lands with wilderness characteristics would be the same as discussed in Section 4.16.3.1, *Alternative 1: Proposed Action*.

4.17 Transportation and Traffic

4.17.1 Methodology for Analysis

This section evaluates the potential impacts of the Proposed Action and Alternatives on transportation and traffic. The analysis is based on the *Traffic Impact Analysis for the Desert Quartzite Solar Project* prepared by URS Corporation (2016), which has been independently reviewed on behalf of the BLM by its environmental consultant. The Traffic Impact Analysis evaluates impacts based on estimates of the amount of traffic that would be added to area roads during Project construction, operations, and decommissioning, as a result of commuting workers, delivery of Project materials, and potentially truck delivery of water for construction.

As discussed in Section 3.17, impacts to transportation systems were evaluated based on Level of Service (LOS) determinations, which is a generally accepted measure used by traffic engineers, planners, and decision-makers to describe and quantify the congestion level on a particular roadway or intersection based on specific characteristics of traffic flow. LOS determinations are made both on the roadway segments, and on the length of delay at intersections.

The LOS on roadway segments is based on the ratio of the traffic volume to capacity (V/C). The vehicular capacity is determined based on the physical and operational characteristics of the roadway, such as lane configuration and flow speed (typical speed along a roadway segment), and the volume is based on actual traffic counts (for existing conditions) or predicted traffic counts (for analysis of impacts). The V/C ratio is assigned a corresponding letter grade to represent the overall condition of the roadway or level of service. The LOS at intersections is based on observed average delay times, in seconds per vehicle. The grades range from LOS A (best operating conditions characterized by free-flow traffic, low volumes, and little or no restrictions on maneuverability) to LOS F (worst operating conditions characterized by forced traffic flow with high traffic densities, slow travel speeds, and often stop-and-go conditions).

The threshold for significance of impacts to transportation and traffic is generally based on the expected change in LOS. In their Guide for the Preparation of Traffic Impact Studies (Caltrans 2002), Caltrans endeavors to maintain a target LOS at the transition between LOS C and LOS D. The Riverside County Transportation Commission (RCTC) 2010 Congestion Management Program (CMP) establishes a minimum LOS of E for regional roadways and highways. The Riverside County General Plan (Riverside County 2015a) strives to maintain LOS C along County-maintained roads and state highways, with an exception that LOS D may be allowed within Community Development Areas at certain types of intersections.

4.17.1.1 CEQA Significance Criteria

The criteria used to determine the significance of the Project-related traffic and transportation impacts are based on the criteria identified in the state CEQA Guidelines, Appendix G. Project-related impacts would be considered significant if they would:

TRA-1) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

TRA-2) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

TRA-3) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

TRA-4) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

TRA-5) Result in inadequate emergency access.

TRA-6) Conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

The following additional significance criteria from the County of Riverside Environmental Assessment form are used in the analysis. A project could have potentially significant impacts if it would:

TRA-7) Alter waterborne, rail or air traffic.

TRA-8) Cause an effect, or a need for new or altered maintenance of roads.

TRA-9) Cause an effect upon circulation during the project's construction.

TRA-10) Affect bike trails.

4.17.2 Applicant-Proposed Measures

In their *Traffic Impact Analysis for the Desert Quartzite Solar Project* prepared by URS Corporation (2016), the Applicant proposed the following APMs to minimize impacts on Transportation and Traffic from the Project. The impact analysis in Section 4.17.3 assumes that these APMs would be implemented as part of the Project to address the impacts discussed below:

APM TRA-1: Worker Vehicle Reduction (Project Construction – PM Peak Hour)

In their *Traffic Impact Analysis for the Desert Quartzite Solar Project* (URS 2016b), the Applicant calculated that a maximum 650 construction worker vehicle threshold during the afternoon (PM) peak period was the threshold at which the LOS at the intersection of SR-78/16th Avenue would degrade from A to F. To address this impact, the Applicant would limit construction worker vehicles leaving the Project site between 4:00 PM to 6:00 PM to 650 vehicles, resulting in LOS D at the SR-78/16th Avenue intersection. This limitation would thereby reduce the PM peak hour construction impact, which would be caused by up to 810 construction worker vehicles leaving the Project site between 4:00 to 6:00 PM during the peak construction period.

In order to ensure that Project-related traffic levels do not exceed 650 passenger vehicles (or passenger car equivalents [PCE] considering one truck or bus is equivalent to 3 PCEs) departing the construction site during the PM peak traffic period of 4:00 to 6:00 PM, the Applicant would monitor and enforce construction traffic limits to avoid and minimize construction traffic impacts. Available traffic count and monitoring technology would be used to ensure construction traffic limits are met, and would be performed and logged using one or more of the following methods:

- Automatic Counts (Tube Counters, Radar Counters, Machine Vision)

- Video Recording with Manual Counting in the Office
- Manual Counts at the gate/entry point

The monitoring would be conducted during the peak construction months only when the traffic limits are needed. Assuming a 25-month construction period, the peak construction workforce months are currently anticipated to occur in the latter parts of the overall construction phase (e.g., Months 17-21). In the event that the 650 passenger vehicle limit is exceeded during the PM peak period of 4:00 to 6:00 PM, the Applicant would implement and document one or more of the following traffic reduction measures to reduce PM peak traffic to at or below the 650 passenger vehicle (or PCE) limit:

- Encourage carpooling at the level needed to achieve the needed reduction in traffic; and/or
- Arrange for busing to and from the site for the needed number of employees to get below the 650 passenger vehicle limit.

Based on the Applicant's experience on other similar projects, construction workers are expected to voluntarily carpool and thereby help reduce the likelihood that the 650 passenger vehicle limit would be exceeded during the peak construction period. In the event that the 650 passenger vehicle limit is found to be exceeded, the Applicant would further evaluate carpool options and/or busing. Although not anticipated, if necessary, off-site busing locations will be identified at that time. The results of the monitoring, as well as information on any remedial actions, would be provided to BLM and the County.

APM TRA-2: Traffic Monitoring and Control Plan

Prior to the Notice to Proceed, the Applicant would develop a standard traffic monitoring and control plan designed to minimize impacts to traffic flow consistent with the size and scope of Project construction. The plan would be submitted to BLM and the County for review and approval prior to the beginning of construction.

Proposed measures, where applicable, include but are not limited to the following:

1. Use proper signs and traffic control measures in accordance with Caltrans and Riverside County requirements. All traffic signs, equipment, and control measures shall conform to the provisions specified in the Caltrans Manual of Uniform Traffic Control Devices for Streets and Highways. Specific jurisdictional requirements will be identified during the plan review and approval process.
2. Schedule traffic lane or road closures during off-peak hours whenever possible (e.g., during construction at road crossings, culverts or any Project activity that may encroach in the traveled way). No traffic lane or off-site road closures are currently planned for the proposed Project.
3. Limit vehicular traffic to designated access roads, construction laydown and worker parking areas, and the Project construction site.
4. Provide orientation and briefing to employees and contractors on the desired construction route.
5. Encourage worker carpooling to minimize drive-alone worker trips.

Prior to construction, the Applicant would coordinate with the Riverside County Transportation Department to discuss road maintenance requirements and plans to ensure that road conditions along 16th Avenue/Seeley Avenue are kept safe for Project-related traffic to traverse, including potential adverse roadway conditions following infrequent storm events in the area.

As discussed in Section 4.1.6, the impact analysis assumes that the APMs have been implemented, and these measures are therefore requirements for approval of the Project. The APMs are to be incorporated into the EICMPP/MMRCP, along with the agency-required mitigation measures.

4.17.3 Direct and Indirect Impacts

4.17.3.1 Alternative 1: Proposed Action

The impacts to transportation and traffic that could occur from the Project include reducing the availability of parking; interference with bus, bicycle, or pedestrian facilities; direct disruption of traffic on existing roadways by construction activities; and indirect disruption of traffic through an increase in the number of vehicles. The Project is not located in an area with public parking facilities. Although parking and staging areas would be required for Project-related vehicles and equipment, these areas would be incorporated into the Project, and would be designed to accommodate the expected numbers of vehicles. Similarly, there are no public bus, bicycle, or pedestrian facilities in the area, so there would be no impact to these from the Project. These impacts are not discussed further.

The Project would involve closure of a land area that currently contains routes that are open to the public, as well as an increase in traffic volumes on area roads. These impacts are discussed in the following subsections.

Construction

Direct Impacts to Existing Project Site Routes and Roads

As discussed in Section 4.14, fencing of the Project area would eliminate public access to six open routes for the duration of the Project. These routes include all or portions of routes 660862, 660863, 660866, 661092, 661102, and 661501. Three of these routes provide access to the private property inholding (660862, 660866, and 661501) within the Project area and three routes provide access to the Mule Mountains (660863, 661092, and 661102). Access to the private property inholding would no longer be necessary, once it is incorporated into the Project. Use of the routes that provide access to the Mule Mountains is expected to be primarily recreational use by OHVs. With the closure of the three routes that access the Mule Mountains, alternative access to the Mule Mountains would occur by traveling west on 22nd Avenue to Gravel Pit Road, southwest along Gravel Pit Road, and then west on an unpaved extension of 24th Avenue to BLM routes 660863 and 661093. Although access via alternative routes may be slightly longer, access would not be eliminated. With the closure of the three routes that access the Mule Mountains, use of these routes would be displaced to other nearby routes that provide similar access. Due to the estimated low use of the routes within the Project area, there would be minimal impacts from displaced use.

Construction of the gen-tie line near the CRSS would not require access or closure of Power Line Road, a paved road owned and maintained by SCE to access the CRSS. Construction would occur only within the BLM ROW for the gen-tie line. Construction of the gen-tie may require temporary closure of route 660703, which is along an existing transmission line, to pull and string the gen-tie

line. Potential impacts would be reduced through implementation of APM TRA-2, as modified by Mitigation Measure TRN-1, which would require a Traffic Monitoring and Control Plan to limit impacts associated with temporary road closures. In addition, to reduce temporary impacts to access on this route, Mitigation Measure REC-2 (discussed in Appendix G, Section G.14) would require the Applicant to coordinate with BLM to temporarily close route 660703 if needed during construction and/or maintenance of the gen-tie line, and to post a public notice of the temporary route closure and penalties for any off-route OHV activities.

The Project access road, 16th Avenue/Seeley Avenue, would be used for up to 2,574 trips per day during construction, including 300 deliveries of construction material by truck, and 654 water deliveries by truck. Because the road is unimproved and would be subjected to intensive use by trucks, construction could result in degradation of the condition of the road to the extent that it could become unusable by emergency vehicles and current local users. To maintain the condition of the road, Mitigation Measure TRN-4 would require that the Applicant improve the segment between Neighbours Boulevard (State Route 78) and the site entrance, a length of approximately 5.6 miles, prior to beginning any other construction activities at the Project area.

Impacts due to Construction Traffic and Equipment

The analysis of impacts associated with construction traffic and equipment is based on the duration of construction, and magnitude of construction workers and vehicle trips, as discussed in Section 2.3.4.8. The analysis was calculated in PCE, to account for the greater impact that trucks have on traffic. Workers were assumed to commute in passenger cars, and the analysis assumed there would be no carpooling. Both construction deliveries and water deliveries were calculated assuming that one truck is equal to 3 PCEs.

The Applicant estimates that the construction workforce would average approximately 450 employees over the 25- to 48-month construction period, and would have a peak workforce of approximately 810 employees, resulting in an estimated maximum of 1,620 daily commuting trips. For purposes of a conservative estimate of traffic impacts, the Applicant assumed that the shortest construction duration, of 25 months, would apply.

Construction would also involve an estimated 300 daily trips by 50 vehicles to deliver materials to the Project site. The analysis assumed that 20 percent of these deliveries would occur during the peak morning hour, and the remainder would occur in non-peak traffic periods. In addition to truck deliveries of materials, truck deliveries of water for construction may be used. Although groundwater from on-site wells is the anticipated source for construction water needs, in the event an on-site source is not available, it may be necessary to truck water from an off-site source. If trucking water is required for the entire 25 month construction period, up to approximately 57,000 water truck deliveries (assuming 8,000 gallon capacity water trucks) could potentially be required. These trips are expected to originate within 10 miles of the Project site. The Applicant would require all water deliveries to occur during off-peak hours. Table 4.17-1 shows the number of trips that are estimated to occur in the peak month of construction.

Table 4.17-1. Estimated Number of Construction Trips in Peak Month

Category	Actual No. of Vehicles	Daily Trips (One-Way)	AM Peak Hours Trips (7:00 – 9:00 am)		PM Peak Hours Trips (4:00 – 6:00 pm)		Non-Peak Hours Trips	
			In	Out	In	Out	In	Out
Workers ¹	810	1,620	0	0	0	810	810	0
Construction deliveries ²	50	300 ²	30	30	0	0	120	120
Water truck deliveries ³	109	654 ³	0	0	0	0	327	327
Total	969	2,574	30	30	0	810	1,257	447

Source: URS 2016b

Notes:

- 1 – The Project would include 810 worker vehicles resulting 1,620 daily (in/out) one-way trips during the Peak Project Construction Months in the peak year. It is assumed that all the workers arrive at the Project site by 7:00 AM, thereby avoiding the 7:00–9:00 AM peak hours; 810 worker vehicles are assumed to depart the site at 5:00 PM during the 4:00–6:00 PM peak hours. The 810 worker vehicles estimate does not include consideration of carpooling.
- 2 - Construction deliveries were converted to Passenger Car Equivalent (PCE), assuming 1 truck equals to 3 passenger cars. During the Peak Project Construction Month, there are 50 (actual) trucks delivering on-site each day converted to 150 PCE resulting in 300 daily (combined in/out) one-way trips. It was assumed that up to 20 percent of the deliveries (60 trips) occur during the AM peak hours and the remaining deliveries are expected to occur during the non-peak traffic period (avoiding the 4:00– 6:00 PM peak hours).
- 3 - Water truck deliveries were converted to Passenger Car Equivalent (PCE), assuming 1 truck equals to 3 passenger cars. In the event that on-site groundwater is not available and trucking water to the Project site is necessary, there are an estimated 109 (actual) trucks delivering on-site each day converted to 327 PCE resulting in 654 daily (combined in/out) one-way trips. It was assumed that 100 percent of the water truck deliveries would occur during non-peak traffic periods (avoiding the 7:00–9:00 AM and 4:00–6:00 PM peak hour periods).

The majority of the construction workforce for the Project is expected to be drawn from the surrounding local and regional areas, including the Blythe and Indio areas (e.g., Coachella, Thermal, and Mecca), and the Arizona areas of Quartzite and Ehrenberg. Due to the length of the daily commute to the Project site from population centers, it is expected that the construction workers would be temporarily housed in either the Blythe or Indio areas, both of which have access to the Project area using I-10. The analysis assumed that approximately 80 percent of the construction traffic, including workers, equipment, and water, would access the Project area from the east, and approximately 20 percent would access the Project area from the west.

The peak year LOS for the intersections is presented in Table 3.17-1. The peak year shows that the intersections all operate at LOS A. The peak hour LOS conditions at the same intersections during construction are presented in Table 4.17-2.

Table 4.17-2 shows that, in the absence of APM TRA-1, the level of service at the SR-78/16th Avenue intersection would degrade to LOS F. As shown in Table 4.17-1, trips for deliveries of materials are assumed to occur during the AM peak hours, or during off-peak hours (i.e., the Applicant would schedule deliveries to avoid the PM peak hours). As a result, the impact identified in Table 4.17-2 is driven entirely by worker commuting vehicles, and is not affected by trips to deliver materials and equipment. As discussed in Section 4.17.2, APM TRA-1 would require the Applicant to control traffic leaving the Project area during the PM peak hours to a level that would

ensure the LOS at the SR-78/16th Avenue intersection would be LOS D or better. Mitigation Measure TRN-3 would modify the APM to further reduce the number of worker vehicles leaving the Project site during the PM peak hour, such that the intersection of SR-78/16th Avenue operates at LOS C or better. In addition, Mitigation Measure TRN-4 would require improvement of 16th Avenue/Seeley Avenue and paving the intersection of SR-78/16th Avenue to allow a turning lane from 16th Avenue onto SR-78. These improvements would facilitate traffic flow at the intersection, further improving the Level of Service.

Table 4.17-2. Peak Hour Intersection Level of Service in Peak Year Construction Conditions¹

Intersection	AM Peak Hour		PM Peak Hour	
	LOS	Average Delay (seconds per vehicle)	LOS	Average Delay (seconds per vehicle)
SR-78 (Neighbours Blvd)/I-10 WB ramps	A	9.7	A	9.2
SR-78 (Neighbours Blvd)/I-10 EB ramps	A	9.0	B	12.8
SR-78 (Neighbours Blvd)/14th Avenue	A	9.9	D	31.9
SR-78 (Neighbours Blvd)/16th Avenue	A	9.9	F	78.2

Source: URS 2016b

Note:

1 – Analysis assumes APM TRA-1 is not in place.

The peak year LOS for the four Project roadway segments in presented in Table 3.17-2. The peak year shows that the roadways (I-10, SR-78, and 16th Avenue) operate at LOS C. The LOS conditions for the roadway segments during construction are presented in Table 4.17-3.

Table 4.17-3. Roadway Segment Level of Service in Peak Year Construction Conditions

Roadway	Segment	Cross-section Classification	Peak Year + Project Construction Average Daily Traffic	Roadway Capacity	Truck Percent	LOS
I-10	West of Mesa	4-Lane Freeway	28,380	68,900	38%	C
I-10	East of SR-78	4-Lane Freeway	31,164	68,900	37%	C
SR-78	South of I-10	2-Lane	4,847	16,200	30%	C
16th Avenue	West of SR-78	2-Lane Collector	2,700	11,700	30%	C

Source: URS 2016b

Table 4.17-3 shows that, although traffic would increase, the LOS on the freeway and roadways would continue to operate at an acceptable level (LOS C) during Project construction. Although construction traffic would be more noticeable on local roads (e.g., SR-78 and 16th Avenue), the

increased traffic volumes would remain at levels less than the carrying capacity of these two-lane roads, which is approximately 12,000 to 16,000 vehicles per day. Because increases in traffic associated with Project construction activities would not be substantial relative to peak year conditions, the Project would not affect traffic conditions over the course of a workday. Furthermore, I-10 has sufficient capacity to accommodate Project construction-related traffic while maintaining acceptable LOS during the peak-hour periods.

Operations

Project operations would generate minimal traffic. As discussed in Section 2.3.5, Project operation and maintenance activities are expected to require approximately 5 permanent, full-time personnel who would operate in two 12-hour shifts, resulting in 10 commuting trips per day. An estimated 10 trips per day would occur for the delivery of materials. Additional workers may be onsite during ad-hoc activities, such as panel washing. The number of additional trips associated with these activities is expected to be minimal and would not have an adverse impact on transportation and traffic.

As with construction, operation and maintenance of the gen-tie line may also periodically necessitate the temporary closure of route 660703. Because route 660703 is an open route, temporary closure of the route would affect OHV and other users. Potential impacts would be reduced through implementation of APM TRA-2, as modified by Mitigation Measure TRN-1, which would require a Traffic Monitoring and Control Plan to limit impacts associated with temporary road closures. To further reduce temporary impacts to access on this route, Mitigation Measure REC-2 would require the Applicant to coordinate with BLM to temporarily close route 660703 if needed during maintenance of the gen-tie line.

Decommissioning

Similar to construction, decommissioning of most of the Project facilities would occur almost entirely onsite, and would not affect any roads other than the six open BLM routes that would be closed for the entire duration of the Project. As with construction, decommissioning of the gen-tie line may also necessitate the temporary closure of route 660703. Because route 660703 is an open route, temporary closure of the route would affect OHV and other users. Potential impacts would be reduced through implementation of APM TRA-2, as modified by Mitigation Measure TRN-1, which would require a Traffic Monitoring and Control Plan to limit impacts associated with temporary road closures. To further reduce temporary impacts to access on this route, Mitigation Measure REC-2 would require the Applicant to coordinate with BLM to temporarily close route 660703 if needed during maintenance of the gen-tie line.

As discussed in Section 2.3.6, decommissioning of the Project is expected to take up to a year to complete and require a workforce smaller than that associated with construction. For purposes of this analysis, it is assumed that the commuting workforce and number of truck trips is approximately half of the number associated with construction. Because the number of workers and trucks required during Project decommissioning activities would be less than what was required during the peak construction period in the peak year, increased traffic during decommissioning would have less effect on traffic conditions than during peak construction, and traffic flow at the intersections and roadways would operate at acceptable conditions during decommissioning.

4.17.3.2 Alternative 2: Resource Avoidance Alternative

Construction, Operations, and Decommissioning

Because the workforce and number of equipment trips for construction, operation, and decommissioning of Alternative 2 would be the same as that for the Proposed Action, daily worker commuting and haul truck trip volumes are also anticipated to be the same. Therefore, the impact of Alternative 2 on the LOS for roadways and intersections would be the same as the Proposed Action.

In the absence of APM TRA-1, the level of service at the SR-78/16th Avenue intersection would degrade to LOS F under Alternative 2. As discussed in Section 4.17.2, the Applicant proposes to control traffic leaving the Project area during the PM peak hours to a level that would ensure the LOS at the SR-78/16th Avenue intersection would be LOS D or better. Mitigation Measure TRN-3 would modify APM TRA-1 to further reduce the number of construction worker vehicles leaving the Project site during the PM peak hour, such that the intersection of SR-78/16th Avenue operates at LOS C or better. In addition, Mitigation Measure TRN-4 would require improvement of 16th Avenue/Seeley Avenue and paving the intersection of SR-78/16th Avenue to allow a turning lane from 16th Avenue onto SR-78. These improvements would facilitate traffic flow at the intersection, further improving the Level of Service.

4.17.3.3 Alternative 3: Reduced Project Alternative

Construction, Operations, and Decommissioning

The workforce for construction, operation, and decommissioning of Alternative 3 would be the same as that of the Proposed Action. The total number of trips required to deliver materials and equipment for construction would be 10,800, lower than the 14,400 total trips required for the Proposed Action and Alternative 2. As discussed in Section 4.17.3.1, the adverse impact of construction traffic at intersection of SR-78 and 16th Avenue is driven entirely by worker commuting vehicles, and is not affected by trips to deliver materials and equipment. Therefore, although the reduction in delivery trips by about three-quarters would reduce impacts at the intersections, the adverse impact associated with commuting workers in the PM peak hours would still result in lowering the level of service to LOS F at the SR-78 intersection with 16th Avenue under Alternative 3. As discussed in Section 4.17.2, the Applicant proposes to control traffic leaving the Project area during the PM peak hours to a level that would ensure the LOS at the SR-78/16th Avenue intersection would be LOS D or better. Mitigation Measure TRN-3 would modify APM TRA-1 to further reduce the number of construction worker vehicles leaving the Project site during the PM peak hour, such that the intersection of SR-78/16th Avenue operates at LOS C or better. In addition, Mitigation Measure TRN-4 would require improvement of 16th Avenue/Seeley Avenue and paving the intersection of SR-78/16th Avenue to allow a turning lane from 16th Avenue onto SR-78. These improvements would facilitate traffic flow at the intersection, further improving the Level of Service.

4.17.4 Application of CEQA Significance Thresholds

TRA-1) Would the Project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account

all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

As shown in Table 4.17-2, construction of Alternatives 1 or 2 would result in operation of the intersection of SR-78 and 16th Avenue at a LOS F during peak PM hours, in the absence of APMs. This reduction in LOS would exceed the thresholds established in the Riverside County CMP and Riverside County General Plan, and would constitute a significant impact. Implementation of APM TRA-1 would reduce the number of vehicles leaving the Project to a level that allows the intersection of SR-78 and 16th Avenue to operate at LOS D. The measure would also improve the LOS at the intersection of SR-78 and 14th Avenue. However, even with implementation of APM TRA-1, the Project would result in LOS D, which would still not comply with the Riverside County General Plan target of LOS C along County-maintained roads and state highways. According to the Riverside County Traffic Impact Analysis Preparation Guide (Riverside County 2008), when Project traffic, added to existing traffic, will deteriorate the LOS to below the target LOS, and impacts are not mitigated, the impact is considered significant. Mitigation Measure TRN-3 would modify APM TRA-1 to further reduce the number of construction worker vehicles leaving the Project site during the PM peak hour, such that the intersection of SR-78/16th Avenue operates at LOS C or better. In addition, Mitigation Measure TRN-4 would require improvement of 16th Avenue/Seeley Avenue and paving the intersection of SR-78/16th Avenue to allow a turning lane from 16th Avenue onto SR-78. These improvements would facilitate traffic flow at the intersection, further improving the Level of Service. With implementation of Mitigation Measures TRN-3 and TRN-4, the intersection would conform to the thresholds established in the Riverside County CMP and Riverside County General Plan, and impacts of Alternative 1 or Alternative 2 would be less than significant.

The total number of trips required to deliver materials and equipment for construction of Alternative 3 would be 10,800, lower than the 14,400 total trips required for Alternative 1 and Alternative 2. However, the number of workers would be the same, and therefore the impacts of commuting vehicles on traffic would be the same as that of the Proposed Action. As discussed in Section 4.17.3.1, the adverse impact of construction traffic at intersection of SR-78 and 16th Avenue is driven entirely by worker commuting vehicles, and is not affected by trips to deliver materials and equipment. Therefore, although the reduction in delivery trips by about three-quarters would reduce overall impacts at the intersections, the adverse impact associated with commuting workers in the PM peak hours would still result in lowering the level of service to LOS F at the SR-78 intersection with 16th Avenue under Alternative 3. Even with implementation of APM TRA-1, Alternative 3 would result in LOS D, which would still not comply with the Riverside County General Plan target of LOS C along County-maintained roads and state highways. According to the Riverside County Traffic Impact Analysis Preparation Guide (Riverside County 2008), when Project traffic, added to existing traffic, will deteriorate the LOS to below the target LOS, and impacts are not mitigated, the impact is considered significant. Mitigation Measure TRN-3 would modify APM TRA-1 to further reduce the number of construction worker vehicles leaving the Project site during the PM peak hour, such that the intersection of SR-78/16th Avenue operates at LOS C or better. In addition, Mitigation Measure TRN-4 would require improvement of 16th Avenue/Seeley Avenue and paving the intersection of SR-78/16th Avenue to allow a turning lane from 16th Avenue onto SR-78. These improvements would facilitate traffic flow at the intersection, further improving the Level of Service. With implementation of Mitigation Measures TRN-3 and TRN-4, the intersection would conform to the

thresholds established in the Riverside County CMP and Riverside County General Plan, and impacts would be less than significant.

The impact of construction of Alternatives 1, 2, or 3 on traffic at the other three intersections, and on 16th Avenue, SR-78, and I-10 roadway segments, would be less than significant because they would all operate at LOS C or better.

The impacts of operation of Alternatives 1, 2, 3 are expected to be nominal, and the impacts of decommissioning on traffic would be less than those associated with construction. Alternatives 1, 2, or 3 construction and decommissioning would not have long-term significant traffic impacts on the transportation network, since construction- and decommissioning-related impacts are considered temporary.

TRA-2) Would the Project conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

The RCTC's adopted minimum LOS threshold is LOS E. When a CMP street or highway segment falls to LOS F, a deficiency plan would be required. As shown in Table 4.17-2, construction of Alternatives 1, 2, or 3 would result in operation of the intersection of SR-78 and 16th Avenue at a LOS F during peak PM hours, in the absence of APMs. This reduction in LOS would exceed the thresholds established in the Riverside County CMP, and would constitute a significant impact. However, implementation of APM TRA-1 would reduce the number of vehicles leaving the Project in the afternoon peak hours to a level that allows the intersection to operate at LOS D. With implementation of this APM, the impact on the intersection would not conflict with an applicable congestion management program established by the County congestion management agency for designated roads or highways, and impacts of Alternative 1, 2, or 3 would be less than significant. The impact of Alternatives 1, 2, or 3 operation on traffic at the other three intersections, and on 16th Avenue, SR-78, and I-10 roadway segments, would also be less than significant because they would all operate at LOS D or better.

The impact of Alternatives 1, 2, or 3 operation on traffic would be nominal and Project decommissioning would result in less traffic impacts than Project construction. Therefore, impacts of Alternatives 1, 2, or 3 operations and decommissioning would be less than significant.

TRA-3) Would the Project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Alternatives 1, 2, or 3 would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. Construction equipment that would be utilized for Alternatives 1, 2, or 3 would not obstruct navigable air space. No impacts would occur.

TRA-4) Would the Project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Alternatives 1, 2, or 3 would not require modification of roadways or intersections, or incompatible uses of the public roadways. No impacts would occur.

TRA-5) Would the Project result in inadequate emergency access?

Because 16th Avenue/Seeley Avenue is unimproved and would be subjected to intensive use by trucks, construction could result in degradation of the condition of the road to the extent that it could become unusable by emergency vehicles under Alternatives 1, 2, and 3, resulting in significant impacts to emergency access. To maintain the condition of the road, Mitigation Measure TRN-4 would require that the Applicant improve the segment between Neighbours Boulevard (State Route 78) and the site entrance, a length of approximately 5.6 miles, prior to beginning any other construction activities at the Project area.

The only potential road closure associated with Alternatives 1, 2, or 3 would be temporary closure of route 660703, which is along an existing transmission line, to pull and string the gen-tie line. Because temporary closure of the route could affect emergency access, Mitigation Measure REC-2 would require that the Applicant coordinate the closure with applicable emergency response agencies.

There would be two access routes to the Project area. Primary access for construction and operations would be from Exit 236 off of I-10, following SR-78 and 16th Avenue/Seeley Avenue to the facility gate. A secondary access route would be from 22nd Avenue. The Applicant's Hazardous Materials Management and Emergency Response Plan would comply with applicable Riverside County regulations, and would be coordinated with the Riverside County Fire Department. With improvement of the access road, as required through Mitigation Measure TRN-4, and coordination of route closures, as required through Mitigation Measure REC-2, impacts to emergency access under Alternatives 1, 2, or 3 would be less than significant.

TRA-6) Would the Project conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Alternatives 1, 2, or 3 would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. There are no bicycle or pedestrian facilities in the Project area. Due to the remote location of the Project, bicycling and walking are not major means of transportation, and substantial bicycle or pedestrian use is not projected in the future. Accordingly, Alternatives 1, 2, or 3 would not interfere with bicycle or pedestrian safety.

As shown in Table 4.17-2, construction traffic from Alternatives 1, 2, or 3 would increase delays at intersections on SR-78 (Neighbours Boulevard), which is used as a bus route by the Palo Verde Valley Transit Agency (PVVTA). The additional delay for buses at these intersections would be nominal (around 30 seconds). Therefore, impacts to public transit under Alternatives 1, 2, or 3 would be less than significant.

TRA-7) Would the Project alter waterborne, rail or air traffic?

Alternatives 1, 2, or 3 would not alter waterborne, rail, or air traffic. The Project would not utilize waterborne, rail, or air services to transport materials or the workforce. Therefore, no impacts to waterborne, rail or air traffic would occur.

TRA-8) Would the Project cause an effect, or a need for new or altered maintenance of roads?

As discussed in Section 4.17.3, construction traffic under Alternatives 1, 2, or 3 would cause degradation of 16th Avenue/Seeley Avenue, and could result in making the roadway unpassable for emergency vehicles or local traffic. Such degradation could be significant, requiring increased maintenance for the existing roadway, or construction of new roadway. To maintain the condition of the road, Mitigation Measure TRN-4 would require that the Applicant improve the segment between Neighbours Boulevard (State Route 78) and the site entrance, a length of approximately 5.6 miles, prior to beginning any other construction activities at the Project area. With improvement of the access road, as required through Mitigation Measure TRN-4, impacts associated with the need for new roads or increased maintenance of existing roads under Alternative 1, Alternative 2, or Alternative 3 would be less than significant.

Closure of the current access routes to the Mule Mountains could result in increased use, and therefore degradation, of the alternative access roads south and west of the Project area. To ensure that this alternative access is accessible and known to persons wishing to access the area, Mitigation Measure REC-1 requires that the Applicant perform light clearing and grading prior to Project construction, and then periodically as needed during construction, operations, and decommissioning. With maintenance of this alternative access, as required by REC-1, impacts would be less than significant.

TRA-9) Would the Project cause an effect upon circulation during the project's construction?

As shown in Table 4.17-2, construction of Alternatives 1, 2, or 3 would result in operation of the intersection of SR-78 and 16th Avenue at a LOS F during peak PM hours, in the absence of APMs. Implementation of APM TRA-1 would reduce the number of vehicles leaving the site to a level that allows the intersection of SR-78 and 16th Avenue to operate at LOS D. The measure would also improve the LOS at the intersection of SR-78 and 14th Avenue. However, even with implementation of APM TRA-1, Alternatives 1, 2, or 3 would result in LOS D, which would still not comply with the Riverside County General Plan target of LOS C along County-maintained roads and state highways. According to the Riverside County Traffic Impact Analysis Preparation Guide (Riverside County 2008), when Project traffic, added to existing traffic, will deteriorate the LOS to below the target LOS, and impacts are not mitigated, the impact is considered significant. Mitigation Measure TRN-3 would modify APM TRA-1 to further reduce the number of construction worker vehicles leaving the Project site during the PM peak hour, such that the intersection of SR-78/16th Avenue operates at LOS C or better. In addition, Mitigation Measure TRN-4 would require improvement of 16th Avenue/Seeley Avenue and paving the intersection of SR-78/16th Avenue to allow a turning lane from 16th Avenue onto SR-78. These improvements would facilitate traffic flow at the intersection, further improving the Level of Service. With implementation of Mitigation Measures TRN-3 and TRN-4, the intersection would conform to the thresholds established in the Riverside County CMP and Riverside County General Plan, and impacts would be less than significant.

The impact of Alternative 1, 2, or 3 construction on traffic at the other three intersections, and on 16th Avenue, SR-78, and I-10 roadway segments, would be less than significant because they would all operate at LOS C or better.

The impacts of Alternative 1, 2, or 3 operations are expected to be nominal, and the impacts of decommissioning on traffic would be less than those associated with construction. Alternatives 1, 2, or 3 construction and decommissioning would not have long-term significant traffic impacts on the transportation network, since construction- and decommissioning-related impacts are considered temporary.

TRA-10) Would the Project affect bike trails?

There are no bike trails in the Project area. Therefore, there would be no impact under Alternatives 1, 2, or 3.

4.17.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.17 would be maintained. There would be no increase in traffic associated with commuting workers, delivery of materials, or delivery of water, and no impacts to existing on-site routes. Therefore, Alternative 4 would not result in any impacts to transportation and traffic.

4.17.6 Cumulative Impacts

For the purposes of the cumulative analysis of transportation and traffic impacts, only other projects that make or would make a substantial contribution to traffic at the same roadway intersections or segments as the Proposed Action or alternatives are considered.

With respect to the impacts to the I-10 freeway segments, the geographic scope of the cumulative analysis is all projects in eastern Riverside County. Traffic could be affected by any of the projects listed in Tables 4.1-1 and 4.1-2, all of which would involve commuting workers and delivery of materials using I-10 for their primary access. In general, it is only the construction and decommissioning phases of these projects that would have the potential to contribute to cumulative traffic impacts, because the numbers of workers and deliveries associated with operations is nominal compared to the overall traffic volume on I-10. The contribution of operations to traffic impacts is already accounted for in the projected peak year baseline, which assumed a two percent growth per year in ambient conditions. However, the impacts of construction and decommissioning traffic could contribute to adverse cumulative impacts.

With respect to traffic on the SR-78 and 16th Avenue roadway segments, and at the intersections of 14th Avenue and 16th Avenue with SR-78, the geographic scope of the cumulative analysis is limited to the projects that would make a substantial contribution to traffic south of I-10. Based on a review of the geographic distribution of the cumulative projects in Figure 4.1-1, the only cumulative project that is likely to use SR-78 south of I-10 to support construction, operations, or decommissioning is the BMSP. The other cumulative projects are either located north of I-10, or are located closer to other exits on I-10 rather than the SR-78 exit, and would therefore contribute only minimally to traffic on SR-78 or 16th Avenue south of I-10. Again, because the number of operations workers and deliveries for both the DQSP and BMSP are nominal when compared to

the overall volume of traffic on SR-78, the two projects would only contribute to an adverse cumulative impact if their construction and/or decommissioning phases were to be concurrent. The contribution to traffic impacts from operations of these two projects is already accounted for in the projected peak year baseline, which assumed a two percent growth per year in ambient conditions.

With respect to traffic at the intersections (exit ramps) of SR-78 with I-10, the geographic scope of the cumulative analysis is limited to the projects that would use SR-78 for access, either north or south of I-10. Based on a review of the geographic distribution of the cumulative projects in Figure 4.1-1, this is expected to include the BMSP, the Blythe Airport, MSEP, Blythe Airport Solar I Project, Palo Verde Mesa Solar Project, and the Modified BSPP. The other cumulative projects are located closer to other exits on I-10 rather than the SR-78 exit, and would therefore contribute only minimally to traffic at the intersection of SR-78 with I-10. Again, because the number of operations workers and deliveries for these projects are nominal when compared to the overall volume of traffic using the SR-78 interchange with I-10, the projects would only contribute to an adverse cumulative impact if their construction and/or decommissioning phases were to be concurrent. The contribution to traffic impacts from operations of these projects is already accounted for in the projected peak year baseline, which assumed a two percent growth per year in ambient conditions.

The projects listed in Table 4.1-2 have been implemented. Some of these projects existed previously, but are now closed (such as the Kaiser Mine), so they do not contribute to cumulative traffic impacts. Those that are currently in operation contribute ongoing operational traffic to area roadways and intersections. This traffic is already accounted for in the cumulative analysis because it contributes to the existing conditions, and in the projected peak year baseline, discussed in Section 3.17. Because the system is currently operating at an acceptable LOS, and is projected to operate at an acceptable LOS in the peak year, the existing projects do not conflict with established standards of performance of the vehicle circulation system in the area, and have not resulted in cumulatively adverse conditions.

Table 4.1-3 provides a list of reasonably foreseeable projects, including other proposed or approved renewable energy projects, various BLM-authorized actions/activities, proposed or approved projects within the County's jurisdiction, and other actions/activities that are considered reasonably foreseeable. The renewable energy and other infrastructure projects would contribute traffic to area roadways and intersections during their own construction, operations, and decommissioning phases.

Alternative 1 – Proposed Action

Construction and Decommissioning

I-10 Freeway Segment

As shown in Tables 3.17-2 and 4.17-3, Project construction would increase the average daily traffic on I-10 east of SR-78 from the peak year base of 29,700 to 31,164, as compared to a roadway capacity of 68,900. The change in traffic on I-10 west of Mesa Drive would be even smaller, from the peak year base of 28,080 to 28,380. An increase in traffic would also be associated with decommissioning of the DQSP, but the increase from decommissioning would be less than the increase associated with construction. As discussed in Section 4.17.3.1, these increases would not result in changing the LOS on this segment from its current LOS C.

Operational levels of traffic from the other projects would be nominal, and also would not result in changing the LOS from C to D. However, concurrent construction and/or decommissioning of other large-scale projects in the I-10 corridor could potentially increase traffic levels to result in LOS D or lower, which would be a significant impact. Although the construction and decommissioning period, workforce, and schedule for the majority of foreseeable future projects are generally unknown, in a worst-case scenario where construction and/or decommissioning peak periods overlapped for all projects proposed in the Project area, the LOS of I-10 could be temporarily degraded, but would not result in any permanent LOS degradation. Given the large difference between the capacity of I-10 and the peak year base average daily traffic (40,520), even a worst-case scenario would not likely exceed the capacity of I-10, which in this area has two lanes in both directions to accommodate the anticipated increase in traffic while maintaining adequate traffic flow along the freeway mainline.

SR-78 Roadway and Intersections

As shown in Tables 3.17-2 and 4.17-3, Project construction would increase the average daily traffic on SR-78 from the peak year base of 2,273 to 4,847, as compared to a roadway capacity of 16,200. The change in traffic on 16th Avenue would be from the peak year base of 126 to 2,700, as compared to a capacity of 11,700. In both cases, the increase would not result in a change of the peak year base LOS C. However, at the intersection of 14th Avenue with SR-78, the PM peak hour average delay would increase from 9.9 to 31.9 seconds/vehicle without mitigation, which would result in a change from the peak year base of LOS A to LOS D. At the intersection of 16th Avenue with SR-78, the PM peak hour average delay would increase from 9.8 to 78.2 seconds/vehicle without mitigation, which would result in a change from the peak year base of LOS A to LOS F, which would constitute a significant impact. Implementation of APM TRA-1 would reduce the number of vehicles leaving the Project during the afternoon peak hours to a level that allows the intersection to operate at LOS D, and would reduce the direct impact of the DQSP on this intersection. Mitigation Measure TRN-3 would modify APM TRA-1 to further reduce the number of construction worker vehicles leaving the Project site during the PM peak hour, such that the intersection of SR-78/16th Avenue operates at LOS C or better. In addition, Mitigation Measure TRN-4 would require improvement of 16th Avenue/Seeley Avenue and paving the intersection of SR-78/16th Avenue to allow a turning lane from 16th Avenue onto SR-78. These improvements would facilitate traffic flow at the intersection, further improving the Level of Service. An increase in traffic at this interchange would also be associated with decommissioning of the DQSP. The increase in traffic from decommissioning would be lower than that associated with construction, but could still result in an unacceptable reduction in LOS at the intersection of 16th Avenue and SR-78.

Operational levels of traffic from the BMSP would be nominal, and would likely not result in a further reduction of the LOS at these locations. However, concurrent construction and/or decommissioning of the DQSP and BMSP could potentially increase traffic levels on SR-78 and 16th Avenue to result in LOS D or lower, and would also result in even longer average delays at the intersections. Even with implementation of APM TRA-1, construction or decommissioning traffic from the DQSP would be a considerable contributor to cumulative traffic impacts. Although the construction and decommissioning period, workforce, and schedule for the BMSP is not known, in a worst-case scenario where construction and/or decommissioning peak periods overlapped for DQSP and BMSP, the LOS of SR-78 and 16th Avenue could be temporarily degraded, but would not result in any permanent LOS degradation. Given the large difference

between the capacity of SR-78 and 16th Avenue and the peak year base average daily traffic, even a worst-case scenario would not likely exceed the capacity of either roadway segment. However, the increase in the average delay associated with the DQSP is already a significant impact, and would be made even worse when combined with construction or decommissioning traffic from BMSP.

I-10/SR-78 Interchange

As shown in Tables 3.17-1 and 4.17-2, the contribution of construction traffic from DQSP would have only a minor effect on the average delay at the eastbound and westbound ramps to I-10. The AM peak hour average delay at the westbound ramp would increase from 9.2 to 9.7 sec/veh, but the LOS would remain at the peak year base of LOS A. The PM peak hour average delay at the eastbound ramp would increase from 9.4 to 12.8 sec/veh, which would result in a change from the peak year base of LOS A to LOS B, which would be a less than significant impact.

Operational levels of traffic from the other projects would be nominal, and likely would not result in changing the LOS lower than LOS B. However, concurrent construction and/or decommissioning of the DQSP and the other projects which use SR-78 for access could potentially increase traffic levels at the interchange to result in LOS D or lower, which would be a significant impact. Although the construction and decommissioning period, workforce, and schedule for the other projects is not known, in a worst-case scenario where construction and/or decommissioning peak periods overlapped for DQSP and the other projects, the LOS of the interchange could be temporarily degraded, but would not result in any permanent LOS degradation.

Summary

The DQSP is not expected to be a considerable contributor to cumulatively significant traffic impacts on the I-10, SR-78, or 16th Avenue roadway segments. I-10 west and east of SR-78 would operate at LOS C, and SR-78 and 16th Avenue would operate at LOS A. With the construction of the cumulative projects and DQSP, it is anticipated that the freeway would operate within Caltrans' acceptable LOS level.

The Project would contribute to traffic impacts at the SR-78 interchange with I-10. Impacts of the Project itself would be significant without mitigation, and the magnitude of the cumulative impact would depend on how many projects were undergoing concurrent construction or decommissioning. If enough projects are undergoing construction or decommissioning to result in a cumulatively considerable traffic impact at the interchange, the DQSP would be a contributor, but would not likely be a considerable contributor, to the cumulative traffic impact.

On its own, without mitigation, Project construction would cause significant traffic impacts at intersections of 14th Avenue and 16th Avenue with SR-78. These impacts would be reduced through implementation of APM TRA-1, which would reduce the number of vehicles leaving the Project to a level which allows the intersections to operate at LOS D or better. However, impacts at the 16th Avenue intersection would still be significant. Mitigation Measure TRN-3 would modify APM TRA-1 to further reduce the number of construction worker vehicles leaving the Project site during the PM peak hour, such that the intersection of SR-78/16th Avenue operates at LOS C or better. In addition, Mitigation Measure TRN-4 would require improvement of 16th Avenue/Seeley Avenue and paving the intersection of SR-78/16th Avenue to allow a turning lane from 16th Avenue onto SR-78. These improvements would facilitate traffic flow at the intersection, further improving the Level of Service. With implementation of Mitigation Measures TRN-3 and TRN-

4, the intersection would conform to the thresholds established in the Riverside County CMP and Riverside County General Plan, and impacts would be less than significant. If the BMSP should undergo concurrent construction, the cumulative impact at these intersections would likely be significant, even with implementation of APM TRA-1 and Mitigation Measure TRN-3 and TRN-4, and the DQSP would be a considerable contributor to these cumulative traffic impacts.

APM TRA-1 and Mitigation Measures TRN-3 and TRN-4 would reduce the Project's construction-related contribution to cumulative traffic impacts. Based on the short-term nature of construction, any increase in vehicle trips and transportation-related impacts would be temporary. However, even with implementation of the APMs during construction of the Project, implementation of a Coordinated Transportation Management Plan is recommended to reduce the Project's contribution to any potential traffic impacts to the surrounding network. With implementation of BMPs and mitigation measures, impacts to traffic and transportation would be minimized. Implementation of Mitigation Measure TRN-2, Coordinated Transportation Management Plan, would require the Applicant to address the transportation impact of the multiple overlapping construction projects within the vicinity of the Project in the region. TRN-2 would also require the Applicant to develop and implement protocols for updating the Coordinated Transportation Management Plan to account for delays or changes in the schedules of individual projects. With implementation of Mitigation Measure TRN-2, cumulative traffic impacts to the intersections would likely be improved to acceptable LOS levels. Therefore, the Project's contribution towards temporary, significant cumulative impacts during Project construction would be reduced to a level that is less than significant.

The Project would not result in a change to air traffic patterns (impact TRA-3), would not affect emergency access (impact TRA-5), would not affect public transit (impact TRA-6), would not affect waterborne, rail, or air transportation (impact TRA-7), and would not affect bike trails (impact TRA-10). The Project would not have design features which would increase hazards (impact TRA-4) on existing roads.

Operation and Maintenance

As discussed in Section 4.17.3.1, Project operations would generate minimal traffic. Project operation and maintenance activities are expected to require approximately 5 permanent, full-time personnel who would operate in two 12-hour shifts, resulting in 10 commuting trips per day. An estimated 10 trips per day would occur for the delivery of materials. Additional workers may be onsite during ad-hoc activities, such as washing of panels, but the number of additional trips associated with these activities is expected to be minimal. Overall, operations of the DQSP are expected to add fewer than 20 daily trips to a roadway (16th Avenue) which would have an estimated 126 trips during the peak year base, as compared to a capacity of more than 11,000 vehicles. Even if concurrent projects contributed traffic to the roadway segments and intersections to the extent that a cumulatively significant impact would occur, the contribution of the Project to that impact would not be cumulatively considerable.

Alternative 2 – Resource Avoidance Alternative

As discussed in Section 4.17.3.2, the workforce and number of equipment trips for construction, operation, and decommissioning of Alternative 2 would be the same as that for the Proposed Action. Therefore, daily worker commuting and haul truck trip volumes are also anticipated to be

the same. Therefore, the contribution of Alternative 2 to cumulative traffic impacts on the LOS for roadways and intersections would be the same as those described for the Proposed Action.

Alternative 3 – Reduced Project Alternative

As discussed in Section 4.17.3.3, the workforce for construction, operation, and decommissioning of Alternative 3 would be the same as that of the Proposed Action. However, the total number of trips required to deliver materials and equipment for construction would be 10,800, lower than the 14,400 total trips required for the Proposed Action and Alternative 2. The adverse impact of construction traffic at intersection of SR-78 and 16th Avenue is driven entirely by worker commuting vehicles, and is not affected by trips to deliver materials and equipment. Therefore, although the reduction in delivery trips by about three-quarters would reduce impacts at the intersections, the adverse impact associated with commuting workers in the PM peak hour would still result in lowering the level of service to LOS F at the SR-78 intersection with 16th Avenue under Alternative 3. Therefore, the contribution of Alternative 3 to cumulative traffic impacts on the LOS for roadways and intersections would be the same as those described for the Proposed Action.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. Alternative 4 would not contribute to cumulative transportation and traffic impacts.

4.17.7 Residual Impacts

The direct impacts of the Project on transportation and traffic are associated with the Project construction and decommissioning phases, each of which would be temporary. Construction would occur for a period of 25 to 48 months, and decommissioning would occur for a period of less than one year. Implementation of APM TRA-1 would reduce the number of vehicles leaving the Project to a level which allows the intersection of 16th Avenue and SR-78 to operate at LOS D. With implementation of this APM, the impact on the intersection would still not be reduced to a level less than significant. Mitigation Measure TRN-3 would modify APM TRA-1 to further reduce the number of construction worker vehicles leaving the Project site during the PM peak hour, such that the intersection of SR-78/16th Avenue operates at LOS C or better. In addition, Mitigation Measure TRN-4 would require improvement of 16th Avenue/Seeley Avenue and paving the intersection of SR-78/16th Avenue to allow a turning lane from 16th Avenue onto SR-78. These improvements would facilitate traffic flow at the intersection, further improving the Level of Service. With implementation of Mitigation Measures TRN-3 and TRN-4, the intersection would conform to the thresholds established in the Riverside County CMP and Riverside County General Plan, and impacts would be less than significant.

The contribution of the Project to cumulative traffic impacts would be temporary. The operational trips associated with all of the cumulative projects would be nominal, as compared to the overall traffic volumes at these locations. Therefore, it is anticipated that the LOS for any of the roadway

segments or intersections would be restored back to preconstruction conditions once construction of the projects is completed.

4.18 Utilities and Public Services

4.18.1 Methodology for Analysis

To evaluate water availability, the Applicant developed an analysis of groundwater availability in support of the Project (URS 2016a). Water demands of the Project are discussed in Chapter 2, *Proposed Action and Alternatives*, and in Section 3.18, *Utilities and Public Services*. An analysis of the effect of the proposed water use on regional groundwater resources is provided in Section 4.20, *Water Resources*. The Project's water demands were evaluated in comparison with the available water supply and historic regional water consumption levels.

The hazardous and non-hazardous wastes expected to be generated by the Project were evaluated in terms of local landfill capacity and compliance with applicable laws, ordinances, regulations, and policies, for solid wastes. The state and local environmental requirements listed in Section 3.18, *Utilities and Public Services*, have been established to ensure the safe and proper management of applicable wastes in order to protect human health and the environment.

Impacts to natural gas and electricity supplies were evaluated based on the potential for the Project to use these services, or to otherwise interfere with their delivery to other customers. Stormwater management impacts were evaluated based on the potential for the Project to interfere with publicly-operated stormwater management systems. Impacts to public services and facilities such as schools, hospitals, and emergency response capability were evaluated based on the potential for the Project to interfere with delivery of these services to others in the community.

4.18.1.1 CEQA Significance Criteria

The criteria used to determine the significance of the Project-related impacts to utilities and public services are based on the criteria identified in the state CEQA Guidelines, Appendix G. Project-related impacts would be considered significant if they:

USS-1) Result in substantial adverse environmental impacts associated with the provision of utility services. Substantial adverse environmental impacts may occur if the Project would:

1. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
2. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
3. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
4. Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements.
5. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

6. Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.
7. Fail to comply with Federal, state, and local statutes and regulations related to solid waste.

PS-1) Result in substantial adverse physical impacts associated with the provision of new or physically altered facilities to provide public services.

The following additional significance criteria from the County of Riverside Environmental Assessment Form are used in the analysis. A project could have potentially significant impacts if it would:

USS-2) Impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.

1. Electricity
2. Natural gas
3. Communications systems
4. Stormwater drainage
5. Street lighting
6. Maintenance of public facilities, including roads
7. Other government services

USS-3) Conflict with any adopted energy conservation plans.

4.18.2 Applicant-Proposed Measures

There are no APMs to address potential effects to utilities and public services.

4.18.3 Direct and Indirect Impacts

4.18.3.1 Alternative 1: Proposed Action

Construction, Operation, and Maintenance

Water Supply and Water Availability

As discussed in Sections 2.3.3.8 and 3.18.1.1, the Applicant would require a water source to supply water for use during construction and operations. There is no public water supply system in the Project area, and other water sources such as reclaimed water or surface waters would require entitlement. Therefore, the Project's water needs would either be met by onsite groundwater wells, or by water delivered to the Project by truck. This Final PA/EIS/EIR analyses both potential scenarios.

An analysis of the effect of the potential production of water from onsite wells on regional groundwater resources is provided in Section 4.20, *Water Resources*. The Project's water demands were evaluated in comparison with the available water supply and historic regional water consumption levels. The Applicant estimates that the 25-month construction timeframe would

require a total of approximately 1,400 AF of water, or 700 AFY, and that a 48-month construction timeframe would require approximately 1,800 AF of water, or 450 AFY. The Applicant estimates that operations would require up to 38 AFY, including 18 AFY for panel washing, and 20 AFY for other combined purposes. Assuming the use of 1,800 AF for construction, and a 30-year operations period, Project construction and operation would require a total of 2,940 AF of water.

As discussed in Section 3.20, *Water Resources*, onsite wells would access groundwater from within the Palo Verde Mesa Groundwater Basin (PVMGB), which directly underlies the Project site. The PVMGB is hydrologically continuous with the Palo Verde Valley Groundwater Basin (PVVGB). Therefore, both basins are considered together in support of the water supply assessment, for the purposes of evaluating potential water supply availability. The two basins are collectively referred to as the combined Palo Verde Groundwater Basin (PVGB) throughout the remainder of this section. Whether the source of the water is onsite groundwater wells or offsite supply brought to the Project by trucks, the source of the water is expected to be from within the PVGB. Therefore, the following analysis of water availability in the PVGB applies to both scenarios.

An evaluation of the groundwater availability and potential impacts to nearby groundwater users was conducted by the Applicant in support of the Project (URS 2016d). Table 3.20-1 presents the estimated annual groundwater budget for the PVGB. The California DWR estimates that the total groundwater storage capacity in the PVGB is approximately 6,840,000 AF, and the estimated recharge and outflow is approximately 426,600 AFY. The largest component of outflow of groundwater from the PVGB is discharge to the Palo Verde Irrigation District (PVID) drains, which return the water to the Colorado River. The drains comprise approximately 83.7 percent (357,000 AFY) of the total 426,600 AFY outflow from the PVGB. An additional 50,000 AFY (another 11.7 percent) is returned from the groundwater to the river through groundwater discharge in gaining sections of the river. The remaining 19,600 AFY (or approximately 4.6 percent) is pumped for use in agriculture (3,600 AFY), for municipal or domestic use (7,500 AFY), or lost through evapotranspiration by native riparian vegetation (8,500 AFY). In addition, the water level in the PVMGB has generally remained stable over the past few decades, except in areas immediately adjacent to some pumping wells (AECOM 2009). The relatively stable groundwater levels that have been measured over this period suggest that existing groundwater withdrawal from the underlying aquifer has not significantly changed the water balance within the PVMGB.

Project construction and operation would require a total of approximately 2,940 AF of water over the construction period plus the 30-year operation period. This volume of water represents about 0.04 percent of the total groundwater storage (6.84 million AF) available in the PVGB. The maximum annual use of 700 AFY represents 0.16 percent of the annual groundwater balance in the basin, and approximately 6.3 percent of the 11,100 AFY that is withdrawn from the basin to support agriculture, municipal, and domestic uses. That level of water use would occur only temporarily during the 25 month construction period, and would then be reduced to 38 AFY, which represents 0.3 percent of total agriculture, municipal, and domestic uses during Project operations. No water would be used to irrigate landscaping.

The Project would not access water from a public water supply system, and would therefore not have any impacts on existing public water supply systems. The onsite water system would be designed and constructed to meet just the needs of the Project, and would be classified as a non-community, non-transient water system because the Project's water system would only provide water for use by onsite employees and to support solar plant operation and maintenance. Based

on the temporary nature of the water use during construction, and the small volume of the proposed water use compared to overall water availability and water use for other purposes, the potential effects of water use on the public water supply would be minimal over the life of the facility.

Solid Waste Management

As described in Section 2.3.7.1, the Project would generate solid waste during construction, operation, and maintenance. All handling and processing of solid and hazardous wastes during construction and operations would be in accordance with applicable regulatory requirements as described in Appendix D, Section D.18. Solid waste would include various construction materials and worker-generated waste that would include a combination of recyclable and non-recyclable materials. Excess materials and wastes would be recycled or resold to the maximum extent practicable. Non-recyclable, non-hazardous solid waste materials would be landfilled in accordance with state and local regulations.

The Riverside County Waste Management Department operates six landfills. There is also a privately-operated landfill within the County (El Sobrante Landfill), and five privately-operated transfer stations open to the public. The nearest landfills that serve the Project area include the Blythe Landfill at 1000 Midland Road, which is approximately 17 miles north of the Project site, and Desert Center Landfill at 17-991 Kaiser Road in Desert Center, which is approximately 40 miles west of the Project site.

The Solid Waste Facility Permit for the Blythe landfill, issued in 2011, estimates that the landfill had more than 4 million cubic yards of capacity remaining out of a total capacity of about 6 million cubic yards, and that the estimated closure year for the landfill is 2047 (CalRecycle 2016). As shown in Table 2-2, the total estimated volume of construction debris that may be sent to landfills for disposal is 14,328 cubic yards. Therefore, sufficient capacity is anticipated to be available for waste disposal.

Natural Gas and Electricity

The Project would not use or interfere with any natural gas supplies.

Power to support Project construction and operations would be supplied by connecting the site to the existing SCE local distribution system. The closest interconnection point to that system is located approximately one mile north of the Project site. Once constructed, the Project would result in the generation of electricity. Transmission of generated electricity would be facilitated by connection to the existing CRSS. It is anticipated that the CRSS has capacity sufficient to convey power from the Project, even in combination with other anticipated solar power projects along the I-10 corridor.

Stormwater Management Systems

There are no stormwater management facilities on the Project site. As discussed in Section 4.20, the Project would result in only very minor changes in stormwater flows leaving the site. Therefore, the Project would not affect the operation or function of existing stormwater management facilities, and would not require the expansion or modification of such facilities.

Public Services and Facilities

Because construction would occur only for a period of 25 to 48 months, and operations would require only five full-time workers, it is unlikely that the Project would substantially increase the long-term local population. The local population would temporarily increase during construction, but this increase is not expected to require construction of new or alteration of existing physical facilities to support education, law enforcement, recreation, medical care, or emergency response services.

The proposed Project would change the land use for the Project area from undeveloped and former agricultural lands to an electrical facility and gen-tie lines. The new facility may require new capability to handle technical rescues at electrical facilities, such as confined space/trench rescue/high angle rescue. These capabilities may require increased staffing, training, and specialized rescue equipment. Additional equipment, in turn, may require additional storage and maintenance capability to ensure optimal performance in the event of an emergency.

Decommissioning

Decommissioning of the Project would involve activities similar to construction, including the use of water and electrical power. In general, the scale of activities would be smaller, and would occur for a shorter duration, than those associated with construction. Therefore, the water use and electrical supply for decommissioning are not expected to impact public services or facilities. During decommissioning, Project facilities would be removed and the approximate original grade restored, so there would be no impact to stormwater flows.

Decommissioning would result in the generation of solid waste. Anticipated solid waste streams include concrete, metal, plastics, and photovoltaic panels. Recyclable materials would be removed from the waste stream and recycled or resold prior to disposal of solid waste in an approved landfill. Solar PV panels would be reused if possible and then recycled at the end of their useful life. Based on the CIWMP for Riverside County, it is anticipated that at least 15 years of capacity would be available in landfills, countywide, at the time of decommissioning. Therefore, sufficient capacity is anticipated to be available to support decommissioning.

4.18.3.2 Alternative 2: Resource Avoidance Alternative

Construction, Operation, and Maintenance

Project activities under Alternative 2 would be similar to those for Alternative 1. Similar to the Proposed Action, Alternative 2 would not result in or require alteration of offsite facilities or services. The total volume of solid waste generated during construction, operation, and maintenance of Alternative 2 would be of similar composition to that discussed for the Proposed Action, but slightly reduced in total volume, and therefore would have a slightly reduced effect on available landfill capacity. Similar to the Proposed Action, waste disposal would comply with applicable laws.

Decommissioning

Decommissioning of Alternative 2 would be similar to that described for the Proposed Action, except that activities would be slightly reduced in size and duration due to the reduced Project area under Alternative 2. Decommissioning of Alternative 2 would not affect the operation or function

of other nearby facilities. Decommissioning would result in the generation of additional solid waste, but in slightly smaller volumes than the Proposed Action. Recyclable materials would be removed prior to disposal in an approved landfill, and similar to the Proposed Action, it is anticipated that sufficient landfill capacity would be available at the time of decommissioning, and decommissioning-related effects would be minimal.

4.18.3.3 Alternative 3: Reduced Project Alternative

Construction, Operation, and Maintenance

Project activities under Alternative 3 would be similar those for Alternative 1. Because Alternative 3 would involve a smaller Project area than Alternatives 1 or 2, all Project-related features and durations are expected to be reduced from those associated with those Alternatives. Construction of Alternative 3 would likely use a reduced amount of water, involve a reduced amount of construction traffic, and occur for a shorter duration than for Alternatives 1 and 2. Similar to the Proposed Action, Alternative 3 would not result in or require alteration of offsite facilities or services. The total volume of solid waste generated during construction, operation, and maintenance of Alternative 3 would be of similar composition to that discussed for the Proposed Action, but reduced in total volume, and therefore would have a reduced effect on available landfill capacity. Similar to the Proposed Action, waste disposal would comply with applicable laws.

Decommissioning

Decommissioning of Alternative 3 would be similar to that described for the Proposed Action, except that activities would be reduced in size and duration due to the reduced acreage of Alternative 3. Decommissioning of Alternative 3 would not affect the operation or function of other nearby facilities. Decommissioning would result in the generation of additional solid waste, but in smaller volumes than the Proposed Action or Alternative 2. Recyclable materials would be removed prior to disposal in an approved landfill, and similar to the Proposed Action, it is anticipated that sufficient landfill capacity would be available at the time of decommissioning, and decommissioning-related effects would be minimal.

4.18.4 Application of CEQA Significance Thresholds

USS-1) Would the Project result in substantial adverse environmental impacts associated with the provision of utility services?

Water and Wastewater

Alternatives 1, 2, or 3 would not require construction or expansion of public water treatment and/or service systems or additional entitlements or resources. These alternatives would use water during construction, either from onsite wells or trucked from offsite sources. Water use during construction would be temporary, and would not require new or expanded water facilities.

Restroom facilities during Alternatives 1, 2, or 3 construction would be provided by portable units to be serviced by licensed providers. During operations, the five workers would use a leach field and septic system. Alternatives 1, 2, or 3 would not exceed wastewater treatment requirements because the Project would not be connected to a public sewer system.

Natural Gas and Electricity

Alternatives 1, 2, or 3 would not involve the use of natural gas service. These alternatives would involve the installation of Project-specific communications cables, but would not interfere with existing services. Power to support construction of Alternatives 1, 2, or 3 would be supplied by generators. Power to support operations would be provided by backfeed power through the On-Site Substation, with long-term backup provided by a temporary diesel generator. No new or altered facilities would be needed. No impacts regarding these respective issues would occur.

Solid Waste Management

All handling and processing of solid and hazardous wastes from Alternatives 1, 2, or 3 would be in accordance with applicable regulatory requirements as described in Appendix D, Section D.18. Solid waste would include various construction materials and worker-generated waste that would include a combination of recyclable and non-recyclable materials. Excess materials and wastes would be recycled or resold to the maximum extent practicable. Non-recyclable, non-hazardous solid waste materials would be landfilled in accordance with state and local regulations. Alternative 1 is not expected to generate four or more cubic yards of waste per week during operations, so would not be subject to the recycling requirements of Assembly Bill 1826.

The Solid Waste Facility Permit for the Blythe landfill, issued in 2011, estimates that the landfill had more than 4 million cubic yards of capacity remaining out of a total capacity of about 6 million cubic yards, and that the estimated closure year for the landfill is 2047. As shown in Table 2-2, the total estimated volume of debris from Alternative 1 construction that may be sent to landfills for disposal is 14,328 cubic yards. Therefore, sufficient capacity is anticipated to be available for waste disposal. The solid waste generated during construction, operation, and maintenance of Alternative 2 would be of similar composition to that discussed for Alternative 1, but slightly reduced in total volume, and that for Alternative 3 would be more reduced than Alternative 2, and therefore would have a reduced effect on available landfill capacity. No impact would occur under any alternative, and no mitigation is recommended.

Stormwater Management Systems

There are no stormwater management facilities on Alternatives 1, 2, or 3. As discussed in Section 4.20, Alternatives 1, 2, or 3 would result in only very minor changes in stormwater flows leaving the site. Therefore, these alternatives would not affect the operation or function of existing stormwater management facilities, and would not require the expansion or modification of such facilities. Therefore, these alternatives would not result in significant environmental effects associated with expansion or modification of such facilities.

PS-1) Result in substantial adverse physical impacts associated with the provision of new or physically altered facilities to provide public services.

Alternatives 1, 2, or 3 would not result in substantial adverse environmental impacts associated with the provision of public services. The majority of the projected construction workforce for Alternatives 1, 2, or 3 would likely seek housing within an hour driving distance of the Project area, or seek temporary housing (such as seasonal, recreational, or occasional use housing; LTVAs; and hotel and motels) during the week and commute home over the weekend. Because construction would be temporary and the size of the operational workforce would be nominal,

Alternatives 1 or 2 would not induce substantial growth of the regional population. The duration of construction of Alternative 3 would be even shorter than for Alternative 1 or Alternative 2. As such, the effect on the existing facilities related to education, law enforcement, fire protection, parks and recreation, and hospital facilities and emergency response would be nominal for Alternatives 1, 2, or 3. Adverse physical impacts to these facilities during are considered to be less than significant and no mitigation is recommended.

USS-2) Would the Project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects?

- 1. Electricity**
- 2. Natural gas**
- 3. Communications systems**
- 4. Stormwater drainage**
- 5. Street lighting**
- 6. Maintenance of public facilities, including roads**
- 7. Other government services**

Construction of new utility facilities or the expansion of existing facilities would not be required for construction, operation and maintenance, and decommissioning of Alternatives 1, 2, or 3. Please refer to the previous discussions above under USS-1 with regard to electricity, natural gas, stormwater drainage, education, law enforcement, fire protection, parks and recreation, and hospital facilities and emergency response.

Construction traffic under Alternatives 1, 2, or 3 would cause degradation of 16th Avenue/Seeley Avenue, and could result in making the roadway unpassable for emergency vehicles or local traffic. Such degradation could be significant, requiring increased maintenance for the existing roadway, or construction of new roadway. To maintain the condition of the road, Mitigation Measure TRN-4 would require that the Applicant improve the segment between Neighbours Boulevard (State Route 78) and the site entrance, a length of approximately 5.6 miles, prior to beginning any construction activities at the Project area. With improvement of the access road, as required through Mitigation Measure TRN-4, impacts associated with the need for new roads or increased maintenance of existing roads under Alternatives 1, 2, or 3 would be less than significant.

Closure of the current access routes to the Mule Mountains could result in increased use, and therefore degradation, of the alternative access roads south and west of the Project area. To ensure that this alternative access is accessible and known to persons wishing to access the area, Mitigation Measure REC-1 requires that the Applicant perform light clearing and grading prior to Project construction, and then periodically as needed during construction, operations, and decommissioning. With maintenance of this alternative access, as required by REC-1, impacts would be less than significant.

Alternatives 1, 2, or 3 would not require or result in the construction of new street lighting or additional maintenance to public facilities or roads, as construction traffic would be short-term and occur during daytime hours. The minimal amount of permanent employee vehicle trips on local

roadways during Alternatives 1, 2, or 3 operations would not necessitate the expansion or construction of street lighting or cause additional burdens on local roadways resulting in increased maintenance.

USS-3) Would the Project conflict with any adopted energy conservation plans?

The power produced by Alternatives 1, 2, or 3 would produce renewable energy and support the goals of the RPS and would not conflict with adopted energy conservation plans. There would be no impact on any adopted energy conservation plan.

4.18.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.18 would be maintained. There would be no increased water consumption or waste generation, and there would be no impact on the capacity of utilities and service systems to serve demand.

4.18.6 Cumulative Impacts

The geographic scope of the cumulative impacts analysis for water and wastewater is the PVGB. The geographic scope for cumulative solid waste management impacts is the area served by the Blythe Landfill. The geographic scope for analysis of cumulative impacts to stormwater facilities is the surface water drainage basin upstream and downstream of the solar facility. The geographic scope of cumulative impacts to public services and facilities is the area served by those facilities. The temporal scope of each of the cumulative impact analyses includes the construction, operation and maintenance, and decommissioning periods. The cumulative analysis provided here considers implementation of the Project in combination with other past, present, and reasonably foreseeable future projects described in Tables 4.1-1 and 4.1-2.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

As discussed in Section 4.20.6, the past, present, and reasonably foreseeable future projects each contribute to a reduction in groundwater availability in the PVGB. The analysis presented in Section 4.20 was a cumulative analysis, as it evaluated the impact of withdrawals on all known water users in the PVGB. The Project would not represent a noticeable contribution to the total use of groundwater from the PVGB. The contribution of the Project to the cumulative use of water would be temporary during construction, after which the use of water would be minimal.

The analysis of the impact of solid waste management presented in Section 4.18.3.1 above is a cumulative analysis. The projections of landfill capacity developed by the Riverside County Waste Management Department (RCWMD) are cumulative, considering future population growth, projected economic activity, and trends in waste diversion rates. The analysis shows that the landfill has more than 4 million cubic yards of capacity remaining out of a total capacity of

about 6 million cubic yards, and that the estimated closure year for the landfill is 2047. Therefore, sufficient capacity is anticipated to be available for waste disposal for all of the cumulative projects.

Some of the past, present, and reasonably foreseeable projects provide stormwater drainage into drainage canals maintained by the PVID. Stormwater drainage from the Project may eventually enter the PVID drainage system after leaving the Project site and flowing off of the Palo Verde Mesa to the southeast. However, as shown in the hydrologic analysis discussed in Section 4.20.3.1, Project development is not expected to substantially increase the volume of stormwater flow leaving the facility. Therefore, the Project is not expected to result in increased flows in the PVID drain system, and would therefore not contribute to cumulative impacts.

The cumulative projects are not expected to result in substantial adverse environmental impacts associated with the provision of utility services. In general, utility services are designed in consideration of the existing and reasonably foreseeable future projects. Although each of the projects could potentially increase local populations and demand for utility services during their construction phases, any increase would likely be temporary for each project, and would probably not overlap for all projects during the same time period. Because construction of each of the projects would be temporary, and the size of the operational workforces would be nominal, the cumulative projects are not expected to induce substantial growth of the regional population. As such, the cumulative effect on the existing facilities related to electrical and natural gas systems; water and wastewater systems; solid waste; and drainage facilities would be nominal (impact USS-1). The Project would also not require new or expanded facilities for education, law enforcement, fire protection, parks and recreation, and hospital facilities and emergency response (impact USS-2), or conflict with any adopted energy conservation plan (impact USS-3).

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The analysis of groundwater availability in the PVGB presented in Section 4.20 was a cumulative analysis, as it evaluated the impact of withdrawals on all known water users in the PVGB. Because Alternative 2 would use the same amount of groundwater as the Proposed Action, its contribution to cumulative impacts would be the same as the Proposed Action. The contribution of Alternative 2 to the cumulative use of water would be temporary during construction, after which the use of water would be minimal.

The analysis of the impact of solid waste management presented in Section 4.18.3.1 above is a cumulative analysis. The projections of landfill capacity developed by the RCWMD are cumulative, considering all potential sources of waste, including industrial and commercial developments such as solar facilities. The analysis shows that the landfill has more than 4 million cubic yards of capacity remaining out of a total capacity of about 6 million cubic yards, and that the estimated closure year for the landfill is 2047. The solid waste generated during construction, operation, and maintenance of Alternative 2 would be of similar composition to that discussed for the Proposed Action, but slightly reduced in total volume, and therefore would have a reduced effect on available landfill capacity. Therefore, sufficient capacity is anticipated to be available for waste disposal for all of the cumulative projects, including Alternative 2.

Some of the past, present, and reasonably foreseeable projects provide stormwater drainage into drainage canals maintained by the PVID. Stormwater drainage from the Project may eventually

enter the PVID drainage system after leaving the Project site and flowing off of the Palo Verde Mesa to the southeast. Alternative 2 would result in only very minor changes in stormwater flows leaving the site. Therefore, Alternative 2 is not expected to result in increased flows in the PVID drain system, and would therefore not contribute to cumulative impacts.

The cumulative projects are not expected to result in substantial adverse environmental impacts associated with the provision of utility services. In general, utility services are designed in consideration of the existing and reasonably foreseeable future projects. Although each of the projects could potentially increase local populations and demand for utility services during their construction phases, any increase would likely be temporary for each project, and would probably not overlap for all projects during the same time period. Because construction of each of the projects would be temporary, and the size of the operational workforces would be nominal, the cumulative projects are not expected to induce substantial growth of the regional population. As such, the cumulative effect on the existing facilities related to electrical and natural gas systems; water and wastewater systems; solid waste; drainage facilities; education; law enforcement; fire protection; parks and recreation; and hospital facilities and emergency response would be nominal.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The analysis of groundwater availability in the PVGB presented in Section 4.20.6 was a cumulative analysis, as it evaluated the impact of withdrawals on all known water users in the PVGB. Because Alternative 3 would less groundwater than the Proposed Action and Alternative 2, its contribution to cumulative impacts would be lower than those of the other action alternatives. The contribution of Alternative 3 to the cumulative use of water would be temporary during construction, after which the use of water would be minimal.

The analysis of the impact of solid waste management presented in Section 4.18.3.1 above is a cumulative analysis. The projections of landfill capacity developed by the RCWMD are cumulative, considering all potential sources of waste, including industrial and commercial developments such as solar facilities. The analysis shows that the landfill has more than 4 million cubic yards of capacity remaining out of a total capacity of about 6 million cubic yards, and that the estimated closure year for the landfill is 2047. The solid waste generated during construction, operation, and maintenance of Alternative 3 would be of similar composition to that discussed for Alternatives 1 and 2, but reduced in total volume, and therefore would have a reduced effect on available landfill capacity. Therefore, sufficient capacity is anticipated to be available for waste disposal for all of the cumulative projects, including Alternative 3.

Some of the past, present, and reasonably foreseeable projects provide stormwater drainage into drainage canals maintained by the PVID. Stormwater drainage from the Project may eventually enter the PVID drainage system after leaving the Project site and flowing off of the Palo Verde Mesa to the southeast. Alternative 3 would result in only very minor changes in stormwater flows leaving the site. Therefore, Alternative 3 is not expected to result in increased flows in the PVID drain system, and would therefore not contribute to cumulative impacts.

The cumulative projects are not expected to result in substantial adverse environmental impacts associated with the provision of utility services. In general, utility services are designed in consideration of the existing and reasonably foreseeable future projects. Although each of the projects could potentially increase local populations and demand for utility services during their

construction phases, any increase would likely be temporary for each project, and would probably not overlap for all projects during the same time period. Because construction of each of the projects would be temporary, and the size of the operational workforces would be nominal, the cumulative projects are not expected to induce substantial growth of the regional population. As such, the cumulative effect on the existing facilities related to electrical and natural gas systems; water and wastewater systems; solid waste; and drainage facilities; education; law enforcement; fire protection; parks and recreation; and hospital facilities and emergency response would be nominal.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. Alternative 4 would not contribute to cumulative impacts on utilities and public services.

4.18.7 Residual Impacts

Residual impacts with respect to utilities and public services include increased use of groundwater during construction, and increased disposal volumes for solid waste during the lifetime of the Project, in comparison to the baseline. Total water supply available in the PVGB would be reduced slightly as a result of the Project; however, it is likely that such reductions would not be noticeable. The increases in solid waste disposal are anticipated to be manageable within available landfill capacities. Stormwater drainage conditions would be altered slightly as a result of Project implementation, and would remain altered throughout Project operations. However, this alteration is not expected to impact stormwater drainage systems. Following decommissioning, original Project area topography would be restored, and there would be no residual effects on stormwater flow.

4.19 Visual Resources

This section discusses effects on visual resources that would occur with implementation of the Proposed Action and alternatives, cumulative effects, and mitigation measures to reduce visual contrast. Overall, the DQSP would result in disturbance, and therefore long-term visual alteration, to approximately 3,831 acres of land, nearly all of which has been classified as B and C-Quality scenery. The land altered by the DQSP solar units and gen-tie line is considered to have high visual sensitivity.

4.19.1 Methodology for Analysis

There are two forms of visual analysis associated with the Proposed Action. The first visual analysis is to determine compliance with the Interim VRM Class. The second analysis is to determine the extent of visual impact or change from the existing condition that would result from the Proposed Action or alternatives.

Both analyses are achieved using the BLM Visual Resource Contrast Rating System (H-8431), which provides a method for systematically evaluating the visual contrast between a Proposed Action or alternatives and the existing landscape, including an assessment of ten human and environmental factors (distance, angle of observation, length of viewing time, size and scale, season of use, lighting conditions, recovery time, spatial relationships, atmospheric conditions, and motion). The results of the Visual Contrast Rating analysis provide a means for determining the source of visual contrast that exceeds what is allowable, as defined by the VRM Class Objective, and provides information to describe how the land modification will change the existing visual landscape.

Visual contrast is a measure of divergence in the classic design elements of form, line, color, and texture, and applied to landscapes in accordance with the BLM's Handbook H-8431. Compliance is found when the Proposed Action or an alternative meets the allowable level of visual contrast set by the Interim VRM Class objectives. If the Proposed Action or alternatives are nonconforming, then mitigation measures sufficient to bring the design into compliance would need to be identified and implemented. If a project cannot be mitigated to meet the VRM Class objective, then the application may be denied, or the proposal redesigned or relocated to meet the objective.

The assessment of visual contrast is distinct from conclusions of *visual impact* presented in this section. A measure of visual impact is evaluated by the underlying values of the VRI including changes to scenic quality, sensitivity levels, and visibility that would occur on the ground as a result of the development of the Proposed Action or alternatives.

Under the DRECP, VRM Classifications were established for the Project area. The Project area is designated as VRM Class IV. As an application in the Riverside East SEZ filed before June 30, 2009, the DQSP is not, and will not be, subject to the terms of the DRECP. See section II.3.3.3.5 and page II.3-126 of the DRECP. In addition, the analysis of the Project in this PA/EIS/EIR is based on the visual resource classifications that were in effect on March 6, 2015, the date of the NOI, which was VRM Class III. A discussion of the differences between the CDCA Plan and the DRECP land use allocations, and their effect on the analysis of the Project in this PA/EIS/EIR, is presented in Appendix E.

The DQSP is evaluated for conformance with the following VRM objective:

VRM Class III: The objective of this class is to *partially retain* the existing character of the landscape. The level of change to characteristic landscape should be *moderate*. Management activities may attract attention but *should not dominate the view of the casual observer*. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

Since the overall VRM goal is to minimize visual impacts, mitigation measures are recommended for all adverse contrasts that could be reduced, even if the DQSP or alternatives meet VRM objectives. In addition to visual contrast created in the landscape, the DQSP is analyzed for adverse effects of lighting and glare, as well as temporary construction disturbances.

4.19.1.1 Visual Contrast Rating Process

The degree to which the DQSP adversely affects the visual quality of a landscape relates directly to the amount of visual contrast between it and the existing landscape character. The degree of contrast is measured by separating the landscape into major features (land, water, vegetation, structures) then assessing the contrast introduced by the Project in terms of the design elements of form, line, color, and texture. The contrast of the DQSP with landscape elements then is rated as none, weak, moderate, or strong, as defined in Table 4.19-1. The purpose of this method is to reveal elements and features that cause the greatest visual contrast, and to guide efforts to reduce the visual impact of a proposed action or activity. This process is described in detail in Handbook H-8431-1, Visual Resource Contrast Rating (BLM 1986), and documented using BLM Form 8400-4.

The criteria for visual contrast are aligned with the management objectives for each Interim VRM Class. For example, if a project results in a weak visual contrast, it is likely to be in conformance with Interim VRM Class II, whereas a project that results in a moderate contrast would likely be in conformance with VRM Class III objectives but would not conform to VRM Class II objectives.

Table 4.19-1. Visual Contrast Ratings

Degree of Contrast	Criteria	Consistent with...
None	The element contrast is not visible or perceived.	VRM Class I - IV
Weak	The element contrast can be seen but does not attract attention.	VRM Class II - IV
Moderate	The element contrast begins to attract attention and begins to dominate the characteristic landscape.	VRM Class III - IV
Strong	The element contrast demands attention, will not be overlooked, and is dominant in the landscape.	VRM Class IV only

4.19.1.2 Selection of Key Observation Points

The contrast rating is completed from the most critical viewpoints, or Key Observation Points (KOPs). The intent of establishing KOPs is to visualize the contrast created by the Proposed Action from locations most representative of how the public perceives the affected landscape. The “public” may include highway travelers, travelers on local roads, residents in surrounding interspersed private lands, OHV users, dispersed recreation users in surrounding wilderness areas, or users of BLM facilities, such as LTVAs. The sensitivity of these diverse user groups to changes in the landscape are influenced by a number of factors, including how prominent the view of the Proposed Action is (in terms of scale, distance, and angle of observation), the frequency and duration that viewers are exposed to the view, and whether the viewer groups are aware of their surroundings (BLM 1986).

Based on the above factors and in consultation with BLM staff, eight KOPs (see Figure 3.19-1) were selected to evaluate the change of visual contrast between DQSP site’s existing conditions and proposed altered conditions. No KOPs were selected in the surrounding BLM wilderness areas because accessibility is limited, the level of use is low, and the DQSP would likely not be visible from the wilderness lands. The location and characteristics of each KOP are summarized in Table 4.19-2.

Table 4.19-2. KOP Locations and Characteristics

ID	Name	Viewer Geometry	View Distance and Direction	Viewer Type	Visual Exposure Description
KOP 1a-h	Interstate 10	At-grade	0.5-15 miles northwest to northeast	Motorists	Numerous travelers potentially exposed to foreground views of PV arrays and background views of transmission towers. Views are temporary/intermittent.
KOP 2	Chuckwalla ACEC	At-grade	5.0 miles west	Recreationists	Middleground and background views for recreationists within the ACEC, with potential views of solar arrays as well as taller Project infrastructure (transmission towers, anemometer, and 34.5 kV poles). Views are sustained/intermittent.
KOP 3	McCoy Mountains	Superior	0.5 miles north	Recreationists	Foreground/middleground views across the Palo Verde Valley for dispersed recreationists. Views are sustained/intermittent.
KOP 4	Mule Mountains	Superior	1.0 miles south	Recreationists	Foreground/middleground views for recreationists. Views are sustained/intermittent.
KOP 5	Bradshaw Trail	At-grade	4.0 miles south	Recreationists	Foreground/middleground, and background views for recreationists on the trail with potential foreground views of PV Arrays, background views of transmission towers. Views are intermittent.

Table 4.19-2. KOP Locations and Characteristics

ID	Name	Viewer Geometry	View Distance and Direction	Viewer Type	Visual Exposure Description
KOP 6	Nicholls Warm Springs/Mesa Verde	At-grade	1.0 miles north	Residents	Foreground/midground views for transient and long-term (resident) viewers. Views are sustained.
KOP 7	Community of Ripley	At-grade	6.0 miles southeast	Residents	Background views for long-term (resident) viewers. Views are sustained.
KOP 8	Colorado River	At-grade	12.0 miles southeast	Recreationists	Background views for recreationists along/within the river. Views are sustained.

These KOPs were chosen to represent a mix of user types and viewer experiences. The visual contrast created by the DQSP is rated using simulations from each of these KOPs, and is used to represent the visual change experienced from different locations and viewer types.

4.19.1.3 Visual Simulations

Visual simulations were prepared for a subset of KOPs that represented various viewer positions and related visibility of the Project. Visual simulations were prepared for five KOPs: 1c, 2, 3, 4, and 7. For KOPs 1a, b, d-h, 5, 6, and 8, assumptions were made regarding the level of visual contrast expected rather than using visual simulations to determine effects. Visual simulations were prepared for the operational phase of the Project only; no construction visual simulations were prepared.

The visual simulations were based on a collection of photographs taken using a digital SLR 1:1, 21 megapixel camera to create a panorama that represented the primary vertical and horizontal field of view. Simulations were prepared using a true-to-scale digital 3D model of the Project and spatial data indicating locations of Project features. The Applicant provided Project design-related specifications used in the model. Professional grade survey instruments were used to identify locations of KOPs as well as target objects used for accurate alignment of the 3D model to the photography. Land contour data was used to generate a 3D model of the site, into which proposed solar facilities were accurately placed into the individual photo simulation views. Simulations were produced using Autodesk 3D Studio Max Design and Adobe Photoshop. The resulting photo simulation represents the appearance of the Project within the primary human field of view when viewed from a position located 19.7 inches back from the photo.

4.19.1.4 CEQA Significance Criteria

The significance criteria for aesthetics listed in the CEQA Environmental Checklist, Appendix G of the state CEQA Guidelines, were used to assess the significance of visual impacts resulting from the Project. These thresholds indicate that a project could have potentially significant impacts if it would:

VIS-1) Have a substantial adverse effect on a scenic vista.

VIS-2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

VIS-3) Substantially degrade the existing visual character or quality of the site and its surroundings.

VIS-4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

The County of Riverside's Environmental Assessment Form includes additional significance criteria, which were used in the analysis. The additional criteria indicate that a project could have potentially significant impacts if it would:

VIS-5) Result in the creation of an aesthetically offensive site open to public view.

VIS-6) Interfere with nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655.

VIS-7) Expose residential property to unacceptable light levels.

4.19.2 Applicant-Proposed Measures

Lighting

Lighting on the Project site will be limited to areas required for operations or safety, will be directed onsite to avoid backscatter, and will be shielded from public view to the extent practical. Sensors or switches will control lighting that is not required to be on during nighttime hours.

Measures included in the Applicant's Draft Lighting Management Plan are based on the Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands (BLM 2013), and include:

- Provide design and installation guidelines to minimize night-sky impacts during facility construction and operations;
- Limit lighting for facilities to the minimum number of lights and brightness required for safety and security, and avoid causing excessive reflected glare;
- Use of full cut-off luminaires or directional low spectrum LED fixtures to minimize uplighting and reduce light pollution;
- Direct lights downward or toward the area to be illuminated;
- Avoid use of light fixture designs that would allow spill light beyond the Project boundary;
- Provide lighting in highly illuminated areas that are not occupied on a continuous basis with switches, timer switches, or motion detectors so that the lights operate only when the area is occupied;
- Use of vehicle mounted lights for night maintenance activities, where feasible;
- Consistent with safety and security, wherever feasible, keep lighting off when not in use; and

- Definition of a process for promptly addressing and mitigating complaints about potential lighting impacts.

Color and Reflection

The Project design will include the following measures to reduce potential visual impacts from new man-made facilities in the viewshed:

- BLM-acceptable exterior color on Project buildings as appropriate; and
- Fencing constructed of non-reflective materials.

Profile of Facilities

The Project will use low profile PV panel structures that do not extend higher than approximately 13 feet above the ground surface and Project facilities will be set back more than one mile from I-10 and at least four miles from SR-78 to reduce effects of introducing dark PV panels into the landscape.

As discussed in Section 4.1.6, the impact analysis assumes that the APMs have been implemented, and these measures are therefore requirements for approval of the Project. The APMs are to be incorporated into the EICMPP/MMRCP, along with the agency-required mitigation measures.

4.19.3 Direct and Indirect Impacts

4.19.3.1 Alternative 1: Proposed Action

The Proposed Action would convert approximately 3,616 acres of naturally appearing desert plain, and 154 acres of former agricultural land, to an industrial facility characterized by complex geometric forms and lines and industrial surfaces that are dissimilar to the surrounding natural landscape character. Most of the developed area would be covered with solar PV panels. Solar PV employs glass panels that are designed to maximize absorption and minimize reflection to increase electricity production efficiency. To limit reflection, solar PV panels are constructed of dark, light-absorbing materials and covered with an anti-reflective coating. Solar panels reflect as little as 2 percent of the incoming sunlight depending on the angle of the sun and assuming use of anti-reflective coatings (FAA 2010). An example of a solar PV array is shown in Figure 2-3.

The DQSP solar field would occupy most of the disturbed area (2,652 acres, or 74.8 percent of the total disturbed area), whereas electrical substations and transmission facilities, an O&M building, and access roads would take up the rest of the disturbed area. Most of the facility, including the solar field, would be low-profile, and would not exceed 13 feet in height. Some of the ancillary facilities, located primarily on the southeast section of the solar field, would have greater heights. The proposed gen-tie line leading away from the main generation facility would be approximately 135 feet tall, depending on the location and local terrain, with final heights to be determined during detailed design. Approximate dimensions of proposed facilities are provided below:

Solar Field

- Solar field: Linear arrays of PV modules up to 13 feet above grade, at a maximum.

- Security fence: Chain-link or wire fence around the perimeter, 7 feet tall, and upper 1 foot may be barbed wire.
- An estimated nine anemometer towers would be installed around the site perimeter. The anemometer towers would range from approximately 20 to 30 feet high.

Operations and Maintenance Area

- Operations and Maintenance (O&M) Building: The building would rest on a cement foundation, and would be approximately 120 feet by 50 feet in size.
- Lighting: During construction, portable light towers and plants may be used if necessary; otherwise lighting would consist of limited lighting installed around the construction office trailers. During operations, lighting would be placed at the O&M Building, On-Site Substation, and site entrance. Some portable lighting may also be required for maintenance activities that must be performed at night.
- Water Treatment: A septic system and leach field located at the O&M Building would serve as the sanitary waste system for Project operations.
- Water Storage: An above-ground water/firewater tank would be located at the O&M building, and would be used for drinking water and sanitary purposes.

Power Structures

- The On-Site Substation facility would occupy approximately 2.6 acres in the northwest portion of the Project site.
- Hard-wired fiber-optic cable would be installed underground to connect the site to existing communications cables, located approximately one mile to the north.
- Gen-Tie Line: Heights of structures would vary depending on the electrical clearances required, but would be lower than 135 feet in all cases.
- Distribution Line: The overhead lines would be carried on wood or color-treated steel poles with a maximum height of 70 feet.
- Power to support Project construction would be supplied by generators. Power to support operations would be provided by backfeed power through the On-Site Substation, with long-term backup provided by a temporary diesel generator.

Lighting requirements are discussed in detail in Chapter 2. During construction, security lighting would be needed at the construction staging areas, parking area, construction office trailer entries, site access points, and the security guard booth. Limited lighting would be installed around the construction office trailers. If needed for security, small lights with motion sensors may be installed on the outside of construction office trailers and/or portable light plants may be installed in a laydown yard or parking area. In addition, portable light towers may be used if, due to schedule or heat constraints, construction activities were to occur at night. During operation and maintenance, lighting would be placed at the O&M Building, On-Site Substation, and site entrance. Some portable lighting may also be required for maintenance activities that must be performed at night. There would be no lighting along the Project perimeter. Lighting would be

kept to a minimum and sensors and switches would be utilized to keep lighting off when not needed. All lights would be shielded and face downwards as much as possible.

The BLM’s visual contrast rating system was used to analyze the visual impacts of the Project from eight KOPs. Figures 4.19-1 through 4.19-10 present both the existing and simulated conditions at each of the five KOPs for which simulations were created. The visual contrast ratings are summarized below in Table 4.19-3.

Table 4.19-3. Visual Contrast Rating Summary

ID	Name	Source of Contrast	Scale Dominance	Viewer Geometry	Duration of View	Overall Visual Contrast
KOP 1(a-h)	Interstate 10	Form; color; texture	Apparent	Oblique/superior	Intermittent	Moderate
KOP 2	Chuckwalla ACEC	N/A	Not apparent	Variable	Intermittent	None-Weak ¹
KOP 3	McCoy Mountains	Form; color; texture	Dominant	Superior	Intermittent	Strong
KOP 4	Mule Mountains	Form; color; texture	Dominant	Superior	Intermittent	Strong
KOP 5	Bradshaw Trail	N/A	N/A	Variable	Intermittent	None
KOP 6	Nicholls Warm Springs/Mesa Verde	Form; line	Apparent	At-grade	Sustained	Moderate-Strong
KOP 7	Town of Ripley	Form; line	Not apparent	At-grade	Sustained	Weak
KOP 8	Colorado River	N/A	Not apparent	At-grade/inferior	Intermittent	None

Source: URS 2016c.

Notes:

1 – Visual contrast may increase to a moderate-to-strong level depending on the vantage point within this resource.

Overall, the proposed solar field would cause the greatest visual contrast in the character element of form. From KOPs 1, 3, and 4, the Project would cause Moderate to Strong contrast in form, color and texture due to the density and movement of construction equipment and activities as well as smooth-textured and distinct tan color of graded areas, which would provide moderate contrast against the natural setting of the Chuckwalla Valley and the Palo Verde Mesa. For KOPs 6 and 7, the main source of contrast would be form and line. At KOP 6, the close proximity (less than one mile) of construction activities would provide moderate contrast, as well as the large scale of the Project and the smooth flat solar panels against the coarser texture of the background. At KOP 7, the collector poles would be visible though they would provide low visual contrast as they would be similar in line and form to other transmission and distribution pole structures in the area.

At KOPs 2, 5, and 8, the Project would result in None to Weak contrast due to low visibility of the Project from these locations due to topographic screening, presence of other transmission line facilities in the area, and distance of these KOPs from the Project.

As shown in the Table 4.19-3, overall visual contrast for KOPs 1, 2, 5, 7, and 8 is Moderate or less, which meets the visual resource management objective for VRM Class III areas. However, for KOPs 3, 4, and 6 the overall visual contrast is moderate-strong or strong, which does not meet

the VRM Class III objective of a moderate level of change to the characteristic landscape. The visual contrast at these KOPs (and KOP 1) is due to their elevation above the Project site and/or close proximity to the Project site. A strong visual contrast would be reflective of the VRM Class IV objective.

The visual contrast provided by the Project could also affect scenic quality in the six SQRUs that the Project is located within or adjacent to. The scenic quality factor of “Cultural Modification” could be reduced due to the visual contrast of the Project with the existing landscape. The factor of “Adjacent Scenery” could also be affected if the land use objectives associated with surrounding SQRUs were reliant on the scenic quality of SQRU 021 where the Project site is located.

In SQRU 021 (Chuckwalla Valley), the Project’s solar arrays, the most dominant visual element of the Project, would contrast with the existing natural character of the SQRU, thereby increasing the “Cultural Modification” of the SQRU (via a decreasing score), and therefore reducing the overall scenic quality rating of the SQRU from B to C.

As shown in Table 4.19-4, three of the five adjacent SQRUs would not be expected to undergo a change in scenic quality rating due to the Project. In SQRU 026 (McCoy Mountains), the Project would likely not be visible from the majority of the SQRU and the Project is not expected to detract from existing adjacent scenery in the adjacent National Park or Wilderness area. In SQRU 037 (Palo Verde), the Project could appear as a dominant element in the adjacent scenery and therefore reduce the value of the “Adjacent Scenery” factor, but not to an extent that a change in scenic quality would result. In SQRU 039 (Little Chuckwalla Mountains), though the Project may be visible from a part of the SQRU, the adjacent scenery is dominated by the nearby mountain ranges and would not be dominated by the Project, thus no change in scenic quality would result.

However, as noted in Table 4.19-4, there are two SQRUs that would be expected to decrease in scenic quality due to the Project. In SQRU 036, though the Project would not be visible from most of the SQRU, “Adjacent Scenery” may be reduced due to the modification of the Chuckwalla Valley from the Project’s contrast with the natural characteristics of the valley. A one point reduction in “Adjacent Scenery” would reduce the existing rating from B to C. In SQRU 038, the Project could appear as a dominant element of the “Adjacent Scenery” that would be in contrast to the natural setting of the Chuckwalla Valley, thereby reducing the “Adjacent Scenery” score. A one point reduction in “Adjacent Scenery” would reduce the existing rating of SQRU 038 from B to C.

Table 4.19-4. Scenic Quality Rating Unit Impact Summary

Scenic Quality Rating Unit (SQRU) ¹	SQRU Name ¹	Existing Rating ²	Expected Post-Project Rating	Rationale ¹
021	Chuckwalla Valley	B	C	Reduction in “Cultural Modification” from 0 to -4.
026	McCoy Mountains	C	C	Operation of the Project is not expected to detract from existing values for “Adjacent Scenery.”
036	Blythe Valley	B	C	A reduction of one point in the value for “Adjacent Scenery” to account for modification to the Chuckwalla Valley.
037	Palo Verde	C	C	Despite the reduction of 1 point for “Adjacent Scenery” value, no change in overall classification would occur.

Table 4.19-4. Scenic Quality Rating Unit Impact Summary

Scenic Quality Rating Unit (SQRU) ¹	SQRU Name ¹	Existing Rating ²	Expected Post-Project Rating	Rationale ¹
038	Mule Mountains	B	C	A reduction of 1 point in the value for “Adjacent Scenery” would decrease the overall scenic quality score from 12.5 to 11.5.
039	Little Chuckwalla Valley	B	B	“Adjacent Scenery” is dominated by the rugged topography of the Mule, McCoy and Little Chuckwalla Mountains; consequently, no change in the inventoried value for “Adjacent Scenery” is expected.

Source: URS 2016c

Notes:

1. Source: BLM 2010

2. Refer to Section 3.19 for a description of the ratings.

In terms of visual sensitivity, the Project is located in SLRU 49 (Bradshaw Trail National Backcountry Byway SLRU). SLRU 49 received a score of high due to the importance of maintaining scenic quality for adjacent land uses, including ACECs and Wilderness areas. Under the Project, the sensitivity score would likely remain high, as recreationists would continue to use the area and would prefer that no further development occur.

Collectively, the strong visual contrast of the Project at several KOPs and reduction in scenic quality of three SQRUs could reduce the overall VRI score for the Project site and surrounding lands from a Class II to Class III or IV. Due to the visual contrast of the solar panels with the natural landscape of the Chuckwalla Valley, the Project would begin to attract attention and begin to dominate the characteristic landscape. Landscape character changes to the elements of form and texture would be primarily perceived from superior (higher elevation to the Project) locations; color and line element changes are expected to be weak.

In an effort to reduce contrast resulting from the Project, Mitigation Measure VIS-1 contains 10 design elements to reduce form, color, line and texture contrast. Design elements include minimizing ground clearing; color treatment of cut slopes; feathering vegetation openings; color-treating panel backs; using low to no reflective materials, coatings or paints; consistency in building colors; use of nonspecular conductors and nonreflective coatings on insulators, color choice options, and preparing a lighting plan.

These design elements would assist in reducing contrast created by the Project, however, Mitigation Measure VIS-1 would not be sufficient to substantially reduce the contrast rating of the KOPs because the color and texture of the Project’s solar panels and the large scale of the Project would continue to create contrast during Project operations. During Project construction, large cleared areas and construction activities would also continue to create visual contrast.

With mitigation, and accounting for viewer specific conditions (such as view duration, viewer expectations, visual contrast, and view exposure), the DQSP would have moderate adverse impacts on visual resources due to moderate to strong visual contrast and impacts experienced within the foreground/midground zone. Impacts in the foreground/midground would be experienced by viewers with prolonged views (residences – KOP 6); however, most viewers (likely from higher elevations – KOPs 3 and 4) that would experience impacts would be transient (dispersed recreationists). Visual resource impacts would not be experienced from sensitive viewer locations

within the Project's viewshed, including the Chuckwalla ACEC, Bradshaw Trail, Town of Ripley, and the Colorado River.

The following analysis discusses the visual effects of the three phases of the DQSP that have not been otherwise addressed above, as well as additional mitigation measures proposed to reduce visual contrasts.

Construction

During the construction period, earth-moving activities and construction materials, equipment, and workers, all could be visible on the site and along the gen-tie line ROW. Construction would occur over 25 to 48 months, during which a number of activities would take place, including large-scale vegetation removal, earthwork, as well as foundation and equipment installation. However, the overall degree of visual impact would be somewhat lessened because the area covered by any one phase of construction would be smaller compared to full build-out of the DQSP, and the visual effects would be temporary.

During construction, visual contrast would occur due to density and movement of construction equipment and workers, as well as construction activities such as site preparation and grading, installation of facilities, and building construction. Graded areas would contrast the natural setting of the Project site due to changes in color and texture resulting from the flat, smooth texture and distinct tan color of areas where natural vegetation was removed. Cleared areas would be shielded by surrounding vegetation for at-grade viewers, though installation of powerline poles would be visible due to the vertical nature of these facilities. Cleared areas would be more noticeable to viewers at higher elevations than the Project site. In general, construction-related activities would appear dominant for KOPs 4 and 6 due to the close proximity of viewers at these KOPs to the Project site.

Although the construction period is estimated to occur for 25 to 48 months, construction would not occur in any one place for the entire period. Further, construction activities would be conducted in a manner that minimizes dust emissions, including visible dust, as described in APMs for air quality. These measures would include watering of unpaved travel surfaces and limiting travel speed on these surfaces to 15 miles per hour. If nighttime construction activities were required, lighting would be provided that meets state and Federal worker safety regulations.

To the extent possible, the nighttime construction lighting would be shielded and directed downward, as described in Chapter 2. Task-specific lighting would be used to the extent practical while complying with worker safety regulations. Construction boundaries would be clearly delineated and surface disturbance minimized under Mitigation Measure VIS-2. Earthwork and vegetation manipulation strategies in Mitigation Measure VIS-1 and VIS-2 would assist in toning down the contrast created in earth-moving and vegetation clearing. Adverse visual effects associated with generation of airborne dust as well as nighttime lighting during construction activities at the Project would be reduced with the implementation of Mitigation Measures AQ-1, AQ-2, VIS-1, and VIS-2.

Operation and Maintenance

The primary feature of the Project that would result in visual contrast is the solar panels. There are other transmission lines in the area, and thus the gen-tie line and distribution lines and poles would be less noticeable.

The Project would have no visual contrast at KOPs 8 and 5. The Project would have weak visual contrast at KOPs 1, 2, and 7 due to low visibility and screening from topography. At KOP 1, there is an estimated 4 mile segment of I-10, where the elevation of I-10 is higher than the Project site, in which the Project would be temporarily visible to east or west-bound travelers. The Project would have intermittent viewer exposure and weak visual contrast due to the low stature of the solar panels and subdominant appearance of the Project compared to the surrounding landscape.

The Project would have strong visual contrast at KOPs 3 and 4 and moderate visual contrast at KOP 6. At all three KOPs, the broad, flat form and dark color of the solar panels would provide form, color and texture contrast with the existing muted-tone landscape. In addition, the large scale of the facility relative to surrounding natural landscape would provide visual contrast such that the Project would dominate the landscape at KOPs 3 and 4. The gen-tie line would have a weak visual contrast at KOPs 3, 4, and 6 due to existing transmission line structures in the area. The collector poles would have a weak-moderate contrast at KOP 4 and weak contrast at KOPs 3 and 6 due to similar facilities in the area.

During the operation of the Project, visual effects would be caused by the visible elements of the DQSP, as described above. The discussion below focuses on the visual effects that are not captured by visual simulations (nighttime lighting and reflected sunlight/glare), or that are unique to the operation and maintenance phase. Mitigation Measure VIS-3 would be required to ensure that visual design measures are maintained properly over time, because some visual design measures can degrade over time and some may require monitoring and maintenance.

Operational Lighting

During operation and maintenance, lighting would be placed at the O&M Building, On-Site Substation, and site entrance. Some portable lighting may also be required for maintenance activities that must be performed at night. There would be no lighting along the Project perimeter.

The Draft Lighting Management Plan prepared by the Applicant describes the lighting to be used during operation of the Project and lighting best practices to be used by the Project. Implementation of the measures included in the Draft Lighting Management Plan would reduce potential nighttime lighting impacts for residents in Nicholls Warm Springs/Mesa Verde, motorists along I-10 and other nearby roads, as well as dispersed recreationists on adjacent BLM lands. While the measures in the Draft Lighting Management Plan would not totally eliminate the light visible by surrounding user groups, facility lighting would be minimized and controlled such that it would not be a nuisance and would not detract from the ability for affected viewers to enjoy their surroundings or view the night sky. Existing light sources described in Section 3.19, *Visual Resources*, such as the motor vehicles traveling on surrounding roadways and from residences in Mesa Verde/Nicholls Warm Springs, would remain the primary sources of light within the Project area.

Glint and Glare

Adverse visual impacts and the potential for air traffic hazards from glint and glare effects is an issue of public concern regarding the installation of solar arrays, including PV modules. Glint

(specular reflection) is produced from the reflection of the sun on a reflective surface. Glint is a potential source of viewer distraction from the strong contrasts and intense reflected light from reflective surfaces. Glare is a reflection of the bright sky that is less intense than glint, and is a continuous source of brightness during daylight hours.

Unlike large fields of parabolic mirrors, which have been known to produce fairly intense glint and glare at various times of the day, the use of PV technology is generally regarded as causing a lesser degree of glint and glare impacts. Solar PV employs glass panels that are designed to minimize reflection and reflect as little as 2 percent of the incoming sunlight (FAA 2010). The entire purpose of PV panels is to absorb as much sunlight as possible, and therefore to reflect as little as possible. To accomplish this, panels are constructed of dark blue or black materials (DOE 2014). Nevertheless, glare will be reflected from the surface of the PV panels and other DQSP components (especially metallic components) that reflect light depending on panel orientation, sun angle, viewing angle, viewing distance, and other factors. For example, Sullivan et al. (2010 as cited in DOI 2010) observed glare from a slightly elevated viewpoint at a distance of approximately 2 miles from panels and ancillary components at a partially built PV facility in Nevada. Even though the panels to be used would be a uniform black color, from certain angles and times of day, the panels may appear grey or silvery white due to glare (Sullivan et al., 2010 as cited in DOI 2010).

Potentially affected observers of glare from the Project would be travelers on I-10, users of nearby OHV routes, and visitors to the McCoy or Mule Mountains. This glare could occur in any one place for several hours (e.g., a sunny afternoon), but is unlikely to be visually distracting or nuisance causing, though the glare produced by the DQSP could be more intense than any other natural or cultural features in an observer's perspective. The color contrast of the dark grey solar panels of the Project and the surrounding desert colors could be increased by glare produced from diffuse reflections of the DQSP, but would not be sufficiently intense or distracting as to alter any of the contrast ratings in Table 4.19-3.

Several measures are available that would reduce the potential for and frequency of glare from the solar fields. Under Mitigation Measure VIS-1, nonspecular conductors and nonreflective coatings on insulators would be required for the gen-tie line and low to no reflective materials, coatings or paints would be used when possible. Further, Mitigation Measure VIS-3 would ensure that painted and color-treated surfaces are maintained during operation and maintenance so as to prevent degradation of paint and colored-treated surfaces. The extent of reflective surfaces within the solar field and gen-tie line would be reduced by these mitigation measures; however, spread reflections off the face of the solar panels would not be prevented. Therefore, the color contrast of the solar panels during certain times of the day when the viewer is positioned in line with the sun would momentarily increase, but not to such an extent as to result in a change in the severity of the contrast rating in Table 4.19-3.

There would be no impact to DoD air navigation associated with Yuma Proving Ground. Appendix E of the DRECP (BLM 2016) states that "photovoltaic systems on or near SUAs [Special Use Airspace] or MTRs [Military Training Routes] present little to no conflict to military operations, testing, or training."

Decommissioning

The decommissioning of the Project would be similar to the construction activities described earlier, though the duration of decommissioning would be shorter than the duration of construction. Decommissioning would include demolition and removal of above-ground and subsurface facilities and site contouring and restoration. After removal of the facilities, a strong color contrast would be evident between graded, disturbed areas devoid of vegetation and undisturbed natural areas in the Project vicinity. Due to difficult growing conditions and the length of time needed for reclamation to mature in the desert, the visual contrast related to land disturbance would remain for quite some time. Implementation of mitigation measures VIS-1 and VIS-4 would aid greatly in reducing the visual effects of decommissioning. VIS-4 would require the Decommissioning and Site Restoration Plan to include reclamation of the area of disturbed soils used for laydown, Project construction, and siting of the other ancillary operation and support structures. Further, VIS-4 would reduce the amount of disturbed area and blend the disturbed areas into the characteristic landscape. It would require replacement of soil, brush, rocks, and natural debris over disturbed areas. Newly introduced plant species would be of a form, color, and texture that blends with the landscape. These measures would ensure the visual impacts of decommissioning are minor and short-term.

Impacts to Special Designations

Due to the distance between the Project and nearby wilderness areas, it is unlikely that the Project would be visible from the adjacent wilderness areas, and there is no anticipated visual resource impact to these areas. As stated above, visual resource impacts would not be experienced from the Chuckwalla ACEC (KOP 2). However, due to discordance between the Project and the natural landscape of the Chuckwalla Valley, the overall scenic quality rating would decrease from B to C for the Chuckwalla Valley SQRU (21), where the Chuckwalla ACEC is located. Impacts to the Mule Mountains ACEC are described above in reference to KOP 4. There would be a strong visual contrast when viewing the Project from KOP 4 during construction and operation of the Project. The Mule Mountains ACEC is located in SQRUs 037 and 038. The scenic quality classification of C would remain for SQRU 037, though the rating for SQRU 038 would be lowered from B to C.

4.19.3.2 Alternative 2: Resource Avoidance Alternative

The direct and indirect impacts of the Resource Avoidance Alternative are similar or the same as the impacts of the Proposed Action, although the size of the facility would be reduced, with no solar panels located in the northwestern corner of the Project site. The degree to which the visible extent of the DQSP under Alternative 2 would be reduced would depend on viewing relationships. A reduction in the disturbance area of Alternative 2, particularly in the northwestern corner of the site, may result in reduction in visibility of the Project from a portion of I-10 (KOP 1a-h) and KOP 6 (Nicholls Warm Springs/Mesa Verde) due to the at-grade view from these KOPs. The reduction in disturbance area of Alternative 2 may also result in a slight reduction in the scale of the Project when viewed from KOP 3 (McCoy Mountains). However, the slight changes in visibility would not change the visual contrast ratings presented in Table 4.19-3 for KOPs 1, 3, or 6.

Because the size of the O&M area and the need for security lighting would remain the same under Alternative 2, impacts related to light and glare would be the same or similar compared to the

Proposed Action. Under Alternative 2, the gen-tie line would be longer than under the Proposed Action (3.94 miles in Alternative 2 versus 2.79 miles in the Proposed Action). The western portion of the gen-tie line, from the CRSS to the northwestern corner of the Project area, would be the same as for the Proposed Action. From the northwestern corner to the Onsite Substation, the route of the gen-tie line under Alternative 2 would be located between 1,000 to 2,000 feet south of the route in the Proposed Action.

As with the Proposed Action, Alternative 2 would have no visual contrast at KOPs 8 and 5 due to the large distance, and would have weak visual contrast at KOPs 1, 2, and 7 due to low visibility and screening from topography. From KOPs 1, 2, 3, and 6, the gen-tie line under Alternative 2 would be farther from the KOP than under the Proposed Action. Because multiple transmission lines are currently situated between these KOPs and the Alternative 2 gen-tie line, the line under Alternative 2 would be less visible, and present less visual contrast, than the Proposed Action.

The viewscape that would differ the most between the Proposed Action and Alternative 2 would be that from KOP 4. As described for the Proposed Action, the gen-tie line would have a weak visual contrast at KOP 4 (as well as 3 and 6) due to existing transmission line structures in the area. Under Alternative 2, the gen-tie would be 1,000 to 2,000 feet closer to KOP 4, suggesting the potential for an increased visual contrast. However, the distance between the KOP and the gen-tie line is approximately 3 miles, and a realignment of fewer than 2,000 feet closer would not make a noticeable difference in the visual presence of the gen-tie line.

All mitigation measures identified for the Proposed Action would be applicable to Alternative 2 and would result in a similar degree of reduction in the apparent visual contrast caused by Alternative 2.

Construction

Construction of Alternative 2 would be similar to the Proposed Action and, therefore, visual impacts from Project construction equipment, workers, site grading, vegetation removal, and lighting would be the same as those described for the Proposed Action. Due to the slightly smaller footprint of the Project, the geographic extent of these impacts would be smaller.

Operation and Maintenance

Alternative 2 operation and maintenance impacts would be essentially the same as Alternative 1. No visual simulations were created for Alternative 2. However, the appearance of the solar facilities under Alternative 2 would be similar to the visual simulations for Alternative 1. As discussed above, compared to Alternative 1, Alternative 2 may be less visible from a portion of I-10 (KOP 1a-h) and KOP 6 (Nicholls Warm Springs/Mesa Verde) due to the at-grade view from these KOPs and the absence of solar panels in the northwestern corner of the site. The scale of the Project when viewed from KOP 3 (McCoy Mountains) may also be slightly smaller for Alternative 2. However, the slight changes in visibility would not change the visual contrast ratings presented in Table 4.19-3 for KOPs 1, 3, or 6.

The potential for glint and glare under Alternative 2 would be reduced from that in the Proposed Action. As discussed in Section 2.5, the thin-film panels proposed under Alternative 2 are treated with an anti-reflective coating (ARC). The effect of ARC is to reduce the reflectance of glass panels at all but the most extreme angles of incidence (First Solar Application Note PD-5-330,

Rev. 1.4). Although ARC would not eliminate all potential for glare, it would substantially decrease the duration of impact as compared to untreated panels, because it would only allow glare at the highest angles of incidence.

Decommissioning

Visual impacts from decommissioning of Alternative 2 would be the same as those described for the Proposed Action, though due to a slightly smaller footprint, the geographic extent of these impacts would be smaller.

4.19.3.3 Alternative 3: Reduced Project Alternative

The direct and indirect impacts of the Reduced Project Alternative are similar or the same as the impacts of the Proposed Action, although the size of the facility would be reduced with no solar panels located in the northwestern corner of the Project site (similar to Alternative 2) and a reduced number of panels along the eastern side of the site. A reduction in the disturbance area of Alternative 3, in both the northwestern corner and eastern side of the site, may result in an even greater reduction in visibility of the Project from a portion of I-10 (KOP 1a-h) and KOP 6 (Nicholls Warm Springs/Mesa Verde) due to the at-grade view from these KOPs, as compared to Alternative 2. The reduction in disturbance area of Alternative 3 may also result in a greater reduction in the scale of the Project when viewed from KOP 3 (McCoy Mountains) though the solar facilities would still dominate the view from this KOP. In addition, Alternative 3 may be even less visible from KOP 7 (Town of Ripley) due to the absence of panels along the eastern edge of the site, thus increasing the distance between the KOP and the first visible panels for this at-grade view. However, the changes in visibility would not change the visual contrast ratings presented in Table 4.19-3 for KOPs 1, 3, 6, or 7.

Because the size of the O&M area and the need for security lighting would remain the same under Alternative 3, impacts related to light and glare would be the same or similar compared to the Proposed Action. Under Alternative 3, the gen-tie line would be the same as that proposed for Alternative 2, and the visual impacts would be the same. All mitigation measures identified for the Proposed Action would apply to Alternative 3 and would result in a similar degree of reduction in the apparent visual contrast caused by Alternative 3.

Construction

Construction of Alternative 3 would be similar to the Proposed Action and, therefore, visual impacts from Project construction equipment, workers, grading, vegetation removal, and lighting would be the same as those described for the Proposed Action. Due to the smaller footprint of the Project and shorter construction schedule, the geographic extent and duration of these impacts would be smaller.

Operation and Maintenance

Alternative 3 operation and maintenance impacts would be essentially the same as Alternative 1. No visual simulations were created for Alternative 3. However, the appearance of the solar facilities under Alternative 3 would be similar to the visual simulations for Alternative 1. As discussed above, compared to Alternative 1, Alternative 3 may be less visible from a portion of I-

10 (KOP 1a-h), KOP 6 (Nicholls Warm Springs/Mesa Verde), and KOP 7 (Town of Ripley) due to the at-grade view from these KOPs and the absence of solar panels in the northwestern corner and along the eastern edge of the site, which thus both reduces the width of the Project when viewed from these KOPs and/or increases the viewing distance from the KOP to the first visible panel. The scale of the Project when viewed from KOP 3 (McCoy Mountains) may also be smaller for Alternative 3, though the Project would still dominate the view from this location. However, the changes in visibility would not change the visual contrast ratings presented in Table 4.19-3 for KOPs 1, 3, 6, or 7.

The potential for glint and glare under Alternative 3 would be reduced from that in the Proposed Action. As discussed in Section 2.5, the thin-film panels proposed under Alternative 3 are treated with an anti-reflective coating (ARC). The effect of ARC is to reduce the reflectance of glass panels at all but the most extreme angles of incidence (First Solar Application Note PD-5-330, Rev. 1.4). Although ARC would not eliminate all potential for glare, it would substantially decrease the duration of impact as compared to untreated panels, because it would only allow glare at the highest angles of incidence.

Decommissioning

Visual impacts from decommissioning of Alternative 3 would be the same as those described for the Proposed Action, though due to a smaller footprint, the geographic extent of these impacts would be smaller.

4.19.4 Application of CEQA Significance Thresholds

VIS-1) Would the Project have a substantial adverse effect on a scenic vista?

Alternatives 1, 2, or 3 would not be located in a designated scenic vista. Neither the Riverside County General Plan (Riverside County 2015a) nor the Palo Verde Valley Area Plan (Riverside County 2015b) designates the Project site as an important visual resource. Therefore, no impacts would occur.

VIS-2) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Though Riverside County has identified I-10 as eligible for designation as a scenic corridor, it is not a state- or County-designated scenic highway. I-10 was included as KOP 1 (a-h) in the visual resources impact assessment. Alternatives 1, 2, or 3 would be consistent with visual policies contained in the Riverside County General Plan (Riverside County 2015a), Palo Verde Valley Area Plan (Riverside County 2015a), and the City of Blythe General Plan 2025 (2007). Policies to protect the scenic quality of views from designated and eligible scenic highways are contained in the County's General Plan and the Palo Verde Valley Area Plan. Distribution lines and the gen-tie line would be placed above-ground and would be within view of I-10, an eligible scenic highway, though the distance of I-10 to the Project and presence of other electrical transmission poles would lessen the visual impact of the Projects transmission lines. However, because the transmission lines for Alternatives 1, 2, or 3 would be above ground and at least partially visible from I-10, the distribution and gen-tie lines would not be consistent with the Riverside County General Plan LU

Policy 14.5 requiring new electric distribution lines, which would be visible from designated or eligible state and County Scenic Highways, to be placed underground.

Motorists on I-10 enjoy scenic desert views across the Palo Verde Mesa to the mountains. Due to its low profile, the Project would not block motorists' views of the mountains, which would remain visible in the distance beyond the Project. It is estimated that the Project would be visible for a 4-mile segment of I-10 located north of the Project due to the elevation of I-10 above the Project in this section. Given the adjacent land uses, which include other solar facilities, the fact that the Project's gen-tie line would be close to and parallel to other existing transmission lines, and the distance between I-10 and the Project, Alternatives 1, 2, or 3 would be compatible with policies to protect scenic views from I-10. There are no scenic resources such as significant trees, rocks, historic buildings, or prominent topographic features that would be degraded due to Alternatives 1, 2, or 3. Therefore, no substantial adverse effects to scenic resources would occur and impacts would be less than significant.

VIS-3) Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

Alternatives 1, 2, or 3 would be visible from portions of the nearby mountains (Mule and McCoy Mountains - KOPs 3 and 4), the adjacent housing development (Nicholls Warm Springs/Mesa Verde KOP 6), and along a 4-mile stretch of I-10 (KOP 1a-h) due to an elevation above the Project site and/or close proximity to the Project site. The broad, flat form of the solar panels, along with the dark grey color of the panels would strongly contrast with the desert landscape surrounding the Project and would dominate the landscape from the mountain views due to the large scale of the project and would be apparent from the I-10 and nearby development views. During construction of Alternatives 1, 2, or 3, the density and movement of construction workers and vehicles, as well as the appearance of cleared/graded areas, would contrast with the surrounding desert landscape. Therefore, during both construction and operation, Alternatives 1, 2, or 3 would degrade the existing visual character of the site and surrounding areas, particularly from elevated positions where the Project would be visible.

Alternatives 1, 2, or 3 (both during construction and operation) would be discordant with the existing naturally appearing visual character of the Chuckwalla Valley and would reduce the scenic quality of the Project area due to an increase in man-made development at the site. The overall scenic quality of the site would be reduced from a B to a C. Therefore, Alternatives 1, 2, or 3 would reduce the visual quality of the site, as well as the quality of surrounding areas that include views of the Project, particularly from nearby vantage points in the Mule and McCoy Mountains.

Though the existing visual character of the Project site is already influenced by existing transmission lines and other energy projects, Alternatives 1, 2, or 3 would result in substantial degradation of the existing visual character and visual quality of the Project site when viewed from elevated locations. Mitigation Measures VIS-1, 2, 3 and 4 would reduce visual contrast of Alternatives 1, 2, or 3 during construction, operation and decommissioning; however, these measures would not fully mitigate the significant visual impact of the Project. Therefore, Alternatives 1, 2, or 3 would result in a significant and unavoidable impact.

VIS-4) Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Solar PV employs glass panels that are designed to minimize reflection and reflect as little as 2 percent of the incoming sunlight (FAA 2010). Nevertheless, some glare is possible from the surface of the PV panels and other DQSP components (especially metallic components) that reflect light depending on panel orientation, sun angle, viewing angle, viewing distance, and other factors. It is possible that minor glare could be produced from back reflected light or light not absorbed by DQSP facilities. This glare could occur in any one place for several hours (e.g., a sunny afternoon), but is unlikely to be visually distracting or nuisance causing, though the glare produced by the DQSP could be more intense than any other natural or cultural features in an observer's perspective. The color contrast of the dark grey solar panels of the Project and the surrounding desert colors could be increased by glare produced from diffuse reflections of the DQSP, but would not create substantial glare that would adversely affect day or nighttime views in the area.

During construction of Alternatives 1, 2, or 3, security lighting would be needed at the construction staging areas, parking area, construction office trailer entries, site access points, and the security guard booth. Limited lighting would be installed around the construction office trailers. If needed for security, small lights with motion sensors may be installed on the outside perimeter of construction office trailers and/or portable light plants may be installed in a laydown yard or parking area. In addition, portable light towers may be used if, due to schedule or heat constraints, construction activities were to occur at night. During operation and maintenance of Alternatives 1, 2, or 3, lighting would be placed at the O&M Building, On-Site Substation, and site entrance. Some portable lighting may also be required for maintenance activities that must be performed at night. There would be no lighting along the Project perimeter. Lighting would be kept to a minimum and sensors and switches would be utilized to keep lighting off when not needed. All lights would be shielded and face downwards as much as possible. Therefore, Alternatives 1, 2, or 3 would not create substantial light that would adversely affect day or nighttime views in the area. Overall, impacts related to light and glare from Alternatives 1, 2, or 3 are anticipated to be less than significant.

VIS-5) Would the Project result in the creation of an aesthetically offensive site open to public view?

The general public would primarily view Alternatives 1, 2, or 3 temporarily from a 4 mile stretch of I-10 where the Project would be visible due to the elevation of the highway above the Project. The Project would also be visible to viewers at elevated positions in the Mule and McCoy Mountains (KOPs 3 and 4), as well as viewers in the nearby development of Nicholls Warm Springs/Mesa Verde. The broad, flat form of the solar panels, along with the dark grey color of the panels would contrast with the desert landscape surrounding the Project and would be apparent or dominate the landscape from these views and would reduce the scenic quality of the Project area due to an increase in man-made development at the otherwise natural appearing site.

However, the experience of viewers at most of the locations where the Project would be visible would be intermittent. The Project area is also being subjected to an increased amount of similar development with additional solar projects and transmission lines anticipated for construction in the near future. Though Alternatives 1, 2, or 3 would change the visual character of the site, the Project area is already influenced by nearby energy projects (Modified BSPP, Blythe Substation,

Blythe Energy Center, etc.) and will continue to be modified when new energy projects are built. Therefore, Alternatives 1, 2, or 3 would not alter the site in a manner that would create a substantially aesthetically offensive site open to public view. Thus, impacts would be less than significant.

VIS-6) Would the Project interfere with nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?

Alternatives 1, 2, and 3 are over 100 miles east of the Mt. Palomar Observatory, which greatly exceeds the distance from the Observatory's areas of sensitivity (Zone A at a 15-mile radius and Zone B at a 45-mile radius from the Observatory). Therefore, there would be no impacts to astronomical observation and research at the Mt. Palomar Observatory.

VIS-7) Would the Project expose residential property to unacceptable light levels?

Construction and operation of Alternatives 1, 2, or 3 would utilize minimal lighting. Additionally, the proposed Project facilities would be close to existing sources of light, such as the Blythe Energy Center, Blythe Substation, the NRG Blythe Solar PV Project, and the Blythe Airport. Therefore, residential property would not be exposed to unacceptable light levels, and impacts would be less than significant.

4.19.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.19 would be maintained. Existing land uses would continue uninterrupted, and there would be no impact on visual resources.

4.19.6 Cumulative Impacts

Impacts resulting from construction, operation, maintenance, and decommissioning of the DQSP could result in a cumulative effect on visual resources in combination with other past, present, or reasonably foreseeable future actions. The geographic scope of the cumulative effects analysis for visual resources consists of the viewshed of the I-10 corridor (where visual impacts could be synergistic), and locations from which a viewer could see the Proposed Action along with views of other projects (where visual impacts could be additive). Potential cumulative effects on visual resources could occur during the DQSP's proposed 25 to 48-month construction period (e.g., from cumulative construction disturbances), during the 30-year term of the authorizations and permits for the Proposed Action (e.g., project contrast with the landscape, glint and glare), or result from closure and decommissioning (e.g., until restoration efforts return the landscape to its original condition). Cumulative visual impacts could occur as long as the DQSP contributes to visual changes to the landscape that are visible or perceived by the public, either within the same viewpoints, or as a noticeable element in a cumulative viewing experience (i.e., an OHV travel route, a drive on I-10, or a local road).

Existing conditions within the area of cumulative effects analysis reflect a combination of the natural condition and the effects of past actions, and are described in Chapter 3. Direct and indirect effects of the DQSP are analyzed above. The cumulative analysis provided here considers implementation of the Project in combination with other past, present, and reasonably foreseeable future projects described in Tables 4.1-1 and 4.1-2. Among them, projects such as the Palen, Blythe Airport, Modified Blythe, Desert Harvest, RE Crimson, and BMSPP solar power projects, as well as numerous solar projects proposed on lands under County jurisdiction, are expected to result in synergistic visual impacts for travelers along I-10, as well as additive visual impacts to dispersed recreation users on BLM lands on the Palo Verde Mesa and local roads.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

Due to the visual contrast of the solar panels with the natural landscape of the Chuckwalla Valley, the Project would begin to attract attention and begin to dominate the characteristic landscape. Landscape character changes to the elements of form and texture would be primarily perceived from superior (higher elevation to the Project) locations; color and line element changes are expected to be weak. The degree of visual contrast caused by the DQSP solar field, as experienced from the eight KOPs, ranged from “none” to “strong”.

The cumulative scenario for visual resource impacts, especially the viewshed impacts of utility-scale solar energy projects, has been evaluated in detail in the Western Solar Plan issued in July 2012 (BLM and DOE 2012). The specific solar technologies and the precise locations of projects were not known, however, the Riverside East Solar Energy Zone (SEZ) provides a useful approximation of the likely cumulative visual impact to be expected should all projects listed in Section 4.1 be developed. The projects in the cumulative scenario located on and adjacent to the Palo Verde Mesa, as well as south of I-10 and west of Blythe, are generally coincident with the SEZs analyzed in the Western Solar Plan.

Because of the large size of the Riverside East SEZ, the area’s topography, and the general lack of screening vegetation, the viewshed of the SEZ is enormous. Within 25 miles of the SEZ, utility scale solar energy projects theoretically could be visible within an area of more than 2,100,000 acres (DOI 2010). The viewshed includes large portions of the mountain ranges surrounding the Chuckwalla Valley and some neighboring valleys, including Ward and Rice Valleys, and the Pinto Basin. The affected lands that are common to both the DQSP and the Riverside East SEZ include I-10, but do not include sensitive visual resource areas such as Wilderness areas because the DQSP is not visible from the nearby wilderness areas. The DQSP’s viewshed is wholly encompassed by the viewshed of the Riverside East SEZ.

The main conclusion reached in the visual analysis of the SEZ is that visually complex, man-made industrial landscapes would contrast greatly with the surrounding lands, which are generally naturally appearing. Large visual impacts on the SEZ and surrounding lands within the SEZ viewshed would be associated with solar energy development due to major modification of the character of the existing landscape. This conclusion indicates that the cumulative scenario would result in a visual impact that is inconsistent with the Interim VRM objectives that have been established in the DQSP area as described in Section 3.19.1.6 (VRM Class III). The analysis in the Western Solar Plan also indicates that the most effective mitigation measures would be proper facility siting and layout, and that other mitigation measures addressing facility color and/or edge

contrasts, due mostly to the size and scale of the foreseeable developments, would have a limited ability to appreciably reduce visual impacts from highly exposed areas.

In summary, the large-scale, closely spaced nature of projects results in a cumulative scenario that would have major adverse impacts on the visual values in the visual resources cumulative geographic scope (BrightSource 2011). Commonly employed visual mitigation measures, such as those proposed in this section, would slightly reduce the cumulative visual impacts, but not to such a degree as to avoid or substantially reduce the impacts to visual values of the region. The cumulative impact would be long-term, adverse and unavoidable. The following sections provide additional details on the type and severity of cumulative visual impacts that would be experienced from each of the KOPs, from I-10, and for dispersed recreation users.

Impacts on KOPs/Visual Contrast Ratings

In general, the addition of the cumulative projects to the views from KOPs 1 through 8 would affect some views more than others, depending on topography and location of the cumulative projects relative to the KOPs. For KOPs 5 (Bradshaw Trail) and 8 (Colorado River), where no contrast was identified for the DQSP, it is unlikely that the addition of the cumulative projects would increase the contrast substantially due to the topography and distance between the cumulative projects and these at-grade KOPs, making it difficult to see the cumulative projects from these KOPs. For KOPs 2 (Chuckwalla ACEC) and 7 (Town of Ripley), where weak contrast was identified for the DQSP, the change in contrast would vary. For KOP 7, the addition of the cumulative projects would be unlikely to change the contrast substantially due to the distance between the cumulative projects and the at-grade KOP. However, for KOP 2, contrast may change from weak to strong because the KOP could be adjacent to or within one to two new solar projects, the RE Crimson and Mule Mountain III projects. KOP 1a-h (I-10) is discussed below in the discussion of impacts to the I-10 corridor. The remaining KOPs, 3 (McCoy Mountains), 4 (Mule Mountains), and 6 (Nicholls Warm Springs/Mesa Verde), were found to have moderate-strong or strong contrast with the DQSP. With the addition of the cumulative projects, a strong contrast would likely remain for KOPs 3 and 4, and the contrast for KOP 6 may increase to strong due to additional solar development adjacent to the DQSP. The estimated visual contrast created by the cumulative scenario from each of the KOPs discussed in Section 4.19.3.1 is shown in Table 4.19-5. In sum, the cumulative scenario would have adverse and unavoidable visual resource impacts for over half of the KOPs that could not be sufficiently mitigated with feasible mitigation measures.

Motorists on I-10

Visual changes as a result of other projects both east and west of the DQSP in the cumulative scenario, including the Blythe Airport, RE Crimson, Mule Mountain III, Blythe Energy Project II, and the BMSP, would be visible to travelers on I-10, who would also experience limited views of the DQSP for a four mile stretch of I-10. The combined effect of large-scale landscape alterations from these solar projects, which would be visible along the length of I-10, would substantially degrade the visual character and the general scenic appeal of the existing desert landscape.

Table 4.19-5. Estimated Visual Contrast of Cumulative Scenario

ID	Name	Visual Contrast of DQSP	Estimated Visual Contrast of the Cumulative Scenario	Contribution of the DQSP to the Cumulative Visual Contrast
1	Interstate 10 (a-h)	Moderate	Strong. The number and size of the solar projects along the I-10 corridor would provide strong contrast to the natural desert landscape of the corridor.	Minor. The DQSP would only be visible for a short distance on I-10 (4 miles). There would be several other projects, which would, in total, transform the I-10 corridor into an industrial energy production landscape from an open desert landscape.
2	Chuckwalla ACEC	None-Weak	Strong. The KOP would be located adjacent to or within two large solar developments, Mule Mountain III and RE Crimson.	Minor. There would be low visibility of the DQSP from this KOP; if built, the other solar projects would dominate the view from this KOP.
3	McCoy Mountains	Strong	Strong. With the addition of the cumulative projects, the view from this elevated KOP would become increasingly developed and discordant with the natural desert landscape.	Major. The DQSP would dominate the view from this KOP, though additional projects would increase the scale and width of the view of solar projects.
4	Mule Mountains	Strong	Strong. With the addition of the cumulative projects, the view from this elevated KOP would become increasingly developed and discordant with the natural desert landscape.	Major. The DQSP would dominate the view from this KOP, though additional projects would increase the scale and width of the view of solar projects.
5	Bradshaw Trail	None	None. Due to distance to the cumulative projects and intervening topography, the cumulative projects would likely not be visible from this KOP.	None.
6	Nicholls Warm Springs/Mesa Verde	Moderate-Strong	Strong. Due to additional solar development adjacent to DQSP that would likely be visible from the KOP, the contrast would increase to strong as the view became more dominated by solar development.	Moderate-Major. The DQSP would be the largest solar project visible from this KOP, though additional projects would increase the scale and width of the view of solar projects from this KOP.
7	Town of Ripley	Weak	Weak. It is unlikely that the cumulative projects would be readily visible from this KOP due to distance from the KOP to the cumulative projects.	Minor. Due to its location, the DQSP would be the closest Project to the KOP and therefore the most visible, though the Project is not apparent from the KOP.

Table 4.19-5. Estimated Visual Contrast of Cumulative Scenario

ID	Name	Visual Contrast of DQSP	Estimated Visual Contrast of the Cumulative Scenario	Contribution of the DQSP to the Cumulative Visual Contrast
8	Colorado River	None	None. Due to distance to the cumulative projects, they would not be visible from this KOP.	N/A

Numerous existing cultural modifications are visible from the I-10 corridor, including transmission lines, pipelines, 4-wheel drive tracks, and widely scattered facilities and structures; however, the general character is of an unimpaired, isolated desert landscape. The cumulative scenario includes many large-scale solar plants whose scale, potential glare, color, and pervasiveness would adversely impact the continued existence of the general character of the I-10 corridor. Though considered unlikely, if all the cumulative projects included in Section 4.1 were to be implemented, tens of thousands of acres within the I-10 corridor viewshed between Desert Center and Blythe (approximately 50 miles) would be converted from undeveloped desert to a more industrialized appearance, with solar projects blending together into large swaths of developed landscape.

However, in many cases, favorable topography would diminish the apparent scale of the projects from motorists' perspective. The cumulative projects are at the same or similar elevation as the highway, and thus are reduced in prominence due to their distance from the highway and low angle of view, as is the case for the DQSP. In many cases, the other projects in the cumulative scenario would blend in with the horizon line of the valley floor, and the rugged mountains would remain the dominant visual features in the landscape, although this is decreasingly the case further west toward Desert Center where I-10 is elevated relative to the proposed solar energy developments. Because the landscape is currently undeveloped and valued by visitors for its isolated and unspoiled condition, the addition of numerous new large-scale solar projects would substantially degrade the scenic experience for east and westbound travelers along I-10, due to the projects' industrial character and visual contrast.

Mitigation measures are available that partially reduce the color contrast of some structures, or the line contrast of vegetation clearing; however, the mitigation measures only reduce the contrast of certain features of the projects at various distances. Due to the size, extent and geographic dispersal of renewable energy projects in the cumulative scenario along I-10, mitigation measures would be insufficient to substantially reduce the visual impacts of the cumulative scenario. Though considered unlikely, if all of the cumulative projects were constructed, travelers along I-10 between Desert Center and Blythe would have very few views of an undisturbed desert landscape. For these reasons, the cumulative scenario would have a moderate to major (depending on visual sensitivity and visual exposure factors) adverse impact on the I-10 corridor. Thus, the cumulative scenario would present a significant and unavoidable impact for travelers along I-10 that could not be feasibly mitigated.

Dispersed Recreation Users in Surrounding Mountains

The DQSP, in combination with other projects, would make the valleys surrounding the Mule and McCoy Mountains appear increasingly industrialized, and could substantially diminish the remote

and isolated character of the landscape. While use levels in the mountains surrounding the DQSP are generally low, the remote and isolated character of the landscape is highly valued by its users.

Available mitigation measures could not feasibly reduce the scale and contrast created by development of the cumulative projects, especially from elevated viewpoints. Even with mitigation, visitors to the higher elevation locations in the region (the McCoy and Mule Mountains) would be exposed to large-scale renewable energy developments on valley floors from multiple locations and in several view directions, causing a substantial adverse impact on solitude and other backcountry values. Thus, the cumulative scenario presents a significant and unavoidable impact for dispersed recreation users in the surrounding, higher-elevation mountains.

Summary

The Project would not contribute to adverse cumulative effects on any scenic vistas (VIS-1) or on scenic resources within a State scenic highway (VIS-2), would not contribute to cumulative creation of an aesthetically offensive site open to public view (VIS-5), and would not contribute to interference with nighttime use of the Mt. Palomar Observatory (VIS-6).

The Project would result in substantial degradation of the existing visual character and visual quality of the Project site when viewed from elevated locations. Even with implementation of Mitigation Measures VIS-1, 2, 3 and 4, the incremental impact of the Project when added to other past, present, and reasonably foreseeable future projects would be cumulatively considerable.

The Project would not contribute to adverse cumulative effects related to substantial light or glare that would adversely affect day or nighttime views in the area (VIS-4) or contribute to unacceptable light levels (VIS-7).

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The cumulative impacts for Alternative 2 would be similar to those for Alternative 1, though the contribution of the DQSP to impacts from KOPs 1, 3 and 6 may be reduced due to the slightly narrower width of the Project and increased distance of the solar panels from these KOPs, thus slightly decreasing the visibility of the Project from these KOPs or reducing the scale of the solar Project when viewed from the KOPs. However, the changes in visibility would not change the visual contrast ratings presented in Table 4.19-5.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The cumulative impacts for Alternative 3 would be similar to those for Alternative 1, though the contribution of the DQSP to impacts from KOPs 1, 3 and 6 may be reduced due to the narrower width of the Project and increased distance of the solar panels from these KOPs, thus decreasing the visibility of the Project from these KOPs or reducing the scale of the solar Project when viewed from the KOPs. However, the changes in visibility would not change the visual contrast ratings presented in Table 4.19-5.

Alternative 4 – No Action

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project, and the DQSP would not be implemented. The public lands in the Project area would continue to be managed by BLM in accordance with existing land use designations in the CDCA Plan, which could include a different solar project, or other development. Alternative 4 would not contribute to cumulative visual impacts.

4.19.7 Residual Impacts

The implementation of Mitigation Measures VIS-1 through VIS-4 would reduce, but not eliminate, adverse cumulative impacts to KOPs. These residual impacts of the Project and alternatives would be unavoidable.

4.20 Water Resources

4.20.1 Methodology for Analysis

This analysis of potential impacts of the Proposed Action and Alternatives on water resources includes an evaluation of groundwater supply and recharge, water quality (both surface water and groundwater), potential for flood damage, stormwater flow, and springs.

4.20.1.1 CEQA Significance Criteria

The criteria listed below were used to determine if the Project would have significant impacts to water resources. These criteria are the same as the significance criteria listed in the CEQA Environmental Checklist, Appendix G of the state CEQA Guidelines. Under CEQA, the proposed Project and alternatives would have a significant impact on water resources and require mitigation if they would:

HYD-1) Violate any water quality standards or waste discharge regulations.

HYD-2) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

HYD-3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

HYD-4) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

HYD-5) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

HYD-6) Otherwise substantially degrade water quality.

HYD-7) Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

HYD-8) Place within a 100-year flood hazard area structures which would impede or redirect flood flows.

HYD-9) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

HYD-10) Be at risk of inundation by seiche, tsunami, or mudflow.

The following additional significance criteria from the County of Riverside CEQA Environmental Assessment Form are used in the analysis. A project could have potentially significant impacts if it would:

HYD-11) Include new or retrofitted Stormwater Treatment Control BMPs (e.g., water quality treatment basins, constructed treatment wetlands), the operation of which could result in significant environmental effects (i.e., increased vectors and/or odors).

HYD-12) Cause changes in absorption rates or the rate and amount of surface runoff.

HYD-13) Cause changes in the amount of surface water in any water body.

4.20.2 Applicant-Proposed Measures

Section 4.9.2 describes APMs and management plans intended to address hazardous materials handling and disposal. Those measures would be protective of water quality, and would therefore be applicable to protection of water resources.

The Applicant has developed a preliminary summary of a SWPPP, which would be developed and implemented prior to Project construction. The SWPPP would define Best Management Practices (BMPs) to be used to minimize the potential for the Project to modify onsite stormwater flow and erosion characteristics. The SWPPP will include the following information:

1. Sequence of construction events and identification of potential pollutants on the Project site;
2. Calculation of the potential disturbance area;
3. Identification of streams and wetlands, in vicinity of Project;
4. Description of proposed storm water pollution control measures;
5. Summary of applicable regulatory requirements;
6. Inspection, monitoring, and maintenance procedures;
7. Site restoration measures; and
8. Minimum training and reporting requirements

The SWPPP will also contain site map(s) that show the construction site perimeter; existing and proposed structures and roadways; storm water collection and discharge points; and drainage patterns across the site both before and after construction.

The erosion and sediment control measures discussed in the SWPPP will serve as minimum standards during construction. The SWPPP will describe the physical erosion and sediment control measures that would be implemented, including filter fabric fence, palliatives, geotextiles, and straw bales. The SWPPP will define the locations of these measures, and potential alternatives and limitations for each measure. In general, the measures would address stormwater, sedimentation, and erosion impacts by:

- Minimizing the quantity and duration of soil exposure to stormflow;
- Protecting critical areas during construction by reducing the velocity of and redirecting runoff;
- Installing and maintaining erosion and sediment control measures during construction; and
- Inspecting the work area and maintaining erosion and sediment controls as necessary until final stabilization is achieved.

To achieve this, the following BMPs for initial site stabilization and construction entrance installation would be implemented:

- Project area boundaries (e.g. workspace limits) will be clearly delineated and the contractor will ensure that no stabilization structures are installed outside the Project extent;
- Grading plans would be developed to minimize the amount of vegetation to be removed;
- Filter fabric fence will be installed along Project borders that have the potential to release sediment into receiving waters or other environmentally sensitive areas;
- Storm drain protection barriers will be installed around any storm drain inlet, catch basin or culvert present within the Project area; and
- Stabilized construction entrance/exits to public right-of-ways will be installed.

Where feasible, stemmed vegetation such as brush, shrubs and trees shall be removed at or near the ground level, leaving the root systems intact to stabilize the soil. Preservation of existing vegetation is one of the most effective methods of erosion control and storm water management, and the contractor shall only remove the vegetation required to complete the Project. Temporary erosion control measures (such as sediment barriers) will be installed to contain disturbed soils within the work area during clearing and grading activities that have the potential to release upland soil sediment into adjacent water bodies or environmentally sensitive areas. All temporary soil stockpiles will be placed in upland areas and surrounded by filter-fabric fence.

Because Project water use is almost entirely associated with dust control during construction, the measures associated with the Applicant's Phased Site Preparation Plan would be used to conserve water where feasible. Although grading would be necessary in some parts of the site, the measures used to phase construction, control vehicle speed, cover stockpiles, minimize the amount of disturbed ground, and maintain existing vegetation, where feasible, would also result in minimizing water use. In addition, the use of soil stabilizers would minimize the need to use water to control dust in those areas.

As discussed in Section 4.1.6, the impact analysis assumes that the APMs have been implemented, and these measures are therefore requirements for approval of the Project. The APMs are to be incorporated into the EICMPP/MMRCP, along with the agency-required mitigation measures.

4.20.3 Direct and Indirect Impacts

4.20.3.1 Alternative 1: Proposed Action

Construction

Some impacts related to ground disturbance, such as those relating to surface water and drainage patterns and flood hazard areas, would begin during the construction phase and continue throughout the operation and maintenance phase, and are therefore described below under *Operation and Maintenance*. Where appropriate, a distinction is made between temporary impacts, which would occur during construction only, and long-term impacts, which would occur during both phases.

Groundwater Supply and Recharge

The analysis of impacts to groundwater supply and recharge is based on modeling of the anticipated effect of Project-related groundwater withdrawal on the overall groundwater balance in the Palo Verde Groundwater Basin (PVGB), the effect of groundwater withdrawal on the PVID drains, and the effect of the withdrawal on nearby groundwater wells.

The PVGB is made up of two components: the Palo Verde Mesa Groundwater Basin (PVMGB), and the Palo Verde Valley Groundwater Basin (PVVGB). The PVVGB comprises the floodplain of the Colorado River. Although the solar projects, including the DQSP, are situated on the PVMGB, BLM has typically evaluated the PVGB as a whole, in order to ensure that project effects on the Colorado River are understood. Therefore, the analysis in this Final PA/EIS/EIR evaluates the entire PVGB.

BLM has previously analyzed the effect of groundwater withdrawal for solar plant construction in the PVGB in their Environmental Impact Statements (EISs) for the BSPP (BLM 2010), the MSEP (BLM 2012b); and the Modified BSPP (BLM 2014). The analyses were based on a numerical groundwater flow model originally developed by the U.S. Geological Survey (USGS; Lieke 2008). In 2013, BLM contracted with Argonne National Laboratory to develop a groundwater model to assess the impacts of solar development in the Riverside East SEZ on water resources. That effort concluded that, even under the high water demand scenario, groundwater drawdown would not affect the Colorado River Accounting Surface (Argonne 2013).

The Applicant for the BSPP adapted the USGS model to support BLM's analysis of groundwater withdrawal impacts for that project (AECOM 2010). That analysis concluded that groundwater drawdown of 0.1 feet would be limited to the Palo Verde Mesa Groundwater Basin (PVMGB), and would not extend into the adjacent PVVGB or the Colorado River. The numerical model for the BSPP was then modified in 2011 to support BLM's analysis of the MSEP (AECOM 2011). To support that analysis, the Applicant for the MSEP reviewed and updated the input parameters for the numerical model, and modeled the drawdown associated with the different well locations associated with the MSEP. Again, the analysis concluded that groundwater use for the MSEP would result in drawdown of less than one foot at the nearest water supply wells, the radius of influence would not extend off of the Palo Verde Mesa, and it was unlikely that the MSEP would influence the PVID drains. For the Modified BSPP EIS, BLM used the modeling results from the BSPP, but updated their conclusions, stating that hydraulic connectivity between the PVMGB and PVVGB does not exist.

For the DQSP, the Applicant adapted the MSEP groundwater model, and customized it based on four potential locations of groundwater production wells within the Project boundaries URS 2016d, provided in Appendix X). The model was constructed as a single-layer (two-dimensional) numerical groundwater flow model in MODFLOW2000 (Groundwater Modeling System [GMS] platform). The geographic scope of the model included the entire Palo Verde Valley, including the mesa and floodplain. The base of the model was established at the bottom of the younger and older Colorado River alluvium, as these are the productive aquifers in the valley. A variety of boundary conditions were employed to simulate inflow and outflow of water from the model following the basin water balance. The Colorado River formed the eastern boundary of the model and was simulated using depth profiles provided by the U.S. Bureau of Reclamation (USBR) along selected locations of the river reach through the Palo Verde Valley. The river bottom elevation was linearly interpolated from these data for all river cells along the eastern boundary of the model

domain. The model was calibrated to steady-state conditions and average measured water levels from wells on both the mesa and floodplain from 1980 to 2009.

Groundwater withdrawals would occur during construction. A model was completed in order to evaluate the combined effects of pumping associated with construction and operation. Four well locations within the footprint of the Proposed Action were evaluated in the model as the pumping locations, including a well in the northeastern portion of the Project area (BLM North Well), a well on the private land parcel (Private Parcel Well), a well in the east-central portion of the Project area (BLM Central Well), and a well in the southern portion of the Project area (BLM South Well). None of these wells are currently in operation or in a usable condition, and there are no existing authorizations for them. However, they were selected because they represent locations that could feasibly be used for future wells, as they apparently served as water supply wells in the past.

The currently proposed locations of production wells are shown in Figure 2-2 for the Proposed Action, and in Figures 2-9 and 2-10 for the Resource Avoidance and Reduced Project Alternatives, respectively. The Northern Well is approximately in the same location as the production well proposed under the Resource Avoidance and Reduced Project Alternatives. Under the Proposed Action, the proposed production well would be located approximately 1.5 miles west of the Northern Well, and would be located much further from the other potentially affected wells on the mesa.

The groundwater pumping simulations were modeled for both a 25-month and 48-month construction scenarios. The 25-month construction scenario assumes water usage of 700 AFY for a total of 1,400 AF. The 48-month construction scenario assumes water usage of 450 AFY for a total of 1,800 AF.

Results from both construction scenarios indicated that the model-predicted drawdown outside of the solar field boundary would be less than 0.1 foot at the end of construction. Drawdown would primarily be constrained to the mesa area during construction. Additionally, under the 450 AFY construction scenario, the model predicts that the extent of drawdown is less than predicted for the construction scenario with the higher pumping rate (700 AFY) and shorter 25-month duration. Drawdowns less than 0.1 feet are negligible when considering the thickness of the aquifer and typical well installation in the region. Under both construction scenarios, the impacts from water use are negligible to offsite water wells.

In general, the results from the analysis of all four wells suggest that there are no potential well locations within the Project area that would result in unacceptable impacts to offsite wells. The results from the analysis of all four wells are similar to each other, showing approximately the same radius of influence limited to within approximately one mile of the well. Of the four wells, the Northern Well, under the 700 AFY scenario, is the most conservative scenario analyzed in the model because the location is on the Project area boundary, and is closest to other wells on the mesa northeast of the Project area, as identified in the USGS National Water Information System (NWIS) database. This is the only scenario in which drawdown exceeding 0.1 feet would occur outside of the Project area, and would potentially encompass another well location. Any other location within the Project area, including the location in the Proposed Action, potential temporary wells along the southeastern or southwestern Project boundary, would be further removed from the potentially affected wells on the mesa. As discussed in Section 2.3.3.8, further study, including groundwater well pump testing, would be performed to establish the feasibility of obtaining the needed supplies from onsite wells, and the specific locations of onsite production wells. However,

the result of the modeling of the four hypothetical well locations indicates that no onsite well location would result in unacceptable offsite impacts.

To ensure that the actual groundwater drawdown does not exceed the predicted drawdown, Mitigation Measure WATER-4 requires that the Applicant develop and implement a Groundwater Monitoring and Mitigation Plan prior to construction.

Surface Water Supplies

As discussed in Section 2.3.3.8, an off-site water supply may be used to supplement, or in place of, water from groundwater wells. This may include a situation where a temporary water source is needed before a water supply well can be installed, or could occur throughout the duration of construction. The source of this water would be the PVID, which obtains water from the Colorado River through Priority 1 and Priority 3 rights pursuant to a 1933 Water Delivery contract with the United States (URS 2016a, provided in Appendix Y).

PVID's Priority 3 water rights are not based on volume, but on the ability to irrigate 16,000 acres on the Palo Verde Mesa. As of 2000, approximately 2,500 acres on the mesa were receiving irrigation water from PVID. The majority of the Project site is located within the PVID service boundaries, and PVID has confirmed that PVID may supply water to areas within these boundaries for beneficial uses, which would include the Project. PVID has provided a letter, included as Appendix C of the WSA, indicating that they are capable and willing to supply the water for Project needs, and that their water supply and other customers would not be negatively impacted.

Water Quality

Construction of the DQSP would require the use of heavy machinery for vegetation grubbing, grading, and installation of roads, pipelines, generation facilities, transmission facilities, administration buildings, the solar field, and other facilities as discussed previously. Construction of these facilities would involve the use of bulldozers, graders, semi-trucks, and various other heavy machinery, and would involve changes to on-site topography. These activities would potentially loosen existing surface soils and sediments, increasing the potential for erosion during storm events. Additionally, the use of construction equipment may involve the accidental release of fuel, oils, brake dust, lubricants, antifreeze, and other potentially hazardous substances at the construction site. These water quality pollutants could become entrained in surface water during storm events, and/or be infiltrated into groundwater and the underlying aquifer, resulting in the degradation of water quality. Existing water quality would not be affected by extraction of groundwater during construction.

The Applicant will implement site design and protective erosion and drainage control design measures during construction to prevent the degradation of water quality. The Project will conform to the California State Water Resource Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges (General Permit) for activities regarding runoff and erosion control, as well as applicable regional, county, and local requirements. This will include preparing a SWPPP and implementing appropriate storm water BMP as described in Section 4.20.2 and required by Mitigation Measure WATER-1. BMPs will consist of control measures such as swales and ditches, stabilized construction entrances, gravel-covered construction staging area, and silt fencing. The industrial SWPPP (if necessary) will include appropriate BMPs (such as secondary containment structures around mineral oil-filled

transformers). Implementation of a SWPPP, would reduce the potential water quality degradation of stormwater emanating from the DQSP site.

Flood Hazards

The Project site is located in a desert environment within a large alluvial fan system with several washes that periodically collect runoff water during infrequent rain events. No perennial water bodies are located on the Project site itself. No Federal Emergency Management Agency- (FEMA-) designated flood zones exist within the vicinity of the Project; the Project Site Area and vicinity are classified by FEMA as Zone D, indicating an area where there are possible but undetermined flood hazards (FIRM map 06065C Panel 06065C3200G). In areas designated Zone D, no analysis of flood hazards has been conducted (URS 2011).

The Project site is located in an arid environment and on relatively high ground northeast of the Mule Mountains, which drain into and through portions of the site. Based on a site drainage report, the potential for flooding on the site is considered moderate (URS 2011). Although some surface water collects within the Project area, the Applicant is exploring site preparation methods that will contain water draining onto the site, and fill the primary low areas, if necessary, to avoid flooding hazard in limited portions of the site area. The Project area also contains washes that periodically contain water during infrequent events, and an agricultural ditch surrounding an offsite jobo farm also periodically contains water.

In the event that a major storm event occurs during construction of the DQSP, unanticipated flooding could occur on site. Potential for damage to facilities due to on-site flooding would be exacerbated during the construction period. This is because a major flood event could occur at any time, including prior to the completion of the proposed stormwater management facilities on site. Therefore, unless construction practices and procedures are carefully managed, flooding during construction could result in damages to onsite facilities, interference with the construction process, and potential exposure of employees to flood conditions.

To minimize potential for construction period flooding to affect site facilities, the Project will conform to the SWRCB NPDES General Permit for Storm Water Discharges, as described in Section 4.20.2. Site design and implementation of protective erosion and drainage control design measures during construction will manage stormwater flow to mitigate downstream erosion and channelization. In addition, the Applicant would be required to implement Mitigation Measure WATER-3, which would ensure that proposed onsite buildings are protected from flooding, and that all onsite buildings and fill areas are placed outside of frequent flood flow areas.

Operation and Maintenance

Groundwater Supply and Recharge

The impact assessment for groundwater was performed based on the results of a numerical groundwater model (Palo Verde Groundwater Model) that was previously developed for the BSPP and MSEP, which are located adjacent to each other, north of the Project across Interstate 10. The model encompasses the entirety of the Palo Verde Valley inclusive of both the PVMGB and the PVVGB; these basins considered together are hereafter referred to as the PVGB. The Palo Verde Groundwater Model was modified to accommodate the location of the proposed Project and its water supply wells. Model runs and associated documentation were completed by URS (2016d), in order to predict:

1. The effects from DQSP-only pumping during construction and operation, on groundwater supply wells on the Palo Verde Mesa, and how pumping might affect PVGB storage;
2. The cumulative effects of all proposed projects in the Palo Verde Valley on water levels and groundwater basin storage (results from this portion of the evaluation are considered under the subsequent discussion of cumulative impacts); and
3. To what extent the DQSP could cause a change in flux of surface water in PVID drains into underlying groundwater in the floodplain.

The Palo Verde Groundwater Model was constructed as a single-layer (two dimensional) numerical groundwater flow model in MODFLOW2000, with a domain that encompassed the entire Palo Verde Valley, inclusive of the mesa and floodplain. The base of the model was established at the bottom of the younger and older Colorado River alluvium, since these are the productive aquifers in the valley. A variety of boundary conditions were employed to simulate inflow and outflow of water from the model following the basin water balance. The Colorado River formed the eastern boundary of the model and was simulated using depth profiles provided by the USBR along selected locations of the river reach through the Palo Verde Valley. The river bottom elevation was linearly interpolated from these data for all river cells along the eastern boundary of the model domain.

In calibrating the Palo Verde Valley model, the hydraulic conductivity distribution was initially homogeneous and additional hydraulic conductivity zones were added as necessary to match the observed water levels and changes in hydraulic gradient in the floodplain and on the mesa. The model was calibrated to steady-state conditions and average measured water levels from wells on both the mesa and floodplain from 1980 to 2009.

No additional calibration was conducted for the numerical modeling for this Project. Steady-state conditions of calibrating the model to actual observed conditions of groundwater levels was deemed not necessary as few available additional data points of water levels were available in publically available records in the USGS NWIS database, and those few available water levels were measured close to water levels already included in the existing groundwater model.

Additionally, as part of the water balance calibration, the model also used the average measured discharge data from the PVID drains as a measure of model calibration, matching the average discharge data since 1993 reported by the USBR (USBR 2009). The model met calibration targets following generally accepted practices, and generally provided an adequate representation by comparison to the average water levels over the calibration period and flow directions and mixing along the mesa and floodplain boundary. Additional details regarding model design can be found in the Proposed Groundwater Use – Numerical Groundwater Modeling Report (URS 2016d).

Four model simulations were conducted where each of the four wells located on the site were individually modeled at the required pumping rates for providing the necessary rates of groundwater extraction during construction and operation. Groundwater pumping simulations were modeled for both a 25-month and 48-month construction scenarios followed by 30 years of operation. The 25-month construction scenario assumes water usage of 700 AFY during construction for a total of 1,400 AF, and 38 AFY during the operation period of 30 years for a total of 1,140 AF. Total Project water usage of 2,540 AF would be pumped under the 25-month construction and 30 year operational scenario (32 years). Because the 30 year period of the ROW would include the construction, operations, and decommissioning phases, the assumption of a

longer extraction period in the model is a conservative analysis of the impacts associated with groundwater withdrawal.

The 48-month construction scenario assumes water usage of 450 AFY during construction for a total of 1,800 AF, and 38 AFY during the operational period of 30 years for a total of 1,140 AF. Total Project water usage of 2,940 AF would be pumped under the 48-month construction and 30 year operational scenario (34 years). Again, this is a conservative analysis, by analyzing a longer duration for groundwater extraction.

The model results show that, regardless of the well configuration or associated pumping rates, the influence from DQSP pumping would be minimal. The model predicted that drawdown outside of the solar plant boundary would be less than 0.1 foot, both at the end of construction and at the end of operational pumping. As would be anticipated, the construction pumping produced a larger drawdown at the pumping well and correspondingly larger radius of influence. In general, the predicted cones of depression were similar among the scenarios.

Drawdown would primarily be constrained to the mesa area during operation. Predicted drawdowns at the end of operation for the Central Well and South Well show 0.01 feet of drawdown extending slightly into the PVVGB under the 700 AFY and 450 AFY scenarios. Additionally, under the 450 AFY construction scenario, the model predicts that the extent of drawdown is less than predicted for the construction scenario with the higher pumping rate (700 AFY) and shorter 25-month duration. Drawdowns less than 0.1 feet are negligible when considering the thickness of the aquifer and typical well installation in the region. Under both construction scenarios, the impacts from water use to off-site water wells are negligible.

The cumulative change in flow through the PVID drains was evaluated for the two varying construction pumping rate scenarios. Both scenarios show that there is a very small change in the PVID drain mass balance between the non-pumping and pumping condition at the end of construction and end of operation. For the 700 AFY construction scenario, there was a total change of about 476 AF at the end of the combined construction and operational period of 32 years. The total change represents 0.0037 percent or the 12.8 million AF of the throughput in the PVID drains over 32 years. For the 450 AFY construction scenario, there was total change of about 520 AF at the end of the combined construction and operational period of 34 years. The total change represents 0.0039 percent of the 13.5 million AF of the throughput in the PVID drains over 34 years.

It is important to note that this small of a change would be unmeasurable, and thus the model prediction cannot be verified. Further, it is also important to note that it is likely that this prediction is a function of the overall simplicity and limitations of the two-dimensional groundwater model and steady-state calibration, rather than a reflection of likely processes, given the very low proposed pumping volume. The change is very small in relationship to the overall PVID drain throughput in the model, and as such should be considered within the error of the model to reliably predict the change in mass flux from the drains. To ensure that the actual groundwater drawdown does not exceed the predicted drawdown, Mitigation Measure WATER-4 requires that the Applicant develop and implement a Groundwater Monitoring and Mitigation Plan prior to construction.

Installation of new impervious surfaces can in some cases result in reductions in ground surface infiltration capacity, potentially causing reductions in net groundwater recharge. As discussed in greater detail below (see subsequent discussion of stormwater flows), the approximate percentage

of the Project site that will be covered with impervious surfaces (inverter foundations, etc.), will constitute a fraction of one percent of the total surface area of the Project site. Infiltration of stormwater would be prevented from occurring within these areas. The unmitigated post-Project sediment transport will be less than the pre-Project conditions due to soil compaction during construction. In general, the Project site experiences relatively shallow and slow flows, so the nominal increases in post-Project flow depths and velocities do not overcome the decreased erosion potential due to compaction. Compaction of soils during construction would reduce infiltration slightly; however, the sandy desert soils located on site have generally high infiltration capacity. Additionally, areas surrounding the DQSP site would not be affected, and would remain pervious. Therefore, the potential effects of the proposed impervious surfaces on site would be minimal in comparison to the overall infiltration capacity of the DQSP site and surrounding areas. Within the solar field, the proposed panels are not expected to interfere with stormwater infiltration: rainfall incident on the panels would fall to the ground, which would remain pervious, and be permitted to infiltrate.

The BLM recognizes disagreement among water resource professionals as to whether hydrologic connectivity exists between the Palo Verde Mesa Groundwater Basin (PVMGB), which underlies the Project site, and the Colorado River via the intervening Palo Verde Valley Groundwater Basin (PVVGB) (Godfrey et al. 2013). The PVMGB and PVVGB collectively are referred to as the Palo Verde Groundwater Basin (PVGB). The issue is whether or not Project-related groundwater use could induce flows from the Colorado River into the PVMGB. Any resulting use of Colorado River water without an entitlement could be considered to violate the Law of the River (Colorado River Compact of 1922 and amendments).

After thorough review and consideration of input received during the formal comment period on the MSEP Draft EIS, BLM concluded that the data does not demonstrate that connectivity exists. Agricultural development in the area has caused changes in the groundwater flow patterns in local aquifers (USGS 1988). Irrigation and its associated network of drainage ditches have a significant effect on the saturated thickness of the aquifers and on the direction of groundwater movement through the aquifers (USGS 1988). In the vicinity of the Project site, a boundary between the PVMGB and the PVVGB exists along the toe of the mesa in the form of Palo Verde Valley Irrigation District (PVID) drains. Water from the Colorado River, located over 6 miles east of the mesa, does not flow into the PVMGB due to PVID's drains that intercept all river water (in the form of sub-surface flow within the PVVGB) flowing west toward the PVMGB. Similarly, in the vicinity of the Project, groundwater within the PVMGB either flows east into a PVID drain along the toe of the mesa or into a cone of depression formed by a well. PVID drains prevent underflow from the PVVGB into the PVMGB from occurring and no water flows directly from the Colorado River past the network of PVID drains into the PVMGB. However, the fact that connectivity has not yet been demonstrated does not preclude the possibility that connectivity could be shown in the future.

Separate from the groundwater model, BLM reviewed the Colorado River Accounting Surface methodology proposed by the USGS (USGS 2009). A review of the Figure 6 in the USGS analysis shows that the Accounting Surface elevation in the vicinity of the Project is approximately 237 feet above sea level. From Figure 5 in the Groundwater Modeling Report (URS 2016d), the groundwater elevation in the Project area is approximately 245 to 250 feet above sea level. Based on the maximum modeled drawdown of approximately one foot, it is unlikely that the Project would withdraw groundwater from below the Accounting Surface. Mitigation Measure WATER-

4 provides details related to the required analysis, including development of specific groundwater elevation triggers, and specific actions to be taken if trigger elevations are reached, to reduce the possibility of impacts related to Colorado River water.

Surface Water and Drainage Patterns

The DQSP would be constructed in an area that presently is drained primarily by sheet flow and desert washes. Low-frequency, high-intensity monsoonal storms in the region can result in high volumes of stormwater flow within the vicinity of the DQSP site, which can cause high volumes of surface runoff to occur in the vicinity of the Project area. Although on-site grading would be minimized, and major features of existing onsite drainages would be preserved, the installation of proposed facilities, including roads, fencing, and solar arrays, could interfere with existing drainage patterns onsite. These changes could result in altered hydrology on site or downstream, thereby causing increases in erosion and sedimentation.

In general, surface water drains onto the Project site from the surrounding mountains to the north and west, then towards the Colorado River to the east. There are no perennial streams on the Project site or the Palo Verde Mesa. The Project area consists of two distinct types of topography which affect site drainage. Approximately half of the northwestern portion of the Project site is part of an alluvial fan which slopes in a southeastward direction from the McCoy Mountains, located to the northwest. The southeastern portion of the site is a flat plateau, part of the Palo Verde Mesa. The ground surface in this area is characterized by a series of depressions in which surface water can pool.

The Project would cause minor impacts to the existing drainage shed area. During construction, the Project would alter the soil's hydraulic characteristics within the solar arrays due to vegetation removal and grading. Vegetation would be disked under, mulched or composted and retained onsite to assist in erosion control and limit waste disposal. Grading activities would consist of grading within sections of the solar array fields; however, the macro-level topography would remain unchanged.

A drainage study conducted for the Project shows that impacts to onsite drainage systems will be minimized due to the relatively flat terrain and presence of large natural depressions that range from one to five feet deep (TLA 2011). These large depressions store significant volumes of water which would attenuate the increased runoff. After construction, increases in flow depth, velocity and outflow would be mitigated with onsite retention basins sized with at least 20 AF of combined storm water storage capacity. In addition, sediment transport would be less than the pre-Project conditions due to soil compaction during construction.

The unmitigated post-Project impacts during the 100-year storm event are as follows:

- Average Flow Depth increase of 0.03-feet
- Average Flow Velocity increase of 0.04 feet/second
- Total Outflow increase of 20 AF (2.6%)

The maximum potential pier scouring at the solar array pedestal supports is 1.22 feet. The structural design and embedment depth of the solar panel pedestal piers shall account for the maximum potential scour plus a factor of safety. Monitoring after large storm events shall be implemented to detect piers with significant scouring.

Flood Hazards

No FEMA-designated flood zones exist within the vicinity of the Project. The Project site area and vicinity are classified by FEMA as Zone D, indicating an area where there are possible but undetermined flood hazards (FIRM map 06065C Panel 06065C3200G). In areas designated Zone D, no analysis of flood hazards has been conducted (URS 2011). Based on the site drainage report, the potential for flooding on the Project site is considered moderate (URS 2011). Although some surface water collects within the Project area, the Applicant is exploring site preparation methods that will contain water draining onto the site, and would fill the primary low areas, if necessary, to avoid flooding hazards in limited portions of the site area. The Project area also contains washes that periodically contain water during infrequent events, and an agricultural ditch surrounding an offsite jojoba farm also periodically contains water.

In the event that a major storm event occurs during operation of the DQSP, unanticipated flooding could occur onsite. Construction of the Project would involve the disturbance of soil that would slightly alter existing drainage patterns as well as its flow rate and volume. The Project would be designed such that existing drainage patterns would be preserved to the maximum extent practicable. Impacts to onsite drainage systems would be minimized due to the relatively flat terrain and presence of large natural depressions that range from one to five feet deep (TLA 2011). These large depressions fill with water and store significant volumes of water which would attenuate the increased runoff. Although these depressions would result in “flooding” onsite, these are naturally existing conditions that would not be substantially altered as the result of the Project.

In addition, the Applicant would be required to implement Mitigation Measure WATER-3, which would ensure that proposed onsite buildings are protected from flooding, and that all onsite buildings and fill areas are placed outside of frequent flood flow areas.

Water Quality

During operation, the transportation, storage, and use of hazardous materials at the Project could potentially impact water quality at the site. The use of vehicles may involve the accidental release of fuel, oils, brake dust, lubricants, antifreeze, and other potentially hazardous substances at the construction site. These water quality pollutants could become entrained in surface water during storm events, and/or be infiltrated into groundwater and the underlying aquifer, resulting in the degradation of water quality. The Applicant proposes to use engineering and administrative controls as part of the Proposed Action and Alternatives. Engineering controls are the physical or mechanical systems that can prevent the spill of hazardous material from occurring, or that can either limit the amount of a spill or to a confined area. Administrative controls are the rules and procedures that workers at the facility must follow that would help to prevent accidents or to minimize releases if they do occur. These procedures typically are established in worker safety training and emergency response plans. Implementation of both engineering and administrative controls can act as methods of prevention or as methods of response and minimization. Potential spills of hazardous materials would be managed through hazardous materials management measures (see Section 4.9, *Hazards and Hazardous Materials*).

In addition, operation and maintenance of the Project would not result in the discharge of effluent, with the exception of stormwater. The unmitigated post-Project sediment transport will be less than the pre-Project conditions due to soil compaction during construction. In general, the Project site experiences relatively shallow and slow flows, so the nominal increases in post-Project flow

depths and velocities do not overcome the decreased erosion potential due to compaction. As such, sediment transport would not increase as a result of the Project. Existing water quality would not be affected by extraction of groundwater during construction.

Springs

According to the NWIS database of Water Resources of the United States that is maintained by the USGS (2013), no springs or other surface water sites are located in the Project boundary or in the area of the larger Palo Verde Mesa Groundwater Basin.

Decommissioning

Groundwater Supply and Recharge

Decommissioning would take approximately one year, and would require approximately the same water use for dust suppression as the construction phase, resulting in additional groundwater pumping of up to 450 to 700 AFY during decommissioning. As described for Project construction, which would use a greater overall volume of groundwater and the same or greater annual pumping rate, model results indicated that drawdown outside of the solar field boundary, as well as potential effects of withdrawals on PVID facilities, would be minimal. Therefore, because decommissioning would result in reduced withdrawals as compared to construction, it would not have an adverse effect on groundwater supply or recharge.

Additionally, operational period pumping would be minimal. Therefore, ceasing of operational period pumping due to decommissioning would be expected to result in a minimal to negligible increase in remaining groundwater supplies within the basin.

To ensure that the actual groundwater drawdown does not exceed the predicted drawdown, Mitigation Measure WATER-4 requires that the Applicant develop and implement a Groundwater Monitoring and Mitigation Plan prior to construction.

Surface Water and Drainage Patterns

Decommissioning of the DQSP would result in a minor reduction in on-site impervious structures, because on-site facilities would be removed. Removal of such facilities would not substantially affect on-site or downstream hydrology, due to the limited extent of such facilities. Similar to DQSP construction, decommissioning could result in alteration of on-site topography, and therefore of on-site drainage patterns. These changes could result in altered erosion and sedimentation patterns, which could affect downstream areas on site or off site. Implementation of Mitigation Measures WATER-1, WATER-2, and WATER-3 would include development and adherence to the recommendations of a Decommissioning Drainage, Stormwater, and Sedimentation Control Plan, would reduce potential impacts from erosion and sedimentation.

Flood Hazards

Decommissioning would remove structures and people from areas that may be subject to flood-related hazards. Effects during decommissioning would be similar to construction. After decommissioning is completed, no further effects would occur.

Water Quality

Decommissioning impacts generally would be similar to those indicated for construction, with respect to potential for release of construction related water quality pollutants. Adherence to Colorado River RWQCB policies and ensure that water quality impacts associated with removal of that facility would be minimized.

4.20.3.2 Alternative 2: Resource Avoidance Alternative

Alternative 2 is located within the same footprint of Alternative 1, but the total ground disturbance would be 2,833 acres instead of 3,831 acres. Approximately 75 percent of the total Project area would be covered or shaded by solar modules under Alternative 2, versus approximately 75 percent coverage under Alternative 1. Water use scenarios for construction and operation would be the same for Alternative 2 as they are for Alternative 1. Construction techniques, general design, and operation of Alternative 2 would be the same as for Alternative 1. As such, the hydrology and water quality impacts for Alternative 2 are the same or less as the results of the analysis of hydrology and water quality impacts presented for the Alternative 1.

4.20.3.3 Alternative 3: Reduced Project Alternative

Alternative 3 is located within the same footprint of Alternative 1, but the total ground disturbance would be 2,099 acres instead of 3,831 acres. Approximately 75 percent of the total Project area would be covered or shaded by solar modules under Alternative 3, versus approximately 75 percent coverage under Alternative 1. Water use scenarios for construction and operation would be the same for Alternative 3 as they are for Alternative 1. Construction techniques, general design, and operation of Alternative 3 would be the same as for Alternative 1. As such, the hydrology and water quality impacts for Alternative 3 are the same or less as the results of the analysis of hydrology and water quality impacts presented for the Alternative 1.

4.20.4 Application of CEQA Significance Thresholds

HYD-1) Would the Project violate any water quality standards or waste discharge regulations?

Construction of Alternatives 1, 2, or 3 could result in a temporary degradation of water quality. The Project area of Alternatives 2 and 3 would be smaller than that for Alternative 1. Sediment would be the constituent of greatest concern during construction, resulting from potential erosion during excavation, grading, compaction, trenching, and other construction activities. These activities would involve the disturbance of soil which could introduce contaminants to stormwater runoff and affect water quality in surface water and groundwater. Other pollutants that could affect surface and groundwater quality during Project construction include petroleum products (e.g., gasoline, diesel, kerosene, and grease) from operating heavy machinery and equipment, paints and solvents, lubricants, detergents, fertilizers, and pesticides. Existing water quality would not be affected by extraction of groundwater during construction.

Any sanitary waste produced during construction (e.g., from portable toilets) would be disposed of according to applicable laws, rules, and regulations. In addition, implementation of worker environmental awareness training would provide construction personnel with instruction on their individual regulatory compliance responsibilities. With respect to water quality, the training would

include worker responsibilities under the CWA, the SWPPP(s), site-specific BMPs, and about the location of Safety Data Sheets. The training also would provide instructions to notify the foreman and regional spill response coordinator in case of a hazardous materials spill or leak. Instruction also would be provided on the importance of maintaining the construction site in regards to trash disposal.

Alternatives 1, 2, or 3 would implement Mitigation Measure WATER-1 (Implementation of SWPPP) and WATER-2 (Comprehensive Drainage, Stormwater, and Sedimentation Control Plan) during construction. This includes implementing appropriate stormwater BMPs, as required in WATER-1. Implementation of the mitigation measures would reduce the potential water quality degradation of stormwater emanating from the DQSP site. With implementation of Mitigation Measures WATER-1 and WATER-2, potential impacts to water quality would be minimized during construction. Therefore, construction impacts related to the violation of water quality standards or waste discharge requirements would be less than significant for Alternatives 1, 2, or 3.

During the operation of Alternatives 1, 2, or 3, no water quality standards or waste discharge requirements are anticipated to be violated as routine activities would be conducted per all applicable standards. Very little vehicular traffic will occur at the site, so the potential for runoff contaminated by vehicle pollutants would be low.

Transportation, storage, and use of hazardous materials at the Project could potentially impact water quality at the site. The use of vehicles may involve the accidental release of fuel, oils, brake dust, lubricants, antifreeze, and other potentially hazardous substances at the construction site. These water quality pollutants could become entrained in surface water during storm events, and/or be infiltrated into groundwater and the underlying aquifer, resulting in the degradation of water quality. The Applicant would implement engineering and administrative controls as methods of prevention or as methods of response and minimization. Potential spills of hazardous materials would be managed through hazardous materials management measures (see Section 4.9, *Hazards and Hazardous Materials*).

A septic system and leach field would be located at the O&M building, and would serve the Project's sanitary wastewater treatment needs. Because of the small operational work force for Alternatives 1, 2, or 3, volumes of sanitary waste discharged to the septic system and leach field will be no more than a few hundred gallons per day during operation. Permits for the septic system will be obtained from Riverside County, as needed. Soil percolation tests would be performed in order to demonstrate that an on-site septic system and leach field is feasible at the planned location.

Ongoing O&M of Alternatives 1, 2, or 3 would result in the discharge stormwater. The Project area of Alternatives 2 and 3 would be smaller than that for Alternative 1. The unmitigated post-Project sediment transport will be less than the pre-Project conditions due to soil compaction during construction. In general, the Project site experiences relatively shallow and slow flows, so the nominal increases in post-Project flow depths and velocities do not overcome the decreased erosion potential due to compaction. Mitigation Measure WATER 2 will be implemented to ensure that the retention basins and other design features retain stormwater onsite. As a result, O&M of Alternatives 1, 2, or 3 would not violate any water quality standards or waste discharge requirements. The impact from O&M of Alternatives 1, 2, or 3 would be less than significant.

HYD-2) Would the Project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction and operation of the O&M buildings, On-Site Substation, and equipment pads would create new areas of impermeable surfaces that could potentially interfere with groundwater recharge; however, the new impermeable surfaces would be minimal in comparison to the total solar facility area which would be left in a pervious condition and would not significantly interfere with groundwater recharge.

Water supplies required for construction, operation, and maintenance of Alternatives 1, 2, or 3 would be provided by onsite groundwater wells. An analysis of impacts to groundwater supply and recharge was conducted based on modeling of the anticipated effect of Project-related groundwater withdrawal on the overall groundwater balance in the PVGB. The modeling also assessed potential impacts from the effect of groundwater withdrawal on the PVID drains, and the effect of the withdrawal on nearby groundwater wells.

Four existing well locations within the footprint of the Project were evaluated in the model as the pumping locations. Groundwater pumping simulations were modeled for both a 25-month and 48-month construction scenarios with 30 years of operation. The 25-month construction scenario assumes water usage of 700 AFY during the construction period for a total of 1,400 AF, and water usage of 38 AFY for the operational period of 30 years for a total of 1,140 AF. Total Project water usage of 2,540 AF would be pumped under the 25-month construction and 30 year operational scenario (32 years).

The 48-month construction scenario assumes water usage of 450 AFY during the construction period for a total of 1,800 AF, and water usage of 38 AFY for the operational period of 30 years for a total of 1,140 AF. Total Project water usage of 2,940 AF would be pumped under the 48-month construction and 30 year operational scenario (34 years).

Results from both scenarios indicated that the model-predicted drawdown outside of the solar field boundary would be less than 0.1 foot at the end of construction and at the end of operational pumping. Drawdown would primarily be constrained to the mesa area during construction and operation. Additionally, under the 450 AFY construction scenario, the model predicts that the extent of drawdown is less than predicted for the construction scenario with the higher pumping rate (700 AFY) and shorter 25-month duration. Under both construction scenarios, the impacts from water use are negligible to offsite water wells.

The cumulative change in flow through the PVID drains was evaluated for the two varying construction pumping rate scenarios and both scenarios show that there is a very small change in the PVID drain mass balance between the non-pumping and pumping condition at the end of construction and end of operation. For the 700 AFY construction scenario, there was a total change of about 476 AF at the end of the combined construction and operational period of 32 years. The total change represents 0.0037 percent of the 12.8 million AF of the throughput in the PVID drains over 32 years. For the 450 AFY construction scenario, there was total change of about 520 AF at the end of the combined construction and operational period of 34 years. The total change represents 0.0039 percent of the 13.5 million AF of the modeled throughput in the PVID drains over 34 years.

To ensure that groundwater levels are not impacted by the Project, Mitigation Measure WATER-4 (Groundwater Monitoring and Mitigation Plan) and WATER-5 (Mitigation of Impacts to the Palo Verde Mesa Groundwater Basin) would be implemented. Based on the groundwater modeling conducted for the Project and with the implementation of WATER-4 and WATER-5, impacts to groundwater supplies, groundwater recharge and groundwater levels during construction and operation would be less than significant for Alternatives 1, 2, or 3.

HYD-3) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Alternative 1 would cause minor impacts to the existing drainage shed area. During construction, the Project would alter the soil's hydraulic characteristics within the solar arrays due to vegetation removal and grading. Vegetation would be disked under, mulched or composted and retained onsite to assist in erosion control and limit waste disposal. Grading activities would consist of grading within sections of the solar array fields; however, the macro-level topography would remain unchanged.

A drainage study conducted for the Project shows that impacts to on-site drainage systems would be minimized due to the relatively flat terrain and presence of large natural depressions that range from one to five feet deep (TLA 2011). These large depressions store significant volumes of water which would attenuate the increased runoff. After construction, increases in flow depth, velocity and outflow would be mitigated with onsite retention basins sized with at least 20 AF of combined storm water storage capacity. In addition, sediment transport would be less than the pre-Project conditions due to soil compaction during construction.

The Project would implement Mitigation Measures WATER-1 (Implementation of SWPPP) and WATER-2 (Comprehensive Drainage, Stormwater, and Sedimentation Control Plan) during construction. This includes implementing appropriate stormwater BMPs, as noted in WATER-1. Implementation of the mitigation measures would reduce the potential water quality degradation of stormwater emanating from the DQSP site.

With implementation Mitigation Measures WATER-1 and WATER-2, impacts related to erosion or siltation as a result of an altered drainage patterns would be less than significant under Alternatives 1, 2, or 3.

HYD-4) Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

As described in HYD-3, construction activities associated with Alternatives 1, 2, or 3 would involve the disturbance of soil that would slightly alter existing drainage patterns as well as its flow rate and volume. The Project would be designed such that existing drainage patterns would be preserved to the maximum extent practicable. Impacts to onsite drainage systems would be minimized due to the relatively flat terrain and presence of large natural depressions that range from one to five feet deep (TLA 2011). These large depressions fill with water and store significant volumes of water which would attenuate the increased runoff. Although these depressions would

result in “flooding” onsite, these are naturally existing conditions that would not be substantially altered as the result of the Project.

With implementation of Mitigation Measures WATER-1, WATER-2, and WATER-3, construction impacts from Alternatives 1, 2, or 3 related to flooding onsite or offsite due to a change in drainage patterns or an increase in the rate or amount of surface runoff would be less than significant.

The structural components of the Project (solar panels) would not significantly alter the existing drainage patterns, including the rate and amount of surface flow. In addition, creation of impermeable surfaces relative to the Project area would be nominal allowing for infiltration of stormwater at rates close to existing conditions. Overall, the Project would result in slight alterations in the existing drainage pattern of the site or surrounding area (refer to discussion in HYD-3). However, the nominal post-Project increases in flow depth, velocity and outflow would be mitigated with onsite retention basins sized with at least 20 AF of combined storm water storage capacity. With implementation of Mitigation Measures WATER-1, WATER-2, and WATER-3, operational impacts from Alternatives, 2, or 3 related to flooding onsite or offsite due to a change in drainage patterns or an increase in the rate or amount of surface runoff would be less than significant.

HYD-5) Would the Project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Creation of new access roads (both gravel and compacted earth/native soil) and construction of the On-Site Substation, and O&M facility, along with grading for installation of the solar array, would create additional sources of runoff. During earthwork activities, surface water control would be managed through the implementation of Mitigation Measures WATER-1 and WATER-2. With implementation of Mitigation Measures WATER-1 and WATER-2, Alternatives 1, 2, or 3 would not provide substantial increases in the amount of runoff or additional sources of polluted runoff, and construction impacts related to an exceedance of the capacity of existing drainage systems or a substantially greater contribution of polluted runoff would be less than significant.

During operation, nominal increases in flow depth, velocity and outflow are anticipated and would be mitigated with onsite retention basins sized with at least 20 AF of combined storm water storage capacity. Once the Project is in operation, the Project site conditions would be similar to the existing conditions and additional sources of polluted runoff would be insignificant. With implementation of Mitigation Measure WATER-2, Alternative 1, 2, or 3 operation impacts related to an exceedance of the capacity of existing or planned stormwater drainage systems or a substantially greater contribution of polluted runoff would be less than significant.

HYD-6) Would the Project otherwise substantially degrade water quality?

Ground disturbance related to construction of Alternatives 1, 2, or 3 could potentially degrade water quality through the inadvertent release of hazardous materials. The effects of the Project on water quality are discussed in detail under HYD-1. Please refer to this section for explanations of the impact determination during construction and operation.

To ensure that groundwater levels and quality are not impacted by the Project, Mitigation Measure WATER-4 (Groundwater Monitoring and Mitigation Plan) would be implemented. With implementation of Mitigation Measure WATER-4, impacts related to substantially degrading water quality would be less than significant for Alternatives 1, 2, or 3.

HYD-7) Would the Project place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Alternatives 1, 2, or 3 would not include the placement of housing within a 100-year flood hazard area as mapped on the FEMA Flood Insurance Rate Map. In addition, Mitigation Measure WATER-3 would be implemented to reduce impacts from flooding. Therefore, no impacts would occur from placing housing within a 100-year flood hazard area under Alternatives 1, 2, or 3.

HYD-8) Would the Project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The Project site is classified by FEMA as Zone D, indicating that there are possible but undetermined flood hazards (FIRM map 06065C Panel 06065C3200G). A drainage study conducted for the Project shows presence of large natural depressions that range from one to five feet deep (TLA 2011). These large depressions store significant volumes of water which would attenuate the increased runoff. After construction, increases in flow depth, velocity and outflow would be mitigated with on-site retention basins sized with at least 20 AF of combined storm water storage capacity. In addition, sediment transport would be less than the pre-Project conditions due to soil compaction during construction. In addition, Mitigation Measure WATER-3 would be implemented to reduce impacts to structures from flooding. During construction and operation, structures would not be placed within any known 100-year flood hazard area. Therefore, there would be no impacts under Alternatives 1, 2, or 3 related to the placement of structures within a 100-year flood hazard area which would impede or redirect flows.

HYD-9) Would the Project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Alternatives 1, 2, or 3 would not be located in the vicinity of a levee or dam. Portions of the Project would be located in areas with large depressions that are capable of storing significant volumes of water; however, structures would not be located in these areas. In addition, Mitigation Measure WATER-3 would be implemented to reduce impacts to the Project from flooding. As such, the Project would not expose people or structures to significant risk of loss, injury, or death involving flooding. Impacts related to flooding, including as the result of the failure of a levee or dam would be less than significant.

HYD-10) Would the Project be at risk of inundation by seiche, tsunami, or mudflow?

Alternatives 1, 2, or 3 are not located near a body of water such as a lake or ocean; therefore, there would be no impacts to the Project from a seiche or tsunami.

Mudflows are flows of water that contain large amounts of silt, sand, boulders, organic material, and other debris. Mudflows occur on steep slopes where vegetation is not sufficient to prevent

rapid erosion but can occur on gentle slopes if other conditions are met such as large, sudden rainfall events. The Project site and immediate surrounding area is relatively flat and is in an area that is characterized by dry climatic conditions. Annual rainfall in the Project area is approximately 3.5 inches per year, although high intensity storm events may occur. High intensity storms could generate significant runoff from steep mountains in the surrounding Project area. These mountains are composed of metamorphic and granitic rocks and are less prone to mudflows. As such, there would be no impact to the Project from mudflows.

HYD-11) Would the Project include new or retrofitted Stormwater Treatment Control BMPs (e.g., water quality treatment basins, constructed treatment wetlands), the operation of which could result in significant environmental effects (i.e., increased vectors and/or odors)?

Alternatives 1, 2, or 3 would include onsite retention basins located at the upstream and/or downstream edges of the Project. Retention basins would be sized with at least 20 AF of combined stormwater storage capacity. These retention basins would contain water only after large storm events and shortly thereafter. Annual rainfall in the Project area is approximately 3.5 inches per year, therefore; construction and operation of these stormwater features are not expected to result in significant environmental effects. The impacts would be less than significant.

HYD-12) Would the Project cause changes in absorption rates or the rate and amount of surface runoff?

See HYD-3 and HYD-4 above. The Project would cause slight changes in the absorption rates and amount of surface water to onsite or offsite drainages due to compaction. However, the nominal post-Project increases in flow depth, velocity and outflow would be mitigated with on-site retention basins sized with at least 20 AF of combined storm water storage capacity.

The Project will implement Mitigation Measures WATER-1 and WATER-2. Appropriate stormwater BMPs are included in these mitigation measures. Implementation of the mitigation measures would help manage surface runoff. With implementation of WATER-1 and WATER-2, potential alteration to drainages would be minimized during construction and operation, and impacts to runoff and absorption rates from Alternatives 1, 2, or 3 would be less than significant.

HYD-13) Would the Project cause changes in the amount of surface water in any water body?

See HYD-2 above. If groundwater is used as the water supply, the Project would reduce the amount of water flows to the PVID drains. For the 700 AFY construction scenario, there was a total change to the PVID drains of about 476 AF at the end of the combined construction and operational period of 32 years. The total change represents 0.0037 percent of the 12.8 million AF of the throughput in the PVID drains over 32 years. For the 450 AFY construction scenario, there was total change of about 520 AF at the end of the combined construction and operational period of 34 years. The total change represents 0.0039 percent of the 13.5 million AF of the throughput in the PVID drains over 34 years. These changes in flow through are so small that they could not be reliably measured in the PVID drains, and would not have an adverse effect on Colorado River water supplies or diversions. If surface water from PVID is used, PVID has confirmed that the Project would not adversely affect their water supplies or other customers. Based on the groundwater modeling

conducted, the small changes to surface water (PVID drains and Colorado River), would be less than significant under Alternatives 1, 2, or 3..

4.20.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.20 would be maintained. There would be no water use, and no modification of site hydrology. Therefore Alternative 4 would not result in any water resources impacts.

4.20.6 Cumulative Impacts

The geographic scope of the cumulative impacts analysis with respect to water resources includes those areas overlying the PVGB for groundwater-related impacts, and the watershed for water quality and drainage-related impacts. The temporal scope for potential cumulative impacts includes the construction, operation, and maintenance periods of the Project.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

Groundwater

An assessment was conducted to evaluate the collective water supply requirements by multiple proposed renewable and other energy projects within the geographic area of the Palo Verde Mesa/Valley. The cumulative project list was prepared as part of the groundwater modeling report conducted for the Project and in coordination with the BLM (URS 2016d). In addition to the proposed DQSP, six other energy projects were identified on the mesa. Project schedules, operational and construction water supply requirements, and the source of the water supply were evaluated for each project identified. Tables 2A and 2B of the groundwater model for the Project (URS 2016d) provide a summary of the individual water use for each project and provide an assessment of total yearly and cumulative use for the 25-month and 48-month construction scenarios and the operational period of 30 years.

For the 700 AFY construction pumping scenario, the cumulative energy projects combined annual construction and operational water requirements range from an estimated 1,831 AFY to 4,831 AFY at the end of the 25-month construction period. During the first year of construction, the Project represents about 38 percent of the total combined annual water usage from energy projects in the PVGB, and approximately 14 percent during the second year of construction. Cumulative total water use from these energy projects, through 2018, is estimated to be approximately 7,603 AF. This represents approximately 0.11 percent of the estimated 6.84 million AF of groundwater storage capacity of the PVGB.

Under the 450 AF construction scenario the cumulative energy projects combined annual operational water requirements range from an estimated 1,581 up to 4,581 AFY during the 48-month construction period. During the first year of construction, the Project represents about 28

percent of the total combined annual water usage from energy projects in the PVGB, and approximately 13 percent during the fourth year of construction. Cumulative total water use from these energy projects, through 2020, is estimated to be approximately 15,167 AF. This represents approximately 0.22 percent of the estimated 6.84 million AF of groundwater storage capacity of the PVGB.

Given the saturated thickness of the alluvial deposits of several hundred feet in the area, the estimated 6.84 million AF of groundwater storage capacity of the PVGB, and the small cumulative change in flow through the PVID drains, the Project would not contribute to cumulative impacts to groundwater levels and recharge during construction and operation (impact HYD-2). In addition, pumping of groundwater for the Project on the mesa would not impact the quality of the groundwater during construction and operation. During decommissioning, the cumulative impacts to groundwater would be similar to those during construction because groundwater would be used for decommissioning activities.

Surface Water Supplies

As discussed in Section 2.3.3.8, an off-site water supply may be used to supplement, or in place of, water from groundwater wells. The source of this water would be the PVID, which obtains water from the Colorado River through Priority 1 and Priority 3 rights pursuant to a 1933 Water Delivery contract with the United States (URS 2016a, provided in Appendix Y).

The majority of the Project site is located within the PVID service boundaries, and PVID has confirmed that PVID may supply water to areas within these boundaries for beneficial uses, which would include the Project. PVID has provided a letter, included as Appendix C of the WSA, indicating that they are capable and willing to supply the water for Project needs, and that their water supply and other customers would not be negatively impacted.

Other solar energy Projects in the area, including BMSP and the Palo Verde Mesa Solar Project, use surface water supplied by PVID. BMSP will use 451 AFY during its three year construction period, and a negligible amount during operations. Palo Verde Solar will use 500 AFY during its three year construction period, and 302 AFY during operations. Both sites occupy former agricultural lands, so the amount of water used for solar project construction and operations is much lower than was used for irrigation when those properties were used for agriculture.

Surface Water Hydrology

Cumulative surface water hydrology impacts can occur if the effects of individual projects, including modification of the amount of surface water or sedimentation downgradient from a project site, would overlap with the effects of another project. As discussed in the analysis of impacts HYD-3 through HYD-5, HYD-11, and HYD-12 in Section 4.20.4, a drainage study conducted for the Project shows that impacts to on-site drainage systems would be minimized due to the relatively flat terrain and presence of large natural depressions that range from one to five feet deep (TLA 2011). These large depressions store significant volumes of water which would attenuate the increased runoff. After construction, increases in flow depth, velocity and outflow would be mitigated with onsite retention basins sized with at least 20 AF of combined storm water storage capacity. Because of these features, surface water flow onto the Project site from upgradient is attenuated. In addition, onsite stormwater flow would be managed under several regulatory programs and mitigation measures, including Mitigation Measures WATER-1 (Implementation of SWPPP) and WATER-2 (Comprehensive Drainage, Stormwater, and

Sedimentation Control Plan). Similar BMPs and regulations are required of any projects located upgradient of the Project site. Because flow from upgradient projects is mitigated by BMPs and regulatory controls, flow onto the Project site from upgradient is attenuated in onsite features, and flow off of the Project site is mitigated by BMPs and regulatory controls, the contribution of the Project to cumulative surface water hydrology impacts is not cumulatively considerable.

The cumulative change in flow through the PVID drains was evaluated for the two varying construction pumping rate scenarios and both scenarios show that there is a very small change in the PVID drain mass balance between the non-pumping and pumping condition at the end of construction. For the 700 AFY construction scenario, there was a total change of about 0.36 AF at the end of construction. The total change represents 0.000031 percent of the 1.2 million AF of the throughput in the PVID drains over 25 months. For the 450 AFY construction scenario, there was total change of about 7.87 AF at the end of construction. The total change represents 0.00037 percent of the 2.3 million AF of the throughput in the PVID drains over 48 months.

These small changes in flow through could not be reliably measured in the PVID drains and thus the model prediction cannot be verified. As noted, the change is very small in relationship to the overall PVID drain throughput in the model, and as such should be considered within the error of the model to reliably predict the change in mass flux from the drains. Therefore the contribution of the Project to the amount of surface water (impact HYD-13) would not be cumulatively considerable.

The Project would not result in housing or structures in a 100-year flood zone (impacts HYD-7 and HYD-8), and would not be subject to hazards associated with levees or dams (impact HYD-9) or seiche, tsunami, or mudflow (impact HYD-10).

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The cumulative impacts for Alternative 2 would be similar to those of Alternative 1 because even with the reduced ground disturbance footprint, groundwater use would be the same during construction, operation, and decommissioning as for Alternative 1. For Alternative 2, it is assumed that water use for other projects on the mesa would remain the same during the construction and operation as for of Alternative 1. In addition, the construction and operational periods would be the same for Alternative 2 as they are for Alternative 1, therefore, cumulative impacts for Alternative 2 are less than significant.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The cumulative impacts for Alternative 3 would be similar to those of Alternative 1 because even with the reduced ground disturbance footprint and reduced output, groundwater use would be the same during construction, operation, and decommissioning as for Alternative 1. For Alternative 3, it is assumed that water use for other projects on the mesa would remain the same during the construction and operation as for of Alternative 1. In addition, the construction and operational periods would be the same for Alternative 3 as they are for Alternative 1, therefore, cumulative impacts for Alternative 3 are less than significant.

4.20.7 Residual Impacts

Even with mitigation measures, the Project would result in minor adverse impacts to water resources. These would include a minor reduction in groundwater levels, and minor changes to stormwater flow characteristics. Although evidence indicates that project wells would not induce flow from the Colorado River, some uncertainty remains. Implementation of the mitigation measures identified above (i.e., WATER-4) would avoid or offset potential impacts, if any, related to Colorado River water. Consequently, no residual impact would occur. Following decommissioning, groundwater use would cease, and site topography would be restored. Therefore, both impacts would cease to occur following decommissioning of the Project. If releases of hazardous materials were to occur and result in groundwater contamination that could not be remediated before the completion of decommissioning, it is possible that residual groundwater contamination would remain after surface-based decommissioning activities are completed. As specified in Mitigation Measure WATER-1, decommissioning would not be considered complete until BLM approved completion of any groundwater remediation activities required of the Applicant.

4.21 Wildland Fire

4.21.1 Methodology for Analysis

This analysis of impacts of the Project on wildland fire ecology assesses the size, location, and environmental setting of the Project; the number and type of vehicles that would access the site for construction, operation, maintenance, and decommissioning activities; and potential fire hazards resulting from operation of the electrical infrastructure.

4.21.1.1 CEQA Significance Criteria

The criteria listed below were used to determine if the DQSP would result in significant impacts under CEQA to wildland fire ecology. These indicators are the same as the significance criteria for wildland fire listed in the CEQA Environmental Checklist, Appendix G of the state CEQA Guidelines. The Proposed Action would result in an adverse impact on wildland fire ecology if it would:

Fire-1) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

4.21.2 Applicant-Proposed Measures

There are no APMs to address potential effects of wildland fires.

4.21.3 Direct and Indirect Impacts

4.21.3.1 Alternative 1: Proposed Action

Construction

Construction activities would involve the use of vehicles and heavy machinery, which could potentially result in the ignition of a wildfire through contact between heated mufflers and vegetation. Wildfire ignition could also occur as a result of personnel smoking onsite. Even though potential ignition sources such as heavy equipment would be used during construction, the probability of a wildfire to occur as a result of Project construction would be low due to the lack of fuel. One of the first activities to occur as part of construction would be removal of vegetation and site grading, so any potential fuel material would be removed during the initial stages of construction.

If the introduction of invasive, non-native plants is not controlled during construction, over time the Project site could become dominated with non-native plants that tend to increase the frequency and severity of wildfires. As described in Section 3.21, the occurrence of wildfires in the area historically has been low; however, repeated fires are known to decrease the perennial plant cover and to aid some invasive annual plants. In turn, where they gain widespread propagation, these invasive plants would provide fuel to carry flames, potentially resulting in larger fires in the future. Surface disturbing activities and vehicle use that promotes the introduction of invasive plants would increase this likelihood.

The proposed vegetation management measures described in Section 2.3.7.2, including an Integrated Weed Management Plan, would minimize the potential for weed colonization and dominance on site by including implementation of a risk assessment of the invasive weed species currently known within the study area, procedures to control their spread on site, and procedures to help minimize the introduction of new weed species. Implementation of these measures would not completely eliminate the introduction of noxious weeds into the study area, but would minimize their introduction and control their spread on the Project site.

During construction, electrical equipment would only be energized after the necessary inspection and approval, so there is minimal risk of any electrical fire. Workers would monitor fire risks during both construction and operation, to ensure that prompt measures are taken to mitigate identified risks. In addition, transformers located on-site would be equipped with coolant that is non-flammable, biodegradable, and contains no polychlorinated biphenyls or other toxic compounds. The network of access roads would be developed to ensure that there is adequate access for fire control and emergency vehicles to the site.

Because implementation of the Project would remove the land area from other uses, it would preclude current OHV and other casual uses. As a result, implementation of the Project may slightly decrease the potential for wildfire risks associated with recreational and other casual uses.

Impacts of wildland fire that escapes control and spreads beyond the Project could include permanent damage to biological resources and other natural resources, such as air quality and water quality, in addition to the potential for loss of life and destruction of property.

As discussed in Section 2.3.7.3, the Applicant would coordinate with Riverside County to ensure that appropriate measures are implemented to control the risk of fire. Measures may include installation of an aboveground water storage tank adjacent to the O&M Building, which would be sized to meet Riverside County Fire Department requirements, as applicable, to supply sufficient fire suppression water during construction and operations.

The BLM would be first responder for wildland fires and the County for structures. The Project area falls within acceptable Total Response Time policy standards for an 'outlying' land use area based on its proximity to the nearest RCFD station (Station 45, Blythe Air Base, 17280 W. Hobson Way, Blythe, CA 92225) and that station's ability to meet the seventeen minute and 30 second response time standard. Additionally, the Project site is in close proximity to the City of Blythe Volunteer Fire Department.

Mitigation Measure FIRE-1 would require the Applicant to prepare and implement a Fire Safety Plan which incorporates the use of appropriate fire protection equipment, worker training, and consultation with local fire departments to identify appropriate protocols and procedures for fire prevention and early response to minor fire. These measures would minimize the potential for a wildfire ignition to occur as a result of Project-related construction activities and the presence of personnel on site. The plan would comply with applicable Riverside County regulations, and would be coordinated with the Riverside County Fire Department and BLM.

Operations

Wildfire risk associated with the presence of vehicles, equipment, and workers during operations would be reduced from that associated with construction. Once construction is completed, the

number of workers, vehicles, and equipment would be a small fraction of that present during construction.

During operation and maintenance of the Project, fire protection systems for the solar plant site would include a fire protection water system for protection of the O&M building and portable fire extinguishers. An aboveground process water/firewater storage tank would be located adjacent to the O&M Building. The size and dimensions of the tank would be determined based on Riverside County Fire Department requirements for firewater storage. Additional fire protection measures would include sprinkler systems in the O&M Building; a FM200 fire suppression system, or equivalent, in the facility control room at the O&M building; and portable carbon dioxide (CO₂) fire extinguishers mounted at the power conversion system units. All Project facilities would be designed, constructed, and operated in accordance with applicable fire protection and other environmental, health and safety requirements. Mitigation Measure FIRE-1 would apply to operations, as well as construction.

Electrical transmission lines can initiate a fire if an object, such as a tree limb or kite, simultaneously contacts the subtransmission line conductors and a second object, such as the ground or a portion of the supporting pole, or if two conductors make contact. Conductor-to-conductor contact can occur when extremely high winds force two conductors on a single pole to oscillate so excessively that they contact one another. This contact can result in arcing (sparks) that can ignite nearby vegetation. Electrical arcing from power is more prevalent for lower voltage distribution lines than for transmission lines such as those proposed gen-tie lines because distribution lines are typically on shorter structures and in much greater proximity to trees and vegetation. Additionally, lightning strikes on power lines could create power surges that could result in a fire. Fire hazards from transmission lines are reduced through the use of taller structures and wider rights-of-way. CPUC General Order No. 95 and PRC §4293 contain rules and regulations for vegetation clearance surrounding electrical transmission lines. In general, the potential for such fires to occur during operations is expected to be minimal, because of the lack of trees and vegetation in the Project area.

Climate change would result in a small but general increase in temperature, and also could result in an increase in the frequency of extreme weather events that could generate wildfires, such as increased frequency of drought and heat waves or wetter seasons that increase fuel loads, during operation and maintenance of the Project. Wind-blown flaming debris from a fire can ignite vegetation in the surrounding area. The Project's vegetation management measures, fire protection systems, and adherence to building codes relevant to fire safety and other applicable laws and regulations would reduce the potential for wildfire ignition and the potential for a wildfire to spread out of control. The Applicant would be required to comply with vegetation clearance requirements around structures at the site. In addition, access roads across the Project site would break the continuity of fuels at the site, which would slow or stop the progression of potential wildfires originating at the site.

Decommissioning

Impacts from decommissioning would be similar to those described for construction.

4.21.3.2 Alternative 2: Resource Avoidance Alternative

The potential for wildland fire impacts under Alternative 2 would be lower than that described for the Proposed Action. The potential risks associated with vehicles and equipment, workers smoking, invasive weeds, and electrical hazards would be the same. However, the alternative would require a smaller number of vehicles and workers, and a reduced acreage, so the chances of ignition and spread of a fire would be reduced. The provisions of Mitigation Measure Fire-1 would apply to Alternative 2, as to the Proposed Action.

4.21.3.3 Alternative 3: Reduced Project Alternative

The potential for wildland fire impacts under Alternative 3 would be lower than that described for Alternatives 1 and 2. The potential risks associated with vehicles and equipment, workers smoking, invasive weeds, and electrical hazards would be the same. However, Alternative 3 would require a smaller number of vehicles and workers, and a reduced acreage, so the chances of ignition and spread of a fire would be reduced from that of Alternatives 1 and 2. The provisions of Mitigation Measure Fire-1 would apply to Alternative 3, as to the Proposed Action.

4.21.4 Application of CEQA Significance Thresholds

Fire-1: Would the Project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Alternatives 1, 2, or 3 would not result in persons living or working in areas of greater fire risk. Alternatives 1, 2, and 3 would present a minimal risk of igniting wildland fires that would expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact would occur under Alternatives 1, 2, or 3.

4.21.5 Alternative 4: No Action Alternative

Under the No Action Alternative, BLM would not authorize a ROW grant for the Project. Because the Project would not be approved, the BLM would continue to manage the land under its land use jurisdiction consistent with the site's multiple use classification as described in the CDCA Plan, as it was amended by the Western Solar Plan.

If the site remained undeveloped, the existing environmental setting described in Section 3.21 would be maintained. The plant alliances at the Project site would not be expected to change noticeably from existing conditions and therefore, Alternative 4 would not result in any impacts to wildland fire ecology.

4.21.6 Cumulative Impacts

The geographic area for cumulative wildland fire impacts includes other projects which could combine with the effects of the Proposed Action to contribute to the risk for wildland fire. For purposes of this analysis, this area is estimated to be within one mile of the site boundary. The past, present, and reasonably foreseeable future projects included within this area include the BMSP, the transmission lines on the northern and southwestern boundaries of the Project area, the

CRSS, and the proposed RE Crimson Solar Project. The temporal scope for analysis of wildland fire impacts from the Project is the life of the Project, including construction, operations, maintenance, and decommissioning phases. Following decommissioning, the Project would no longer contribute to potential wildland fire impacts.

Alternative 1 – Proposed Action

Construction, Operations, and Decommissioning

The past, present, and reasonably foreseeable future projects could increase the risk of wildland fire by increasing the number of vehicles, equipment, and persons in the area, and through the introduction of non-native vegetation. More worker and vehicle activity in and around the Project would increase the chance of wildfire ignitions. The installation and operation of transmission lines and the use of equipment (including motor vehicles) that could spark or otherwise provide an ignition source could combine to cause or create a cumulative impact. Additionally, the increased human presence and disturbance caused by the construction, operation and overall development that would occur under the cumulative scenario could advance the rate of invasion by non-native vegetation and, thereby, contribute to fire fuel-loading that would burn with higher flames and hotter temperatures. Impacts of wildland fire could include damage to biological resources and other natural resources, such as air quality and water quality, in addition to the potential for loss of life and destruction of property. Because the plant alliances in the Project area are not fire-adapted, increases in fire frequency or size would be detrimental to the area's ecology.

Each of the past, present, and future projects would operate under the fire prevention and response requirements of the Riverside County Fire Department and/or BLM-required mitigation measures associated with fire prevention and response. Project features such as vegetation treatment, weed management, and worker safety fire precautions at all of the projects would lower the probability of such ignitions. Therefore, cumulative impacts would be less than significant.

Alternative 2 – Resource Avoidance Alternative

Construction, Operations, and Decommissioning

The incremental impact of Alternative 2 to cumulative wildland fire impacts would be slightly reduced from that of the Proposed Action, because of the lower numbers of workers, vehicles, and equipment.

Alternative 3 – Reduced Project Alternative

Construction, Operations, and Decommissioning

The incremental impact of Alternative 3 to cumulative wildland fire impacts would be slightly reduced from that of Alternatives 1 and 2, because of the lower numbers of workers, vehicles, and equipment.

Alternative 4 – No Action

For the No Action Alternative, wildfire risks would continue to be associated with OHV and other casual uses of the area.

4.21.7 Residual Impacts

Despite the fire and weed control programs that would be incorporated into the Project, the changes in vehicle use accessing the area for construction, operation, maintenance, and decommissioning would increase the likelihood of wildfires in the Project area to a slight, but unknown degree. The existing Fire Hazard Severity Zone (FHSZ) classification for this area would likely remain moderate.

CHAPTER 5 OTHER NEPA AND CEQA CONSIDERATIONS

5.1 Irreversible and Irrecoverable Commitments of Resources

State CEQA Guidelines Section 15126.2 and NEPA Regulations (40 Code of Federal Regulations [CFR] Part 1502.16, 1508.8(b)), the Bureau of Land Management (BLM) NEPA Handbook (H-1790-1 Section 9.2.9) require a discussion of irreversible or irretrievable commitments of resources that would be associated with the implementation of any Proposed Action or action alternative.

Resources irreversibly or irretrievably committed to by a Proposed Action are those used or modified on a long-term or permanent basis. An irretrievable commitment of resources includes activities such as the use of non-renewable resources like metal, wood, fuel, paper, and other natural or cultural resources. These resources are considered irretrievable in that they would be used or modified by a Proposed Action, and are no longer available for other potential uses. An irreversible commitment of resources includes activities such as the unavoidable destruction of natural resources that could not, or would not, be restored. Such a commitment could occur if releases of hazardous materials associated with the Project were to result in environmental damages that could not be remediated.

Each of the DQSP action alternatives would irreversibly and irretrievably commit resources over the 30-year life of the Project. Project construction would require use of water, electricity, and fossil fuels for delivery and assembly of components. These would be consumed during construction, and would not be retrievable following Project decommissioning. The Project components would be made of metal and glass, which would not be available for any other uses during the 30 year life of the Project. After 30 years, the Project would be decommissioned. Some of the metal and glass components would be retrieved, and would be used for other purposes. Although the land area would be re-graded and re-vegetated, it is likely to take a long time before the area would be restored to its pre-Project state; open desert lands and sensitive desert habitats can take a long time to recover from disturbances such as development.

The Project is a renewable energy project intended to generate solar energy to reduce reliance on fossil fuels. Over its projected 30-year life, the Project would contribute incrementally to the reduction in demand for fossil fuel use for electricity-generating purposes. By reducing the demand for other fuel sources, the Project would have a long-term, beneficial effect in avoiding irretrievable use of non-renewable fossil fuels by other energy projects.

5.2 Significant Unavoidable Impacts

Environmental impacts of the Project and action alternatives are discussed in Chapter 4 of this Final PA/EIS/EIR. As required by CEQA, mitigation measures have been proposed to reduce significant environmental impacts to a level of less than significant. As required by NEPA, where potential adverse environmental impacts have been identified, mitigation measures are proposed that, when implemented, would reduce the impact.

Summaries of the impacts and mitigation measures for each resource area are provided in the Executive Summary. Unavoidable, significant environmental impacts include:

- Emissions estimates for Project construction and decommissioning would exceed applicable MDAQMD daily and annual thresholds for NO_x, PM₁₀, and PM_{2.5}. The emissions estimates assume that the APMs and Mitigation Measures AQ-1 and AQ-2 would be applied, but these measures would not reduce these emissions to be below MDAQMD thresholds, resulting in a significant and unavoidable impact for construction and decommissioning. This impact would be temporary, occurring only during active construction and decommissioning, and would cease once each of these phases is completed. This impact is furthermore unavoidable, regardless of which alternative is selected.
- Though the existing visual character of the Project site is already influenced by existing transmission lines and other energy projects, the Project would result in substantial degradation of the existing visual character and visual quality of the Project site when viewed from elevated locations. Mitigation Measures VIS-1, 2, 3 and 4 would reduce visual contrast of the Project during construction, operation and decommissioning; however, these measures would not fully mitigate the significant visual impact of the Project. Therefore, the Project would result in a significant and unavoidable impact to visual resources.

5.3 Energy Conservation

Appendix F of the state CEQA Guidelines provides guidance for assessing the significance of energy conservation-related impacts of projects. The appendix identifies the following means to achieving the goal of energy conservation:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on natural gas and oil; and
- Increasing reliance on renewable energy sources.

Based on Appendix F, energy conservation-related environmental impacts would be considered significant if a project would:

- a) Result in substantially inefficient or wasteful consumption of energy;
- b) Affect local and regional energy supplies to the point that additional capacity of those energy supplies would be required;
- c) Adversely affect peak and base period demands for electricity and other forms of energy;
- d) Conflict with existing energy standards;
- e) Adversely affect existing energy resources; or
- f) Result in substantial transportation energy use requirements with no efficient transportation alternatives.

The analysis of the significance of the Proposed Project with respect to these criteria is presented below. This analysis also applies to the other action alternatives, Alternatives 2 and 3, for which energy usage would be similar to that of the Proposed Project.

- a) Result in substantially inefficient or wasteful consumption of energy.

Construction of the Project would require both direct and indirect uses of energy. Direct energy use would include the consumption of diesel fuel and gasoline for operation of construction vehicles and equipment, generators, and commuting vehicles for workers. Indirect energy use includes the energy required to make the materials and components used in construction. This includes energy used for extraction of raw materials, manufacturing, and transportation associated with manufacturing.

The consumption of energy as a result of Project construction would be irreversible. However, the highest level of consumption of energy would be temporary during the construction period, and would not continue during operations. Energy consumption required during operation and maintenance would be minimal, limited to consumption of diesel fuel and gasoline for commuting of workers and for maintenance vehicles. Energy consumption would increase again during decommissioning, but would be at a lower level than that for construction, and would also be temporary. Project activities would not result in long-term depletion of non-renewable energy resources, and would not permanently increase reliance on energy resources that are not renewable. Activities would not reduce or interrupt existing electrical or natural gas services due to insufficient supply, and are not expected to have a significant adverse effect on energy resources. Impacts from the Proposed Project on the consumption of energy would be less than significant.

b) Affect local and regional energy supplies to the point that additional capacity of those energy supplies would be required.

The impact of the Proposed Project on regional energy supplies would be beneficial. The purpose of the Project is to provide renewable energy resources to reduce reliance on non-renewable resources, and to contribute to meeting projected local peak demand electricity needs. Consequently, the Proposed Project would have a beneficial impact on local and regional energy supplies because it would ensure that current energy needs are met and that there is capacity to meet projected future energy needs. No adverse impact on local or regional energy supplies or capacity would result.

c) Adversely affect peak and base period demands for electricity and other forms of energy.

The Proposed Project would generate electrical energy which would be provided to the grid during peak and base periods. Therefore, the impact of the Project on peak and base period electrical demand would be beneficial. Because electricity for construction of the Project would be provided by generators, the Project would not be a source of electricity demand during peak periods, and there would be no adverse impact.

d) Conflict with existing energy standards.

Energy standards applicable to the Project are discussed in Sections 1.3.1 and 1.3.2, and include:

- Executive Order 13783 (March 28, 2017) and Secretary's Order 3349 (March 29, 2017) establishes policy to promote clean and safe development of the energy resources within the United States.
- Executive Order 13807 (August 15, 2017) and Secretary's Order 3355 (August 31, 2017) established policy to prioritize infrastructure projects and streamline the environmental review process.

- Section 211 of the Energy Policy Act of 2005 established a goal for the Department of the Interior to approve non-hydropower renewable energy projects on the public lands with at least 10,000 MWs of capacity by 2015. To achieve and exceed this goal, the BLM has now authorized over 17,000 MWs of non-hydropower renewable energy projects. The BLM continues to prioritize renewable energy development on public lands.
- Desert Quartzite is a covered project under Title 41 of Fixing America's Surface Transportation Act (FAST-41). FAST-41 established new coordination and oversight procedures for infrastructure projects being reviewed by Federal agencies. The intent of the act is to improve early coordination between government agencies, increase public transparency, and increase government accountability.
- SB X1-2, which increases the state's Renewable Portfolio Standard (RPS) to 33 percent by 2020, SB 350, which increases the state's RPS to 50 percent by 2030.
- Executive Order S-14-08 expanded this goal, mandating that "all retail sellers of electricity shall serve 33 percent of their load with renewable energy by 2020."

The impact of the Proposed Project would be beneficial, because assisting in meeting these standards is an objective of the Project. Operation of the Project would include ongoing maintenance activities that would require the use of trucks and equipment that use non-renewable fuels, but energy use for these purposes is expected to be minimal, requiring a negligible percentage of the overall energy used in the Project area. There would be no conflict with current energy conservation standards.

e) Adversely affect existing energy resources.

The Proposed Project would provide energy during peak hours, thus increasing the reliability of the local electrical subtransmission grid during peak demand times, and reducing the likelihood of interruptions in electrical distribution due to demand on the system. Consequently, the Proposed Project would not result in adverse impacts on energy resources.

f) Result in substantial transportation energy use requirements with no efficient transportation alternatives.

The Proposed Project construction would consume energy, in the form of diesel fuel and gasoline, during transportation of workers and materials to and from the Project site. This energy use would cease following the construction period. During operation and maintenance, transportation-related energy use would be limited to five round trips for commuting workers each day. The amount of fuel required for construction, operation, and maintenance activities would not be substantial, and energy use impacts would be less than significant.

5.4 Short-Term Uses and Long-Term Productivity

The BLM NEPA Handbook (H-1790-1 Sec. 9.2.9) and the NEPA Guidelines (40 CFR 1502.16) require a discussion of the relationship between short-term uses of the environment resulting from the Proposed Action or alternatives and the maintenance and enhancement of long-term productivity of the environment.

The environmental impacts described for the Proposed Action or alternatives in Chapter 4, *Environmental Consequences*, include short-term uses of the land area and resources during

construction and throughout the 30-year life of the Project, and permanent, adverse impacts that would affect long-term productivity of the Project area following Project decommissioning. Temporary adverse impacts to resources such as air quality would cease following construction, and would not impact the long-term productivity of the environment. Other short-term uses, such as the loss of sensitive desert habitats, could adversely affect the long-term productivity of the area, even following decommissioning. Both APMs and agency-required mitigation measures are proposed to avoid, minimize, or mitigate activities that impact long term productivity.

The Proposed Action and other action alternatives would also provide an environmental benefit by generating electric power with a minimal increase in the use of non-renewable resources such as fossil fuels. Such a benefit could influence the long-term productivity of the environment.

5.5 Growth-Inducing Impacts

NEPA Guidelines (40 CFR 1502.16) and state CEQA Guidelines Section 15126.2 require a discussion of growth-inducing impacts that potentially would result from implementation of the Proposed Action or other action alternatives. State CEQA Guidelines Section 15126.2(d) requires a discussion of the ways in which a project could foster economic or population growth, or induce additional housing, either directly or indirectly in the surrounding environment. NEPA regulations also require consideration of the growth-inducing impacts of a project. As stated in 40 C.F.R. § 1508.8(b), “indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.” Typically, a project’s growth-inducing potential would be considered significant if it leads to population increases above what is assumed in local and regional land use plans, or in projections made by regional planning authorities. Significant growth-inducing impacts also could occur if a project provides infrastructure or service capacity that would accommodate growth levels beyond those permitted by local or regional plans and policies.

The Proposed Action or alternatives would not result in permanent increase in the local population, nor would they encourage growth and development through changes in land use designations or by providing utilities and/or access to previously undeveloped areas. No lands would be converted to residential or commercial use by the Project. The transmission lines associated with Project development would connect Project electrical output to the grid, but would not provide service to previously unserved areas. No new roadways would be constructed that would provide access to nearby areas, or that would open areas to residential or commercial development.

The new electrical generating capacity provided by the Project would not be considered to have significant growth-inducing impacts. Federal and California legal mandates to increase the use of renewable energy sources are not necessarily growth-related. In 2006, the California passed the California Global Warming Solutions Act (AB 32), which required the state to reduce emissions of CO₂ and other GHGs to 1990 emission levels (a 25 percent reduction) by 2020. SB 1368 was enacted in 2006, which prohibits California electric utilities from constructing power plants or entering into long-term purchase contracts with facilities that do not meet the GHG emissions standard. The California RPS legislation requires investor-owned utilities (IOUs), publicly-owned utilities, and energy service providers to increase purchases of renewable energy such that at least 33 percent of retail sales are procured from renewable energy resources by December 31, 2020. The California mandates do not apply only to incremental power generation capacity that does not

yet exist. The required shift in generation to renewables is not merely to power future growth – it also applies to the generating capacity needed to continue to serve the current level of demand on an ongoing basis. In addition, utility organizations are obligated to be able to meet the current and projected future electrical demand of their customers – having insufficient capacity is not an option. Because electrical demand is projected to increase in the coming years, the utilities need additional capacity to meet the projected demand, as well as to replace aging generating capacity that must be retired. This need for additional capacity is forecasted with or without implementation of the Project.

CHAPTER 6 COORDINATION, CONSULTATION, AND PUBLIC INVOLVEMENT

6.1 Introduction

Consistent with CEQA and NEPA requirements, public participation and agency consultation for this Project have been accomplished through issuance of public notices, public scoping meetings, and formal and informal consultation with agencies, stakeholders, landowners, and Native American Tribes. The consultation and coordination process was used to develop the range of alternatives, data sources, range of issues to be considered, and mitigation measures for the Final PA/EIS/EIR. The Bureau of Land Management (BLM) is the NEPA Lead Agency, and the County of Riverside is the CEQA Lead Agency.

6.2 Agency Coordination

This section describes the Federal, state, and local agencies that were involved in preparation of the Final PA/EIS/EIR, and/or were otherwise consulted. Table 6-1 lists specific individuals in the agencies who have been involved or consulted, to date.

Table 6-1. Agency Contact Summary

Affiliation	Name	Role
Bureau of Land Management	Brandon Anderson	Project Manager
Bureau of Land Management	Susie Greenhalgh	Acting Project Manager
Bureau of Land Management	John Dalton	NEPA Coordinator
Bureau of Land Management	Mark Massar	Biological Resources
Bureau of Land Management	Dani Ortiz	Biological Resources
Bureau of Land Management	George Kline	Cultural Resources
Bureau of Land Management	Tiffany Arend	Archaeologist
Bureau of Land Management	James Weigand	Soils, Water, Air, Vegetation
Riverside County	Larry Ross	Principal Planner
Riverside County	Russell Brady	Solar Project Lead
Riverside County Airport Land Use Commission	John J.G. Guerin	Principal Planner
U.S. Fish and Wildlife Service	Jody Fraser	Biological Resources
U.S. Fish and Wildlife Service	Peter Sanzenbacher	Biologist
California Department of Fish and Wildlife	Shankar Sharma	Senior Environmental Specialist
California Department of Fish and Wildlife	Magdalena Rodriguez	Biologist

6.2.1 U.S. Environmental Protection Agency

The BLM and County coordinated with U.S. Environmental Protection Agency (USEPA) during the PA/EIS/EIR scoping process. USEPA submitted comments in response to the March 6, 2015 NOI to prepare the Draft EIS regarding impacts to site hydrology, air quality, and biological resources. USEPA's concerns about site hydrology are addressed in Section 4.20, air resources

are addressed in Section 4.2; and impacts to biological resources are addressed in Sections 4.3 and 4.4. The BLM will continue to coordinate with USEPA on the DQSP throughout the environmental review process.

6.2.2 Department of Defense

The BLM works closely with the Department of Defense (DoD) through the DoD Siting Clearinghouse prior to approval of ROWs for renewable energy, utility, and communication facilities to ensure that these facilities would not interfere with military training routes or special use airspace (DoD 2014; DoD 2015). This coordination is separate from input sought and received from local military installations near the Project site regarding potential hazards to air navigation. Although the Clearinghouse has no regulatory authority in permitting energy infrastructure projects, coordination with the Clearinghouse serves the national security interests of the United States by protecting DoD-specific military capabilities such as the capacity to test and evaluate military weapons and sensor systems, monitor the skies for threats, and train personnel (DoD 2016).

6.2.3 U.S. Army Corps of Engineers

On May 8, 2015, the Applicant submitted a request to the Los Angeles District of the U.S. Army Corps of Engineers (USACE) for an approved Department of the Army Jurisdictional Determination (JD) for the Project site. Additional field data in support of the request were submitted to the USACE in October 2015. In a letter dated February 18, 2016, the USACE determined that waters of the United States do not occur on the Project site. The letter is attached to the Federal Jurisdictional Delineation provided in Appendix I.

6.3 Consultation

6.3.1 Endangered Species Act Section 7

Pursuant to Endangered Species Act Section 7 consultation requirements (16 U.S.C. §1531 et seq.), the BLM will initiate consultation by submitting a Biological Assessment (BA) to the USFWS. BLM held a meeting with the USFWS regarding mitigation of impacts to biological resources on March 17, 2015 at the BLM Palm Springs-South Coast Field Office.

On October 25, 2018, BLM initiated formal consultation with USFWS, and on April 12, 2019, USFWS issued a Biological Opinion (BO), which is included within Appendix M. The BO focused on impacts to the Mojave desert tortoise, and concluded that the Project would not appreciably reduce population levels in the recovery unit, would not interfere with habitat connectivity to the west of the Project area, and would not likely result in jeopardy to the species. The BO also addressed impacts to special status bird species, including the Yuma clapper rail, southwestern willow flycatcher, least Bell's vireo, and yellow-billed cuckoo. With respect to these species, the BO concluded that the Project would not cause adverse impacts to breeding activities because suitable habitat is not present in the Project area. Although adverse effects could result from collisions with solar panels, power lines, and fences, an analysis of results from other utility-scale solar projects in the Mojave Desert indicated that collision effects at a single project would be unlikely to occur or would be considered a discountable effect. To address the additive risk of multiple hazards on a CDCA Plan level, USFWS and BLM have worked together to develop

project-to-project consistency in mortality monitoring, continue to evaluate the risk on a case-by-case basis, and develop project-specific recommendations to avoid adverse effects. The BO concluded that the Project is not likely to adversely affect the four bird species.

6.3.2 National Historic Preservation Act Section 106

Pursuant to National Historic Preservation Act Section 106 (54 U.S.C. §100101), the BLM has coordinated and consulted with potentially affected Indian tribes regarding the Project. Reasonable and good faith efforts undertaken by the BLM to consult and coordinate with the tribes for the Project to date have included written correspondence, meetings for the purposes of information and idea exchange, cultural resource-focused site visits, and responses to information requests. On March 18, 2015, the Advisory Council on Historic Properties received BLM’s notification on the proposed Desert Quartzite Solar Project undertaking. On September 30, 2014 the BLM received agreement from the State Historic Preservation Officer (SHPO) on the Area of Potential Effect (APE) pursuant to 36 CFR 800.4.

BLM held a field visit with the Colorado River Indian Tribes on June 10, 2015, with three members and one elder in attendance. BLM sent a letter to the potentially affected Indian tribes on April 20, 2016, announcing the availability of the Class III Archaeological Survey Report. This letter also summarized measures that BLM would require of the Applicant to avoid effects to the significant values of any NRHP-eligible archaeological resources.

On June 22, 2018, BLM submitted a letter to SHPO proposing a change in the APE, and SHPO concurred in a letter on October 9, 2018. On May 8, 2019, the BLM submitted a letter notifying SHPO of a change to the Direct Effects APE to incorporate the revised routes of the gen-tie lines for Alternatives 2 and 3. That letter also provided SHPO with BLM’s determinations of eligibility and finding of effect, and sought concurrence consistent with the agency’s responsibilities under Section 106 of the NHPA. Enclosure 5 to that letter summarized the NRHP eligibility and effects determinations for 22 sites. That letter concluded that Alternative would result in a direct, adverse effect to historic properties. BLM reported that, should Alternative 1 become the selected alternative, BLM would consult to resolve the adverse effect and complete the Section 106 of the NHPA process through development of a Memorandum of Agreement (MOA) prior to the ROD. The letter also reported that there would be no adverse effect to historic properties from Alternatives 2 or 3, and that there would be no indirect effects to historic properties from any alternative.

SHPO responded to the May 8, 2019 letter on May 24, 2019, requesting additional information on three sites. On June 11, 2019, BLM responded by providing additional information on three sites. This included providing an effects determination for site P-33-001821/CA/RIV-7127H, for which there would be no adverse effect from Alternatives 2 or 3. The letter also modified the previously reported eligibility determinations for the Pilot Knob–Blythe 161-kV transmission line (P-33-11110), and the Blythe–Niland 161-kV transmission line (P-33-012532/CA-RIV-7127H). Previous correspondence had reported these sites to be eligible for listing on the NRHP, but BLM had found that these transmission lines had been determined to not be NRHP eligible during previous projects.

6.3.3 Government-to-Government Tribal Consultation

BLM is participating in tribal consultation on a government-to-government level in accordance with several authorities, including NEPA; the NHPA; the American Indian Religious Freedom Act of 1978 (42 U.S.C. §1996), as amended; Executive Order 13007 (May 24, 1996), concerning Indian Sacred Sites; and Executive Order 13175 (November 6, 2000), concerning Consultation and Coordination with Indian Tribes. The consultation and discussions revealed concerns about the importance and sensitivity of cultural resources on and near the Project site, concerns about cumulative effects to cultural resources, and, further, that tribes attach significance to the broader cultural landscape. As a result of the tribal consultation process, many important cultural resources were identified in the Project area, and the Proposed Action and other action alternatives have been developed to avoid impacts to these resources.

The BLM invited Indian tribes to consult regarding the Project by letter dated August 21, 2014. The invitation was repeated in the April 20, 2016, letter that notified the tribes of the availability of the Class III Archaeological Survey Report. The invited tribes include:

1. Agua Caliente Band of Cahuilla Indians
2. Augustine Band of Cahuilla Indians
3. Cabazon Band of Mission Indians
4. Cahuilla Band of Mission Indians
5. Chemehuevi Indian Tribe
6. Cocopah Indian Tribe
7. Colorado River Indian Tribes
8. Fort Mojave Indian Tribe
9. Fort Yuma Quechan Tribe
10. Morongo Band of Mission Indians
11. Ramona Band of Mission Indians
12. San Manuel Band of Mission Indians
13. Soboba Band of Luiseno Indians
14. Torres-Martinez Desert Cahuilla Indians
15. Twenty-nine Palms Band of Mission Indians

On August 29, 2016, the Colorado River Indian Tribes responded to BLM's April 20, 2016 letter notifying the BLM of their intent to conduct additional tribal surveys. To determine the NRHP eligibility of three sites within the project, SRI completed a work plan to test for subsurface presence of archaeological data on seven thermal cobble features that were thought to be earth ovens. The plan was sent to consulting tribes on April 4, 2018 with a letter stating the purpose and intent of the work plan. Tribes were invited to participate in the test excavations, which were completed during the week of April 23, 2018. The Colorado River Indian Tribes responded to the additional testing on April 27, 2018 and provided a monitor to assist in the limited testing. On May 10, 2018, the Twenty-nine Palms Band of Mission Indians requested the BLM provide copies of the Testing Results when complete. On April 24, 2018, the Cahuilla Band of Indians indicated

they do not have knowledge of cultural resources or sites within the Project site, but wish to continue government-to-government consultation. On April 10, 2018, the San Manuel Band of Mission Indians indicated they will not be requesting consulting party status or participating in the environmental review of the project.

The BLM invited tribes to consult when the BLM made its determination of eligibility and findings of effect on June 22, 2018. In a letter dated August 9, 2018, the BLM notified the 15 Tribes, including CRIT, about the release of the Draft PA/EIS/EIR for public comment. The BLM notified the public and tribes of a public meeting on the Draft PA/EIS/EIR held by the BLM in Palm Desert and Blythe, CA on September 26 and 27, 2018 where a member of the CRIT tribe attended. Each Tribe received a CD copy of the Draft PA/EIS/EIR and instructions for commenting on it. The August 9, 2018 letter also offered government-to-government consultation with each Tribe, including CRIT, and the BLM held government-to-government consultation with the Cahuilla Band of Indians and Twenty-nine Palms Band of Mission Indians in November, 2018.

On May 9, 2019, the BLM requested the 15 tribes to provide additional information regarding the Mule Mountains that may be germane for indirect effects for all alternatives. Should the BLM select Alternative 1, or if additional information is forthcoming that would change BLMs finding of effect for Alternative 2 or 3 to an adverse effect, and if SHPO concurs with BLMs finding of effect, the BLM would conduct additional consultation when developing an MOA to resolve adverse effects.

6.3.4 County Tribal Consultation

Although formal consultation under Assembly Bill 52 (AB 52) is not required, the County did consult with interested Tribes. Notices regarding the Project were mailed to 11 Tribes who had requested notifications regarding projects located within their Traditional Use Areas. No responses were received from the Cabazon Band of Mission Indians, the Cahuilla Band of Indians, Ramona Band, Rincon Band of Luiseno Indians, Colorado River Indian Tribes, Morongo Band or the Torres Martinez Band of Cahuilla Indians. A response was received dated September 12, 2016 from the Pechanga Band of Luiseno Indians deferring to closer tribes. Three Tribes requested consultation.

The Twenty-Nine Palms Band responded in a letter dated November 18, 2016 and expressed their concern for the project being located in a culturally sensitive area. In a letter dated December 7, 2016 the Tribe requested the opportunity to review the EIR. In a letter dated November 6, 2017, the Tribe requested that the sites identified as eligible or possibly eligible for the NRHP and CRHR be avoided or, if avoidance was not possible, that the Tribe be consulted prior to archaeological data recovery or other mitigation treatment. The November 6, 2017 letter also requested additional monitoring during earthmoving activities in the Orita and Rositas soil series, the Native American Monitor(s) from the Twenty-Nine Palms Band of Mission Indians be present during any ground disturbance, and that consultation continue throughout the life of the Project.

The Soboba Band of Luiseno Indians requested consultation in a letter dated October 10, 2016. Meetings were held on October 25, 2016 and December 5, 2016. The conditions of approval for the project were provided to the Tribe on December 2, 2016. A response was received via email on December 5, 2016 concurring with the conditions and formally concluding AB52 consultation.

The Agua Caliente Band of Cahuilla Indians requested consultation in a letter dated September 16, 2016. This project was discussed on December 2, 2016, April 5, 2017 and May 5, 2017. The

conditions of approval for the project were provided to the Tribe on December 2, 2016. A formal conclusion letter was received from the Tribe dated June 08, 2017.

6.4 Public Involvement

The BLM and County solicited internal and external input on the issues, impacts, and potential alternatives to be addressed in the Draft PA/EIS/EIR for the Project, as well as the extent to which those issues and impacts would be analyzed in the document. This process is called “scoping” (40 CFR §1501.7). Internal input was provided by the BLM, Riverside County, and cooperating agencies as an interdisciplinary process, to help define issues, alternatives, and data needs. External scoping involved notification and opportunities for feedback from other agencies, organizations, tribes, local governments, and the public. Formal public scoping began following publication of a NOI under NEPA and release of a NOP under CEQA.

The NOI for the Proposed Action was published in the Federal Register on March 6, 2015 (80 FR 12195). The NOP was issued on March 13, 2015. Copies of the NOP were provided to the Office of Planning and Research (State Clearinghouse) for issuance to state agencies. One hundred and ninety copies of the NOP were distributed to Federal, state, and local agencies, responsible and trustee agencies, local governments, private organizations, Native American tribes, and other interested parties.

Both the NOI and the NOP announced the dates, times, and locations of public scoping meetings in Parker, Arizona on March 23, 2015, and in Blythe, California, on March 24, 2015. The purpose of the meetings was to inform the public about the Project; describe the purpose and need of the Project; provide information regarding the environmental review process; and gather public input regarding the scope and content of the Draft PA/EIS/EIR. The BLM, County, and Applicant presented information about the Project, alternatives, environmental review process, and potential impacts. Following the presentations, members of the public were invited to make verbal comments. A total of six individuals made public comments at the meetings. At the conclusion of the public comments, staff members from the agencies and the Applicant were available to answer questions and gather input. In addition to being published in the NOI and NOP, information regarding the public meetings was published in the Parker Pioneer, Desert Sun, and Palo Verde Times on March 18, 2015. The meetings were also announced on the BLM website for the project, at http://www.blm.gov/ca/st/en/fo/palmsprings/Desert_Quartzite.html. Notice of the meetings was also mailed to 190 recipients, which included agencies, Native American tribes, organizations, and interested individuals.

The comment period for the NOI and NOP began on March 6, 2015, and ended on April 13, 2015. A total of nine written comment letters were submitted to BLM, 13 written comment letters were submitted to the County, and four comments letters were jointly submitted to both agencies. Comments received during the scoping process are provided in Appendix H, *Public Scoping Report*.

6.5 List of Preparers

A list of persons responsible for the preparation of various sections of the Final PA/EIS/EIR or preparation of significant background materials, or who participated to a significant degree in preparing the Final PA/EIS/EIR, is presented below.

Bureau of Land Management—NEPA Lead Agency

- Brandon Anderson, Project Manager/Realty Specialist
- Susie Greenhalgh, Project Manager
- John Dalton, NEPA Specialist
- George Kline, Field Office Archaeologist
- Mark Massar, Wildlife Biologist
- Dani Ortiz, Wildlife Biologist
- Noel Ludwig, Hydrologist
- Kevin Doran, Natural Resources Specialist
- Jeff Johnston, Geologist
- JoAnn Schiffer-Burdett, Outdoor Recreation Planner
- James Weigand, Ecologist

County of Riverside—CEQA Lead Agency

- Larry Ross, Principal Planner
- Russell Brady, Solar Projects Lead

Consultants responsible for the technical analysis and document production are listed in Table 6-2, along with their qualifications.

Table 6-2. List of Consultants

Name	Qualifications	Role
TRC – Project Management Consultant and Technical Reviewer		
Richard Burke, CEP	B.S., M.S., Technology and Human Affairs, 40 years' experience	Project Manager
Chris Moore, AICP	B.A., M.S., Community and Regional Planning, 18 years' experience	Assistant Project Manager, Technical Review – Spill Prevention, Control, and Countermeasures Plan
Cara Snellen	B.S., M.S., Biology, 7 years, experience	Assistant Project Manager, 508 Compliance
Tim Henggeler	B.S., Chemical Engineering, 12 years' experience	Technical Review – Air Quality, Greenhouse Gas
Taylor VanHouten	B.S., Meteorology, 8 years' experience	Technical Review – Noise
Brian Dempsey, PE, PTOE	B.C.E., Civil Engineering, 28 years' experience	Technical Review – Traffic Impact Analysis
Erin Degutis, RLA, AICP, LEED AP	B.S., M.L.A., Landscape Architecture, 15 years' experience	Technical Review – Visual Impact Analysis
Susan Underbrink, RPA	B.A., M.A., Anthropology, 20 years' experience	Technical Review – Worker Environmental Awareness Program, Scoping

Table 6-2. List of Consultants

Name	Qualifications	Role
David Clark	B.S., M.S., Environmental Biology, 38 years' experience	Technical Review – Environmental Justice, Social and Economic Setting, Visual Resources
Karin Greenacre, PE	B.S., M.S., Chemical Engineering, 25 years' experience	Technical Review – Air Quality, Greenhouse Gas
Marlene Stephens	B.A., English, 11 years' experience	508 Compliance
Joshua Taylor	B.S., Environmental Science, 13 years' experience	Technical Review - Utilities and Public Services
Kelly Keller, P.G.	B.S., Geology, 15 years' experience	508 compliance
AECOM – PA/EIS/EIR Contractor		
Robert Dover, PG, PMP	B.S., M.S., Geology, 30 years' experience	Project Manager, Geology/Soils, Greenhouse Gas, Hazardous Materials, Mineral Resources, Transportation, Utilities, Wildland Fire
Erika Grace	B.S., Biological Sciences, M.S., Environmental Toxicology, 10 years' experience	Project Coordinator, 508 compliance
Anne Ferguson	B.S., Natural Resource Recreation and Tourism, M.S., Environmental Sustainability, 14 years' experience	Air Quality, Lands and Realty, Noise, Recreation, Special Designations
Lyndon Quon	B.A., Ecology, 26 years' experience	Vegetation, Wildlife
Mark Roll	B.S., Biology, Masters, Environmental Law and Policy, 10 years' experience	Vegetation, Wildlife
Matt Tennyson, RPA	B.A., Archaeology, M.A., Anthropology, 16 years' experience	Cultural Resources
Shannon Foglia	B.A., Anthropology, M.A., Archaeology, 7 years' experience	Cultural Resources
Lauren Trimble	B.A., M.A., Anthropology, 3 years' experience	Cultural Resources
Stev Weidlich	B.A., M.S., Anthropology, 8 years' experience	Socioeconomics and Environmental Justice
Susan Provenzano	B.A., Earth and Space Sciences, M.S., Environmental Sciences, M.S., Marine Environmental Sciences, 35 years' experience	Environmental Justice
Steve Ensley	B.S., Environmental Conservation, 12 years' experience	Geographic Information Systems
Peter Augello	B.A., Geography, M.S., Cartography/GIS, 11 years' experience	Geographic Information Systems

Table 6-2. List of Consultants

Name	Qualifications	Role
Jason Paukovits	B.A., Psychology, B.S., Environmental Resource Management, Master of Environmental Management, Master of Public Policy, 14 years' experience	Air Quality
Carmen Caceres-Schnell, PG	B.S., M.S., Geology, 18 years' experience	Water Resources