

IV.13 BLM LANDS AND REALTY—LAND USE AUTHORIZATIONS AND LAND TENURE

IV.13.1 Approach to Impact Analysis

IV.13.1.1 General Methods

Volume III, Chapter III.13 provides the Affected Environment for Bureau of Land Management (BLM) lands and realty, which includes descriptions of authorized BLM solar and wind energy rights-of-way (ROWs), transmission line corridors, land use authorizations for nonrenewable energy uses, and BLM-designated lands excluded from future renewable energy development. Because BLM lands and realty pertain only to federal lands, California Environmental Quality Act (CEQA) standards of significance and CEQA determinations are not included.

This chapter assesses potential impacts to these BLM lands from the development of utility-scale renewable energy facilities in the Plan Area through implementation of the Desert Renewable Energy Conservation Plan (DRECP or Plan). Anticipated impacts include conflicts with applicable BLM policies or regulations; conflicts with existing or authorized land uses on BLM land, including exclusion areas; and conservation actions prohibiting existing authorized land uses.

This analysis identifies potential impacts to BLM lands from the No Action Alternative and the Preferred Alternative; it then discusses the impacts associated with each alternative, followed by a comparison with the Preferred Alternative. In particular, this analysis identifies and compares the acreage of BLM land affected and conserved under each alternative. Because this is a programmatic analysis, the impact analysis is based on anticipated general impacts if renewable energy facilities are developed; it also identifies the ecoregion sub-areas that would be most affected by that development.

Where feasible, this chapter identifies mitigation measures that would reduce adverse impacts. These mitigation measures are described for decision makers as potential conditions for approval of future renewable energy projects within the Plan Area.

IV.13.1.2 CEQA Standards of Significance

This section analyzes the conflicts of the alternative management actions and Covered Activities with BLM policies or regulations and with existing or authorized uses on land under BLM jurisdiction. There are no CEQA standards of significance for the lands, so a CEQA-level analysis does not apply.

IV.13.2 Typical Impacts Common to All Action Alternatives

This section describes typical impacts to BLM lands and realty specifically associated with various renewable energy facilities and infrastructure (solar, wind, geothermal, and transmission) that would be permitted under the DRECP. All the proposed facilities built on BLM lands would exclude most other land uses, resulting in impacts to existing BLM-designated land and other authorized land uses. Therefore, impacts to BLM lands would not vary based solely upon technology type.

IV.13.2.1 Impacts of Renewable Energy and Transmission Development

This overview of impacts is partially based on the timing of renewable energy resource development. Each subsection presents a brief list of common activities associated with the phases of facility development, as presented in Volume II, Section II.3.1.3. Potential impacts to BLM lands and realty would generally be the same for each of the renewable energy technologies, as well as for transmission. However, solar and wind development may be compatible with some direction drilling or minerals mining underlying a project area.

IV.13.2.1.1 Impacts of Site Characterization

Site preparations for individual projects may include building temporary access roads, erecting meteorological towers, and geotechnical boring or other activities. Typically, impacts during this phase would be temporary and not require large amounts of land. However, construction activities could disrupt existing authorized BLM land uses, prevent access to some locations, or conflict with BLM policies or regulations.

IV.13.2.1.2 Impacts of Construction and Decommissioning

Project construction activities may include ground disturbance (grading and vegetation clearing), excavation, staging area construction, fencing, and temporary drainage. Decommissioning activities may include removing project infrastructure, recontouring to approximate original contour, and restoring vegetation. Construction and decommissioning activities would likely be temporary but would have the potential to disrupt existing authorized BLM land uses, prevent access to previously available areas, increase traffic and transportation across BLM lands, or conflict with BLM policies or regulations.

IV.13.2.1.3 Impacts of Operations and Maintenance

Project operations and maintenance activities may include energy generation operations, facility cleaning and maintenance, dust suppression, and fire and fuel management. Energy generation development on BLM lands would require long-term land use, which could convert BLM lands to permanent industrial use. Other long-term impacts could include closing

to the public areas previously open, closing open trails, and removing BLM lands from use for other nonrenewable-energy activities such as recreation, grazing, or herd management. Maintenance activities would likely be temporary but would potentially disrupt existing authorized BLM land uses or conflict with BLM policies or regulations.

IV.13.2.2 Impacts of the Reserve Design

The Conservation and Management Actions (CMAs) for these conservation lands within the reserve design would generally benefit BLM lands and realty: They would limit land disturbance and protect resources. In particular, CMAs such as standard practices for siting and design, existing road and utility corridor use, and restoration standards would benefit BLM lands. However, as noted in Volume III, Section III.13.1.1, the Federal Land Policy and Management Act of 1976 establishes BLM policies to develop and manage public lands as well as to protect and enhance them. BLM lands contain numerous designations and existing land use authorizations that may conflict with the reserve design and CMAs. For instance, BLM designations may include grazing allotments and herd management areas. Nonrenewable-energy land use authorizations may include roads, pipelines, and communications sites. Conservation actions could also limit existing authorized uses on BLM land, ultimately resulting in the reduction of available area for nonconservation uses.

IV.13.2.3 Impacts of BLM Land Use Plan Decisions

BLM lands and realty within the BLM Land Use Plan Amendment (LUPA) area would be susceptible to management decisions on allowable land uses and designations. These impacts would be the same adverse and beneficial impacts discussed previously.

In Volume II, Chapter II.3, Tables II.3-26 through II.3-28 present acreages in the BLM LUPA elements. These include Development Focus Areas (DFAs), Special Analysis Areas (SAAs), Future Assessment Areas (FAAs), portions of the reserve design (National Landscape Conservation System [NLCS], Areas of Critical Environmental Concern [ACECs], and wildlife allocations), Special Recreation Management Areas (SRMAs), and proposed and existing CMAs for numerous resource areas, including BLM lands and realty. The BLM LUPA also includes land use allocations to replace multiple-use classes, and establishes Visual Resource Management Classes. Goals, objectives, and CMAs for BLM lands and realty are in Volume II, Section II.3.2.

IV.13.2.3.1 Impacts of Renewable Energy Development and Transmission on BLM Lands

Typical impacts from the various renewable energy and transmission technologies on BLM lands would be the same as those described in Section IV.13.2.1, Impacts of Renewable Energy and Transmission Development. However, the specific locations in which energy

and transmission development will be allowed will be driven by LUPA decisions, which may encourage or restrict development in some areas.

IV.13.2.3.2 Impacts of BLM Land Designations and Management Actions

Because the BLM LUPA land designations would be managed to protect ecological, historic, cultural, scenic, scientific, and recreation resources and values, they would also provide general protection for BLM lands and realty. While other land uses are allowed within these areas, those other uses must be compatible with the resources and values that the land designation is intended to protect.

ACEC designations, NLCS lands, and wildlife allocations could limit the expansion of BLM land use authorizations, which could in turn limit available areas for renewable energy development. However, these designations could also be beneficial since disturbance limitations in those areas could also conserve and protect resource values on BLM lands.

The extent to which SRMAs are designated could increase public access to BLM-authorized lands, which could then lead to increased looting or vandalism. Effective SRMA management may provide limited protections to BLM lands.

Details on allowable uses and management of NLCS lands are provided in the proposed LUPA description in Volume II. Details on the goals, objectives, allowable uses, and management actions for each ACEC and SRMA are listed in the LUPA worksheets in Appendix L.

IV.13.2.4 Impacts of Natural Community Conservation Plan and General Conservation Plan

The Natural Community Conservation Plan (NCCP) would be administered by the California Department of Fish and Wildlife and apply to the entire Plan Area. The General Conservation Plan (GCP) would be administered by the U.S. Fish and Wildlife Service and apply to nonfederal lands, a subset of the entire Plan Area.

IV.13.2.4.1 Natural Community Conservation Plan

The impacts of renewable energy development permitted under the NCCP would be the same as those defined for Plan-wide impacts, including the typical impacts described in Section IV.13.2, Typical Impacts Common to All Action Alternatives, and for each alternative that follows.

IV.13.2.4.2 General Conservation Plan

Renewable energy development permitted under the GCP would be applicable to only nonfederal lands. Therefore, there would be no impact to BLM lands and realty.

IV.13.3 Impact Analysis by Alternative

The following sections present impact analysis for the No Action Alternative, the Preferred Alternative, and Alternatives 1 through 4.

IV.13.3.1 No Action Alternative

IV.13.3.1.1 Impacts Within the Entire Plan Area in No Action Alternative

IV.13.3.1.1.1 Impacts and Mitigation for Renewable Energy and Transmission Development in No Action Alternative

Impact Analysis

The No Action Alternative assumes the state's renewable energy goals would be achievable without the DRECP and that renewable energy facilities (up to 20,000 megawatts) and transmission facilities, along with mitigation, would continue on a project-by-project basis, consistent with past and ongoing renewable energy and transmission projects.

Impact LR-1: BLM land tenure adjustments could conflict with applicable BLM policies and regulations.

Under the No Action Alternative, existing conservation actions and management programs are assumed to be in place, and BLM would not establish a development program to provide guidance to industry and BLM field staff in the Plan Area. Table II.2-3 in Volume II, Chapter II.2, provides existing conservation planning documents within the Plan Area, which includes 26 plans. BLM's planning documents follow:

- California Desert Conservation Area (CDCA) Plan, as amended
- Amargosa River ACEC Implementation Plan
- Imperial Sand Dunes Recreational Area Resource Management Plan
- Northern and Eastern Mojave Desert Ecosystem Resource Management Plan
- West Mojave Habitat Conservation Plan

In addition to these plans, BLM participated in preparation of the Flat-Tailed Horned Lizard Rangewide Management Strategy and the Lower Colorado River Multi-Species Conserva-

tion Program. These BLM land use plans would remain in effect under this alternative; and individual projects, including a land tenure adjustment, would undergo a policy analysis to ensure there would be no conflicts with applicable BLM policies and regulations.

Impact LR-2: Development on BLM land would conflict with existing land-use authorizations.

Volume II, Chapter II.2, describes approximately 9 million acres of land, Plan-wide, within potential development areas for renewable energy development and transmission infrastructure. Under the No Action Alternative, approximately 1.4 million acres of BLM lands and realty are within the Plan Area and would be either directly or indirectly affected. Table IV.13-1 summarizes the estimated Plan Area that would intersect with BLM’s authorized renewable energy ROWs and utility corridors, by ecoregion subarea, for each of the renewable energy technologies. Solar development would have the greatest overlap with BLM lands and realty (12,000 acres), followed by wind (9,000 acres), transmission (7,000 acres), and geothermal (40 acres). This alternative has the greatest amount of BLM land that could be disturbed by solar and wind energy development.

Nonrenewable energy land use authorizations (not included in the acreage under Table IV.13-1) include roads, telephone lines, transmission lines, water and gas pipelines, communication sites, ditches, railroads, and fiber optic lines. Development of renewable energy facilities and transmission lines could disrupt existing nonrenewable energy land use authorizations. Disruptions could include limited access or restrictions to BLM land uses or disruptions to utility services. Chapter IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics, also addresses potential impacts to BLM lands, while Chapter IV.19, Transportation and Public Access, addresses impacts to public land access.

**Table IV.13-1
Potential Acres of Impacts to BLM Renewable Energy and Utility ROWs by
Technology Type by Ecoregion Subarea – No Action Alternative**

Ecoregion Subarea	BLM ROWs in Ecoregion Subarea (acres) ¹	Potential Impacts to BLM ROWs by Technology Type (acres)			
		Solar ²	Wind	Geo-thermal	Trans-mission
Cadiz Valley and Chocolate Mountains	257,000	5,000	0	0	5,000
Imperial Borrego Valley	120,000	600	1,000	40	600
Kingston and Funeral Mountains	112,000	3,000	0	0	0
Mojave and Silurian Valley	172,000	0	0	0	800

**Table IV.13-1
Potential Acres of Impacts to BLM Renewable Energy and Utility ROWs by
Technology Type by Ecoregion Subarea – No Action Alternative**

Ecoregion Subarea	BLM ROWs in Ecoregion Subarea (acres) ¹	Potential Impacts to BLM ROWs by Technology Type (acres)			
		Solar ²	Wind	Geo-thermal	Trans-mission
Owens River Valley	35,000	0	0	0	0
Panamint Death Valley	47,000	0	0	0	0
Pinto Lucerne Valley and Eastern Slopes	144,000	30	800	0	100
Piute Valley and Sacramento Mountains	105,000	0	0	0	0
Providence and Bullion Mountains	244,000	3,000	0	0	500
West Mojave and Eastern Slopes	207,000	800	7,000	0	200
Total	1,443,000	12,000	9,000	40	7,000

¹ The acreage of BLM-authorized renewable energy ROWs and utility corridors may overlap with acreage designated for renewable energy development.

² Includes ground-mounted distributed generation

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

Impact LR-3: Development within designated exclusion areas would conflict with BLM regulations and policies.

The construction and operation of renewable energy generation may occur on BLM lands with exclusion areas. The following land use plan uses may exclude renewable energy generation ROWs: ACECs, Desert Wildlife Management Areas, NLCS lands, wilderness and wilderness study areas, grazing allotments, mineral lease areas, withdrawal areas, and recreation lands. If a project site includes one of these designations, BLM determines on a case-by-case basis whether the designated area is excluded from development. Additional exclusion areas could include lands that are cooperatively managed with partner agencies. Coordination between BLM and its partner agencies typically happens during the National Environmental Policy Act planning process. In addition to other federal agencies, partner agencies may include Native American tribes and state and local governments. The scale of an exclusion area therefore ranges from a specific project site to a larger planning area. In addition, as noted in Impact LR-1, existing BLM land use plans would remain in place under

this alternative; and individual projects located within an exclusion area would undergo a policy analysis to ensure that they would not conflict with BLM policies and regulations.

Impact LR-4: Conservation actions could prohibit existing authorized land uses.

The No Action Alternative does not include conservation actions; therefore, Impact LR-4 does not apply to this alternative. As discussed in Volume II, Chapter II.2, existing protected areas and BLM LUPA Conservation Designations are assumed to be ongoing. There would be no reserve design established to guide future BLM Conservation Designations or locations where reserves could be assembled to offset the effects of renewable energy or transmission development. The conservation management from renewable energy or transmission development would be based solely on mitigations imposed on a project-by-project basis.

Laws and Regulations

In the absence of DRECP implementation, existing laws and regulations would reduce the impacts of renewable energy projects. Relevant regulations are presented in the Regulatory Setting in Volume III. Note that this Environmental Impact Report/Environmental Impact Statement (EIR/EIS) addresses amendments to BLM's land use plans. Those plans are addressed separately and are not included in this chapter. Impacts would be reduced through the following mechanisms:

- Code of Federal Regulations, Title 43–Public Lands – Sets regulations and procedures for land resource management, including ROW grants, land classifications, and land tenure.
- Federal Land Policy and Management Act – Establishes public land policy and guidelines for administration and provides for the management, protection, development, and enhancement of public lands.
- Energy Policy Act of 2005 – Authorizes the designation of corridors for oil, gas, and hydrogen pipelines, and electricity transmission and distribution facilities on federal land in the 11 contiguous western states.
- BLM Land Use Plans – Includes conservation plans and resource management plans that provide the framework that guides decisions for every action and approved land use on BLM lands. The following apply to BLM lands in the Plan Area:
 - CDCA Plan, as amended
 - Caliente Resource Management Plan
 - Bishop Resource Management Plan

Refer to Table II.2-3 for a complete list of the tiered plans that fall under the above plans.

- BLM instruction memorandums either provide new policy or procedural instructions or interpret existing regulations, policies, or instructions; they are used when there is insufficient time to issue a manual release. The instruction memorandums that apply to renewable energy development appear in Volume III, Chapter III.13, Bureau of Land Management Lands and Realty.
- BLM handbooks provide the detailed instructions needed to carry out policy and direction.
- BLM manuals are permanent records of written policies and procedural instructions.
- Programmatic EIS documents for renewable energy development provide numerous design features that would reduce the impacts of renewable energy development, including mitigation measures to identify, avoid, minimize, or mitigate potential land use conflicts on BLM lands.

Mitigation

Mitigations adopted for recently approved projects are assumed to be the same as mitigations that would apply under the No Action Alternative. The following mitigation strategies are consistent with those identified in recently published BLM programmatic documents that evaluate renewable energy development (BLM 2010, 2005) and apply to the avoidance or reduction of impacts to BLM lands and realty, depending on site- and project-specific conditions:

- Coordination with federal, state, and county agencies; tribes; property owners; and other stakeholders should take place as early as possible in the planning process to identify (1) potentially significant land use conflicts and issues, and (2) federal, state, and local laws and regulations that govern renewable energy development. Significant issues and the potential modifications to either eliminate or mitigate them should be considered in the environmental analysis of the project application.
- Where there are existing BLM land use authorizations within renewable energy development areas, BLM would notify authorization holders that an application might affect their existing authorization. BLM would also request comments from those authorization holders (Title 43, Part 2807.14, Code of Federal Regulations). Early discussion with existing land use authorization holders should take place to ensure that any issues are effectively resolved.
- Where a designated transmission corridor is within an area of a proposed renewable energy development project, the need for future transmission capacity in the corridor should be reviewed in a corridor study to determine whether it should be excluded from development or its capacity reduced. Partially relocating the corridor

to retain the current planned capacity would also be an option, as well as relocating the proposed project outside the designated corridor.

- Legal access to public lands surrounding renewable energy facilities should be retained to avoid creating areas that are either inaccessible to the public or difficult to manage. The effect on the manageability and use of public lands around the boundaries of renewable energy facilities should also be considered during the environmental analysis of a proposed project.
- Consolidation of access and other supporting infrastructure should be required for single projects and for projects that are close together to maximize the efficient use of public land.

IV.13.3.1.1.2 Impacts from Reserve Design in the No Action Alternative

The No Action Alternative has no reserve design, but there would be continued protection under existing Legislatively and Legally Protected Areas such as wilderness areas. In addition, under the No Action Alternative, renewable energy projects would still be evaluated and approved with project-specific mitigation requirements.

In Volume II, Chapter II.2, Table II.2-2(a) shows approximately 3 million acres of existing BLM Land Use Plan Conservation Designations. Table IV.13-2 provides the acres of BLM lands and realty within existing protected areas and BLM Conservation Designations including authorized renewable energy ROWs, utility corridors, and Section 368 Corridors. Under the No Action Alternative, these existing areas and Conservation Designations will continue to operate under existing conservation programs; however, there would be no reserve design to guide where future BLM Conservation Designations could be established or where reserves could offset the effects of renewable energy or transmission development. Because there would be no reserve design, there would be no impacts to nonrenewable energy land use authorizations. The National Environmental Policy Act process for individual projects would ensure that development on or in the vicinity of BLM conservation lands would be consistent with BLM plans and policies. In addition, the conservation generated from renewable energy or transmission development would be based solely on mitigation requirements, imposed on a project-by-project basis.

Table IV.13-2
Estimated Acres of BLM Renewable Energy and Utility ROWs in Conservation* by
Ecoregion Subarea – No Action Alternative

Ecoregion Subarea	BLM ROWs in Ecoregion Subarea (acres)	Existing Protected Areas (acres)	BLM Conservation Designations (acres)	Percent in Conservation
Cadiz Valley and Chocolate Mountains	257,000	29,000	48,000	29.9%
Imperial Borrego Valley	120,000	2,000	700	2.3%
Kingston and Funeral Mountains	112,000	5,000	41,000	40.9%
Mojave and Silurian Valley	172,000	6,000	90,000	55.6%
Owens River Valley	35,000	0	800	2.2%
Panamint Death Valley	47,000	0	3,000	6.1%
Pinto Lucerne Valley and Eastern Slopes	144,000	9,000	32,000	29.0%
Piute Valley and Sacramento Mountains	105,000	5,000	60,000	61.9%
Providence and Bullion Mountains	244,000	27,000	101,000	52.5%
West Mojave and Eastern Slopes	207,000	200	106,000	51.1%
Total	1,443,000	87,000	483,000	39.2%

* This summary does not reflect project-by-project mitigation generated from renewable energy and transmission development.
Note: The following general rounding rules were applied to calculated values: values greater than 1,000 were rounded to nearest 1,000; values less than 1,000 and greater than 100 were rounded to the nearest 100; values of 100 or less were rounded to the nearest 10, and therefore totals may not sum due to rounding. In cases where subtotals are provided, the subtotals and the totals are individually rounded. The totals are not a sum of the rounded subtotals; therefore the subtotals may not sum to the total within the table.

IV.13.3.1.2 Impacts on BLM Lands of Existing BLM Land Use Plans in No Action Alternative

Impacts to BLM lands under the No Action Alternative would be the same as the impacts discussed in Section IV.13.3.1.1.1, Impacts and Mitigation for Renewable Energy and Transmission Development in No Action Alternative. BLM’s land and realty management would continue under existing land use plans, policies, and regulations; and potential conflicts with renewable energy and transmission development, and their mitigation, would be resolved on a case-by-case basis. Solar energy projects would continue as an approved land use within the Solar Energy Zones approved in the Solar Programmatic Environmental Impact Statement (PEIS) Record of Decision. Existing protected areas and BLM land use

plan Conservation Designations provide ongoing conservation. Additional conservation efforts would result from renewable energy or transmission development based on the mitigation requirements imposed on a project-by-project basis.

IV.13.3.1.3 Impacts of Natural Community Conservation Plan in No Action Alternative

The NCCP would apply to all lands within the Plan Area. In the absence of Plan implementation, the NCCP would not be approved; and no incidental take permits would be issued under the NCCP. Projects would still be considered by the appropriate lead agency on an individual basis. Impacts occurring in the absence of the NCCP would be the same as those described in Section IV.13.3.1.1.1.

IV.13.3.1.4 Impacts of General Conservation Plan in No Action Alternative

As described in Appendix M, the GCP would apply to nonfederal lands in the Plan Area. Therefore, there would be no impacts to BLM lands and realty.

IV.13.3.1.5 Impacts Outside the Plan Area in No Action Alternative

IV.13.3.1.5.1 Impacts of Transmission Outside the Plan Area

Additional transmission lines would be needed to deliver renewable energy to load centers (areas of high demand) outside the Plan Area. New transmission lines outside the Plan Area would presumably use existing transmission corridors between the Plan Area and existing substations. The areas outside the Plan Area through which new transmission lines may pass include the San Diego, Los Angeles, North Palm Springs–Riverside, and Central Valley areas. There are no renewable energy ROWs on BLM lands near the Central Valley transmission corridor. The other three areas with corridors are described in Volume III, Section III.13.7.

There are few BLM lands in transmission corridors outside the Plan Area, except for the North Palm Springs–Riverside and San Diego areas. In the North Palm Springs–Riverside area, BLM lands run along the transmission corridors east of Devers Substation and immediately west in the San Gorgonio Pass along Interstate 10. A Section 368 BLM-designated Corridor (number 30-52) with a width of 10,650 feet parallels this route. Any future transmission project in a Section 368 Corridor would require National Environmental Policy Act (but not LUPA) review. For BLM lands without designated corridors, both National Environmental Policy Act and LUPA reviews are required. BLM land use plans and designations may exclude the following land use authorizations: ACECs, Desert Wildlife Management Areas, NLCS lands, wilderness and wilderness study areas, grazing allotments, mineral

lease areas, withdrawal areas, and recreation lands. BLM determines exclusions by one of those uses or designations on a case-by-case basis.

Impact LR-1: BLM land tenure adjustments could conflict with applicable BLM policies and regulations.

If a transmission line outside the Plan Area is proposed on BLM land not previously designated as a Section 368 Corridor, the proposal could conflict with applicable BLM policies and regulations and require both National Environmental Policy Act and LUPA reviews.

Impact LR-2: Development on BLM land would conflict with existing land-use authorizations.

Existing land use authorizations use some BLM lands outside the Plan Area, mostly in the North Palm Springs–Riverside area. Proposed new transmission lines would have to work within the constraints imposed by existing or proposed facilities on these tracts.

Impact LR-3: Development within designated exclusion areas would conflict with BLM regulations and policies.

The construction and operation of transmission lines outside the Plan Area are possible on BLM lands with exclusion areas. The following land use plan designations or uses may exclude renewable energy generation ROWs: ACECs, Desert Wildlife Management Areas, NLCS lands, wilderness and wilderness study areas, grazing allotments, mineral lease areas, withdrawal areas, and recreation lands. If a project site includes one of these designations, BLM determines on a case-by-case basis whether the designated area is excluded from development. Additional exclusion areas could include lands cooperatively managed with partner agencies including Native American tribes, state and local governments, and other federal agencies.

Impact LR-4: Conservation actions could prohibit existing authorized land uses.

Transmission outside the Plan Area would not be subject to conservation actions currently applicable to or proposed for the Plan Area. This impact would not apply outside the Plan Area. The CDCA Plan Amendments would prohibit some actions outside the Plan Area but within the CDCA, such as some of the transmission lines along the Interstate 10 corridor. However, these lines would be within a Section 368 BLM-designated Corridor, which is specifically designated for the construction of utilities and would not be subject to restrictions.

IV.13.3.1.5.2 Impacts of Existing BLM Land Use Plans Outside the Plan Area

Under the No Action Alternative, existing BLM CDCA California land use plan requirements would continue on CDCA lands. Under the No Action Alternative, renewable energy projects would still be developed through BLM's existing policies, including implementation of the Solar PEIS Record of Decision. Impacts on BLM lands and realty would be like those described in Section IV.13.2.1, with similar mitigation measures, on a case-by-case basis.

Existing land designations—such as existing protected areas, ACECs, and National Scenic and Historic Trails—would continue to be managed and protected. The impact analysis for these resources is provided in Chapter IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

IV.13.3.2 Preferred Alternative

IV.13.3.2.1 Plan-wide Impacts of Implementing the DRECP: Preferred Alternative

IV.13.3.2.1.1 Plan-wide Impacts and Mitigation Measures From Renewable Energy and Transmission Development

Impact Assessment

Impact LR-1: BLM land tenure adjustments could conflict with applicable BLM policies and regulations.

Direct impacts to BLM lands and realty would occur if utility-scale renewable energy projects or transmission require land tenure adjustments that conflict with existing policies or regulations. The DRECP's BLM LUPA Element was developed to site DFAs in areas that would avoid or minimize conflicts with existing BLM-administered lands. However, in the event that conflicts with BLM policies arise over a specific proposed project, a project-level analysis would be required to ensure consistency with all applicable BLM policies and regulations. Impacts would occur if a project does not comply with applicable policies and regulations. However, conflicts may be resolved with mitigation measures requiring compliance specific to the inconsistencies of that proposed development. Mitigation Measure LR-1(a) requires coordination with federal, state, and county agencies; tribes; property owners; and other stakeholders as early as possible in the planning process to identify potentially significant land use conflicts and issues.

As shown in Volume II, Chapter II.3, Figure II.3-1 (Preferred Alternative), under the Preferred Alternative, the DFAs are predominantly located in the following ecoregion subareas: West Mojave and Eastern Slopes, Imperial Borrego Valley, Cadiz Valley and Chocolate Mountains,

and Pinto Lucerne Valley and Eastern Slopes. In Volume II, Section II.3.1.3, Exhibit II.3-3 shows that within the DFAs, BLM land ownership is greatest in the Cadiz Valley and Chocolate Mountains and the Imperial Borrego Valley ecoregion subareas. Table IV.13-3 provides the acreages for potential renewable energy development within authorized BLM ROWs under each ecoregion subarea, by technology type. Over 39,000 acres of potential renewable energy development could conflict with BLM lands and policies. Wind energy development (22,000 acres) would have the greatest potential impacts, followed by solar (10,000 acres), transmission (6,000 acres), and geothermal (800 acres). The majority of these ROWs are within the Cadiz Valley and Chocolate Mountains ecoregion subarea, which would therefore have the greatest potential for conflicts with applicable policies and regulations. It is likely that project development would require project-level policy analyses to ensure compliance with all applicable policies and regulations.

Table IV.13-3
Potential Acres of Impacts to BLM Renewable Energy and Utility ROWs by
Technology Type by Ecoregion Subarea – Preferred Alternative

Ecoregion Subarea	BLM ROWs in Ecoregion Subarea (acres) ¹	Potential Impacts to BLM ROWs by Technology Type (acres)			
		<i>Solar</i> ²	<i>Wind</i>	<i>Geo-thermal</i>	<i>Trans-mission</i>
Cadiz Valley and Chocolate Mountains	257,000	7,000	18,000	0	4,000
Imperial Borrego Valley	120,000	300	0	300	500
Kingston and Funeral Mountains	112,000	0	0	0	0
Mojave and Silurian Valley	172,000	300	0	0	400
Owens River Valley	35,000	300	0	500	100
Panamint Death Valley	47,000	0	0	0	0
Pinto Lucerne Valley and Eastern Slopes	144,000	500	3,000	0	800
Piute Valley and Sacramento Mountains	105,000	0	0	0	0
Providence and Bullion Mountains	244,000	200	0	0	100
West Mojave and Eastern Slopes	207,000	1,000	1,000	0	200
Total	1,444,000	10,000	22,000	800	6,000

¹ The acreage of BLM-authorized renewable energy ROWs and utility corridors may overlap with acreage designated for renewable energy development

² Includes ground-mounted distributed generation

Note: The following general rounding rules were applied to calculated values: values greater than 1,000 were rounded to nearest 1,000; values less than 1,000 and greater than 100 were rounded to the nearest 100; values of 100 or less were

rounded to the nearest 10, and therefore totals may not sum due to rounding. In cases where subtotals are provided, the subtotals and the totals are individually rounded. The totals are not a sum of the rounded subtotals; therefore the subtotals may not sum to the total within the table.

Impact LR-2: Development on BLM land would conflict with existing land-use authorizations.

Development of utility-scale renewable energy facilities may interfere with or require modifications to existing BLM land use authorizations. Each proposed project would be subject, however, to the rights of existing land use authorizations; and BLM may not force changes in its existing authorizations. If the holder of a land use authorization agrees to modify an existing authorization, the energy project developer would be financially responsible for the cost of any modifications. For example, if an existing transmission ROW crossed a proposed renewable project site, the developer of the project would be financially responsible for rerouting the existing line. Once a renewable energy facility is authorized, the area would be excluded from other land uses that are incompatible with renewable energy facility operations. Due to the potentially large size of utility-scale renewable energy facilities, these exclusions could serve as substantial barriers to other lands uses, close existing open routes (see Chapter IV.19, Transportation and Traffic), and fragment large blocks of public land, creating isolated public land parcels that would be hard to manage. Private and state lands in proximity to renewable energy facilities could also be affected. There is also the potential to sever access routes and adversely affect nonenergy uses of other public, state, and private lands. The potential magnitude and nature of these impacts should be considered in project-specific analyses. In addition, mitigation measures could be implemented to minimize potential impacts. Mitigation Measure LR-2(a) would require sending a notification to land use authorization holders that an application might affect their existing authorization and requesting their comments. Mitigation Measure LR-2(b) would require consolidation of access and other supporting infrastructure, and Mitigation Measure LR-2(c) would require that legal access to public lands surrounding the renewable energy facilities be retained to avoid creating areas inaccessible to the public.

Table IV.13-3 shows that the majority of potential development on BLM lands and realty would be wind and solar; these two technologies would therefore have the greatest potential for conflicts with existing land use authorizations. Solar energy developments typically occupy a large industrial area that would exclude both existing and potential uses of that land. Solar facilities have a minimum expected lifetime of 30 years, with the opportunity for a lifetime of 50 years or more with equipment replacement and repowering. Similar to solar facilities, geothermal plants require large areas for exploration and drilling, which precludes other land uses. Solar and geothermal facilities therefore create new and discordant long-term land uses in areas that are largely undeveloped and rural. BLM lands and realty within the Plan Area are generally in undeveloped, rural areas. Therefore, the

development of solar and geothermal facilities could result in long-term impacts to existing BLM land use authorizations.

Wind facilities also typically occur in undeveloped rural areas. However, wind farms may be compatible with other land uses since they do not require fencing of the entire wind development site. As such, other BLM land uses, such as recreation and grazing, may be authorized on the same site. Similarly, further development of transmission line corridors in the Plan Area could occur alongside existing linear BLM land use authorizations. Therefore, the permanent conversion or preclusion of existing authorizations would not constitute a long-term impact in a wind energy or transmission development project.

Short-term impacts to existing land use authorizations would occur from construction-related disturbances, on both the project site and adjacent lands. During preconstruction and construction, these short-term impacts could include increased noise, emissions, or dust from construction equipment and degradation of scenic resources due to construction activities or equipment. The same types of nuisance impacts would occur under all three types of renewable energy and transmission development; however, the intensity and duration of those impacts may vary by technology type. Refer to the following chapters for detailed discussions of potential nuisance impacts from DRECP implementation: IV.2, Air Quality; IV.19, Transportation and Public Access; IV.20, Visual Resources; and IV.21, Noise and Vibration.

Nonrenewable energy land use authorizations (not included in the acreage in Table IV.13-1) include roads, transmission lines, telephone lines, water and gas pipelines, communication sites, ditches, railroads, and fiber optic lines. Development of renewable energy facilities and transmission lines could disrupt existing nonrenewable energy land use authorizations. Disruptions could include limited access or preclusions to BLM land uses, or disruptions to utility services. Chapter IV.14, Classifications, Allocations, and Lands with Wilderness Characteristics, also addresses potential impacts to BLM lands; Chapter IV.19, Transportation and Public Access, addresses impacts to access to public lands.

Impact LR-3: Development within designated exclusion areas would conflict with BLM regulations and policies.

Potential exclusion areas would include BLM-designated lands such as ACECs, Desert Wildlife Management Areas, NLCS lands, wilderness and wilderness study areas, grazing allotments, mineral lease areas, and recreation lands. As discussed in Volume II, Chapter II.3, the BLM LUPA component of the Preferred Alternative includes SRMAs, existing and proposed ACECs, NLCS lands, and wildlife allocations. These designations are the mechanism by which conservation will be established on BLM lands under the action alternatives. Therefore, the exclusion areas would be protected under the Preferred Alternative. Devel-

opment of wind energy facilities and transmission lines could allow for other BLM-designated land uses; but the development of solar and geothermal facilities would require the conversion of BLM land to an industrial use, which could preclude or limit all other land uses. Compliance with BLM regulations and policies for exclusion areas within a DFA would require a policy analysis on a case-by-case basis.

Impact LR-4: Conservation actions could prohibit existing authorized land uses.

In Volume II, Section II.3.1.1.4, Table II.3-4 provides the reserve design, by land ownership. BLM land within the reserve design under the Preferred Alternative includes (1) 3.2 million acres of existing BLM conservation lands, and (2) nearly 5 million acres under the proposed BLM LUPA Conservation Designations. In total, Reserve Design Lands include nearly 8.2 million acres of BLM lands in conservation.

In addition to renewable energy ROWs and transmission lines, major BLM land use authorizations include roads, highways, telephone lines, leases for recreation and other public purposes, oil and gas facilities, water and gas pipelines, water facilities, communication sites, ditches, railroads, and fiber optic lines. The reserve design would increase the acreage of existing conservation by over 5 million acres, which would then overlap with BLM land use authorizations. As shown in Table IV.13-4, the acreage of authorized wind and solar ROWs (which consist of existing and planned ROWs) within the Reserve Design Lands is 97,000 acres within existing conservation areas. Considering that nonrenewable energy land use authorizations typically consist of required infrastructure (e.g. roads, utility lines), it is therefore likely that there would be extensive overlaps between the proposed conservation actions and nonrenewable-energy BLM land use authorizations. Overlaps are more likely to occur in the more populated areas of the Reserve Design Lands, in particular, areas along major interstate highways.

**Table IV.13-4
Estimated Acres of BLM Renewable Energy and Utility ROWs in Reserve Design Lands
by Ecoregion Subarea – Preferred Alternative**

Ecoregion Subarea	BLM ROWs in Subarea (acres)	Existing Conservation Areas (acres)	BLM LUPA Conservation Designations (acres)	Conservation Planning Areas (acres)	Percent in Conservation
Cadiz Valley and Chocolate Mountains	257,000	29,000	136,000	0	64.2%
Imperial Borrego Valley	120,000	2,000	55,000	0	47.6%

**Table IV.13-4
 Estimated Acres of BLM Renewable Energy and Utility ROWs in Reserve Design Lands
 by Ecoregion Subarea – Preferred Alternative**

Ecoregion Subarea	BLM ROWs in Subarea (acres)	Existing Conservation Areas (acres)	BLM LUPA Conservation Designations (acres)	Conservation Planning Areas (acres)	Percent in Conservation
Kingston and Funeral Mountains	112,000	5,000	92,000	0	87.2%
Mojave and Silurian Valley	172,000	20,000	119,000	0	81.0%
Owens River Valley	35,000	0	16,000	0	47.4%
Panamint Death Valley	47,000	0	32,000	0	69.3%
Pinto Lucerne Valley and Eastern Slopes	144,000	9,000	79,000	0	61.1%
Piute Valley and Sacramento Mountains	105,000	5,000	72,000	0	73.6%
Providence and Bullion Mountains	244,000	27,000	192,000	0	89.6%
West Mojave and Eastern Slopes	207,000	200	145,000	0	70.0%
Total	1,444,000	97,000	940,000	0	71.8%

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

Common CMAs include measures such as the development of a DRECP acquisition priorities program, which would target high-priority conservation properties in the Plan Area to reserve and seek acquisitions from willing sellers. Management actions would use existing roads and utility corridors as much as possible to minimize the number of new roads and corridors. These measures would help minimize impacts to existing authorized BLM land uses. In addition, Mitigation Measure LR-2(a) would require notification to land use authorization holders to inform them that an application that might affect their existing authorization has been filed and to request the holders' comments.

Impacts to Study Area Lands

“Study Area Lands” refer to three categories of lands shown on alternative maps: Future Assessment Areas (FAAs), Special Analysis Areas (SAAs) and DRECP Variance Lands.

Future Assessment Areas. Lands within FAAs are neither reserve lands nor DFAs; they are simply areas that are deferred for future assessment. The future assessment will determine their suitability for renewable energy development or for ecological conservation. If renewable energy development occurs on FAA lands, a LUPA would not be required. FAAs for each alternative are included and located as shown in Table IV.1-2 and Figure II.3-1 for Preferred Alternative in Volume II. The FAAs represent areas where renewable energy development or inclusion in the reserve design could be implemented through an amendment to the DRECP, but additional assessment would be needed.

Because most of the FAAs are presented as undesignated areas in the action alternatives, there would be no difference between the FAAs and undesignated areas in the Preferred Alternative except that renewable development in an FAA would not require a BLM Land Use Plan Amendment so the environmental review process would be somewhat simpler than if the location were left undesignated. The FAAs are in areas where there are concentrations of BLM lands, so development of the FAAs could impact BLM lands through potential conflicts with existing BLM land use authorizations. The implementation of existing laws, regulations, and standards would reduce the impacts of project development on BLM lands; however, if significant impacts would still result after implementation of CMAs and compliance with applicable laws and regulations, then the specific mitigation measures recommended within this section would also be implanted.

Special Analysis Areas. There are two areas defined as SAAs, which are areas subject to ongoing analysis. These areas (in the Silurian Valley and just west of U.S. Route 395 in Kern County) have high value for renewable energy development, ecological and cultural conservation, and recreation. SAA lands are expected to be designated as DFAs or included in the reserve design.

DRECP Variance Lands. DRECP Variance Lands represent the BLM Solar PEIS Variance Lands as screened for the DRECP and EIR/EIS based on BLM screening criteria. Covered Activities could be permitted for NCCP purposes only through an NCCP amendment. However, development of renewable energy on Variance Lands would not require a BLM Land Use Plan Amendment so the environmental review process would be somewhat simpler than if the location were left undesignated. In addition, if development of the DRECP Variance Lands occurred on BLM lands, potential conflicts with existing BLM land use authorizations, plans, and policies would be unlikely considering these lands are based on BLM’s screening criteria.

Impact Reduction Strategies and Mitigation

Plan implementation would result in the conservation of some desert lands and the development of renewable energy generation and transmission facilities on other lands. There are several ways that the impacts of renewable energy development in the Plan would be lessened. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. The implementation of existing laws, orders, regulations, and standards would also reduce the impacts of project development. If significant impacts would still result after implementation of CMAs and compliance with applicable laws and regulations, then specific mitigation measures are recommended in this section.

Conservation and Management Actions

The conservation strategy for the Preferred Alternative defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes definition of the reserve design and specific CMAs for the Preferred Alternative. While the CMAs were developed for BLM lands only, this analysis assumes that all CMAs would also apply to nonfederal lands. The following are the CMAs presented in Volume II, Section II.3.1.1:

Conservation and Management Actions for the Entire Planning Area

- Identify deed-restricted donated or acquired lands as exclusion areas where development is inconsistent with the deed restrictions.
- Allow development of other acquired lands at the discretion of the California State Director.
- Process use authorization applications within National Trail Management Corridors in accordance with the management prescriptions outlined for trail corridors in this plan.
- Acquire lands within conservation areas identified by this plan, prioritizing the acquisition of lands within NLCS designated areas. Acquisition parcels should be within or adjacent to an identified conservation area and would be managed according to the conservation management requirements for the conservation area.
- The multiple-use classes used to determine land tenure in the CDCA Plan will be replaced by areas listed in the CMAs below.
- In nondesignated lands (i.e. lands not covered by the specific CMAs below), make lands available for disposal through exchange or land sale.

Exchanges with the State of California

- Continue land exchanges with the State of California as described in the CDCA Plan under Goals and Objectives.
- Enter into land exchanges with the California State Lands Commission (CSLC) which convey BLM lands suitable for, or developed as, large-scale renewable energy related projects in exchange for CSLC school lands located in and adjacent to designated conservation areas. These exchanges will follow the procedures outlined in Memorandum of Agreement Relating to Land Exchanges to Consolidate Land Parcels signed by BLM and CSLC on May 21, 2012.
- Prioritize land exchange proposals from the CSLC on available lands. If there are competing land tenure proposals (e.g. land sale or exchange), CSLC proposals that enhance revenues for schools will generally be given priority.

Conservation and Management Actions in Development Focus Areas and DRECP Study Areas

- Make lands within DFAs available for disposal by sale or exchange under Section 203(a)(1), 203(a)(3), 206, and 209 of FLPMA.
- Allow development of acquired lands within DFAs at the discretion of the California State Director unless development is incompatible with applicable deed restrictions.
- Segregate lands proposed for exchange in DFAs from the public land laws for 5 years, but allow for wind, solar, transmission or geothermal applications and their associated facilities.
- Review withdrawn lands in DFAs upon receipt of a land use authorization application and if appropriate modify to allow for issuance of land use authorizations.
- Cost recovery funding used to process a land use authorization application may be used to adjudicate and remedy any conflicting land withdrawals, if necessary.
- Make public lands in DFAs available for selection by the CSLC in lieu of base lands within DFAs. Base lands are School Lands the State of California was entitled to but did not receive title to due to prior existing encumbrances.
- If lands currently classified as FAAs become designated as DFAs through a plan amendment, they will be made available for disposal through exchange and land sales through the authorities indicated above.
- In DRECP Study Areas, make lands available for disposal by exchange, but unavailable for disposal by land sale.

Conservation and Management Actions in National Conservation Lands

- Renewable energy projects and related ancillary facilities are not allowed.
- Use authorization applications that provide a benefit to the management area or serve public interests may be allowed, unless prohibited by statute.
- Public access will be designed to facilitate or enhance NCL values identified for the subregion.
- CMAs in ACECs make available for exchange, purchase, or donation in accordance with the CMAs outlined for National Conservation Lands in Section 1.1.2.1.1.
- Make lands available for disposal through exchange if it results in a net benefit to the values of National Conservation Lands.
- Conservation and Management Actions in Areas of Critical Environmental Concern
- Use authorization applications will be evaluated in accordance with allowable uses identified in the ACEC worksheets in this plan.
- Land use authorizations are not to exceed the disturbance cap, if such a cap has been established in the worksheets for the ACEC.
- Acquire lands through exchange, purchase, or donation.
- Make lands available for disposal through exchange if it results in a net benefit to the values of the ACEC.

Conservation and Management Actions in Wildlife Allocations

- Renewable energy projects and related ancillary facilities are not allowed.
- Applications for land use authorizations that provide a benefit to the management area or serve public interests may be allowed, unless prohibited by statute.
- Acquire lands through exchange, purchase, or donation.
- Make lands unavailable for disposal.

Conservation and Management Actions in Special Recreation Management Areas

- Renewable energy projects and related ancillary facilities are not allowed.
- Land use authorizations must be consistent with the specific rulesets developed for each SRMA.
- Acquire lands through exchange, purchase, or donation.
- Lands are available for disposal to parties that will manage the land in accordance with the recreational values of the SRMA.

Laws and Regulations

Similar to the No Action Alternative, existing laws and regulations will reduce certain impacts of Plan implementation. Relevant regulations are presented in the Regulatory Setting in Volume III. The requirements of relevant laws and regulations are summarized for the No Action Alternative in Section IV.13.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, mitigation measures will be applied to further reduce some of the DRECP's adverse impacts.

The Preferred Alternative may result in beneficial impacts to BLM lands and realty because fewer areas would be available for development compared with the No Action Alternative; this would therefore reduce conflicts with existing policies, regulations, and land use authorizations. Programmatic mitigation strategies to reduce potential impacts to BLM lands and realty may avoid conflicts with stakeholders, existing land uses, and established BLM policies and regulations.

The following mitigation strategies are consistent with recently published BLM programmatic documents evaluating renewable energy development (BLM 2005, 2012) and could avoid or reduce impacts to BLM lands and realty, depending on site- and project-specific conditions:

Mitigation Measures for Impact LR-1: BLM land tenure adjustments could conflict with applicable BLM policies and regulations.

Mitigation is required to prevent inconsistencies with BLM Land Use Plan Amendments and existing BLM policy.

LR-1a **Early Coordination with All Stakeholders.** Coordination with federal, state, and county agencies; tribes; property owners; and other stakeholders should be started as early as possible in the planning process to identify:

- a) Potentially significant land use conflicts and issues.
- b) Significant issues that are raised, and potential modifications to proposed projects to eliminate or mitigate these issues, should be considered in the environmental analysis of the project application.

Mitigation Measures for Impact LR-2: Development on BLM land would conflict with existing land use authorizations.

Mitigation is required to avoid conflicts with existing land use authorizations.

- LR-2a **Notify Holders of Existing Authorizations.**** Where there are existing BLM land use authorizations within renewable energy development areas, pursuant to Title 43, Part 2807.14 of the Code of Federal Regulations, BLM would notify land use authorization holders that an application that might affect their existing land use authorization has been filed and would request the holders' comments. Early discussion with existing land use authorization holders should occur to ensure their rights are protected and any issues are resolved.
- LR-2b **Consolidate Access Roads and Infrastructure.**** Consolidation of access and other supporting infrastructure should be required for single projects and for projects that are close together to maximize the efficient use of public land.
- LR-2c **Retain Access to Public Lands.**** Legal access to public lands surrounding the renewable energy facilities should be retained to avoid creating areas that are inaccessible to the public and/or that would be difficult to manage. The effect on the manageability and uses of public lands remaining around boundaries of renewable energy facilities should be considered during the environmental analysis of project applications.

Mitigation Measures for Impact LR-3: Development within designated exclusion areas would conflict with BLM regulations and policies. No mitigation would be required.

Mitigation Measures for Impact LR-4: Conservation actions could prohibit existing authorized land uses. Mitigation Measures LR-2a (Notify land use authorization holders) would also reduce the impacts of Impact LR-4.

IV.13.3.2.1.2 Impacts of the Reserve Design

The impacts of the reserve design on BLM lands and realty are discussed under Impact LR-4. In summary, it is likely that proposed conservation lands on BLM lands would result in extensive overlaps with renewable energy and nonrenewable energy BLM land use authorizations. This is more likely to occur in the more populated areas of the Reserve Design Lands, in particular the areas along major interstate highways. However, the measures associated with the CMAs, along with Mitigation Measure LR-2a, would reduce potential conflicts with existing land use authorizations.

IV.13.3.2.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Preferred Alternative

This section addresses two components of effects of the BLM LUPA: the streamlined development of renewable energy and transmission on BLM land under LUPA and the impacts of the amended land use plans themselves.

IV.13.3.2.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land

The Plan-wide impacts to BLM lands and realty exclusively apply to BLM land. Therefore, the type of impacts related to BLM LUPA actions would be the same as in the Plan-wide impacts. In particular, Impact LR-2 addresses the potential physical impacts to BLM lands and realty as a result of renewable energy and transmission development. In summary, under Impact LR-2 (Development on BLM land would conflict with existing land-use authorizations), conflicts that may affect existing land use authorizations could result in the exclusion of other land uses, including BLM-approved uses, or potentially sever access routes, which would impact surrounding non-BLM land uses as well.

IV.13.3.2.2.2 Impacts of Changes to BLM Land Designations

The Plan-wide impacts to BLM lands and realty apply exclusively to BLM land. Therefore, the types of impacts associated with BLM land designations would be the same as for the Plan-wide impacts. In particular, impacts LR-1, LR-3, and LR-4 consider the impacts associated with potential conflicts with BLM policies and regulations. Under Impact LR-1 (BLM land tenure adjustments could conflict with applicable BLM policies and regulations), conflicts associated with changes to BLM designations would occur if an individual project would not comply with the applicable policies and regulations. However, conflicts may be resolved with mitigation measures that require compliance, specifically for the inconsistencies applicable to the proposed development. Under Impact LR-3 (Development within designated exclusion areas would conflict with BLM regulations and policies), changes to land use designations that would allow renewable energy development in exclusion areas would require conversion of BLM land to industrial use, which would in turn preclude or limit all other land uses. Compliance with BLM regulations and policies for exclusion areas within a DFA would require a policy analysis on a case-by-case basis. Impact LR-4 (Conservation actions could prohibit existing authorized land uses) considers the overlap between BLM land uses and the proposed conservation actions under the Preferred Alternative. Impacts on BLM lands and realty from designations of ACECs, wilderness areas, NLCS lands, and SRMAs could conflict with existing BLM land use authorizations and limit the expansion of those authorized uses.

IV.13.3.2.3 Impacts of Natural Community Conservation Plan: Preferred Alternative

The impacts of the NCCP for the Preferred Alternative would be the same as those defined in Section IV.13.3.2.1, Plan-wide Impacts of Implementing the DRECP: Preferred Alternative, for the Plan-wide analysis.

IV.13.3.2.4 Impacts of General Conservation Plan

There would be no impacts to BLM lands and realty under the GCP for the Preferred Alternative.

IV.13.3.2.5 Impacts Outside the Plan Area

IV.13.3.2.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on BLM lands and realty would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.13.3.1.5.2, Impacts of Existing BLM Land Use Plans Outside the Plan Area.

IV.13.3.2.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

An element of the BLM LUPA includes CDCA Plan Amendments that would apply to BLM lands outside the Plan Area. Volume II, Section II.3.4.1, provides a summary of how land uses would be treated under the DRECP's Preferred Alternative in the different land allocations. Under the proposed amendments, impacts to BLM lands would result from changes in regulations associated with land tenure adjustments. Under the existing CDCA Plan, the multiple-use class guidelines describe the land use and management guidelines for the four classes: Class C (Controlled Use), Class L (Limited Use), Class M (Moderate Use), and Class I (Intensive Use). BLM lands that do not fall within one of the four classes are considered Unclassified.

Based on existing multiple-use class guidelines, public lands in Class C, Class L, and Class I cannot be sold. Public lands in Class M and Unclassified lands may be sold in accordance with the Federal Land Policy Management Act and other applicable federal laws and regulations.

Under the Preferred Alternative's CDCA Plan Amendments, BLM may acquire land through exchange, purchase, or donation in all land use designations. However, BLM would not be able to dispose of lands within wilderness. Disposals through exchange in ACEC or NLCS that is not wilderness may be allowed if the disposal results in a net benefit to the values of the unit. Land disposals within SRMAs or Extensive Recreation Management Areas (ERMAs) may be allowed if the land will be managed in accordance with the recreational values of the SRMA or ERMA. Catellus lands (allocated the same as adjacent land—ACEC,

NLCS, DFA, etc.) are unavailable for land disposals. Within nondesignated lands (Unclassified), land sales may be allowed and BLM land may be exchanged. These amendments could mean beneficial impacts to BLM lands within the Class C and Class L designations, which focus on conservation and would not be available for development. However, some types of activities would not be allowed in these lands. New electrical generation, transmission and distribution facilities, and communication facility land use authorizations would not be allowed in wilderness (Class C), ACEC, NLCS land that is not wilderness, and SRMAs or ERMAs (Class L, M, I). These land use authorizations would be allowed in Catellus lands—with approval by the BLM State Director and if they do not conflict with deed restrictions—and in nondesignated lands. Restrictions of electrical generation, transmission, and distribution facilities on lands previously allowed for these uses could result in disruptions to existing BLM land use authorizations. Disruptions could include limited access or preclusions to BLM land uses or disruptions to utility services. Refer to the full analysis in Impact LR-2.

IV.13.3.2.6 Comparison of the Preferred Alternative With No Action Alternative

Chapter IV.27 presents a comparison of all action alternatives and the No Action Alternative across all disciplines. This section summarizes the comparison of the Preferred Alternative with the No Action Alternative.

IV.13.3.2.6.1 Preferred Alternative Compared With No Action Alternative for Plan-wide DRECP

As shown in Table II.3-1 of Volume II, the Preferred Alternative consists of approximately 2 million acres of land within the DFAs, which includes BLM lands and protected areas total 14.9 million acres (of which 6.2 million acres would be within the BLM LUPA Conservation Designations. Under the No Action Alternative, potential development areas total approximately 9 million acres and existing protected areas total 7.5 million acres. Therefore, potential impacts to BLM lands from renewable energy development under the Preferred Alternative would decrease compared with the current system of renewable energy development within the Plan Area: Fewer areas would be available for development. However, the increase in conservation areas on BLM lands may require land use planning efforts, which may include amendments to established BLM policies and regulations (in addition to the BLM LUPA, proposed in the DRECP) and potential land tenure adjustments. In addition, the establishment of conservation areas may restrict BLM-managed land use activities such as recreation, livestock grazing, and mining.

Table IV.13-3 outlines the acreage of potential renewable energy development by technology under the Preferred Alternative. The vast majority of potential impacts to BLM lands and realty would be from the development of wind and solar energy generation: 22,000 acres and 10,000 acres of disturbance, respectively. As shown in Table IV.13-1, under the

No Action Alternative, potential impacts to BLM lands would also be greatest with wind and solar development, though wind energy would be less (9,000 acres).

IV.13.3.2.6.2 Preferred Alternative Compared With No Action Alternative for the BLM Land Use Plan Amendment

The Plan-wide analysis applies only to BLM lands and realty. Therefore, the types of impacts in the BLM LUPA under the Preferred Alternative would be the same as for the Plan-wide analysis; the comparison to the No Action Alternative would also be the same.

Volume II, Section II.3.2, outlines the elements of the BLM LUPA. As shown in Volume II, Table II.3-26, the Preferred Alternative consists of approximately 367,000 acres of BLM-administered land within the DFAs and approximately 8.1 million acres of BLM lands within the Reserve Design Lands. Under the No Action Alternative, shown in Volume II, Table II.2-1, potential development areas total approximately 9.8 million acres (includes non-BLM lands); and existing protected areas total 7.5 million acres. Therefore, potential impacts to BLM-administered lands resulting from renewable energy development under the Preferred Alternative would decrease compared with the current system of renewable energy development within the Plan Area: Fewer areas would be available for development.

IV.13.3.2.6.3 Preferred Alternative Compared With No Action Alternative for NCCP

The impacts of the NCCP for the Preferred Alternative are the same as those defined in Section IV.13.3.2.1 for the Plan-wide analysis. As a result, the comparison of the Preferred Alternative with the No Action Alternative for the NCCP is the same as described for the Plan-wide DRECP.

IV.13.3.2.6.4 Preferred Alternative Compared With No Action Alternative for the GCP

The GCP would apply to nonfederal lands in the Plan Area. Therefore, there would be no impacts to BLM lands and realty under the GCP for the Preferred Alternative.

IV.13.3.3 Alternative 1

IV.13.3.3.1 Plan-wide Impacts of Implementing the DRECP: Alternative 1

IV.13.3.3.1.1 Plan-wide Impacts and Mitigation Measures From Renewable Energy and Transmission Development

Impact Assessment

The types of impacts to BLM lands and realty would be the same as discussed under the Preferred Alternative (Section IV.13.3.2.1); however, the amount of land affected in the Plan Area would differ under this alternative.

Impact LR-1: BLM land tenure adjustments could conflict with applicable BLM policies and regulations.

Direct impacts to BLM lands and realty would occur if utility-scale renewable energy projects or associated facilities would require land tenure adjustments, which would include the acquisition, lease, exchange, or disposal of BLM lands. For each proposed development, a project-level analysis would be required to ensure consistency with all applicable BLM policies and regulations. Impacts would occur if the project would not comply with the applicable policies and regulations. However, conflicts may be resolved with mitigation measures that require compliance specifically for the inconsistencies applicable to the proposed development.

As shown in Volume II, Figure II.4-1 (Alternative 1), under Alternative 1, the DFAs are predominantly in the following ecoregion subareas: West Mojave and Eastern Slopes, Imperial Borrego Valley, Cadiz Valley and Chocolate Mountains, and Pinto Lucerne Valley and Eastern Slopes. In Volume II, Section II.4.1.3, Exhibit II.4-2 shows that within DFAs, BLM land ownership is greatest in the Imperial Borrego Valley ecoregion subarea. Table IV.13-5 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea by renewable energy technology type. The total is nearly 11,000 acres; and potential impacts from solar, wind, geothermal, and transmission development are shown. Solar energy development would consist of 5,000 acres and have the greatest potential for impacts. Transmission would consist of 5,000 acres, wind energy development would consist of over 800 acres, and geothermal development would have the least potential for impact with 50 acres. The majority of these ROWs are within the following ecoregion subareas: Cadiz Valley and Chocolate Mountains, Mojave and Silurian Valley, and Pinto Lucerne Valley and Eastern Slopes. Development on BLM lands and realty would therefore have the greatest potential for conflicts with applicable policies and regulations within those ecoregion subareas, and it is likely that continued development would require project-level policy analyses to ensure compliance with all applicable policies and regulations.

**Table IV.13-5
Potential Acres of Impacts to BLM Renewable Energy and Utility ROWs by
Technology Type, by Ecoregion Subarea – Alternative 1**

Ecoregion Subarea	BLM ROWs in Ecoregion Subarea (acres) ¹	Potential Impacts to BLM ROWs by Technology Type (acres)			
		Solar ²	Wind	Geo-thermal	Trans-mission
Cadiz Valley and Chocolate Mountains	257,000	2,000	500	0	2,000
Imperial Borrego Valley	120,000	30	0	50	700

**Table IV.13-5
Potential Acres of Impacts to BLM Renewable Energy and Utility ROWs by
Technology Type, by Ecoregion Subarea – Alternative 1**

Ecoregion Subarea	BLM ROWs in Ecoregion Subarea (acres) ¹	Potential Impacts to BLM ROWs by Technology Type (acres)			
		Solar ²	Wind	Geo-thermal	Trans-mission
Kingston and Funeral Mountains	112,000	0	0	0	0
Mojave and Silurian Valley	172,000	0	0	0	600
Owens River Valley	35,000	2,000	0	0	700
Panamint Death Valley	47,000	0	0	0	0
Pinto Lucerne Valley and Eastern Slopes	144,000	500	300	0	900
Piute Valley and Sacramento Mountains	105,000	0	0	0	0
Providence and Bullion Mountains	244,000	10	0	0	200
West Mojave and Eastern Slopes	207,000	300	0	0	200
Total	1,443,000	5,000	800	50	5,000

¹ The acreage of BLM-authorized renewable energy ROWs and utility corridors overlap with acreage designated for renewable energy development

² Includes ground-mounted distributed generation

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

Impact LR-2: Development on BLM land would conflict with existing land-use authorizations.

Development of utility-scale renewable energy facilities may interfere with or require a modification to an existing BLM land use authorization. The impacts associated with the type of renewable energy technology would be the same as discussed in the Preferred Alternative. The majority of impacts under Alternative 1 would be a result of solar and transmission development, however, as opposed to the solar and wind energy development under the Preferred Alternative.

Table IV.13-5 shows that the majority of potential development on BLM lands and realty consists of solar energy generation and transmission development; these would therefore have the greatest potential for conflicts with existing land use authorizations. Potential

short- and long-term impacts would be the same as discussed under the Preferred Alternative, with the exception of geothermal development. Table IV.13-5 shows that under Alternative 1, 50 acres of geothermal development would occur on BLM lands. Therefore, the potential for impacts as a result of geothermal development would be negligible under Alternative 1.

Under Alternative 1, the potential impacts associated with nonrenewable energy land use authorizations would be the same as under the Preferred Alternative.

Impact LR-3: Development within designated exclusion areas would conflict with BLM regulations and policies.

Potential conflicts with existing exclusion areas under Alternative 1 would be the same as under the Preferred Alternative. Compliance with BLM regulations and policies for exclusion areas within a DFA would require policy analysis on a case-by-case basis.

Impact LR-4: Conservation actions could prohibit existing authorized land uses.

In Volume II, Section II.4.1.1.4, Table II.4-3 provides the reserve design, by land ownership. BLM land within the reserve design under Alternative 1 is as follows: 3.2 million acres of existing BLM conservation lands and nearly 5 million acres under the proposed BLM LUPA Conservation Designations. In total, the reserve design includes over 8.1 million BLM acres in conservation.

The reserve design would increase the acreage of existing BLM land in conservation by approximately 5.7 million acres, which would overlap with BLM land use authorizations. As shown in Table IV.13-6, the acreage of authorized wind and solar ROWs (which consist of existing and planned ROWs) within the Reserve Design Lands under Alternative 1 is 97,000 acres within existing conservation areas. Therefore, considering the extensive acreage of existing renewable energy ROWs, it is likely that there would also be overlaps with nonrenewable energy BLM land use authorizations. Potential conflicts could be resolved with measures that are part of the reserve design and the mitigation discussed in the Preferred Alternative.

**Table IV.13-6
Estimated Acres of BLM Renewable Energy and Utility ROWs in Reserve Design Lands
by Ecoregion Subarea – Alternative 1**

Ecoregion Subarea	BLM ROWs in Subarea (acres)	Existing Conservation Areas (acres)	BLM LUPA Conservation Designations (acres)	Conservation Planning Areas (acres)	Percent in Conservation
Cadiz Valley and Chocolate Mountains	257,000	29,000	155,000	0	71.4%
Imperial Borrego Valley	120,000	2,000	41,000	0	35.6%
Kingston and Funeral Mountains	112,000	5,000	94,000	0	88.5%
Mojave and Silurian Valley	172,000	20,000	102,000	0	71.0%
Owens River Valley	35,000	0	16,000	0	45.1%
Panamint Death Valley	47,000	0	32,000	0	69.3%
Pinto Lucerne Valley and Eastern Slopes	144,000	9,000	78,000	0	60.9%
Piute Valley and Sacramento Mountains	105,000	5,000	68,000	0	69.3%
Providence and Bullion Mountains	244,000	27,000	178,000	0	83.9%
West Mojave and Eastern Slopes	207,000	200	149,000	0	71.8%
Total	1,443,000	97,000	912,000	0	69.9%

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

Impacts to Study Area Lands

Future Assessment Areas. There are no FAAs in this alternative.

Special Analysis Areas. Designation of SAAs as conservation would occur within or adjacent to BLM lands. A portion of the SAAs in the Silurian Valley would be within an area already protected by BLM due to the wilderness characteristics. Therefore, additional conservation measures in this area would likely be beneficial. Nonetheless, conflicts may occur

with existing BLM land use authorizations, plans, and policies. Potential conflicts could be resolved with the mitigation measures discussed under the Preferred Alternative.

DRECP Variance Lands. DRECP Variance Lands represent the BLM Solar PEIS Variance Lands as screened for the DRECP and EIR/EIS based on BLM screening criteria. Covered Activities could be permitted for NCCP purposes only through an NCCP amendment. However, development of renewable energy on Variance Lands would not require a BLM Land Use Plan Amendment so the environmental review process would be somewhat simpler than if the location were left undesignated. In addition, if development of the DRECP Variance Lands occurred on BLM lands, potential conflicts with existing BLM land use authorizations, plans, and policies would be unlikely considering these lands are based on BLM's screening criteria.

Impact Reduction Strategies and Mitigation

Plan implementation would result in conservation of some desert lands as well as the development of renewable energy generation and transmission facilities on other lands. There are several ways that the impacts of renewable energy development would be lessened. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. Implementation of existing laws, orders, regulations, and standards would also reduce the impacts of project development. If significant impacts would still result after implementation of CMAs and compliance with applicable laws and regulations, then specific mitigation measures are recommended in this section.

Conservation and Management Actions

The conservation strategy for Alternative 1 (see Volume II, Section II.3.1.1) defines specific actions to reduce the impacts of this alternative. The conservation strategy includes the definition of the reserve design and specific CMAs for Alternative 1. CMAs for lands and realty would be the same as in the Preferred Alternative, except for land exchanges and land sales, described below.

Conservation and Management Actions for the Entire Planning Area

- In nondesignated lands (i.e., lands not covered by the specific CMAs below), make lands available for disposal through exchange or land sale.

Conservation and Management Actions in Development Focus Areas and DRECP Areas

- Make lands within DFAs available for disposal by sale or exchange under Federal Land Policy Management Act Sections 203(a)(1), 203(a)(3), 206, and 209.

- In the Plan Area, make lands unavailable for sale or exchange.

Conservation and Management Actions in National Conservation Lands

- Make available for exchange in accordance with the CMAs outlined for NLCS lands in Volume I, Section 1.1.2.1.1.
- Make unavailable for disposal.

Conservation and Management Actions in Areas of Critical Environmental Concern

- Acquire lands in ACECs through exchange, purchase, or donation.
- Make lands available for disposal through exchange if it results in a net benefit to the values of the ACEC.

Conservation and Management Actions in Wildlife Allocations

- Acquire lands in Wildlife Allocations through exchange, purchase, or donation.
- Make lands unavailable for disposal.

Conservation and Management Actions in Special Recreation Management Areas

- Acquire lands in SRMAs through exchange, purchase, or donation.
- Make lands unavailable for disposal.

Laws and Regulations

Similar to the No Action Alternative, existing laws and regulations will reduce certain impacts of Plan implementation. Relevant regulations are presented in Volume III. The requirements of relevant laws and regulations are summarized for the No Action Alternative in Section IV.13.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, implementation of mitigation measures is required to further reduce identified adverse impacts described for Impacts LR-1 through LR-4. The four mitigation measures defined for the Preferred Alternative would also apply to Alternative 1.

IV.13.3.3.1.2 Impacts from Reserve Design

Impacts to BLM lands and realty from the reserve design are discussed in the impact analysis in LR-4 (Conservation actions could prohibit existing authorized land uses).

IV.13.3.3.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 1

This section addresses two components of effects of the BLM LUPA: the streamlined development of renewable energy and transmission on BLM land under LUPA and the impacts of the amended land use plans themselves.

IV.13.3.3.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land

The types of impacts of renewable energy and transmission development on BLM land would be the same as those defined in Section IV.13.3.2.2.1, Impacts From Renewable Energy and Transmission Development on BLM Land, under the Preferred Alternative.

IV.13.3.3.2.2 Impacts of Changes to BLM Land Designations

The impacts to BLM lands and realty from changes to BLM land designations would be the same as those defined in Section IV.13.3.2.2.2, Impacts of Changes to BLM Land Designations, under the Preferred Alternative.

IV.13.3.3.3 Impacts of Natural Community Conservation Plan: Preferred Alternative

As stated in Section IV.13.3.1.3, Impacts of Natural Community Conservation Plan in No Action Alternative, the California Department of Fish and Wildlife does not have jurisdiction on BLM lands so there would be no impacts to BLM lands and realty under the NCCP.

IV.13.3.3.4 Impacts of General Conservation Plan

As stated in Section IV.13.3.1.4, Impacts of General Conservation Plan in No Action Alternative, the GCP would apply to nonfederal lands in the Plan Area. Therefore, there would be no impacts to BLM lands and realty under GCP.

IV.13.3.3.5 Impacts Outside the Plan Area

IV.13.3.3.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on BLM lands and realty would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.13.3.1.5.2.

IV.13.3.3.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

The potential impacts to BLM lands and realty would be the same under all alternatives. These impacts are as described under the Preferred Alternative in Section IV.13.3.2.5.2, Impacts of BLM LUPA Decisions Outside the Plan Area.

IV.13.3.3.6 Comparison of Alternative 1 With Preferred Alternative

Chapter IV.27 presents a comparison of all action alternatives and the No Action Alternative across all disciplines. This section summarizes the comparison of Alternative 1 with the Preferred Alternative.

IV.13.3.3.6.1 Alternative 1 Compared With Preferred Alternative for Plan-wide DRECP

According to Table II.4-1 in Volume II, Section II.4.1, Alternative 1 would result in over 1 million acres of land within the DFAs, which would include BLM lands. The Preferred Alternative consists of approximately 2 million acres of land within the DFAs, including BLM lands. Therefore, compared with the Preferred Alternative, 1 million fewer acres would be available for renewable energy development under Alternative 1. Under Alternative 1, potential impacts to BLM lands associated with renewable energy development would therefore be less than under the Preferred Alternative.

For Alternative 1, Table IV.13-5 provides the acreage of potential impacts to BLM renewable energy ROWs within each ecoregion subarea, by type of renewable energy technology. The total is nearly 11,000 acres of potential impacts from solar, wind, geothermal, and transmission development. Solar energy development would consist of 5,000 acres and would have the greatest potential for impacts, transmission would consist of 5,000 acres, wind would consist of over 800 acres, and geothermal development would have the least potential for impacts with 50 acres.

For the Preferred Alternative, Table IV.13-3 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea, by renewable energy technology type. The total acreage is over 39,000 acres of potential impacts from solar, wind, geothermal, and transmission development. Wind energy development would consist of 22,000 acres and have the greatest potential for impacts, solar would consist of 10,000 acres, transmission would consist of 6,000 acres, and geothermal would have the least potential impacts with only 800 acres.

Based on a comparison of Table IV.13-5 and Table IV.13-3, the potential for impacts to BLM lands and realty would be approximately 11,000 acres under Alternative 1 and approximately 39,000 acres under the Preferred Alternative. Therefore, the acreage of potential impacts would be larger under the Preferred Alternative.

Under Alternative 1, the majority of potential impacts to BLM lands and realty would be within the following ecoregion subareas: Cadiz Valley and Chocolate Mountains, Mojave and Silurian Valley, and Pinto Lucerne Valley and Eastern Slopes. Under the Preferred Alternative, the majority of potential development would be within the Cadiz Valley and Chocolate Mountains ecoregion subarea. Therefore, under Alternative 1, impacts to BLM lands and realty would be spread over multiple ecoregion subareas, whereas under the Preferred Alternative, the bulk of impacts would be concentrated in the Cadiz Valley and Chocolate Mountains ecoregion subarea.

IV.13.3.3.6.2 Alternative 1 Compared With Preferred Alternative for the BLM Land Use Plan Amendment

The Plan-wide analysis for impacts under Alternative 1 applies to BLM lands and realty only. Therefore, the types of impacts of streamlining renewable energy projects on BLM land and realty under Alternative 1 would be the same as in the Plan-wide analysis, so the comparison with the Preferred Alternative would also be the same.

Volume II, Section II.3.1.4, outlines the elements of the BLM LUPA under the Preferred Alternative. As shown in Volume II, Table II.3-19b, the Preferred Alternative consists of approximately 367,000 acres of BLM-administered land within the DFAs and approximately 8.2 million acres of BLM lands within the Reserve Design Lands. Under Alternative 1, as shown in Volume II, Table II.4-5b, there would be approximately 81,000 acres of potential DFAs under the BLM LUPA and approximately 8.1 million acres within the Reserve Design Lands. Therefore, potential impacts to BLM ROWs would be greater under the Preferred Alternative than under Alternative 1.

IV.13.3.3.6.3 Alternative 1 Compared With Preferred Alternative for NCCP

The impacts of the NCCP for Alternative 1 are the same as those defined in Section IV.13.3.2.1 for the Plan-wide analysis. As a result, the comparison of Alternative 1 with the Preferred Alternative for the NCCP is the same as described earlier for the Plan-wide DRECP.

IV.13.3.3.6.4 Alternative 1 Compared With Preferred Alternative for the GCP

The GCP would apply to nonfederal lands in the Plan Area. Therefore, as with the Preferred Alternative, there would be no impacts to BLM lands and realty under the GCP for Alternative 1.

IV.13.3.4 Alternative 2

IV.13.3.4.1 Plan-wide Impacts of Implementing the DRECP: Alternative 2

IV.13.3.4.1.1 Plan-wide Impacts and Mitigation Measures From Renewable Energy and Transmission Development

Impact Assessment

The types of impacts to BLM lands and realty would be the same as discussed under the Preferred Alternative (Section IV.13.3.2.1); however, the amount of land affected in the Plan Area would differ under this alternative.

Impact LR-1: BLM land tenure adjustments could conflict with applicable BLM policies and regulations.

Direct impacts to BLM lands and realty would occur if utility-scale renewable energy projects or associated facilities would require land tenure adjustments, which would include the acquisition, lease, exchange, or disposal of BLM lands. For each proposed development, a project-level analysis would be required to ensure consistency with all applicable BLM policies and regulations. Impacts would occur if the project would not comply with the applicable policies and regulations. However, conflicts may be resolved with mitigation measures that require compliance specifically for inconsistencies applicable to the proposed development.

As shown in Volume II, Figure II.5-1 (Alternative 2), under Alternative 2 the DFAs are predominantly in the following ecoregion subareas: West Mojave and Eastern Slopes, Imperial Borrego Valley, Cadiz Valley and Chocolate Mountains, and Pinto Lucerne Valley and Eastern Slopes. In Volume II, Section II.5.1.3, Exhibit II.5-2 shows that within the DFAs BLM land ownership is greatest in the following ecoregion subareas: Cadiz Valley and Chocolate Mountains, Imperial Borrego Valley, and West Mojave and Eastern Slopes. Table IV.13-7 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea by the type of renewable energy technology. The total is over 66,000 acres of impacts from solar, wind, geothermal, and transmission development. Wind consists of over 46,000 acres and would have the greatest potential for impacts, solar consists of 12,000 acres, transmission consists of 7,000 acres, and geothermal development would impact only 700 acres of development. The majority of potential development would occur within the following ecoregion subareas: Cadiz Valley and Chocolate Mountains, Pinto Lucerne Valley and Eastern Slopes, and West Mojave and Eastern Slopes. As such, development on BLM lands and realty would have the greatest potential for conflicts with applicable policies and regulations within those ecoregion

subareas. It is likely that continued development would require project-level policy analyses to ensure compliance with all applicable policies and regulations.

**Table IV.13-7
 Potential Acres of Impacts to BLM Renewable Energy and Utility ROWs by
 Technology Type, by Ecoregion Subarea – Alternative 2**

Ecoregion Subarea	BLM ROWs in Ecoregion Subarea (acres) ¹	Potential Impacts to BLM ROWs by Technology Type (acres)			
		Solar ²	Wind	Geo-thermal	Trans-mission
Cadiz Valley and Chocolate Mountains	257,000	4,000	20,000	0	2,000
Imperial Borrego Valley	120,000	2,000	14,000	300	900
Kingston and Funeral Mountains	112,000	80	400	0	500
Mojave and Silurian Valley	172,000	200	800	0	600
Owens River Valley	35,000	200	0	400	300
Panamint Death Valley	47,000	30	50	0	30
Pinto Lucerne Valley and Eastern Slopes	144,000	900	6,000	0	2,000
Piute Valley and Sacramento Mountains	105,000	0	0	0	0
Providence and Bullion Mountains	244,000	300	4,000	0	500
West Mojave and Eastern Slopes	207,000	5,000	700	0	100
Total	1,443,000	12,000	46,000	700	7,000

¹ The acreage of BLM lands include authorized renewable energy ROWs and utility corridors may overlap with acreage designated for renewable energy development

² Includes ground-mounted distributed generation

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

Impact LR-2: Development on BLM land would conflict with existing land-use authorizations.

Development of utility-scale renewable energy facilities may interfere with or require a modification to an existing BLM land use authorization. The impacts associated with the type of renewable energy technology would be the same as discussed under the Preferred Alternative.

Table IV.13-7 shows that the majority of potential development of BLM lands and realty consists of wind and solar, which indicates that the development of wind and solar energy generation would also have the greatest potential for conflicts with existing land use authorizations. The potential short- and long-term impacts associated with each technology would be the same as discussed under the Preferred Alternative.

Under Alternative 2, the potential impacts associated with nonrenewable energy land use authorizations would be the same as the Preferred Alternative.

Impact LR-3: Development within designated exclusion areas would conflict with BLM regulations and policies.

Potential conflicts with existing exclusion areas under Alternative 2 would be the same as discussed under the Preferred Alternative. Compliance with BLM regulations and policies for exclusion areas within a DFA would require a policy analysis on a case-by-case basis.

Impact LR-4: Conservation actions could prohibit existing authorized land uses.

In Volume II, Section II.5.1.2, Table II.5-3 provides the reserve design by land ownership. BLM land within the reserve design under Alternative 2 is as follows: 3.2 million acres of existing BLM conservation lands and nearly 5.2 million acres under the proposed BLM LUPA Conservation Designations. The reserve design includes over 8.6 million acres of BLM land in conservation.

The reserve design would increase the acreage of existing BLM land in conservation by approximately 5.4 million acres, which would overlap with BLM land use authorizations. As shown in Table IV.13-8, the total of authorized BLM ROWs (which consist of existing and planned ROWs) within the Reserve Design Lands under Alternative 2 is 97,000 acres within existing conservation areas. Therefore, considering the extensive acreage of existing renewable energy ROWs, it is likely that there would also be extensive overlaps with nonrenewable energy BLM land use authorizations. Potential conflicts could be resolved with measures that are part of the reserve design and the mitigation discussed under the Preferred Alternative.

**Table IV.13-8
Estimated Acres of BLM Renewable Energy and Utility ROWs in Reserve Design Lands
by Ecoregion Subarea – Alternative 2**

Ecoregion Subarea	BLM ROWs in Subarea (acres)	Existing Conservation Areas (acres)	BLM LUPA Conservation Designations (acres)	Conservation Planning Areas (acres)	Percent in Conservation
Cadiz Valley and Chocolate Mountains	257,000	29,000	154,000	0	71.1%
Imperial Borrego Valley	120,000	2,000	44,000	0	38.2%
Kingston and Funeral Mountains	112,000	5,000	97,000	0	91.8%
Mojave and Silurian Valley	172,000	20,000	137,000	0	91.2%
Owens River Valley	35,000	0	16,000	0	47.5%
Panamint Death Valley	47,000	0	34,000	0	71.9%
Pinto Lucerne Valley and Eastern Slopes	144,000	9,000	75,000	0	58.5%
Piute Valley and Sacramento Mountains	105,000	5,000	93,000	0	93.1%
Providence and Bullion Mountains	244,000	27,000	192,000	0	89.5%
West Mojave and Eastern Slopes	207,000	200	130,000	0	62.9%
Total	1,443,000	97,000	972,000	0	74.1%

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

Impacts to Study Area Lands

Future Assessment Areas. Lands within FAAs are neither reserve lands nor DFAs; they are simply areas that are deferred for future assessment. The future assessment will determine their suitability for renewable energy development or for ecological conservation. If renewable energy development occurs on FAA lands, a Land Use Plan Amendment would not be required. FAAs for each alternative are included and located as shown in Table IV.1-2 and Figure II.5-1 for Alternative 2 in Volume II. The FAAs represent areas where renew-

able energy development or inclusion in the reserve design could be implemented through an amendment to the DRECP, but additional assessment would be needed.

Because most of the FAAs are presented as undesignated areas in the action alternatives, there would be no difference between the FAAs and undesignated areas in the Preferred Alternative except that renewable development in an FAA would not require a BLM Land Use Plan Amendment so the environmental review process would be somewhat simpler than if the location were left undesignated. The FAAs are in areas where there are concentrations of BLM lands, so development of the FAAs could impact BLM lands through potential conflicts with existing BLM land use authorizations. The implementation of existing laws, regulations, and standards would reduce the impacts of project development on BLM lands; however, if significant impacts would still result after implementation of CMAs and compliance with applicable laws and regulations, then the specific mitigation measures recommended within this section would also be implanted.

Special Analysis Areas. Designating the SAAs as development would result in impacts similar to those identified for the DFAs for the Plan-wide impacts. A portion of the SAA in the Silurian Valley would be within an area that is already protected by BLM due to the wilderness characteristics. Therefore, development in the Silurian Valley would likely conflict with this protected area. In addition, portions of BLM lands are within or adjacent to the SAA in Kern County. Conflicts could occur with existing BLM land use authorizations, plans, and policies. However, these conflicts could be resolved with the mitigation measures discussed under the Preferred Alternative.

DRECP Variance Lands. DRECP Variance Lands represent the BLM Solar PEIS Variance Lands as screened for the DRECP and EIR/EIS based on BLM screening criteria. Covered Activities could be permitted for NCCP purposes only through an NCCP amendment. However, development of renewable energy on Variance Lands would not require a BLM Land Use Plan Amendment so the environmental review process would be somewhat simpler than if the location were left undesignated. In addition, if development of the DRECP Variance Lands occurred on BLM lands, potential conflicts with existing BLM land use authorizations, plans, and policies would be unlikely considering these lands are based on BLM's screening criteria.

Impact Reduction Strategies and Mitigation

Plan implementation would result in conservation of some desert lands as well as the development of renewable energy generation and transmission facilities on other lands. There are several ways in which the impacts of the renewable energy development covered by the Plan would be lessened. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. Also, the

implementation of existing laws, orders, regulations, and standards would reduce the impacts of project development. If significant impacts would still result after implementation of CMAs and compliance with applicable laws and regulations, then specific mitigation measures are recommended in this section.

Conservation and Management Actions

The conservation strategy for Alternative 2 (see Volume II, Section II.5.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes the definition of the reserve design and specific CMAs for Alternative 2. CMAs for lands and realty would be the same as in the Preferred Alternative, except for land exchanges and land sales, as described below.

Conservation and Management Actions for the Entire Planning Area

- In nondesignated lands (i.e. lands not covered by the specific CMAs, below), make lands available for disposal through exchange or land sale.

Conservation and Management Actions in Development Focus Areas and DRECP Study Areas

- Make lands within DFAs available for disposal by sale or exchange under Federal Land Policy Management Act Sections 203(a)(1), 203(a)(3), 206, and 209.
- In the Plan Area, make lands available for sale or exchange.

Conservation and Management Actions in National Conservation Lands

- Make available for exchange in accordance with the CMAs outlined for NLCS in Volume I, Section 1.1.2.1.1.
- Make unavailable for disposal.

Conservation and Management Actions in Areas of Critical Environmental Concern

- Acquire lands through exchange, purchase, or donation.
- Make lands available for disposal through exchange if it results in a net benefit to the values of the ACEC.

Conservation and Management Actions in Wildlife Allocations

- Acquire lands through exchange, purchase, or donation.
- Make lands unavailable for disposal.

Conservation and Management Actions in Special Recreation Management Areas

- Acquire lands through exchange, purchase, or donation.
- Make lands unavailable for disposal.

Laws and Regulations

Similar to the No Action Alternative, existing laws and regulations will reduce certain impacts of Plan implementation. Relevant regulations are presented in the Regulatory Setting in Volume III. The requirements of relevant laws and regulations are summarized for the No Action Alternative in Section IV.13.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, implementation of mitigation measures is required to further reduce identified adverse impacts described for Impacts LR-1 through LR-4. The four mitigation measures defined for the Preferred Alternative would also apply to Alternative 2.

IV.13.3.4.1.2 Impacts from Reserve Design

Impacts to BLM lands and realty from the reserve design are discussed in the impact analysis in LR-4 (Conservation actions could prohibit existing authorized land uses).

IV.13.3.4.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 2

This section addresses two components of effects of the BLM LUPA: the streamlined development of renewable energy and transmission on BLM land under the LUPA and the impacts of the amended land use plans themselves.

IV.13.3.4.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land

The impacts of renewable energy and transmission development on BLM land would be the same as those defined in Section IV.13.3.2.2.1 under the Preferred Alternative.

IV.13.3.4.2.2 Impacts of Changes to BLM Land Designations

The impacts to BLM lands and realty due to changes to BLM land designations would be the same as those defined in Section IV.13.3.2.2.2 under the Preferred Alternative.

IV.13.3.4.3 Impacts of Natural Community Conservation Plan: Alternative 2

The impacts of the NCCP for Alternative 2 would be the same as those defined in Section IV.13.3.2.1 for the Plan-wide analysis.

IV.13.3.4.4 Impacts of General Conservation Plan

As stated in Section IV.13.3.1.4, the GCP would apply to nonfederal lands in the Plan Area. Therefore, there would be no impacts to BLM lands and realty under GCP.

IV.13.3.4.5 Impacts Outside the Plan Area

IV.13.3.4.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on BLM lands and realty would be the same under all alternatives. These impacts are described for the No Action Alternative in Section IV.13.3.1.5.2.

IV.13.3.4.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

The potential impacts to BLM lands and realty would be the same under all alternatives. These impacts are as described under the Preferred Alternative in Section IV.13.3.2.5.2.

IV.13.3.4.6 Comparison of Alternative 2 With Preferred Alternative

Chapter IV.27 presents a comparison of all action alternatives and the No Action Alternative across all disciplines. This section summarizes the comparison of Alternative 2 with the Preferred Alternative.

IV.13.3.4.6.1 Alternative 2 Compared With Preferred Alternative for Plan-wide DRECP

According to Table II.5-1 in Volume II, Chapter II.5, Alternative 2 would result in over 2.4 million acres of land within the DFAs, which would include BLM lands. The Preferred Alternative consists of approximately 2 million acres of land within the DFAs, including BLM lands. Therefore, compared with the Preferred Alternative, Alternative 2 would have 400,000 more acres designated for renewable energy development. As such, under Alternative 2, potential impacts to BLM lands associated with renewable energy development would be greater than under the Preferred Alternative.

For Alternative 2, Table IV.13-7 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea, by type of renewable energy technology. The total is over 66,000 acres of impacts from solar, wind, geothermal, and transmission development. Wind consists of over 46,000 acres and would have the greatest potential for impacts, solar

consists of 12,000 acres, transmission consists of 7,000 acres, and geothermal development would have the least potential for impacts with 700 acres.

For the Preferred Alternative, Table IV.13-3 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea by type of renewable energy technology. The total is over 39,000 acres of potential impacts from solar, wind, geothermal, and transmission development. Wind would consist of 22,000 acres and have the greatest potential for impacts, solar would consist of 10,000 acres, transmission would consist of 6,000 acres, and geothermal development would have the least potential for impact with 800 acres.

Based on a comparison of Table IV.13-7 and Table IV.13-3, the potential for impacts to BLM lands and realty would be approximately 66,000 acres under Alternative 2 and approximately 39,000 acres under the Preferred Alternative. Therefore, the acreage of potential impacts would be greater under Alternative 2.

Under Alternative 2, the majority of potential development would occur within the following ecoregion subareas: Cadiz Valley and Chocolate Mountains, Pinto Lucerne Valley and Eastern Slopes, and West Mojave and Eastern Slopes. Under the Preferred Alternative, the majority of potential development would be within the Cadiz Valley and Chocolate Mountains ecoregion subarea. Therefore, under both alternatives, impacts to BLM lands and realty would be spread over multiple ecoregion subareas.

IV.13.3.4.6.2 Alternative 2 Compared With Preferred Alternative for the BLM Land Use Plan Amendment

The Plan-wide analysis for impacts under Alternative 2 applies to BLM lands and realty only. Therefore, the impacts of streamlining renewable energy projects on BLM land and realty under Alternative 2 would be the same as in the Plan-wide analysis, and the comparison with the Preferred Alternative would also be the same.

Volume II, Section II.3.2 outlines the elements of the BLM LUPA under the Preferred Alternative. As shown in Volume II, Table II.3-19b, the Preferred Alternative consists of approximately 367,000 acres of BLM-administered land within the DFAs, and approximately 8.2 million acres of BLM lands within the Reserve Design Lands. Under Alternative 2, as shown in Volume II, Table II.5-5b, there would be approximately 718,000 acres of potential DFAs on BLM land and approximately 8.5 million acres within the Reserve Design Lands. Therefore, potential impacts to BLM land use authorizations would be greater under Alternative 2 than under the Preferred Alternative.

IV.13.3.4.6.3 Alternative 2 Compared With Preferred Alternative for NCCP

The impacts of the NCCP for Alternative 2 are the same as those defined in Section IV.13.3.2.1 for the Plan-wide analysis. As a result, the comparison of Alternative 2 with the Preferred Alternative for the NCCP is the same as described in the Plan-wide DRECP.

IV.13.3.4.6.4 Alternative 2 Compared With Preferred Alternative for the GCP

The GCP would apply to nonfederal lands in the Plan Area. Therefore, as with the Preferred Alternative, there would be no impacts to BLM lands and realty under the GCP for Alternative 2.

IV.13.3.5 Alternative 3

IV.13.3.5.1 Plan-wide Impacts of Implementing the DRECP: Alternative 3

IV.13.3.5.1.1 Plan-wide Impacts and Mitigation Measures From Renewable Energy and Transmission Development

Impact Assessment

The types of impacts to BLM lands and realty would be the same as discussed under the Preferred Alternative (Section IV.13.3.2.1); however, the amount of land affected in the Plan Area would differ under this alternative.

Impact LR-1: BLM land tenure adjustments could conflict with applicable BLM policies and regulations.

Direct impacts to BLM lands and realty would occur if utility-scale renewable energy projects or associated facilities would require land tenure adjustments, which would include the acquisition, lease, exchange, or disposal of BLM lands. For each proposed development, a project-level analysis would be required to ensure consistency with all applicable BLM policies and regulations. Impacts would occur if the project would not comply with the applicable policies and regulations. However, conflicts may be resolved with mitigation measures that require compliance specifically for the inconsistencies applicable to the proposed development.

As shown in Volume II, Figure II.6-1 (Alternative 3), under Alternative 3 the DFAs are predominantly in the following ecoregion subareas: West Mojave and Eastern Slopes, Imperial Borrego Valley, Cadiz Valley and Chocolate Mountains, and Pinto Lucerne Valley and Eastern Slopes. In Volume II, Section II.6.1.3, Exhibit II.6-2 shows that within the DFAs, BLM land ownership is greatest in the Cadiz Valley and Chocolate Mountains and the Imperial

Borrego Valley ecoregion subareas. Table IV.13-9 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea by the type of renewable energy technology. The total is nearly 18,000 acres of impacts from solar, wind, geothermal, and transmission development. Solar energy development consists of over 7,000 acres and would have the greatest potential for impacts, wind and transmission would each consist of over 5,000 acres, and geothermal development would have the least potential for impact with 900 acres. The majority of potential development would occur within the Cadiz Valley and Chocolate Mountains and the Pinto Lucerne Valley and Eastern Slopes ecoregion subareas. As such, development on BLM lands and realty would have the greatest potential for conflicts with applicable policies and regulations within those ecoregion subareas. It is likely that continued development would require project-level policy analyses to ensure compliance with all applicable policies and regulations.

Table IV.13-9
Potential Acres of Impacts to BLM Renewable Energy and Utility ROWs by
Technology Type, by Ecoregion Subarea - Alternative 3

Ecoregion Subarea	BLM ROWs in Ecoregion Subarea (acres) ¹	Potential Impacts to BLM ROWs by Technology Type (acres)			
		<i>Solar</i> ²	<i>Wind</i>	<i>Geo-thermal</i>	<i>Trans-mission</i>
Cadiz Valley and Chocolate Mountains	257,000	5,000	3,000	0	2,000
Imperial Borrego Valley	120,000	600	40	400	600
Kingston and Funeral Mountains	112,000	0	0	0	0
Mojave and Silurian Valley	172,000	200	0	0	400
Owens River Valley	35,000	500	0	500	300
Panamint Death Valley	47,000	80	0	0	500
Pinto Lucerne Valley and Eastern Slopes	144,000	700	2,000	0	1,000
Piute Valley and Sacramento Mountains	105,000	0	0	0	0
Providence and Bullion Mountains	244,000	400	0	0	300
West Mojave and Eastern Slopes	207,000	300	50	0	300
Total	1,444,000	7,000	5,000	900	5,000

¹ The acreage of BLM lands include authorized renewable energy ROWs and utility corridors overlap with acreage designated for renewable energy development

² Includes ground-mounted distributed generation

Note: The following general rounding rules were applied to calculated values: values greater than 1,000 were rounded to nearest 1,000; values less than 1,000 and greater than 100 were rounded to the nearest 100; values of 100 or less were

rounded to the nearest 10, and therefore totals may not sum due to rounding. In cases where subtotals are provided, the subtotals and the totals are individually rounded. The totals are not a sum of the rounded subtotals; therefore the subtotals may not sum to the total within the table.

Impact LR-2: Development on BLM land would conflict with existing land-use authorizations.

Development of utility-scale renewable energy facilities may interfere with or require modification to an existing BLM land use authorization. The impacts associated with the type of renewable energy technology would be the same as discussed under the Preferred Alternative.

Table IV.13-9 shows that the majority of potential development on BLM lands consists of wind, solar, and transmission facilities; these would therefore have the greatest potential for conflicts with existing land use authorizations. The potential short- and long-term impacts associated with each technology would be the same as discussed under the Preferred Alternative.

Under Alternative 3, the potential impacts associated with nonrenewable energy land use authorizations would be the same as under the Preferred Alternative.

Impact LR-3: Development within designated exclusion areas would conflict with BLM regulations and policies.

Potential conflicts with existing exclusion areas under Alternative 3 would be the same as under the Preferred Alternative. Compliance with BLM regulations and policies for exclusion areas within a DFA would require a policy analysis on a case-by-case basis.

Impact LR-4: Conservation actions could prohibit existing authorized land uses.

In Volume II, Section II.6.1.1.4, Table II.6-3 provides the reserve design by land ownership. BLM land within the reserve design under Alternative 3 is as follows: 3.2 million acres of existing BLM conservation lands and just over 5 million acres under the proposed BLM LUPA Conservation Designations. In total, the reserve design includes over 8.3 million acres of BLM land in conservation.

The reserve design would increase the acreage of existing BLM land in conservation by approximately 5.6 million acres, which would overlap with BLM land use authorizations. As shown in Table IV.13-10, the acreage of authorized BLM ROWs (which consist of existing and planned ROWs) within the Reserve Design Lands under Alternative 3 is 97,000 acres within existing conservation areas. In addition, as stated under Alternative 3 (Volume II, Chapter 6), over 1 million acres would be within the proposed BLM LUPA Conservation Designations. Therefore, considering the extensive acreage of existing renewable energy ROWs, it is

likely that there would also be extensive overlaps with nonrenewable energy BLM land use authorizations. Potential conflicts could be resolved with measures that are part of the reserve design and the mitigation discussed under the Preferred Alternative.

Table IV.13-10
Estimated Acres of BLM Renewable Energy and Utility ROWs in Reserve Design Lands by Ecoregion Subarea – Alternative 3

Ecoregion Subarea	BLM ROWs in Subarea (acres)	Existing Conservation Areas (acres)	BLM LUPA Conservation Designations (acres)	Conservation Planning Areas (acres)	Percent in Conservation
Cadiz Valley and Chocolate Mountains	257,000	29,000	154,000	0	71.0%
Imperial Borrego Valley	120,000	2,000	55,000	0	47.3%
Kingston and Funeral Mountains	112,000	5,000	94,000	0	88.5%
Mojave and Silurian Valley	172,000	20,000	118,000	0	80.2%
Owens River Valley	35,000	0	16,000	0	47.3%
Panamint Death Valley	47,000	0	32,000	0	69.3%
Pinto Lucerne Valley and Eastern Slopes	144,000	9,000	76,000	0	59.4%
Piute Valley and Sacramento Mountains	105,000	5,000	68,000	0	69.3%
Providence and Bullion Mountains	244,000	27,000	191,000	0	89.2%
West Mojave and Eastern Slopes	207,000	200	149,000	0	71.8%
Total	1,444,000	97,000	953,000	0	72.8%

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

Impacts to Study Area Lands

Future Assessment Areas. Lands within FAAs are neither reserve lands nor DFAs; they are simply areas that are deferred for future assessment. The future assessment will determine their suitability for renewable energy development or for ecological conservation. If

renewable energy development occurs on FAA lands, a Land Use Plan Amendment would not be required. FAAs for each alternative are included and located as shown in Table IV.1-2 and Figure II.6-1 in Volume II. The FAAs represent areas where renewable energy development or inclusion in the reserve design could be implemented through an amendment to the DRECP, but additional assessment would be needed.

Because most of the FAAs are presented as undesignated areas in the action alternatives, there would be no difference between the FAAs and undesignated areas in the Preferred Alternative except that renewable development in an FAA would not require a BLM Land Use Plan Amendment so the environmental review process would be somewhat simpler than if the location were left undesignated. The FAAs are in areas where there are concentrations of BLM lands, so development of the FAAs could impact BLM lands through potential conflicts with existing BLM land use authorizations. The implementation of existing laws, regulations, and standards would reduce the impacts of project development on BLM lands; however, if significant impacts would still result after implementation of CMAs and compliance with applicable laws and regulations, then the specific mitigation measures recommended within this section would also be implanted.

Special Analysis Areas. Designation of SAAs as conservation would occur within or adjacent to BLM lands. A portion of the SAA in the Silurian Valley would be within an area that is already protected by BLM due to the wilderness characteristics. Therefore, additional conservation measures in this area would likely be beneficial. Nonetheless, conflicts may occur with existing BLM land use authorizations, plans, and policies. Potential conflicts could be resolved with the mitigation measures discussed under the Preferred Alternative.

DRECP Variance Lands. DRECP Variance Lands represent the BLM Solar PEIS Variance Lands as screened for the DRECP and EIR/EIS based on BLM screening criteria. Covered Activities could be permitted for NCCP purposes only through an NCCP amendment. However, development of renewable energy on Variance Lands would not require a BLM Land Use Plan Amendment so the environmental review process would be somewhat simpler than if the location were left undesignated. In addition, if development of the DRECP Variance Lands occurred on BLM lands, potential conflicts with existing BLM land use authorizations, plans, and policies would be unlikely considering these lands are based on BLM's screening criteria.

Impact Reduction Strategies and Mitigation

Plan implementation would result in conservation of some desert lands as well as the development of renewable energy generation and transmission facilities on other lands. There are several ways in which the impacts of the renewable energy development covered by the Plan would be lessened. First, the Plan incorporates CMAs for each alternative,

including specific biological reserve design components and LUPA components. Also, the implementation of existing laws, orders, regulations and standards would reduce the impacts of project development. If significant impacts would still result after implementation of CMAs and compliance with applicable laws and regulations, then specific mitigation measures are recommended in this section.

Conservation and Management Actions

The conservation strategy for Alternative 3 (see Volume II, Section II.6.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes definition of the reserve design and specific CMAs for Alternative 3. CMAs for lands and realty would be the same as in the Preferred Alternative, except for land exchanges and land sales, as described below.

Conservation and Management Actions for the Entire Planning Area

- In nondesignated lands (i.e. lands not covered by the specific CMAs below), make lands available for disposal through exchange or land sale.

Conservation and Management Actions in Development Focus Areas and DRECP Study Areas

- Make lands within DFAs available for disposal by sale or exchange under Federal Land Policy Management Act Sections 203(a)(1), 203(a)(3), 206, and 209.
- In the Plan Area, acquire lands through exchange.
- In the Plan Area, make lands unavailable for disposal.

Conservation and Management Actions in National Conservation Lands

- Make available for exchange in accordance with the CMAs outlined for NLCS lands in Volume I, Section 1.1.2.1.1.
- Make unavailable for disposal.

Conservation and Management Actions in Areas of Critical Environmental Concern

- Acquire lands through exchange, purchase, or donation.
- Make lands available for disposal through exchange if it results in a net benefit to the values of the ACEC.

Conservation and Management Actions in Wildlife Allocations

- Acquire lands through exchange, purchase, or donation.

- Make lands unavailable for disposal.

Conservation and Management Actions in Special Recreation Management Areas

- Acquire lands through exchange, purchase, or donation.
- Make lands unavailable for disposal.

Conservation and Management Actions in lands managed to protect wilderness characteristics

- Acquire lands in lands managed to protect wilderness characteristics through exchange, purchase, or donation.
- Make lands in lands managed to protect wilderness characteristics unavailable for disposal.

Laws and Regulations

Similar to the No Action Alternative, existing laws and regulations will reduce certain impacts of Plan implementation. Relevant regulations are presented in the Regulatory Setting in Volume III. The requirements of relevant laws and regulations are summarized for the No Action Alternative in Section IV.13.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, implementation of mitigation measures is required to further reduce identified adverse impacts described for Impacts LR-1 through LR-4. The four mitigation measures defined for the Preferred Alternative would also apply to Alternative 3.

IV.13.3.5.1.2 Impacts from Reserve Design

Impacts to BLM lands and realty from the reserve design are discussed in the impact analysis in LR-4 (Conservation actions could prohibit existing authorized land uses).

IV.13.3.5.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 3

This section addresses two components of the effects of the BLM LUPA: the streamlined development of renewable energy and transmission on BLM land under LUPA and the impacts of the amended land use plans themselves.

IV.13.3.5.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land

The impacts of renewable energy and transmission development on BLM land would be the same as those defined in Section IV.13.3.2.2.1 under the Preferred Alternative.

IV.13.3.5.2.2 Impacts of Changes to BLM Land Designations

The impacts to BLM lands and realty due to changes to BLM land designations would be the same as those defined in Section IV.13.3.2.2.2 under the Preferred Alternative.

IV.13.3.5.3 Impacts of Natural Community Conservation Plan: Alternative 3

As stated in Section IV.13.3.1.3, the California Department of Fish and Wildlife does not have jurisdiction on BLM lands; so there would be no impacts to BLM lands and realty under the NCCP.

IV.13.3.5.4 Impacts of General Conservation Plan: Alternative 3

As stated in Section IV.13.3.1.4, the GCP would apply to nonfederal lands in the Plan Area. Therefore, there would be no impacts to BLM lands and realty under GCP.

IV.13.3.5.5 Impacts Outside the Plan Area

IV.13.3.5.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on BLM lands and realty would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.13.3.1.5.2.

IV.13.3.5.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

The potential impacts to BLM lands and realty would be the same under all alternatives. These impacts are described under the Preferred Alternative in Section IV.13.3.2.5.2.

IV.13.3.5.6 Comparison of Alternative 3 with Preferred Alternative

Chapter IV.27 presents a comparison of all action alternatives and the No Action Alternative across all disciplines. This section summarizes the comparison of Alternative 3 with the Preferred Alternative.

IV.13.3.5.6.1 Alternative 3 Compared With Preferred Alternative for Plan-wide DRECP

According to Volume II, Table II.6-1, Alternative 3 would result in a total of approximately 1.4 million acres of land within the DFAs, which would include BLM lands. The Preferred

Alternative consists of approximately 2 million acres of land within the DFAs, including BLM lands. Therefore, compared with the Preferred Alternative, the amount of acreage designated for renewable energy development by Alternative 3 would be 600,000 fewer acres. Under Alternative 3, potential impacts to BLM lands associated with renewable energy development would therefore be fewer under the Preferred Alternative.

For Alternative 3, Table IV.13-9 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea, by type of renewable energy technology. The total is nearly 18,000 acres of impacts from solar, wind, geothermal, and transmission development. Solar consists of over 7,000 acres and would have the greatest potential for impacts, wind and transmission would each consist of over 5,000 acres, and geothermal would have the least potential for impacts with 900 acres.

For the Preferred Alternative, Table IV.13-3 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea by type of renewable energy technology. The total acreage is over 39,000 acres of potential impacts from solar, wind, geothermal, and transmission development. Wind would consist of 22,000 acres and have the greatest potential for impacts, solar would consist of 10,000 acres, transmission would consist of 6,000 acres, and geothermal would have the least potential for impacts with 800 acres. Based on a comparison of Table IV.13-9 and Table IV.13-3, the potential for impacts to BLM lands and realty would be approximately 18,000 acres under Alternative 3 and approximately 39,000 acres under the Preferred Alternative. Therefore, the acreage of potential impacts would be greater under the Preferred Alternative.

Under Alternative 3, the majority of potential development would occur within the Cadiz Valley and Chocolate Mountains and the Pinto Lucerne Valley and Eastern Slopes ecoregion subareas. Under the Preferred Alternative, the majority of potential development would be within the Cadiz Valley and Chocolate Mountains ecoregion subarea. Therefore, under both alternatives, impacts to BLM lands and realty would be spread over multiple ecoregion subareas.

IV.13.3.5.6.2 Alternative 3 Compared With Preferred Alternative for the BLM Land Use Plan Amendment

The Plan-wide analysis for impacts under Alternative 3 applies to BLM lands and realty only. Therefore, the impacts of streamlining renewable energy projects on BLM land and realty under Alternative 3 would be the same as in the Plan-wide analysis, so the comparison to the Preferred Alternative would also be the same.

Volume II, Section II.3.2, outlines the elements of the BLM LUPA under the Preferred Alternative. As shown in Volume II, Table II.3-19b, the Preferred Alternative consists of approxi-

mately 367,000 acres of BLM-administered land within the DFAs and approximately 8.2 million acres of BLM lands within the Reserve Design Lands. Under Alternative 3, as shown in Table II.6-5b, there would be approximately 211,000 acres of potential DFAs under the BLM LUPA and approximately 8.3 million acres within the Reserve Design Lands. Therefore, potential impacts to BLM land use authorizations would be greater under the Preferred Alternative than under Alternative 3.

IV.13.3.5.6.3 Alternative 3 Compared With Preferred Alternative for NCCP

The NCCP would apply to all lands within the Plan Area; however, the California Department of Fish and Wildlife does not have jurisdiction on BLM lands. Therefore, as with the Preferred Alternative, there would be no impacts to BLM lands and realty under the NCCP for Alternative 3.

IV.13.3.5.6.4 Alternative 3 Compared With Preferred Alternative for the GCP

The GCP would apply to nonfederal lands in the Plan Area. Therefore, as with the Preferred Alternative, there would be no impacts to BLM lands and realty under the GCP for Alternative 3.

IV.13.3.6 Alternative 4

IV.13.3.6.1 Plan-wide Impacts of Implementing the DRECP: Alternative 4

IV.13.3.6.1.1 Plan-wide Impacts and Mitigation Measures From Renewable Energy and Transmission Development

Impact Assessment

The types of impacts to BLM lands and realty would be the same as discussed under the Preferred Alternative (Section IV.13.3.2.1); however, the amount of land affected in the Plan Area would differ under this alternative.

Impact LR-1: BLM land tenure adjustments could conflict with applicable BLM policies and regulations.

Direct impacts to BLM lands and realty would occur if utility-scale renewable energy projects or associated facilities would require land tenure adjustments, which would include the acquisition, lease, exchange, or disposal of BLM lands. For each proposed development, a project-level analysis would be required to ensure consistency with all applicable BLM policies and regulations. Impacts would occur if the project would not comply with applicable policies and regulations. However, conflicts may be resolved with

mitigation measures that require compliance specifically for the inconsistencies applicable to the proposed development.

As shown in Volume II, Figure II.7-1 (Alternative 4), under Alternative 4 the DFAs are predominantly located in the following ecoregion subareas: West Mojave and Eastern Slopes, Imperial Borrego Valley, Cadiz Valley and Chocolate Mountains, and Pinto Lucerne Valley and Eastern Slopes. In Volume II, Section II.7.1.3, Exhibit II.7-2 shows that within the DFAs, BLM land ownership is greatest in the following ecoregion subareas: Cadiz Valley and Chocolate Mountains, Imperial Borrego Valley, and Owens River Valley. Table IV.13-11 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea by the type of renewable energy technology. The total is approximately 35,000 acres of impacts from solar, wind, geothermal, and transmission development. Wind consists of over 16,000 acres and would therefore have the greatest potential for impacts, solar would consist of over 11,000 acres, transmission would consist of over 7,000 acres, and geothermal would have the least potential for impacts with 600 acres. The vast majority of potential development would occur within the Cadiz Valley and Chocolate Mountains ecoregion subarea. Development on BLM lands and realty would therefore have the greatest potential for conflicts with applicable policies and regulations within that ecoregion subarea, and it is likely that continued development would require project-level policy analyses to ensure compliance with all applicable policies and regulations.

Table IV.13-11
Potential Acres of Impacts to BLM Renewable Energy and Utility ROWs by
Technology Type, by Ecoregion Subarea – Alternative 4

Ecoregion Subarea	BLM ROWs in Ecoregion Subarea (acres) ¹	Potential Impacts to BLM ROWs by Technology Type (acres)			
		<i>Solar</i> ²	<i>Wind</i>	<i>Geo-thermal</i>	<i>Trans-mission</i>
Cadiz Valley and Chocolate Mountains	257,000	10,000	15,000	0	5,000
Imperial Borrego Valley	120,000	20	0	50	300
Kingston and Funeral Mountains	112,000	0	0	0	0
Mojave and Silurian Valley	172,000	0	0	0	200
Owens River Valley	35,000	400	0	600	300
Panamint Death Valley	47,000	0	0	0	200
Pinto Lucerne Valley and Eastern Slopes	144,000	50	600	0	500
Piute Valley and Sacramento Mountains	105,000	0	0	0	0

Table IV.13-11
Potential Acres of Impacts to BLM Renewable Energy and Utility ROWs by
Technology Type, by Ecoregion Subarea – Alternative 4

Ecoregion Subarea	BLM ROWs in Ecoregion Subarea (acres) ¹	Potential Impacts to BLM ROWs by Technology Type (acres)			
		Solar ²	Wind	Geo-thermal	Trans-mission
Providence and Bullion Mountains	244,000	0	0	0	100
West Mojave and Eastern Slopes	207,000	700	900	0	100
Total	1,443,000	11,000	16,000	600	7,000

¹ The acreage of BLM-authorized renewable energy ROWs and utility corridors may overlap with acreage designated for renewable energy development

² Includes ground-mounted distributed generation

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

Impact LR-2: Development on BLM land would conflict with existing land-use authorizations.

Development of utility-scale renewable energy facilities may interfere with or require a modification to an existing BLM land use authorizations. The impacts associated with the type of renewable energy technology would be the same as discussed under the Preferred Alternative.

Table IV.13-11 shows that the majority of potential development of BLM lands and realty consists of wind, solar, and transmission facilities, which would have the greatest potential for conflicts with existing land use authorizations. The potential short- and long-term impacts associated with each type of renewable energy technology are the same as discussed under the Preferred Alternative.

Under Alternative 4, the potential impacts associated with nonrenewable energy land use authorizations would be the same as for the Preferred Alternative.

Impact LR-3: Development within designated exclusion areas would conflict with BLM regulations and policies.

Potential conflicts with existing exclusion areas under Alternative 4 would be the same as discussed under the Preferred Alternative. Compliance with BLM regulations and policies for exclusion areas within a DFA would require a policy analysis on a case-by-case basis.

Impact LR-4: Conservation actions could prohibit existing authorized land uses.

Volume II, Section II.7.1.1.4, Table II.7-3 provides the reserve design by land ownership. BLM land within the reserve design under Alternative 4 is as follows: 3.2 million acres of existing BLM conservation lands and over 4.4 million acres under the proposed BLM LUPA Conservation Designations. In total, the reserve design includes over 7.7 million acres of BLM land in conservation.

The reserve design would increase the acreage of existing BLM land in conservation by approximately 5 million acres, which would overlap with BLM land use authorizations. As shown in Table IV.13-12, the total of authorized BLM ROWs (which consist of existing and planned ROWs) within the Reserve Design Lands under Alternative 4 is 97,000 acres within existing conservation areas. Therefore, considering the extensive acreage of existing renewable energy ROWs, it is likely that there would also be extensive overlaps with nonrenewable energy BLM land use authorizations. Potential conflicts could be resolved with measures within the reserve design and the mitigation discussed under the Preferred Alternative.

**Table IV.13-12
Estimated Acres of BLM Renewable Energy and Utility ROWs in Reserve Design Lands
by Ecoregion Subarea – Alternative 4**

Ecoregion Subarea	BLM ROWs in Subarea (acres)	Existing Conservation Areas (acres)	BLM LUPA Conservation Designations (acres)	Conservation Planning Areas (acres)	Percent in Conservation
Cadiz Valley and Chocolate Mountains	257,245	29,002	100,760	0	50.4%
Imperial Borrego Valley	120,444	2,083	11,290	0	11.1%
Kingston and Funeral Mountains	111,658	4,953	71,219	0	68.2%
Mojave and Silurian Valley	172,208	19,920	92,675	0	65.4%
Owens River Valley	34,588	1	15,601	0	45.1%

Table IV.13-12
Estimated Acres of BLM Renewable Energy and Utility ROWs in Reserve Design Lands
by Ecoregion Subarea – Alternative 4

Ecoregion Subarea	BLM ROWs in Subarea (acres)	Existing Conservation Areas (acres)	BLM LUPA Conservation Designations (acres)	Conservation Planning Areas (acres)	Percent in Conservation
Panamint Death Valley	46,732	0	32,378	0	69.3%
Pinto Lucerne Valley and Eastern Slopes	144,207	9,331	69,171	0	54.4%
Piute Valley and Sacramento Mountains	105,085	5,114	67,655	0	69.3%
Providence and Bullion Mountains	243,821	26,555	168,863	0	80.2%
West Mojave and Eastern Slopes	207,301	166	148,446	0	71.7%
Total	1,443,288	97,125	778,059	0	60.6%

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

Impacts to Study Area Lands

Future Assessment Areas. There are no FAAs in this alternative.

Special Analysis Areas. Designation of SAAs as conservation would occur within or adjacent to BLM lands. A portion of the SAA in the Silurian Valley would be within an area that is already protected by BLM due to the wilderness characteristics. Therefore, additional conservation measures in this area would likely be beneficial. Nonetheless, conflicts may occur with existing BLM land use authorizations, plans, and policies. Potential conflicts could be resolved with the mitigation measures discussed under the Preferred Alternative.

DRECP Variance Lands. DRECP Variance Lands represent the BLM Solar PEIS Variance Lands as screened for the DRECP and EIR/EIS based on BLM screening criteria. Covered Activities could be permitted for NCCP purposes only through an NCCP amendment. However, development of renewable energy on Variance Lands would not require a BLM Land Use Plan Amendment so the environmental review process would be somewhat simpler than if the location were left undesignated. In addition, if development of the DRECP Variance Lands occurred on BLM lands, potential conflicts with existing BLM land use auth-

orizations, plans, and policies would be unlikely considering these lands are based on BLM's screening criteria.

Impact Reduction Strategies and Mitigation

Plan implementation would result in conservation of some desert lands as well as the development of renewable energy generation and transmission facilities on other lands. There are several ways in which the impacts of the renewable energy development covered by the Plan would be lessened. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. Also, the implementation of existing laws, orders, regulations and standards would reduce the impacts of project development. If significant impacts would still result after implementation of CMAs and compliance with applicable laws and regulations, then specific mitigation measures are recommended in this section.

Conservation and Management Actions

The conservation strategy for Alternative 4 (see Section II.3.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes definitions of the reserve design and specific CMAs for Alternative 4. CMAs for lands and realty would be the same as under the Preferred Alternative, except for land exchanges and land sales.

Conservation and Management Actions for the Entire Planning Area

- In nondesignated lands (i.e. lands not covered by the specific CMAs), make lands available for disposal through exchange or land sale.

Conservation and Management Actions in Development Focus Areas and DRECP Study Areas

- Make lands within DFAs available for disposal by sale or exchange under Federal Land Policy Management Act Section 203(a)(1), 203(a)(3), 206, and 209.
- In the Plan Area, make lands unavailable for exchange or disposal.

Conservation and Management Actions in National Conservation Lands

- Make available for exchange in accordance with the CMAs outlined for NLCS in Section 5.1.2.1.1.
- Make unavailable for disposal.

Conservation and Management Actions in Areas of Critical Environmental Concern

- Acquire lands through exchange, purchase, or donation.
- Make lands available for disposal through exchange if it results in a net benefit to the values of the ACEC.

Conservation and Management Actions in Wildlife Allocations

- Acquire lands through exchange, purchase, or donation.
- Make lands unavailable for disposal.

Conservation and Management Actions in Special Recreation Management Areas

- Acquire lands through exchange, purchase, or donation.
- Make lands unavailable for disposal.

Laws and Regulations

Similar to the No Action Alternative, existing laws and regulations will reduce certain impacts of Plan implementation. Relevant regulations are presented in the Regulatory Setting in Volume III. The requirements of relevant laws and regulations are summarized for the No Action Alternative in Section IV.13.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, implementation of mitigation measures is required to further reduce identified adverse impacts described for Impacts LR-1 through LR-4. The four mitigation measures defined for the Preferred Alternative would also apply to Alternative 4.

IV.13.3.6.1.2 Impacts from Reserve Design

Impacts to BLM lands and realty from the reserve design are discussed in the impact analysis in LR-4 (Conservation actions could prohibit existing authorized land uses).

IV.13.3.6.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 4

This section addresses two components of effects of the BLM LUPA: the streamlined development of renewable energy and transmission on BLM land under the LUPA and the impacts of the amended land use plans themselves.

IV.13.3.6.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land

The impacts of renewable energy and transmission development on BLM land would be the same as those defined in Section IV.13.3.2.2.1 under the Preferred Alternative.

IV.13.3.6.2.2 Impacts of Changes to BLM Land Designations

The impacts to BLM lands and realty due to changes to BLM land designations would be the same as those defined in Section IV.13.3.2.2.2 under the Preferred Alternative.

IV.13.3.6.3 Impacts of Natural Community Conservation Plan: Alternative 4

As stated in Section IV.13.3.1.3, the California Department of Fish and Wildlife does not have jurisdiction on BLM lands; so there would be no impacts to BLM lands and realty under the NCCP.

IV.13.3.6.4 Impacts of General Conservation Plan

As stated in Section IV.13.3.1.4, the GCP would apply to nonfederal lands in the Plan Area. Therefore, there would be no impacts to BLM lands and realty under GCP.

IV.13.3.6.5 Impacts Outside the Plan Area

IV.13.3.6.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on BLM lands and realty would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.13.3.1.5.2.

IV.13.3.6.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

The potential impacts to BLM lands and realty would be the same under all alternatives. These impacts are as described under the Preferred Alternative in Section IV.13.3.2.5.2, Impacts of BLM LUPA Decisions Outside the Plan Area.

IV.13.3.6.6 Comparison of Alternative 4 With Preferred Alternative

Chapter IV.27 presents a comparison of all action alternatives and the No Action Alternative across all disciplines. This section summarizes the comparison of Alternative 4 with the Preferred Alternative.

IV.13.3.6.6.1 Alternative 4 Compared With Preferred Alternative for Plan-wide DRECP

According to Table II.7-1 in Volume II, Chapter II.7, Alternative 4 would result in a total of approximately 1.6 million acres of land within the DFAs, which would include BLM lands. The Preferred Alternative consists of approximately 2 million acres of land within the DFAs, including BLM lands. Therefore, compared with the Preferred Alternative, the amount designated for renewable energy development in Alternative 4 would 400,000 fewer acres. Under Alternative 4, potential impacts to BLM lands associated with renewable energy development would therefore be fewer than under the Preferred Alternative.

For Alternative 4, Table IV.13-11 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea by type of renewable energy technology. The total is approximately 35,000 acres of impacts from solar, wind, geothermal, and transmission development. Wind energy development consists of over 16,000 acres and would therefore have the greatest potential for impacts, solar would consist of over 11,000 acres, transmission would consist of over 7,000 acres, and geothermal would have the least potential for impacts with 600 acres. For the Preferred Alternative, Table IV.13-3 provides the acreage of potential impacts to BLM ROWs within each ecoregion subarea by type of renewable energy technology. The total is over 39,000 acres of potential impacts from solar, wind, geothermal, and transmission development. Wind would consist of 22,000 acres and would therefore have the greatest potential for impacts, solar would consist of 10,000 acres, transmission development would consist of 6,000 acres, and geothermal development would have the least potential for impact with 800 acres.

Based on a comparison of Table IV.13-11 and Table IV.13-3, the potential for impacts to BLM lands and realty would total approximately 35,000 acres under Alternative 4 and approximately 39,000 acres under the Preferred Alternative. Therefore, the acreage of potential impacts would be greater under the Preferred Alternative.

Under Alternative 4, the vast majority of potential development would occur within the Cadiz Valley and Chocolate Mountains ecoregion subarea. Under the Preferred Alternative, the majority of potential development would be located within the Cadiz Valley and Chocolate Mountains ecoregion subarea. Therefore, under the Preferred Alternative, impacts to BLM lands and realty would be spread over multiple ecoregion subareas, and under Alternative 4, the impacts would be concentrated in one ecoregion subarea.

IV.13.3.6.6.2 Alternative 4 Compared With Preferred Alternative for the BLM Land Use Plan Amendment

The Plan-wide analysis for impacts under Alternative 4 applies to BLM lands and realty only. Therefore, the types of impacts from streamlining renewable energy projects on BLM

land and realty under Alternative 4 would be the same as under the Plan-wide analysis, so the comparison to the Preferred Alternative would also be the same.

Volume II, Section II.3.2, outlines the elements of the BLM LUPA under the Preferred Alternative. As shown in Volume II, Table II.3-19b, the Preferred Alternative consists of approximately 367,000 acres of BLM-administered land within the DFAs and approximately 8.2 million acres of BLM lands within the Reserve Design Lands. Under Alternative 4, as shown in Table II.7-5b, there would be approximately 258,000 acres of potential DFAs under the BLM LUPA, and approximately 7.7 million acres within the Reserve Design Lands. Therefore, potential impacts to BLM land use authorizations would be greater under the Preferred Alternative than under Alternative 4.

IV.13.3.6.6.3 Alternative 4 Compared With Preferred Alternative for NCCP

The NCCP would apply to all lands within the Plan Area; however, the California Department of Fish and Wildlife does not have jurisdiction on BLM lands. Therefore, as with the Preferred Alternative, there would be no impacts to BLM lands and realty under the NCCP for Alternative 4.

IV.13.3.6.6.4 Alternative 4 Compared With Preferred Alternative for the GCP

The GCP would apply to nonfederal lands in the Plan Area. Therefore, as with the Preferred Alternative, there would be no impacts to BLM lands and realty under the GCP for Alternative 4.