

IV.11 LAND USE AND POLICIES

This chapter addresses potential land use impacts and conflicts with applicable adopted county plans that would occur from implementing renewable energy and transmission development under the Desert Renewable Energy Conservation Plan (DRECP or Plan). This chapter examines the impact for the No Action Alternative and the five action alternatives: Preferred Alternative and Alternatives 1 through 4. Appendix R2.11 includes tables supporting this chapter. The tables present land use acreage by county for each alternative and acreage for Development Focus Areas (DFAs), Existing Conservation, and Conservation Planning Areas (CPAs).

Several resource chapters of this Environmental Impact Report/Environmental Impact Statement (EIR/EIS) address impacts on specific types of land use and impacts on lands. Chapters addressing impacts on land use at and adjacent to renewable energy projects, in both the short-term and long-term, are:

- IV.2 Air Quality
- IV.4 Soils and Geology
- IV.5 Flood Hazard, Hydrology, and Drainage
- IV.7 Biological Resources
- IV.9 Native American Interests
- IV.12 Agricultural Land and Production
- IV.13 Bureau of Land Management Lands and Realty
- IV.14 Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics
- IV.15 Mineral Resources
- IV.16 Livestock Grazing
- IV.18 Outdoor Recreation
- IV.19 Transportation
- IV.20 Visual Resources
- IV.21 Noise and Vibration
- IV.23 Socioeconomics and Environmental Justice
- IV.24 Department of Defense Lands and Operations

Discussions and analyses of impacts on specific land uses in those chapters are not repeated here. The primary focus in this chapter is on the extent to which projects under the DRECP could conflict with existing land uses and land use plans and policies applicable in the proposed DFAs and CPAs.

IV.11.1 Approach to Impact Analysis

The discussion of land use impacts for the No Action Alternative, Preferred Alternative, and Alternatives 1 through 4 is based on county boundaries rather than ecoregions. This is because land use planning and decision-making occur based on administrative jurisdiction. This allows for a clearer presentation of the potential land use conflicts on nonfederal lands for each of the seven counties within the Plan Area.

IV.11.1.1 General Methods

The analysis of impacts on land use for each alternative is based on the description of Covered Activities on federal and nonfederal lands and the overall conservation strategy within the Plan Area. Covered Activities are those associated with renewable energy development that would be allowed within DFAs. Transmission development also may occur outside the DFAs but would not be subject to permitting and management conditions set by the Plan.

Typical solar, wind, and geothermal energy development and associated transmission line right-of-way (ROW) requirements can have direct effects on land use. Projects can also have indirect effects not immediately related to the project but that result from the project. Indirect impacts may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate and related effects on air and water and other natural systems, including ecosystems. Short-term impacts would be those that occur for only a short period during and after the proposed actions (e.g., nuisance impacts such as construction noise and dust during development). Long-term impacts are those that occur for an extended period and include the conversion of existing land uses to a different use and the preclusion of alternative future uses of a location.

The DRECP would result in future renewable energy development applications within identified DFAs. Each project would undergo subsequent individual National Environmental Policy Act and/or California Environmental Quality Act (CEQA) analysis for project-specific impacts. Impacts related to renewable energy projects and associated facilities would vary, depending on the technology proposed, the specific location of the project, the timing and degree of disturbance, and the size and complexity of constructed facilities and land alterations.

In the Plan Area, jurisdiction over a project generally is determined by the renewable technology proposed and whether the project is sited on federal or nonfederal land. On BLM

land, BLM has jurisdiction regardless of the technology. On lands not under federal or state control, local government has jurisdiction over projects using wind and photovoltaic solar technologies. Thermal solar and geothermal renewable energy projects with over 50 megawatts of output on nonfederal lands fall under the jurisdiction of the California Energy Commission. The California State Lands Commission has jurisdiction over state school lands, reserved mineral interests, and sovereign lands.

The Plan Area includes a portion of seven counties (Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino, and San Diego) and 21 cities. Across the Plan Area, an estimated 97% of the area in the seven counties is unincorporated. Based on land use information provided for each county, a range of existing and planned land uses occurs within the Plan Area, including: agriculture, residential (includes mixed use, rural and specific plan/community development designations), commercial, industrial, open space, and other (e.g., road right-of-way [ROWS]). Volume III, Chapter III.11, discusses the regulatory setting, planning documents, and existing land uses in the counties; and Appendix R2 includes tables with the land use acreages referenced throughout this impact analysis.

Potential land use conflicts may result from the development of utility-scale renewable energy facilities within the proposed DFAs and from the designation of new CPAs and recreation lands. Potential impacts can be physical incompatibilities with existing or authorized land uses or inconsistencies with applicable land use plans, policies, or regulations.

This chapter discusses the potential impacts to land uses resulting from the No Action Alternative, the Preferred Alternative, and Alternatives 1 through 4. In particular, the analysis discusses and compares the amount and type of land that would be affected by development or conservation under each alternative. Because this is a programmatic impact analysis, it is based on the potential types of impacts associated with renewable energy development generally rather than on a specific project. The impacts are neither site- nor project-specific.

IV.11.1.2 CEQA Standards of Significance

Appendix G of the CEQA Guidelines provides various questions to consider when evaluating what constitutes an impact and its level of significance. These are not obligatory analysis parameters, and lead agencies may modify them and/or develop their own set of criteria when preparing EIR analyses. However, most jurisdictions use guidelines that closely track the Appendix G CEQA Guidelines Environmental Checklist Form. Under Appendix G, a project would result in a land use and planning impact if it would:

1. Physically divide an established community.
2. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including the general plan, specific plan, local coastal

program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

3. Conflict with any applicable Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).

Each of these items is addressed in the following paragraphs.

Physically divide an established community. For the reasons discussed in the following paragraphs, the development of renewable energy projects and transmission lines in the Plan Area would not result in the division of an established community because a new corridor will not be needed to implement the Plan. Therefore, this topic is not addressed further in this analysis.

Projects that physically divide an established community typically consist of major linear projects (e.g., freeways, railroads, transit, or aboveground aqueducts) that separate one part of a community from another and limit interactions between the separated areas. Transmission lines require linear corridors that, depending upon location and the need for a new corridor, could separate an established community. However, a transmission line ROW consists of poles or towers typically spaced 125 feet apart with open land between. This does not result in a physical barrier between adjacent land uses. Local roads need not be truncated, and visual and physical barriers would not be put into place for the length of the corridor. Often, compatible land uses—such as parks, nurseries, and parking—are allowed within and adjacent to transmission line (ROWs). In addition, as noted in Volume III, Section III.11.8.1.1, Transmission Lines, most new transmission lines associated with the Plan are expected to be placed in existing transmission corridors; no new transmission corridors are anticipated.

Large renewable energy projects occupy continuous tracts of land, not long corridors. As with any large single-purpose facility (e.g., a shopping mall, a military base, a regional park, or large industrial assembly plant), access through the property is limited or unavailable. However, because utility-scale renewable energy projects would be on tracts of open land, they are not likely to divide an established community.

Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Specific renewable energy project conflicts with any applicable land use plan, policy, or regulation of an agency having jurisdiction over the project cannot be identified at the programmatic level. A variety of land use designations apply to lands in DFAs. Without proposals for renewable energy development projects using specific technologies on specific tracts, it is not feasible (and would be speculative) to identify potential conflicts between the projects and the underlying land use designations and applicable

plans and policies. Plans, policies, and regulations identify land uses and activities that are permitted by right; permitted with approvals, permits, and conditions; or not permitted. With regard to consistency with plans, policies, and regulations, a project can be only one of two things:

- Consistent, or able to be made consistent through mechanisms such as conditional or major use permits, plan amendments, and mitigation measures that harmonize it with the jurisdiction's overall planning goals and objectives; or
- Not consistent.

Theoretically, a list of renewable energy project types of various sizes and characteristics could be developed and compared with each jurisdiction's plans, policies, and regulations to determine general consistency. Project types could be determined to be consistent in some locations and not in others based on existing land use designations and the applicable standards for that designation. When it is unclear whether a project would be consistent, or if it is not consistent, land use authorities (i.e., local agency planning departments and commissions) would need to interpret the situation in light of precedents and various (sometimes competing) local goals and objectives. They would need to determine whether certain project changes would make it consistent or whether the jurisdiction would need to, and be willing to, amend its plans, policies, and regulations to bring the project into consistency. General Plan amendments, zoning changes, and zoning ordinance revisions may be required in the respective counties to resolve issues of potential land use inconsistency and incompatibility.

Depending upon existing land use designations, development of renewable energy projects may be deemed consistent in some portions of DFAs but not in others. If inconsistent, authorities would determine whether projects, plans, and policies could be revised and amended to overcome inconsistencies. To address the potential for inconsistencies, each renewable energy developer will be required to determine how its project relates to established local agency policies at the time of a specific application. This will provide a project-specific assessment of applicable local agency policies and ordinance requirements and some measure of assurance that local agency policies and ordinance requirements are considered before a decision is made. With the addition of this mitigation measure, the potential for local agency policy or plan inconsistencies will be less than significant.

Conflict with any applicable HCP or NCCP. With regard to the third CEQA Appendix G item, an NCCP and HCP (in this case a GCP) are components of the DRECP action alternatives. The land use and planning impacts associated with the proposed conservation actions are analyzed in Section IV.11.3, Impact Analysis by Alternative.

IV.11.2 Typical Impacts Common to All Action Alternatives

This section describes the types of land use impacts that may occur with development of renewable energy projects allowed under the DRECP. A discussion of the DRECP's consistency with adopted plans and policies for conservation on both federal and nonfederal lands is included as well.

The juxtaposition of renewable energy facilities with existing or planned land uses in DFAs could introduce incompatibilities such as the permanent conversion of lands from their existing use (e.g., agriculture or recreation) to an industrial-type use.

Under the Plan, projects on private land would be reviewed by the appropriate jurisdiction for consistency with approved, permitted, and adopted land plans, ordinances, and other relevant planning documents, including NCCPs and HCPs. On private land, where an adopted NCCP or HCP already is in place, the mitigation for impacts would conform to that adopted NCCP or HCP. On BLM lands, the existing plans and policies (under the No Action Alternative) or the proposed new land designations and conservation management strategies (under the Preferred Alternative and Alternatives 1 through 4) would apply.

On both federal and nonfederal lands, the impacts of individual renewable energy projects would be assessed during the permitting process and in project-level CEQA and National Environmental Policy Act documents specific to the proposed project and site. Future projects developed pursuant to Plan approval would be reviewed on a case-by-case basis to determine if they would be consistent with adopted land use plans.

IV.11.2.1 Impacts of Renewable Energy and Transmission Development

This section describes land use impacts typically associated with the various renewable energy technologies that would be permitted under the DRECP (i.e., solar, wind, and geothermal energy systems and transmission infrastructure).

Most large-scale renewable energy projects would be primarily on open, undeveloped tracts of land. Typical land use impacts associated with development of renewable energy and transmission facilities include the following:

- Short-term land use impacts during preconstruction and construction activities from increased noise and emissions, effects on aesthetics, or exposure to hazards or hazardous materials.
- Long-term impacts during ongoing operations and maintenance activities from the conversion of existing land uses or the preclusion of planned land uses.

There would be variation in land use impacts depending upon the type of renewable energy technology used. The following discussion focuses on the land use impacts that would be specific to each technology.

Solar and Geothermal. Large solar and geothermal energy generation projects would be located on open, undeveloped land. Comparably rated power tower, dish engine, and photovoltaic technologies require about 80% more land area than solar parabolic trough technologies with similar output. Solar energy development would permanent convert existing land uses to renewable energy use and may preclude alternative uses on the land they occupy. In certain cases, solar photovoltaic projects can allow agricultural and grazing activities and provide wildlife corridors.

Large geothermal projects may also require extensive areas for development. However, in some cases, projects may include directional drilling to access geothermal resources from adjacent properties. In addition, projects can include multiple wells in each well pad, which limits the area of disturbance (surface footprint).

Wind. Utility-scale wind energy developments preclude certain types of land uses but allow for other land uses to continue. While incompatible with most residential and commercial uses, wind projects could be compatible with agriculture and recreation.

Transmission. Adopted land use plans and policies may affect the location of ROWs for transmission lines serving renewable energy facilities. In most cases, it is likely that transmission line ROWs could be located to avoid sensitive existing land uses and comply with adopted plans and policies.

IV.11.2.1.1 Impacts of Site Characterization

Site characterization activities for individual projects may include construction of temporary access roads, erection of meteorological towers, geotechnical borings, and other activities associated with site reconnaissance, including follow-up reclamation and recontouring. Activities during the site characterization phase could result in temporary land use impacts that create nuisances, disrupt existing land uses, or conflict with applicable policies or regulations.

IV.11.2.1.2 Impacts of Construction and Decommissioning

Activities associated with construction of individual projects include ground-disturbing activities (vegetation clearing, grading, and excavation), establishment of staging areas, and installation of temporary fencing and drainage. Construction activities also include the movement of personnel, vehicles, equipment, and materials to, from, and within project sites. Project decommissioning activities include removal of project infrastructure

and restoration and revegetation of the land. These activities would be temporary, but they would have the potential to disrupt existing land uses or conflict with applicable policies or regulations.

IV.11.2.1.3 Impacts of Operations and Maintenance

Activities associated with the operation and maintenance of individual projects include facility operation, maintenance, repair, replacement of project components, dust suppression, and fire and fuel management. Development of generation facilities would require the long-term use of tracts of land, which would convert land from existing uses and potentially disrupt or degrade adjacent land uses. Operation and maintenance activities would be ongoing, with the potential to disrupt existing land uses or conflict with applicable plans and policies.

IV.11.2.2 Impacts of the Reserve Design

The conservation of lands within the reserve design and the implementation of Conservation and Management Actions (CMAs) would limit disturbances. CMAs would establish standard practices for activities such as siting and design, use of existing roads and utility corridors, and restoration. However, lands throughout the Plan Area are subject to plans, policies, and designations that may conflict with the reserve design and CMAs. For example, local land use designations may include zoning standards or specific area plans that allow for residential or commercial development and not anticipate the absence of development through conservation. Conservation actions could preclude or limit existing authorized or planned land uses. Under the reserve design, conservation on specific private lands is not mandatory but would occur only where willing sellers make the land available. Supplemental, project-specific analysis would be needed to identify the specific impacts on land use plans and policies from the reserve design components.

IV.11.2.3 Impacts of BLM Land Use Plan Decisions

IV.11.2.3.1 Impacts of Renewable Energy Development and Transmission on BLM Lands

The typical impacts from the various renewable energy and transmission technologies would be the same as those described in Section IV.11.2.1, Impacts of Renewable Energy and Transmission Development. However, the specific locations where energy and transmission development would be allowed would be driven by Land Use Plan Amendment (LUPA) decisions, which encourage or restrict development in some areas. Analysis of BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

IV.11.2.3.2 Impacts of BLM Land Designations and Management Actions

Because BLM LUPA land designations would be managed to protect ecological, historic, cultural, scenic, scientific, and recreation resources and values, the use of or access to some existing and planned land uses likely would be restricted. While some land uses are allowed within these areas, they must be compatible with the resources and values the particular land designation is intended to protect.

Designations of Areas of Critical Environmental Concern, National Landscape Conservation System lands, and wildlife allocations would limit land uses or result in the conversion of existing land uses to the designated use. Caps on the amount of disturbance allowed in conserved and protected areas protect the resource values present.

Special Recreation Management Area designations may increase accessibility to remote land uses, potentially leading to looting or vandalism at existing land uses.

Details on allowable uses and management within National Landscape Conservation System lands are presented in the proposed LUPA description in Volume II. Details on the goals, objectives, allowable uses, and management actions for each Area of Critical Environmental Concern and Special Recreation Management Area unit are presented in the LUPA worksheets in Appendix H.

IV.11.2.4 Impacts of Natural Community Conservation Plan and General Conservation Plan

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

IV.11.2.4.1 Natural Community Conservation Plan

The impacts of renewable energy development permitted under the NCCP would be the same as those defined for the Plan-wide impacts, including the typical impacts described in Section IV.11.2, Typical Impacts Common to All Action Alternatives, and for each alternative described in this chapter.

IV.11.2.4.2 General Conservation Plan

The types of impacts resulting from renewable energy development permitted under the GCP would be the same as those defined for the Plan-wide impacts, including the typical impacts described in Section IV.11.2. However, the locations where these impacts would occur would vary by alternative. Any differences in these impacts that result from the locational differences are described for each alternative.

IV.11.3 Impact Analysis by Alternative

The following sections present impact analyses for the No Action Alternative, the Preferred Alternative, and Alternatives 1 through 4. Potential impacts are presented by county based on the tables provided in Appendix R2, which provide land acreages by jurisdiction. To facilitate the comparison of alternatives, two tables have been prepared to summarize the information presented in Appendix R2. Table IV.11-1 presents the DFA acreage identified Plan-wide and in the GCP by alternative and for each county. Table IV.11-2 presents the acreage by county of the identified CPAs from the GCP. The CPAs would only become “conservation areas” if the agencies are able to assemble land from willing sellers in the designated areas.

**Table IV.11-1
Potential Acres of Plan-wide and GCP DFAs**

County	No Action	Preferred Alternative	Alternative 1	Alternative 2	Alternative 3	Alternative 4
<i>Plan-wide Available Development Area (No Action)¹ and DFAs (Other Alternatives)²</i>						
Imperial	1,065,000	733,000	442,000	844,000	498,000	447,000
Inyo	250,000	45,000	22,000	68,000	24,000	35,000
Kern	929,000	360,000	122,000	478,000	225,000	308,000
Los Angeles	528,000	218,000	112,000	225,000	159,000	218,000
Riverside	995,000	268,000	99,000	268,000	133,000	259,000
San Bernardino	2,468,000	399,000	274,000	591,000	366,000	342,000
San Diego	57,000	0	0	0	0	0
Total	6,291,000	2,024,000	1,070,000	2,472,000	1,405,000	1,608,000
<i>GCP Available Development Area (No Action) and GCP DFAs (Other Alternatives)³</i>						
Imperial	712,000	602,000	379,000	610,000	383,000	381,000
Inyo	45,000	19,000	10,000	33,000	11,000	20,000
Kern	720,000	333,000	119,000	361,000	208,000	288,000
Los Angeles	522,000	218,000	112,000	224,000	159,000	218,000
Riverside	260,000	96,000	87,000	96,000	96,000	96,000
San Bernardino	1,115,000	364,000	265,000	405,000	318,000	329,000
San Diego	57,000	0	0	0	0	0
Total	3,432,000	1,632,000	971,000	1,730,000	1,175,000	1,332,000

¹ The available development area includes all available acreage without consideration of land constraints or other issues. Refer to Table IV.11-1 for the permanent disturbance area for all alternatives.

² The Plan-wide DFA acreage includes land acreage for both federal and nonfederal lands.

³ The GCP applies to nonfederal lands. Therefore, the listed values are the acreage amounts for lands managed by state and local agencies as well as lands under private ownership. For the No Action Alternative, the federal land acreage has been subtracted from the Available Development Area acreage.

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. Refer to Appendix R2 Land Use and Policies tables for more detail.

**Table IV.11-2
Potential Acres of GCP1 Conservation Planning Areas²**

County	No Action	Preferred Alternative	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Imperial	Conservation Areas would be identified on a project-by-project basis	20,000	21,000	20,000	19,000	22,000
Inyo		35,000	39,000	42,000	34,000	34,000
Kern		85,000	105,000	91,000	96,000	88,000
Los Angeles		58,000	56,000	56,000	63,000	58,000
Riverside		15,000	12,000	18,000	11,000	20,000
San Bernardino		98,000	104,000	148,000	104,000	105,000
San Diego		1,000	1,000	1,000	1,000	1,000
Total		312,000	338,000	375,000	330,000	328,000

¹ The GCP applies to nonfederal lands. Therefore, the acreage includes lands managed by state and local agencies as well as lands in private ownership. This table presents a subset of the total Conservation Planning Areas that applies a conservation percentage. This is an indication of the amount of conservation that could be expected in the Conservation Planning Areas if willing sellers are found. The total Conservation Planning Areas, including the private land breakout, are presented in Table II.3-4 for the Preferred Alternative Table II.4-3 for Alternative 1, Table II.5-3 for Alternative 2, Table II.6-3 for Alternative 3, and Table II.7-3 for Alternative 4. Conservation Planning Areas with the conservation percentage applied under county jurisdiction only are listed in Appendix Table R2.11-3 for the Preferred, Table R2.11-5 for Alternative 1, Table R2.11-7 for Alternative 2, Table R2.11-9 for Alternative 3, and Table R2.11-11 for Alternative 4.

² The Conservation Planning Areas are defined in this plan as “the portion of the DRECP Plan-wide Reserve Design Envelope that falls outside of Existing Conservation Areas and BLM LUPA Conservation Designations. CPAs include, but are not limited to, all nonfederal lands within the Interagency Plan-wide Conservation Priority Areas. A portion of the DRECP Conservation Area will be assembled by acquiring land or conservation easements from willing sellers in the Conservation Planning Areas..”

³ **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. Refer to Appendix R2 Land Use and Policies tables for more detail.

IV.11.3.1 No Action Alternative

Under the No Action Alternative, the DRECP would not be implemented; and it is assumed that renewable energy and transmission development projects, and mitigation for these projects, would occur on a project-by-project basis. Those projects would conform to the applicable land use plan, policies, and regulations of the authorizing jurisdiction, consistent with past and ongoing renewable energy and transmission projects. Under the No Action Alternative, there would be no DFAs and CPAs. The No Action Alternative would not provide a regionwide plan to direct the development of future facilities in appropriate locations

based on resource value and site conditions. The renewable energy development and conservation assumptions associated with the No Action Alternative are described in Volume II.

The discussions in the following sections describe the impacts from future renewable energy development and conservation under the No Action Alternative, relative to the baseline conditions presented in Volume III, Chapter III.11, Affected Environment.

IV.11.3.1.1 Impacts Within the Entire Plan Area in No Action Alternative

Under the No Action Alternative, California's renewable energy goals would be achieved without the DRECP; and up to 20,000 megawatts of renewable energy, transmission development, and mitigation for projects in the Plan Area would occur on a project-by-project basis in a pattern consistent with those of past and ongoing renewable energy and transmission projects.

IV.11.3.1.1.1 Impacts and Mitigation for Renewable Energy and Transmission Development in No Action Alternative

Impact Assessment

Impact LU-1: Plan components would conflict with existing and planned land uses and related plans and policies.

Depending upon the technology used and the project location, renewable energy development and associated electric transmission could conflict with existing and planned land uses within several counties. Plan-wide, the majority of undeveloped lands (including BLM lands) could be available for renewable energy and associated transmission development. Under the No Action Alternative, development would primarily occur in Imperial, Kern, San Bernardino, and Riverside counties. Table IV.11-1 presents the available development acreage under the No Action Alternative (see Appendix R2 Land Use and Policies for a detailed breakdown). The table identifies approximately 6 million acres as available land for renewable energy development under the No Action Alternative. This value does not take into consideration land constraints or other environmental issues that would limit future development under this alternative. The information does show, however, that San Bernardino County and Imperial County have the largest amounts of potential land for renewable energy development with San Diego County potentially having the least amount of available land. The following is a summary of the potential land use impacts for each county within the Plan Area:

- In Imperial County, the majority of lands within Available Development Areas are BLM lands and county lands under agricultural designations. Solar and wind development would be the main types of development.

- In Inyo County, the vast majority of development would be solar energy generation on BLM lands.
- In Kern County, the majority of the lands within Available Development Areas are county lands under agricultural, residential, and open space designations. The vast majority of development in Kern County would consist of wind energy generation.
- In Los Angeles County, the majority of the designated lands within Available Development Areas are county lands under residential land designations. The majority of development in Los Angeles County would consist of solar energy generation and the associated transmission lines.
- In Riverside County, the vast majority of development would be solar energy generation on BLM lands.
- In San Bernardino County, the majority of the lands within Available Development Areas are BLM lands and county lands under residential and open space designations. The majority of development in San Bernardino County would be solar energy generation and the associated transmission lines.
- In San Diego County, the majority of the lands in Available Development Areas are county lands under residential and open space designations. The majority of development in San Diego County would be wind and solar energy generation.

Land use conflicts from renewable energy development would occur from short-term construction-related disturbances. During preconstruction and construction activities, impacts to existing land uses either on or adjacent to a project site could include increased noise levels, dust, and emissions from construction equipment; degradation of scenic resources due to the presence of construction activities or equipment; and exposure to hazards or hazardous materials. Detailed discussion of the potential short-term impacts on land use resulting from DRECP implementation are addressed in Chapters IV.2, Air Quality; IV.19, Transportation and Public Access; IV.20, Visual Resources; and IV.21, Noise and Vibration.

Long-term operational effects from each of the renewable technologies and the associated transmission lines include the conversion of existing land uses on a project site to new uses or the preclusion of planned land uses. Renewable energy development projects typically require large tracts of land; therefore, it is unlikely that energy facilities would be located at sites with existing built land uses, such as in medium- to high-density residential and commercial areas. With the exception of transmission lines, renewable energy development tends to occur in rural areas, which would result in the conversion of rural land uses, namely agriculture, recreation, and open space. Much of the available development area under the No Action Alternative is either on lands designated by local jurisdictions for agri-

cultural and open space use or on BLM land with management designations allowing for such uses as grazing, recreation, and conservation. Analysis of potential impacts to rural land uses is provided in Chapters IV.12, Agricultural Land and Production; IV.13, Bureau of Land Management Lands and Realty; IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics; IV.16, Live-stock Grazing; and IV.18, Outdoor Recreation.

Over the long-term, siting of renewable energy projects could preclude the development of or continuation of land uses that are a part of a long-term plan, which could result in inconsistencies with adopted plans, policies, designations, or regulations. For instance, local and regional plans may earmark various rural areas for a particular mix of future land uses; but development of a renewable energy project could interfere with or prevent achieving the planned land use pattern.

Transmission lines are developed as linear corridors that traverse many types of land uses, including urban areas with high-density residential and commercial land uses. The development of transmission lines typically results in short-term impacts to nearby land uses during construction. These types of impacts, reviewed here, are discussed in detail in Chapters IV.2, Air Quality; IV.19, Transportation and Public Access; IV.20, Visual Resources; and IV.21 Noise and Vibration. Long-term impacts from transmission lines, such as the conversion of land, would be minimal because transmission poles or towers require a negligible amount of land, are minimally disruptive of adjacent land uses, and generally allow for existing land uses in the ROW to continue.

Solar Energy Zones (SEZs) were established as part of the Final Solar Programmatic EIS (PEIS). SEZs were identified by BLM as areas well suited for utility-scale solar energy production. Within the Plan Area there are two SEZs—Riverside East and Imperial East. The east boundary of the Riverside East SEZ is in the Chuckwalla Valley in Riverside County, approximately 6 miles west of the Arizona border. The developable area of the Riverside East SEZ is 147,910 acres. The Imperial East SEZ is in Imperial County near the U.S.–Mexico border. The developable area of the Imperial East SEZ is 5,717 acres (BLM 2012). As shown in Table II.2-1 (Volume II, Chapter II.2), under the No Action Alternative the Solar PEIS also includes approximately 583,000 acres of Variance Lands, which allow utility-scale renewable energy development outside of SEZs in accordance with the proposed variance process. Renewable energy development within the designated SEZs and Variance Lands would minimize potential land use conflicts with existing BLM land uses and designations.

Laws and Regulations

Public agencies and bodies adopt plans and policies to manage and protect the resources and lands over which they have jurisdiction. Plans, policies, and regulations can have bene-

ficial effects that would not otherwise occur. Existing laws and regulations would reduce the impacts of renewable energy development projects that otherwise could occur in the absence of the DRECP. Relevant regulations are presented in the Regulatory Setting in Volume III. (Note, because this EIR/EIS addresses amendments to BLM land use plans, those plans are addressed separately. Analyses of BLM LUPA impacts on land use are presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.)

Relevant laws, regulations, standards and policies would reduce potential impacts through application of the following:

- Federal planning and guidance documents from BLM, Bureau of Reclamation, Department of Defense, National Park Service, and U.S. Fish and Wildlife Service.
- State planning and guidance documents for California State Parks and state-designated recreation areas as well as California State Lands Commission statutes and guidance for administration of school lands, minerals, geothermal resources, and sovereign lands.
- Regional and county planning and guidance documents, including General Plan elements, zoning regulations, and renewable energy ordinances.

Mitigation

Mitigation measures adopted for previously approved renewable energy and transmission projects likely would be applied to these types of projects in the future under the No Action Alternative. Because impacts created by projects (e.g., air quality, noise, and traffic) could affect adjacent land uses, mitigation measures identified for other resources (such as agriculture, air quality, noise and vibration, visual resources, transportation, public safety, and soils and geology) would be applicable to land use compatibility and policy consistency generally. These would reduce, minimize, or avoid land use effects. Examples include establishing buffers between land uses, visual screening, noise and dust reduction measures, and compensation for taking agricultural land out of production.

IV.11.3.1.1.2 Impacts from Reserve Design in the No Action Alternative

The No Action Alternative has no reserve design. Even without approval of the DRECP, there would be protection of existing Legislatively and Legally Protected Areas such as parks, preserves, and wilderness areas through existing laws, regulations, and plans.

The Plan Area includes more than 7 million acres of federal and nonfederal existing protected areas (Legislatively and Legally Protected Areas and Military Expansion Mitigation Lands).

Of the total protected areas, approximately 412,000 acres are nonfederal lands. The following list provides the approximate acreage of these nonfederal protected areas by county:

- Imperial County – 73,000 acres
- Inyo County – 7,000 acres
- Kern County – 50,000 acres
- Los Angeles County – 5,000 acres
- Riverside County – 2,000 acres
- San Bernardino County – 86,000 acres
- San Diego County – 189,000 acres

Under the No Action Alternative, existing protected areas (and existing BLM Conservation Designations on federal land) would provide ongoing conservation and protection. However, there would be no reserve design to guide where BLM Conservation Designations should be established in the future, or where reserves should be assembled to offset the effects of renewable energy or transmission development. Specifically, under the No Action Alternative, no CPAs would be created. Each reviewing agency would identify potential conservation lands on a project-by-project basis and as part of a condition of approval on a specific project. As such, the locations of any conservation areas resulting from conditions applied to renewable energy or transmission development would not be systematically determined by state and federal agencies and would be based solely on the requirements imposed on a project-by-project basis.

IV.11.3.1.2 Impacts on BLM Lands of Existing BLM Land Use Plans in No Action Alternative

Under the No Action Alternative, land use impacts to BLM lands would be the same as the impacts discussed in Section IV.11.3.1.1.1, Impacts and Mitigation for Renewable Energy and Transmission Development in No Action Alternative. The BLM's administration of its lands would continue to follow existing land use plans, policies, and regulations. Potential conflicts between land uses with renewable energy and transmission development projects would be considered and resolved on a case-by-case basis consistent with the existing land use plan. Analyses of BLM LUPA impacts on land use are presented in Chapters IV.13, Bureau of Land Management Lands and Realty; and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

The existing BLM Land Use Plan Conservation Designations would provide ongoing protection and conservation. Additional conservation could occur because of renewable energy or transmission development, depending upon the requirements imposed during individual project decisions.

IV.11.3.1.3 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 DRECP implementation, the NCCP would not be approved; and, therefore, no incidental take permits would be issued under the NCCP. Projects would continue to be considered by the appropriate lead agency on an individual basis. The impacts that would occur in the absence of the NCCP would be the same as those described in Section IV.11.3.1.1.1 (Plan-wide analysis).

IV.11.3.1.4 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. Without DRECP implementation, the GCP would not be approved; and no incidental take permits would be issued under the GCP. Projects would continue to be considered by the appropriate lead agency on an individual basis. The impacts that would occur in the absence of the GCP would be the same as those described in Section IV.11.3.1.1.1 (Plan-wide analysis) but would be specific to nonfederal lands.

IV.11.3.1.5 Impacts Outside the Plan Area in No Action Alternative

IV.11.3.1.5.1 Impacts of Transmission Outside the Plan Area

Additional transmission lines would be required to deliver renewable energy to load centers (areas of high demand) outside the Plan Area. It is assumed that new transmission lines outside the Plan Area would use existing transmission corridors between the Plan Area and existing substations in the more heavily populated areas of the state. Transmission line development occurs within linear corridors that traverse many types of land uses, including urban areas with high-density residential and commercial land uses. New transmission lines might be constructed outside the Plan Area in the San Diego, Los Angeles, North Palm Springs–Riverside, and Central Valley areas. These areas and corridors are described in Volume III, Section III.11.8, Transmission Out of Plan Area].

Impact LU-1: Plan components would conflict with existing and planned land uses and related plans and policies.

Short-term land use conflicts from transmission line development outside the Plan Area would occur from construction-related disturbances. During preconstruction and construction activities, impacts to existing land uses in or adjacent to a transmission line project ROW could result from increased noise levels, dust, and emissions from construction equipment; degradation of scenic resources due to the presence of construction activities or equipment; and exposure to hazards or hazardous materials. Detailed discussions of potential impacts resulting from transmission line development outside the Plan Area are

included in Chapters IV.2, Air Quality; IV.19, Transportation and Public Access; IV.20, Visual Resources; IV.21, Noise and Vibration; and IV.22, Public Safety and Services.

Long-term operational effects from transmission lines could include converting existing land uses to transmission uses and precluding otherwise planned land uses. Long-term impacts, such as the conversion of land, would be minimal because transmission poles and towers require negligible amounts of land; and existing compatible land uses often are allowed to continue in ROWs.

Transmission corridors outside the Plan Area are anticipated to be in the same ROWs as existing high-voltage transmission lines or adjacent to or near these existing lines. In areas that are not built up, such as in National Forest System lands or in the Central Valley, transmission lines would not preclude most existing uses and would be a compatible use given the proximity of existing lines. In urban areas, existing corridors are well-defined ROWs, typically with buildings and roads adjacent to the ROW. New lines in an existing ROW would be a compatible use.

On federal lands (e.g., National Forest System land and BLM-administered land), the agencies having jurisdiction would conduct project-specific application reviews. They would determine whether there is a conflict with existing or planned land uses or use designations (e.g., Forest Land Management Plans or BLM Resource Management Plans). On lands under local jurisdiction, including individual counties and municipalities, the jurisdiction would need to consider whether a proposed project is consistent with applicable plans, policies, and regulations or could be made consistent.

IV.11.3.1.5.2 Impacts of Existing BLM Land Use Plans Outside the Plan Area

Under the No Action Alternative, the existing BLM California Desert Conservation Area land use plan would continue to be implemented; and renewable energy projects would be developed through BLM's existing policies. Impacts on existing and planned land uses would be of the types described in Section IV.11.2.1, with similar mitigation measures being included on a case-by-case basis.

Existing land designations—such as protected areas, Areas of Critical Environmental Concern, and National Scenic and Historic Trails—would continue to be managed to protect their associated values and resources.

IV.11.3.1.6 CEQA Significance Determination: No Action Alternative

Impact LU-1: Plan components would conflict with existing and planned land uses and related plans and policies.

The No Action Alternative for the DRECP would result in no change from the current practices and means used by local agencies for determining and addressing land use conflicts. Counties would continue to consider projects using existing review and approval mechanisms and regulatory standards. Determinations would continue to be made as to whether projects would create land use conflicts and whether and how those conflicts can be resolved using applicable existing procedures and standards. In addition, during project-specific application reviews, methods and measures identified to mitigate impacts from existing approved projects, or new mitigation measures and conditions of approval, would be developed and applied to projects. As a result, the No Action Alternative would result in a less than significant impact.

IV.11.3.2 Preferred Alternative

IV.11.3.2.1 Plan-wide Impacts of Implementing the DRECP: Preferred Alternative

Under the Preferred Alternative, renewable energy activities covered by the Plan would be confined to DFAs and would result in an estimated 2 million acres of potential disturbance with approximately 1,632,00 acres of the total DFAs on nonfederal lands (see Table IV.11-1). This amount includes all potential lands without consideration of land use constraints. However, the estimated permanent disturbance area is approximately 145,000 acres (see Table IV.1-1). Land use impacts from renewable energy development within the DFAs would occur from construction-related and operational effects of each of the technologies and associated electric transmission facilities.

The Plan-wide distribution of land under federal, state, and local control for the Preferred Alternative that would fall within DFAs is provided in Appendix R2, Table R2.11-2. Based on adopted General Plans, Table R2.11-2 depicts the acreages of land use designations within each county, Plan-wide. Analyses of impacts on land uses outside of county jurisdictions are presented in Chapters IV.9, Native American Interests; IV.12, Agricultural Land and Production; IV.13, Bureau of Land Management Lands and Realty; IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics; IV.16, Livestock Grazing; IV.18, Outdoor Recreation; and IV.24, Department of Defense Lands and Operations.

IV.11.3.2.1.1 Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development

Impact Assessment

Impact LU-1: Plan components would conflict with existing and planned land uses and related plans and policies.

Renewable energy generation under the Preferred Alternative would generally be concentrated on designated lands in Imperial, Kern, Los Angeles, Riverside and San Bernardino counties. Solar and wind are the major forms of renewable energy generation in Riverside and San Bernardino counties. The majority of renewable energy development in Imperial County would consist of solar generation. Wind generation would be the most prevalent form in Kern County. Geothermal generation is proposed only in Imperial and Inyo counties under the Preferred Alternative. Under the Preferred Alternative, DFAs concentrate on disturbed remote and rural areas. However, there is a potential for conflicts with existing and planned land uses. Under the Preferred Alternative, the majority of land use conflicts could occur in Imperial, Kern, Riverside, and San Bernardino counties. As shown in Appendix R2, the majority of existing land use designations within DFAs consist of BLM lands or county lands designated for agricultural, residential, and open space uses. The following is a summary of the potential land use impacts for each county within the Plan Area:

- In Imperial County, the vast majority of the designated lands within DFAs are county lands under agricultural designations. Solar and geothermal development would be the main types of development.
- In Inyo County, the vast majority of development within DFAs would be solar energy generation on BLM lands. The majority of county lands within the DFAs are under open space designations.
- In Kern County, the majority of the designated lands within DFAs are county lands under agricultural, residential, and open space designations. The majority of development in Kern County would consist of wind energy generation.
- In Los Angeles County, the majority of the designated lands within DFAs are county lands under residential designations. The majority of development in Los Angeles County would consist of solar energy generation and transmission lines.
- In Riverside County, the majority of the designated lands within DFAs are BLM lands and county-designated lands under agricultural and open space designations. The majority of development in Riverside County would consist of wind and solar energy generation.

- In San Bernardino County, the vast majority of the designated lands within DFAs are county lands under residential designations. Otherwise, the DFAs consist of BLM lands and county lands under agricultural, industrial, and open space designations. The majority of development in San Bernardino County would consist of wind and solar energy generation.
- In San Diego County, there would be no county-designated land uses within DFAs.

Land use conflicts from renewable energy development would occur from short-term construction-related disturbances. During preconstruction and construction activities, impacts to existing land uses either on or adjacent to a project site could include nuisances such as increased noise levels, dust, and emissions from construction equipment; degradation of scenic resources; and exposure to hazards or hazardous materials. Potential impacts are discussed in depth in Chapters IV.2, Air Quality; IV.19, Transportation and Public Access; IV.20, Visual Resources; and IV.21, Noise and Vibration.

Long-term operational effects from projects include the conversion of existing land uses at the project sites to renewable energy production uses and the preclusion of planned land uses. Renewable energy development typically requires large tracts of land; therefore, it is unlikely that energy facilities would be located at sites with existing built land uses, such as in existing medium- to high-density residential and commercial areas. Much of the development areas under the Preferred Alternative are on lands designated for agricultural activities and open space, or on BLM lands, with various land management designations that allow for such uses as grazing, recreation, and conservation. With the exception of transmission lines, renewable energy developments tend to be developed in rural areas, which results in the conversion of agriculture, recreation, and open space. Analyses of potential impacts to rural land uses are provided in Chapters IV.12, Agricultural Land and Production; IV.13, Bureau of Land Management Lands and Realty; IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics; IV.16, Livestock Grazing; and IV.18, Outdoor Recreation.

Long-term effects of renewable energy technologies include the conversion of existing land uses on project sites to new uses or the preclusion of planned land, which could result in inconsistencies with adopted plans, policies, designations, or regulations. Local and regional plans may earmark large areas of rural land for future uses, and development of a renewable energy project could interfere with or prevent realization of the planned uses.

Transmission line development occurs within linear corridors that traverse many types of land uses, including urban lands with high-density residential and commercial uses. Development of transmission lines typically results in short-term impacts to nearby land uses during construction. These types of impacts are detailed in Chapters IV.2, Air Quality; IV.19,

Transportation and Public Access; IV.20, Visual Resources; and IV.21, Noise and Vibration. Long-term impacts from transmission lines, such as the conversion of land, would be minimal because transmission poles or towers require a minimal amount of land and are widely spaced, often allowing existing land uses to continue in ROWs.

Impacts in Study Area Lands

“Study Area Lands” refers 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 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.3-1 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 the 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. Development of the FAAs would not result in land use impacts because county agencies will continue to have an opportunity to provide input to projects proposed in these areas and to provide input regarding the project’s consistency with local plans and policies.

Special Analysis Areas. There are two areas defined as SAAs, representing 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 and for ecological and cultural conservation, and recreation. SAA lands are expected to be designated in the Final EIR/EIS as either DFAs or included in the reserve design/Conservation Designation. As noted in Table IV.1-3, the SAAs could add 42,000 acres of DFA designated land or reserve design land under the Preferred Alternative. This extra acreage would add to the potential for land use plan and policy inconsistencies, but it would be mitigated by the measures identified in the Plan-wide analysis and in Section IV.11.3.2.1.2, Impacts of 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 plan 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. Development of the DRECP Variance Lands would not result in land use impacts because county agencies will continue to have an opportunity to provide input to projects proposed in these areas and to provide input regarding the project's consistency with local plans and policies.

Impact Reduction Strategies and Mitigation

Plan implementation would result in conservation of some desert lands and development of renewable energy generation and transmission facilities on other lands. The impacts of the renewable energy development covered by the Plan would be lessened in several ways. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. In addition, 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 the Preferred Alternative (presented in Volume II, Section II.3.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes a 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 the CMAs also would be applied to nonfederal lands. No specific CMAs apply to land use planning impacts as such. However, the CMAs for many resources address land use issues directly or indirectly. These include CMAs for air resources, minerals, comprehensive trails and travel management, BLM lands and realty, livestock grazing, recreation and visitor services, and wilderness characteristics.

Laws and Regulations

Similar to the No Action Alternative, under the Preferred 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.11.3.1.1.1.

Mitigation Measures

In addition to the CMAs and existing laws and regulations applicable to land use, mitigation measures identified for specific resources would be implemented to reduce or avoid

impacts. The following chapters include mitigation measures that could address impacts associated with land uses: IV.12, Agricultural Land and Production; IV.13, Bureau of Land Management Lands and Realty; IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics; IV.16, Livestock Grazing; and IV.18, Outdoor Recreation.

The Mitigation Measure LU-1a is identified to address potential conflicts between proposed renewable energy land uses and existing or planned land uses. Because there are many variables (e.g. location, site resources or topography, type of project, jurisdiction, etc.) and a high potential for land use changes at the local level that may cause a conflict, Mitigation Measure LU-1a requires that applicants identify in their project description all applicable agency policies and how their project addresses these policies and ordinance requirements. In addition, this upfront analysis would support the project-specific National Environmental Policy Act and CEQA review (Section IV.11.1.1 General Methods), which will consider potential conflicts with renewable energy land uses and existing or planned land uses.

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

Mitigation Measures for Impact LU-1: Coordination with Local Agencies.

- LU-1a** **Minimize Inconsistencies with Local Agency Plans and Policies.** If a project is sited on land under the jurisdiction of a local agency or if a project has the potential to effect adjacent land under local agency jurisdiction, the Permittee shall, as part of an application for a renewable energy project under the Plan, address the following requirements:
- a) Document coordination with applicable local agencies to identify relevant goals, policies, and ordinance requirements for renewable energy development. This effort will include:
 - i. Identifying all applicable policies and requirements applicable to the proposed project including those related to air quality, noise, agriculture, biological resources, aesthetics, and other issue areas that are addressed in agency plans and ordinances.
 - ii. Identifying how the project addresses applicable policies and requirements and if inconsistencies are identified address how the project will avoid or minimize potential inconsistencies or the actions needed to make the project consistent (local agency plan amendment or zone change).

- b) The Permittee shall document measures used to keep applicable agencies notified of project progress, project timelines, and anticipated construction, monitoring, and decommissioning schedules. This information will be important not only to agencies but also to property owners and should be addressed in one document that covers all applicable issue areas (e.g., land use, agriculture, noise, air quality, and other issues).

IV.11.3.2.1.2 Impacts of the Reserve Design

The proposed CPAs total approximately 325,000 acres with approximately 312,000 acres of this amount proposed on nonfederal land within the Plan Area under the Preferred Alternative (see Table IV.11-2 and Appendix R2, Tables R2.11-2 and R2.11-3). CPAs are areas outside of existing conserved lands that would be available for conservation under the Plan if there were willing sellers of this land. Based on adopted county General Plan land use designations, open space land uses would dominate the reserve design, with approximately 132,000 acres in the proposed CPAs under the Preferred Alternative. Similar to potential development in the DFAs, the creation of the reserve design with the establishment of CPAs where there are willing sellers could conflict with existing and planned land uses (primarily agricultural and rural residential) in Los Angeles, Inyo, and Kern counties. Plan-wide, the potential for conflicts with existing and planned land uses and adopted policies would be the greatest in areas designated for agricultural and residential uses. In counties with extensive open land, agriculture and low-density residential are typical categories applied to these areas in General Plans. Kern County's General Plan and Zoning Ordinance currently include renewable energy components, and the county has processed and approved numerous wind and solar energy developments. As noted earlier, while there are many variables (e.g. location, site resources or topography, type of project, jurisdiction, etc.) and a high potential for land use changes that may cause a conflict, Mitigation Measure LU-1a will reduce the potential for policy inconsistencies to a less-than-significant level. Further, each project will undergo further National Environmental Policy Act and CEQA review to evaluate project-specific impacts (Section IV.11.1.1).

IV.11.3.2.2 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 the LUPA and the impacts of the amended land use plans themselves.

IV.11.3.2.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land

The type of impacts related to BLM LUPA actions for renewable energy and transmission development would be the same as the Plan-wide land use impacts discussed under Impact LU-1. Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics, discuss in detail impacts to BLM-designated lands.

IV.11.3.2.2.2 Impacts of Changes to BLM Land Designations

Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics, discuss in detail impacts of changes to BLM land designations. BLM lands would benefit from the management strategies and disturbance caps implemented in areas where conservation and resource protection are paramount under the proposed changes. DFAs on BLM lands would encourage renewable energy development at those locations, resulting in industrial-type development where previously there was little or none.

IV.11.3.2.3 Impacts of Natural Community Conservation Plan: Preferred Alternative

The analysis of Covered Activities under the NCCP is equivalent to the Plan-wide analysis of the interagency alternatives. Reserve design features and other conservation actions under the NCCP alternatives represent more detailed categories of the reserve design under the interagency Plan-wide alternatives. These NCCP differences in reserve design features do not affect nonbiological resources analyzed in this document; and the analysis of reserve design and conservation and management actions under the NCCP is therefore equivalent to the Plan-wide analysis of the interagency alternatives, as described in in Section IV.11.3.2.1, Plan-wide Impacts of Implementing the DRECP: Preferred Alternative.

IV.11.3.2.4 Impacts of General Conservation Plan

The impacts of the GCP for the Preferred Alternative would be similar to those defined in Section IV.11.3.2.1 for the Plan-wide analysis, but they would only occur on nonfederal lands.

On the 1,632,000 acres of nonfederal (GCP) lands under the Preferred Alternative, land use conflicts would occur primarily with lands designated for residential and agricultural uses in Imperial, Kern, Riverside, Los Angeles, and San Bernardino counties. Overall, the potential impact on agricultural land use designations would be the greatest on nonfederal (GCP) lands and would total approximately 624,000 acres (see Appendix R2, Table R3.11-3). Refer to Chapter IV.12, Agricultural Land and Production, for impacts to agricultural resources.

IV.11.3.2.5 Impacts Outside the Plan Area

IV.11.3.2.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on land use and policies would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.11.3.1.5.1, Impacts of Transmission Outside the Plan Area.

IV.11.3.2.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

Analysis of BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

IV.11.3.2.6 CEQA Significance Determination for the Preferred Alternative

LU-1: Plan components would conflict with existing and planned land uses and related plans and policies. The Preferred Alternative for the DRECP could conflict with existing land uses and policies in several of the counties within the Plan Area. If a project were deemed to be in conflict with adopted plans, regulations, and policies, local authorities would need to determine whether they would amend these to address the conflict. As noted earlier, there are many variables (e.g. location, site resources or topography, type of project, jurisdiction, etc.) and a high potential for land use changes that may cause a land use conflict. Mitigation Measure LU-1a requires that applicants identify how the project addresses applicable agency policies and if inconsistencies are identified address how the project will avoid or minimize potential inconsistencies or the actions needed to make the project consistent. After implementation of the CMAs and existing laws and regulations as well as Mitigation Measure LU-1a (Minimize Inconsistencies with Local Agency Plans and Policies), land use impacts associated with the Preferred Alternative would be less than significant with mitigation.

IV.11.3.2.7 Comparison of the Preferred Alternative with No Action Alternative

Chapter IV.27, Comparison of Alternatives, 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.11.3.2.7.1 Preferred Alternative Compared with No Action Alternative for Plan-wide DRECP

Compared to the No Action Alternative, the Preferred Alternative would have fewer potential conflicts with agency plans and policies. The total DFAs in the Plan Area are 2,024,000 acres with approximately 1,632,000 acres on nonfederal lands. The No Action Alternative

includes approximately 6,291,000 acres with approximately 3,432,000 of these acres on nonfederal lands in available development areas (see Table IV.11-1). The Preferred Alternative DFAs are based on consideration of sensitive biological and environmental resources, which is not the case for the Available Development Areas under the No Action Alternative. Therefore, there is the potential for a longer review process and more policy inconsistencies under the No Action Alternative. In terms of overall acreages, the potential conflicts with agricultural, residential, and open space land uses and designations in the seven counties would be lower than those for the No Action Alternative, with significant less open space acreage on nonfederal lands with the Preferred Alternative.

IV.11.3.2.7.2 Preferred Alternative Compared with No Action Alternative for the BLM Land Use Plan Amendment

A comparison of the Preferred Alternative to the No Action Alternative for BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

IV.11.3.2.7.3 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.11.3.2.1 for the Plan-wide analysis.

IV.11.3.2.7.4 Preferred Alternative Compared with No Action Alternative for the GCP

Within the approximately 5,585,000 acres of GCP lands under the Preferred Alternative, potential planned land use conflicts would occur primarily with lands designated for residential, agricultural, and open space land uses in Imperial, Kern, Riverside, and San Bernardino counties. Overall, the potential impact on agricultural land use designations would be the greatest on GCP DFA lands and would total approximately 624,000 acres (see Appendix R2, Table R2.11-3). Under the No Action Alternative, the total of renewable energy development on nonfederal lands would be similar but would likely be dispersed across the Plan Area. Under the Preferred Alternative, the impacts would be concentrated within the DFAs.

IV.11.3.3 Alternative 1

IV.11.3.3.1 Plan-wide Impacts of Implementing the DRECP: Alternative 1

Under Alternative 1, renewable energy-related activities covered in the Plan would be confined to DFAs that would encompass approximately 1,070,000 acres, with approximately 971,000 acres of the total DFAs on nonfederal lands (see Table IV.11-1). This amount includes all potential lands without consideration of land use constraints.

However, the estimated permanent disturbance area is approximately 148,000 acres (see Table IV.1-1). Alternative 1 emphasizes renewable energy development on disturbed lands with few resource conflicts. Similar to the Preferred Alternative, there is the potential for land use compatibility impacts from renewable energy development within the DFAs—specifically ground disturbance and the operational effects of each of the technologies and their associated transmission.

IV.11.3.3.1.1 Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development

Impact Assessment

The types of land use impacts would be the same as discussed under the Preferred Alternative (Section IV.11.3.2.1). However, the amount of land affected in the Plan Area would differ under this alternative.

Impact LU-1: Plan components would conflict with existing and planned land uses and related plans and policies.

Alternative 1 would concentrate renewable energy development generally on disturbed lands in Imperial and Riverside counties. The majority of potential land use policy and planned land use conflicts could occur in Imperial, Riverside, and San Bernardino counties. Within the DFAs, the potential for compatibility conflicts would occur primarily with agricultural, residential, and open space uses (see Appendix R2, Table R2.11-4). Imperial and San Bernardino counties would have the most acreage potentially affected. The following is a summary of the potential land use impacts for each county within the Plan Area:

- In Imperial County, the vast majority of the designated lands within DFAs are county lands under agricultural designations. Solar and geothermal development would be the main types of development.
- In Inyo County, the vast majority of development within DFAs would be solar energy generation on BLM lands. The majority of county lands within DFAs are open space designations.
- In Kern County, the majority of the designated lands within DFAs are county lands under agricultural, residential, and open space designations. The majority of development in Kern County would consist of solar and wind energy generation.
- In Los Angeles County, the majority of the designated lands within DFAs are county lands under residential land designations. The majority of development in Los Angeles County would consist of solar energy generation and transmission lines.

- In Riverside County, the majority of the designated lands within DFAs are county-designated lands under agricultural and open space designations. The majority of development in Riverside County would consist of wind and solar energy generation.
- In San Bernardino County, the vast majority of the designated lands within DFAs are county lands under residential designations. Otherwise, the DFAs consist of county lands under agricultural, industrial, and open space land designations. The majority of development in San Bernardino County would consist of wind and solar energy generation.
- In San Diego County, there would be no county-designated land uses within DFAs.

Impacts in Study Area Lands

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

Special Analysis Areas. Designating the SAAs as conservation would have minimal impact on this resource. Impacts would be the same as those explained for the Plan-wide reserve design in Section IV.11.2.2, Impacts of 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 plan 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. Development of the DRECP Variance Lands would not result in land use impacts because county agencies will continue to have an opportunity to provide input to projects proposed in these areas and to provide input regarding the project's consistency with local plans and policies.

Impact Reduction Strategies and Mitigation

Plan implementation would result in conservation of some desert lands and development of renewable energy generation and transmission facilities on other lands. The impacts of the renewable energy development covered by the Plan would be lessened in several ways. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. In addition, 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 1 (presented in Volume II, Section II.3.1.1.1) 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 1. While the CMAs were developed for BLM lands only, this analysis assumes that all CMAs would be applied also to nonfederal lands. However, the CMAs for many resources address land use issues directly or indirectly. These include CMAs for air resources, minerals, comprehensive trails and travel management, BLM lands and realty, livestock grazing, recreation and visitor services, and wilderness characteristics.

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.11.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, mitigation measures will be applied to reduce further some of the DRECP's adverse impacts. Potentially applicable mitigation measures for Alternative 1 are the same as those described under the Preferred Alternative.

IV.11.3.3.1.2 Impacts from Reserve Design

The impacts from the reserve design for Alternative 1 would be the same as for the Preferred Alternative, except that the proposed CPAs would total approximately 351,000 acres with approximately 338,000 acres of this amount proposed on nonfederal lands within the Plan Area (see Table IV.11-2 and Appendix R2). This is an approximately 8% more land than under the Preferred Alternative. Open space land uses would dominate the CPAs Plan-wide within county lands, with approximately 142,000 acres in the proposed CPAs under Alternative 1.

IV.11.3.3.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 1

IV.11.3.3.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land

The type of impacts related to BLM LUPA actions for renewable energy and transmission development would be the same as the Plan-wide land use impacts discussed under Impact

LU-1. Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics, discuss in detail impacts to BLM-designated lands.

IV.11.3.3.2 Impacts of Changes to BLM Land Designations

Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics, discuss in detail impacts of changes to BLM land designations. BLM lands would benefit from the management strategies and disturbance caps implemented in areas where conservation and resource protection are paramount under the proposed changes. DFAs on BLM lands would encourage renewable energy development at those locations, resulting in industrial-type development where previously there was little or none.

IV.11.3.3.3 Impacts of Natural Community Conservation Plan: Alternative 1

The analysis of Covered Activities under the NCCP is equivalent to the Plan-wide analysis of the interagency alternatives. Reserve design features and other conservation actions under the NCCP alternatives represent more detailed categories of the reserve design under the interagency Plan-wide alternatives. These NCCP differences in reserve design features do not affect nonbiological resources analyzed in this document, and the analysis of reserve design and CMAs under the NCCP is therefore equivalent to the Plan-wide analysis of the interagency alternatives, as described in Section IV.11.3.2.1.

IV.11.3.3.4 Impacts of General Conservation Plan

The impacts of the GCP for Alternative 1 would be similar to those defined in Section IV.11.3.2.1 for the Plan-wide analysis, but they would occur on nonfederal lands only.

For Alternative 1, the disturbance area in the DFAs totals approximately 971,000 acres with approximately 148,000 acres of permanent disturbance (see Table IV.11-1 and Table IV.1-1). Alternative 1 would have slightly more acreage of permanent disturbance but approximately 9% less DFA area than the Preferred Alternative. Potential planned land use conflicts would occur primarily with designated residential and agricultural lands in Imperial, Kern, Los Angeles, Riverside, and San Bernardino counties. Overall, the potential impact to agricultural land use designations would be the greatest on nonfederal (GCP) lands.

IV.11.3.3.5 Impacts Outside the Plan Area

IV.11.3.3.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on land use and policies would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.11.3.1.5.1, Impacts of Transmission Outside the Plan Area.

IV.11.3.3.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

Analysis of BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

IV.11.3.3.6 CEQA Significance Determination for Alternative 1

LU-1: Plan components would conflict with existing and planned land uses and related plans and policies. The CEQA significance determination for Alternative 1 would be the same as the Preferred Alternative. As under the Preferred Alternative, Alternative 1 could conflict with existing land uses and policies in several of the counties within the Plan Area. If a project were deemed to be in conflict with adopted plans, regulations, and policies, local authorities would need to determine whether they would amend these to address the conflict. A land use plan or policy conflict could result from many variables (e.g. location, site resources or topography, type of project, jurisdiction, etc.), and plan and policy changes made by local agencies after completion of this Plan could result in additional inconsistencies. Mitigation Measure LU-1a requires that applicants identify how the project addresses applicable agency policies and if inconsistencies are identified address how the project will avoid or minimize potential inconsistencies or the actions needed to make the project consistent. After implementation of the CMAs and existing laws and regulations as well as Mitigation Measure LU-1a (Minimize Inconsistencies With Local Agency Plans and Policies), land use impacts associated with Alternative 1 would be less than significant with mitigation.

IV.11.3.3.7 Comparison of Alternative 1 with the Preferred Alternative

Chapter IV.27, Comparison of Alternatives, 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.11.3.3.7.1 Alternative 1 Compared with Preferred Alternative for Plan-wide DRECP

Compared to the Preferred Alternative, Alternative 1 would result in substantially less ground disturbance in the DFAs (see Table IV.11-1). The majority of potential conflicts with existing and planned land uses would occur in Imperial and San Bernardino counties; in comparison, potential land use conflicts under the Preferred Alternative would be concentrated in the same counties but would also include Kern and Riverside Counties. The following comparison provides the differences in land use designations and technology types between the Preferred Alternative and Alternative 1 by county:

- In Imperial County, the majority of DFA lands are designated as agriculture under both the Preferred Alternative and Alternative 1.

Under the Preferred Alternative, solar, wind, and geothermal energy could be developed on approximately 733,000 acres of identified DFA land. Alternative 1 would have the same energy mix with the potential for approximately 442,000 acres of DFA land. The acreage of potential land disturbance would be greater under the Preferred Alternative.

- In Inyo County, the Preferred Alternative includes approximately 45,000 acres of DFA lands, which includes approximately 10,000 acres of lands designated as open space (nonfederal lands). Alternative 1 includes approximately 22,000 acres of DFA lands with approximately 7,900 acres of these county lands under open space designations.

Under the Preferred Alternative solar and geothermal energy development would potentially occur in the county. While under Alternative 1, solar energy would be developed but not geothermal. The acreage of potential land use impacts due to renewable energy development is less under Alternative 1.

- In Kern County, the majority of the designated lands within DFAs are county lands under agricultural, residential, and open space designations under the Preferred Alternative. Under Alternative 1, the same land designations are prominent, but the acreage of potential development within each of these designations is much greater under the Preferred Alternative.

The majority of development in Kern County could consist of wind energy development under the Preferred Alternative (approximately 360,000 acres). Under Alternative 1, there could be approximately 122,000 acres of wind and solar energy development. The acreage of potential land use impacts due to renewable energy development is much greater under the Preferred Alternative.

- In Los Angeles County, under the Preferred Alternative, the majority of the designated lands within DFAs are residential (165,000 acres) under county jurisdiction.

Under Alternative 1, the majority of the county-designated lands within DFAs include approximately 70,000 acres of residential land designations.

Under both alternatives, the majority of development in Los Angeles County would consist of solar energy generation and transmission lines. The acreage of potential development would be greater under the Preferred Alternative.

- In Riverside County, the majority of the designated lands within DFAs include county lands under agriculture (68,000 acres) and open space (18,000 acres) designations under the Preferred Alternative. The vast majority of the designated lands under Alternative 1 include approximately 66,000 acres of county-designated agricultural lands.

The majority of development in Riverside County would consist of wind and solar energy generation under the Preferred Alternative, with a total of approximately 268,000 acres. Under Alternative 1, there would be approximately 99,000 acres of solar, wind, and transmission development. The acreage of potential land use impacts due to renewable energy development is greater under the Preferred Alternative.

- In San Bernardino County, under the Preferred Alternative, the majority of designated lands within DFAs include approximately 242,000 acres of county lands under residential designations. Under Alternative 1, the majority of the designated lands include approximately 193,000 acres of county lands under residential designations and approximately 20,000 acres under agricultural land designations.

Under the Preferred Alternative, the majority of development in San Bernardino County would consist of approximately 399,000 acres of wind and solar energy generation. Under Alternative 1, development in San Bernardino County would consist of approximately 274,000 acres of solar and wind energy and transmission lines. The acreage of potential land use impacts due to renewable energy development is greater under the Preferred Alternative.

- In San Diego County, neither alternative would have county-designated land uses within DFAs. There would be no land use impacts in San Diego County.

According to the Plan-wide totals from Table IV.11-1, the Preferred Alternative has a significantly larger DFA (2,024,000 acres) compared with Alternative 1 (1,070,000 acres). Given the smaller acreage of disturbance in the DFAs under Alternative 1, the potential for land use and policy impacts would be less than under the Preferred Alternative.

IV.11.3.3.7.2 Alternative 1 Compared with Preferred Alternative for the BLM Land Use Plan Amendment

A comparison of Alternative 1 to the Preferred Alternative for BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

IV.11.3.3.7.3 Alternative 1 Compared with Preferred Alternative for a

The impacts of the NCCP for Alternative 1 are the same as those for the Preferred Alternative and are discussed in Section IV.11.3.2.1 for the Plan-wide analysis.

IV.11.3.3.7.4 Alternative 1 Compared with Preferred Alternative for the GCP

For Alternative 1, the disturbance area in the DFAs totals approximately 971,000 acres of nonfederal lands, which is significantly smaller than the approximately 1,632,000 acres in the Preferred Alternative. Potential planned land use conflicts would be geographically similar and would occur primarily within designated residential and agricultural lands in Imperial, Kern, Riverside, and San Bernardino counties. Overall, the potential impact to agricultural land use designations would be the greatest on nonfederal (GCP) lands under both alternatives.

IV.11.3.4 Alternative 2

IV.11.3.4.1 Plan-wide Impacts of Implementing the DRECP: Alternative 2

Under Alternative 2, renewable energy activities covered by the Plan are confined to DFAs, which encompass approximately 2,472,000 acres with approximately 1,730,000 acres on nonfederal lands. As noted in Table IV.1-1, Alternative 2 would include approximately 134,000 acres of permanent disturbance area. Alternative 2 emphasizes renewable energy development that is geographically balanced and transmission aligned. Like the Preferred Alternative, there is the potential for impacts from renewable energy development within the DFAs, specifically from ground disturbance and the operational effects from each of the technologies and transmission.

IV.11.3.4.1.1 Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development

Impact Assessment

The types of land use impacts would be the same as discussed under the Preferred Alternative (Section IV.11.3.2.1); however, the amount of land affected in the Plan Area would be greater under this alternative.

Impact LU-1: Plan components would conflict with existing and planned land uses and related plans and policies.

Under Alternative 2, generation development and transmission would be more prevalent in San Bernardino, Imperial, and Riverside counties, with fewer potential locations in Kern County. Based on the geographic distribution of generation development within the DFAs under Alternative 2, the majority of potential existing and planned land use conflicts could occur in Imperial, Kern, and Riverside counties. The lands in the counties with potential land use conflicts are designated predominately for agricultural, open space, and residential uses. Based on Tables R2.11-6 and R2.11-7 in Appendix R2, the following is a summary of the potential land use impacts for each county within the Plan Area:

- In Imperial County, the vast majority of the designated lands within DFAs are BLM lands and county lands under agricultural designations. Wind and solar development would be the main types of development.
- In Inyo County, the vast majority of development within DFAs would be on BLM lands and county lands under open space designations. Wind and solar development would be the main types of development.
- In Kern County, the majority of the designated lands within DFAs are county lands under agricultural, residential, and open space designations and BLM lands. The majority of development in Kern County would consist of solar and wind energy generation.
- In Los Angeles County, the majority of the designated lands within DFAs are county lands under residential land designations. The majority of development in Los Angeles County would consist of solar energy generation and transmission lines.
- In Riverside County, the majority of the designated lands within DFAs are BLM lands and county lands under agricultural designations. The majority of development in Riverside County would consist of wind and solar energy generation.
- In San Bernardino County, the vast majority of the designated lands within DFAs are county lands under residential designations and BLM lands. Other lands are in

agricultural, industrial, and open space land designations. The vast majority of development in San Bernardino County would consist of wind energy generation.

- In San Diego County, there would be no county-designated land uses within DFAs.

Impacts in 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 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. Development of the FAAs would not result in land use impacts because county agencies will continue to have an opportunity to provide input to projects proposed in these areas and to provide input regarding the project's consistency with local plans and policies.

Special Analysis Areas. Designating the SAAs as development would result in minimal impacts similar to those identified for the DFAs for the Plan-wide Impacts.

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 plan 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. Development of the DRECP Variance Lands would not result in land use impacts because county agencies will continue to have an opportunity to provide input to projects proposed in these areas and to provide input regarding the project's consistency with local plans and policies.

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.

The impacts of the renewable energy development covered by the Plan would be lessened in several ways. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. In addition, 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 (presented in Volume II, Section II.3.1.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes definition of the reserve design and specific CMAs for the Preferred Alternative. While the CMAs were developed for BLM lands only, this analysis assumes that all CMAs would be applied also to nonfederal lands. No CMAs specifically apply to land use planning impacts. However, the CMAs for many resources address land use issues directly or indirectly. These include CMAs for air resources, minerals, comprehensive trails and travel management, BLM lands and realty, livestock grazing, recreation and visitor services, and wilderness characteristics.

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.11.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, mitigation measures will be applied to reduce further some of the DRECP's adverse impacts. Potentially applicable mitigation measures for Alternative 2 are the same as those described under the Preferred Alternative.

IV.11.3.4.1.2 Impacts from Reserve Design

The impacts from the reserve design for Alternative 2 would be the same as those discussed for the Preferred Alternative, except that the proposed CPAs would total approximately 390,000 acres with approximately 375,000 acres proposed on nonfederal land within the Plan Area for Alternative 2. This is approximately 65,000 acres more or 20% greater than the Preferred Alternative. Open space designations would dominate the CPAs Plan-wide within county lands under Alternative 2.

IV.11.3.4.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 2

IV.11.3.4.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land

The type of impacts related to BLM LUPA actions for renewable energy and transmission development would be the same as the Plan-wide land use impacts discussed under Impact LU-1. Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics, discuss in detail impacts to BLM-designated lands.

IV.11.3.4.2.2 Impacts of Changes to BLM Land Designations

Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics, discuss in detail impacts of changes to BLM land designations. BLM lands would benefit from the management strategies and disturbance caps implemented in areas where conservation and resource protection are paramount under the proposed changes. DFAs on BLM lands would encourage renewable energy development at those locations, resulting in industrial-type development where previously there was little or none.

IV.11.3.4.3 Impacts of Natural Community Conservation Plan: Alternative 2

The analysis of Covered Activities under the NCCP is equivalent to the Plan-wide analysis of the interagency alternatives. Reserve design features and other conservation actions under the NCCP alternatives represent more detailed categories of the reserve design under the interagency Plan-wide alternatives. These NCCP differences in reserve design features do not affect nonbiological resources analyzed in this document, and the analysis of reserve design and CMAs under the NCCP is therefore equivalent to the Plan-wide analysis of the interagency alternatives, as described in Section IV.11.3.2.1.

IV.11.3.4.4 Impacts of General Conservation Plan

The impacts of the GCP for Alternative 2 would be similar to those defined in Section IV.11.3.2.1 for the Plan-wide analysis, but they would occur on nonfederal lands only.

Appendix R2, Table R2.11-7, shows the DFA disturbance acreages by county and land use designation within the 1,730,000 acres of GCP lands under Alternative 2. Potential planned land use conflicts could occur primarily with designated as open space, residential, and agricultural lands. The majority of the potential policy conflicts could occur in Imperial, Kern, Los Angeles, and San Bernardino counties, with a combined total of approximately 1,600,000 acres for these counties. The total acreage of GCP DFAs is lower in Alternative 2

than in the Preferred Alternative (see Table IV.11-1). Overall, agricultural and residential land use designations on the nonfederal lands (GCP) have the potential to be impacted more under Alternative 2 than under the Preferred Alternative.

IV.11.3.4.5 Impacts Outside the Plan Area

IV.11.3.4.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on land use and policies would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.11.3.1.5.1.

IV.11.3.4.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

Analysis of BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics.

IV.11.3.4.6 CEQA Significance Determination for Alternative 2

LU-1: Plan components would conflict with existing and planned land uses and related plans and policies. The CEQA significance determination for Alternative 2 would be the same as for the Preferred Alternative. As under the Preferred Alternative, Alternative 2 could conflict with existing land uses and policies in several of the counties within the Plan Area. If a project were deemed to be in conflict with adopted plans, regulations, and policies, local authorities would need to determine whether they would amend these to address the conflict. A land use plan or policy conflict could result from many variables (e.g. location, site resources or topography, type of project, jurisdiction, etc.), and plan and policy changes made by local agencies after completion of this Plan could result in additional inconsistencies. Mitigation Measure LU-1a requires that applicants identify how the project addresses applicable agency policies and if inconsistencies are identified address how the project will avoid or minimize potential inconsistencies or the actions needed to make the project consistent. After implementation of the CMAs and existing laws and regulations as well as Mitigation Measure LU-1a (Minimize Inconsistencies With Local Agency Plans and Policies), land use impacts associated with Alternative 2 would be less than significant with mitigation.

IV.11.3.4.7 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.11.3.4.7.1 Alternative 2 Compared with Preferred Alternative for Plan-wide DRECP

Compared to the Preferred Alternative, Alternative 2 would result in an approximately 20% more ground disturbance. The majority of potential existing and planned land use conflicts could occur in Imperial, Kern, and San Bernardino counties. The following is a summary of Tables R2.11-2 and R2.11-6, which compare the differences in DFA acreages by land use designations and county between the Preferred Alternative and Alternative 2.

- In Imperial County, Alternative 2 would include wind and solar energy development similar to the Preferred Alternative. The amount of county agricultural land would be the same as under the Preferred Alternative (approximately 465,000 acres for both alternatives) and for both alternatives represents the largest category of DFA land. The second-highest DFA category for both alternatives is BLM land. Under Alternative 2, the DFAs would include approximately 234,000 acres of BLM lands compared with approximately 131,000 acres under the Preferred Alternative.

- In Inyo County, the Preferred Alternative includes more than 10,000 acres of DFAs that are county lands under open space designations and approximately 26,000 acres of BLM land. By contrast, Alternative 2 includes more than 22,000 acres of county lands under open space designations, and there would be 35,000 acres of BLM land.

Under the Preferred Alternative, solar energy and geothermal energy would be developed. Under Alternative 2, solar, geothermal, and wind energy would be developed.

- In Kern County, under the Preferred Alternative, the majority of the designated lands within DFAs are county lands under agricultural, residential, and open space designations. Under Alternative 2, the same designations occur in DFAs, and the acreage of potential development within each of these designations is slightly lower under the Preferred Alternative. However, Alternative 2 would include more BLM land.

Under both the Preferred Alternative and Alternative 2, development in Kern County would include wind and solar energy development.

- In Los Angeles County, under the Preferred Alternative, the county lands in DFAs include approximately 165,000 acres of residential land designations. Under Alternative 2, the county-designated lands within DFAs include approximately 172,000 acres of residential land designations.

Under both the Preferred Alternative and Alternative 2, the majority of development in Los Angeles County would consist of solar energy generation and transmission lines.

- In Riverside County, lands within DFAs under the Preferred Alternative include approximately 172,000 acres of BLM lands and approximately 86,000 acres of county lands under agricultural and open space designations. The majority of the

designated lands under Alternative 2 include county-designated agricultural and open space lands with the same acreage as noted for the Preferred Alternative.

The majority of development in Riverside County under the Preferred Alternative includes wind and solar energy generation. Alternative 2 would include solar, wind, and transmission development.

- In San Bernardino County, under the Preferred Alternative, lands within DFAs include approximately 242,000 acres of county lands under residential designations and 40,000 acres in open space lands. Under Alternative 2, lands in DFAs include approximately 185,000 acres of BLM lands and approximately 319,000 acres of county lands with residential and open space land designations.

Under the Preferred Alternative, the majority of development in San Bernardino County would consist of wind and solar energy generation. Under Alternative 2, the majority of development in San Bernardino County would consist of solar, wind, and transmission lines.

- In San Diego County, neither alternative would have county-designated land uses within DFAs. There would be no land use impacts in San Diego County.

According to the Plan-wide totals from Table IV.11-1, Alternative 2 would have substantially greater land disturbance than the Preferred Alternative and more potential for land use plan and policy inconsistencies.

IV.11.3.4.7.2 Alternative 2 Compared with Preferred Alternative for the BLM Land Use Plan Amendment

A comparison of Alternative 2 to the Preferred Alternative for BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

IV.11.3.4.7.3 Alternative 2 Compared with Preferred Alternative for NCCP

The impacts of the NCCP for Alternative 2 are the same as those for the Preferred Alternative and are discussed in Section IV.11.3.2.1 for the Plan-wide analysis.

IV.11.3.4.7.4 Alternative 2 Compared with Preferred Alternative for the GCP

For Alternative 2, the disturbance area in the DFAs totals approximately 1,730,000 acres of nonfederal lands and is greater than the Preferred Alternative's approximately 1,632,000 acres of DFA land. Potential planned land use conflicts could occur primarily within designated as open space, residential, and agricultural lands. Under the Preferred Alternative, there would be less potential conflicts with open space land use designations throughout

the seven counties. The majority of the potential land use policy conflicts under Alternative 2 would be geographically similar to the Preferred Alternative and could occur in Imperial, Kern, and San Bernardino counties. Overall, the potential impact to agricultural land use designations would be the greatest on nonfederal (GCP) lands under both alternatives.

IV.11.3.5 Alternative 3

IV.11.3.5.1 Plan-wide Impacts of Implementing the DRECP: Alternative 3

Under Alternative 3, renewable energy development covered in the Plan is confined to DFAs comprising approximately 1,405,000 acres with approximately 1,175,000 acres of nonfederal DFA land. However, as noted in Table IV.1-1, the expected permanent disturbance area would be approximately 150,000 acres. Alternative 3 emphasizes renewable energy development that focuses on the western Mojave and is sensitive to tribal interests. Like the Preferred Alternative, there is the potential for conflicts with renewable energy development within the DFAs, specifically with ground disturbance and from the operational effects of each of the technologies and transmission.

IV.11.3.5.1.1 Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development

Impact Assessment

The types of land use impacts would be the same as discussed under the Preferred Alternative (Section IV.11.3.2.1); however, the amount of land affected in the Plan Area would differ under this alternative.

Impact LU-1: Plan components would conflict with existing and planned land uses and related plans and policies.

Under Alternative 3, generation development and transmission focus on western Mojave—which affects San Bernardino, Imperial, and Riverside counties—with fewer potential impacts in Kern County. The majority of potential land use policy and planned land use conflicts could occur in San Bernardino County. The land with potential land use conflicts in the counties is dominated by agricultural and residential designations. Based on Tables R2.11-8 and R2.11-9, in Appendix R2, the following is a summary of the potential land use impacts for each county within the Plan Area:

- In Imperial County, the vast majority of the lands within DFAs are county lands under agricultural designations and BLM lands. Solar and geothermal development would be the main types of development.

- In Inyo County, the vast majority of renewable energy development within DFAs would be on BLM lands and county lands with open space designations. Solar and geothermal development would be the main types of development.
- In Kern County, the majority of the lands within DFAs are county lands under agricultural, residential, and open space land designations. The majority of development in Kern County would be solar and wind energy generation.
- In Los Angeles County, the majority of the lands within DFAs are county lands with residential land designations. The majority of development in Los Angeles County would consist of solar energy generation and transmission lines.
- In Riverside County, the majority of the lands within DFAs are BLM lands and county lands with agricultural designations. The majority of development in Riverside County would be solar and wind energy generation.
- In San Bernardino County, the majority of the lands within DFAs are county lands with residential designations and BLM lands. Other lands have agricultural, industrial, and open space designations. The majority of development in San Bernardino County would be wind and solar energy generation.
- In San Diego County, there would be no county-designated land uses within DFAs.

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 for Alternative 3 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. Development of the FAAs would not result in land use impacts because county agencies will continue to have an opportunity to provide input to projects proposed in these areas and to provide input regarding the project's consistency with local plans and policies.

Special Analysis Areas. Designating the SAAs as conservation would have minimal impact to this resource. Impacts would be the same as those explained for the Plan-wide reserve design in Section IV.11.2.2, Impacts of 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 plan 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. Development of the DRECP Variance Lands would not result in land use impacts because county agencies will continue to have an opportunity to provide input to projects proposed in these areas and to provide input regarding the project's consistency with local plans and policies.

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. The impacts of the renewable energy development covered by the Plan would be lessened in several ways. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. In addition, 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 (presented in Volume II, Section II.3.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes definition of the reserve design and specific CMAs for the Preferred Alternative. While the CMAs were developed for BLM lands only, this analysis assumes that all CMAs would be applied also to nonfederal lands. No CMAs specifically apply to land use-planning impacts. However, the CMAs for many resources address land use issues directly or indirectly. These include CMAs for air resources, minerals, comprehensive trails and travel management, BLM lands and realty, livestock grazing, recreation and visitor services, and wilderness characteristics.

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.11.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, mitigation measures will be applied to reduce further some of the DRECP's adverse impacts. Potentially applicable mitigation measures for Alternative 3 are the same as those described under the Preferred Alternative.

IV.11.3.5.1.2 Impacts from Reserve Design

The impacts from the reserve design for Alternative 3 would be the same as for the Preferred Alternative, except that the reserve design for Alternative 3 includes CPAs totaling approximately 342,000 acres. Of this amount approximately 330,000 acres would be proposed on nonfederal land (see Table IV.11-2 and Appendix R2). This is approximately 18,000 acres or 5% more than the Preferred Alternative. Open space land use designations dominate the CPAs Plan-wide within county lands under Alternative 3.

IV.11.3.5.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 3

IV.11.3.5.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land

The type of impacts related to BLM LUPA actions for renewable energy and transmission development would be the same as the Plan-wide land use impacts discussed under Impact LU-1. Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics, discuss in detail impacts to BLM-designated lands.

IV.11.3.5.2.2 Impacts of Changes to BLM Land Designations

Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics, discuss in detail impacts of changes to BLM land designations. BLM lands would benefit from the management strategies and disturbance caps implemented in areas where conservation and resource protection are paramount under the proposed changes. DFAs on BLM lands would encourage renewable energy development at those locations, resulting in industrial-type development where previously there was little or none.

IV.11.3.5.3 Impacts of Natural Community Conservation Plan: Alternative 3

The analysis of Covered Activities under the NCCP is equivalent to the Plan-wide analysis of the interagency alternatives. Reserve design features and other conservation actions under the NCCP alternatives represent more detailed categories of the reserve design under the interagency Plan-wide alternatives. These NCCP differences in reserve design features do not affect nonbiological resources analyzed in this document; and the analysis of reserve design and conservation and management actions under the NCCP is therefore equivalent to the Plan-wide analysis of the interagency alternatives, as described in Section IV.11.3.2.1.

IV.11.3.5.4 Impacts of General Conservation Plan: Alternative 3

The impacts of the GCP for Alternative 3 would be similar to those identified in Section IV.11.3.2.1 for the Plan-wide analysis, but they would occur on nonfederal lands only.

Potential conflicts with planned land uses could occur primarily in areas designated residential and agricultural. The majority of the potential land use policy conflicts could occur in San Bernardino, Los Angeles, Imperial, Kern, and Riverside counties, on a total of approximately 207,000 acres. This total represents approximately 12% fewer acres than the Preferred Alternative.

IV.11.3.5.5 Impacts Outside the Plan Area

IV.11.3.5.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on land use and policies would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.11.3.1.5.1.

IV.11.3.5.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

Analysis of BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

IV.11.3.5.6 CEQA Significance Determination for Alternative 3

Impact LU-1: Plan components would conflict with existing and planned land uses and related plans and policies.

The CEQA significance determination for Alternative 3 would be the same as for the Preferred Alternative. As under the Preferred Alternative, Alternative 3 could conflict with existing land uses and policies in several of the counties within the Plan Area. If a project

were deemed to be in conflict with adopted plans, regulations, and policies, local authorities would need to determine whether they would amend these to address the conflict. A land use plan or policy conflict could result from many variables (e.g. location, site resources or topography, type of project, jurisdiction, etc.), and plan and policy changes made by local agencies after completion of this Plan could result in additional inconsistencies. Mitigation Measure LU-1a requires that applicants identify how the project addresses applicable agency policies and if inconsistencies are identified address how the project will avoid or minimize potential inconsistencies or the actions needed to make the project consistent. After implementation of the CMAs and existing laws and regulations as well as Mitigation Measure LU-1a (Minimize Inconsistencies With Local Agency Plans and Policies), land use impacts associated with Alternative 3 would be less than significant with mitigation.

IV.11.3.5.7 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.11.3.5.7.1 Alternative 3 Compared with Preferred Alternative for Plan-wide DRECP

Compared with the Preferred Alternative, Alternative 3 would have substantially less ground disturbance in the DFAs based on acreage (see Table IV.11-1). The majority of potential land use policy and planned land use conflicts could occur in San Bernardino and Kern counties. The following is a summary of Tables R2.11-2 and R2.11-8, which present acreages by land use designations and county for the Preferred Alternative and Alternative 3.

- In Imperial County, the amount of agricultural lands within DFAs would be greater under the Preferred Alternative (464,000 acres) than under Alternative 3 (267,000 acres). Under Alternative 3, DFAs would include approximately 94,000 acres of BLM lands compared with approximately 106,000 acres under the Preferred Alternative; BLM lands are the second-largest land use category for DFAs in this county.

Both the Preferred Alternative and Alternative 3 would include solar and geothermal energy development.

- In Inyo County, the Preferred Alternative includes more than 10,000 acres of lands within DFAs that are county lands with open space designations and approximately 26,000 acres of BLM land. Alternative 3 includes more than 8,000 acres of county lands with open space designations and approximately 13,000 acres of BLM land.

Both the Preferred Alternative and Alternative 3 would include solar and geothermal energy development.

- In Kern County, under the Preferred Alternative, the majority of the lands in DFAs are county lands with agricultural (67,000 acres), residential (80,000 acres), and open space (123,000 acres) land designations. Under Alternative 3, the same designations occur in DFAs but in lesser amounts than under the Preferred Alternative. Alternative 3 includes approximately 28,000 acres of agricultural, approximately 51,000 acres of residential, and approximately 71,000 acres of lands designated as open space.

Both the Preferred Alternative and Alternative 3 would include wind and solar energy development.

- In Los Angeles County, under the Preferred Alternative, lands under county jurisdiction in DFAs include more than 165,000 acres of residential land designations. Under Alternative 3, the majority of the county-designated lands within DFAs would also include residential land designations, but at a lesser amount of approximately 107,000 acres.

Under the Preferred Alternative, the majority of development in Los Angeles County would consist of solar energy generation and transmission lines. Alternative 3 would include solar, wind, and transmission development.

- In Riverside County, under the Preferred Alternative, lands in DFAs include approximately 172,000 acres of BLM lands and approximately 86,000 acres of county lands with agricultural and open space designations. Lands under Alternative 3 include approximately 38,000 acres of BLM land and 86,000 acres of county agricultural and open space lands.

The majority of development in Riverside County would consist of wind and solar energy generation under the Preferred Alternative. Alternative 3 would include solar, wind, and transmission development.

- In San Bernardino County, under the Preferred Alternative, the major land categories within DFAs include approximately 242,000 acres of county lands with residential designations, approximately 40,000 acres of open space land designations, and 35,000 acres of BLM lands. Under Alternative 3 lands in DFAs include approximately 220,000 acres of county lands with residential land designations, 26,000 acres of land in open space designation, and approximately 49,000 acres of BLM lands.

Under both the Preferred Alternative and Alternative 3, wind, solar, and transmission could be developed in the county.

- In San Diego County, neither alternative would have county-designated land uses within DFAs. There would be no land use impacts in San Diego County.

According to the Plan-wide totals from Table IV.11-1, the Preferred Alternative includes approximately 2,024,000 acres of DFA land; and Alternative 3 includes approximately 1,405,000 acres of DFA land. Based on the smaller acreage of ground disturbance in the DFAs, the potential for land use and policy impacts under Alternative 3 would be less than under the Preferred Alternative.

IV.11.3.5.7.2 Alternative 3 Compared with Preferred Alternative for the BLM Land Use Plan Amendment

A comparison of Alternative 3 to the Preferred Alternative for BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics.

IV.11.3.5.7.3 Alternative 3 Compared with Preferred Alternative for NCCP

Under Alternative 3, the impacts of the NCCP are the same as those for the Preferred Alternative and are discussed in Section IV.11.3.2.1 for the Plan-wide analysis.

IV.11.3.5.7.4 Alternative 3 Compared with Preferred Alternative for the GCP

Potential conflicts under Alternative 3 could occur primarily in residential and agricultural designated lands. The majority of the potential land use policy conflicts could occur in San Bernardino, Los Angeles, Imperial, Kern, and Riverside counties, on a total of approximately 1,175,000 acres. This GCP DFA acreage (nonfederal lands) is substantially less than under the Preferred Alternative (1,632,000 acres).

IV.11.3.6 Alternative 4

IV.11.3.6.1 Plan-wide Impacts of Implementing the DRECP: Alternative 4

Under Alternative 4, renewable energy development activities covered by the Plan are confined to DFAs comprising approximately 1,608,000 acres with approximately 1,332,000 acres of nonfederal DFA land. However, as noted in Table IV.1-1, the estimated permanent disturbance area is approximately 148,000 acres. Alternative 4 would maximize renewable energy development flexibility and could create land use incompatibility. Impacts that could result from renewable energy development within the DFAs would occur from specific ground disturbance and the operational effects from each of the technologies and its required transmission.

IV.11.3.6.1.1 Plan-wide Impacts and Mitigation Measures from Renewable Energy and Transmission Development

Impact Assessment

The types of land use impacts would be the same as discussed under the Preferred Alternative (Section IV.11.3.2.1); however, the amount of land affected in the Plan Area would differ under this alternative.

Impact LU-1: Plan components would conflict with existing and planned land uses and related plans and policies.

Under Alternative 4, generation development and transmission are focused in Imperial, Kern, Los Angeles, Riverside, and San Bernardino counties, with fewer potential impacts in Kern County. Based on the geographic distribution of generation development within the DFAs under Alternative 4, the majority of potential land use policy and planned land use conflicts could occur in San Bernardino, Imperial, and Riverside counties. The land with potential land use conflicts in the counties are those with agricultural and residential designations. Lands shown as open space would also be affected in several counties, most significantly in Kern County (based on nonfederal acreage). Based on Table R2.11-10 in Appendix R2, the following is a summary of the potential land use impacts for each county within the Plan Area:

- In Imperial County, the vast majority of the lands within DFAs are county lands with agricultural designations and BLM lands. Solar and geothermal development would be the main types of development.
- In Inyo County, the vast majority of development within DFAs would be on BLM lands and county lands with open space designations. Solar and geothermal development would be the main types of development.
- In Kern County, the majority of the lands within DFAs are county lands under agricultural, residential, and open space land designations. The majority of development in Kern County would be solar and wind energy generation.
- In Los Angeles County, the majority of the lands within DFAs are county lands with residential land designations. The majority of development in Los Angeles County would consist of solar energy generation and transmission lines.
- In Riverside County, the majority of the lands within DFAs are BLM lands, and county lands with agricultural designations. The majority of development in Riverside County would consist of solar and wind energy generation.

- In San Bernardino County, the majority of the lands within DFAs are county lands with residential designations. Other lands have agricultural, industrial, and open space designations. The majority of development in San Bernardino County would be wind and solar energy generation.
- In San Diego County, there would be no county-designated land uses within DFAs.

Impacts in Study Area Lands

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

Special Analysis Areas. Designating the SAAs as conservation would have minimal impact to this resource. Impacts would be the same as those explained for the Plan-wide reserve design in the Section IV.11.3.6.1.2, Impacts from 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 plan 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. Development of the DRECP Variance Lands would not result in land use impacts because county agencies will continue to have an opportunity to provide input to projects proposed in these areas and to provide input regarding the project's consistency with local plans and policies.

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. The impacts of the renewable energy development covered by the Plan would be lessened in several ways. First, the Plan incorporates CMAs for each alternative, including specific biological reserve design components and LUPA components. In addition, 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 (presented in Volume II, Section II.3.1.1) defines specific actions that would reduce the impacts of this alternative. The conservation strategy includes a 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 be applied also to nonfederal lands. No CMAs specifically apply to land use planning impacts. However, the CMAs for many resources address land use issues directly or indirectly. These include CMAs for air resources, minerals, comprehensive trails and travel management, BLM lands and realty, livestock grazing, recreation and visitor services, and wilderness characteristics.

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.11.3.1.1.1.

Mitigation Measures

After implementation of the CMAs and existing laws and regulations, mitigation measures will be applied to reduce further some of the DRECP's adverse impacts. Potentially applicable mitigation measures for Alternative 4 are the same as those described under the Preferred Alternative.

IV.11.3.6.1.2 Impacts from Reserve Design

The impacts from the reserve design for Alternative 4 would be the same as for the Preferred Alternative, except that the proposed CPAs would total approximately 340,000 acres within the Plan Area for Alternative 4. This amount would include approximately 328,000 acres of nonfederal land (see Table IV.11-1 and Appendix R2). This is approximately 9% more than under the Preferred Alternative. Open space and residential land use designations would dominate the CPAs Plan-wide within county lands under Alternative 4.

IV.11.3.6.2 Impacts of DRECP Land Use Plan Amendment on BLM Land: Alternative 4

IV.11.3.6.2.1 Impacts from Renewable Energy and Transmission Development on BLM Land

The type of impacts related to BLM LUPA actions for renewable energy and transmission development would be the same as the Plan-wide land use impacts discussed under Impact LU-1. Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics, discuss in detail impacts to BLM-designated lands.

IV.11.3.6.2 Impacts of Changes to BLM Land Designations

Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands With Wilderness Characteristics, discuss in detail impacts of changes to BLM land designations. BLM lands would benefit from the management strategies and disturbance caps implemented in areas where conservation and resource protection are paramount under the proposed changes. DFAs on BLM lands would encourage renewable energy development at those locations, resulting in industrial-type development where previously there was little or none.

IV.11.3.6.3 Impacts of Natural Community Conservation Plan: Alternative 4

The analysis of Covered Activities under the NCCP is equivalent to the Plan-wide analysis of the interagency alternatives. Reserve design features and other conservation actions under the NCCP alternatives represent more detailed categories of the reserve design under the interagency Plan-wide alternatives. These NCCP differences in reserve design features do not affect nonbiological resources analyzed in this document; and the analysis of reserve design and conservation and management actions under the NCCP is therefore equivalent to the Plan-wide analysis of the interagency alternatives, as described in Section IV.11.3.2.1.

IV.11.3.6.4 Impacts of General Conservation Plan: Alternative 4

The impacts of the GCP for Alternative 4 would be similar to those identified in Section IV.11.3.2.1 for the Plan-wide analysis, but they would occur on nonfederal lands only.

Appendix R2 (Table R2.11-11) shows the DFA disturbance acreages by county within the approximately 328,000 acres of GCP lands under Alternative 4. Potential conflicts could occur, primarily with lands designated as residential and open space designated lands. The majority of potential conflicts would occur in San Bernardino and Kern counties, on approximately 1,332,000 acres of DFA lands. This is approximate 22% more DFAs lands in the GCP than under the Preferred Alternative.

IV.11.3.6.5 Impacts Outside the Plan Area

IV.11.3.6.5.1 Impacts of Transmission Outside the Plan Area

The impacts of transmission outside the Plan Area on land use and policies would be the same under all alternatives. These impacts are as described for the No Action Alternative in Section IV.11.3.1.5.1.

IV.11.3.6.5.2 Impacts of BLM LUPA Decisions Outside the Plan Area

Analysis of BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

IV.11.3.6.6 CEQA Significance Determination for Alternative 4

LU-1: Plan components would conflict with existing and planned land uses and related plans and policies. The CEQA significance determination for Alternative 4 would be the same as for the Preferred Alternative. As under the Preferred Alternative, Alternative 4 could conflict with existing land uses and policies in several of the counties within the Plan Area. If a project were deemed to be in conflict with adopted plans, regulations, and policies, local authorities would need to determine whether they would amend these to address the conflict. A land use plan or policy conflict could result from many variables (e.g. location, site resources or topography, type of project, jurisdiction, etc.), and plan and policy changes made by local agencies after completion of this Plan could result in additional inconsistencies. Mitigation Measure LU-1a requires that applicants identify how the project addresses applicable agency policies and if inconsistencies are identified address how the project will avoid or minimize potential inconsistencies or the actions needed to make the project consistent. After implementation of the CMAs and existing laws and regulations as well as Mitigation Measure LU-1a (Minimize Inconsistencies With Local Agency Plans and Policies), land use impacts associated with Alternative 4 would be less than significant with mitigation.

IV.11.3.6.7 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.11.3.6.7.1 Alternative 4 Compared with Preferred Alternative for Plan-wide DRECP

Compared with the Preferred Alternative, Alternative 4 would result in an approximately 25% less ground disturbance in the DFAs. The majority of potential land use policy and land use plan conflicts could occur in San Bernardino and Imperial counties. Lands shown as open space would also be affected in several counties, most significantly in Kern County (nonfederal land). The following is a summary of Tables R2.11-2 and R2.11-10, which presents the land use designations by county for the Preferred Alternative and Alternative 4.

- In Imperial County, the majority of the lands within DFAs are county agricultural lands under both the Preferred Alternative and Alternative 4.

The Preferred Alternative would include approximately 733,000 acres of DFA land identified for solar, wind, and geothermal energy development. Alternative 4 would include approximately 447,000 of DFA land for solar and geothermal energy generation.

- In Inyo County, the Preferred Alternative includes more than 10,000 acres of lands within DFAs that are county lands with open space designations and approximately 26,000 acres of BLM land. Alternative 4 includes approximately 13,000 acres of county lands under open space designations and approximately 15,000 acres of BLM land.

Under both the Preferred Alternative and Alternative 4, solar energy and geothermal energy would be developed.

- In Kern County, under the Preferred Alternative, the majority of the lands within DFAs are county lands with agricultural, residential, and open space land designations. Under Alternative 4, the same prominent land designations occur within DFAs in Kern County.

Both the Preferred Alternative and Alternative 4 would include wind energy and solar energy development.

- In Los Angeles County, under the Preferred Alternative, the majority of the lands under county jurisdiction in DFAs are residential designated lands (approximately 165,000 acres). Under Alternative 4, the majority of the county lands within DFAs are also residential designated lands at the same acreage.

Under both alternatives, the majority of development in Los Angeles County would consist of solar energy generation and transmission lines.

- In Riverside County, under the Preferred Alternative, DFA lands include approximately 172,000 acres of BLM lands and approximately 86,000 acres of county lands with agricultural and open space designations. The lands under Alternative 4 include approximately 163,000 acres of BLM lands and approximately 86,000 acres of county agricultural and open space lands.

Both the Preferred Alternative and Alternative 4 would primarily include wind and solar development.

- In San Bernardino County, under the Preferred Alternative, lands within DFAs include approximately 242,000 acres of county lands under residential designations and 40,000 acres of lands designated as open space. Under Alternative 4, the lands in DFAs include approximately 40,000 acres of lands designated as open space and approximately 226,000 acres of county lands with residential designations.

The Preferred Alternative would primarily include wind and solar energy generation. Alternative 4 would primarily include solar energy, wind energy, and transmission lines.

- In San Diego County, neither alternative would have county-designated land uses within DFAs. There would be no land use impacts in San Diego County.

According to the Plan-wide totals from Table IV.11-1, Alternative 4 would include 1,608,000 acres of DFA land compared with approximately 2,024,000 acres under the Preferred Alternative. Based on the smaller acreage of ground disturbance in the DFAs, the potential for land use and policy impacts under Alternative 4 would be less than under the Preferred Alternative.

IV.11.3.6.7.2 Alternative 4 Compared with Preferred Alternative for the BLM Land Use Plan Amendment

A comparison of Alternative 4 with the Preferred Alternative for BLM LUPA impacts on land use is presented in Chapters IV.13, Bureau of Land Management Lands and Realty, and IV.14, Bureau of Land Management Land Designations, Classifications, Allocations, and Lands with Wilderness Characteristics.

IV.11.3.6.7.3 Alternative 4 Compared with Preferred Alternative for NCCP

The impacts of the NCCP for Alternative 4 are the same as those defined in Section IV.11.3.2.1 for the Plan-wide analysis. As a result, the comparison of Alternative 4 with the Preferred Alternative for the NCCP is the same as described for Plan-wide DRECP.

IV.11.3.6.7.4 Alternative 4 Compared with Preferred Alternative for the GCP

Under Alternative 4, potential conflicts could occur, primarily with lands designated as agricultural, residential, or open space because these are the areas with the largest DFA lands. The majority of the potential conflicts would occur in Imperial, Kern, Los Angeles, and San Bernardino counties on approximately 1,332,000 acres of DFA land under the GCP. Alternative 4 includes less acreage (300,000 acres less) than the Preferred Alternative under the GCP.