

**DRAFT FOR PUBLIC COMMENT: Los Mogotes East Solar Energy Zone (SEZ): Resources, Impacts, & On-site Mitigation**  
 In southeast Conejos County, La Jara Field Office – 2,650 developable acres, up to 424 MW generation capacity.

Sources: Summarized from Draft and Final Solar PEIS for the SEZ (<http://blmsolar.anl.gov/sez/co/los-mogotes-east/>) with BLM Interdisciplinary Team input.

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? (Include justification)
		Avoidance	Minimization	
Acoustics Section 10.4.15 <sup>4</sup>	<p><b>Direct:</b> Increased noise levels during construction and operation of solar facilities with thermal energy storage (TES) could cause noise levels slightly exceeding the EPA guideline of 55 dBA at the nearest residences (about 0.4 mi [0.6 km] to the north and east), particularly for activities near the eastern SEZ boundary. The EPA guideline could also be exceeded due to operation of facilities with TES at the West Fork of the North Branch of the Old Spanish Trail (about 1.0 mi [1.6 km] to the east of the SEZ). A level of 55 dBA is similar to the noise of an air conditioning unit at 100 ft. Noise impacts during operation of PV facilities would be minimal.</p> <p><b>Indirect:</b> Based on Solar PEIS modeling, increased noise levels during construction and operations occurring near the southwestern SEZ boundary are not expected to affect terrestrial wildlife in the Los Mogotes ACEC.</p> <p><b>Cumulative<sup>5</sup>:</b> If multiple facilities were to be constructed close to the SEZ, residents and/or wildlife nearby could be affected by the noise generated, particularly at night when the noise is more discernible due to relatively low background levels.</p> <p><b>Data Gaps<sup>6</sup>:</b> Impacts on wildlife from construction noise needs to be considered on a project-specific basis. Refined modeling and background measurements would be needed.</p>	<p>Programmatic design features include a requirement that projects will be designed to locate solar facilities far enough away from residences, or include engineering and/or operational methods, such that county, state, and/or federal regulations for noise are not exceeded.</p> <p>See other programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Noise.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Noise.pdf</a></p>	<p>Programmatic design features include a requirement to limit the hours of daily activities, construct noise barriers if needed and practicable, and coordinate with nearby residents.</p> <p>See other programmatic design features at URL under Avoidance column.</p> <p>Additionally, recommend evaluation of construction timing restrictions in project-level NEPA alternatives to further minimize effects on wildlife (eg., no construction during breeding season or in winter use concentration areas/critical winter range).</p>	<p><u>Yes</u></p> <p><u>Cumulative effects to terrestrial wildlife, birds, bats.</u></p> <p><u>Generally impacts from solar development are expected to be temporary, localized, and readily mitigated.</u></p> <p>Technology used and onsite mitigation implemented would be primary driver of residual impact for full build-out of SEZ.</p>

<sup>1</sup> The impacts assessment assumed 80% of the SEZ area will be used for solar development.

<sup>2</sup> These columns give examples of avoidance and minimization measures that are specified in the Record of Decision for the Final Solar PEIS and will be required. Additional avoidance and minimization measures proposed by the BLM Interdisciplinary Team are listed and should be evaluated through project-specific environmental analyses. Monitoring is planned to verify the implementation and effectiveness of avoidance and minimization measures.

<sup>3</sup> Residual or unavoidable impacts are residual effects that cannot be adequately mitigated onsite by avoidance and/or minimization. Preliminary assessments are provided for comment.

<sup>4</sup> Section numbers are the same in both the Draft and Final Solar PEIS.

<sup>5</sup> Sections 10.4.22.4 of the Draft and Final Solar PEIS address cumulative impacts, which consider ongoing and reasonably foreseeable activities in the vicinity of the SEZ such as wind, geothermal, mining, agricultural, and commercial development; new roads, traffic, and off-highway vehicle use; and infrastructure such as transmission lines, and fences.

<sup>6</sup> Data gaps have not been identified for all resources in this table. Additional data gaps may be identified during future SEZ- or project-specific assessments.

**Comment [VJ1]:** BLM CO-NM Wildlife Biologist revised assessment based on landscape assessment conservation element and change agent models (December, 2014)

**Deleted:** Maybe (for wildlife). ¶

**Deleted:** of sensitive areas of the SEZ or avoidance of activities at certain times of year. **Avoidance and minimization measures that are specified in the Record of Decision for the Final Solar PEIS will be required.** Additional avoidance and minimization measures could be introduced during the Solar Regional Mitigation Strategy process for identified unavoidable impacts. Monitoring is planned to verify the implementation and effectiveness of design features. ¶

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Air Quality Section 10.4.13	<p><b>Direct:</b> Fugitive dust and equipment exhaust emissions during construction could result in exceedance of Ambient Air Quality Standards (AAQS) for particulate matter (PM) at SEZ boundaries. Specifically, predicted 24-hour PM<sub>10</sub> concentration levels could exceed AAQS at the nearest residence.</p> <p>Disturbance of soils (particularly subsurface calcic soils) may produce fugitive dust, which may result in exposure to respirable particulates and/or microbes (human health impacts).</p>	<p><a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Air_Quality_Climate.pdf">See programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Air_Quality_Climate.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Air_Quality_Climate.pdf</a></a></p>	<p>Programmatic design features include a requirement to implement dust suppression measures during construction and operations.</p> <p>See other programmatic design features at URL under Avoidance column.</p>	
	<p><b>Indirect:</b> Decreased visibility in nearby residential (as close as 0.4 mi [0.6 km] to the north and east) or specially-designated areas due to elevated PM levels from soil disturbance/grading during construction. Increased PM would also increase dust-on-snow accumulation, possibly changing stream runoff patterns. If used for dust abatement, magnesium chloride could be harmful to plants (due to increased chloride ions in runoff).</p>	<p><b>Additionally,</b> a Vegetation Management Plan <b>should be required that includes the maintenance of the maximum acreage of native vegetation cover practicable during construction and operation to avoid dust sources.</b></p> <p><a href="#">Avoiding construction during times of high dust emissions from other sources (e.g., agricultural plots) should also be considered.</a></p>	<p>Recommend evaluation of solar panel mounting and other disturbance minimizing technologies in project-level NEPA alternatives (e.g. no grading of the site, retention of maximum native vegetation, use of low emission vehicles, placing gravel on roads, use of "drive and crush" installation). Recommend revegetation of the SEZ with native vegetation to increase soil stability as a plan of development feature to further minimize the amount of grading and surface disturbance and promote reduced dust emissions and PM levels.</p>	<p>Yes:</p> <p>Level of site grading and disturbance to native vegetation would be primary driver of residual impact for full build-out of SEZ.</p>
	<p><b>Cumulative:</b> Los Mogotes East and Antonito Southeast SEZs are within about 12 mi (19 km) of each other; construction of solar facilities at the two SEZs could have cumulative impacts with respect to generation of PM. In addition, unpaved roads and agricultural practices could have cumulative impacts with respect to generation of PM. Over the long term and across the region, the development of solar energy may have beneficial impacts on air quality in the region.</p> <p><b>Data Gaps:</b> Monitoring for PM during all phases of development will be required to identify levels exceeding AAQS.</p>			

**Comment [VJ2]:**  
Deleted text below based on NRCS scoping during April-September (2014), field verification, documented state-line soil mapping uncertainty, wind erodibility characterization uncertainty and soil sensitivity at the Antonito SE SEZ.

**Deleted:** About 81% of soils in the SEZ have been characterized as having low potential for wind erosion; 19% have moderate potential for wind erosion. Therefore contributions to PM load from development would likely to be low to moderate.¶  
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**Deleted:** Programmatic design features for ecological resources include a requirement to develop

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**Deleted:** See other programmatic design features at [http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Air\\_Quality\\_Climate.pdf](http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Air_Quality_Climate.pdf)

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Climate Change Section 5.11.4 of DPEIS for soil storage capacity; 10.4.13 for emissions avoided	<p><b>Direct:</b> Possible impact through loss of carbon storage capacity of the soil (estimated at 100 g carbon/m<sup>2</sup>). Preliminary calculations show loss of CO<sub>2</sub> storage capacity as 1.6 tons/acre/yr (3,392 tons/yr for SEZ full build-out), less than 1% of the CO<sub>2</sub> emissions avoided by operation of a solar facility (see below).</p> <p><b>Positive impact:</b> Solar power generation reduces demand for energy from fossil fuels, and thereby reduces greenhouse gas emissions (from about 408,000-734,000 tons/yr CO<sub>2</sub> avoided at full buildout depending on technology).</p> <p><b>Indirect:</b> If PM is highly elevated and results in increased dust-on-snow accumulation effects of climate change may be exacerbated (through early and/or fast stream run-off coupled with decreased snowpack).</p> <p><b>Cumulative:</b> Over the long term, the development of solar energy contribute to reduced greenhouse gas emissions, if the development offsets electricity generation by fossil fuel plants). About 90% of electricity in CO is produced in fossil fuel plants.</p> <p><b>Data Gaps:</b> None identified.</p>	<p>See programmatic design features for vegetation at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf</a></p> <p><u>Additionally, a Vegetation Management Plan should be required that includes the maintenance of the maximum acreage of native vegetation cover practicable during construction and operation to avoid dust sources.</u></p>	<p>See programmatic design features at URL under Avoidance column.</p>	<p>No</p>

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Cultural Section 10.4.17	<p><b>Direct:</b> Direct impacts on eligible archaeological sites (if present) and on the West Fork of the North Branch of the Old Spanish Trail are possible (see data gaps).</p> <p><b>Indirect:</b> Impacts on significant cultural resources and cultural landscapes associated with American Latino heritage, such as within the Sangre de Cristo National Heritage Area, are possible throughout the San Luis Valley. <a href="#">Impacts on significant cultural resources and cultural landscapes associated with Native American groups are also possible.</a> Erosion impacts on the cultural landscape outside of the SEZ resulting from land disturbances and modified hydrologic pattern, increased accessibility and potential for damage to eligible sites outside of the SEZ (if present).</p> <p><b>Cumulative:</b> Dependent on whether eligible sites are found and impacted in the SEZ and adjacent areas.</p> <p><b>Data Gaps:</b> While no sites have been identified in the SEZ, many significant archaeological sites have been located in close proximity. A pre-development cultural inventory and evaluation will be completed, as part of the Section 106 consultation process. <a href="#">Further investigation of potential impacts to</a> the West Fork of the North Branch of the Old Spanish Trail is needed to determine its location, integrity, and the significance of portions of the Trail from which future potential development in the SEZ could be viewed.</p>	<p>Programmatic design features require that significant cultural resources clustered in specific areas which retain sufficient integrity will be avoided.</p> <p>Additionally, if adverse impacts are identified on the West Fork of the North Branch of the Old Spanish Trail as a result of a trail inventory, measures will be identified to prevent substantial interference and avoid any areas determined unsuitable for development.</p> <p>See other programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Cultural.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Cultural.pdf</a></p>	<p>Programmatic design features require that a Memorandum of Agreement will be developed and executed if eligible sites are discovered within the SEZ to determine how the eligible properties will be treated (avoided or mitigated to minimize impacts).</p> <p>See other programmatic design features at URL under Avoidance column.</p>	<p>Maybe.</p> <p><a href="#">The discovery of new cultural sites is always a possibility, and adequate mitigation would be dependent on the resources discovered and their relative significance in the region.</a> Residual impacts to be evaluated based on results of Cultural Landscape Assessment analyses and coordination with stakeholders (federal, state, and local agencies, tribes, and public).</p> <p><a href="#">In addition, impacts to non-renewable resources are both irretrievable and irreversible. Tribal consultation may present situations where data recovery or collection is not possible.</a></p>

**Deleted:** The discovery of new cultural sites is always a possibility, and adequate mitigation would be dependent on the resources discovered and their relative significance in the region.

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Ecology: Vegetation and Riparian Areas, Section 10.4.10	<p><b>Direct:</b> Development will adversely affect characteristic vegetation (e.g., shadscale, fourwing saltbush, and greasewood) through destruction and loss of habitat. Development will result in small impacts to the Inter-Mountain Basins Semi-Desert Shrub Steppe land cover type which comprises 99% of the SEZ. Sensitive habitats on the SEZ include ephemeral washes. Development, including vegetation removal, land clearing, grading, dust deposition, and lowered groundwater levels, may alter soils and vegetation communities.</p> <p><b>Indirect:</b> There may be loss of native vegetation outside the SEZ due to dust deposition from construction and operations, increased surface water runoff and related erosion, or through the introduction of invasive species.</p> <p><b>Cumulative:</b> Solar energy development could be a contributor to cumulative impacts on some vegetation communities, depending on the type, number, and location of other developments in the region.</p> <p><b>Data Gaps:</b> <u>None Identified.</u></p>	<p>SEZ-specific programmatic design features require that all dry wash habitats within the SEZ will be avoided to the extent practicable. A buffer area will be maintained around dry washes to reduce the potential for impacts on these habitats on or near the SEZ.</p> <p>See other programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf</a></p> <p>Additionally, <u>a Vegetation Management Plan should be required that includes the maintenance of the maximum acreage of native vegetation cover practicable, and compliance with applicable regulations and policies for the control of noxious weeds and invasive plant species, to maintain ecological integrity and decrease the probability of wildfires.</u></p>	<p>SEZ-specific programmatic design features require that appropriate engineering controls be used to minimize impacts on dry wash, and riparian habitats, including downstream occurrences, resulting from surface water runoff, erosion, sedimentation, altered hydrology, accidental spills, or fugitive dust deposition to these habitats. Maintaining sediment and erosion controls along drainages would reduce the potential for impacts on wetlands near or downgradient from the SEZ. Appropriate buffers and engineering controls will be determined through agency consultation.</p> <p>See other programmatic design features at URL under Avoidance column.</p> <p>Additionally, <u>solar panel mounting and other disturbance minimizing technologies (e.g., no grading of the site) should be evaluated in project-level NEPA alternatives..</u></p> <p>Also, If project-specific impacts to groundwater are identified, purchase of existing water rights must be used to offset groundwater use, with additional quantities above what is projected to be used purchased so the excess water can be retired and returned to the groundwater table.</p>	<p>Yes.</p> <p>Level of site grading and disturbance to native vegetation would be primary driver of residual impact for full build-out of SEZ.</p> <p><u>Development would result in direct removal or disturbance of native plant communities and the ecosystem services they provide.</u></p> <p><u>Many impacts to riparian areas can be mitigated onsite by avoiding development in riparian areas and by the installation of engineering controls on surface water runoff/erosion.</u></p>

- Deleted:** and result in the establishment of invasive species and noxious weeds within the SEZ
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Ecology - Invasive and Noxious Weeds Section 10.1.10	<p><b>Direct:</b> Development, including vegetation removal, land clearing, grading, dust deposition, and lowered groundwater levels, may alter soils and vegetation communities and result in the establishment of invasive species and noxious weeds within the SEZ. Some weeds of concern include henbane, whitetop, Russian napweed, and Canada thistle.</p> <p><b>Indirect:</b> There may be loss of native vegetation outside the SEZ due to the introduction of invasive species. Establishment of noxious weeds in the SEZ may result in spread of weeds to adjacent areas.</p> <p><b>Cumulative:</b> Solar energy development could be a contributor to cumulative impacts on some vegetation communities, depending on the type, number, and location of other developments in the region.</p> <p><b>Data Gaps:</b> Colonization rates of weed species.</p>	<p>See programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf</a></p> <p>Additionally, a Vegetation Management Plan should be required that includes the maintenance of the maximum acreage of native vegetation cover practicable, and compliance with applicable regulations and policies for the control of noxious weeds and invasive plant species (e.g., travel through weed-infested areas will be avoided; weeds will be treated, vehicles and machinery will be cleaned to remove weed seeds), to maintain ecological integrity and decrease the probability of wildfires.</p>	<p>See programmatic design features at URL under Avoidance column.</p> <p>Additionally, surveying and treating invasive weeds, including henbane, should be conducted along access roads to the SEZ, and solar panel mounting and other disturbance minimizing technologies (e.g., no grading of the site) should be evaluated in project-level NEPA alternatives.</p>	<p>Maybe, if weed management plan fails.</p> <p>Level of site grading and disturbance to native vegetation would be primary driver of residual impact for full build-out of SEZ.</p> <p>Onsite mitigation will reduce, but not eliminate, the potential for invasive species establishment. The degree of disturbance creates a significant opportunity for the establishment of invasive species and weeds.</p>

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**Comment [HH4]:** Added per specific comment from stakeholder at Alamosa workshop (except for henbane, which was specifically called out by Sam DesGeorges at Dec. review session)

**Comment [HH3]:** Note – this entire section was split out from the Vegetation/Riparian Areas section in response to Public Comments at Alamosa workshop.

**Comment [HH5]:** Added per specific comment from stakeholder at Alamosa workshop

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Ecology: Terrestrial Wildlife Section 10.4.11	<p><b>Direct:</b> Loss of habitat and connectivity for several species of amphibians, reptiles, birds, invertebrates, and mammals including big game species (black bear, bighorn sheep, cougar, elk, mule deer, pronghorn, bats). Ground disturbance, fugitive dust generated by project activities, noise, lighting, vegetation clearing, spread of invasive species, accidental spills, and harassment could impact wildlife within the SEZ, and may cause mortalities..</p> <p><b>Indirect:</b> Outside the SEZ, impacts could occur from habitat loss or modification related to groundwater depletions, surface runoff, dust, noise, lighting, or accidental spills. Potential for adverse impacts from new roads and increased traffic. Increased noise levels in the vicinity of the SEZ could result in disruption of breeding, migration, wintering, foraging, and other behavioral activities.</p> <p><b>Cumulative:</b> If development of solar facilities occurred at both Antonito Southeast and Los Mogotes SEZs, or if other actions occurred in the vicinity, there could be cumulative impacts on wildlife and aquatic biota habitat. Where projects are closely spaced, the cumulative impact on a particular species could be moderate to large.</p> <p><b>Data Gaps:</b> Impacts on terrestrial wildlife from construction and operational noise would have to be considered on a project-specific basis. <u>Research is needed on the required effective width of big game migration corridors through the Rio Grande del Norte National Monument and through the Los Mogotes East SEZ.</u></p>	<p>The following SEZ-specific programmatic design features for avoidance will be required:</p> <p>Wash habitats within the SEZ will be avoided to the extent practicable.</p> <p>Prairie dog colonies (if present) will be avoided to the extent practicable; doing so would reduce impacts on associated mammalian and avian species such as desert cottontail, burrowing owl, and thirteen-lined ground squirrel.</p> <p>Construction will be curtailed during winter when big game species are present.</p> <p>Development will avoid any additional wetlands identified during future site-specific fieldwork.</p> <p>See other programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf</a></p>	<p>The following SEZ-specific programmatic design features for minimization will be required:</p> <p>Disruptions during lambing/calving/fawning season for big game (such as bighorn sheep/elk/pronghorn) will be minimized.</p> <p>Appropriate engineering controls will be used to minimize impacts on palustrine wetlands surrounding the SEZ resulting from surface water runoff, erosion, sedimentation, accidental spills, or fugitive dust deposition to these habitats.</p> <p>Where big game winter ranges intersect or are close to the SEZ, use of motorized vehicles and other human disturbances will be controlled (e.g., through road closures or seasonal restrictions).</p> <p><u>Fencing around the solar energy development should not block the migratory corridors of mammals, particularly big game species.</u></p> <p><u>See endnote.</u><sup>1</sup></p>	<p>Yes.</p> <p>Level of site grading and disturbance to native vegetation would be primary driver of residual impact to functional habitat for full build-out of SEZ.</p> <p><u>Little can be done onsite to mitigate the loss of up to 2,650 acres of general wildlife habitat.</u></p>

**Comment [HH8]:** Removed "facility extent" because impact assessment assumes full build out (i.e., 80% of SEZ area is developed).

**Deleted:** Facility extent and I

**Comment [HH7]:** Added per stakeholder (DoW) comment.

Note also that some text was moved to an endnote.

**Comment [HH6]:** Text added on the basis of stakeholder comment during the Alamosa workshop.

**Deleted:** Undisturbed buffer areas and sediment and erosion controls will be maintained around drainages associated with wetland areas located in the immediate vicinity of the SEZ. ¶  
¶ See other programmatic design features at URL under Avoidance column.

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Ecology: Migratory Birds Section 10.4.11.2	<p><b>Direct:</b> Loss of habitat and connectivity for several species. Noise, lighting, and vegetation clearing could impact migratory birds overflying, migrating, or using the SEZ or nearby wetlands. There is potential for migratory birds to be attracted to solar arrays (because solar panels may appear to be water or wetlands and may attract insects), resulting in collisions with solar arrays that cause injuries or fatalities. Migratory birds may be behaviorally susceptible to flight collision with solar arrays in the San Luis Valley wetlands landscape. Avian injury or fatality from collision with solar arrays is a particular risk at Los Mogotes East SEZ due to the location of the SEZ in migratory bird paths. For power tower facilities, burning of wings in the solar radiation field between heliostats and power towers has been observed.</p> <p><b>Indirect:</b> Outside the SEZ, impacts could occur from habitat loss or modification related to groundwater depletions, or habitat loss or modification through the introduction of invasive species. Establishment of noxious weeds in the SEZ may result in spread of weeds to adjacent areas. Increased noise levels in the vicinity of the SEZ could result in disruption of breeding, migration, wintering, foraging, and other behavioral activities.</p> <p><b>Cumulative:</b> Impacts to migratory birds could occur, depending on the number and location of other developments in the region.</p> <p><b>Data Gaps:</b> Additional research needed on solar development impacts on migratory birds <u>and how far such impacts would extend away from the SEZ</u>. Impacts on migratory birds from construction and operational noise would have to be considered on a project-specific basis.</p>	<p>SEZ-specific programmatic design features require that if present, prairie dog colonies (which could provide habitat or food resources for some bird species) will be avoided to the extent practicable; doing so would reduce impacts on associated bird species such as raptors.</p> <p>See other programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf</a></p> <p><u>Developers also should consider the applicability of guidelines developed by the Avian Power Line Interaction Council.</u></p>	<p>See programmatic design features at URL under Avoidance column.</p> <p>Additionally, recommend evaluation of construction timing restrictions in project-level NEPA alternatives to further reduce impacts. Timing limitation should be enforced from May 15-July 15 for any surface disturbing activities to protect migratory bird nesting and brood rearing,</p> <p>Raptor nest surveys should be conducted within a 0.5 mile radius of the project site, if any raptor nests are located, appropriate timing limitations should be applied.</p> <p>Migratory bird monitoring in the Los Mogotes East SEZ should be conducted.</p>	<p>Yes.</p> <p><u>Some level of bird injury/fatality has been observed for all types of solar facilities (through collisions with equipment or from burns). Research is ongoing to quantify impacts and identify effective mitigation measures.</u></p>

**Deleted:** Level of site grading and disturbance to native vegetation would be primary driver of residual impact for full build-out of SEZ.

**Comment [HH10]:** Added in response to specific stakeholder comment during the Alamosa workshop

**Comment [HH9]:** Added this text in response to stakeholder comment during the Alamosa workshop

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - To what degree are impacts likely to be mitigated onsite?		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? (Include justification)
		Avoidance	Minimization	
Ecology: Plant Special Status Species Section 10.4.12	<p><b>Direct:</b> Ground disturbance, land clearing and grading, fugitive dust generated by project activities, and the spread of invasive species would result in loss of special status plant species habitat, if present, and might result in loss of individual plants. See also impact summary above under <b>Vegetation and Riparian Areas</b>. No Endangered Species Act (ESA)-listed or BLM Colorado-listed plant species have been identified that have suitable habitat within the SEZ.</p> <p><b>Indirect:</b> Indirect impacts to individuals and habitat outside of the SEZ could occur from groundwater depletions, surface runoff, dust, or accidental spills. BLM local biologists indicate that suitable habitat for 2 BLM-sensitive plant species, including the <b>rock-loving aletes<sup>7</sup></b> and <b>Ripley's milkvetch</b> occur within 5 mi (8 km) of the SEZ boundary.</p> <p><b>Cumulative:</b> There could be cumulative impacts on some special status plant species due to habitat destruction and overall development and fragmentation of the area.</p> <p><b>Data Gaps:</b> Although habitat for listed species has not been identified within the SEZ, pre-disturbance surveys are required to identify the presence and abundance of special status species.</p>	<p>The following programmatic design features for avoidance will be required:</p> <p>Based on data from pre-disturbance surveys, disturbance to occupied habitats will be avoided to the extent practicable, per BLM Manual 6840.</p> <p>Disturbance to wetland and riparian habitats within the SEZ will be avoided or minimized to the extent practicable.</p> <p>See other programmatic design features at <a href="http://blmsolar.arl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf">http://blmsolar.arl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf</a></p> <p>See also avoidance measures listed for Vegetation and Riparian Areas, which would apply for Plant Special Status Species as well.</p>	<p>The following programmatic design features for minimization will be required:</p> <p>If avoidance is not possible for some species, translocation of individuals from areas of direct effects or compensatory mitigation (for example, through seed collection or reseeding at an appropriate offsite location) may be employed.</p> <p>Groundwater withdrawals will be avoided or limited to reduce impacts on groundwater-dependent special status species, including those species that may occur in riparian or aquatic habitats supported by groundwater.</p> <p>See other programmatic design features at URL under Avoidance column.</p> <p>See also minimization measures listed for Vegetation and Riparian Areas, which would apply for Plant Special Status Species as well.</p>	<p><u>Yes</u></p> <p><a href="#">Populations of Ripley's milkvetch, BLM Sensitive Plant Species, <i>Astragalus ripleyi</i> have documented occurrence on lands and soils adjacent to the Los Mogotes SEZ. Developing 80% of both Los Mogotes and Antonito SE SEZs would be expected to result in a total loss to habitat or plants occurring there.</a></p> <p>Level of site grading and disturbance to native vegetation would be primary driver of residual impact for full build-out of SEZ.</p> <p><a href="#">Development in the SEZ would result in alteration of up to 2,650 acres of habitat if present, little can be done onsite to mitigate the loss of special status plant species that may be present within the SEZ. Avoidance of individual plants may not be practical.</a></p>

**Comment [VJ11]:** BLM CO-NM Natural Resource Biologist revised assessment based on landscape assessment conservation element and change agent models and extent of *Atriplex* habitat (December, 2014)

**Deleted:** Maybe. ¶

<sup>7</sup> Species in bold text have been recorded or have designated critical habitat within 5 mi (8 km) of the SEZ boundary.

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
<p><b>Ecology:</b> <b>Animal Special Status Species</b> Section 10.4.12</p>	<p><b>Direct:</b> Ground disturbance, land clearing and grading, and fugitive dust generated by project activities would result in loss of special status animal species habitat, if present, and might result in loss of individual animals. See also impact summaries above under <b>Terrestrial Wildlife and Migratory Birds</b>. Development on the SEZ could directly disturb individuals or habitat for seven BLM Colorado sensitive special status animal species, including the <b>Mountain plover</b><sup>8</sup>, big free-tailed bat, and Gunnison's prairie dog.</p> <p><b>Indirect:</b> Indirect impacts to individuals and animal habitat outside of the SEZ could occur due to groundwater depletions, surface runoff, dust, noise, lighting, or accidental spills. Potential for adverse impacts from new roads and increased traffic. Suitable habitat for one additional ESA Candidate Species (Western yellow-billed cuckoo), one additional ESA Threatened species (Mexican Spotted owl), one additional ESA-listed endangered species (Southwestern willow flycatcher), one additional species proposed for listing under the ESA as endangered (New Mexico jumping mouse), and eight additional BLM-sensitive animal species (including the <b>Rio Grande chub</b>, Rio Grande cutthroat trout, <b>Ferruginous Hawk</b>, and several migratory waterfowl and shorebirds) occurs within 5 mi (8 km) of the SEZ boundary.</p> <p><b>Cumulative:</b> There could be cumulative impacts on some special status animal species due to habitat destruction and overall development and fragmentation of the area.</p> <p><b>Data Gaps:</b> Pre-disturbance surveys are required to identify the presence and abundance of special status species.</p>	<p>The following programmatic design features for avoidance will be required:</p> <p>Based on data from pre-disturbance surveys, disturbance to occupied habitats will be avoided to the extent practicable (per BLM Manual 6840).</p> <p>Avoidance or minimization of disturbance to wetland and riparian habitats within the SEZ will be employed to reduce impacts on the New Mexico jumping mouse, Rio Grande chub, Rio Grande cutthroat trout, Rio Grande sucker, milk snake, bald eagle, Barrow's goldeneye ferruginous hawk, southwestern willow flycatcher, and western yellow-billed cuckoo.</p> <p>See other programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Ecological_Resources.pdf</a></p> <p>See also avoidance measures listed for Terrestrial Wildlife and Migratory Birds, which would apply for Animal Special Status Species as well.</p>	<p>The following programmatic design features for minimization will be required:</p> <p>If avoidance is not possible for some species, augmentation, reintroduction, or translocation of individuals from areas of direct effects or compensatory mitigation may be employed.</p> <p>Groundwater withdrawals will be avoided or limited to reduce impacts on groundwater-dependent special status species, including those species that may occur in riparian or aquatic habitats supported by groundwater, including the southwestern willow flycatcher and the western yellow-billed cuckoo.</p> <p><u><a href="#">See endnote.ii</a></u></p>	<p>Yes. <u>Level of site grading and disturbance to native vegetation would be primary driver of residual impact to functional habitat for full build-out of SEZ.</u></p>

**Comment [HH12]:** Removed "facility extent" because impact assessment assumes full build out (i.e., 80% of SEZ area is developed).

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<sup>8</sup> Species in bold text have been recorded or have designated critical habitat within 5 mi (8 km) of the SEZ boundary.

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
Environmental Justice Section 10.4.20	<p><b>Direct:</b> Disturbance of soils (particularly subsurface calcic soils) may produce fugitive dust, which may result in exposure to respirable particulates and/or microbes (human health impacts).</p> <p>Based on guidelines from the Council on Environmental Quality, there are low income and minority populations within a 50-mile (80-km) radius and downwind of the SEZ, notably in the communities of Romeo, La Jara, and Manassa, as well as other outlying communities. Adverse impacts to low income and/or minority communities could result from degraded air quality and increased exposure to particulates generated at the SEZ by solar development.</p> <p><b>Indirect:</b> None identified.</p> <p><b>Cumulative:</b> Contributions from solar development would likely be small, and would not be expected to significantly contribute to cumulative impacts on minority and low income populations within the 50-mi geographic extent of effects.</p> <p><b>Data Gaps:</b> None identified.</p>	<p>See programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Environmental_Justice.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Environmental_Justice.pdf</a></p> <p><u>In addition, a Vegetation Management Plan should be required that includes the maintenance of the, maintain maximum acreage of native vegetation cover practicable during construction and operation to avoid dust sources.</u></p>	<p>Programmatic design features for air quality include a requirement to implement dust suppression measures during construction and operations.</p> <p>See other programmatic design features at URL under Avoidance column.</p> <p><u>Recommend evaluation of solar panel mounting and other disturbance minimizing technologies in project-level NEPA alternatives as a minimization measure to reduce potential for air quality impacts of fugitive dust (e.g. no grading of the site, retention of maximum native vegetation, use of low emission vehicles, placing gravel on roads, use of "drive and crush" installation).</u></p>	<p>Maybe.</p> <p><u>Dependent on level of exposure of sensitive populations to fugitive dust generated by solar development, Will need to assess whether dust levels are effectively minimized by avoidance and minimization measures discussed under Air Quality and Vegetation.</u></p>

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**Comment [VJ13]:** Added based on stakeholder comments during Sep 2014 field visit Antonito SE SEZ

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - To what degree are impacts likely to be mitigated onsite?		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? (Include justification)
		Avoidance	Minimization	
Hydrology: Surface Water and Water Quality Section 10.4.9	<p><b>Direct:</b> Land clearing, land leveling, vegetation removal, and spills and runoff associated with development of the SEZ have the potential to alter flow routing, change surface runoff, reduce infiltration/recharge, cause loss of ephemeral stream networks, reduce evapotranspiration rates, increase sediment transport (by water), change sediment transport (by wind), and degrade water quality.</p> <p>No permanent surface water bodies are located on Los Mogotes East SEZ. Several ephemeral washes drain across the site in a west to east direction. Disturbance to intermittent/ephemeral stream channels within the Los Mogotes East SEZ should not have a significant impact on the critical functions of groundwater recharge, sediment transport, flood conveyance, and ecological habitat, given the relatively small footprint of the SEZ with respect to the study area.</p> <p><b>Indirect:</b> Indirect impacts from development and groundwater use on ephemeral and perennial surface water features could occur.</p> <p><b>Cumulative:</b> Alterations to ephemeral stream networks can alter groundwater recharge and surface runoff processes potentially impacting the basin-scale water balance and water quality aspects of water features receiving surface runoff.</p> <p><b>Data Gaps:</b> None identified.</p>	<p><a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Water.pdf">See programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Water.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Water.pdf</a></a></p> <p><u>In addition</u>, a Vegetation Management Plan <u>should be required that includes the maintenance if the</u> maximum acreage of native vegetation cover practicable during construction and operation, and <u>minimization of land</u> disturbance in ephemeral washes and dry lakebeds.</p> <p><u>To</u> avoid any impact to downstream properties, project-level NEPA alternatives should evaluate maintenance of existing flow patterns at the site boundary, by avoiding ephemeral drainages and/or providing detention and/or retention facilities. Detention can be provided on the SEZ to capture the volume of flow that is represented by the increase between existing and proposed conditions. Retention would be utilized to capture all the additional flow volume with little to no overland surface water releases.</p>	<p>See programmatic design features at URL given under Avoidance column.</p> <p>See additional surface water impact <a href="#">avoidance and</a> minimization measure recommendations in BLM Solar Energy Zone Hydrology – Los Mogotes East SEZ (TetraTech, August, 2013).</p>	<p><a href="#">Yes</a></p> <p><a href="#">Development of the SEZ may alter ephemeral stream channels that can impact runoff and groundwater recharge.</a></p> <p><a href="#">Reductions to the connectivity of these areas with surface waters and groundwater could limit water availability and thus alter the ability of the area to support vegetation growth and diversity, generating critical habitat areas and connecting wildlife corridors.</a></p>

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**Comment [VJ14]:** BLM CO Hydrologist revised assessment (December, 2014)

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Dependent on level of retention of native plant cover.

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Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - To what degree are impacts likely to be mitigated onsite?		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? (Include justification)
		Avoidance	Minimization	
Hydrology: Groundwater Quality And Groundwater Availability Section 10.4.10	<p><b>Direct:</b> Los Mogotes East SEZ is located in the Rio Grande Basin. Groundwater withdrawals for development may cause declines in groundwater elevations that can impact water availability for surface water features, vegetation, ecological habitats, regional groundwater flow paths, and other groundwater users in the basin.</p> <p>Spills associated with development of the SEZ have the potential to degrade groundwater quality.</p> <p><b>Indirect:</b> Groundwater withdrawals for solar energy facilities have the potential to affect other groundwater users in the basin.</p> <p><b>Cumulative:</b> Groundwater depletion has continued in the San Luis Valley aquifer system since 1950 due to withdrawal for agricultural and other purposes. Groundwater use for solar energy development may result in additional use of groundwater. However, the strict management of water resources in the Rio Grande Basin acts to ensure that any impacts from a new water use would continue to be equivalent to or less than those from current uses and that no net increase in the total amount of water used would occur.</p> <p><b>Data Gaps:</b> None identified.</p>	<p>Groundwater use analyses suggest that full build-out of wet-cooled technologies is not feasible.</p> <p>See other programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Water.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Water.pdf</a></p> <p>Additionally, if project-specific impacts to groundwater are identified, purchase of existing water rights must be used to offset groundwater use, with additional quantities above what is projected to be used purchased so the excess water can be retired and returned to the groundwater table.</p> <p>See additional groundwater impact avoidance measures including detention and retention facility location recommendations in BLM Solar Energy Zone Hydrology – Los Mogotes East SEZ (TetraTech, August 2013)</p>	<p>Programmatic design features require that, for mixed-technology development scenarios, any proposed projects would have to reduce water requirements to a level sufficient to secure water rights and comply with water management in the San Luis Valley.</p> <p>Augmentation/compensation is required by the State of Colorado.</p> <p>See other programmatic design features at URL under Avoidance column.</p>	<p><u>Yes</u></p> <p><u>The nature of the solar technology deployed will dictate water requirements. Onsite mitigation will reduce, but will not eliminate the need for water.</u></p> <p><u>Dependent on compensation requirements and on the water demands of the development and whether the subsurface hydrology is affected.</u></p>

**Comment [VJ15]:** BLM CO Hydrologist revised assessment (December, 2014)

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Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
Lands & Realty Section 10.4.2	<p><b>Direct:</b> Development of the SEZ could disturb 2,650 acres (10.7 km<sup>2</sup>). Two roads cross the area and provide access to a well-blocked area of public land west of the proposed SEZ. Access routes to lands west of the SEZ could be affected by solar energy development if legal access through the SEZ is not maintained (also a recreation issue).</p> <p><b>Indirect:</b> Increased traffic and increased access to previously remote areas also could change the overall character of the landscape. <a href="#">Public land availability to solar developers under constrained regional transmission infrastructure and power purchase agreement markets could conceivably indirectly impact private land markets and county revenues.</a></p> <p><b>Cumulative:</b> The contribution to cumulative impacts of utility-scale solar projects on public lands on and around the Los Mogotes SEZ could be significant, particularly if the SEZ is fully developed with solar projects.</p> <p><b>Data Gaps:</b> None identified.</p>	See programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Lands_and_Realty.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Lands_and_Realty.pdf</a>	See programmatic design features at URL under Avoidance column.	<p>No.</p> <p><u>By regulation, any new activity must occur in deference to existing rights. Thus, potential impacts have been avoided.</u></p>

**Comment [VJ16]:** Added in response to specific stakeholder comment during the Antonito SE Field Visit

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
Livestock Grazing Section 10.4.4.1	<p><b>Direct:</b> Portions of three seasonal grazing allotments, Capulin, Little Mogotes and Ciscom Flats would be lost (3%, 6%, and 38%, respectively). It is estimated in the Solar PEIS that solar development in the SEZ would result in a total loss of 188 animal unit months of forage per year. There are also livestock management facilities, including fences and watering places in the SEZ. Permittees would be reimbursed for their portion of the value of these range improvements; however, this would not completely cover their economic loss. The loss of use of the Ciscom Flats grazing permit could result in a significant adverse economic impact on the permittee, and also, possibly an adverse social impact, since for many permittees, operating on public lands has been a longstanding tradition. Permittees would lose the ability to sell the allotments. County would lose tax revenues (minor impact). BLM would also lose some revenue.</p> <p><b>Indirect:</b> None identified.</p> <p><b>Cumulative:</b> Other development in the area of the SEZ could result in cumulative impacts on grazing. Big horn sheep grazing in conjunction with solar development could adversely affect sheep allotments.</p> <p><b>Data Gaps:</b> None identified.</p>	See programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Rangeland_Resources.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Rangeland_Resources.pdf</a>	See programmatic design features at URL under Avoidance column.	<p>Yes.</p> <p><u>If development occurs within existing grazing allotments, little can be done onsite to mitigate the loss to the allotments and the loss of grazing.</u></p> <p>Residual impacts to be evaluated based on locations of development within the SEZ and project-level NEPA.</p>
Military & Civilian Aviation Section 10.4.6	<p><b>Direct:</b> There are no identified military or civilian aviation uses in close proximity to the SEZ; therefore, there are likely no impacts.</p> <p><b>Indirect:</b> None identified.</p> <p><b>Cumulative:</b> Cumulative impacts would be small.</p> <p><b>Data Gaps:</b> None identified.</p>	See programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Military_Civilian_Aviation.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Military_Civilian_Aviation.pdf</a>	<p>Coordination with the military will be required on a project-specific basis to ensure that solar facilities do not interfere with operations.</p> <p>See other programmatic design features at URL under Avoidance column.</p>	<p>No.</p> <p><u>In comments on the Solar PEIS, the military indicated that at that time it had no concerns about potential impacts on its activities associated with solar development.</u></p>

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
<b>Minerals</b> Section 10.4.8 and Section 10.4.24 of the Final PEIS	<p><b>Direct:</b> The SEZ does not contain existing oil and gas leases, mining claims, or geothermal leases. The SEZ has been withdrawn from receiving new mining claims for a period of 20 years, precluding impacts from many types of mining activities.</p> <p><b>Indirect:</b> None identified.</p> <p><b>Cumulative:</b> None identified.</p> <p><b>Data Gaps:</b> None identified.</p>	Not applicable	Not applicable	No

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Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
Native American Concerns Section 10.4.18	<p><b>Direct:</b> It is likely that some plants traditionally important to Native Americans will be destroyed and that habitat of traditionally important animals will be lost.</p> <p><b>Indirect:</b> Indirect visual and auditory impacts are possible. For example, it is possible that there will be Native American concerns about potential visual effects and the effects of noise from solar energy development in the SEZ on Blanca Peak. There would be general habitat loss with vegetation clearing and water reduction that could affect plant and wildlife species and ecosystem health. No impacts from disturbance during project development would likely occur to known culturally significant areas (i.e., San Luis Lakes and the Great Sand Dunes).</p> <p><b>Cumulative:</b> Impacts on significant cultural resources and cultural landscapes associated with Native American groups are possible. The viewsheds of Los Mogotes Peaks and San Antonio Mountain, both significant to the Ute and Jicarilla Apache Tribes, may be impacted. It is possible that the development of utility-scale solar energy projects in the SEZ, when added to other potential projects likely to occur in the area, could contribute cumulatively to visual impacts in the valley as viewed from Blanca Peak and to the loss of traditionally important plant species and animal habitat.</p> <p><b>Data Gaps:</b> Government-to-government consultation will be required to determine issues of Native American concern.</p>	<p>The following SEZ-specific programmatic design features for avoidance will be required:</p> <p>Known human burial sites and rock art (panels of petroglyphs and/or pictographs) will be avoided. Where there is a reasonable probability of encountering undetected human remains and associated funerary objects by a solar project, the BLM will carry out discussions with Indian tribes before the project is authorized, in order to provide general guidance on the treatment of any cultural items that might be exposed.</p> <p>Visual intrusion on sacred sites will be avoided to the extent practicable.</p> <p>Springs and other water sources that are or may be sacred or culturally important will be avoided to the extent practicable. Culturally important plant and wildlife species will be avoided to be extent practicable.</p> <p>See other programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Native_American_Concerns.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Native_American_Concerns.pdf</a></p>	<p>See programmatic design features at URL under Avoidance column.</p>	<p>Yes.</p> <p>Residual impacts to be evaluated based on results of Cultural Landscape Assessment analyses and coordination with tribes.</p>

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
Paleontology Section 10.4.16	<p><b>Direct:</b> Impacts on significant paleontological resources in the PFYC Class 1 areas are unlikely. In the PFYC Class 4/5 areas, impacts on significant paleontological resources have a greater potential to occur.</p> <p><b>Indirect:</b> The potential for impacts from looting or vandalism is unknown, but unlikely as any such resources would be below the surface and not readily accessed.</p> <p><b>Cumulative:</b> The SEZ has a low to undetermined potential for paleontological resources. Therefore, will not likely be a cumulative impact on paleontological resources.</p> <p><b>Data Gaps:</b> A more detailed look at the geological deposits is necessary to determine whether a paleontological survey is warranted.</p>	<p>SEZ-specific programmatic design features require that PFYC Class 4/5 areas be avoided to the extent possible for development within the SEZ. Where avoidance of Class 4/5 deposits is not possible, a paleontological survey would be required.</p> <p>See <u>other</u> programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Paleo.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Paleo.pdf</a></p>	<p>Programmatic design features require that the BLM be notified immediately upon discovery of fossils. Work will be halted at the fossil site and continued elsewhere until qualified personnel, such as a paleontologist, can visit the site, determine the significance of the find, and, if significant, make site specific recommendations for collection or other resource protection.</p> <p>See other programmatic design features at URL under Avoidance column.</p>	<p>No.</p> <p><u>Any paleontological resources that are discovered will be preserved.</u></p>

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
Recreation Section 10.4.5	<p><b>Direct:</b> Solar development will preclude current recreational activities that may occur within the SEZ boundary. Vehicle routes currently open within the SEZ could be closed or rerouted. Access routes to lands west of the SEZ could be affected by solar energy development if legal access through the SEZ is not maintained (also a lands and realty issue).</p> <p>The SEZ will be readily visible to travelers on U.S. 285 and on the Los Caminos Antiguos Scenic Byway. Only a small impact to pronghorn antelope hunting is likely because only a small portion of available habitat occurs within the SEZ.</p> <p><b>Indirect:</b> Indirect effects would occur primarily on lands near the solar facilities and would result from the change in the overall character of undeveloped BLM-administered lands to an industrialized, developed area, displacing people who are seeking more rural or primitive surroundings for recreation. Great Sand Dunes National Park and Preserve, the Old Spanish National Historic Trail, two scenic railroads, the Los Caminos Antiguos Scenic Byway, the Sangre de Cristo Mountains, three national wildlife refuges, and numerous designated wilderness areas are among the highlights of the recreational and tourism opportunities of the area.</p> <p>Because the route of the West Fork of the North Branch of the Old Spanish Trail is so near the SEZ, it is anticipated that the viewshed of the Trail would be adversely affected and the potential future recreational attraction of the Trail might be reduced. However, the integrity and historical significance of the portion of the Trail near to the SEZ remain undetermined.</p> <p><b>Cumulative:</b> Multiple developments in the vicinity of the SEZ could cumulatively reduce recreational opportunities.</p> <p><b>Data Gaps:</b> None identified.</p>	See programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Public_Access_and_Recreation.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Public_Access_and_Recreation.pdf</a>	<p>SEZ-specific programmatic design features require that as projects are proposed for the SEZ, the potential impacts on tourism will be considered and reviewed with local community leaders.</p> <p><u>If vehicle routes currently open within the SEZ are closed or rerouted, alternative routes may be established.</u></p> <p>See other programmatic design features at URL under Avoidance column.</p>	<p>Maybe.</p> <p><u>Depends on mitigation measures implemented on the basis of project-level NEPA.</u></p> <p><u>Relatively little recreation currently occurs in the SEZ. If new vehicle routes are established, a NEPA analysis would be required for those routes.</u></p>

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Comment [HH17]: New input from ID Team

Comment [HH18]: New input from ID Team

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - To what degree are impacts likely to be mitigated onsite?		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? (Include justification)
		Avoidance	Minimization	
Socioeconomics Section 10.4.19	<p>Direct: Impacts on the local economy as a result of expenditures of wages and salaries and the collection of state sales and income taxes. From 88 to 1,160 direct construction jobs and 5 to 92 direct operations jobs could be created (least for PV; most for parabolic trough facilities). Adverse impacts, including county and/or state government costs, could occur locally or regionally due to the need for services for new workers during project construction and operation (e.g., housing, police, fire-fighters).</p> <p>Indirect: From 66 to 879 indirect construction jobs and 2 to 53 indirect operations jobs could be created. Positive impacts from project wages and salaries, and tax revenues subsequently circulating through the economy would be minor. Loss of livestock grazing could result in the future loss of jobs and a decline in grazing fees payable to the BLM and the county. <a href="#">Public land availability to solar developers under constrained regional transmission infrastructure and power purchase agreement markets could conceivably indirectly impact private land markets and county revenues</a>. <a href="#">Water requirements for Antonito SEZ solar development would represent a new industrial use in a Colorado water resource sub-district in the Conejos River basin that is currently constrained and under review in State of Colorado water court. New utility-scale uses could indirectly affect agricultural water users and markets.</a></p> <p><a href="#">If hunting in or near the SEZ declines due to solar development, there could be a loss of revenue to the State due to fewer issued hunting licenses.</a></p> <p>Cumulative: Beneficial impacts overall would include creation of additional jobs and income. The negative impacts, including some short-term disruption of rural community quality of life, would likely be short-term and/or specific to individual projects on the SEZ.</p> <p>Data Gaps: None identified.</p>	<p>See programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Socioeconomics.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Socioeconomics.pdf</a></p>	<p>See programmatic design features at URL under Avoidance column.</p> <p><a href="#">Onsite mitigation could include requiring developers to secure agreements for local government services as a condition of "Notice to Proceed".</a></p>	<p>Maybe.</p> <p>For grazing impacts, depending on mitigation measures implemented on the basis of project-level NEPA.</p> <p><a href="#">No shared revenue to state and local government from federal land rental and MW usage fees under current federal law and regulations</a></p>

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- Comment [VJ22]: Added in response to specific multi-county input.
- Comment [HH21]: Added in response to specific stakeholder comment during the Alamosa workshop
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Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
Soils/Erosion Section 10.4.7	<p><b>Direct:</b> Impacts on soil resources would occur mainly as a result of ground-disturbing activities (e.g., grading, excavating, and drilling), especially during the construction phase of a solar project. These include soil compaction, soil horizon mixing, soil erosion and deposition by wind, soil erosion by water and surface runoff, sedimentation, and soil contamination. Soils within the SEZ are predominantly very stony and cobbly loams of the Travelers and Garita Series, which now make up about 95% of the soil coverage at the site. Soil loss through sediment transport may occur. Soil contamination from spills could occur.</p> <p>Disturbance of soils (particularly subsurface calcic soils) may produce fugitive dust.</p> <p><b>Indirect:</b> Disturbance of soil can lead to introduction of invasive species. Elevated PM levels could result from soil disturbance/grading activities during construction.</p> <p><b>Cumulative:</b> Cumulative impacts would occur from the disturbance of several large renewable energy projects, connecting linear facilities, and other projects in the vicinity of the SEZ, but would be limited through the application of design features.</p> <p><b>Data Gaps:</b> None identified.</p>	<p>See programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Soil_Geologic_Hazards.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Soil_Geologic_Hazards.pdf</a></p> <p><u>In addition, a Vegetation Management Plan should be required that includes the maintenance of the maximum acreage of native vegetation cover practicable during construction and operation to avoid dust sources.</u></p>	<p>See programmatic design features at URL under Avoidance column.</p>	<p>Yes.</p> <p>Level of site grading would be primary driver of residual impact for full build-out of SEZ.</p> <p><u>Little can be done to mitigate the loss of up to 2,650 acres of soil. Avoidance (not developing some areas) will reduce the acreage and soil stabilization measures can reduce soil erosion post disturbance.</u></p>

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**Comment [VJ23]:** Deleted text based on NRCS scoping during April-September (2014), field verification, wind erodibility characterization uncertainty and soil sensitivity at the Los Mogotes SEZ.

**Deleted:** About 81% of soils in the SEZ have been characterized as having low potential for wind erosion; 19% have moderate potential for wind erosion. Therefore, increased wind erosion may be low to moderate if grading occurs.¶

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Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - To what degree are impacts likely to be mitigated onsite?		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? (Include justification)
		Avoidance	Minimization	
Specially Designated Areas and Lands with Wilderness Characteristics Section 10.4.3	<p><b>Direct:</b> Specially designated areas (SDAs) within 25 mi (40 km) of the SEZ that could be impacted by solar development include the following: Alamosa National Wildlife Refuge, South San Juan Wilderness Area (WA), Cruces Basin WA, San Luis Hills Area of Critical Environmental Concern (ACEC), Los Mogotes ACEC, Cumbres &amp; Toltec Scenic Railroad (CTSR) ACEC, San Antonio Gorge ACEC, San Luis Hills Wilderness Study Area (WSA), San Antonio WSA, roadless areas in the Rio Grande and Carson National Forests, Los Caminos Antiguos Scenic Byway, Sangre de Cristo National Heritage Area (NHA), and the West Fork of the North Branch of the Old Spanish Trail.</p>	<p><a href="#">Programmatic design features require analysis of lands that have been identified in a citizen's wilderness proposal to determine whether they possess wilderness characteristics. All work must be completed in accordance with current BLM policies and procedures.</a></p>		<p>Yes.</p> <p>Residual impacts to be evaluated based on locations of development within the SEZ and project-level NEPA.</p> <p><a href="#">For visual impacts, full development of the SEZ with solar facilities would cause moderate to strong visual contrasts that could not be hidden from view from the specially designated areas.</a></p>
	<p>Moderate to strong visual contrasts could be experienced in the San Luis Hills WSA and ACEC, and along the Los Caminos Antiguos Scenic Byway and portions of the West Fork of the North Branch of the Old Spanish Trail. There may also be moderate visual contrasts for some viewpoints within the newly designated Rio Grande del Norte National Monument. Impacts could include adverse visual effects on the viewshed (including impacts on night sky viewing and annoyance from glint and glare), reduced recreation use, fragmentation of biologically linked areas, and loss of public access.</p>	<p><a href="#">Additionally, programmatic design features for lands with wilderness characteristics include a requirement to consider options to avoid, minimize, and/or mitigate impacts as part of the project-specific environmental impact analysis, in coordination with the BLM.</a></p>	<p>SEZ-specific programmatic design features require that early consultation be initiated with the entity responsible for developing the management plan for the Sangre de Cristo NHA, in order to understand how development of the SEZ could be consistent with NHA plans and goals.</p>	
	<p>A recent <a href="#">BLM</a> inventory of <a href="#">lands with wilderness characteristics (LWC)</a> within the SEZ found that these lands do not contain wilderness characteristics. <a href="#">However, stakeholder comments indicate that about 1,800 acres of land within the SEZ have wilderness characteristics.</a></p> <p><a href="#">See endnote. iii</a></p>	<p>See <a href="#">other</a> programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/SDAs_and_LWC.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/SDAs_and_LWC.pdf</a></p>	<p>See other programmatic design features at URL under Avoidance column.</p>	

**Comment [HH24]:** Text regarding possible LWC lands in the SEZ and programmatic design features added in response to stakeholder comments.

**Comment [HH25]:** NPS included a comment to coordinate with Sangre de Criso NHA – no new text added because this is already an SEZ-specific design feature.

Also relevant to NPS comments, note that no text was added regarding the Pike's Stockade NHL or the Trujillo Homestead because these areas would not be impacted by development in the SEZ.

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Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
<b>Transportation and Public Access</b> Sections 10.4.2 and 10.4.21	<p><b>Direct:</b> Development will add traffic to existing roads serving the area. U.S. 285 provides a regional traffic corridor that could experience moderate impacts for single projects, an increase during construction of nearly twice the current annual average daily traffic value for this route. Local roads would also be impacted.</p> <p>Glint and glare from solar facilities may affect aircraft pilots, motorists on nearby roads, or crew/passengers on nearby railways.</p> <p><b>Indirect:</b> Potential for adverse impacts to wildlife from new roads and increased traffic (see Ecology-Wildlife section).</p> <p><b>Cumulative:</b> Cumulative impacts to traffic could occur with multiple developments in the region.</p> <p><b>Data Gaps:</b> None identified.</p>	<p>Programmatic design features for visual resources include a requirement to minimize glint and glare.</p> <p>See other programmatic design features at <a href="http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Transportation.pdf">http://blmsolar.anl.gov/documents/docs/peis/programmatic-design-features/Transportation.pdf</a></p>	<p>The following SEZ-specific programmatic design features for minimization will be required:</p> <p>Public access to roads will be maintained through transportation management plan.</p> <p>Local roads improvements will be made to accommodate additional traffic.</p> <p>Construction activities will be planned to minimize impacts (e.g., send trucks in tandem).</p> <p>See programmatic design features at URL under Avoidance column.</p>	<p>No.</p> <p><u>Through a combination of avoidance, design features, and the establishment of alternative access routes to these areas, the potential impacts to transportation can be adequately mitigated.</u></p>

Resource/Issue	Impacts <sup>1</sup>	Onsite Mitigation <sup>2</sup> - <u>To what degree are impacts likely to be mitigated onsite?</u>		Residual or Unavoidable Adverse Impacts <sup>3</sup> ? <u>(Include justification)</u>
		Avoidance	Minimization	
Visual Section 10.4.14	<p><b>Direct:</b> The Visual Resource Inventory (VRI) value for the SEZ and immediate surroundings are VRI Class III, indicating moderate visual values. Impacts could include adverse visual effects on the viewshed (including impacts on night sky viewing and annoyance from glint and glare).</p> <p>The Solar PEIS identified strong visual contrasts for some viewpoints along the Los Caminos Antiguos Scenic Byway and West Fork of the North Branch of the Old Spanish Trail, and for the communities of Manassa, Romeo, and Sanford. Moderate visual contrasts were identified for San Luis Hills WSA and ACEC, and the community of La Jara. There may also be moderate visual contrasts for some viewpoints within the newly designated Rio Grande del Norte National Monument.</p> <p><b>Indirect:</b> None identified.</p> <p><b>Cumulative:</b> If several projects become visible from one location or in succession as viewers move through the landscape (such as driving on local roads, these cumulative impacts may make the area less visually appealing.</p> <p><b>Data Gaps:</b> Additional data from key observation points is needed.</p>	<p>SEZ-specific programmatic design features state that the development of power tower facilities within the SEZ should be prohibited.</p> <p>Additionally, there is a requirement to minimize glint and glare.</p> <p>See other programmatic design features at <a href="http://blmsolar.arl.gov/documents/docs/peis/programmatic-design-features/Visual.pdf">http://blmsolar.arl.gov/documents/docs/peis/programmatic-design-features/Visual.pdf</a></p>	<p>SEZ-specific programmatic design features state that special mitigation should be considered for impacts to the Los Caminos Antiguos Scenic Byway.</p> <p>See other programmatic design features at URL under Avoidance column.</p>	<p>Yes.</p> <p>Residual impacts to be evaluated based on locations of development within the SEZ and project-level NEPA.</p> <p><u>While onsite mitigation would reduce visual contrasts caused by solar facilities within the SEZ, it would not likely reduce impacts to less than moderate or strong levels for nearby viewers.</u></p>
Wild Horses and Burros Section 10.4.4.2	<p>There are no designated wild horse and burrow herds present in the area. There would be no effect on designated wild horse and burro herds from solar energy development of the SEZ.</p> <p><b>Data Gaps:</b> None identified.</p>	Not applicable	Not applicable	No

Endnotes:

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<sup>i</sup> Ecology: Terrestrial Wildlife (continued):

Undisturbed buffer areas and sediment and erosion controls will be maintained around drainages associated with wetland areas located in the immediate vicinity of the SEZ.

See other programmatic design features at URL under Avoidance column.

<sup>ii</sup> Ecology: Animal Special Status Species (continued):

Consultations with the USFWS, CO Division of Wildlife and NM Division of Game and Fish will be conducted to address the potential for impacts on the Mexican spotted owl and southwestern willow flycatcher, and northern leopard frog.

See other programmatic design features at URL under Avoidance column.

See also minimization measures listed for Terrestrial Wildlife and Migratory Birds, which would apply for Animal Special Status Species as well.

<sup>iii</sup> Specially Designated Areas (continued):

Indirect: None identified.

Cumulative: Development of solar facilities and other facilities may result in cumulative effects, particularly visual impacts, on SDAs.

Data Gaps: Additional data from key observation points in specially designated areas is needed.

For projects in the Los Mogotes SEZ that are located within the viewshed of the West Fork of the North Branch of the Old Spanish Trail, a National Trail inventory will be required to determine the area of possible adverse impact.