

ADDENDUM: Summary Table – Impacts that Warrant Offsite Mitigation – Dry Lake SEZ

Resource/ Issue	Unavoidable Impacts? ¹	How certain is it that the unavoidable impacts will occur?	How significant are the unavoidable impacts on-site?	How significant are the unavoidable impacts of developing the Dry Lake SEZ in the region (Mojave Desert)? ²	Role in the ecosystem? ³	Other considerations	Do the unavoidable impacts warrant off-site mitigation?
Soils/Erosion	Yes	Certain	Very – Expect the total loss of biological soils and/or desert pavement over the entire developable area	Trend: decreasing. Approximately 8.8% of soil resources in the Mojave have been altered by human development. For example, 3.8% of desert pavement in the Mojave has been altered. A 0.2% increase in alteration of desert pavement is expected by 2025.	Basic component	Natural regeneration of biological soils and/or desert pavement is very slow in the Mojave Desert.	Yes
Wildlife	Yes	Certain	Very – Expect the loss of habitat for most general wildlife species over the entire developable area	Trend: decreasing. Approximately 7.1% of wildlife habitat in the Mojave has been altered. A 1% increase in alteration is expected by 2025.	Basic component		Yes – indirectly (as a component of the ecosystem)
Special Status Species - Animals	Yes	Loss of habitat is certain. Loss of animals is likely.	Very – Expect the total loss of habitat for special status animal species over the entire developable area	Trend: decreasing. Habitat for special status species has been decreasing in the Mojave; for example, 11.1% of habitat for desert tortoise has been altered at present and an additional 1.4% is expected to be altered by 2025.	Basic component (along with other wildlife)	Mitigation of listed species is required by law and/or policy.	Yes

¹ Unavoidable impacts are those that cannot be adequately mitigated on-site by avoidance and/or minimization. Avoidance is accomplished by imposing spatial and/or temporal restrictions. Minimization is accomplished using design features and/or best management practices.

²Data to determine trends were taken from the BLM Mojave Rapid Ecoregional Assessment.

³Reference the conceptual model

Resource/ Issue	Unavoidable Impacts? ¹	How certain is it that the unavoidable impacts will occur?	How significant are the unavoidable impacts on-site?	How significant are the unavoidable impacts of developing the Dry Lake SEZ in the region (Mojave Desert)? ²	Role in the ecosystem? ³	Other considerations	Do the unavoidable impacts warrant off-site mitigation?
Vegetation	Yes	Certain	Very –Expect the loss of all vegetation over the developable area of the SEZ, though mitigation may result in some remaining or replanted vegetation.	Trend: decreasing. Approximately 7.1% of natural vegetation communities in the Mojave have been altered by human development. A 1% increase in alteration is expected by 2025.	Basic component	Natural regeneration of native vegetation is slow in the Mojave Desert.	Yes
Special Status Species - Vegetation	Yes	Loss of habitat is certain. Loss of plants is likely.	Very – Expect the total loss of special status species plants and/or habitat in the developable area	Trend: decreasing. Special status species plant habitat in the Mojave is expected to continue to decline due to human development.	Basic component (along with other vegetation)	Mitigation of special status species plants is required BLM policy.	Yes
Visual Resources	Yes	Certain	Somewhat. Visual quality of the SEZ and surrounding area is already altered.	Somewhat. Approximately 53% of view sheds in the Mojave have been altered.	Land use (human element)	Other resource mitigation that involves restoring the physical and biological integrity to the landscape may also mitigate visual resources as long as the visual design elements of form, line, color and texture are factored into the restoration planning and design.	Impacts warrant that Visual Resources be included as a part of the site selection criteria for mitigating other biological resources that warrant habitat enhancement treatments, as a co-beneficiary of the mitigation effort. Restoration or protection of intact ecosystems can also restore or protect visual resources.

Resource/ Issue	Unavoidable Impacts? ¹	How certain is it that the unavoidable impacts will occur?	How significant are the unavoidable impacts on-site?	How significant are the unavoidable impacts of developing the Dry Lake SEZ in the region (Mojave Desert)? ²	Role in the ecosystem? ³	Other considerations	Do the unavoidable impacts warrant off-site mitigation?
Specially Designated Areas	Maybe - for impacts to tortoise at Coyote Springs ACEC Maybe for visual impacts to the Desert NWR, other SDAs.	Possible if tortoise migrate or are translocated to the Coyote Springs ACEC Visual impacts – unknown. Lack specific assessments.	Unknown – Impacts of increasing the tortoise population in the ACEC have not been assessed. Visual impacts – unknown. Lack specific assessments.	Unknown. However, any impact that adversely affects a tortoise ACEC in its ability to support tortoise recovery ultimately affects the overall recovery effort. Visual impacts – unknown. Lack an assessment of the conditions and trends of visual resources as seen from other SDAs.	Coyote Springs ACEC: tortoise is a basic component Visual impacts to SDAs: Land use (human element)	Possible to minimize adverse impacts on-site (in the ACEC) by extending tortoise fencing. Possible to minimize adverse visual impacts through onsite mitigation that reduces the degree of visual contrast from new development.	Not at this time, but may be required if additional analysis reveals an adverse impact. Unknown at this time for visual impacts. On-site mitigation measures may be adequate for protecting the SDA viewsheds.
Military	Yes	Unlikely. Aircraft emergencies that occur over the SEZ that pose a threat to human life and/or property are rare.	Somewhat. There is an elevated risk of bodily harm to air crew who eject and land in the area and in a solar facility. The potential for property damage to the facility could alter insurance rates.	Somewhat. Coordination with the military and possible height restrictions will address most impacts..	Land use. (Human element)	Difficult impact to mitigate for off-site.	No
Native American Concerns	Hydrology – Yes, if non-PV technology is permitted. Habitat loss – Yes Cultural - maybe	Unlikely for hydrology Certain for habitat loss Unknown for cultural until Class III inventories are completed	See Wildlife and special status species entries.	See Wildlife and special status species entries	Human element		Unknown at this time. Consultation on project applications will determine whether mitigation for Native American Concerns is warranted.

Resource/ Issue	Unavoidable Impacts? ¹	How certain is it that the unavoidable impacts will occur?	How significant are the unavoidable impacts on-site?	How significant are the unavoidable impacts of developing the Dry Lake SEZ in the region (Mojave Desert)? ²	Role in the ecosystem? ³	Other considerations	Do the unavoidable impacts warrant off-site mitigation?
Invasive/ Noxious Weeds	Maybe – if weed management plan fails.	Not likely. On-site mitigation measures are expected to protect against the establishment and/or spread of invasive/noxious weeds.	Not particularly significant. On-site mitigation measures are expected to minimize any impacts. Monitoring will facilitate timely discovery of infestations.	Invasive/noxious weed infestation is a problematic trend in the region. However, on-site mitigation is expected to minimize any impacts on the site, as well as to the region.	Change agent		No., but restoration or protection of intact ecosystems will also restore or protect the ability to resist invasive species.
Hydrology (Water/ Watershed/ Water Quality)	Groundwater- Maybe Surface Hydrology- Maybe. Reconfiguration of topography can alter surface hydrology	Groundwater – Unlikely. BLM will review all applications to validate net neutral water use (i.e. ground- water purchased from holders of currently- used existing senior water rights) Surface hydrology – likely.	Surface hydrology: Not especially significant. Area of very low rainfall (~4 inches/year). Closed hydrologic basin.	Not particularly significant, but there is a regional decline in unaltered ephemeral stream channels.	Basic component		Groundwater-No. Surface Hydrology - Yes (indirectly as a component of the ecosystem).
Riparian	Surface Hydrology- Maybe. Reconfiguration of topography can alter surface hydrology	Somewhat: While major riparian areas within the SEZ are designated non- development areas, run-off patterns and sediment load will be altered by reconfiguration of the topography on the rest of the SEZ. On-site mitigation measures are expected to minimize impacts.	Not especially significant; PEIS analyses show about 5 intermittent ephemeral stream reaches with moderate sensitivity to disturbance within the SEZ.	Not particularly significant. The occurrence of intact riparian systems is declining in the Mojave region.	Basic component		No (not directly). While there may be impacts to riparian systems, protection and/or restoration of intact ecosystems (off-site) that include riparian areas will slow the regional decline in intact riparian systems.

Resource/ Issue	Unavoidable Impacts? ¹	How certain is it that the unavoidable impacts will occur?	How significant are the unavoidable impacts on-site?	How significant are the unavoidable impacts of developing the Dry Lake SEZ in the region (Mojave Desert)? ²	Role in the ecosystem? ³	Other considerations	Do the unavoidable impacts warrant off-site mitigation?
Cultural	Maybe.	Low. Previous Class III cultural inventories in the SEZ and vicinity indicated risk of resource loss is low.	Depends on results of Class III inventory of SEZ and if significant (eligible) sites are discovered.		Human Element	On-site mitigation measures were determined to be adequate for addressing known cultural resources.	Not at this time. However, if significant resource values are discovered during the pre-development survey, implementing the required protection measures as established in the MOA may result in off-site mitigation measures.

Resources/Issues with no unavoidable impacts:

Acoustics
Air Quality
Environmental Justice
Fire
Hazardous Waste
Lands & Realty
Minerals
Paleontological
Livestock Grazing
Recreation (includes Travel Management Areas)
Socioeconomics
Transportation
Wild Horses and Burros
Wilderness & Lands with Wilderness Characteristics