

## **Draft Methodology for Identifying the Impacts of Utility-Scale Solar Development in Solar Energy Zones (SEZs) that Warrant Off-site Mitigation**

Identifying the impacts of utility-scale solar development that warrant off-site mitigation involves three steps:

1. Identifying all the potential impacts
2. Identifying the unavoidable impacts, that is, the impacts that cannot be adequately mitigated on-site by avoidance and/or the implementation of design features meant to minimize the impact.
3. Identifying which of the unavoidable impacts warrant off-site mitigation by taking into consideration the status and trend of the impacted resources in the region and how they would be affected by the unavoidable impacts.

The following methodology is designed to operationalize step 3 - identifying which of the unavoidable impacts warrant off-site mitigation.

### **Methodology**

1. A BLM interdisciplinary team will refine SEZ-specific avoidance areas and redefine the type, acreage and/or quantity of the unavoidable impacts accordingly based on:
  - a. the location of mining claims,
  - b. existing right-of-way grants, and or
  - c. any other potential land-use conflicts with any resource value that might be avoided by restricting development within the SEZ.
2. A BLM team will adopt and adapt a conceptual model that explains the role that resources, individually and in concert with one another, play in the function of the relevant ecological, social, and cultural systems present in the region. This regional model will provide the context to identify critical resources at the local scale. The BLM will provide opportunity for public review and sharing of facts and information that enhance understanding of resources, system, and function. Potential information sources for the conceptual model include:
  - a. BLM Rapid Eco-regional Assessments (REAs)
  - b. BLM Resource Management Plans (RMPs)
  - c. Resource specialist expert opinion
  - d. The Nature Conservancy Eco-Regional Assessments
  - e. Habitat Conservation Plans
  - f. Other baseline resource surveys, inventories, occurrence records, studies/research, assessments, and plans that provide insight into regional conditions and trends
  - g. Ethnographic studies
  - h. BLM, county, or regional land use plans
  - i. Federal, State, or local social and economic studies

3. Based on best-available information, conceptual models, assessments, and expert opinion, a BLM interdisciplinary team will identify at-risk resources and processes in the region that coincide with resources identified as experiencing unavoidable adverse impacts due to solar development within the SEZ.
4. Using the results of steps 2 and 3, a BLM interdisciplinary team will estimate how the unavoidable impacts of solar development will affect the status and trend of the at risk resource values at both local and regional scales. The BLM will provide opportunity for public review and sharing of facts and information that enhance understanding of unavoidable impacts on resource value, condition, and trend.
5. For each unavoidable impact a BLM interdisciplinary team will identify criteria that describe at what point the unavoidable impacts would warrant off-site mitigation. The criteria/decision point will reference:
  - a. The relative importance placed on the resource in the land use plan;
  - b. The rarity, legal status, or state or national policy status of the resource; and
  - c. The resilience of the resource in the face of change and impact.
6. A BLM interdisciplinary team will apply the criteria to the full build-out of the SEZ to identify which unavoidable impacts, in the context of the regional setting, will likely warrant off-site mitigation. This list will be made available to the stakeholders and the public at large for review and comment.
7. The BLM interdisciplinary team will finalize the list of unavoidable impacts that will likely warrant off-site mitigation.