

IV.26 OTHER CALIFORNIA ENVIRONMENTAL QUALITY ACT AND NATIONAL ENVIRONMENTAL POLICY ACT CONSIDERATIONS

Each chapter in Volume IV describes the effects of Desert Renewable Energy Conservation Plan (DRECP or Plan) alternatives for each renewable energy resource (i.e., solar, wind, and geothermal) and its associated transmission facilities, then compares the impacts of each alternative with those in the Preferred Alternative. These analyses satisfy many of the requirements under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). However, a number of topics that must be considered under these laws are independent of a specific resource and are therefore addressed separately in this chapter.

IV.26.1 CEQA Requirements

Under the CEQA Guidelines, this Environmental Impact Report (EIR) must identify, consider, and discuss significant environmental effects that may result from building and operating proposed projects (14 California Code of Regulations [CCR] Section 15126.2[a]). Consistent with this requirement, individual environmental resource chapters in Volume IV disclose and assess the environmental effects on individual resources that would result from implementing the DRECP.

CEQA further requires that the EIR consider:

- Significant environmental effects that cannot be avoided (14 CCR Section 15126.2[b]) and effects not found to be significant (14 CCR Section 15128).
- Significant irreversible environmental changes that would be caused by the project (14 CCR Section 15126.2[c]).
- Growth-inducing impacts of the project (14 CCR Section 15126.2[d]).
- Potential energy impacts of the proposed project (14 CCR Appendix F).

Sections IV.26.1.1 through IV.26.1.4 address these CEQA requirements. In addition, Table IV.26-1 provides a guide to where each required CEQA component appears in this EIR/EIS.

**Table IV.26-1
Location of Required CEQA Components in EIR/EIS**

| Component | Location in Plan |
|--|--|
| <i>Table of Contents or Index (14 CCR Section 15122)</i> | |
| | <ul style="list-style-type: none"> • EIR/EIS includes a Table of Contents for each Volume and for each Chapter • A description and chart are included in Volume I, Section I.0.1 (DRECP Document Organization) |

**Table IV.26-1
Location of Required CEQA Components in EIR/EIS**

| Component | Location in Plan |
|--|--|
| <i>Summary (14 CCR Section 15123)</i> | |
| <p>(a) An EIR shall contain a brief summary of the proposed actions and its consequences... language... should be as clear and simple as reasonably practical.</p> <p>(b) The summary shall identify:</p> <p style="padding-left: 20px;">(1) Each significant effect with proposed mitigation measures and alternatives...;</p> <p style="padding-left: 20px;">(2) Areas of controversy...; and</p> <p style="padding-left: 20px;">(3) Issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.</p> | <ul style="list-style-type: none"> • The Executive Summary (Part Four) summarizes environmental impacts and presents a Comparison of Alternatives • Chapter IV.26, Section IV.26.1.1 provides tables (Table IV.26-2 and IV.26-3) that identify the significance of each impact and the proposed mitigation measures for each impact • Executive Summary Table 8 presents each significant effect and proposed mitigation measures. • Executive Summary Section 4.4 addresses Areas of Controversy • Executive Summary Section 4.5 defines Issues to be Resolved |
| <i>Project Description (14 CCR Section 15124)</i> | |
| The precise location and boundaries on a detailed map, preferably topographic... location of the project. | <ul style="list-style-type: none"> • Volume II of the EIR/EIS presents detailed descriptions of each alternative (including the Preferred Alternative), along with numerous maps |
| A statement of the objectives sought by the proposed project... underlying purpose of the project. | <ul style="list-style-type: none"> • Volume I, Chapter I.1 presents objectives and goals |
| A general description of the project's technical, economic, and environmental characteristics... | <ul style="list-style-type: none"> • Volume II of the EIR/EIS presents detailed descriptions of each alternative in Chapters II.2 through II.7 |
| <p>The intended uses of the EIR.</p> <p>A list of the agencies that are expected to use the EIR in their decision-making.</p> <p>A list of permits and other approvals required to implement the project.</p> <p>A list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies.</p> | <ul style="list-style-type: none"> • Volume I, Chapter I.1 presents objectives and goals • Volume I presents the decisions to be made (including each agency and the decisions each agency will make) (Chapter I.1), the Legal Framework of the Plan (Chapter I.2), and a description of the Planning Process (Chapter I.3) • Appendix A2 presents the Timeline of MOUs and Agreements Related to DRECP |
| If a public agency must make more than one decision on a project, all its decisions subject to CEQA should be listed, preferably in the order in which they will occur. | <ul style="list-style-type: none"> • Legal Framework and Planning Process (I.2, I.3) |
| <i>Environmental Setting (14 CCR Section 15125)</i> | |
| An EIR must include a description of the physical environmental conditions in the vicinity of the project...from both a local | <ul style="list-style-type: none"> • Volume III of the EIR/EIS presents the environmental setting for each of 23 environmental disciplines • Rare/unique resources likely those found to be |

**Table IV.26-1
Location of Required CEQA Components in EIR/EIS**

| Component | Location in Plan |
|---|--|
| and regional perspective. Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. | <p>significant impacts are addressed in Chapters III.8 (cultural), III.9 (Native American), III.10 (paleontological), III.18 (outdoor recreation), III.20 (visual), etc.</p> <ul style="list-style-type: none"> • Oct. 15, 2013, is the baseline date in Volume III, Chapter III.1; this chapter includes a definition and overview of baseline environmental setting (including ecoregion subareas) • Appendix Q: Baseline Biology Report • Appendix O: Existing Renewable Energy Projects • Appendix P: Climate Change |
| The EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans. (habitat conservation plans, natural community conservation plans and regional land use plans) | <ul style="list-style-type: none"> • The EIR/EIS discusses the GCP, the NCCP, and the potential impacts related to these permits, throughout Volume IV • Volume IV, Chapter III.11 (Land Use) addresses planning documents |
| <i>Environmental Impacts (14 CCR Sections 15126, 15126.2, 15126.6, 15128)</i> | |
| <p>Significant Environmental Effects of the Proposed Project (14 CCR Sections 15126(a), 15126.2(a))</p> <p>Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented (14 CCR Sections 15126(b), 15126.2(b))</p> <p>Significant Irreversible Environmental Changes (14 CCR Sections 15126(c), 15126.2(c))</p> | <ul style="list-style-type: none"> • The Executive Summary (Part Four) defines significant and unmitigable impacts • Each chapter of Volume IV presents CEQA significance thresholds and defines the significance of each impact; see specific issue sections for explanation of significance • Chapter IV.26, Section IV.26.1.1, Table IV.26-2 (Summary of Significant and Unavoidable Adverse Impacts Under CEQA) |
| Alternatives to the Proposed Project (14 CCR Sections 15126(f), 15126.6) | <ul style="list-style-type: none"> • Alternatives are defined in Volume II • Impact analysis of alternatives is presented in each chapter of Volume IV |
| Growth-Inducing Impacts (14 CCR Sections 15126(d), 15126.2(d)) | <ul style="list-style-type: none"> • Chapter IV.23, Socioeconomics and Environmental Justice • Chapter IV.26, Section IV.26.1.3, Growth-Inducing Impacts |
| Mitigation Measures (14 CCR Sections 15126(e), 15126.4) | <ul style="list-style-type: none"> • Each chapter in Volume IV presents mitigation measures, as required based on impact analysis |
| <i>Insignificant Effects (14 CCR Section 15128)</i> | |
| The EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant... | <ul style="list-style-type: none"> • Vol. IV in each impact section, as well as briefly in Chapter IV.26 (Other Considerations) |

**Table IV.26-1
Location of Required CEQA Components in EIR/EIS**

| Component | Location in Plan |
|--|--|
| <i>EIR Preparers and List of Organizations and Persons Consulted (14 CCR Section 15129)</i> | |
| The EIR shall identify all federal, state, or local agencies, other organizations, and private individuals consulted in preparing the draft EIR, and the persons, firm, or agency preparing the draft EIR, by contract or other authorization. | <ul style="list-style-type: none"> • Volume V – Consultation and Coordination • Appendix U – Table U-1 is List of Preparers and Table U-2 is Persons and Organizations Consulted • Appendix A1 – List of Stakeholders • Appendix A2 - Timeline of MOUs and Agreements Related to DRECP |
| <i>Cumulative Impacts (14 CCR Section 15130)</i> | |
| An EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable... | <ul style="list-style-type: none"> • Chapter IV.25, Cumulative Impacts |
| <i>Economic and Social Effects (14 CCR Section 15131)</i> | |
| Economic or social information may be included in an EIR or may be presented in whatever form the agency desires. | <ul style="list-style-type: none"> • Chapter IV.23, Socioeconomics and Environmental Justice |

IV.26.1.1 Significant Environment Effects That Cannot Be Avoided and Effects Not Found to Be Significant

Pursuant to Section 15126.2(b) of the CEQA Guidelines, an EIR must identify a project’s unavoidable significant environmental impacts. An EIR shall:

Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

CEQA also requires an explanation as to why possible significant project effects were determined to be not significant and, therefore, not discussed in detail (14 CCR Section 15128). Impacts determined to be less than significant are identified and described in Chapters IV.2 through IV.24, including explanations for how each of the impacts was determined to be less than significant.

In evaluating the environmental effects of the proposed DRECP, some impacts were found to be significant but could be neither avoided nor reduced to a level of insignificance, even with mitigation. Table IV.26-2 presents these significant impacts, followed by Table IV.26-3,

which summarizes all impacts found to be less than significant, with or without mitigation measures. The tables include only those impacts assessed under CEQA.

This EIR/EIS evaluates some impacts under NEPA only—either because they are specifically excluded from CEQA consideration (based on CEQA Guidelines), or because they relate only to Bureau of Land Management (BLM) lands or land management concerns. These NEPA-only impacts are not included in Tables IV.26-2 and IV.26-3. The NEPA-only impacts are listed here:

Socioeconomics (Chapter IV.23)

- Impact SE-3: Plan components may affect economic development and government finance.
- Impact SE-4: Plan components may generate social change and social disruption.
- Impact SE-5: Plan components may affect property values.

BLM Lands and Realty (Chapter IV.13)

- Impact LR-1: BLM land tenure adjustments could conflict with applicable BLM policies and regulations.
- Impact LR-2: Development on BLM land would conflict with existing land-use authorizations.
- Impact LR-3: Development within designated exclusion areas would conflict with BLM regulations and policies.
- Impact LR-4: Conservation actions could prohibit existing authorized land uses.

BLM Land Designations (Chapter IV.14)

- Impact LD-1: Development and operation of renewable energy and transmission facilities would reduce the value of designated conservation areas.
- Impact LD-2: Development and operation of renewable energy and transmission facilities would conflict with the existing management goals and objectives of special designations.

Wild Horses and Burros (Chapter IV.17)

- Impact WH-1: Plan components would result in loss of forage for wild horses and burros.
- Impact WH-2: Plan components would result in displacement of wild horses and burros.

- Impact WH-3: Plan components would reduce access to wild horse and burro habitat or require relocation.
- Impact WH-4: Plan components would result in injury, harassment, or increased mortality due to construction or operations and maintenance activities.

Table IV.26-2
Summary of Significant and Unavoidable Adverse Impacts Under CEQA

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|---|---|------------------------------------|
| <i>Meteorology & Climate Change</i> | | | | |
| <p>Impact MC-2: Construction or operation of plan components would conflict with an applicable plan, policy, or regulation intended to address climate change.</p> <ul style="list-style-type: none"> • A cumulatively considerable impact for the No Action Alternative only. | Significant | No Action Alternative | <ul style="list-style-type: none"> • None available; adopting one of the action alternatives would be a feasible strategy for avoiding this potential conflict | Significant, unmitigable (SU) |
| <i>Groundwater, Water Supply, and Water Quality</i> | | | | |
| <p>Impact GW-2: Groundwater consumption lowers groundwater levels, depletes water supplies, and affects groundwater discharge.</p> <ul style="list-style-type: none"> • Also a cumulatively considerable impact. | Significant | No Action Alternative for all technologies; All Action Alternatives for Geothermal only | <ul style="list-style-type: none"> • Typical mitigation would not reduce impacts to less than significant for the No Action Alternative • No feasible mitigation for geothermal generation for all alternatives | SU |
| <i>Biological Resources</i> | | | | |
| <p>Impact BR-1: Siting, construction, decommissioning, and operational activities would result in loss of native vegetation.</p> <ul style="list-style-type: none"> • Also a cumulatively considerable impact for the No Action Alternative only. | Significant | No Action Alternative | <ul style="list-style-type: none"> • Typical mitigation measures would avoid or minimize adverse effects, but existing laws and regulations do not require compensation for all the loss of all natural communities in the Plan Area | SU |

**Table IV.26-2
Summary of Significant and Unavoidable Adverse Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|---|--|------------------------------------|
| <p>Impact BR-4: Siting, construction, decommissioning, and operational activities would result in loss of listed and sensitive plants; disturbance, injury, and mortality of listed and sensitive wildlife; and habitat for listed and sensitive plants and wildlife.</p> <ul style="list-style-type: none"> Also a cumulatively considerable impact for Alternative 2 and the No Action Alternative only. | Significant | Alternative 2 and No Action Alternative | <ul style="list-style-type: none"> Typical mitigation measures would not offset the magnitude and extent of impacts to listed and sensitive plants and wildlife | SU |
| <p>Impact BR-6: Siting, construction, decommissioning, and operational activities would adversely affect habitat linkages and wildlife movement corridors, the movement of fish, and native wildlife nursery sites.</p> <ul style="list-style-type: none"> Also a cumulatively considerable impact for Alternative 2 and the No Action Alternative only. | Significant | Alternative 2 and No Action Alternative | <ul style="list-style-type: none"> Typical mitigation measures would not offset the magnitude and extent of impacts to listed and sensitive wildlife movement and migratory bird movement | SU |
| <p>Impact BR-7: Siting, construction, decommissioning, and operational activities would result in habitat fragmentation and isolation of populations of listed and sensitive plants and wildlife.</p> <ul style="list-style-type: none"> Also a cumulatively considerable impact for the No Action Alternative only. | Significant | No Action Alternative | <ul style="list-style-type: none"> Potential adverse effects of habitat fragmentation and population isolation would not be avoided, minimized, or compensated on a project-by-project basis, except as necessary to comply with existing applicable laws and regulation pertaining to listed and sensitive plants and wildlife | SU |

**Table IV.26-2
 Summary of Significant and Unavoidable Adverse Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|---|-------------------------------------|-------------------------|--|------------------------------------|
| <p>Impact BR-9: Operational activities would result in avian and bat injury and mortality from collisions, thermal flux, or electrocution at generation and transmission facilities.</p> <ul style="list-style-type: none"> Also a cumulatively considerable impact for the No Action Alternative only. | Significant | No Action Alternative | <ul style="list-style-type: none"> Adverse effects would be avoided, minimized, and compensated through the implementation of typical mitigation and existing laws and regulations for avian and bat species. These typical mitigation measures would not be expected to offset the expected magnitude and extent of all the avian and bat injury and mortality | SU |
| <i>Cultural Resources</i> | | | | |
| <p>Impact CR-2: Plan components could affect prehistoric resources.</p> <ul style="list-style-type: none"> Also a cumulatively considerable impact for all alternatives. | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> Treatment plans, personnel training, use of cultural and tribal monitors, BMPs for visual effects, data recovery, dust control, vibration reduction, recordation, conservation easements, technical reports, and compensatory mitigation | SU |
| | Significant | All Action Alternatives | <ul style="list-style-type: none"> CR-2a: Protect Prehistoric Resources | |

**Table IV.26-2
Summary of Significant and Unavoidable Adverse Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|---|-------------------------------------|-------------------------|--|------------------------------------|
| Impact CR-3: Plan components could disturb human remains or cultural items, including funerary objects, sacred objects, and objects of cultural patrimony. <ul style="list-style-type: none"> Also a cumulatively considerable impact for all alternatives. | Significant | No Action Alternative | <ul style="list-style-type: none"> See Impact CR-2 for typical mitigation | SU |
| | Significant | All Action Alternatives | <ul style="list-style-type: none"> CR-3a: Protect Human Remains and Associated Cultural Items, Including Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony | |
| Impact CR-4: Plan components could affect cultural landscapes. <ul style="list-style-type: none"> Also a cumulatively considerable impact for all alternatives. | Significant | No Action Alternative | <ul style="list-style-type: none"> See Impact CR-2 (No Action Alternative) | SU |
| | Significant | All Action Alternatives | <ul style="list-style-type: none"> CR-4a: Protect Cultural Landscapes | |
| <i>Native American Concerns</i> | | | | |
| Impact TL-1: Plan components could disproportionately affect resources of cultural and spiritual importance to tribes. <ul style="list-style-type: none"> Also a cumulatively considerable impact for all alternatives. | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> Treatment plans, personnel training, use of cultural and tribal monitors, BMPs for visual effects, data recovery, dust control, vibration reduction, recordation, conservation easements, technical reports, and compensatory mitigation | SU |
| | Significant | All Action Alternatives | <ul style="list-style-type: none"> TL-1a: Protect Tribal Resources | SU |
| Impact TL-2: Costs associated with the participation in environmental documents required by the Plan would be disproportionately borne by tribal governments and organizations. <ul style="list-style-type: none"> Also a cumulatively considerable impact for all alternatives. | Significant | No Action Alternative | <ul style="list-style-type: none"> See Impact TL-1 for typical mitigation (No Action Alternative) | SU |
| | Significant | All Action Alternatives | <ul style="list-style-type: none"> TL-2a: Provide Support to Tribal Governments | SU |

**Table IV.26-2
 Summary of Significant and Unavoidable Adverse Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|-------------------------|---|------------------------------------|
| <i>Paleontology</i> | | | | |
| Impact PR-1: Land disturbance could result in loss, damage, or destruction of significant paleontological resources. <ul style="list-style-type: none"> Also a cumulatively considerable impact for the No Action Alternative only. | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> Monitoring plans requiring specific qualifications, preconstruction surveys, construction monitoring, discovery protocol, and reporting procedures | SU |
| <i>Agricultural Resources</i> | | | | |
| Impact AG-1: Alternative would convert Important Farmland to nonagricultural use or conflict with Williamson Act contracts. <ul style="list-style-type: none"> Also a cumulatively considerable impact for all alternatives. | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> Avoidance and minimization of agricultural disturbance Compensatory mitigation for lost farmland | SU |
| | Significant | All Action Alternatives | <ul style="list-style-type: none"> AG-1a: Minimize Impacts to Agricultural Resources AG-1b: Develop an Agricultural Resources Protection plan AG-1c: Compensate for Loss of Important Farmland AG-1d: Ensure Compatibility with or Terminate Williamson Act Contracts | SU |

**Table IV.26-2
Summary of Significant and Unavoidable Adverse Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|---|--|------------------------------------|
| <i>Mineral Resources</i> | | | | |
| <p>Impact MR-1: Plan components would reduce or improve access to and development of known and future mineral resources</p> <ul style="list-style-type: none"> Also a cumulatively considerable impact for Alternatives 1 through 4 and the Preferred Alternative. | Significant | All Action Alternatives– Reserve Design | <ul style="list-style-type: none"> MR-1a: Coordinate to Ensure Access to Mineral Resources Note that impacts of renewable energy development are mitigable to less than significant levels, but impacts of the reserve design would be significant and unmitigable due to the restriction of access to minerals | SU` |
| <i>Outdoor Recreation</i> | | | | |
| <p>Impact OR-1: Plan components could enhance or degrade recreational use</p> <ul style="list-style-type: none"> Also a cumulatively considerable impact for all alternatives. | Significant | No Action Alternative | <p>Typical mitigation includes:</p> <ul style="list-style-type: none"> Maintain public access Avoid development affecting unique or important recreation resources Restore or enhance other recreational areas or OHV routes to compensate for loss of access or value caused by development Plan projects to avoid direct impacts on recreational resources | SU |
| | Significant | All Action Alternatives | <ul style="list-style-type: none"> None required (CMAs protect recreational resources to the extent feasible) | SU |

**Table IV.26-2
Summary of Significant and Unavoidable Adverse Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|-------------------------|---|------------------------------------|
| <i>Visual Resources</i> | | | | |
| Impact VR-2: The presence of Plan components would create long-term visual contrast with surrounding undeveloped land and result in long-term diminished scenic quality. <ul style="list-style-type: none"> • Also a cumulatively considerable impact for all alternatives. | Significant | No Action Alternative | <ul style="list-style-type: none"> • Adjust site configurations and harmonize earthwork with topographic forms and contours • Modify facility designs, colors, locations, and materials to reduce visibility and contrast • Treat structures to reduce contrast and glare • Minimize lighting and focus fixtures downward | SU |
| | Significant | All Action Alternatives | <ul style="list-style-type: none"> • No mitigation (CMAs and BLM guidance would still apply) | SU |

**Table IV.26-3
Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|-------------------------|---|------------------------------------|
| <i>Air Quality</i> | | | | |
| Impact AQ-1: Plan components would generate short-term air emissions that violate any air quality standard or contribute to an existing or projected air quality violation. | Significant | No Action | <ul style="list-style-type: none"> • Typical solar and wind measures (1) through (5) and the typical geothermal measures (1) and (2), which would implement feasible control strategies for construction dust and construction equipment emissions | Less than Significant (LTS) |
| | | All Action Alternatives | <ul style="list-style-type: none"> • AQ-1a: Control Fugitive Dust • AQ-1b: Use Low-emission Engines • AQ-1c: Use Electric-powered Equipment • AQ-1d: Obtain Emission Offset Credits for Construction Emissions | LTS |
| Impact AQ-2: Long-term operations air emissions would violate air quality standards or contribute to air quality violations. | Significant | No Action | <ul style="list-style-type: none"> • Typical solar and wind measures (6) through (10) and the typical geothermal measures (3) through (5), which would implement feasible control strategies for stationary sources at renewable energy facilities and for equipment used during operations and maintenance at each project site | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • AQ-2a: Use Best Available Emission Controls (stationary sources) • AQ-2b: Obtain Emission Offset Credits (operational emissions) • Mitigation Measures AQ-1a, AQ-1b, AQ-1c, and AQ-1d | LTS |

**Table IV.26-3
Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|-------------------------|---|------------------------------------|
| Impact AQ-3: Operations would expose air quality-sensitive receptors to adverse air pollutant concentrations. | Significant | No Action | <ul style="list-style-type: none"> • Typical solar and wind measures (6) through (10) and the typical geothermal measures (3) through (5), which would implement feasible control strategies for stationary sources at renewable energy facilities and for equipment used at each project site | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • AQ-3b: Avoid Locations Near Sensitive Land Uses • Mitigation Measures AQ-1a, AQ-1b, AQ-1c, AQ-1d, AQ-2a and AQ-2b | LTS |
| Impact AQ-4: Operations would conflict with or obstruct implementation of applicable air quality plans. | Significant | No Action | <ul style="list-style-type: none"> • Typical solar and wind measures (6) through (10) and the typical geothermal measures (3) through (5), which would implement feasible stationary source control measures | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • Mitigation Measures AQ-1a, AQ-1b, AQ-1c, AQ-1d, Q-2a, AQ-2b, and AQ-3a | LTS |
| Impact AQ-5: Operations would create objectionable odors affecting a substantial number of people. | Significant | No Action | <ul style="list-style-type: none"> • Typical geothermal measure (3) which would implement feasible stationary source control measures | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • Mitigation Measure AQ-3a | LTS |
| <i>Meteorology & Climate Change</i> | | | | |
| Impact MC-1: Construction or operation of plan components would generate GHG emissions. | Less than significant | All Alternatives | <ul style="list-style-type: none"> • No mitigation required. Renewable generation in Plan Area would reduce fossil-fueled generation elsewhere, reducing GHG emissions | LTS |
| Impact MC-2: Construction or operation of plan components would conflict with an applicable plan, policy, or regulation intended to address climate change. | Less than significant | All Action Alternatives | <ul style="list-style-type: none"> • No mitigation required because projects constructed under the DRECP would comply with existing regulations and State policies. | LTS |

**Table IV.26-3
Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|-------------------------|---|------------------------------------|
| <i>Geology and Soils</i> | | | | |
| Impact SG-1: Plan components would expose people or structures to injury or damage from seismic, volcanic, or landslide activity. | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Reduce effects of groundshaking • Conduct geotechnical surveys for landslides and problem soils | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • SG-1a: Complete Geotechnical Investigations for Hazards • SG-1b: Reduce Effects of Groundshaking • SG-1c: Conduct Landslide Surveys and Protect Against Slope Instability | LTS |
| Impact SG-2: Soil or sand erosion would be triggered or accelerated due to plan components. | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Protect disturbed soil from wind erosion • Protect sand and sand transport corridors | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • SG-2a: Prepare Erosion Control Plan • SG-2b: Protect Sand and Sand Transport Corridors | LTS |
| Impact SG-3: Plan components would expose structures to damage from corrosive or expansive soils. | Significant | No Action Alternative | Typical mitigation includes <ul style="list-style-type: none"> • Conducting geotechnical surveys for landslides and problem soils | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • SG-3a: Complete Geotechnical Studies for Soil Conditions | LTS |
| Impact SG-4: Plan components would destroy or disturb desert pavement. | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Protect desert pavement | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • SG-4a: Protect and Restore Desert Pavement | LTS |

**Table IV.26-3
 Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|---|-------------------------------------|-------------------------|--|------------------------------------|
| <i>Flood Hazard, Hydrology & Drainage</i> | | | | |
| Impact FH-1: Plan components could substantially alter existing drainage patterns and increase the risk of flooding on or off site | Significant | No Action Alternative | <ul style="list-style-type: none"> • Prepare drainage, erosion, and sedimentation control plans • Control waste discharge • Control stormwater diversion | LTS |
| | Significant | All Action Alternatives | <ul style="list-style-type: none"> • FH-1a: Develop and Implement Erosion and Sedimentation Control Plan | LTS |
| Impact FH-2: Plan components could alter hydrologic processes and water-dependent resources of surface water features | Significant | No Action Alternative | <ul style="list-style-type: none"> • Same as Impact FH-1 | LTS |
| | Significant | All Action Alternatives | <ul style="list-style-type: none"> • FH-2a: Channel Maintenance Program | LTS |
| Impact FH-3: Plan components could result in accidental releases of contaminants resulting in degradation of water quality | Less than significant | No Action Alternative | <ul style="list-style-type: none"> • Same as Impact FH-1 | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • No mitigation required. Existing regulations and CMAs ensure that water quality would be protected | LTS |
| <i>Groundwater</i> | | | | |
| Impact GW-1: Construction of plan components could alter groundwater recharge | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Recharge improvement measures • Metering to measure water use • Monitoring groundwater-dependent vegetation and brine ponds | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • GW-1a: Improve Groundwater Recharge | LTS |
| Impact GW-2: Groundwater pumping and consumption lowers groundwater levels, depletes water supplies, and affects groundwater discharge | Significant | All Action Alternatives | <ul style="list-style-type: none"> • GW-2a: Minimize Water Use • GW-2b: Develop Mitigation Action Plan for Drawdown | LTS |

**Table IV.26-3
 Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|---|--|-------------------------|---|---|
| Impact GW-3: Groundwater and geothermal water use could cause land subsidence | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> Monitoring and reporting of groundwater level, quality, and subsidence Compensation for affected well owners | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> GW-3a: Design and Implement Subsidence Monitoring and Reporting GW-3b: Develop Mitigation Action Plan for Subsidence | LTS |
| Impact GW-4: Groundwater use could cause existing poor-quality groundwater to migrate | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> Monitoring and reporting of groundwater level, quality, and subsidence Compensation for affected well owners | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> GW-4a: Develop Mitigation Action Plan to Protect Groundwater Quality | LTS |
| Impact GW-5: Injection of water for geothermal steam generation could contaminate potable water supplies | LTS | All Alternatives | <ul style="list-style-type: none"> No mitigation required. Existing regulations and CMAs would prevent groundwater contamination | LTS |
| Impact GW-6: Chemical spills or brine disposal could impact groundwater quality | LTS | All Alternatives | <ul style="list-style-type: none"> No mitigation required. Existing regulations specify design requirements to prohibit inappropriate disposal | LTS |
| <i>Biological Resources</i> | | | | |
| Impact BR-1: Siting, construction, decommissioning, and operational activities would result in loss of native vegetation | Significant | All Action Alternatives | <ul style="list-style-type: none"> BR-1a: Prepare a Rare Natural Community Avoidance and Mitigation Plan | LTS |

**Table IV.26-3
 Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|---|-------------------------------------|---|--|------------------------------------|
| Impact BR-2: Siting, construction, decommissioning, and operational activities would result in adverse effects to jurisdictional waters and wetlands. | Significant | No Action Alternative | <ul style="list-style-type: none"> Existing applicable laws and regulations and typical mitigation would avoid, minimize and compensate for significant adverse effects to jurisdictional waters and wetlands | LTS |
| | Less than significant | All Action Alternatives | <ul style="list-style-type: none"> No mitigation required. Bio CMAs provide for avoidance and minimization of impacts to biological resources so significant impacts are not anticipated | LTS |
| Impact BR-3: Siting, construction, decommissioning, and operational activities would result in degradation of vegetation | Significant | No Action Alternative | <ul style="list-style-type: none"> Typical mitigation consistent with existing applicable laws and regulations would protect against vegetation degradation | LTS |
| | Less than significant | All Action Alternatives | <ul style="list-style-type: none"> No mitigation required. Bio CMAs provide for avoidance and minimization of impacts to biological resources, so significant impacts are not anticipated | LTS |
| Impact BR-4: Siting, construction, decommissioning, and operational activities would result in loss of listed and sensitive plants; disturbance, injury, and mortality of listed and sensitive wildlife; and habitat for listed and sensitive plants and wildlife. | Less than significant | Preferred Alternative, Alternatives 1, 3, and 4 | <ul style="list-style-type: none"> No mitigation required. Bio CMAs provide for avoidance and minimization of impacts to biological resources, so significant impacts are not anticipated | LTS |
| Impact BR-5: Siting, construction, decommissioning, and operational activities could result in loss of nesting birds (violation of the federal Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5, 3511, and 3513). | Significant | No Action Alternative | <ul style="list-style-type: none"> Typical mitigation consistent with existing applicable laws and regulations would reduce the potential significant adverse effects to nesting birds | LTS |
| | Less than significant | All Action Alternatives | <ul style="list-style-type: none"> No mitigation required. Bio CMAs provide for avoidance and minimization of impacts to biological resources so significant impacts are not anticipated | LTS |

**Table IV.26-3
Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|---|---|------------------------------------|
| Impact BR-6: Siting, construction, decommissioning, and operational activities would adversely affect habitat linkages and wildlife movement corridors, the movement of fish, and native wildlife nursery sites | Less than significant | Preferred Alternative, Alternatives 1, 3, and 4 | <ul style="list-style-type: none"> No mitigation required. Bio CMAs provide for avoidance and minimization of impacts to biological resources so significant impacts are not anticipated | LTS |
| Impact BR-7: Siting, construction, decommissioning, and operational activities would result in habitat fragmentation and isolation of populations of listed and sensitive plants and wildlife | Less than significant | All Action Alternatives | <ul style="list-style-type: none"> No mitigation required. Bio CMAs provide for avoidance and minimization of impacts to biological resources so significant impacts are not anticipated | LTS |
| Impact BR-8: Construction of generation facilities or transmission lines would result in increased predation of listed and sensitive wildlife species | Significant | No Action Alternative | <ul style="list-style-type: none"> Potential effects of increased predation would be avoided and minimized through the implementation of existing applicable laws and regulations and implementation of typical mitigation | LTS |
| | Less than significant | All Action Alternatives | <ul style="list-style-type: none"> No mitigation required. Bio CMAs provide for avoidance and minimization of impacts to biological resources so significant impacts are not anticipated | LTS |
| Impact BR-9: Operational activities would result in avian and bat injury and mortality from collisions, thermal flux, or electrocution at generation and transmission facilities | Less than significant | All Action Alternatives | <ul style="list-style-type: none"> No mitigation required. Bio CMAs provide for avoidance and minimization of impacts to biological resources so significant impacts are not anticipated | LTS |

**Table IV.26-3
 Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|-------------------------|---|------------------------------------|
| <i>Cultural Resources</i> | | | | |
| Impact CR-1: Plan components could affect historic and built-environment resources | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Treatment plans, personnel training, use of cultural and tribal monitors, BMPs for visual effects, data recovery, dust control, vibration reduction, recordation, conservation easements, technical reports, compensatory mitigation | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • CR-1a: Protect Historic Archaeological and Built Environment Resources | LTS |
| <i>Paleontological Resources</i> | | | | |
| Impact PR-1: Land disturbance could result in loss, damage, or destruction of significant paleontological resources | Significant | All Action Alternatives | <ul style="list-style-type: none"> • PR-1a: Protect Paleontological Resources | LTS |
| Impact PR-2: Construction and operations activities could increase the rate of erosion or alter drainage patterns removing significant paleontological resources from their context | LTS | All Alternatives | <ul style="list-style-type: none"> • No mitigation required (beyond typical soil erosion and flood protection measures; See Chapters IV.4 and IV.5) | LTS |
| Impact PR-3: Increased human access to significant paleontological resources could result in unauthorized collection or vandalism | LTS | All Alternatives | <ul style="list-style-type: none"> • No mitigation required (beyond typical soil erosion and flood protection measures; See Chapters IV.4 and IV.5) | LTS |
| <i>Land Use</i> | | | | |
| Impact LU-1: Plan components would conflict with existing and planned land uses and related plans and policies | LTS | No Action Alternative | Typical mitigation measures for protection of agriculture, air quality, noise and vibration, visual resources, transportation, public safety, and soils and geology | LTS |

**Table IV.26-3
 Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|---|-------------------------------------|-------------------------|---|------------------------------------|
| | | All Action Alternatives | <ul style="list-style-type: none"> • LU-1a: Minimize Inconsistencies with Local Agency Plans and Policies • Mitigation measures for protection of agriculture, air quality, noise and vibration, visual resources, transportation, public safety, and soils and geology | LTS |
| <i>Agricultural Resources</i> | | | | |
| Impact AG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair agricultural use of adjacent agricultural operations | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Solar PEIS Design Features and mitigation measures for protection of water quality, and control of air pollution and hazardous materials | LTS |
| | | All Action Alternatives | <ul style="list-style-type: none"> • AG-1a: Minimize Impacts to Agricultural Resources | LTS |
| <i>Mineral Resources</i> | | | | |
| Impact MR-1: Plan components would reduce or improve access to and development of known and future mineral resources | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Coordinate with mine claim or lease holders • Site projects to avoid effects on mineral resources | LTS |
| | | Preferred Alternative | For renewable energy development: <ul style="list-style-type: none"> • MR-1a: Coordinate to Ensure Access to Mineral Resources [note That Impacts of the Reserve Design Would Be Significant and Unmitigable; see Table IV.26-2] | LTS |
| <i>Livestock Grazing</i> | | | | |
| Impact LG-1: Alternative would result in loss of livestock grazing acres | LTS | No Action Alternative | No mitigation required due to the large amount of grazing land remaining in the Plan Area | LTS |
| | Significant | All Action Alternatives | LG-1a: Minimize Impacts on Livestock Grazing | LTS |

**Table IV.26-3
Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|-------------------------|--|------------------------------------|
| Impact LG-2: Alternative would involve other changes in the existing environment which, due to their location or nature, would impair use of adjacent grazing lands | LTS | No Action Alternative | No mitigation required because Solar PEIS Design Features and existing regulations protect grazing lands | LTS |
| | Significant | All Action Alternatives | See mitigation measures for Impact LG-1 (above) | LTS |
| <i>Outdoor Recreation</i> | | | | |
| Impact OR-2: Plan components could enhance or degrade access to lands managed for recreation | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Maintain public access • Restore or enhance other recreational areas or OHV routes to compensate for loss of access or value caused by development | LTS |
| | Less than significant | All Action Alternatives | No mitigation required. CMAs effectively protect recreational resources | LTS |
| Impact OR-3: Plan components would enhance management of focus areas for recreation | No impact | No Action Alternative | No new recreation areas would be developed under the No Action Alternative | n/a |
| | n/a | All Action Alternatives | No mitigation required. The designation of large amounts of recreation lands through the Plan would be beneficial | Beneficial |
| <i>Transportation & Public Access</i> | | | | |
| Impact TR-1: Plan components would modify local circulation patterns or degrade the performance of the local road network | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Implement local road improvements, stagger work schedules, shift work hours to off-peak commuting times, or implement rideshare or shuttle programs • Implement traffic control measures (intersection realignment, lights or signage, and turn lanes) | LTS |

**Table IV.26-3
Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|-------------------------|---|------------------------------------|
| | | All Action Alternatives | TR-1a: Implement a Transportation Plan TR-1b: Coordinate Road Improvements with Local Authorities TR-1c: Implement Traffic Control Measures TR-1d: Ensure Proper Signage and Travel Management | LTS |
| Impact TR-2: Plan components would alter the availability or accessibility of BLM routes of travel | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Require easements for public roadway corridors through project sites • Implement BLM standards for road design, construction, and maintenance • Require use of existing roads where possible | LTS |
| | | All Action Alternatives | TR-2a: Adhere to Road Construction Standards TR-2b: Provide Access Through Large Sites TR-2c: Restore Unneeded Roads | LTS |
| Impact TR-3: Plan components would result in substantial traffic volumes on highway segments designated as part of a Congestion Management Plan (CMP) | Less than significant | All Alternatives | No mitigation required. Traffic levels would be within road network capacity and would occur primarily outside of developed areas. | LTS |
| Impact TR-4: Plan components would increase hazards and the risk for a traffic incident or inhibit emergency response | Significant | No Action Alternative | See mitigation measures for Impacts TR-1 and TR-2 (above) | LTS |
| | | All Action Alternatives | TR-4a: Provide On-site Laydown and Staging TR-4b: Control Site Access TR-4c: Repair Project-Related Damage | LTS |

**Table IV.26-3
Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|-------------------------|--|------------------------------------|
| <i>Visual Resources</i> | | | | |
| Impact VR-1: Visibility of activities, materials, equipment, dust, and construction night lighting would result in short-term diminished scenic quality | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Avoid unnecessary ground disturbance • Control dust and erosion • Restore and manage disturbed land and vegetation • Restore and reclaim areas as soon as feasible | LTS |
| | | All Action Alternatives | No mitigation required. CMAs and existing guidance is adequate | LTS |
| <i>Noise and Vibration</i> | | | | |
| Impact NV-1: Plan components would generate noise that would adversely affect sensitive receptors | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Conducting baseline noise measurements, limiting noisy activities to least sensitive times of day • Sound control devices on equipment • Notification of residents and location away from receptors • Specific noise controls for solar, geothermal, and wind projects | LTS |
| | | All Action Alternatives | NV-1a: Protect Sensitive Receptors from Noise NV-1b: Implement Noise Reduction Techniques NV-1c: Protect Residences from Wind Turbine Noise | LTS |
| Impact NV-2: Plan components would generate ground-borne vibrations that adversely affect sensitive receptors | Less than significant | All Alternatives | No mitigation required. Vibration would not be detectable beyond project site boundaries | LTS |
| Impact NV-3: Plan components would generate noise or ground-borne vibration levels in conflict with local standards | Significant | No Action Alternative | See typical mitigation measures for Impact NV-1 (above) | LTS |
| | | All Action Alternatives | Mitigation Measures NV-1a, NV-1b, and NV-1c (above) | LTS |

**Table IV.26-3
Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|--|-------------------------------------|-------------------------|---|------------------------------------|
| <i>Public Safety and Services</i> | | | | |
| Impact PS-1: Plan components would involve hazardous materials or conditions that could result in a hazard to the public or environment | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Conduct database search and site characterization; remediate as required • Develop a Hazardous Materials and Waste Management Plan, Spill Prevention and Emergency Response Plan; Health and Safety Plan • Implement strict dust control measures to avoid spread of Valley Fever spores • Provide operational controls to avoid bacterial growth in cooling towers | LTS |
| | | All Action Alternatives | PS-1a: Implement Hazardous Material and Waste Minimization Measures | LTS |
| Impact PS-2: Plan components could result in an airport or air traffic safety hazard | LTS | All Alternatives | No mitigation required. Regulations require coordination with Federal Aviation Administration | LTS |
| Impact PS-3: Plan components would create an increased risk of wildland fire | Significant | No Action Alternatives | Typical mitigation includes: <ul style="list-style-type: none"> • Develop Fire Management and Protection Plans | LTS |
| | | All Action Alternatives | PS-3a: Prepare a Fire Management and Protection Plan | LTS |
| Impact PS-4: Plan components would create a demand for new or expanded police, fire, and emergency service facilities | Significant | No Action Alternative | Typical mitigation includes: <ul style="list-style-type: none"> • Coordinate with fire-rescue department and EMS responders to ensure adequate equipment and personnel for responses to emergency calls | LTS |
| | | All Action Alternatives | PS-4a: Coordinate with Emergency Response Agencies | LTS |

**Table IV.26-3
Summary of Less Than Significant Impacts Under CEQA**

| Impact | Impact Conclusion Before Mitigation | Alternative | Proposed Mitigation | Impact Conclusion After Mitigation |
|---|-------------------------------------|-------------------------|--|------------------------------------|
| Impact PS-5: Plan components would generate solid waste and result in a need for new or expanded landfills | Significant | No Action Alternative | Typical mitigation includes: • Prepare Waste Management Plans to identify recycling, reuse, and other landfill diversion methods | LTS |
| | | All Action Alternatives | PS-5a: Complete a Waste Management Plan for Construction and Decommissioning | LTS |
| <i>Socioeconomics & Environmental Justice</i> | | | | |
| Impact SE-1: Plan components may induce substantial population growth, either directly or indirectly | Potentially Significant | No Action Alternative | Typical mitigation includes: • Local hiring practices and job training | LTS |
| | | All Action Alternatives | SE-1a: Project Socioeconomic Analysis and Mitigation SE-1b: Provide Temporary Housing | LTS |
| Impact SE-2: Plan components may displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere | Less than significant | No Action Alternative | Typical mitigation includes: • Residential property acquisition and relocation must be consistent with all state, local, or other jurisdictions' requirements • On-site temporary housing provisions or local coordination for housing | LTS |
| | | All Action Alternatives | No mitigation required. Residential properties are rarely acquired by developers due to their higher cost. | LTS |
| Impact SE-6: Plan effects would be disproportionately borne by minority or low-income populations | Significant | No Action Alternative | Typical mitigation includes: • Public outreach specifically designed to engage minority and low-income populations | LTS |
| | Significant | All Action Alternatives | SE-6a: Project Environmental Justice Analysis and Mitigation | Likely LTS |

IV.26.1.2 Significant Irreversible Environmental Changes

CEQA requires that irreversible commitments of nonrenewable resources be evaluated in an EIR to ensure that current consumption is justified (14 CCR Section 15126.2[c]). A similar requirement applies under NEPA (40 Code of Federal Regulations [CFR] 1502.16), and is addressed in Section IV.26.2.3.

Generally, irreversible and irretrievable commitments of resources cannot be changed once a change is made. A change is irreversible when an action uses or alters a resource so that restoration of that resource to its original condition is not possible, even with mitigation. An irreversible commitment of resources would occur when the direct or indirect effects of a project limit future land use options, or when resources are either removed or consumed so that they are no longer available for future use.

Construction of renewable energy projects under the DRECP or in the No Project Alternative would require amendments to existing plans, policies, and land use designations. While the Plan would streamline the permitting of renewable energy and transmission facilities, future project-level CEQA documents would address consumption of some resources specific to each project, including:

- Land altered permanently and occupied for an extended period by facilities developed for renewable energy production and transmission.
- Land permanently set aside for habitat conservation and preservation.
- Nonrenewable energy (fossil fuels and other sources of nonrenewable electricity), oils, and lubricants used (1) in the operation of equipment and vehicles during construction, ongoing facility operations, and maintenance; and (2) in the production and shipping of glass, wire, concrete, aggregate, steel, and other construction materials.
- Consumption of raw materials to produce wire, glass, concrete, aggregate, steel, and other construction materials required for the construction of photovoltaic panels, heliostats, wind turbines, foundations, structures, fencing, and other energy-capturing and electric transmission project components.

The construction and operation of renewable energy projects would commit land to new uses for extended periods. This represents a long-term, indeterminate commitment of land to these uses, and decreases the amount of land available for other uses. In addition, public access, which could cause land damage, could be limited to authorized personnel, so disturbance of these lands would be reduced.

Physical disturbance of the land surface and subsurface through grading or other means would severely alter or destroy existing site conditions. Land surface and subsurface characteristics would be permanently altered, and species currently residing on or otherwise using the site would be displaced. With decommissioning and removal of facilities, the landscape could not be fully restored to its pre-project condition. Even with implementation of a post-decommissioning restoration effort, re-establishment to pre-project conditions (e.g., desert pavement) could take centuries if not millennia.

Under the DRECP, certain public lands would be conserved as habitat for various species, as recreation areas, or as places of cultural and tribal importance. Private lands may also be acquired for this purpose. More restrictive designations on certain lands would limit land use for other purposes and limit types of access on these lands. Specific restoration and mitigation requirements for individual projects have not been specified since their precise locations have not yet been identified; therefore, although conservation may be required as mitigation, it is not possible to quantify the areal extent or locations of specific habitats on private land that would be preserved through these actions. This would depend upon both willing sellers and the suitability of the land for intended conservation and mitigation.

Implementation of the DRECP and the subsequent construction of renewable energy and transmission facilities would possibly require time and expenditures from jurisdictional agencies for (1) oversight and inspections during project construction; (2) agency-related activities associated with project operations, maintenance, and decommissioning; and (3) the protection, operation, and periodic maintenance of conserved habitat areas. If ongoing funding for these long-term agency activities is not specified and provided as part of a project's approval process, future generations could be obligated to meet these ongoing expenditures.

IV.26.1.3 Growth-Inducing Impacts

CEQA Guidelines require that an EIR discuss how a proposed project would foster economic or population growth and increase the need (either directly or indirectly) for additional housing in a project's surrounding environment (14 CCR Section 15126.2[d]).

Increases in population may require construction of new community facilities, which could significantly affect the environment. NEPA also requires an analysis of growth-inducing effects (40 CFR 1508.8[b]).

As described in Chapter IV.23, Section IV.23.3.2.6 (Impact SE-1), the adoption of the DRECP would not cause population growth, either directly or indirectly. While constructing renewable energy and transmission facilities is labor intensive, it is of short duration. During construction, there would be a short-term but multiyear increase in the need for local temporary housing. Labor needs would not likely be completely met by

workers already located within commuting distance of a project site, so would require immigration of workers who would need short-term or temporary housing. Typically, such housing is in trailers, hotels, or in rented houses or rooms in nearby communities. Crews experienced in remote-site facility construction often bring their own trailers to a project site for the duration of the work, then return to their permanent homes upon completion of that work. Families of these workers typically do not relocate for short-term projects. As stated in Chapter IV.23, Section IV.23.3.2.1.1, operations and maintenance of the new generation facilities would require minimal permanent staff. There should therefore be little to no need for additional temporary or permanent housing, as well as no significant increase in permanent populations.

IV.26.1.4 Energy Conservation

CEQA requires an explanation of the potential energy impacts of Plan implementation, with an emphasis on avoiding or reducing inefficient, wasteful, or unnecessary energy consumption. Achieving this CEQA goal includes: (1) decreasing overall per capita energy consumption, (2) decreasing reliance on fossil fuels, and (3) increasing use of renewable energy sources (14 CCR, Appendix F).

While renewable energy facilities do not reduce the total number of kilowatt hours of electricity used per capita, displacing some fossil-fueled generation reduces the per capita consumption of energy from nonrenewable sources. A key goal of the DRECP is to streamline the siting and construction of renewable energy and transmission projects by systematizing the permitting process. Under the DRECP, these projects may come on line sooner than without the Plan. As a result, this earlier generation of electricity from renewable resources would avoid the additional consumption of nonrenewable fossil fuels that would have been needed to produce an equivalent amount of electricity.

During project site preparation, energy will be needed to power equipment and vehicles, deliver building materials, and build the facilities. The State of California and the U.S. Environmental Protection Agency have jointly established operational efficiency and emissions standards and a certification program for vehicles and engines used in off-road diesel-fueled construction equipment. By improving equipment efficiency, less fuel is required per unit of work when compared with older, less efficient equipment. By requiring that equipment used during project construction meet current fuel-efficiency standards, individual renewable energy projects would in turn be fuel efficient during construction. Limiting idling time for construction equipment, trucks, and vans would also reduce fuel consumption.

Overall, implementation of the DRECP would further California's statewide goal to increase renewable energy production in several key respects. The Plan would provide clarity to potential project developers by streamlining the development process from beginning to

end: outlining the permitting process, clearly showing, in advance, locations designated for development, and fulfilling mitigation requirements.

IV.26.2 NEPA Requirements

NEPA regulations (40 CFR Section 1500-1502 et seq.) require that an EIS discuss and analyze the following:

- The relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity (40 CFR 1502.16).
- Any irreversible or irretrievable commitments of resources, if the project is developed (40 CFR 1502.16).
- Energy requirements and the conservation potential of various alternatives and mitigation measures (40 CFR 1502.16[e]).
- Indirect effects, including growth-inducing effects (40 CFR 1502.16[b], 1508.8[b]).
- Possible conflicts between proposed actions and the objectives of federal, state, local, or tribal land use plans, policies, and controls (40 CFR 1502.16[c]).

The following sections address these NEPA requirements.

IV.26.2.1 Relationship of Short-Term Uses of the Environment and Long-Term Productivity

NEPA regulations (40 CFR 1502.16), the BLM NEPA Handbook (H-1790-1), and the U.S. Fish and Wildlife Service Manual (550 FW 2.4) all require discussion of the relationship between short-term uses of the human environment and the maintenance and enhancement of long-term productivity, should a project be developed.

For purposes of this discussion, “short term” refers to the project construction period—the multiyear period when (1) individual renewable energy and transmission projects are built, (2) habitat preservation and management designations are developed, and (3) other related actions are undertaken. “Long term” refers to the indefinite period beyond initial facility construction. It includes ongoing operations, maintenance, and decommissioning.

The specific impacts of the DRECP would vary in type, intensity, location, and duration, depending upon activities occurring at any given time. Implementation of the Plan would unavoidably require trade-offs between short-term uses of the environment and long-term productivity.

Implementation of the DRECP would accelerate attainment of both the state's short-term and long-term renewable energy goals and habitat preservation and management objectives, but at the expense of some long-term impacts.

Short-term impacts include:

- Economic losses from changes in recreational uses and other potential alternative uses of the land.
- Construction impacts such as noise, dust, traffic delays, detours, and nesting bird disturbances.
- Recreational impacts such as reduction or elimination of access to certain lands.
- Air quality impacts, including exceeding state and federal emission standards.

Short-term benefits include:

- Increased jobs and revenue generated during construction.

Long-term impacts include:

- Loss of plant and wildlife resources.
- Loss of grazing land and mineral resources.
- Loss of open space.
- Loss of visual quality.
- Increased noise (primarily at wind or geothermal facilities).
- Consumption of construction materials and energy to build and operate facilities.
- Loss of or restricted access to cultural and archaeological sites.

Long-term benefits include:

- Achieving the state's renewable energy production goals.
- Access to renewable energy supplies.
- Increased protection for certain habitats.
- Designation of additional public lands for recreation and for limited development.
- Designation of additional public lands for conservation purposes such as National Conservation Lands, Areas of Critical Environmental Concern, and wildlife allocations.

Under the No Action Alternative, without the DRECP, projects would receive approvals and permits through existing programs, in a manner consistent with past procedures and programs. Some of these programs and their related policies would restore or preserve sensitive habitat through mitigation requirements, and some could also cause some of the losses just listed. However, the No Action Alternative, which would perpetuate the status quo, would neither provide the DRECP's comprehensive approach to project siting nor minimize adverse impacts to habitats and species in the Plan Area.

IV.26.2.2 Irreversible and Irretrievable Commitment of Resources

NEPA regulations (40 CFR 1502.16), the BLM NEPA Handbook (H-1790-1), and the U.S. Fish and Wildlife Manual (550 FW 2.4) all require discussions of both adverse effects that cannot be avoided, and irreversible and irretrievable commitments of resources (assuming a project is developed). The discussion in Section VI.26.1.2 (Significant Irreversible Environmental Changes, required under CEQA), applies to the irreversible and irretrievable commitment of resources, which is also required under NEPA.

IV.26.2.3 Energy Requirements and Conservation Potential of Various Alternatives and Mitigation Measures

NEPA also requires discussion of energy requirements and the conservation potential of alternatives and mitigation measures (40 CFR 1502.16[e]). All of the Plan's action alternatives have essentially the same energy requirements during construction and operation of renewable energy and transmission facilities. The DRECP identifies areas suitable for project development, but does not require that they be built. If built, these projects would require energy to produce and deliver construction materials, prepare project sites, and build the facilities. As described in Section IV.26.1.4 (Energy Conservation), existing programs already mandate greater fuel efficiency for construction equipment. The required use of fuel-efficient equipment and other strategies would help mitigate energy consumption impacts from construction.

California has many programs in place to reduce energy demand by reducing usage and decreasing demand. A few examples include enhanced efficiency of new buildings, installation of solar panels, higher efficiency standards for electrical equipment and appliances, and increased consumer awareness of energy usage. Increasing the percentage of electricity generated from renewable energy sources strengthens and complements all of these conservation and efficiency programs. More power from renewable sources is a critical component of California's progressive, overall strategy to reduce fossil-fuel dependence and the related need to build more fossil-fueled power plants.

California leads the nation with the lowest per capita consumption of electricity of all the states. However, with continuing population growth and an expanding economy, California's

need for additional power continues. While per capita consumption has not increased, total demand continues to rise. Efficiency and conservation help offset increased energy demand, but are not sufficient to meet it; new power sources are also needed. In recognition of this need, state law now requires that statewide energy demand be met with increasingly large percentages of renewable energy resource generation.

Adoption of the Preferred Alternative or another action alternative increases the likelihood that renewable energy facilities will be built and on line sooner than they would be without the Plan. Though state and federal policies and programs would continue to encourage development of renewable energy facilities under the No Action Alternative, projects may take longer to come on line, requiring the generation of more fossil-fueled energy in the interim.

IV.26.2.4 Indirect Effects Including Growth-Inducing Effects

NEPA requires an analysis of indirect effects, including growth-inducing effects (40 CFR 1508.8[b]). Indirect effects include induced changes in patterns of land use, population density or growth rates, and related effects on air, water, and other natural systems, including ecosystems.

This required analysis is similar to CEQA requirements discussed in Section IV.26.1.3 (Growth-Inducing Impacts). Implementation of the DRECP would streamline renewable energy and transmission project development. Construction of these facilities requires a large temporary workforce that typically does not permanently relocate to project areas. This workforce would instead be drawn from local and regional labor markets, or from specialized labor pools that migrate to job sites throughout the country. Because of the relatively short construction period, families typically do not relocate with these workers. This temporary workforce would therefore not induce population growth. Lacking a need for either additional permanent housing or additional commercial and public facilities and services, there would be little to no induced change in land use from this temporary workforce.

As described in Chapter IV.23, Section IV.23.3.2.6 (Impact SE-1), operations and maintenance of the new facilities would require minimal permanent staff. There should therefore be little to no need for additional housing, as well as no significant increase in permanent populations.

Respective resource topic chapters in Volume IV analyze the direct and indirect effects of renewable energy project development. Examples of indirect effects include increased demand for fuel, food, lodging, and other locally available materials. Because these increases would be limited to the construction period, they are not expected to permanently increase demand for new facilities or businesses.