Appendix 2C Applicable CMAs and Compliance Summary

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2C.1 LUPA WIDE CMAS

2C.1.1 Biological Resources

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Biological Resources	LUPA- BIO-1	Conduct a habitat assessment (see Glossary of Terms) of Focus and BLM Special Status Species' suitable habitat for all activities and identify and/or delineate the DRECP vegetation types, rare alliances, and special features (e.g., Aeolian sand transport resources, Joshua tree, microphyll woodlands, carbon sequestration characteristics, seeps, climate refugia) present using the most current information, data sources, and tools (e.g., DRECP land cover mapping, aerial photos, DRECP species models, and reconnaissance site visits) to identify suitable habitat (see Glossary of Terms) for Focus and BLM Special Status Species. If required by the relevant species-specific CMAs, conduct any subsequent protocol or adequate presence/ absence surveys to identify species occupancy status and a more detailed mapping of suitable habitat to inform siting and design considerations. If required by relevant species-specific CMAs, conduct analysis of percentage of impacts to suitable habitat and modeled suitable habitat.	Section 3.5 Section 4.5	Compliance with this CMA is achieved through data contained in the Biological Resources Technical Reports (including rare plant studies), which is incorporated into Chapter 3 and Appendix 3 of this EIS, and analysis presented in Chapter 4 and Appendix 4. Additional preconstruction studies along the Selected Alternative route in California would be undertaken for rare plants (APM-BIO-24 and BMP-BIO-31), protected plants (BMP-BIO-11), rare vegetation alliances (APM-BIO-24), riparian and xeroriparian habitat (APM-BIO-13), Mojave fringe-toed lizard (APM-BIO-25 and BMP-BIO- 49), desert tortoise (APM/BMP-BIO-23), burrowing owl (APM-BIO-25 and APM-BIO-30), nesting migratory birds (APM-BIO-30), dune vegetation (BMP-BIO-53) and sand transport corridors (BMP-BIO-54).
		BLM will not require protocol surveys in sites determined by the designated biologist to be unviable for occupancy of the species, or if baseline studies inferred absence during the current or previous active season.		

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	Utilize the most recent and applicable assessment protocols and guidance documents for vegetation types and jurisdictional waters and wetlands that have been approved by BLM, and the appropriate responsible regulatory agencies, as applicable.		
	LUPA- BIO-2	Designated biologist(s) (see Glossary of Terms), will conduct, and oversee where appropriate, activity-specific required biological monitoring during pre-construction, construction, and decommissioning to ensure that avoidance and minimization measures are appropriately implemented and are effective. The appropriate required monitoring will be determined during the environmental analysis and BLM approval process. The designated biologist(s) will submit monitoring reports directly to BLM.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-02 and BMP-BIO-02.
Resource Setback Standards	LUPA- BIO-3	Resource setbacks (see Glossary of Terms) have been identified to avoid and minimize the adverse effects to specific biological resources. Setbacks are not considered additive and are measured as specified in the applicable CMA. Allowable minor incursions (see Glossary of Terms), as per specific CMAs do not affect the following setback measurement descriptions. Generally, setbacks (which range in distances for different biological resources) for the appropriate resources are measured from:	Section 4.5.7 Appendix 2A	The CDCA Plan would be further amended to eliminate this setback for sensitive plants for the Project. Compliance with this CMA is achieved, in part, through application of APM-BIO-04, APM-BIO-11, BMP-BIO-31, BMP-BIO-50, and BMP-BIO-52.
		• The edge of each of the DRECP desert vegetation types, including but not limited to those in the riparian or wetland vegetation groups (as defined by alliances within the vegetation type descriptions and mapped based on the vegetation type habitat assessments described in LUPA-BIO-1).		
		 The edge of the vegetation extent for specified Focus and BLM sensitive plant species. The edge of suitable habitat or active nest substrates for the appropriate Focus and BLM Special Status Species. 		

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Seasonal Restrictions	LUPA- BIO-4	For activities that may impact Focus and BLM Special Status Species, implement all required species-specific seasonal restrictions on pre- construction, construction, operations, and decommissioning activities.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-20, BMP-BIO-31, and BMP-BIO-32.
		Species-specific seasonal restriction dates are described in the applicable CMAs.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-32.
		Alternatively, to avoid a seasonal restriction associated with visual disturbance, installation of a visual barrier may be evaluated on a case-by-case basis that will result in the breeding, nesting, lambing, fawning, or roosting species not being affected by visual disturbance from construction activities subject to seasonal restriction. The proposed installation and use of a visual barrier to avoid a species seasonal restriction will be analyzed in the activity/project specific environmental analysis.	Appendix 2A Section 4.5	The use of visual barriers is allowed for nesting migratory birds when included in the nest management plan (Appendix 2B) in accordance with AMP BIO-20 and BMP-BIO-29.

CATEGORY	CMA#	СМА ТЕХТ	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY								
Worker Education	LUPA- BIO-5	All activities, as determined appropriate on an activity-by-activity basis, will implement a worker education program that meets the approval of the BLM. The program will be carried out during all phases of the project (site mobilization, ground disturbance, grading, construction, operation, closure/decommissioning or project abandonment, and restoration/reclamation activities). The worker education program will provide interpretation for non-English speaking workers and provide the same instruction for new workers prior to their working on site. As appropriate based on the activity, the program will contain information about:	Appendix 2A Section 2.2.7.2	Compliance with this CMA is achieved through application of APM/BMP-BIO-01. Required worker training would be Included as a part of the Environmental Health and Safety Plan (Appendix 2B).								
		Site-specific biological and nonbiological resources.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-01.								
		 Information on the legal protection for protected resources and penalties for violation of federal and state laws and administrative sanctions for failure to comply with LUPA CMA requirements intended to protect site-specific biological and nonbiological resources. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-01.								
										The required LUPA and project-specific measures for avoiding and minimizing effects during all project phases, including but not limited to resource setbacks, trash, speed limits, etc.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-01.
		Reporting requirements and measures to follow if protected resources are encountered, including potential work stoppage and requirements for notification of the designated biologist.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-01.								
		Measures that personnel can take to promote the conservation of biological and nonbiological resources.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-01.								

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Subsidized Predators Standards	LUPA- BIO-6	Subsidized predator standards, approved by BLM, in coordination with the USFWS and CDFW, will be implemented during all appropriate phases of activities, including but not limited to renewable energy activities, to manage predator food subsidies, water subsidies, and breeding sites including the following:	Appendix 2A Section 4.5	
		Common Raven management actions will be implemented for all activities to address food and water subsidies and roosting and nesting sites specific to the Common Raven. These include identification of monitoring reporting procedures and requirements; strategies for refuse management; as well as design strategies and passive repellant methods to avoid providing perches, nesting sites, and roosting sites for Common Ravens.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of AMP BIO-05, AMP BIO-06, and BMP-BIO-28.
		The application of water and/or other palliatives for dust abatement in construction areas and during project operations and maintenance will be done with the minimum amount of water necessary to meet safety and air quality standards and in a manner that prevents the formation of puddles, which could attract wildlife and wildlife predators.	Appendix 2A Section 4.5.4	Compliance with this CMA is achieved through application of BMPs AQ-01 and BIO-34.
		Following the most recent national policy and guidance, BLM will take actions to not introduce, dispose of, or release any non-native species into areas of native habitat, suitable habitat, and natural or artificial waterways/water bodies containing native species.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12 and BMP-BIO-31.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	All activity work areas will be kept free of trash and debris. Particular attention will be paid to "micro-trash" (including such small items as screws, nuts, washers, nails, coins, rags, small electrical components, small pieces of plastic, glass or wire, and any debris or trash that is colorful or shiny) and organic waste that may subsidize predators. All trash will be covered, kept in closed containers, or otherwise removed from the project site at the end of each day or at regular intervals prior to periods when workers are not present at the site.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-06.
		• In addition to implementing the measures above on activity sites, each activity will provide compensatory mitigation that contributes to LUPA-wide raven management.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-28.
Restoration of Areas Disturbed by Construction Activities but Not Converted by Long-Term Disturbance	LUPA- BIO-7	Where DRECP vegetation types or Focus or BLM Special Status Species habitats may be affected by ground- disturbance and/or vegetation removal during pre-construction, construction, operations, and decommissioning related activities but are not converted by long-term (i.e., more than two years of disturbance, see Glossary of Terms) ground disturbance, restore these areas following the standards, approved by BLM authorized officer, following the most recent BLM policies and procedures for the vegetation community or species habitat disturbance/impacts as appropriate, summarized below:	Section 4.5.4 Section 4.5.5 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		• Implement site-specific habitat restoration actions for the areas affected including specifying and using:	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		 The appropriate seed (e.g., certified weed- free, native, and locally and genetically appropriate seed) 	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	 Appropriate soils (e.g., topsoil of the same original type on site or that was previously stored by soil type after being salvaged during excavation and construction activities) 	Section 4.3.4 Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM/BMP-BIO-15 and BMP-SOIL-3.
		o Equipment	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		o Timing (e.g., appropriate season, sufficient rainfall)	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		o Location	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		Success criteria	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		Monitoring measures	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		 Contingency measures, relevant for restoration, which includes seeding that follows BLM policy when on BLM administered lands. 	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		• Salvage and relocate cactus, nolina, and yucca from the site prior to disturbance using BLM protocols. To the maximum extent practicable for short-term disturbed areas (see Glossary of Terms), the cactus and yucca will be re-planted back to the original site.	Section 4.5.7 Appendix 2A	Compliance with this CMA is achieved through application of APM/BMP-BIO-11, APM/BMP-BIO-15 and BMP-BIO-41.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	• Restore and reclaim short-term (i.e. 2 years or less, see Glossary of Terms) disturbed areas, including pipelines, transmission projects, staging areas, and short-term construction-related roads immediately or during the most biologically appropriate season as determined in the activity/project specific environmental analysis and decision, following completion of construction activities to reduce the amount of habitat converted at any one time and promote recovery to natural habitats and vegetation as well as climate refugia and ecosystem services such carbon storage.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
General Closure and Decommissioni ng Standards	LUPA- BIO-8	All activities that are required to close and decommission the site (e.g., renewable energy activities) will specify and implement project-specific closure and decommissioning actions that meet the approval of BLM, and that at a minimum address the following:	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		• Specifying and implementing the methods, timing (e.g., criteria for triggering closure and decommissioning actions), and criteria for success (including quantifiable and measurable criteria).	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		Recontouring of areas that were substantially altered from their original contour or gradient and installing erosion control measures in disturbed areas where potential for erosion exists.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
		 Restoring vegetation as well as soil profiles and functions that will support and maintain native plant communities, associated carbon sequestration and nutrient cycling processes, and native wildlife species. 	Appendix 2A	Compliance with this CMA is achieved through application of APM/BMP-BIO-11, APM/BMP-BIO-15.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	Vegetation restoration actions will identify and use native vegetation composition, native seed composition, and the diversity to values commensurate with the natural ecological setting and climate projections.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-15.
Water and Wetland Dependent Species Resources	LUPA- BIO-9	 Implement the following general LUPA CMA for water and wetland dependent resources: Implement construction site standard practices to prevent toxic chemicals, hazardous materials, and other fluids from entering vegetation type streams, washes, and tributary networks through water runoff, erosion, and sediment transport by, at a minimum, implementing the following: 	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-08, APM-BIO-07, APM-BIO-10, and APM-HAZ-01.
		 On project sites, vehicles and other equipment will be maintained in proper working condition and only stored in designated containment areas where runoff is collected or controlled and that are located outside of streams, washes, and distributary networks to minimize accidental fluids and hazardous materials spills. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-HAZ-01.
		 Hazardous material leaks, spills, or releases will be immediately cleaned and equipment will be repaired upon identification. Removal and disposal of spill and related clean- up materials will occur at an approved off-site landfill. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-08 and APM-HAZ-01.
		 Maintenance and operations vehicles will carry the appropriate equipment and materials to isolate, clean up, and repair any hazardous material leaks, spills, or releases. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-08 and BMP-HAZ-03.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	 Activity-specific drainage, erosion, and sedimentation control actions, which meet the approval of BLM and the applicable regulatory agencies, will be carried out during all appropriate phases of the approved project. These actions, as needed, will address measures to ensure the proper protection of water quality, site-specific stormwater and sediment retention, and design of the project to minimize site disturbance, including the following: 	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-10, BMP-BIO-38, and APM-WQ-01.
		 Identify site-specific surface water runoff patterns and implement measures to prevent excessive and unnatural soil deposition and erosion. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-WQ-01.
		 Implement measures to maintain natural drainages and to maintain hydrologic function in the event drainages are disturbed. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-WQ-01.
		 Reduce the amount of area covered by impervious surfaces through use of permeable pavement or other pervious surfaces. Direct runoff from impervious surfaces into retention basins. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-WQ-01.
		 Stabilize disturbed areas following grading in the manner appropriate to the soil type so that wind or water erosion is minimized. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-WQ-01. The CA portion of the Project Area is scheduled for soil survey in the near future. Updated soils data would be incorporated in the EIS when available and analysis and BMPs updated as needed.
		 Minimize irrigation runoff by using low or no irrigation native vegetation landscaping for landscaped retention basins. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-WQ-01.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	Conduct regular inspections and maintenance of long-term erosion control measures to ensure long-term effectiveness.	Appendix 2A	Compliance with this CMA is achieved through application of APM-WQ-01.
Standard Practices for Weed Management	LUPA- BIO-10	Consistent with BLM state and national policies and guidance, integrated weed management actions, will be carried out during all phases of activities, as appropriate, and at a minimum will include the following:	Section 2.2 Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12 and the Noxious Weed Management Plan (Appendix 2B).
		Thoroughly clean the tires and undercarriage of vehicles entering or reentering the project site to remove potential weeds.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12.
		Store project vehicles on site in designated areas to minimize the need for multiple washings whenever vehicles re-enter the project site.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12.
		Properly maintain vehicle wash and inspection stations to minimize the introduction of invasive weeds or subsidy of invasive weeds.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12.
		Closely monitor the types of materials brought onto the site to avoid the introduction of invasive weeds and non-native species.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12.
		Reestablish native vegetation quickly on disturbed sites.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12 and APM-BIO-15.
		 Monitor and quickly implement control measures to ensure early detection and eradication of weed invasions to avoid the spread of invasive weeds and non-native species on site and to adjacent off-site areas. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12.
		Use certified weed-free mulch, straw, hay bales, or equivalent fabricated materials for installing sediment barriers.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Nuisance Animals and Invasive Species	LUPA- BIO-11	Implement the following CMAs for controlling nuisance animals and invasive species:	Section 2.2.7 Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12 and the Noxious Weed Management Plan (Appendix 2B).
		No fumigant, treated bait, or other means of poisoning nuisance animals including rodenticides will be used in areas where Focus and BLM Special Status Species are known or suspected to occur.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12.
		• Manage the use of widely spread herbicides and do not apply herbicides effective against dicotyledonous plants within 1,000 feet from the edge of a 100-year floodplain, stream and wash channels, and riparian vegetation or to soils less than 25 feet from the edge of drains. Exceptions will be made when targeting the base and roots of invasive riparian species such as tamarisk and <i>Arundo donax</i> (giant reed). Manage herbicides consistent with the most current national and California BLM policies.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12. The Noxious Weed Control Plan would include requirements and practices for the application of herbicides, including identification of floodplains and washes to limit application areas.
		Minimize herbicide, pesticide, and insecticide treatment in areas that have a high risk for groundwater contamination.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12.
		Clean and dispose of pesticide containers and equipment following professional standards. Avoid use of pesticides and cleaning containers and equipment in or near surface or subsurface water.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12.
		When near surface or subsurface water, restrict pesticide use to those products labeled safe for use in/near water and safe for aquatic species of animals and plants.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-12.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Noise	LUPA- BIO-12	For activities that may impact Focus or BLM Special Status Species, implement the following LUPA CMA for noise:		
		To the extent feasible, and determined necessary by BLM to protect Focus and BLM sensitive wildlife species, locate stationary noise sources that exceed background ambient noise levels away from known or likely locations of and BLM sensitive wildlife species and their suitable habitat.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-NO-07.
		Implement engineering controls on stationary equipment, buildings, and work areas including sound-insulation and noise enclosures to reduce the average noise level, if the activity will contribute to noise levels above existing background ambient levels.	Appendix 2A	Compliance with this CMA is achieved through application of APM-NO-01.
		Use noise controls on standard construction equipment including mufflers to reduce noise	Appendix 2A	Compliance with this CMA is achieved through application of APM-NO-01.
General Siting and Design	LUPA- BIO-13	Implement the following CMA for project siting and design:	Appendix 2A Appendix 4	Compliance with this CMA is partially achieved through application of T&T-05.
		To the maximum extent practicable site and design projects to avoid impacts to vegetation types, unique plant assemblages, climate refugia as well as occupied habitat and suitable habitat for Focus and BLM Special Status Species (see "avoid to the maximum extent practicable" in Glossary of Terms).	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM/BMP-BIO-11, APM-BIO-13, BMP-BIO-31, and BMP-BIO-52.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	• The siting of projects along the edges (i.e. general linkage border) of the biological linkages identified in Appendix D (Figures D-1 and D-2) will be configured (1) to maximize the retention of microphyll woodlands and their constituent vegetation type and inclusion of other physical and biological features conducive to Focus and BLM Special Status Species' dispersal, and (2) informed by existing available information on modeled focus and BLM Special Status Species habitat and element occurrence data, mapped delineations of vegetation types, and based on available empirical data, including radio telemetry, wildlife tracking sign, and road-kill information. Additionally, projects will be sited and designed to maintain the function of F Special Status Species connectivity and their associated habitats in the following linkage and connectivity areas:	N/A	Though identified linkages are not within the Project area, implementation of BMP-BIO-52 minimizes impacts to microphyll woodlands wherever it occurs on BLM land in California.
		o Within a 5-mile-wide linkage across Interstate 10 centered on Wiley's Well Road to connect the Mule and McCoy mountains (the majority of this linkage is within the Chuckwalla ACEC and Mule-McCoy Linkage ACEC).	N/A	Though the identified linkage, centered on Wiley's Well Road, is 4.5 miles from the Project and outside the linkage corridor (2.5 miles to each side of Wiley's Well Road), implementation of BMP-BIO-52 minimizes impacts to microphyll woodlands wherever it occurs on BLM land in California.
		Delineate the boundaries of areas to be disturbed using temporary construction fencing and flagging prior to construction and confine disturbances, project vehicles, and equipment to the delineated project areas to protect vegetation types and focus and BLM Special Status Species.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-04, APM-BIO-22, and APM-BIO-23.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	• Long-term nighttime lighting on project features will be limited to the minimum necessary for project security, safety, and compliance with Federal Aviation Administration requirements and will avoid the use of constant-burn lighting.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-33.
		 All long-term nighttime lighting will be directed away from riparian and wetland vegetation, occupied habitat, and suitable habitat areas for Focus and BLM Special Status Species. Long- term nighttime lighting will be directed and shielded downward to avoid interference with the navigation of night-migrating birds and to minimize the attraction of insects as well as insectivorous birds and bats to project infrastructure. 	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-33.
		• To the maximum extent practicable (see Glossary of Terms), restrict construction activity to existing roads, routes, and utility corridors to minimize the number and length/size of new roads, routes, disturbance, laydown, and borrow areas.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-& BMP-BIO-03, APM-BIO-17, BMP-BIO-31, BMP-BIO-52, BMP-BIO-53, BMP-BIO-55, and BMP-T&T-04.
		• To the maximum extent practicable (see Glossary of Terms), confine vehicular traffic to designated open routes of travel to and from the project site, and prohibit, within project boundaries, cross- country vehicle and equipment use outside of approved designated work areas to prevent unnecessary ground and vegetation disturbance.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-17, BMP-BIO-31, BMP-BIO-52, BMP-BIO-53, BMP-BIO-55, BMP-T&T-07, and BMP-T&T-08.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	To the maximum extent practicable (see Glossary of Terms), construction of new roads and/or routes will be avoided within Focus and BLM Special Status Species suitable habitat within identified linkages for those Focus and BLM Special Status Species, unless the new road and/or route is beneficial to minimize net impacts to natural or ecological resources of concern. These areas will have a goal of "no net gain" of project roads and/or routes.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-& BMP-BIO-03, APM-BMP-BIO-31, BMP-BIO-50, BMP-BIO-52, BMP-BIO-53, and BMP-BIO-55.
		Use nontoxic road sealants and soil stabilizing agents.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-WQ-04 and APM/BMP-AQ-01.
Biology: General Standard	LUPA- BIO-14	Implement the following general standard practices to protect Focus and BLM Special Status Species:	Section 4.5.4 Appendix 2A	
Practices		Feeding of wildlife, leaving of food or trash as an attractive nuisance to wildlife, collection of native plants, or harassing of wildlife on a site is prohibited.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-06, BMP-BIO-36, BMP-BIO-37, and BMP-WQ-04.
		Any wildlife encountered during the course of an activity, including construction, operation, and decommissioning will be allowed to leave the area unharmed.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-35 and BMP-BIO-36.
		Domestic pets are prohibited on sites. This prohibition does not apply to the use of domestic animals (e.g., dogs) that may be used to aid in official and approved monitoring procedures/protocols, or service animals (dogs) under Title II and Title III of the American with Disabilities Act.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-05.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	 All construction materials will be visually checked for the presence of wildlife prior to their movement or use. Any wildlife encountered during the course of these inspections will be allowed to leave the construction area unharmed. 	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-35.
		• All steep-walled trenches or excavations used during the project will be covered, except when being actively used, to prevent entrapment of wildlife. If trenches cannot be covered, they will be constructed with escape ramps, following up-to-date design standards to facilitate and allow wildlife to exit, or wildlife exclusion fencing will be installed around the trench(s) or excavation(s). Open trenches or other excavations will be inspected by a designated biologist immediately before backfilling, excavation, or other earthwork.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-09.
		 Minimize natural vegetation removal through implementation of crush and drive or cut or mow vegetation rather than removing entirely. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-14 and BMP-VEG-02.
	LUPA- BIO-15	Use state-of-the-art, as approved by BLM, construction and installation techniques, appropriate for the specific activity/project and site, that minimize new site disturbance, soil erosion and deposition, soil compaction, disturbance to topography, and removal of vegetation.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-38 and BMP-VEG-01.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Activity- Specific Bird and Bat CMAs	LUPA- BIO-16	For activities that may impact Focus and BLM sensitive birds, protected by the ESA and/or Migratory Bird Treaty Act of 1918, and bat species, implement appropriate measures as per the most up-to-date BLM state and national policy and guidance, and data on birds and bats, including but not limited to activity specific plans and actions. The goal of the activity-specific bird and bat actions is to avoid and minimize direct mortality of birds and bats from the construction, operation, maintenance, and decommissioning of the specific activities.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM/BMP-BIO-19, APM/BMP-BIO-21, BMP-BIO-29, BMP-BIO-30, and BMP-BIO-45.
		Activity-specific measures to avoid and minimize impacts may include, but are not limited to:		
		• Siting and designing activities will avoid high bird and bat movement areas that separate birds and bats from their common nesting and roosting sites, feeding areas, or lakes and rivers.	Appendix 2A	Compliance with this CMA is achieved through application of APM/BMP-BIO-19, APM/BMP-BIO-21, BMP-BIO-29, and BMP-BIO-40.
		• For activities that impact bird and bat Focus and BLM Special Status Species, during project siting and design, conducting monitoring of bird and bat presence as well as bird and bat use of the project site using the most current survey methods and best procedures available at the time.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-29.
		Reusing or co-locating new transmission facilities and other ancillary facilities with existing facilities and disturbed areas to reduce habitat destruction and avoid additional collision risks.	Chapter 2	The Proposed Action follows the existing DPV1 transmission line. Action alternative segments follow other linear utilities with associated access (with exception of a short connector road at the Colorado River Substation), and/or are located within BLM utility corridors.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	 Reducing bird and bat collision hazards by utilizing techniques such as unguyed monopole towers or tubular towers. Where the use of guywires is unavoidable, demarcate guywires using the best available methods to minimize avian species strikes. 	Chapter 2	Guyed structures are not proposed for the California portion of the Project.
		When fencing is necessary, use bird and bat compatible design standards.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-39.
		• Using lighting that does not attract birds and bats or their prey to project sites including using non-steady burning lights (red, dual red and white strobe, strobe- like flashing lights) to meet Federal Aviation Administration requirements, using motion or heat sensors and switches to reduce the time when lights are illuminated, using appropriate shielding to reduce horizontal or skyward illumination, and avoiding the use of high-intensity lights (e.g., sodium vapor, quartz, and halogen).	Section 4.5.4 Appendix 2A	Compliance with the CMA is achieved through application of BMP-BIO-29 and BMP-BIO-33.
		 Implementing a robust monitoring program to regularly check for wildlife carcasses, document the cause of mortality, and promptly remove the carcasses. 	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-21 and BMP-BIO-29.
		Incorporating a bird and bat use and mortality monitoring program during operations using current protocols and best procedures available at time of monitoring	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-21 and BMP-BIO-29.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Activity- Specific Bird and Bat CMAs	LUPA- BIO-17	For activities that may result in mortality to Focus and BLM Special—Status bird and bat species, a Bird and Bat Conservation Strategy (BBCS) will be prepared with the goal of assessing operational impacts to bird and bat species and incorporating methods to reduce documented mortality. The BBCS actions for impacts to birds and bats during these activities will be determined by the activity-specific bird and bat operational actions. The strategy shall be approved by BLM in coordination with USFWS, and CDFW as appropriate, and may include, but is not limited to:	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of AMP/BMP-BIO-19, BMP-BIO-21, and BMP-BIO-29.
		 Incorporating a bird and bat use and mortality monitoring program during operations using current protocols and best procedures available at time of monitoring. 	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-21 and BMP-BIO-29.
		 Activity-specific operational avoidance and minimization actions that reduce the level of mortality on the populations of bird and bat species, such as: 	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-21 and BMP-BIO-29.
		 Evaluation and installation of the best available bird and bat detection and deterrent technologies available at the time of construction. 	N/A	N/A
		The following provides the DRECP vegetation type and Focus and BLM Special Status Species biological CMAs to be implemented throughout the LUPA Decision Area.		
		Riparian and Wetland Vegetation Types and Associated Species (RIPWET)		
		Riparian Vegetation Types		

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	Con't	Sonoran-Coloradan Semi-Desert Wash Woodland/Scrub	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-46, BMP-BIO-47, BMP-BIO-50, BMP-BIO-51, and BMP-BIO-52.
		Riparian and Wetland Bird Focus Species		
		Southwestern Willow Flycatcher	Section 3.5.3 Appendix 2A	Though no suitable nesting habitat is present in the Project area, ground disturbance during the nesting season requires surveys for, and protection of all active bird nests, including the southwestern willow flycatcher. If nests are found protective buffers are applied. APM-BIO-20 and BMP-BIO-29 apply.
		Western Yellow-billed Cuckoo	Section 3.5.3 Appendix 2A	Though no suitable nesting habitat is present in the Project area, ground disturbance during the nesting season requires surveys for, and protection of all active bird nests, including the western yellow-billed cuckoo. If nests are found protective buffers are applied. APM-BIO-20 and BMP-BIO-29 apply.
		Yuma Clapper Rail	Section 3.5.3 Appendix 2A	Though no suitable nesting habitat is present in the Project area, ground disturbance during the nesting season requires surveys for, and protection of all active bird nests, including the Yuma clapper rail. If nests are found protective buffers are applied. APM-BIO-20 and BMP-BIO-29 apply.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Other Riparian & Wetland Focus Species: Tehachapi Slender Salamander	LUPA- BIO- RIPWE T-1	The riparian and wetland DRECP vegetation types and other features listed in Table 17 will be avoided to the maximum extent practicable, except for allowable minor incursions (see Glossary of Terms for "avoidance to the maximum extent practicable" and "minor incursion") with the specified setbacks.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of AMP/BMP-BIO-11, AMP/BMP-BIO-19, BMP-BIO-50, BMP-BIO-51, and BMP-BIO-52
		For minor incursion (see "minor incursion" in the Glossary of Terms) to the DRECP riparian vegetation types, wetland vegetation types, or encroachments on the setbacks listed in Table 17, the hydrologic function of the avoided riparian or wetland communities will be maintained.	Appendix 2A	Compliance with this CMA is achieved through application of AMP/BMP-BIO-19 and BMP-BIO-47.
		 Minor incursions in the riparian and wetland vegetation types or other features including the setbacks listed in Table 17 will occur outside of the avian nesting season, February 1 through August 31 or otherwise determined by BLM, USFWS and CDFW if the minor incursion(s) is likely to result in impacts to nesting birds. 	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-20 and BMP-BIO-29.
BLM Special Status Riparian Bird Species	LUPA- BIO- RIPWE T-3	For activities that occur within 0.25 mile of a riparian or wetland DRECP vegetation type and may impact BLM Special Status riparian and wetland bird species, conduct a preconstruction/activity nesting bird survey for BLM Special Status riparian and wetland birds according to agency-approved protocols.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-02, APM-BIO-20, and APM-BIO-25.
		Based on the results of the nesting bird survey above, setback activities that are likely to impact BLM Special Status riparian and wetland bird species, including but not limited to preconstruction, construction and decommissioning, 0.25 mile from active nests Special Status during the breeding season (February 1 through August 31 or otherwise determined by BLM, USFWS and CDFW). For activities in areas covered by this provision that occur during the breeding season and that last longer than one	Section 4.5.4 Section 4.5.7 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-02, APM-BIO-20, and APM-BIO-25.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
		week, nesting bird surveys may need to be repeated, as determined by BLM, in coordination with USFWS and CDFW, as appropriate. No pre-activity nesting bird surveys are necessary for activities occurring outside of the breeding season.		
Dune DRECP Vegetation Types, Aeolian Processes and Associated Species (DUNE): Aeolian Processes	LUPA- BIO- DUNE- 1	Because DRECP sand dune vegetation types and Aeolian sand transport corridors are, by definition, shifting resources, activities that potentially occur within or bordering the sand dune DRECP vegetation types and/or Aeolian sand transport corridors must conduct studies to verify the location [refer to Appendix D, Figure D-7] and extent of the sand resource(s) for the activity-specific environmental analysis to determine:	Section 3.3.3 Section 3.5.3 Section 4.3.4 Section 4.5.4 Appendix 2A	Compliance with this CMA is partially achieved through data contained in the Biological Resources Technical Reports, which is incorporated into Chapter 3 and Appendix 3 of this EIS, and analysis presented in Chapter 4 and Appendix 4. BMP-BIO-53 and BMP-BIO-54 apply.
		Whether the proposed activity(s) occur within a sand dune or an Aeolian sand transport corridor	Section 3.3.3 Section 3.5.3 Section 4.3.4 Section 4.5.4 Appendix 2A	Portions of Segments ca-07, ca-09, and x-19 would cross areas of active windblown sand. BMP-BIO-53 and BMP-BIO-54 apply.
		If the activity(s) is subject to dune/Aeolian sand transport corridor CMAs	Section 3.3.3 Section 3.5.3 Section 4.3.4 Section 4.5.4 Appendix 2A	Because portions of Segments ca-07, ca-09, and x-19 would cross areas of active windblown sand, those segments would be subject to dune/Aeolian sand transport corridor CMAs. BMP-BIO-54 applies.
		If the activity(s) needs to be reconfigured to satisfy applicable avoidance requirements	Section 3.3.3 Section 3.5.3 Section 4.3.4 Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-54.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	LUPA- BIO- DUNE- 2	Activities that potentially affect the amount of sand entering or transported within Aeolian sand transport corridors will be designed and operated to:		
		Maintain the quality and function of Aeolian transport corridors and sand deposition zones, unless related to maintenance of existing [at the time of the DRECP LUPA ROD] facilities/operations/activities	Section 4.3.4 Appendix 2A	Portions of Segments ca-07, ca-09, and x-19 would cross areas of active windblown sand. Compliance with this CMA is achieved through application of BMP-BIO-54.
		Avoid a reduction in sand-bearing sediments within the Aeolian system	Section 4.3.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-54.
		Minimize mortality to DUNE associated Focus and BLM Special Status Species	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-31, BMP-BIO-49, and BMP-BIO-53.
	LUPA- BIO- DUNE- 3	Any facilities or activities that alter site hydrology (e.g., sediment barrier) will be designed to maintain continued sediment transport and deposition in the Aeolian corridor in a way that maintains the Aeolian sorting and transport to downwind deposition zones. Site designs for maintaining this transport function must be approved by BLM in coordination with USFWS and CDFW as appropriate.	Appendix 2A	Compliance with this CMA is achieved through application of BMPs WQ-06 and WQ-07.
Mohave Fringe-Toed Lizard	LUPA- BIO- DUNE- 4	Dune formations and other sand accumulations (i.e., sand ramps, sand sheets) with suitable habitat characteristics for the Mojave fringe-toed lizard (i.e., unconsolidated blow-sand) will be mapped according to mapping standards established by the BLM National Operations Center.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-25 and BMP-BIO-49.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Con't		For minor incursions (see "minor incursion" in the Glossary of Terms) into sand dunes and sand transport areas the activity will be sited in the mapped zone with the least impacts to sand dunes and sand transport and Mojave fringe-toed lizards.	Section 4.5.4 Appendix 2A	All access and structures in sand dunes and transport areas would be microsited in consultation with the BLM. Compliance with this CMA is achieved through application of APM-BIO-25, BMP-BIO-49, BMP-BIO-53, BMP-BIO-54, and BMP-BIO-55.
	LUPA- BIO- DUNE- 5	If suitable habitat characteristics are identified during the habitat assessment, clearance surveys (see Glossary of Terms) for Mojave fringe-toed lizard will be performed in suitable habitat areas.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-02, APM-BIO-25, and BMP-BIO-49.
		The following CMAs will be implemented for bat Focus and BLM Special Status Species, including but not limited to those listed below:	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-29, BMP-BIO-33, BMP-BIO-39, and BMP-BIO-40.
		California Leaf-nosed Bat		
		Pallid Bat		
		Townsend's Big-eared Bat		
Bat Species (BAT)	LUPA- BIO- BAT-1	Activities, except wind projects, will not be sited within 500 feet of any occupied maternity roost or presumed occupied maternity roost as described below. Refer to CMA DFA-VPL-BIO-BAT-1 for distances within DFAs and VPLs.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-40; However, no bat roosts are expected in the portion of the Project area within the CDCA.
Plant Species (PLANT): Plant Focus and BLM Special Status Species CMAs	LUPA- BIO- PLANT -1	Conduct properly timed protocol surveys in accordance with the BLM's most current (at time of activity) survey protocols for plant Focus and BLM Special Status Species.	Section 3.5.3 Section 4.5.4 Appendix 2A	The rare plant surveys previously conducted, in conjunction with planned pre-construction surveys will meet the BLM's survey requirements. APM-BIO-24 applies.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	LUPA- BIO- PLANT -2	Implement an avoidance setback of 0.25 mile for all Focus and BLM Special Status Species occurrences. Setbacks will be placed strategically adjacent to occurrences to protect ecological processes necessary to support the plant Species (see Appendix Q, Baseline Biology Report, in the Proposed LUPA and Final EIS [2015], or the most recent data and modeling).	Section 2.2.2 Section 4.5.4 Section 4.5.7 Appendix 2A	The CDCA Plan would be further amended to eliminate this setback for the Project. Compliance with this CMA is achieved through application of BMP-BIO-31.
	LUPA- BIO- PLANT -3	Impacts to suitable habitat for Focus and BLM Special Status plant species should be avoided to the extent feasible and are limited [capped] to a maximum of 1% of their suitable habitat throughout the entire LUPA Decision Area. The baseline condition for measuring suitable habitat is the DRECP modeled suitable habitat for these species utilized in the EIS analysis (2014 and 2015), or the most recent suitable habitat modeling.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through data contained in the Biological Resources Technical Reports, which is incorporated into Chapter 3 and Appendix 3 of this EIS, and analysis presented in Chapter 4 and Appendix 4. BMP-BIO-31 applies.
Special Vegetation Features (SVF)	LUPA- BIO- SVF-1	For activity-specific NEPA analysis, a map delineating potential sites and habitat assessment of the following special vegetation features is required: Yucca clones, creosote rings, Saguaro cacti, Joshua tree woodland, microphyll woodland, Crucifixion thorn stands. BLM guidelines for mapping/surveying cacti, yuccas, and succulents shall be followed.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM/BMP-BIO-11, BMP-BIO-16, APM-BIO-24, BMP-BIO-41, BMP-BIO-52, and BMP-VEG-01.
	LUPA- BIO- SVF-6	Microphyll woodland: impacts to microphyll woodland (see Glossary of Terms) will be avoided, except for minor incursions (see Glossary of Terms).	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-50, BMP-BIO-51, and BMP-BIO-52.
General Vegetation Management (VEG)	LUPA- BIO- VEG-1	Management of cactus, yucca, and other succulents will adhere to current up-to-date BLM policy.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-41.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	LUPA- BIO- VEG-2	Promote appropriate levels of dead and downed wood on the ground, outside of campground areas, to provide wildlife habitat, seed beds for vegetation establishment, and reduce soil erosion, as determined appropriate on an activity-specific basis.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-42.
	LUPA- BIO- VEG-3	Allow for the collection of plant material consistent with the maintenance of natural ecosystem processes.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-43.
	LUPA- BIO- VEG-5	All activities will follow applicable BLM state and national regulations and policies for salvage and transplant of cactus, yucca, other succulents, and BLM Sensitive plants.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-41.
	LUPA- BIO- VEG-6	BLM may consider disposal of succulents through public sale, as per current up-to-date state and national policy.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-41.
Individual Focus Species (IFS): Desert Tortoise	LUPA- BIO- IFS-3	All culverts for access roads or other barriers will be designed to allow unrestricted access by desert tortoises and will be large enough that desert tortoises are unlikely to use them as shelter sites (e.g., 36 inches in diameter or larger). Desert tortoise exclusion fencing may be utilized to direct tortoise use of culverts and other passages.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-44.
	LUPA- BIO- IFS-5	Following the clearance surveys (see Glossary of Terms) within sites that are fenced with long-term desert tortoise exclusion fencing a designated biologist (see Glossary of Terms) will monitor initial clearing and grading activities to ensure that desert tortoises missed during the initial clearance survey are moved from harm's way.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM/BMP-BIO-23 and BMP-BIO-44.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
		• A designated biologist will inspect construction pipes, culverts, or similar structures: (a) with a diameter greater than 3 inches, (b) stored for one or more nights, (c) less than 8 inches aboveground and (d) within desert tortoise habitat (such as, outside the long-term fenced area), before the materials are moved, buried, or capped.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-23 and BMP-BIO-44.
		 As an alternative, such materials shall be capped before storing outside the fenced area or placing on pipe racks. Pipes stored within the long-term fenced area after completing desert tortoise clearance surveys will not require inspection. 	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-23 and BMP-BIO-44.
	LUPA- BIO- IFS-6	When working in areas where protocol or clearance surveys are required (see Appendix D), biological monitoring will occur with any geotechnical boring or geotechnical boring vehicle movement to ensure no desert tortoises are killed or burrows are crushed.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-02, APM-BIO-23, APM-BIO-25, and BMP-BIO-44.
	LUPA- BIO- IFS-7	A designated biologist (see Glossary of Terms) will accompany any geotechnical testing equipment to ensure no tortoises are killed and no burrows are crushed.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-02, APM-BIO-23, and BMP-BIO-44.
	LUPA- BIO- IFS-8	Inspect the ground under the vehicle for the presence of desert tortoise any time a vehicle or construction equipment is parked in desert tortoise habitat outside of areas fenced with desert tortoise exclusion fencing. If a desert tortoise is seen, it may move on its own. If it does not move within 15 minutes, a designated biologist may remove and relocate the animal to a safe location.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-23 and BMP-BIO-44.
	LUPA- BIO- IFS-9	Vehicular traffic will not exceed 15 miles per hour within the areas not cleared by protocol level surveys where desert tortoise may be impacted.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-44.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Bendire's Thrasher	LUPA- BIO- IFS-11	If Bendire's thrasher is present, conduct appropriate activity-specific biological monitoring (see Glossary of Terms) to ensure that Bendire's thrasher individuals are not directly affected by operations (i.e., mortality or injury, direct impacts on nest, eggs, or fledglings).	Section 4.5.4	Though Bendire's thrasher is not expected to be present in the Project area, ground disturbance during the nesting season requires surveys for, and protection of all active bird nests, including Bendire's thrasher. If nests are found protective buffers are applied. APM-BIO-20 and BMP-BIO-29 apply.
Burrowing Owl	LUPA- BIO- IFS-12	If burrowing owls are present, a designated biologist (see Glossary of Terms) will conduct appropriate activity-specific biological monitoring (see Glossary of Terms) to ensure avoidance of occupied burrows and establishment of the 656 feet (200 meter) setback to sufficiently minimize disturbance during the nesting period on all activity sites, when practical.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APMs BIO-02, AMPBIO-25, BMP-BIO-29, and BMP-BIO-30.
	LUPA- BIO- IFS-13	If burrows cannot be avoided on-site, passive burrow exclusion by a designated biologist (see Glossary of Terms) through the use of one-way doors will occur according to the specifications in Appendix D or the most up-to-date agency BLM or CDFW specifications. Before exclusion, there must be verification that burrows are empty as specified in Appendix D or the most up-to-date BLM or CDFW protocols. Confirmation that the burrow is not currently supporting nesting or fledgling activities is required prior to any burrow exclusions or excavations.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-30.
	LUPA- BIO- IFS-14	Activity-specific active translocation of burrowing owls may be considered, in coordination with CDFW.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-30.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Golden Eagle	LUPA- BIO- IFS-24	Provide protection from loss and harassment of active golden eagle nests through the following actions:		
		Activities that may impact nesting golden eagles, will not be sited or constructed within 1-mile of any active or alternative golden eagle nest within an active golden eagle territory, as determined by BLM in coordination with USFWS as appropriate.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-45.
	LUPA- BIO- IFS-25	Cumulative loss of golden eagle foraging habitat within a 1- to 4-mile radius around active or alternative golden eagle nests (as identified or defined in the most recent USFWS guidance and/or policy) will be limited to less than 20%. See CONS-BIO-IFS-5 for the requirement in Conservation Lands.	Section 3.5.3 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-45.
	LUPA- BIO- IFS-26	For activities that impact golden eagles, applicants will conduct a risk assessment per the applicable USFWS guidance (e.g. the Eagle Conservation Plan Guidance) using best available information as well as the data collected in the pre-project golden eagle surveys.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-45.
	LUPA- BIO- IFS-27	If a permit for golden eagle take is determined to be necessary, an application will be submitted to the USFWS in order to pursue a take permit.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-45.
	LUPA- BIO- IFS-28	In order to evaluate the potential risk to golden eagles, the following activities are required to conduct 2 years of pre-project golden eagle surveys in accordance with USFWS Eagle Conservation Plan Guidance.	Section 3.5.3 N/A	No reasonably foreseeable expectation for take of golden eagles

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Compensation	LUPA- BIO- COMP- 1	Impacts to biological resources, identified and analyzed in the activity specific environmental document, from activities in the LUPA Decision Area will be compensated using the standard biological resources compensation ratio, except for the biological resources and specific geographic locations listed as compensation ratio exceptions, specifics in CMAs LUPA-BIO-COMP-2 through -4, and previously listed CMAs. Compensation acreage requirements may be fulfilled through non-acquisition (i.e., restoration and enhancement), land acquisition (i.e., preserve), or a combination of these options, depending on the activity specifics and BLM approval/authorization.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-46. All compensation requirements would be captured in a Compensation Plan (mitigation measure BIO-1).
		Refer to CMA LUPA-COMP-1 and 2 for the timing requirements for initiation or completion of compensation.	N/A	Acknowledged
	LUPA- BIO- COMP- 2	Birds and Bats – The compensation for the mortality impacts to bird and bat Focus and BLM Special Status Species from activities will be determined based on monitoring of bird and bat mortality and a fee re-assessed every 5 years to fund compensatory mitigation. The initial compensation fee for bird and bat mortality impacts will be based on pre-project monitoring of bird use and estimated bird and bat species mortality from the activity. The approach to calculating the operational bird and bat compensation is based on the total replacement cost for a given resource, a Resource Equivalency Analysis. This involves measuring the relative loss to a population (debt) resulting from an activity and the productivity gain (credit) to a population from the implementation of compensatory mitigation actions. The measurement of these debts and gains (using the same "bird years" metric as described in Appendix D) is used to estimate the necessary compensation fee.	Section 4.5.4 Appendix 2A	MM BIO-1 requires the preparation of a Compensation Plan, which would aggregate biological compensatory mitigation requirements. Through APM/BMP-BIO-21 the required monitoring would provide data on bird mortality from which compensation fees would be determined.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
		Each activity, as determined appropriate by BLM in coordination with USFWS, and CDFW as applicable, will include a monitoring strategy to provide activity-specific information on mortality effects on birds and bats in order to determine the amount and type of compensation required to offset the effects of the activity, as described above and in detail in Appendix D. Compensation will be satisfied by restoring, protecting, or otherwise improving habitat such that the carrying capacity or productivity is increased to offset the impacts resulting from the activity. Compensation may also be satisfied by non-restoration actions that reduce mortality risks to birds and bats (e.g., increased predator control and protection of roosting sites from human disturbance). Compensation will be consistent with the most up to date DOI mitigation policy.	Section 4.5.4 Appendix 2A	All biological compensatory mitigation requirements would be captured in a Compensation Plan (mitigation measure BIO-1).

2C.1.2 Air Resources

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY					
Air Resources	LUPA- AIR-1	All activities must meet the following requirements:							
		Applicable National Ambient Air Quality Standards (Section 109)	Appendix 2A	Compliance with this CMA is achieved through application of APM-AQ-01, BMP-AQ-05.					
		• State Implementation Plans (Section 110)	Appendix 2A	Compliance with this CMA is achieved through application of APM-AQ-01, BMP-AQ-05.					
		• Prevention of Significant Deterioration, including visibility impacts to mandatory Federal Class I Areas (Section 160 et seq.)	Appendix 2A	Compliance with this CMA is achieved through application of APM-AQ-01, BMP-AQ-05.					
							Conformity Analyses and Determinations (Section 176[c])	Appendix 2A	Compliance with this CMA is achieved through application of APM-AQ-01, BMP-AQ-05.
		Apply best management practices on a case by case basis	Appendix 2A	Compliance with this CMA is achieved through application of APM-AQ-01, BMP-AQ-05.					
		Applicable local Air Quality Management Jurisdictions (e.g., 403 SCAQMD)	Appendix 2A	Compliance with this CMA is achieved through application of APM-AQ-01, BMP-AQ-05.					

CATEGORY CMA	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
LUPA- AIR-2	Because project authorizations are a federal undertaking, air quality standards for fugitive dust may not exceed local standards and requirements.	Appendix 2A	Compliance with this CMA is achieved through application of APM-AQ-01, AQ-05.
LUPA-AIR-3	Where impacts to air quality may be significant under NEPA, requiring analysis through an Environmental Impact Statement, require documentation for activities to include a detailed discussion and analysis of Ambient Air Quality conditions (baseline or existing), National Ambient Air Quality Standards, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project (including cumulative and indirect impacts and greenhouse gas emissions). This content is necessary to disclose the potential impacts from temporary or cumulative degradation of air quality. The discussion will include a description and estimate of air emissions from potential construction and maintenance activities, and proposed mitigation measures to minimize net PM10 and PM2.5 emissions. The documentation will specify the emission sources by pollutant from mobile sources, stationary sources, and ground disturbance. A Construction Emissions Mitigation Plan will be developed.	Appendix 2A	Compliance with this CMA is achieved through application of APM-AQ-01, AQ-02, and MISC-01.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	LUPA- AIR-4	Because fugitive dust is the number one source of PM10 and PM2.5 emissions in the Mojave and Sonoran Deserts, fugitive dust impacts to air quality must be analyzed for all activities/projects requiring an Environmental Impact Statement and Environmental Assessment.	Section 4.2	Air Quality impacts are assessed in the EIS.
		• The NEPA air quality analysis may include modeling of the sources of PM10 and PM2.5 that occur prior to construction and/or ground disturbance from the activity/project, and show the timing, duration and transport of emissions off site. When utilized, the modeling will also identify how the generation and movement of PM10 and PM2.5 will change during and after construction and/or ground disturbance of the activity/project under all activity/project specific NEPA alternatives. The BLM air resource specialist and Authorizing Officer will determine if modeling is required as part of the NEPA analysis based on estimated types and amounts of emissions.	N/A	The NOC, in conjunction with the California BLM determined modeling is not required for this Project.
	LUPA- AIR-5	• A fugitive Dust Control Plan will be developed for all projects where the NEPA analysis shows an impact on air quality from fugitive dust.	Appendix 2A	Compliance with this CMA is achieved through application of APM-AQ-01.

2C.1.3 Cultural Resources and Tribal Interests

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Cultural Resources and Tribal Interests	LUPA- CUL-4	Design activities to minimize impacts on cultural resources including places of traditional cultural and religious importance to federally recognized Tribes.	Appendix 2A	Compliance with LUPA-CUL-4 would be satisfied with BMP-CULT-03, which states that the applicant would follow avoidance and stipulations outlined in the PA and appropriate Historic Property Treatment Plans (HPTPs), and APM-CULT-01 and APM-CULT-02, in which the applicant commits to following those stipulations.

2C.1.4 Land Use

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Lands and Realty	LUPA- LANDS -4	Nonfederal lands within the boundaries of BLM LUPA land use allocations are not affected by the LUPA.	N/A	Acknowledged
	LUPA- LANDS -5	The MUCs used to determine land tenure in the CDCA Plan will be replaced by areas listed in the CMAs below.	Section 4.8.5	Acknowledged
	LUPA- LANDS -8	The CDCA Plan requirement that new transmission lines of 161kV or above, pipelines with diameters greater than 12 inches, coaxial cables for interstate communications, and major aqueducts or canals for interbasin transfers of water will be located in designated utility corridors, or considered through the plan amendment process outside of designated utility corridors, remains unchanged. The only exception is that transmission facilities may be located outside of designated corridors within DFAs without a plan amendment. This CMA does not apply the Bishop and Bakersfield RMPs.	Section 4.8.5	The Project would comply with this CMA because it would be entirely within a DFA; additionally, some of the Project would also be within designated utility corridors.

2C.1.5 Minerals

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Minerals	LUPA- MIN-5	Areas Located Outside Identified Mineral Areas		
		Areas which could not be characterized due to insufficient data and mineral potential may fluctuate dependent on market economy, extraction technology, and other geologic information-requiring periodic updating. Authorizations are subject to the governing laws and regulations and LUPA requirements.	N/A	Compliance would be achieved at a later date, should the BLM change the characterization of lands within the Project ROW.

2C.1.6 Paleontological Resources

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Paleontology	LUPA- PALEO -1	If not previously available, prepare paleontological sensitivity maps consistent with the Potential Fossil Yield Classification for activities prior to NEPA analysis.	Appendix 1, Figure 3.4-1	The Project would comply - specific PFYC maps were created using existing PFYC maps of the area and associated geologic unit tables, in addition to known fossil localities.
	LUPA- PALEO -2	Incorporate all guidance provided by the Paleontological Resources Protection Act.	Appendix 2B	The Project will be in full compliance with the Paleontological Resources Preservation Act (P.L. 111-11, Title VI, Subtitle D). The BLM's management of paleontological resources is further directed through BLM IM 2016-124, IM 2009-011, and IM 2008-009.
	LUPA- PALEO -3	Ensure proper data recovery of significant paleontological resources where adverse impacts cannot be avoided or otherwise mitigated.	Appendix 2A	Compliance with this CMA is achieved through application of APM-PALEO-01.
	LUPA- PALEO -4	Paleontological surveys and construction monitors are required for ground disturbing activities that require an EIS.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-PALEO-02.

2C.1.7 Soil and Water Resources

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Soil and Water General	LUPA- SW-1	Stipulations or conditions of approval for any activity will be imposed that provide appropriate protective measures to protect the quantity and quality of all water resources (including ephemeral, intermittent, and perennial water bodies) and any associated riparian habitat (see biological CMAs for specific riparian habitat CMAs). The water resources to which this CMA applies will be identified through the activity-specific NEPA analysis.	Section 3.19	Compliance with this CMA is achieved through APMs and BMPs in Biological Resources, Soil Resources, and Water Resources in Appendix 2A. The water resources to which this CMA applies are identified in Section 3.2.10.
	LUPA- SW-2	Buffer zones, setbacks, and activity limitations specifically for soil and water (ground and surface) resources will be determined on an activity/site-specific basis through the environmental review process and will be consistent with the soil and water resource goals and objectives to protect these resources. Specific requirements, such as buffer zones and setbacks, may be based, in part, on the results of the Water Supply Assessment defined below. In general, placement of long-term facilities within buffers or protected zones for soil and water resources is discouraged but may be permitted if soil and water resource management objectives can be maintained.	Sections 4.3 and 4.19	Compliance with this CMA is achieved by the environmental review in Sections 4.3 and 4.2.10, and the reasoning in the ROD regarding the selected alternative meeting soil and water resource management objectives.
	LUPA- SW-3	Where a seeming conflict between CMAs within or between resources arises, the CMA(s) resulting in the most resource protection apply.	N/A	Acknowledged. No conflicts between CMAs noted.
	LUPA- SW-4	Nothing in the "Exceptions" below applies to or takes precedence over any of the CMAs for biological resources.		

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Groundwater Resources	LUPA- SW-5	Exceptions to any of the specific soil and water stipulations contained in this section, as well as those listed below under the subheadings "Soil Resources," "Surface Water," and "Groundwater Resources," may be granted by the authorized officer if the applicant submits a plan, or, for BLM-initiated actions, the BLM provides documentation, that demonstrates:		
		The impacts are minimal (e.g., no predicted aquifer drawdown beyond existing annual variability in basins where cumulative groundwater use is not above perennial yield and water tables are not currently trending downward) or can be adequately mitigated.	Section 2.2.7.5	Water would be acquired from private commercial sources.
Soil Resources	LUPA- SW-6	In addition to the applicable required governmental safeguards, third party activities will implement up-to-date standard industry construction practices to prevent toxic substances from leaching into the soil.	Appendix 2A	Compliance with this CMA is achieved through application of APM-HAZ-01.
	LUPA- SW-7	Prepare an emergency response plan, approved by the BLM contaminant remediation specialist, that ensures rapid response in the event of spills of toxic substances over soils.	Appendix 2A	Compliance with this CMA is achieved through application of APM-HAZ-01.
	LUPA- SW-8	As determined necessary on an activity specific basis, prepare a site plan specific to major soil types present (≥5% of footprint or laydown surfaces) in Wind Erodibility Groups 1 and 2 and in Hydrology Soil Class D as defined by the USDA Natural Resource Conservation Service to minimize water and air erosion from disturbed soils on activity sites.	Appendix 2A	Compliance with this CMA is achieved through application of APM-GEO-01.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	LUPA- SW-9	The extent of desert pavement within the proposed boundary of an activity shall be mapped if it is anticipated that the activity may create erosional or ecologic impacts. Mapping will use the best available data and standards, as determined by BLM. Disturbance of desert pavement within the boundary of an activity shall be limited to the extent possible. If disturbance from an activity is likely to exceed 10% of the desert pavement mapped within the activity boundary, the BLM will determine whether the erosional and ecologic impacts of exceeding the 10% cap by the proposed amount would be insignificant and/or whether the activity should be redesigned to minimize desert pavement disturbance.	Appendix 2A	Compliance with this CMA is achieved through application of BMPs SOIL-04 and SOIL-05.
	LUPA- SW-10	The extent of additional sensitive soil areas (cryptobiotic soil crusts, hydric soils, highly corrosive soils, expansive soils, and soils at severe risk of erosion) shall be mapped if it is anticipated that an activity will impact these resources. To the extent possible, avoid disturbance of desert biologically intact soil crusts, and soils highly susceptible to wind and water erosion.	Appendix 2A	Required mapping of sensitive soil areas is contained in the project record. In addition, Compliance with this CMA is achieved through application of BMP-SOIL-07.
	LUPA- SW-11	Where possible, side casting shall be avoided where road construction requires cut- and-fill procedures.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-SOIL-06.
Surface Water	LUPA- SW-12	Except in DFAs, exclude long-term structures in, playas (dry lake beds), and Wild and Scenic River corridors, except as allowed with minor incursions (see definition in the Glossary of Terms).	N/A	The Project would be within a DFA. Non-Federal surface waters outside the DFA would be spanned.
	LUPA- SW-13	BLM will manage all riparian areas to be maintained at, or brought to, proper functioning condition.	Appendix 2A	Compliance with this CMA is achieved through application of AMP/BMP-BIO-19 and BMP-BIO-47.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	LUPA- SW-14	All relevant requirements of Executive Orders 11988 (Floodplain Management) and 11990 (Protection of Wetlands) will be complied with.	Section 4.19	The analysis includes a floodplain assessment and statement of findings that analyzes the potential floodplain impacts associated with the Project. The action alternatives would not be likely to disturb or affect any wetlands (e.g., all should be able to be avoided/spanned), thus a wetlands statement of findings is not included.
	LUPA- SW-15	Surface water diversion for beneficial use will not occur absent a state water right.	N/A	No surface water diversions are planned for the Project
	LUPA- SW-16	The 100-year floodplain boundaries for any surface water feature in the vicinity of the project will be identified. If maps are not available from the Federal Emergency Management Agency (FEMA), these boundaries will be determined via hydrologic modeling and analysis as part of the environmental review process. Construction within, or alteration of, 100-year floodplains will be avoided where possible, and permitted only when all required permits from other agencies are obtained.	Section 4.19 Appendix 2A	Compliance with this CMA is also achieved through application of APM-BIO-19.
Groundwater	LUPA- SW-18	Water extracted or consumptively used for the construction, operation, maintenance, or remediation of the project shall be solely for the beneficial use of the project or its associated mitigation and remediation measures, as specified in approved plans and permits.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-WQ-05.
	LUPA- SW-20	After application of applicable avoidance and minimization measures, all remaining unavoidable residual impacts to surface waters from the proposed activity shall be mitigated to ensure no net loss of function and value, as determined by the BLM.	Section 4.19	Compliance is demonstrated by the fact that no residual impacts are identified.

CATEGORY	CMA#	СМА ТЕХТ	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	LUPA- SW-21	Consideration shall be given to design alternatives that maintain the existing hydrology of the site or redirect excess flows created by hardscapes and reduced permeability from surface waters to areas where they will dissipate by percolation into the landscape.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-WQ-06.
	LUPA- SW-22	All hydrologic alterations shall be avoided that could reduce water quality or quantity for all applicable beneficial uses associated with the hydrologic unit in the project area, or specific mitigation measures shall be implemented that will minimize unavoidable water quality or quantity impacts, as determined by BLM in coordination with USFWS, CDFW, and other agencies, as appropriate. These beneficial uses may include municipal, domestic, or agricultural water supply; groundwater recharge; surface water replenishment; recreation; water quality enhancement; flood peak attenuation or flood water storage; and wildlife habitat.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-WQ-06 and the Section 404 permitting process.

2C.1.8 Visual Resource Management

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Visual Resources Management	LUPA- VRM-1	Manage Visual Resources in accordance with the VRM classes shown on Figure 9.	Section 4.18	Conformance with VRM classes is demonstrated in the EIS analysis.
	LUPA- VRM-2	Ensure that activities within each of the VRM Class polygons meets the VRM objectives described above, as measured through a visual contrast rating process.	Section 4.18	Conformance with VRM classes is demonstrated in the EIS analysis.
	LUPA- VRM-3	Ensure that transmission facilities are designed and located to meet the VRM Class objectives for the area in which they are located. New transmission lines routed through designated corridors where they do not meet VRM Class Objectives will require RMP amendments to establish a conforming VRM Objective. All reasonable effort must be made to reduce visual contrast of these facilities in order to meet the VRM Class before pursing RMP amendments. This includes changes in routing, using lattice towers (vs. monopole), color treating facilities using an approved color from the BLM Environmental Color Chart CC-001 (dated June 2008, as updated on April 2014, or the most recent version) (vs. galvanized) on towers and support facilities, and employing other BMPs to reduce contrast. Such efforts will be retained even if an RMP amendment is determined to be needed. Visual Resource BMPs that reduce adverse visual contrast will be applied in VRM Class conforming situations. For a reference of BMPs for reducing visual impacts see the "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands", available at http://www.blm.gov/style/medialib/blm/wo/MINERALS_REALTYAND_RESOURCE_PROTECTION_/energy/renewable_references .Par.1568.File.dat/RenewableEnergyVisualImpacts_BMPs.pdf, or the most recent version of the document or BMPs for VRM, as determined by BLM.	Section 4.18	The Project would meet VRM objectives established for BLM-administered public lands within the Project Area in the PSFO.

2C.2 LUPA-WIDE TRANSMISSION CMAS

2C.2.1 Biological Resources

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTION	COMPLIANCE SUMMARY
Biological Resources	LUPA-TRANS- BIO-1	Where feasible and appropriate for resource protection, site transmission activities along roads or other previously disturbed areas to minimize new surface disturbance, reduce perching opportunities for the Common Raven, and minimize collision risks for birds and bats.	Section 4.5.7 Appendix 2A	Compliance with this CMA is achieved through application of APM-AES-06, APM/BMP-BIO-19, BMP-AES-06, BMP-BIO-21, and BMP-BIO-28.
I	LUPA-TRANS- BIO-2	Flight diverters will be installed on all transmission activities spanning or within 1,000 feet of stream and wash channels, canals, ponds, and any other natural or artificial body of water. The type of flight diverter selected will be subject to approval by BLM, in coordination with USFWS and CDFW as appropriate, and will be based on the best available scientific and commercial data regarding the prevention of bird collisions with transmission and guy wires.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-21 and BMP-BIO-48.
	LUPA-TRANS- BIO-3	When siting transmission activities, the alignment should avoid, to the maximum extent practicable, being located across canyons or on ridgelines. Site and design sufficient distance between transmission lines to prevent electrocution of condors.	Appendix 2A	Compliance with this CMA is achieved through application of APM/BMP-BIO-21, BMP-AES-07, and BMP-AES-08. However, there are no canyons or ridgelines in the portion of the Project area located within the CDCA Plan area.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTION	COMPLIANCE SUMMARY
Biological Resources	LUPA-TRANS- BIO-4	Siting of transmission activities will be prioritized within designated utility corridors, where possible, and designed to avoid, where possible, and otherwise minimize and offset impacts to sand transport processes in Aeolian corridors, rare vegetation alliances and Focus and BLM Special Status Species. Transmission substations will be sited to avoid Aeolian corridors, rare vegetation alliances, and sand-dependent Focus and BLM Special Status Species habitats.	Section 3.3.3 Section 3.5.3 Chapter 2 Section 4.3.4 Section 4.5.4 Appendix 2A	Portions of Segments ca-07, ca-09, and x-19 would cross areas of active windblown sand. Compliance with this CMA is achieved through application of APM-AES-05, BMP-BIO-53, and BMP-BIO-54.

2C.2.2 Cultural Resources and Tribal Interests

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTION	COMPLIANCE SUMMARY
Cultural Resources & Tribal Interests	LUPA-TRANS- CUL-1	For transmission (and renewable energy) activities, require the applicant to pay all appropriate costs associated with the following processes, through the appropriate BLM funding mechanism:	Appendix 2D	Compliance with LUPA-TRANS-CUL-1 would be satisfied by APM-CULT-01 and APM-CULT-02, in which the applicant commits to conducting a cultural resources inventory of the direct and indirect APE, preparing HPTPs, and conducting cultural resource monitoring during Project construction, operations, and maintenance (as appropriate) to meet stipulations outlined in the PA Appendix 2D.
		All appropriate costs associated with the BLM's analysis of the DRECP geodatabase and other sources for cultural resources sensitivity.		

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTION	COMPLIANCE SUMMARY
		All appropriate costs associated with preliminary sensitivity analysis.		
		 All appropriate costs associated with the Section 106 process including the identification and defining of cultural resources. These costs may also include logistical, travel, and other support costs incurred by tribes in the consultation process. All appropriate costs associated with updating the DRECP cultural resources geodatabase with project specific results. 	N/A	Enforcement by BLM.
	LUPA-TRANS- CUL-2	Consistent and in compliance with the NHPA Programmatic Agreement, signed February 5, 2016, or the most up to date signed version – for transmission (and renewable energy) activities, a compensatory mitigation fee will be required within the LUPA Decision Area to address cumulative and some indirect adverse effects to historic properties. The mitigation fee will be calculated in a manner that is commensurate to the size and regional impacts of the project. Refer to the NHPA Programmatic Agreement for details regarding the mitigation fee.	Appendix 2D	Compensatory mitigation determinations pending within the BLM. Compliance with LUPA-TRANS- CULT-2 would be satisfied by BMP- CULT-05, which outlines the fee structure of the compensatory mitigation fee. The compensatory mitigation fee structure is also outlined in the stipulations contained within the PA.
	LUPA-TRANS- CUL-3	For transmission (and renewable energy) activities, the management fee rate will be determined through the NHPA programmatic Section 106 consultation process that will be completed as part of the DRECP land use plan amendment.	Appendix 2D	Management fee determinations pending within the BLM. Compliance with LUPA-TRANS-CUL-3 would be satisfied by BMP-CULT- 05, which outlines the fee structure of the management fee as part of the compensatory mitigation fee. The management fee and compensatory mitigation fee structure is also outlined in the stipulations contained within the PA.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTION	COMPLIANCE SUMMARY
	LUPA-TRANS- CUL-4	For transmission (and renewable energy) activities, demonstrate that results of cultural resources sensitivity, based on the DRECP geodatabase, and other sources, are used as part of the initial planning pre-application process and to select of specific footprints for further consideration.		Sensitivity analysis responses pending BLM review. Compliance with LUPA-TRANS-CUL-4 would be satisfied with BMP-CUL-06. The BLM has prepared a sensitivity model (Kline 2017).
	LUPA-TRANS- CUL-5	For transmission (and renewable energy) activities, provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints.	Section 3.6	Class III inventory results pending BLM review. Compliance with LUPA-TRANS-CUL-5 would be satisfied by BMP-CULT-07, which requires cultural resources Class III survey of segments p-17 and p-18 to be conducted during the NEPA and CEQA analyses to meet the conditions of LUPA-TRANS-CUL-5 and DFA-VPL-CUL-5. The Class III survey of segments p-17 and p-18 has been conducted.
	LUPA-TRANS- CUL-6	For transmission (and renewable energy) activities, provide justification in the application why the project considerations merit moving forward if the specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM.		Sensitivity analysis responses pending BLM review. Compliance with LUPA-TRANS-CUL-6 would be satisfied by BMP-CULT-08, which requires such justification from the Project applicant.

2C.3 DFA AND VPL-SPECIFIC CMAS

2C.3.1 Biological Resources

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Biological Resources: North American Warm Desert Dune and Sand Flats	North American Warm Desert Dune and Sand DUNE-1	Activities in DFAs and VPLs, including transmission substations, will be sited to avoid dune vegetation (i.e., North American Warm Desert Dune and Sand Flats). Unavoidable impacts (see "unavoidable impacts to resources" in the Glossary of Terms) to dune vegetation will be limited to transmission projects, except transmission substations, and access roads that will be sited to minimize unavoidable impacts.	Section 3.3.3 Section 3.5.3 Section 4.3.4 Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-53.
		For unavoidable impacts (see "unavoidable impacts to resources" in the Glossary of Terms) to dune vegetation, the following will be required:		
		o Access roads will be unpaved.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIP-53 and BMP-T&T-06.
		o Access roads will be designed and constructed to be at grade with the ground surface to avoid inhibiting sand transportation.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-53 and BMP-T&T-06.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	DFA-VPL-BIO- DUNE-2	Within Aeolian corridors that transport sand to dune formations and vegetation types downwind inside and outside of the DFAs, all activities will be designed and operated to facilitate the flow of sand across activity sites, and avoid the trapping or diverting of sand from the Aeolian corridor. Buildings and structures within the site will take into account the direction of sand flow and, to the extent feasible, build and align structures to allow sand to flow through the site unimpeded. Fences will be designed to allow sand to flow through and not be trapped.	Section 4.3.4 Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of BMP-BIO-54. Buildings and fences are not proposed for the portion of the Project in California. Structures are proposed to be self-supported lattice, which would minimize obstruction to sand transport. Tangent lattice structures would allow winds to essentially blow through the structure, minimizing the impact on sand transport.
Individual Focus Species (IFS): Desert Tortoise	DFA-VPL-BIO-IFS-	To the maximum extent practicable (see Glossary of Terms), activities will be sited in previously disturbed areas, areas of low-quality habitat, and areas with low habitat intactness in desert tortoise linkages and the Ord-Rodman TCA, identified in Appendix D.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-MISC-04.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Fire Prevention/Protection	DFA-VPL-BIO- FIRE-1	Implement the following standard practice for fire prevention/protection:		
		Implement site-specific fire prevention/protection actions particular to the construction and operation of renewable energy and transmission project that include procedures for reducing fires while minimizing the necessary amount of vegetation clearing, fuel modification, and other construction-related activities. At a minimum these actions will include designating site fire coordinators, providing adequate fire suppression equipment (including in vehicles), and establishing emergency response information relevant to the construction site.	Section 4.5.4 Appendix 2A	Compliance with this CMA is achieved through application of AMP/BMP-BIO-11, BMP-PH&S-02, and BMP-HAZ-02
Biological Compensation	DFA-VPL-BIO- COMP-1	Impacts to biological resources from all activities in DFAs and VPLs will be compensated using the same ratios and strategies as LUPA-BIO-COMP-1 through 4, with the exception identified below in DFA-VPL-BIO-COMP-2.	N/A	See LUPA-BIO-COMP-1 and 2. All biological compensatory mitigation requirements would be captured in a Compensation Plan (mitigation measure BIO-1).

2C.3.2 Cultural Resources and Tribal Interests

The following CMAs are for renewable energy and transmission land use authorizations only, in DFAs and VPLs. All other activities in DFAs and VPs are subject to the NHPA Section 106 process.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	DFA-VPL-CUL-1	For renewable energy activities and transmission, require the applicant to pay all appropriate costs associated with the following processes, through the appropriate BLM funding mechanism:	Appendix 2D	Compliance with DFA-VPL-CUL-1 would be satisfied by APM-CULT-01 and APM-CULT-02, in which the applicant commits to conducting a cultural resources inventory of the direct and indirect APE, preparing HPTPs, and conducting cultural resource monitoring during Project construction, operations, and maintenance (as appropriate) to meet stipulations outlined in the PA.
		All appropriate costs associated with the BLM's analysis of the DRECP geodatabase and other sources for cultural resources sensitivity.		
		All appropriate costs associated with preliminary sensitivity analysis.	N/A	Enforcement by BLM.
		All appropriate costs associated with the Section 106 process including the identification and defining of cultural resources. These costs may also include logistical, travel, and other support costs incurred by tribes in the consultation process.		
		All appropriate costs associated with updating the DRECP cultural resources geodatabase with project specific results.		

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	DFA-VPL-CUL-2	Consistent and in compliance with the NHPA Programmatic Agreement, signed February 5, 2016, or the most up to date signed version -for renewable energy activities and transmission, a compensatory mitigation fee will be required within the LUPA Decision Area to address cumulative and some indirect adverse effects to historic properties. The mitigation fee will be calculated in a manner that is commensurate to the size and regional impacts of the project. Refer to the Programmatic Agreement for details regarding the mitigation fee.	Appendix 2D	Compensatory mitigation determinations and final draft PA language pending within the BLM. Compliance with LUPA-TRANS-CULT-2 and DFA-VPL-CUL-2 would be satisfied by BMP-CULT-05, which outlines the fee structure of the compensatory mitigation fee. The compensatory mitigation fee structure is also outlined in the stipulations contained within the PA.
	DFA-VPL-CUL-3	For renewable energy activities and transmission, the management fee rate will be determined through the NHPA programmatic Section 106 consultation process that will be completed as part of the DRECP land use plan amendment.	Appendix 2D	Management fee and mitigation fee determinations, and final draft PA language pending within the BLM. Compliance with DFA-VPL-CUL-3 would be satisfied by BMP-CULT- 05, which outlines the fee structure of the management fee as part of the compensatory mitigation fee. The management fee and compensatory mitigation fee structure is also outlined in the stipulations contained within the PA.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	DFA-VPL-CUL-4	For renewable energy activities and transmission, demonstrate that results of cultural resources sensitivity, based on the DRECP geodatabase, and other sources, are used as part of the initial planning pre-application process and to select of specific footprints for further consideration.		Sensitivity analysis responses pending BLM review. Compliance with DFA-VPL-CUL-4 would be satisfied with BMP-CUL-06. The BLM has prepared a sensitivity model (Kline 2017).
	DFA-VPL-CUL-5	For renewable energy activities and transmission, provide a statistically significant sample survey as part of the pre-application process, unless the BLM determines the DRECP geodatabase and other sources are adequate to assess cultural resources sensitivity of specific footprints.	Section 3.6.3	Sensitivity analysis responses and Class III draft survey report pending BLM review. Compliance with DFA-VPL-CUL-5 would be satisfied by BMP-CULT-07, which requires cultural resources Class III survey of segments p-17 and p-18 to be conducted during the NEPA and CEQA analyses to meet the conditions of DFA-VPL-CUL-5. The Class III survey of segments p-17 and p-18 has been conducted.
	DFA-VPL-CUL-6	For renewable energy activities and transmission, provide justification in the application why the project considerations merit moving forward if the specific footprint lies within an area identified or forecast as sensitive for cultural resources by the BLM.		Sensitivity analysis responses pending BLM review. Compliance with DFA-VPL-CUL-6 would be satisfied by BMP-CULT-08, which requires such justification from the Project applicant.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	DFA-VPL-CUL-7	For renewable energy activities and transmission, complete the NHPA Section 106 Process as specified in 36 CFR Part 800, or via an alternate procedure, allowed for under 36 CFR Part 800.14 prior to issuing a ROD or ROW grant on any utility-scale renewable energy or transmission project. For utility-scale solar energy developments, the BLM may follow the Solar Programmatic Agreement.	Section 3.6.1 Section 3.7.3.2 Appendix 2D	Section 5.5.1 summarizes the process of drafting the Programmatic Agreement. Section 5.3 presents the efforts of Native American consultation with Indian tribes. Appendix 2D is the draft Programmatic Agreement for the Project. The PA would be executed prior to issuing a ROD or ROW grant.

2C.3.3 Visual Resource Management

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Visual Resources Management	DFA-VPL-VRM-1	Encourage development in a planned fashion within DFAs (e.g., similar to the planned unit development concept used for urban design—i.e., in-fill vs. scattered development, use of common road networks, Generator Tie Lines etc., use of similar support facility designs materials and colors etc.) to avoid industrial sprawl.	Appendix 1, Figure 2.4-5 and Table 2.2-4	The entire portion of the Project Area on BLM-administered lands in California is within a DFA. Portions of the Proposed Action and many of the Action Alternative segments would either be within or immediately adjacent to designated utility corridors on BLM-administered lands in California.
	DFA-VPL-VRM-2	Development in DFAs and VPLs are required to incorporate visual design standards and include the best available, most recent BMPs, as determined by BLM (e.g. Solar, Wind, West Wide Energy Corridor, and Geothermal PEISs, the "Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands", and other programmatic BMP-documents).	Appendix 2A	See APMs and BMPs developed for visual resources, some of which came from the referenced document.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
DFA-VPL	DFA-VPL-VRM-3	Required Visual Resource BMPs. All development within the DFAs and VPLs will abide by the BMPs addressed in the most recent version of the document "Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands", or its replacement, including, but not limited to the following:	Appendix 2A	See APMs and BMPs developed for visual resources, some of which came from the referenced document. J. Dalton is seeking additional direction regarding dark night skies from Washington; additions will be made once direction is received.
		Transmission:		
		o Color-treat monopoles Shadow Gray per the BLM Environmental Color Chart CC001 unless a more effective color choice is selected by the local Field Office VRM specialist.	Appendix 2A	Compliance with this CMA is achieved through application of APM-& BMP-AES-04.
		o Lattice towers and conductors will have non- specular qualities.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-AES-04.
		o Lattice Towers will be located a minimum of 3/4 mile away from Key Observation Points such as roads, scenic overlooks, trails, campgrounds, navigable rivers and other areas people tend to congregate and located against a landscape backdrop when topography allows.	Appendix 1, Figure 3.18-52	The Project would comply with this CMA, as the KOPs for the portion of the Project located on Federal lands in California are a minimum of ¾ mile away from Project infrastructure, and self-supporting lattice structures are proposed.

2C.4 DFA-SPECIFIC CMAS

2C.4.1 Biological Resources

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Biological Resources	DFA-BIO-IFS-1	Conduct the following surveys as applicable in the DFAs as shown in Table 21.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-02, APM/BMP-BIO-23, APM-BIO-20, BMP-BIO-30, and BMP-BIO-45.
	DFA-BIO-IFS-2	Implement the following setbacks shown below in Table 22 as applicable in the DFAs.	Appendix 2A	Compliance with this CMA is achieved through application of APM-BIO-02, BMP-BIO-29, BMP-BIO-30, and BMP-BIO-45.

2C.4.2 Recreation

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Recreation	DFA-REC-1	Retain, to the extent possible, the identified recreation setting characteristics: physical components of remoteness, naturalness and facilities; social components of contact, group size and evidence of use; and operational components of access, visitor services and management controls (see recreation setting characteristics matrix).	Appendix 2A	Compliance with this CMA is achieved through application of BMP-REC-01.
	DFA-REC-2	Avoid large-scale ground disturbance within one-half mile of Level 3	Appendix 2A	Compliance with this CMA is achieved through application of BMP-REC-01.
		Recreation facility footprint including route access and staging areas. If avoidance isn't practicable, the facility must be relocated to the same or higher standard and maintain recreation objectives and setting characteristics.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-REC-01.
	DFA-REC-4	When considering large-scale development in DFAs, retain to the extent possible existing, approved recreation activities.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-REC-01.
	DFA-REC-5	For displacement of dispersed recreation opportunities, commensurate compensation in the form of enhanced recreation operations, recreation facilities or opportunities will be required. If recreation displacement results in resource damage due to increased use in other areas, mitigate that damage through whatever measures are most appropriate as determined by the Authorized Officer.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-REC-01.

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	DFA-REC-7	If designated vehicle routes are directly impacted by activities (includes modification of existing route to accommodate industrial equipment, restricted access or full closure of designated route, pull outs, and staging areas to the public, etc.), mitigation will include the development of alternative routes to allow for continued vehicular access with proper signage, with a similar recreation experience. In addition, mitigation will also include the construction of an "OHV touring route" which circumvents the activity area and allows for interpretive signing materials to be placed at strategic locations along the new touring route, if determined to be appropriate by BLM.	Appendix 2A	Compliance with this CMA is achieved through application of BMP-REC-01.

2C.4.3 Lands and Realty

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Lands and Realty	DFA-LANDS-7	Transmission facilities are an allowable use and will not require a plan amendment within DFAs.	Section 4.8.9	The Project would be within the established DFA and therefore no RMPA would be required; thus, the Project complies with this CMA.

2C.4.4 Visual Resource Management

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
Visual Resources Management	DFA-VRM-1	Manage all DFAs as VRM Class IV to allow for industrial scale development. Employ best management practices to reduce visual contrast of facilities.	Section 4.18	The Project would comply with VRM Class IV objectives.
	DFA-VRM-2	Regional mitigation for visual impacts is required in DFAs. Mitigation is to be based on the VRI class and the underlying visual values (scenic quality, sensitivity, and distance zone) for the activity area as it stands at the time the ROD is signed for the DRECP LUPA. Compensatory mitigation may take the form of reclamation of other BLM lands to maintain (neutral) or enhance (beneficial) visual values on VRI Class II and III lands. Other considerations may include acquisition of conservation easements to protect and sustain visual quality within the viewshed of BLM lands. The following mitigation ratios will be applied in DFAs:	Section 4.18	Analysis of impacts determined that the Project would not result in reduction of VRI Class II areas in California to lower VRI classes. Therefore, no compensatory mitigation would be required for the Project.
		VRI Class II 1:1 ratio		

2C.4.5 Compensation

CATEGORY	CMA#	CMA TEXT	RELEVANT EIS SECTIONS	COMPLIANCE SUMMARY
	LUPA-COMP-1	For third party actions, compensation activities must be initiated or completed within 12 months from the time the resource impact occurs (e.g. ground disturbance, habitat removal, route obliteration, etc. for construction activities; wildlife mortality, visual impacts, etc. due to operations).	N/A	Details of reclamation/restoration demonstrating compliance with the CMA will be contained in various plans referenced in the EIS and will be resolved with the BLM prior to issuance of the NTP. All compensation requirements would be captured in a Compensation Plan (mitigation measure BIO-1).
		 BLM will determine, in the environmental analysis, the activity/project-level timing of the compensation (i.e. initiated, completed or a combination) based on the specific resources being impacted, and scope and content of the activity. A 6-month extension may be authorized, subject to approval by the authorizing officer, dependent on the resources impacted and compensation due diligence of the project developer. 		

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