

Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management (BLM)

BLM Office: El Centro Field Office 1661 So. 4 th Street El Centro, CA 92243	Lease/Serial/Case File No: CA-6218 Tracking Number: D070-2016-0023 Tiered Off EA No.: CA-067-2006-12, CA-067-87-16, CA-067-85-11, EA-107-9 and EA-99-100.
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Proposed Action Title/Type: Geothermal Sundry Notice for Installation of a Metal Shade at Ormesa II

Project Numbers: GSN-670-16-30

Location of Proposed Action: East Mesa Field, Holtville, CA 92250

Map: BLM- El Centro Desert Access Guide (DAG)

Legal Description: Township 16 S, Range 17 E, Section 6, 2520' S & 470' E. NW Corner

Applicant: Ormesa LLC

A. Description of the Proposed Action and any applicable mitigation measures:

Ormesa LLC submitted a geothermal sundry notice (GSN-670-16-30) for fabrication and installation of one corrugated metal shade structure at the Ormesa II plant near cooling tower. The size of the structure will be 31' x 31' x 15' and it will have a corrugated metal roofing. Concrete foundations for nine (9) posts will be 42" deep and 14" wide. The structure will also be painted.

This project is within the Ormesa LLC Geothermal Lease CA-6218. All standard stipulations specified in the BLM permits, including Special Provisions, Plan of Operations and Reclamation Plan would apply to the proposed action. The Section 106 status for this project is the following: No Historic Properties Affected. For details on cultural resources in the proposed project area, please refer to pages 10 and 14 of EA#CA-067-87-16. For additional archaeological information refer to pages 33 and 34 of EA#CA-067-85-11 and pages 52-54 of EA#99-100.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans:

LUP Name: California Desert Conservation Area Plan, as amended

Date Approved: 1980

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

This Proposed Action is subject to the California Desert Conservation Area (CDCA) Plan (1980). The project area includes lands designated as Multiple-Use Class L (Limited Use) in the CDCA. Public lands designated as Class L are managed to provide for generally lower-intensity, carefully controlled multiple use of resources, while ensuring that sensitive values are not significantly diminished. Geothermal energy projects are allowed on public lands designated as Multiple-Use Class L pursuant to licenses issued under

43 CFR section 3250, provided National Environmental Policy Act (NEPA) requirements are met. The Proposed Action has been reviewed for conformance with these plans and is consistent with the type and degree of actions allowed under the CDCA plan.

C. Identify applicable NEPA document(s) and other related documents that cover the proposed action.

NEPA Document(s):

2006 Environmental Assessment (**NEPA#: CA-067-2006-12**), for Continuing Geothermal Lease Operations within the East Mesa Known Geothermal Resource Area, by Ormesa, LLC.

1987 Environmental Assessment (**NEPA#: CA-067-87-16**), for the Ormesa II 19.95 MW (Gross) Modular Binary Power Plant and Geothermal Field Development in the East Mesa KGRA, Imperial County, CA.

1985 Environmental Assessment (**NEPA#: CA-067-85-11**), for the Ormesa Geothermal 30 MW (Gross) Modular Geothermal Power Plant and Field development in the East Mesa KGRA, Imperial County, CA.

1979 Environmental Assessment (**NEPA#: EA-107-9**), documenting an addendum to U.S. Geological Survey-Area Geothermal Supervisor's Environmental Analysis 99-100 for East Mesa known Geothermal Resource Area (KGRA).

1978 Environmental Assessment (**NEPA#: EA-99-100**), prepared on Republican Geothermal, Inc.'s (RGI) Plan of Utilization, Development, and Injection, East Mesa KGRA, Imperial County, California

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes. The proposed action analyzed by the 2006 EA is to maintain, upgrade, modernize and replace the developed geothermal facilities within the operations area on geothermal leases held by Ormesa LLC, in order to maintain commercial production rates and retain the rights to these geothermal leases. The current proposed action being covered by this document is a feature of, or essentially the same as, the alternatives selected and analyzed in the existing Environmental Assessment documents. The current proposed action is part of a routine maintenance of existing geothermal facilities.

The current proposed action being covered by this document is a feature of, or essentially the same as, the action analyzed in the existing Environmental Assessment documents. The proposed action is for fabrication and installation of one corrugated metal shade structure for Ormesa II plant containment near cooling tower

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values and circumstances?

Yes. The current proposed action was covered within the range of alternatives analyzed in the existing Environmental Assessment documents. The alternatives in the 2006 EA include the

proposed action, no action and alternatives considered but eliminated from further analysis. The proposed action consists of all the activities that could reasonably be expected to be conducted by the federal geothermal lessee (Ormesa) over a ten-year period within the East Mesa Operation area which are necessary to maintain the geothermal lease production and utilization operations.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standards assessments, recent endangered species listings, and updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the proposed action?

Yes. The 2006 Environmental Assessment noted that approximately the eastern one-half of the East Mesa Operations area is located within the flat-tailed horned lizard East Mesa Management area. The EA also noted that surface activities that would occur as a result of the proposed action have the potential to adversely affect the occupied habitat of the flat-tailed horned lizard in the Management Area and the potential habitat to the west. Ormesa, LLC agreed to implement a series of environmental protection measures derived from conditions of approval at the time of the Environmental Assessment as part of the Proposed Action to minimize the potential impact to the flat-tailed horned lizard. Implementation of the Rangewide Management Strategy mitigation measures would assure that the minimum amount of this new surface disturbance occurs on lands within the East Mesa Management Area, and that all appropriate actions are taken to minimize the adverse effects on flat-tailed horned lizards and habitat.

The analysis in the 2006 Environmental Assessment is adequate; and there has been no substantial change in circumstances or substantial new information relevant to the proposed action. The proposed project would not adversely affect any current sensitive, threatened, endangered or proposed for listing species. In addition, there would not be any runoff to surface or ground water as a result of this current project. No geothermal facilities in East Mesa operations area, including the pipes and headers being replaced are currently located within wetlands or washes where riparian areas would be found.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes. The direct and indirect impacts of the proposed action are not substantially different than those identified in the existing documents. Overall, the proposed ground disturbance and resultant environmental effects would be minimal.

The proposed action would have minimal effects on the quality of the human environment. There would be no hazardous or solid waste generated by the well conversion. No hazardous or solid wastes would be stored on site. The effects of the proposed actions on recreation, visual resources, biological resources and cultural resources are also negligible.

The proposed action would not change the previous analysis of cumulative impacts. The 2006 EA considered the incremental impact of the proposed action and other past, present and reasonable foreseeable future actions within the 6,960-acre (10.8875-square mile) operations area. The past and present activities covered by the EA consist of the limited dispersed recreation and the BLM Hot Springs Long Term Visitors Area (LTVA) and the geothermal exploration, development and utilization projects. It was assumed in the EA that the "foreseeable future" is the anticipated ten-year period for implementation of the proposed action. The EA also assumed that, in addition to the geothermal activities described in the proposed action, the recreational activities at the time EA was done would continue into the reasonable foreseeable future in the same manner and to

same degree as they have been conducted in the present and recent past.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Public involvement in the previous analysis provides appropriate coverage for the proposed action. A draft EA was released for a 30 day public comment period, after which a FONSI and Decision Record were completed.

E. Persons/Agencies/BLM Staff Consulted

//SIGNED//
Carrie L. Simmons, Resources Branch Chief

12/23/2015
Date

Conclusion:

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of NEPA.

//SIGNED//
Signature of Project Lead

//SIGNED//
Signature of Resources Branch Chief

//SIGNED//
Signature of Responsible Official:
Thomas F. Zale, Field Manager

12/24/2015
Date