

## **South Pahrump Valley/ Old Spanish National Historic Trail Area of Critical Environmental Concern Nomination**

June 28, 2024

A Nomination to the U. S. Bureau of Land Management for Area of Critical Environmental Concern (ACEC) Status, Pahrump Valley, Nevada submitted by Basin and Range Watch, Western Watersheds Project, Mojave Green, Old Spanish Trail Association, Center for Biological Diversity, Public Employees for Environmental Responsibility, and Susan Sorrells of Shoshone Village, CA.

To: Las Vegas Field Office, Bureau of Land Management (BLM) 4701 N Torrey Pines Drive Las Vegas, NV, 89130.



Intact Mojave Desert landscape with Mojave yuccas and desert pavement soils, south Pahrump Valley, Nevada.

**General location description:** South Pahrump Valley and the alluvial fans on the west side of the Spring Range, along State Route 160 and Tecopa Road, south of the town of Pahrump, and encompassing and expanding the existing Stump Spring Area of Critical Environmental Concern (ACEC). Clark and Nye Counties, Nevada.

**Acreage:** Approximately 145,000 acres.

<b>2014 Pahrump Valley ACEC Proposal</b>	
<b>Component</b>	<b>Acreage</b>
<b>Pahrump Valley ACEC 2014</b>	<b>36846</b>
<b>Stump Spring Segment OST 2014</b>	<b>19209</b>
<b>Total Acreage</b>	<b>56055</b>

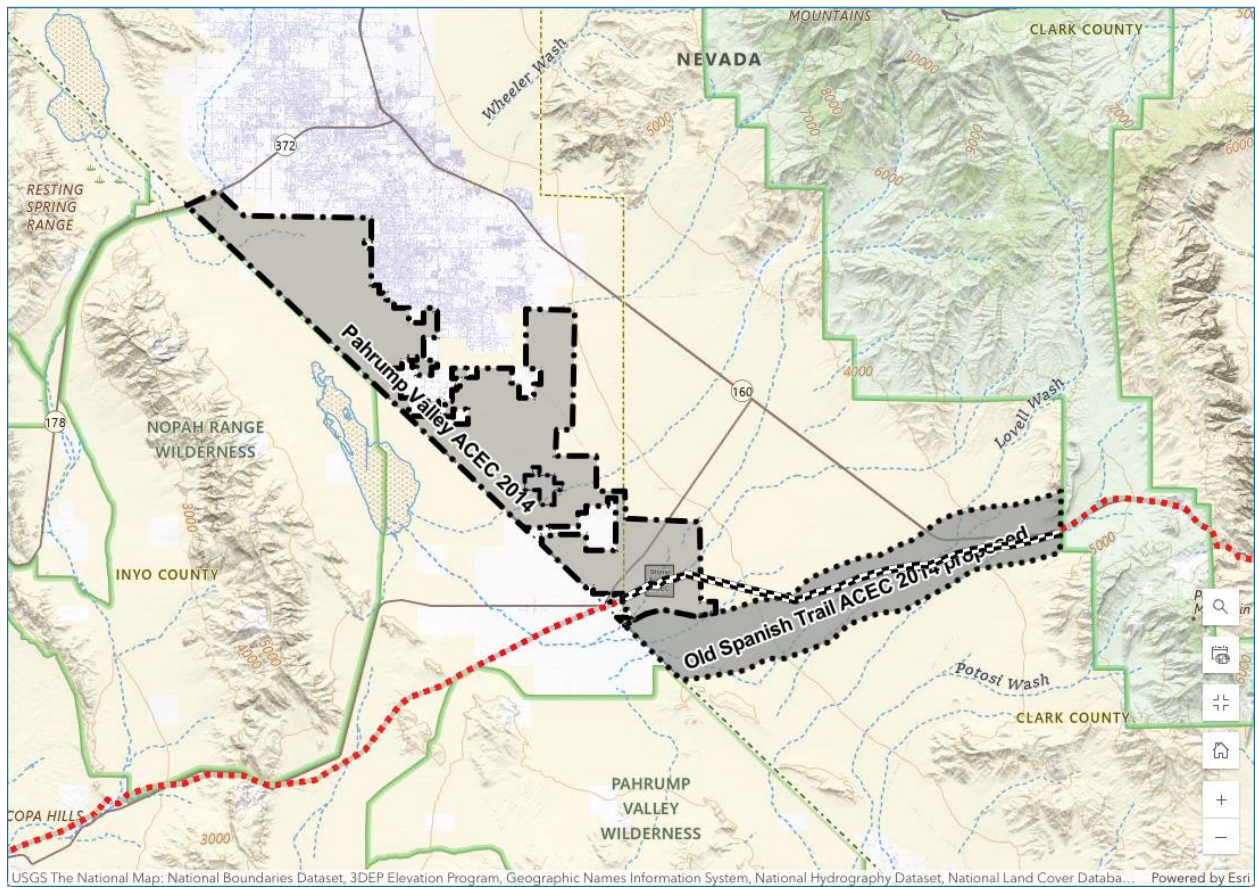
<b>2024 Pahrump Valley ACEC Proposal</b>	
<b>Component</b>	<b>Acreage</b>
<b>Pahrump Valley ACEC with Solar 2024</b>	<b>50566</b>
<b>Stump Spring OSNHT 10 mile diameter Management Corridor ACEC 2024</b>	<b>101237</b>
<b>Joshua Tree Forest 2024</b>	<b>64671</b>
<b>Total Acreage</b>	<b>216474</b>
<b>Total Acreage minus Overlap</b>	<b>144715</b>

## **Maps:**

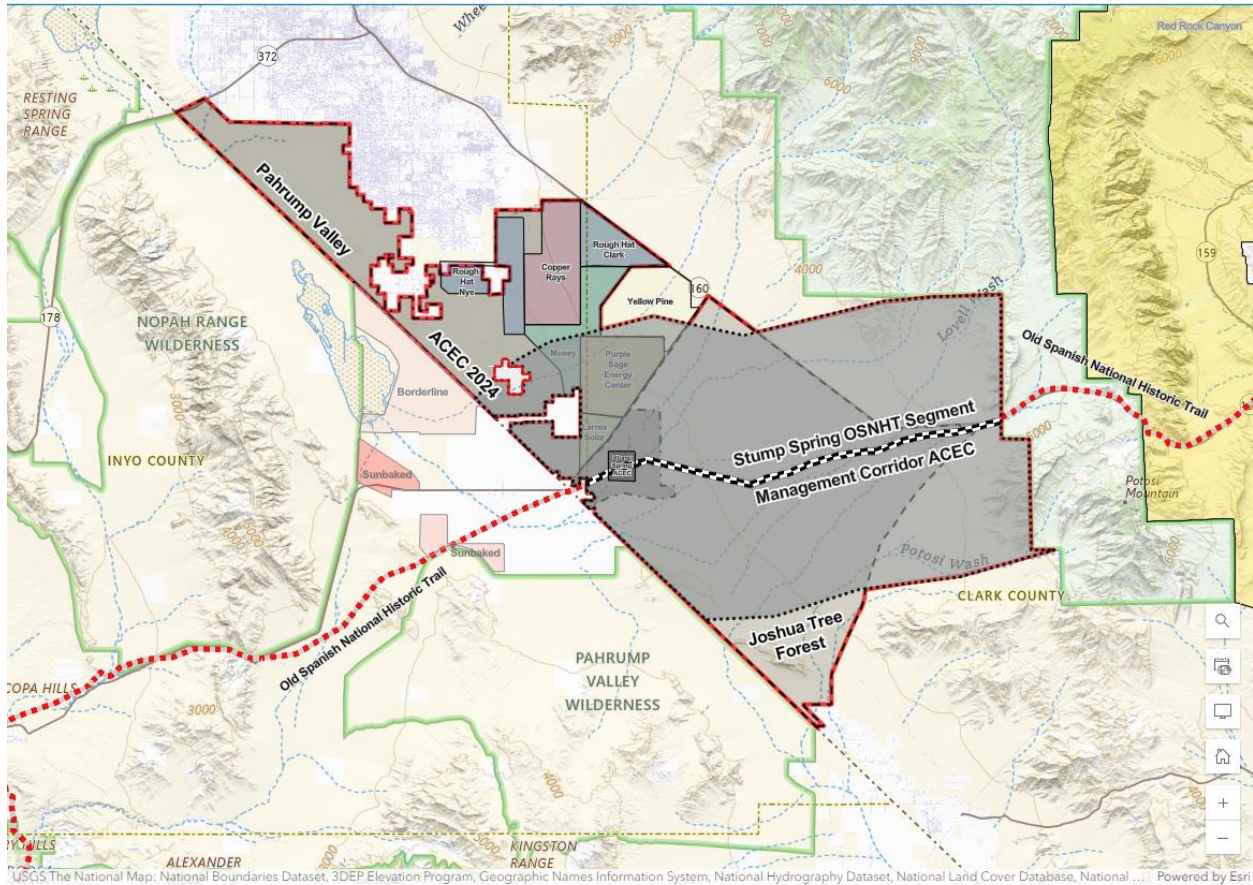
BLM ACEC Nominations for Pahrump Valley. From the proposed Las Vegas and Pahrump Field Offices Resource Management Plan revision (the Environmental Impact Statement and RMP revision was terminated in 2019<sup>1</sup>).

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<sup>1</sup> <https://casetext.com/federal-register/notice-of-termination-of-rmp-revision-for-the-las-vegas-and-pahrump-field-offices-nevada>







**Values considered:** Historic and Cultural Resources, Paleontological Resources, Endangered and Endemic Species, Opportunities for Conservation and Restoration of Intact Mojave Desert Landscapes and Biodiversity.

*To be a designated ACEC, an area must meet at least one relevance criteria and at least one importance criteria as established in BLM Guidance 43 CFR 1610.7-2 and must require special management to protect the values.*

## **RELEVANCE**

*Relevance Criteria: There shall be present a “significant” historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or natural hazard. This generally means that the value, resource, system, process, or hazard is characterized by one or more of the following:*

## Relevance Value

1. **A Significant Historic, Cultural, or Scenic Value** ((including but not limited to rare or sensitive archeological resources and religious or cultural resources important to Native Americans).
2. **Crucial Wildlife Habitat**, a Fish and Wildlife Resource (including but not limited to habitat for endangered, sensitive, or threatened species; or habitat essential for maintaining species diversity).
3. **A Natural Process or System** (including but not limited to endangered, sensitive, or threatened plant species; rare, endemic, or relict plants or plant communities which are terrestrial, aquatic, or riparian; or rare geological features).

## IMPORTANCE

*Importance Criteria: The value, resource, system, process, or hazard described above must have substantial significance and values to satisfy the “importance” criteria. This generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness or cause for concern. A natural hazard can be important if it is a significant threat to human life or property.*

1. **Has Significant Qualities**, which give it special worth, consequence, meaning, distinctiveness, to contribute to ecosystem resilience and protect landscape intactness and habitat connectivity.
2. **Has Qualities or Circumstances** that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change.

## THREATS

The proposed Purple Sage Energy Project (formerly Golden Currant Solar project at 4,456 acres), Copper Rays Solar Project (5,050 acres), Rough Hat Clark County Solar Project (2,400 acres), Mosey Solar, 3,472 acres, and Larrea Solar, 1,055 acres, and transmission lines. Indirect impacts from the approved Yellow Pine Solar Project under

construction may impact the proposed ACEC as well (including dark night sky light pollution, dust emissions, noise, traffic, invasive weed spread, heat island effects, blowing trash, habitat fragmentation, altered surface hydrology, groundwater pumping from new wells and transfer of existing well water by truck, and other impacts from industrial construction over thousands of acres. The view shed of the Old Spanish National Historic Trail is threatened by solar energy development, transmission lines, the proposed Las Vegas Spaceport, and increased recreational activity.

## **SPECIAL MANAGEMENT**

*ACECs must meet the relevance and importance criteria in 43 CFR 1610.7-2(a) and must require special management (43 CFR 1601.0-5(a)) to: 1) Protect the area and prevent irreparable damage to resources or natural systems. Or 2) Protect life and promote safety in areas where natural hazards exist.*

## **SUMMARY of the ACEC NOMINATION**

This petition nominates public lands in the South Pahrump Valley, Nevada, for status as an Area of Critical Environmental Concern. These lands are primarily located in Clark and Nye Counties, Nevada, and the nomination is approximately 145,000 acres in extent. This nomination describes the significant environmental resources and values of these lands, and the need for special management attention. The area highlighted in this nomination contains a significant portion of the Old Spanish National Historic Trail and an ACEC that would contain a ten-mile-wide (five miles on either side of the trail) planning corridor to help protect the historic landscape of the trail. The ACEC would also protect the cultural landscape segments of the Cultural landscape around the Spring Mountains important to Southern Paiute and Shoshone peoples, including a portion of the Salt Song Trail. This could open an opportunity to advance Tribal co-stewardship or traditional and customary uses.

The area also supports a functioning and reproducing Mojave desert tortoise population. A high-water table supports an important mesquite woodlands and habitat for neotropical migrant bird species. Much of the region provides habitat for the Pahrump buckwheat (*Eriogonum bifurcatum*), a rare plant in Nevada. Mammoth fossils and other paleontological resources have been discovered in the area. Much of the nominated area also supports a healthy population of Joshua trees (*Yucca brevifolia*).

The area has very low disturbance compared to other Mojave Desert regions but is singled out for solar energy development because there is an established energy corridor and a large substation in the area. The Yellow Pine Solar Project is now under

construction in the area and we have seen several negative impacts from just this one project including visual, biological/desert tortoise, air quality, invasive weeds and groundwater use.

In 2014, the BLM nominated several ACECs for consideration along with the proposed revision of the 1998 Las Vegas Resource Management Plan (RMP). Under the BLM's own regulations, ACECs must be reviewed for both Relevance and Importance. Even though the RMP revision was cancelled in 2018, the BLM must evaluate all ACEC nominations. Areas having potential for Areas of Critical Environmental Concern designation and protection management shall be identified and considered throughout the resource management planning process (see §§ 1610.4-1 through 1610.4-9). In the revision for all alternatives, BLM's objectives were to reduce and consider threats to the cultural and visual resources.

1. Relevance. There shall be present a significant historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process; or natural hazard.
2. Importance. The above described value, resource, system, process, or hazard shall have substantial significance and values. This generally requires qualities of more than local significance and special worth, consequence, meaning, distinctiveness, or cause for concern. A natural hazard can be important if it is a significant threat to human life or property.

If a Draft RMP, Draft RMP Revision, or Draft RMP Amendment involves ACECs, BLM regulations require state directors to publish a notice in the *Federal Register* listing "each ACEC proposed and specifying the resource use limitations, if any, which would occur if it were formally designated" (43 CFR 1610.7-2(b); MS-1613.32). State offices should include in the description of each ACEC proposed in the notice, whether the designation of the ACEC and subsequent management prescriptions would provide for conservation or restoration opportunities, or the opportunity to advance Tribal co-stewardship or traditional and customary uses.

This nomination joins two of the BLM ACEC nominations from 2014 and adds 64,000 acres of Joshua tree woodlands making it a total of 157,219 acres.

The original nominations were N.3.2.1.19, Old Spanish Trail ACEC at 51,449 acres and N.3.2.22, Pahrump Valley ACEC at 41,770 acres.

Both of these nominations meet the Relevance and Importance criteria to qualify for ACEC status.

### **Outstanding Resources that would meet Relevance and Importance Standards**

#### **Old Spanish National Historic Trail:**

The Old Spanish Trail was a trade route linking Santa Fe, New Mexico and Los Angeles, California, in use between 1829 and 1848. In Nevada, the Old Spanish Trail stretched for more than 150 miles as it ran from one water source to the next. Seven interpretive kiosks are located near the trail from Mesquite to Pahrump, Nevada.

Because of its rich history and national significance, the Old Spanish Trail was designated a National Historic Trail (OSNHT) in 2002, with administrative responsibilities given to the Bureau of Land Management and the National Park Service.

The ACEC nomination would protect a significant portion of the Old Spanish National Historic Trail (OSNHT) in the Pahrump Valley and would maintain the 10-mile corridor, five miles on either side of the trail (as recommended in the Old Spanish National Historic Trail Comprehensive Administrative Strategy (BLM and NPS, 2017). The proposed ACEC would expand the existing 646-acre Stump Spring ACEC, and also incorporate minor or intermittent springs to the northwest of Stump Spring. The mesquite areas throughout this valley constitute an important part of the Pahrump Paiute's cultural landscape as well as the historic landscape of the Old Spanish National Historic Trail.

Both the BLM and NPS prepared the Old Spanish National Historic Trail Comprehensive Administrative Strategy (OSNHTCAS) in 2017. The Strategy states:

*"Nature and Purpose of the Old Spanish National Historic Trail –*

*Many of the more than 2,700 miles of the Old Spanish Trail are characterized by stark landscapes that recall those described by early users of the trail. The trail corridor is informally considered by the NPS to lie five miles on either side of the centerline of the trail alignment to include the nearest elements of the view shed, parts of the cultural landscapes, landmarks, and traditional cultural properties near the trail. The BLM follows direction from their trail administration manual to establish a trail corridor. (p. 5).*

*Administrative responsibilities include overall trail-wide leadership, such as coordination, planning, and signing; resource preservation and protection (such as protection of high potential sites and segments); review of trail site and segment development; trail-wide resource inventories and mapping (including developing and maintaining geographic information systems); certification, interpretation, and visitor use cooperative/ interagency agreements; and limited financial assistance to other government agencies, landowners, interest groups, and individuals." (p. 16).*

## **Cultural Landscape and Salt Song Trail:**



The ACEC would protect a significant portion of the Salt Song Trail and associated Cultural Landscape in Pahrump Valley, Nevada, near the California border. The area includes Stump Spring and Brown's Spring. The mesquite areas throughout this valley constitute an important part of the Pahrump Paiute's cultural landscape.

The view-scape and desert lands need to be preserved so as to keep this landscape whole, and protect this portion of the Trail.

The view-shed of the Salt Song Trail is threatened by solar energy development, transmission, the Las Vegas Spaceport and recreational activity.

## Salt Song Trail Map of Nuwuvi (Southern Paiute) Sacred Landscapes, Culture Areas and Bands



Salt Song Trail map by the Cultural Conservancy.<sup>2</sup>

<sup>2</sup> [The Salt Song Trail Map: the Sacred Landscape of the Nuwuvi People — The Cultural Conservancy \(nativeland.org\)](http://www.nativeland.org/salt-song-trail-map-the-sacred-landscape-of-the-nuwuvi-people)

## **Mesquite Woodlands:**

Portions of the nomination have a high water-table and support both honey mesquite and catclaw acacia woodlands.

The area supports neotropical bird habitat—the size of mesquite trees and largely unfragmented mesquite groves is unique compared to other areas of desert in the region.

Western Honey Mesquite (*Prosopis glandulosa*, also called *Neltuma g.*) are located in the proposed ACEC. These trees have been impacted by water drawdown but still are a unique ecological part of this desert that should be avoided. They provide habitat to several BLM Sensitive and Special Status Species.<sup>3</sup> Phainopeplas (*Phainopepla nitens*) are often observed in these south Pahrump valley mesquite groves.

Mesquite trees furnish shade and wildlife habitat where other trees will not grow. They will often be found in alkaline soils near water holes.

Although a single flower of the blossom is only a few millimeters long, they are clustered into a yellow blossom attracting many different types of pollinators, including native bees, bumblebees, flower flies, and hummingbirds.

Mesquite beans are a staple food for many species in the area, including desert tortoise, desert cottontails (*Sylvilagus audubonii*), and black-tailed jackrabbits (*Lepus californicus*).

*“Historically, mesquite bosques provided a unique and valuable ecosystem for a variety of animal and plant species; however, in recent times many of these woodlands have been either eliminated or heavily reduced and fragmented by anthropogenic influences. Associated with loss and reduction of these bosques is a decrease in populations of many plant and animal species dependent upon this riparian type.”*<sup>4</sup>

Since this is a unique woodland, it should be preserved and protected from solar development.

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<sup>3</sup> [2017 Final BLM NV Sensitive and Special Species Status List .pdf](#)

<sup>4</sup> [Riparian research and management: Past, present, future. Volume 2 \(usda.gov\)](#)



Extensive honey mesquite groves in badlands in south Pahrump Valley.



Honey mesquite in south Pahrump Valley.

**Joshua Tree:**



Joshua trees (*Yucca brevifolia*) are found extensively across the southern Pahrump Valley, especially on higher alluvial fans, but also scattered on lower basin Mojave Desert scrub areas, in Nevada and California. Pahrump Valley contains extensive, healthy, large trees and populations of what may be eastern Joshua trees (*Yucca brevifolia jaegeriana*), but more work needs to be done. Joshua trees are declining across their range from development pressures, climate change, drought mortality. These healthy, reproducing populations need to be conserved.



Joshua tree in south Pahrump Valley, NV.

### **Mojave Desert Tortoise:**

The listed population of the desert tortoise has experienced drastic declines (Allison and McLuckie 2018) and the International Union for Conservation of Nature's (IUCN) Species Survival Commission, Tortoise and Freshwater Turtle Specialist Group, now considers the Mojave desert tortoise to be Critically Endangered (Berry et al. 2021).

The Mojave Population of the Agassiz's desert tortoise was listed as Threatened by the US Fish and Wildlife Service (USFWS) in 1990 followed by the designation of critical

habitat in 1994. In 2000, the USFWS began systematically surveying tortoise populations in critical habitat and recovery unit areas to determine population trends. Based on their findings which are briefly summarized in the chart, we convinced that the Mojave Population of the Agassiz's desert tortoise should be federally listed as Endangered rather than Threatened.

Recovery Unit: Designated Critical Habitat Unit/Tortoise Conservation Area	Surveyed area (km <sup>2</sup> )	% of total habitat area in Recovery Unit & CHU/TCA	2014 density/km <sup>2</sup> (SE)	% 10-year change (2004–2014)
<b>Western Mojave, CA</b>	<b>6,294</b>	<b>24.51</b>	<b>2.8 (1.0)</b>	<b>–50.7 decline</b>
Fremont-Kramer	2,347	9.14	2.6 (1.0)	–50.6 decline
Ord-Rodman	852	3.32	3.6 (1.4)	–56.5 decline
Superior-Cronese	3,094	12.05	2.4 (0.9)	–61.5 decline
<b>Colorado Desert, CA</b>	<b>11,663</b>	<b>45.42</b>	<b>4.0 (1.4)</b>	<b>–36.25 decline</b>
Chocolate Mtn AGR, CA	713	2.78	7.2 (2.8)	–29.77 decline
Chuckwalla, CA	2,818	10.97	3.3 (1.3)	–37.43 decline
Chemehuevi, CA	3,763	14.65	2.8 (1.1)	–64.70 decline
Fenner, CA	1,782	6.94	4.8 (1.9)	–52.86 decline
Joshua Tree, CA	1,152	4.49	3.7 (1.5)	+178.62 increase
Pinto Mtn, CA	508	1.98	2.4 (1.0)	–60.30 decline
Piute Valley, NV	927	3.61	5.3 (2.1)	+162.36 increase
<b>Northeastern Mojave</b>	<b>4,160</b>	<b>16.2</b>	<b>4.5 (1.9)</b>	<b>+325.62 increase</b>
Beaver Dam Slope, NV, UT, AZ	750	2.92	6.2 (2.4)	+370.33 increase
Coyote Spring, NV	960	3.74	4.0 (1.6)	+ 265.06 increase
Gold Butte, NV & AZ	1,607	6.26	2.7 (1.0)	+ 384.37 increase
Mormon Mesa, NV	844	3.29	6.4 (2.5)	+ 217.80 increase
<b>Eastern Mojave, NV &amp; CA</b>	<b>3,446</b>	<b>13.42</b>	<b>1.9 (0.7)</b>	<b>–67.26 decline</b>
El Dorado Valley, NV	999	3.89	1.5 (0.6)	–61.14 decline
Ivanpah, CA	2,447	9.53	2.3 (0.9)	–56.05 decline
<b>Upper Virgin River</b>	<b>115</b>	<b>0.45</b>	<b>15.3 (6.0)</b>	<b>–26.57 decline</b>
<i>Red Cliffs Desert</i>	<i>115</i>	<i>0.45</i>	<i>15.3 (6.0)</i>	<i>–26.57 decline</i>
<b>Range-wide Area of CHUs - TCAs/Range-wide Change in Population Status</b>	<b>25,678</b>	<b>100.00</b>		<b>–32.18 decline</b>

The table includes the area of each Recovery Unit and Tortoise Conservation Area (TCA), percent of total habitat, density (number of breeding adults/km<sup>2</sup> and standard errors = SE), and the percent change in population density between 2004 and 2014. Populations below the viable level of 3.9 breeding individuals/km<sup>2</sup> (10 breeding individuals per mi<sup>2</sup>) (assumes a 1:1 sex ratio) and showing a decline from 2004 to 2014 are in red.

The Clark County Multiple Species Habitat Conservation Plan (MSHCP) was established in 2000 to conserve a wide variety of species and their habitats throughout the county, including the Mojave desert tortoise. The MSHCP has been prepared pursuant to Section 10(a) of the Endangered Species Act of 1973, as amended (Act). The MSHCP identifies those actions necessary to maintain the viability of natural habitats in the county for approximately 232 species residing in those habitats. Some of those species and habitats are present on the solar project sites and applications. Grazing allotments were permanently closed decades ago in South Pahrump Valley in order to conserve tortoise habitat and intact landscapes. Yet now large-scale solar development threatens these same habitats and the tortoise.



In 2021, biologists removed nearly 3 times the amount of desert tortoise predicted to be on the adjacent Yellow Pine Solar Project site on a record-breaking drought year, many of which were killed by predators. Eleven additional tortoises were located on the site since the original translocation—one of which was run over by a vehicle (personal communication, July 29, 2022, BLM).



Active desert tortoise burrow with large adult tortoise in the burrow, north of Tecopa Road, south Pahrump Valley, NV.



### **Intact Mojave Desert Landscapes:**

The project would impact high quality Mojave Desert habitat and remove several thousand Mojave yucca plants (*Yucca schidigera*). This area is an intact landscape largely undisturbed by development.

### **Wildlife Connectivity:**

The proposed ACEC would provide important connectivity for wildlife between the Toiyabe National Forest in the Spring Range, across the Pahrump Valley to the Pahrump Valley Wilderness Area and Nopah Wilderness Area. Mule deer (*Odocoileus hemionus*) and desert bighorn sheep (*Ovis canadensis*) have been observed in this area.

### **Rare Plants – Pahrump Buckwheat:**

Pahrump Valley buckwheat (*Eriogonum bifurcatum*) is a BLM Sensitive Species occurring on alkaline sand flats and slopes, within saltbush communities at elevations of 1,969–2,700 feet. The species is associated with Corncreek-Badland-Pahrump soils due to its salinity and association with relict lakebeds and lake terraces. Evaluation of this soil type during reconnaissance surveys indicated the habitat for Pahrump Valley buckwheat is limited. Pahrump Valley buckwheat is a BLM Sensitive species, meaning population or distribution of the wildlife is in a significant decline, the population is threatened as a result of disease or predation or ecological or human causes, and/or the primary habitat of the wildlife is deteriorating.



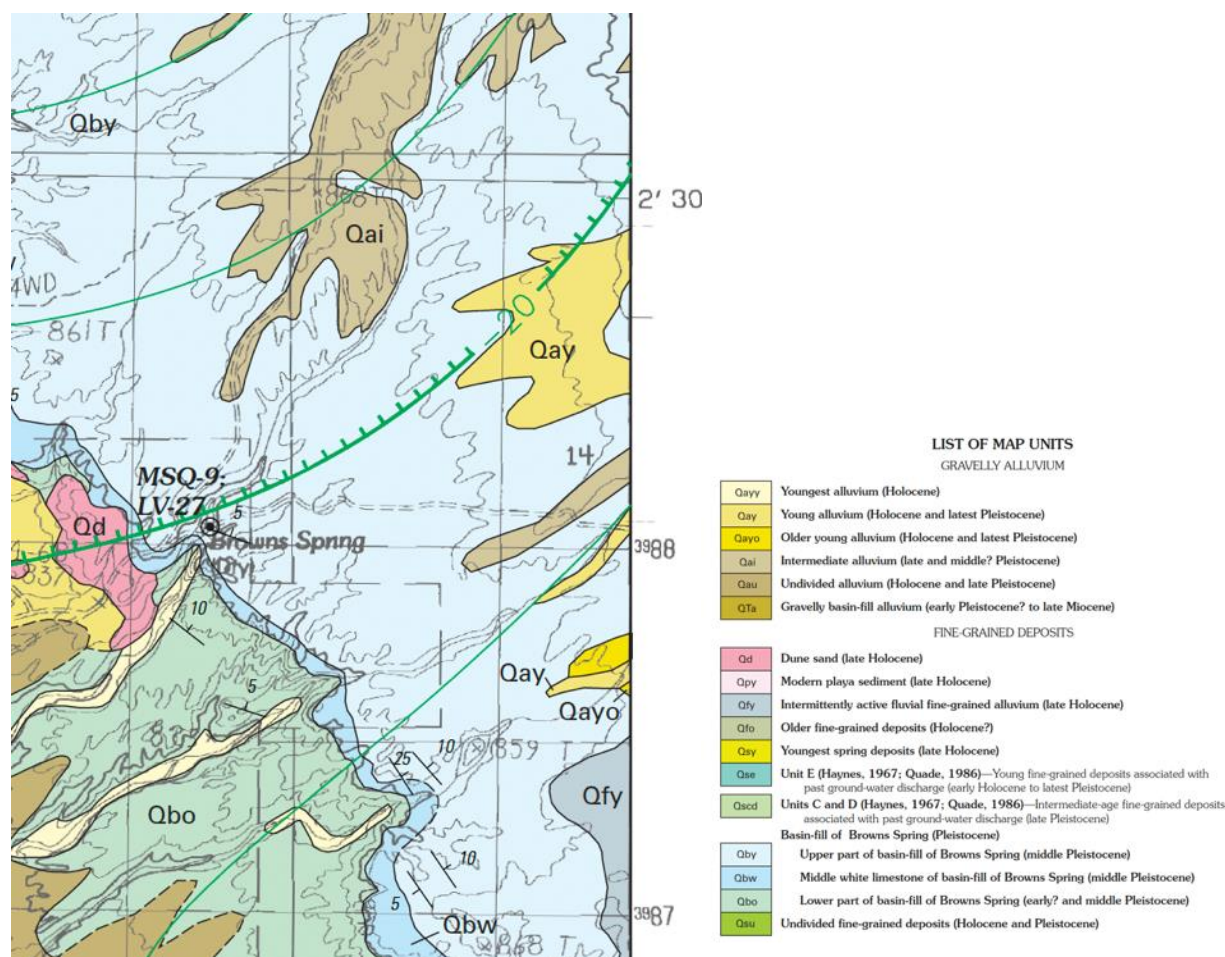
The region contains one of three known populations for the species. It is vulnerable to development and sensitive to hydrologic modification. Solar applications threaten these populations.

Other rare plants may inhabit this area, and botanical surveys should be undertaken to better understand these populations.

### Paleontological Resources:

The clay-based badlands in the region contain fossils. The badlands are Quaternary basin fill formed as groundwater discharge deposits at the base of the alluvial fan. Much of the area could contain fossils of Plio-Pleistocene megafauna.

The following geologic map of the Mound Spring Quadrangle, Nye and Clark Counties, Nevada, shows a portion of the proposed solar project site on top of mid and early Pleistocene Brown's Spring basin fill which could hold fossils. Brown's Spring is at the end of the Front Site Road.



From: <https://pubs.usgs.gov/mf/2002/mf-2339/mf-2339.pdf>

These sites are protected by the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11). This law was established 12 years after the last revision of the RMP.

*The primary legislation pertaining to fossils from NPS and other federal lands is the Paleontological Resources Preservation Act of 2009 (PRPA) (16 U.S.C. § 470aaa 1-11) which was enacted on March 30, 2009 within the Omnibus Public Land Management Act of 2009. PRPA directs the Department of Agriculture (U.S. Forest Service) and the Department of the Interior (National Park Service, Bureau of Land Management, Bureau of Reclamation, and Fish and Wildlife Service) to manage and protect paleontological resources on Federal land using scientific principles and expertise. The Secretary shall develop appropriate plans for inventory, monitoring, and the scientific and educational use of paleontological resources, in accordance with applicable agency laws, regulations, and policies. These plans shall emphasize interagency coordination and collaborative efforts where possible with non-Federal partners, the scientific community, and the general public. (see [Paleontological Resources Preservation Act.pdf \(blm.gov\)](#))*

A diverse assemblage of fossil megafauna was recovered from the Las Vegas Valley in southern Nevada, providing opportunities for paleontologists to study the paleoecology of these deposits. Vetter (2007) undertook isotopic reconstruction of diet in extinct large herbivores: *Mammuthus*, *Equus*, *Bison*, and *Camelops* from the Late Pleistocene assemblage of megaherbivore teeth recovered from the Gilcrease spring mound.

The Tule Springs fauna was recovered from the northwestern Las Vegas Valley and provides the most complete Pleistocene faunal record for the area. The Tule Springs excavation in the 1960s yielded fossil material of invertebrates (primarily molluscs), amphibians, reptiles, birds, small mammals, and large carnivores and herbivores.

The formations are similar to those located in the Tule Springs Fossil Beds National Monument. The Bureau of Land Management needs to coordinate with the National Park Service to ensure that Best Management Practices are used to protect any fossil on the Purple Sage (Golden Curreant) solar project site.

Indeed, *Mammuthus columbi* fossils have been found in Pahrump Valley, NV. Conin et al (1998) found two mammoth tooth fragments in Pahrump Valley, held in the author's collection.

In June of 2023, Basin and Range Watch co-founder Laura Cunningham located a Columbian mammoth fossil on the site of the proposed Purple Sage solar project (formerly Golden Curreant Solar Project) in badlands.

The BLM has stated that the solar developer would cut and fill the topography for the proposed solar project which would obliterate any fossils located on the site. The recent mammoth tooth fossil find prompted the BLM to require the solar developer to conduct a paleontological survey before the project review can proceed further.

The rugged badlands south of Pahrump represent spring-fed paleowetland deposits that are <sup>5</sup>tens of thousands of years old, and during the Pleistocene these wetlands were habitat for foraging mammoths. There could be tusks and other fossil remains here—the area should be protected and studied.

The fossil mammoth molar was left in place, and the BLM notified of its presence.



Pleistocene badlands of fossiliferous paleowetland formations in south Pahrump Valley, NV, north of Tecopa Road. This area has utility-scale solar applications over it.





Columbian mammoth molar as found by Laura Cunningham at the site of the proposed Purple Sage (Golden Currant) solar project in south Pahrump Valley, NV.

### **Threats:**

Six utility-scale solar projects are proposed and in varying stages of the application process, covering most of the public lands in South Pahrump valley. The 3,000-acre Yellow Pine Solar Project is now under construction and three other projects, are being reviewed under the NEPA process. In total of 19,200 acres or 29 square miles.

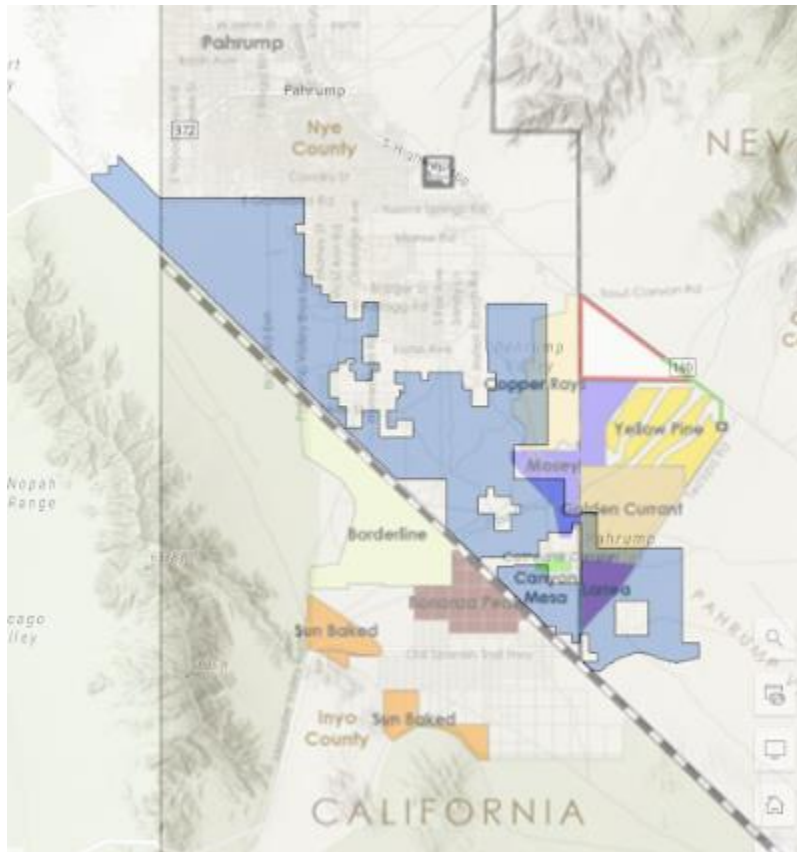
New transmission would be built with solar projects and create collision hazards with neotropical migrants.

The Las Vegas Spaceport would develop 240 acres and hold noise intensive air races all over the region.

Increased population creates additional demand for water and the area is growing.

Increased recreation in the area will result in impacts to local species and cultural sites.

The proposed Purple Sage Energy Center (formerly Golden Curreant) would need over 1,000 acre-feet of water for construction and 200-acre feet a year for operation for 30 years which is 6,000 acre-feet. All basins are over-allocated.



19,000 acres of large-scale solar energy proposals partially overlap ACEC nominations.

### **Designation and Management:**

This ACEC could be established through plan amendments to the Southern Nevada Resource Management Plan (RMP), for approval of a largescale solar and transmission projects in Clark County. At this time, BLM is reviewing 4 of these projects through NEPA. This ACEC nomination is, however, not meant to be used as mitigation for a utility-scale solar project approval in the area. This ACEC nomination is proposed to conserve cultural and biological resource values in the Pahrump Valley.

We understand that the BLM designates ACEC's for both cultural and/or biological resources. Given the information briefly summarized herein, we strongly suggest that the new Pahrump Valley Area of Critical Environmental Concern be designated to protect both cultural and biological resources identified herein.

We understand that designation of a new ACEC would require development of an associated ACEC management plan, and that interested parties may provide through

both public input and volunteer efforts support of such a planning effort. Herein, we extend our commitment to assist the BLM by all legal means available to help provide further baseline information and future support to complete the new ACEC,

No new large-scale renewable energy projects should occur in this ACEC, and we recommend a 0.5 % disturbance cap on this high-value habitat. Future growth of southern Nevada population centers of Las Vegas and Pahrump, Nevada, could bring more urbanization, recreation and off-road vehicles to the site, increasing the potential damage to cultural resources and take of wild tortoises. Area of Critical Environmental Concern designation and management would help conserve cultural resources and the best contiguous tortoise habitat that is in lands more remote from development centers and high recreational use.

An ACEC designation would fulfill management goals for the Old Spanish National Historic Trail and could further fulfill Clark County MSHCP requirements for protection of covered species and their habitats, as solar energy development and urbanization continue to burgeon. Prudent management prescriptions that may apply to this ACEC include: (1) Exclusion of renewable energy projects, (2) Withdrawal of all lands within the expanded ACEC boundary from mineral entry, (3) Acquisition of private lands from willing sellers and designation of vehicle routes, (4) Botanical surveys for special status plants listed herein and incorporation of conservation measures for the plants and their habitat where new occurrences are identified, and (5) Adoption of other pertinent protection measures as necessary to protect sensitive biological and cultural resources.

The ACEC nomination is not meant to close existing roads, routes or existing developments.

Thank you,

A handwritten signature in blue ink, appearing to read "Kevin Emmerich".

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## References:

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