



October 23, 2009  
Gregory Helseth  
Las Vegas Field Office  
Bureau of Land Management  
4701 North Torrey Pines Drive  
Las Vegas, NV 89130-2301

Dear Greg,

On behalf of the Nevada Wilderness Project (NWP) and The Wilderness Society, we wish to provide comments during the scoping period for the NextLight Silver State North and South solar projects located near Primm, Nevada (applications NVN-085077 and NVN-085801; hereafter referred to as "NextLight - Primm") that will be undergoing an Environmental Impact Statement (EIS) in the near future. Several issues merit consideration during the development of an EIS, especially with respect to mitigating the impacts from the loss of key wildlife habitats in the Mojave Desert. I respectfully request that you fully consider the following points in the development of the EIS.

First, it is NWP's position that immediate steps are required to combat the effects of global climate change, and that a transition to renewable energy production is key to meeting this critical need. Moreover, we recognize that this transition needs to happen rapidly or we will be unable to reverse the catastrophic consequences of climate change. Along with this, we are committed to making sure that a renewable energy transition occurs in a fashion that is smart from the start. To do this, we must mitigate the damage to our wildlife habitats that occurs from accelerated development of renewable energy projects on lands in Nevada, and we must do so with both funding mechanisms and additional landscape designations.

Below are several key wildlife needs that can provide both on-site and off-site opportunities to mitigate for the development 7,840 acres of Bureau of Land Management lands. Years of rapid growth and development in the region have fragmented and degraded wildlife populations and their habitats, and renewable energy projects will exacerbate these concerns. Due to the extraordinary cumulative impacts of both energy and non-energy development in southern Nevada, we believe that the BLM needs to have a broad strategy for mitigation that goes beyond site-specific impacts of development. We have identified several wildlife-related issues that can be addressed as possible mitigation that would account for the broad need for conservation of wildlife habitats in southern Nevada. These are rough outlines and proposals would need to be fully developed in coordination with state and federal wildlife agency personnel:

- A recent desert tortoise habitat model from the United States Geological Service (Nussear et al, 2009, Modeling Habitat of the Desert Tortoise [*Gopherus agassizii*] in the Mojave and Parts of the Sonoran Deserts of California, Nevada, Utah, and Arizona: U.S. Geological Survey Open-File Report 2009-1102) shows that the proposed solar project will occupy high quality tortoise habitat. Mitigation for desert tortoise will need to occur with translocations and tortoise-proof fencing prior to site preparation and construction. With photovoltaic identified as the means of energy production, we strongly encourage installation methods that will leave as much intact desert habitat as possible. A research study could be established to determine desert tortoise compatibility with a photovoltaic solar energy installation. Such a study might greatly advance our understanding of desert tortoise compatibility with utility-scale solar energy production.
- The banded Gila Monster, *Heloderma suspectum cinctum*, is a state protected species that occurs in the Mojave Desert. It is thought to occur on or near the project site. No inventory or genetic analysis has been done to date in southern Nevada. More inventory and investigations need to be

conducted to determine its range, status, trend, and genetics. A research project directed at this species is needed, and a thorough inventory of the project site for this species should be made.

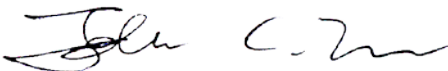
- The Mojave shovel nosed snake, *Chionactis occipitalis occipitalis*, occurs in the project area. No inventory or species classification work has been performed on this snake in this portion of southern Nevada. A research project to determine the current status and trend of the species is needed, and a thorough inventory of the project site for this species should be made.
- Important movement corridors for desert bighorn sheep, *Ovis canadensis nelsoni*, occur between Boulder City and Hoover Dam along highways 93 and 95, and to the Highland Spring, McCullough and Lucy Grey Ranges to the east. Landscape permeability is being seriously compromised as development, increased vehicular traffic, and other habitat fragmentation has impacted bighorn movement. Solar development on the west face of the Lucy Grey Range will likely further impact desert bighorn sheep. We believe that there are mitigation opportunities to offset this and the past impacts on public and private lands that can be addressed in a broader mitigation strategy. An example is the need for an overpass structure near Boulder City that would allow bighorn sheep movements along historic movement corridors.

In addition to these potential mitigation opportunities, we encourage the BLM to develop a broader, administrative policy to identify and implement landscape level protections that would offset the loss of wildlife habitat from renewable energy development with strong, well-managed protections on other BLM lands. Again, there are cumulative impacts from urban development, and the associated use and abuse of public lands that have followed. Renewable energy development, though necessary for the planet, will have additional impacts on BLM managed lands, and these impacts need to be addressed.

Landscape protections might best occur as administratively designated Areas of Critical Environmental Concern (ACEC) until the agency develops other administrative designations that might suitably provide permanent habitat conservation of valuable landscapes. These ACECs would need strong implementation of conservation and mitigation in their establishment, permanent mineral withdrawals and management language that clearly specifies the value of wildlife habitat as the priority purpose of these set-asides.

We have appreciated the open exchange of information with both NextLight and the BLM, and we look forward to continued engagement on this and other renewable energy projects. Please inform me of any further developments related to the NextLight - Primm solar project. I am happy to make myself available to meet to discuss or further develop the mitigation options that NWP has provided.

Sincerely yours,



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