



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Southern Nevada District Office
4701 N. Torrey Pines Drive
Las Vegas, Nevada 89130
<http://www.blm.gov/nevada>

In Reply Refer To:
NVN-099875

NOV 16 2022

Memorandum

To: Angelita S. Bulletts, District Manager

From: Coreen Francis
Acting Field Manager, Las Vegas Field Office

Subject: Application Evaluation Complete: BLM Continuing Processing of Application and Initiation of the National Environmental Policy Act (NEPA) Process for the Townsite Solar 2 Project Application

The BLM Southern Nevada District Office has conducted an evaluation of the application for the proposed Townsite Solar 2 Project (Project) in accordance with the requirements of 43 CFR 2804.25 (e)(2)(iii). After careful consideration of the evaluation that was conducted, the BLM will continue processing the application and proceed with initiation of the NEPA Process.

Background

On June 8, 2020, Skylar Energy Resources, LLC submitted a right-of-way application to the BLM Las Vegas Field Office (LVFO) for the Project. The Project includes the construction, operation, and eventual decommissioning of a 19 MW alternating current solar photovoltaic power generating facility with battery storage facility on approximately 80 acres of BLM-managed public land located in Clark County, Nevada, four miles southwest of Boulder City, Nevada. Power from the Townsite Solar 2 Project would be delivered to the Townsite Solar 1 Substation via a new 34.5-kV underground and overhead interconnection line. A new 34.5 kV to 230 kV step-up transformer would be installed within the Townsite Solar 1 Substation. Skylar Energy Resources, LLC anticipates an average estimated workforce for the Project to be up to approximately 200-400 workers over the 12-month construction timeframe and a staff of approximately 2-3 full-time workers during operations for 30 years.

Regulations require the BLM to evaluate the Project according to provisions found in 43 CFR §2804.25(e)(2)(iii) and, based on these evaluations, either deny the application or continue processing. The Project is not automatically subject to the Decisions made in the Final Programmatic Environmental Impact Statement for Solar Energy Development in Six Southwestern States (Solar PEIS), since the proposed generation is less than 20MW (19MW). Therefore, the Variance process described in the Solar PEIS was not required for the Townsite Solar 2 Project application.

In accordance with 43 CFR §2804.25(e) and BLM Southern Nevada District Office IM NV-SNDO-2020-001, the BLM LVFO applied screening criteria and determined that the application was a high priority for processing on September 17, 2021. In February of 2021, the BLM notified Skylar Energy Resources, LLC that processing work was beginning on the application. As part of the application evaluation process, the BLM LVFO held preliminary meetings with the Project applicant to identify potential land use and siting constraints and conflicts, environmental issues, and sensitive resources.

Evaluation

Regulations include evaluation provisions that must be considered by the BLM when making the determination to either deny the application or continue processing. The provisions and related discussion specific to the application are included below.

Information provided by the applicant

Skylar Energy Resources, LLC has provided information on the project to the BLM, including the right-of-way application, the preliminary Plan of Development, and initial baseline resource survey information.

Input from other parties, such as Federal, State, and local government agencies, and tribes

The BLM Southern Nevada District conducted an Agency meeting with Federal, State, local, and Tribal governments for the Townsite Solar 2 Project on August 30, 2022 and provided an agency input period until September 15, 2021. This early Agency coordination yielded concerns related to utilizations and location of existing roads vs. building new roads, vegetation management, and federal and state expectations and standards. Agency input and comments are included in the input summary report (transmitted with this Memorandum).

Engagement with Tribal governments included the BLM sending letters to the Chemehuevi Indian Tribe, Colorado River Indian Tribes, Fort Independence Indian Community of Paiute, Fort Mojave Indian Tribe, Hualapai Tribe, Kaibab Band of Paiute Indians, Las Vegas Paiute Tribe, Moapa Band of Paiutes, Paiute Indian Tribe of Utah, San Juan Southern Paiute Tribe, The Hopi Tribe, Twenty-Nine Palms Band of Mission Indians, Utu Utu Gwaitu Paiute Tribe (Owens Valley Paiute Benton Reservation), Big Pine Paiute, and Lone Pine Paiute Tribes. The Project was presented at government-to-government consultation meetings and field visits were conducted for the project area. The BLM emailed the Tribes on August 15, 2022, to invite them to attend an interagency meeting on August 30, 2022 as an opportunity to learn more information about the proposed solar projects. Tribal Consultation for the Project is ongoing and more details on can be found in the Input Summary Report. To-date the Tribes consulted with have not expressed any major concerns with the project.

Comments received in preliminary application review meetings

The BLM LVFO reviewed the submitted right-of-way application for the Project utilizing the Southern Nevada District Office renewable energy project processing prioritization process. During the prioritization process, the BLM reviewed the project application related to regulatory compliance criteria from 43 CFR 2804.35, local considerations, and resource considerations. The results of the prioritization evaluation were transmitted to Skylar Energy Resources, LLC through the Prioritization Determination letter and worksheet, which included BLM comments

and documentation for those potential resource conflicts from the proposed Project. The Project prioritization letter and worksheet are transmitted with this memorandum.

Comments received in public meeting

As required under the application evaluation process, the BLM LVFO has conducted public meetings as part of our ongoing outreach. Engagement and early coordination with the public was conducted through a virtual public information forum. A Virtual Public Information Forum for the Project was held September 1, 2022 (with 8 attendees) and the public input period for the project was from August 12 to September 15, 2022. Comments and input received during the public information forums and input period are compiled and summarized in a report, which is transmitted with this memorandum. In summary, the public expressed concern for the solar project prioritization, consideration for alternatives, impacts to wildlife and vegetation resources within the project area, mitigation planning, climate change, water resources and use, and cumulative effects.

Whether the application proposes to site the development appropriately (e.g. outside of designated leasing area or exclusion area)

The Project is sited outside of any Designated Leasing Areas or Solar Energy Zones. The Project is not located on lands excluded from solar energy development. The Project is collocated with other proposed and authorized solar energy development projects located on adjacent City lands in the Eldorado Valley area. The BLM will assess the appropriate size/configuration of Project through alternatives development in the NEPA process, with careful consideration given to current research and industry practices related to efficient land use (acres/megawatt).

Whether the application addresses known resource values

Some of the key resource concerns identified through the prioritization process, and public, Agency, and Tribal input included: project area where desert tortoise connectivity would not be able to be maintained due to the presence of other land uses in the area though the project is located in lands that have been identified as Priority 1 Desert Tortoise Area identified with in the Solar PEIS, the Old Spanish National Historic Trail segment in the vicinity of the project is not considered to be a high potential route segment and the setting of the trail in this area is already substantially modified by the presence of mining operations, major highways adjacent to the trail alignment, and current and planned solar facilities nearby, water resources and use, cumulative effects, and concerns relating to botanical and wildlife present within the project area.

It is important to note that those known resources examined at this stage of the right-of-way application process do not necessarily reflect all known resources for the Project. Additional resources may be identified or examined during the NEPA process.

Determination

The BLM LVFO has completed the application evaluation for the Townsite Solar 2 Project application in accordance with 43 CFR §2804.25(e)(2)(iii). Stakeholder engagement efforts by the BLM identified that the Project has the potential for some resource conflicts. However, the Project did not raise any issues that would counteract the orderly administration of public lands or conflict with any competing priority of national interest. Therefore, after careful consideration of the evaluation that was conducted, the BLM will continue processing the application and

proceed with initiation of the NEPA Process. Proceeding with processing of the Project does not render project approval or otherwise entitle the applicant in any way, nor does it create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its departments, agencies, instrumentalities or entities, its officers or employees, or any other person.



Coreen Francis
Acting Field Manager
Las Vegas Field Office

11/16/22
Date

Concurrence / Non-Concurrence




Angelita S. Bullets
District Manager
Southern Nevada District

11/16/2022
Date

**BLM
Southern Nevada
District Office**

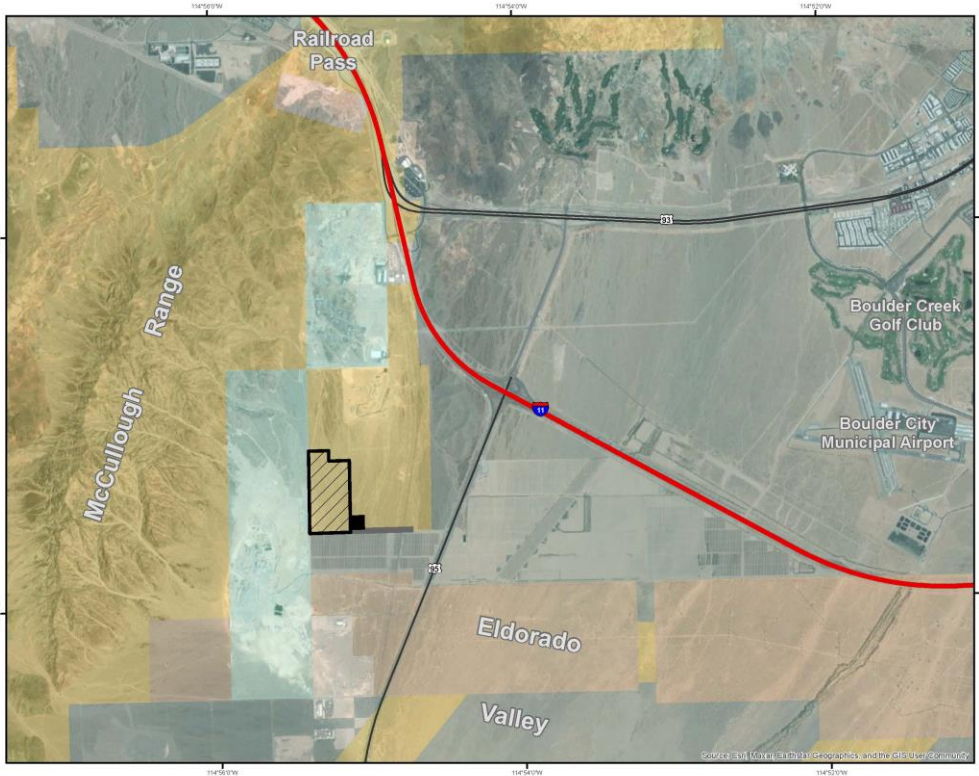
Townsite Solar 2
(NVN-99875)

-  Townsite Solar 2 (proposed)
-  laydown area
-  gen-tie ROW
-  BLM
-  USBR
-  DOE
-  State of Nevada
-  local govt
-  private land

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




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U.S. Long Grid, UTM Zone 11, NAD 1983
Digital Elevation Service
Prepared By: SNO/ES/SMF on 6/19/2022
No warranty is made by the BLM as to the accuracy, reliability, or completeness of these data or individual use of appropriate use with other data.



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Southern Nevada
District Office**

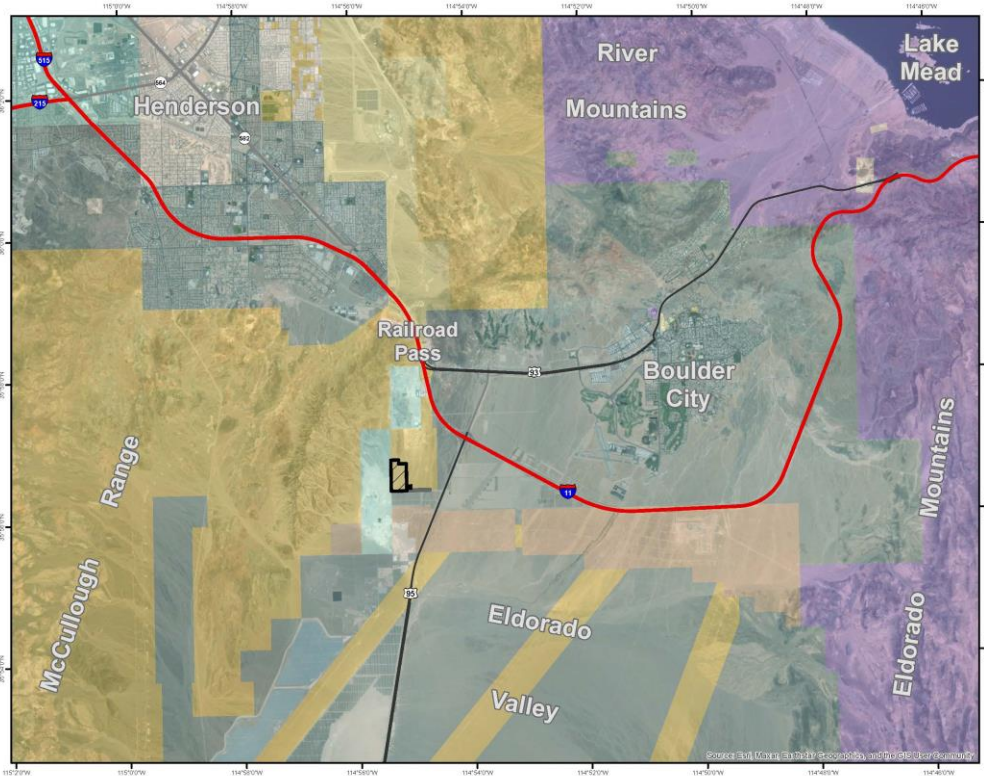
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In Reply Refer To:
N-99875
2800 (NVS0100)

SEP 17 2021

CERTIFIED MAIL

DECISION

Skyler Energy Resources LLC : Right-of-Way N-99875
5847 San Felipe St., Ste. 4450 : Townsite Phase II Solar Project
Houston, TX 770573 :

Priority Determination

On June 8, 2020, the Bureau of Land Management (BLM) received an application for the Townsite Phase II Solar Project on public lands. The application was subsequently amended on July 14, 2021. The application has been assigned the case number N-99875. Please refer to this number for all future correspondence relating to this case.

The BLM has reviewed and prioritized your application in accordance with the screening criteria in 43 CFR § 2804.35 and has determined your application to be a High priority. The rationale for the priority determination of your application is provided for in the enclosed Priority Determination Worksheet. The BLM may re-categorize your application based on new information received through surveys, public meetings, or other data collection, or after any changes to the application.

The BLM may require you to submit additional information necessary to process the application. This information may include a detailed construction, operation, rehabilitation, and environmental protection plan (i.e., a Plan of Development), and any needed cultural resource surveys or inventories for threatened or endangered species. If the BLM needs more information, the BLM will identify this information in a written deficiency notice asking you to provide the additional information within a specified period of time. For solar energy development projects, you must commence any required resource surveys or inventories within one year of the request date, unless otherwise specified by the BLM.

INTERIOR REGION 8 • LOWER COLORADO BASIN

ARIZONA, CALIFORNIA*, NEVADA*

* PARTIAL

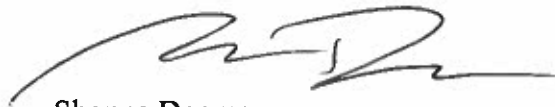
This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4 and the enclosed Form 1842-1. If an appeal is taken, your notice of appeal must be filed in this office (at the above address) within 30 days from receipt of this decision. The appellant has the burden of showing that the decision appealed from is in error.

If you wish to file a petition (request) pursuant to regulation 43 CFR 2801.10 or 2881.10 for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate Office of the Solicitor (see 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.



Shonna Dooman
Field Manager
Las Vegas Field Office

Enclosure

Project Priority Determination Worksheet

Project Name: Townsite Phase II
BLM Serial Number: N-99875 (Updated Application 6/2021)

Date: September 15, 2021

Purpose: The purpose of this worksheet is to identify landscape level constraints for Solar and Wind project proposals in the Bureau of Land Management (BLM) Southern Nevada District Office (SNDO) and to prioritize the solar or wind proposal based on known resource conflicts.

This worksheet is divided into four sections. These sections evaluate each proposed solar or wind project submitted to the Southern Nevada District Office (SNDO). The sections in this worksheet are as follows:

- Section 1 identifies the prioritization of projects based on regulations (43 CFR §2804.35).
- Section 2 are local (SNDO) considerations.
- Section 3 identifies specific resources issues.
- Section 4 identifies the priority decision.

Section 1 – Regulation Compliance

The regulatory compliance criteria below come from 43 CFR §2804.35. When completing the following form, if something is marked present or further clarification is needed please note it in the table at the end of Section 2 or if resource specific within Section 3 notes.

Low-Priority Criteria ¹		Present	Not Present
1)	Lands near or adjacent to lands designated by Congress, the President, or the Secretary for the protection of sensitive viewsheds, resources, and values (e.g., units of the National Park System, Fish and Wildlife Service Refuge System, some National Forest System units, and the BLM National Landscape Conservation System), which may be adversely affected by development.	X	
2)	Lands near or adjacent to Wild, Scenic, and Recreational Rivers and river segments determined suitable for Wild or Scenic River status, if project development may have significant adverse effects on sensitive viewsheds, resources, and values.		X
3)	Designated critical habitat for federally threatened or endangered species, if project development may result in the destruction or adverse modification of that critical habitat.		X
4)	Lands currently designated as Visual Resource Management Class I or Class II.		X
5)	Right-of-way exclusion areas.		X (see note)

¹ Lands currently designated as no surface occupancy for oil and gas development in BLM land use plans was removed from the low-priority criteria. This removal is due to the vagueness in the Las Vegas 1998 RMP.

Medium-Priority Criteria:		Present	Not Present
6)	BLM special management areas that provide for limited development, including recreation sites and facilities.		
7)	Areas where a project may adversely affect conservation lands, including lands with wilderness characteristics that have been identified in an updated wilderness characteristics inventory.		X
8)	Right-of-way avoidance areas.	X	
9)	Areas where project development may adversely affect resources and properties listed nationally such as the National Register of Historic Places, National Natural Landmarks, or National Historic Landmarks.	X	
10)	Sensitive habitat areas, including important species use areas, riparian areas, or areas of importance for Federal or State sensitive species.		X
11)	Lands currently designated as Visual Resource Management Class III.	X	
12)	Department of Defense operating areas with land use or operational mission conflicts.		X
13)	Projects with proposed groundwater uses within groundwater basins that have been allocated by State water resource agencies.	X	

High-Priority Criteria:		Present	Not Present
14)	Lands specifically identified as appropriate for solar or wind energy development, other than designated leasing areas.		X
15)	Previously disturbed sites or areas adjacent to previously disturbed or developed sites.	X	
16)	Lands currently designated as Visual Resource Management Class IV.		X
17)	Lands identified as suitable for disposal in BLM land use plans.		X

Section 2 – Local Considerations

The following considerations are specific to the Southern Nevada District. The selection of “present” for any of the local considerations can change the project priority. These local considerations take into account, but are not limited to, the following secretarial orders, policy, regulation, and laws, and BLM priorities.

- 43 CFR §2804.35
- Approved Resource Management Plan Amendments/Record of Decision for Solar Energy Development in Six Southwestern Statesⁱ
- 1998 Las Vegas Resource Management Planⁱⁱ
- Department of the Interior Prioritiesⁱⁱⁱ
- Bureau of Land Management Leadership Priorities^{iv}
- United States Fish and Wildlife Species List^v
- Nevada State Species List^{vi}
- BLM Sensitive Species List^{vii}

Local Considerations		Present	Not Present
18)	Development is located in the Southern Nevada Public Land Management Area (SNPLMA) Boundary		X
19)	Development is located near the proposed Southern Nevada Supplemental Airport		X

20)	There is a Solar Energy Zone or Designated Leasing Area within the district that could be used.	X	
21)	Development is located in areas where project development may adversely affect lands acquired for conservation (e.g., SNPLMA Environmentally Sensitive Land Acquisitions such as the Perkins Ranch acquisition near the Moapa, Nevada).		X
22)	The proposed project supports economies of local Tribes		X
23)	The proposed project supports the economy of Nye County		X
24)	Development is located within an area identified for disposal		X
25)	Development is located within a utility corridor		X
26)	Development is located within lands withdrawn from ROW authorizations		X
27)	Development is located within lands segregated from ROW authorizations.		X
28)	Development is located over another Solar or Wind Application		X
29)	Development may not be compatible with an existing grant, easement, lease, license, or permit.	X	
30)	Development is located outside of BLM jurisdiction		X
31)	Development is located on private lands		X
32)	Development is located in a USFWS least cost desert tortoise corridor.	X	
33)	Development is located in or adjacent to desert tortoise translocation areas		X
34)	Development is located over existing or active mining claims or community pit	X	
35)	Development is located over or within 1000 meters of natural surface water, springs, riparian areas or wetlands		X
36)	Development is located within a hydrogeographic basin where groundwater withdrawal could potentially impact groundwater dependent natural resources.		X
37)	Development is located over lands containing sensitive soil resources.		X

When completing Sections 1 and 2, if something is marked present or further clarification is needed please include here. Please place the number in the first column that corresponds to the number in Sections 1 and 2. If the presence or clarification is resource specific provide the justification or clarification in Section 3.

Clarifications/Justifications	
1, 9	The project is near an alignment of the Old Spanish National Historic Trail, the action would need to comply with BLM Manual 6280. The segment is not considered to be a high potential route segment and the setting of the trail in this area is substantially modified (including the presence of mining operations, the presence of major highways adjacent to the trail alignment, and current and planned solar facilities nearby. Sloan Canyon NCA is located approximately ~3.5 miles west of the project area. Given the distance and the topography of the area, no impacts are expected.
5	Portions of the project are within the area designated as exclusion for 5% or greater slopes in the Solar PEIS (NW1/4NW1/4SW1/4). The project sponsor has submitted additional information that shows that the affected lands do not have the 5% or greater slope. Subject to verification by the BLM, the identified exclusion is assumed to not be present on the affected lands. The prioritization could be modified at a later date, if the verification identifies the presence of the 5% or greater slope and thus the exclusion.
15	The application area is adjacent to a previously disturbed mineral site, N-96925, and has roads, pipelines, and underground utilities that run within the application area legal description.

29	Within the W1/2 of section 14 is the BLM Henderson Community pit, case file N-48712. There are also pending realty cases within the application legal description that may conflict with this proposed use.
32	The project area is considered low density tortoise habitat but considered an area of high valued habitat connectivity corridor as well as a tortoise genetic connectivity corridor. However, the project site is located in an area where connectivity could not be maintained north of the location because of mountain ranges, highways and Boulder City.
34	Application area is entirely within an existing SNDO community pit, case file N-48712. The proposed area does not interfere with the identified pending cases.

Section 3 – Resource Considerations

This section identifies the proposed projects resources conflicts. This section is to be completed by BLM resource specialists using existing data and knowledge of the area. The resource conflicts identified in this section can change the priority of the project.

Desert Tortoise	
<i>Considerations:</i>	
<ul style="list-style-type: none"> • Based on vegetation, soil type, and/or previous surveys, whether the project is proposed in areas expected to occur in low, medium or high density tortoise habitat. • Whether the project is proposed in relatively undisturbed habitat. • Whether the project is located in a tortoise genetic connectivity corridor (least cost tortoise corridor) • The availability of an area to translocate desert tortoise within the same recovery unit from the proposed project site. 	
<i>Description of Issues:</i>	
<p>The project is located in a Priority 1 area for Desert Tortoise connectivity as defined by the Solar PEIS. The project area is considered low density tortoise habitat, but considered an area of high value habitat connectivity corridor as well as a tortoise genetic connectivity corridor. However, the project site is located in an area where connectivity could not be maintained north of the location because of mountain ranges, highways and Boulder City. The area is undisturbed, but surrounded by disturbance in the form of mineral pits and major roadways. The project is located in Eastern Mojave Recovery Unit as described by the USFWS Desert Tortoise Recovery Plan. Tortoises from this site would be able to be translocated within the same recovery unit. An appropriate translocation site would need to be determined.</p>	
Other Federally Listed, State Listed, and BLM Sensitive Species Constraints	
<i>Considerations:</i>	
<ul style="list-style-type: none"> • Whether there are other Federally Listed, State Listed, and BLM Sensitive Species expected to occur at the site or have the potential to be directly or indirectly affected by the proposed project. 	
<i>Description of Issues:</i> None.	

Botany

Considerations:

- Whether the project will occur in or adjacent to habitat for any sensitive or state or federally listed species or Clark County MSHCP protected plant species.
- Whether the project occurs in major portion (>10% of any population group) of habitat for BLM sensitive plant species or MSHCP protected plant species
- Whether the project occurs in any habitat for federally endangered plant species OR Project occurs in habitat (> 5% of any population group) for state endangered plant species.

Description of Issues:

The project does **not** occur in any known habitat for any sensitive or state/federally listed species or Clark County MSHCP protected plant species.

The project does **not** occur in any major portion of habitat for BLM sensitive plant species or MSHCP protected plant species.

The project does **not** occur in any habitat for federally endangered or state endangered plant species.

Weed Constraints

Considerations:

- Whether there are non-native and/or noxious weed species present or adjacent to the project area.
- Whether the project activity is likely to result in the establishment of noxious/invasive weed species.
- Whether the spread of non-native and/or noxious weed species would result in impacts to the surrounding areas and whether that would have impacts to important areas such as Critical Habitat Units, ACECs, sensitive plant habitat, NCA's, National Monuments, etc.

Description of Issues:

Noxious weeds, primarily Sahara mustard, likely occur in and adjacent to the project area given the proximity of the project area to the 95 S corridor.

The project will likely lead to the establishment of additional noxious and invasive species.

The project is north of the Piute-Eldorado ACEC; however, the project area is surrounded by other disturbances, including the 95 S highway, mining, etc., and so the addition of this project would not likely increase the threat of invasive weed proliferation beyond what is already present in the immediate area.

Cultural and Native American

Considerations:

- Whether there are isolated documented sites and sites within 1000 meters of the project area.
- Whether there are ineligible archaeological sites and possible Native American cultural or religious sites, including high potential areas like river terraces or springs.
- Whether there are eligible archaeological resources that require treatment and known Native American Cultural or religious sites.
- Whether there are significant eligible intact sites and undisturbed human burials.

Description of Issues:

There is no cultural resource survey of the project area. A cultural resource survey will need to be completed for the project (Class III) to determine effect and cultural resource site not documented. There have been a total of 8 documented ineligible historic sites within 1,000 meters of the project area.

A NCRIMS Sensitivity Analysis was conducted for the project area and the immediate surroundings. According to this analysis this area has a low to moderate potential for significant cultural resources to be present within the project area. The report for the analysis done for this project is located in the supporting documentation for this Prioritization.

NOTE: The National Cultural Resources Information Management System (NCRIMS) web-based application was designed to enable BLM users to conduct landscape-level suitability analyses for planning purposes using the Cultural Heritage Resource Sensitivity Model (CHRSM). The CHRSM utilizes predictive modeling to incorporate expert knowledge and environmental or evidentiary data for identifying areas of cultural resources to inform management decisions that support protection. The summary report provides information about the project area, including existing inventory information, documented cultural resources, suitability modeling criteria, weighting information, and modeled outputs for the analysis area. NCRIMS is a planning tool to help inform early analyses for NEPA and Section 106 of the National Historic Preservation Act allowing planners, decision makers and proponents to adjust projects prior to more complete NEPA and Section 106 investigations.

The Old Spanish National Historic Trail is near the project area. If there are eligible cultural sites along the Trail, indirect visual effects to the sites from the development of solar would need to be analyzed through the Section 106 process under the National Historic Preservation Act. Impacts to the Congressionally designated Trail would be analyzed under the BLM Manual 6280.

Recreation

Considerations:

- The level of casual use recreation.
- Types and numbers of special recreation permits in the area.
- Whether the proposed project area occurs within a Special Recreation Management Area identified in a Land Use Plan that is managed specifically for recreation opportunities.
- The proposed project area occurs within a Special Recreation Management Area identified in a Land Use Plan that is managed specifically for recreation opportunities, and has developed recreation facilities (trailheads, kiosks, staging areas), in addition to having special recreation permitted activities.

Description of Issues:

There are no known casual recreation uses occurring in the area. The LVFO has not issued any Special Recreation Permits for events or commercial activities in this area.

The project area is in the Nelson Hills / Eldorado Special Recreation Management Area (SRMA). There are no developed recreation facilities or opportunities in this portion of the SRMA.

Range / Grazing
<p><i>Considerations</i></p> <ul style="list-style-type: none"> • Whether the project area is located in any active grazing allotment. • Whether the development of the solar facility make grazing impossible within the active allotment (development of key forage areas or key water sites). • Whether the project is in an allotment where Clark County has purchased the grazing preference to protect desert tortoise under the MSHCP (Arrow Canyon, Arrow Canyon in Battleship Wash, Beacon, Bunkerville, Crescent Peak, Christmas Tree Pass, Gold Butte, Hen Springs, Ireteba Peaks, Jean Lake, McCullough Mountain, Mesa Cliff, Roach Lake, Table Mountain, Toquop Sheep, Upper Mormon Mesa, White Basin).
<p><i>Description of Issues:</i></p> <p>The project area is not in an active grazing allotment.</p> <p>The project development would not impact an active grazing allotment (see above).</p> <p>The project is within the McCullough Mountain allotment, the grazing rights to which have been purchased by Clark County to protect desert tortoise under the MSHCP. However, given multiple physical barriers (the 95 and materials pits/mining) surrounding the parcel where this project is proposed, tortoise habitat may not be impacted by the proposed project. Evaluation of this as a metric for prioritizing the project should reference the desert tortoise section of this document.</p>

Section 4 - Priority Decision

Priority Decision	
Based on the BLM screening criteria found in 43 CFR 2804.35, and additional resource considerations, the project priority category has been determined to be:	High

Justification:

Although the project meets both low and medium priority criteria, by factoring in BLM's evaluation of local considerations with regard to those low and medium priority criteria, and in consideration of adjustments to the project proposal made by the applicant, a project priority category of high is appropriate.

The Townsite Phase II solar project consists of approximately 80 acres of public lands, would generate 20MW of solar power, and would be utilized to charge Battery Energy Storage System (BESS) planned to be located on Townsite Phase I Solar project located on lands leased from the City of Boulder City (adjunct to the southern border of the proposed project). Additionally, the project would utilize shared facilities with the Townsite Phase I Solar project (on leased lands), including the substation and transmission infrastructure. The project is proposed on lands adjacent to a previously disturbed site, to lands planned for mineral material development, and lands leased from the City of Boulder City for solar energy development.

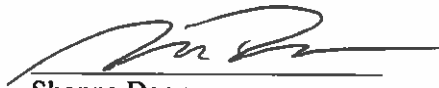
The project is located in an area where desert tortoise connectivity would not be able to be maintained due to the presence of other land uses in the area (i.e. mining, highway, solar planned on adjacent City lands), though the project is technically located in lands that have been identified as Priority 1 Desert Tortoise

Area identified within the Solar PEIS and would require some additional review as part of the Variance Process.

The Old Spanish National Historic Trail segment in the vicinity of the project is not considered to be a high potential route segment and the setting of the trail in this area is already substantially modified by the presence of mining operations, major highways adjacent to the trail alignment, and current and planned solar facilities nearby.

Because the existing landscape character has been modified over time by mining operations, major highways, transmission lines, and solar energy development, the BLM would consider an amendment to the existing VRM class within the proposed project area to class IV if needed.

The project sponsor has significantly reduced the size of the project so that sufficient lands remains in the community pit to allow for anticipated future mineral material needs to support community development into the future, though the project is proposed within a mineral materials community pit.



Shonna Dooman
Field Manager
Las Vegas Field Office

9/17/2021
Date

Concurrence Non-Concurrence



Angelita S. Bullets
District Manager
Southern Nevada District

9/17/2021
Date

ⁱ BLM. 2012a. "Approved Resource Management Plan Amendments/Record of Decision for Solar Energy Development in Six Southwestern States." October.

ⁱⁱ BLM. 1998. "Record of Decision for the Approved Las Vegas Resource Management Plan and Final Environmental Impact Statement." October.

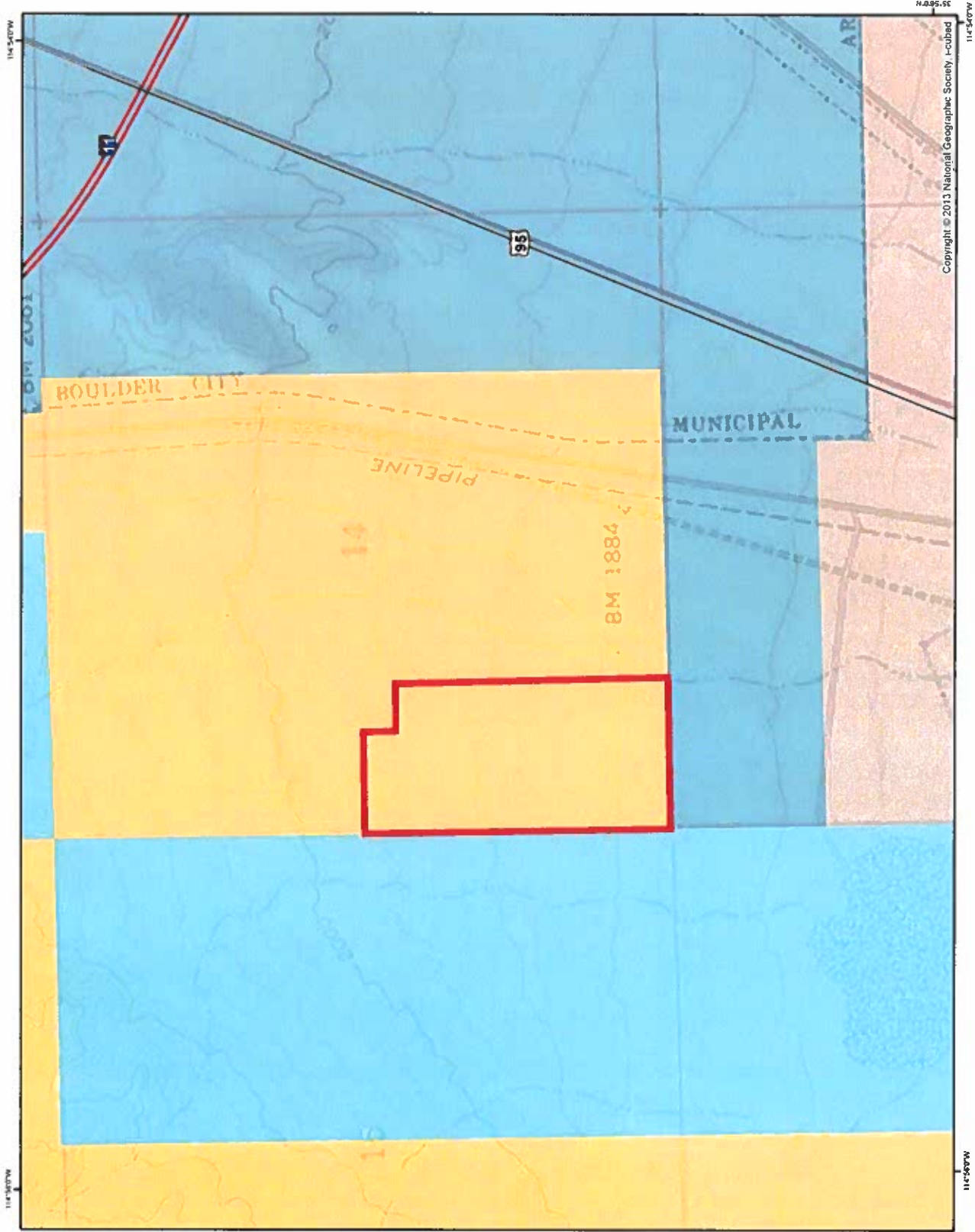
ⁱⁱⁱ <https://www.doi.gov/ourpriorities>

^{iv} <https://blmspace.blm.doi.net/wo/600/commtools/SitePages/Leadership%20Priorities.aspx>

^v <https://ecos.fws.gov/ecp0/reports/species-listed-by-state-report?state=Nv&status=listed>

^{vi} <http://heritage.nv.gov/species/process.php>

^{vii} <https://www.blm.gov/policy/nv-im-2018-003>



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114°50'00"W


114°50'00"W

BLM
Southern Nevada
District Office


Townsite Phase II
Solar Project

Project Prioritization

Proposed Project Area

-  Townsite Phil Solar
-  Bureau of Land Management
-  Department of Energy
-  Nevada State
-  Local Government

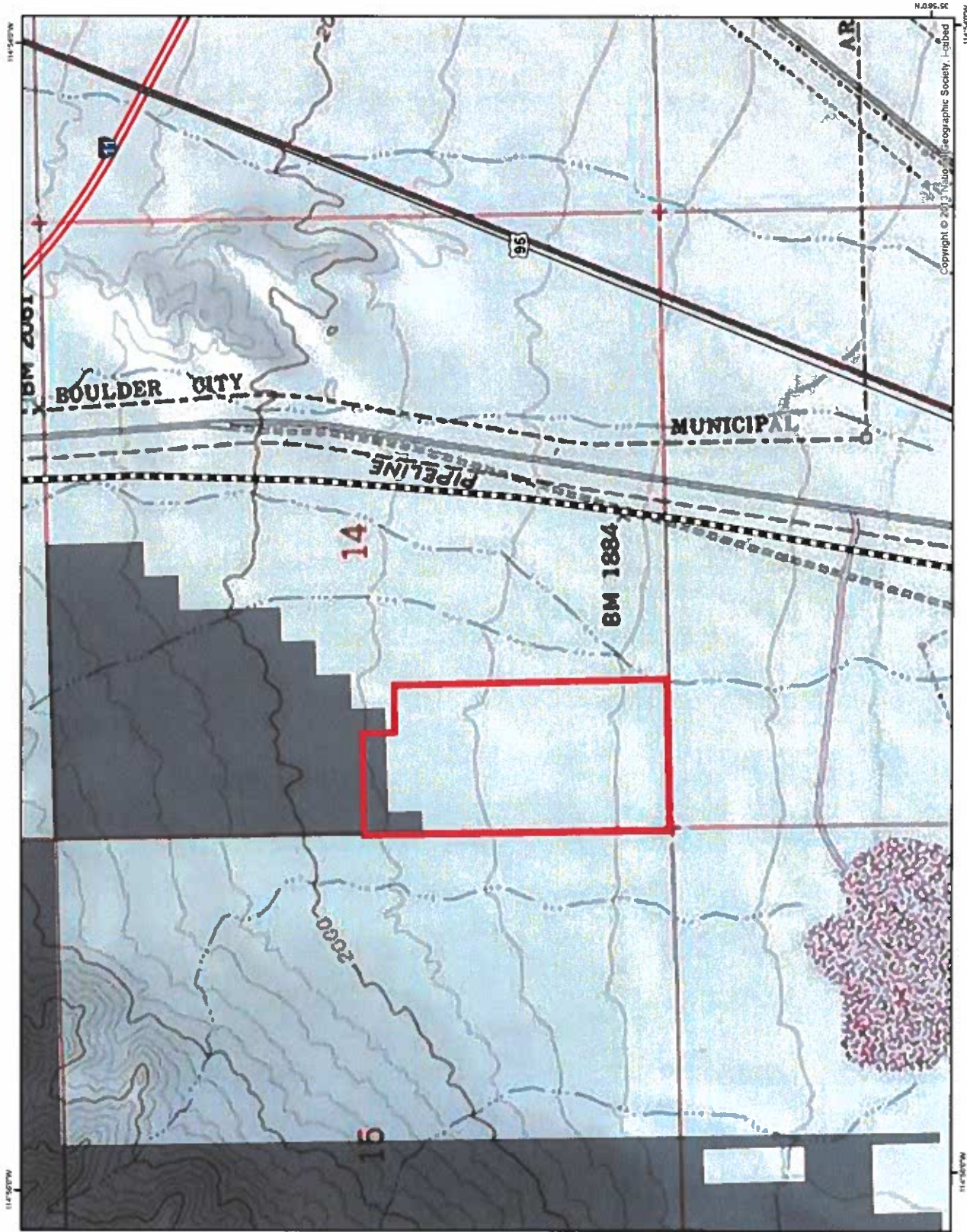
0 500 1,000 2,000
Feet



Let Long One - UTM Zone 11 1940 1983
Degrees Minutes Seconds

Prepared By: SHDO E&I Staff on 6/10/2011

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District Office

Townsite Phase II
Solar Project

Project Prioritization


Low Priority Criteria

 **Townsite Phill Solar**

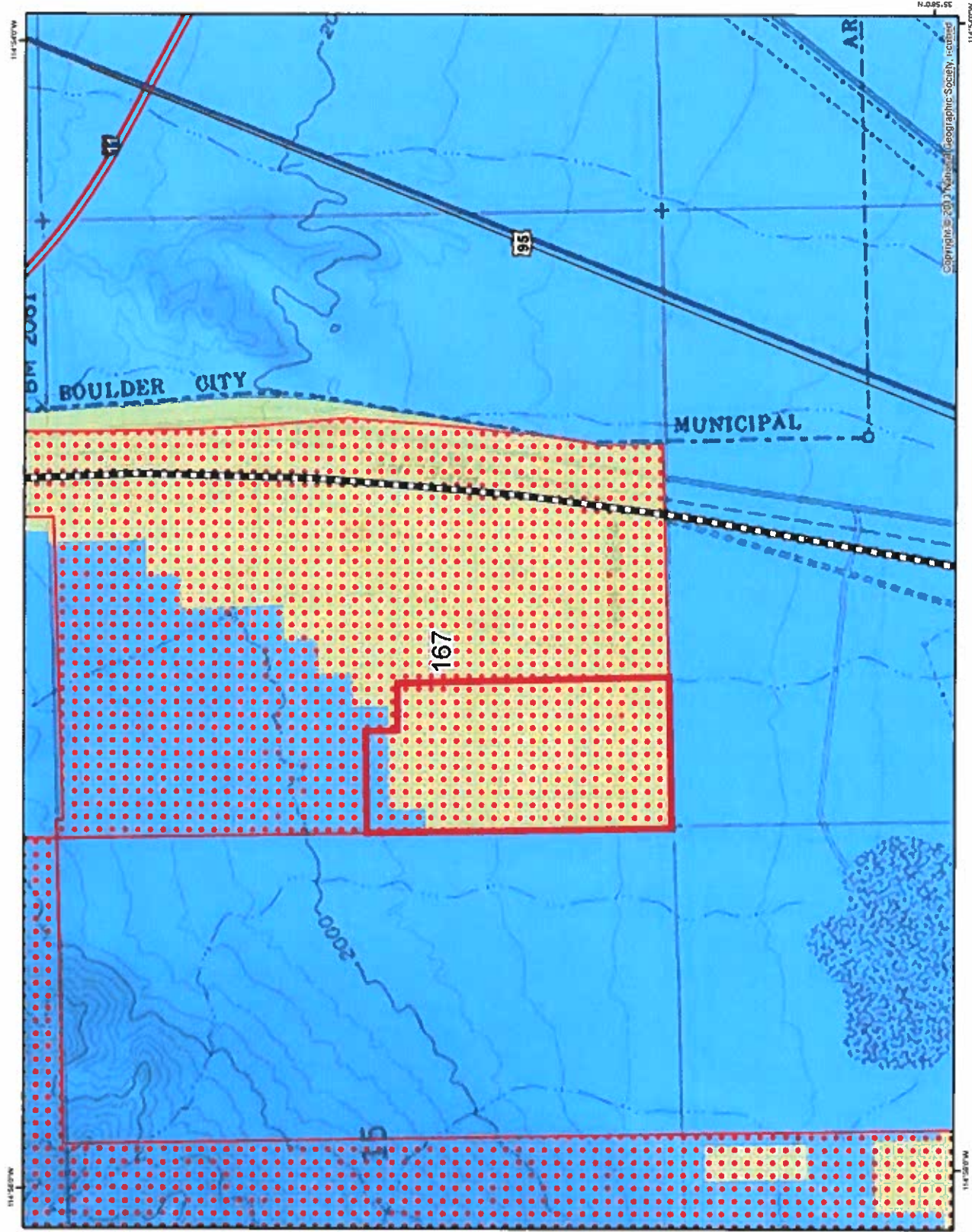
 **Old Spanish Trail NHT**

 **Solar Exclusion Areas**

0 500 1,000 2,000
 Feet

N

 S

U.S. Geological Survey
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Townsite Phase II Solar Project

Project Prioritization

Medium Priority Criteria

 Townsite Phil Solar

 Old Spanish Trail NHT

 VRM Class 3

 Solar Variance Areas


 Groundwater Basin 167



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Townsite Phase II
Solar Project
Project Prioritization
High Priority Criteria

 **Townsite Phill Solar**

Previously disturbed mineral
site is visible in aerial imagery.

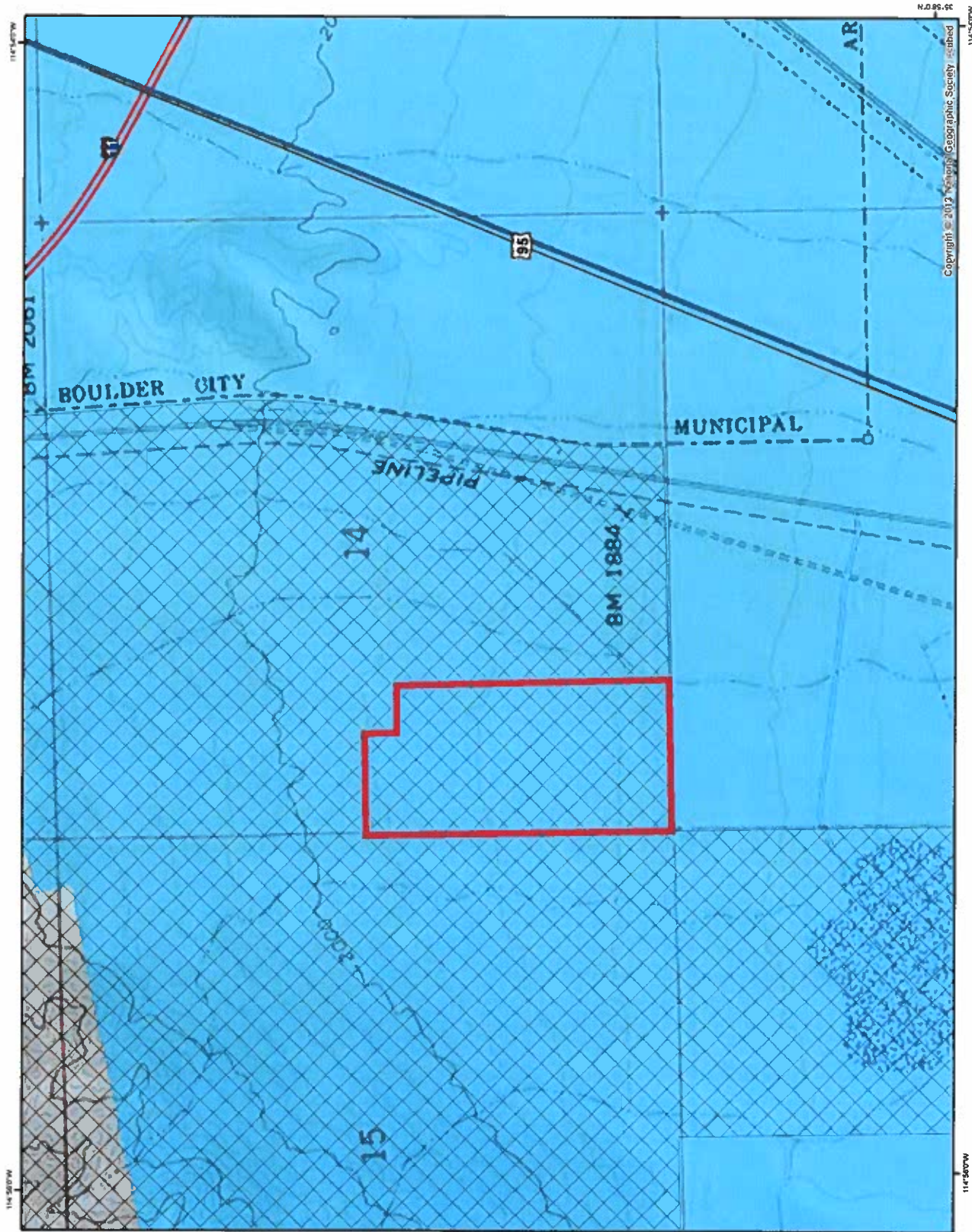


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District Office

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Southern Nevada
District Office


Townsite Phase II
Solar Project

Project Prioritization

Local Considerations

-  Townsite Phill Solar
-  Desert Tortoise Least Cost Corridor
-  SNDO Community Pit

0 500 1,000 2,000
Feet



USGS Data, 1:250,000 Scale, 11, 14, 16, 1983
Deposited Material, License

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