



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
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In Reply Refer To:
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Memorandum

To: Director, Bureau of Land Management

From: Jon K. Raby
State Director, Nevada

Subject: Concurrence Request to Initiate the National Environmental Policy Act Process for the Rough Hat Clark County Solar Project Application Variance Proposal

The Bureau of Land Management's (BLM) 2012 Western Solar Plan designated 285,000 acres of solar energy zones as highly suitable locations for siting solar energy development. In addition, 19.3 million acres of public land were allocated as variance areas where applications for solar development may be allowable on a case-by-case basis, subject to preliminary evaluation and coordination requirements by the applicant prior investing substantial agency resources through environmental review under the National Environmental Policy Act (NEPA). The Rough Hat Clark County Solar Project (Project) has been evaluated in accordance with the variance process requirements under Appendix B.5 of the Western Solar Plan, and my determination, subject to your concurrence, is to initiate environmental review for the project under NEPA. Relevant project information and findings from the variance evaluation are summarized below.

On November 14, 2019, the BLM Las Vegas Field Office received the right-of-way application and variance proposal from Candela Renewables, LLC for the Project located in Clark County, Nevada. The proposed 400-megawatt photovoltaic solar project would encompass approximately 2,400 acres of public land and would include a battery energy storage system. Candela Renewables, LLC estimates the Project would support a workforce of up to 400 workers over the 12- to 18-month construction timeframe. Additionally, 10 full-time workers would support the Project's operations for 30 years. A summary of the variance review and coordination is provided below.

The BLM sent letters to the Moapa Band of Paiutes, Las Vegas Paiute Tribe, Timbisha Shoshone, Chemehuevi Indian Tribe, Twenty-Nine Palms Band of Mission Indians, Fort Mojave Indian Tribe, and Colorado River Indian Tribes on March 31, 2021, to assess initial interest on the Project and invite the tribes to initiate formal government-to-government consultation. The Project was presented at government-to-government consultation meetings and field visits were conducted. The BLM emailed the Tribes on November 30, 2021, to invite them to an interagency meeting on December 2, 2021, 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.

Stakeholder engagement efforts by the BLM identified that the Project has the potential for some resource conflicts and citizens of the Pahrump Valley generally oppose solar development in the area. 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.

Virtual public information forums held for the Project were held December 8 and 9, 2021, and had 25 attendees and 30 attendees, respectively. The public input period for the project was from November 15 to December 22, 2021. From public comments and input received, there was a generalized tone of opposition to solar projects within the Pahrump Valley area. More detailed comments from the public related to concern for wildlife and vegetation resources within the project area, potential impacts to recreation opportunities and use, proximity to Pahrump, impacts to health from dust/air quality changes, water resources and use, and climate change.

On December 2, 2021, the Southern Nevada District conducted an Agency meeting with Federal, State, local, and Tribal governments for the Pahrump Valley solar projects, including the Project, and the Agency input period concluded on December 17, 2021. Early Agency coordination yielded concerns related to water resource impacts, desert tortoise habitat/connectivity, potential effects to wildlife and vegetation species, climate change, and recreation use.

Through the variance process evaluation, no conflicts were identified with a magnitude such that they would be unable to be resolved, negotiated, or mitigated. As such, it is my determination that it is appropriate to initiate the NEPA environmental review process for the Project. Proceeding with the environmental review of this project utilizes the flexibility within the 2012 Western Solar Plan to site projects in areas other than Solar Energy Zones in appropriate circumstances and supports the national goal of siting 25,000 megawatts of renewable energy by 2025.

In accordance with guidance included in the Solar Programmatic Environmental Impact Statement Record of Decision, concurrence of the BLM Director with a State Director's determination that an application is appropriate for continued processing is required for a variance application for solar development to be fully processed. Concurrence will not approve the proposed project; rather, it would allow for the initiation of the formal environmental review process, including public scoping and the preparation of an environmental impact statement. Through this process, the potential impacts from the development of the proposal can be analyzed. This analysis would serve as the basis for any decision to approve or deny a project.

I request your concurrence on my determination to proceed with initiating the environmental review process under NEPA for the Rough Hat Clark County Solar Project application.

I concur

I do not concur

Tracy Stone-
Manning

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Tracy Stone-Manning
Director, Bureau of Land Management

Date