



***Bureau of Land Management
Director's Protest Resolution Report***

**GridLiance West Core Upgrades
Transmission Line Project Final
Environmental Impact Statement
and Proposed Resource
Management Plan Amendment**

May 7, 2026

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Acronyms

Term	Definition
ACEC	Area of Critical Environmental Concern
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
FEIS	Final Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
PRMPA	Proposed Resource Management Plan Amendment
RMP	Resource Management Plan

Introduction

The Bureau of Land Management (BLM) Southern Nevada District Office released the Final Environmental Impact Statement (FEIS) and Proposed Resource Management Plan Amendment (PRMPA) for the GridLiance West Core Upgrades Transmission Line Project on February 27, 2026. The GridLiance FEIS/PRMPA considers both implementation-level decisions and land use planning decisions. Only the proposed land use planning decisions under consideration are subject to protest. The BLM received two unique protest letter submissions during the subsequent 31-day protest period, which ended on March 30, 2026. At the time the BLM issues a decision to authorize implementation-level action of the proposed actions analyzed in the GridLiance FEIS/PRMPA, any party to a case adversely affected by that decision may appeal the implementation-level decision to the Interior Board of Land Appeals.

The planning regulations at 43 Code of Federal Regulations (CFR) 1610.5-2 outline the requirements for filing a valid protest on proposed land use planning decisions. The BLM received two protest letters from three protesting parties. The BLM evaluated all submissions to determine which protest letters were complete and timely, and which parties have standing to protest. Both letters were timely but only two protesting parties had standing to protest; therefore, one letter was dismissed due to the protesting party's lack of standing as shown in the *Protesting Party Index*, below. The other letter contained valid protest issues. The BLM has documented the responses to the valid protest issues and recorded the protest decision in writing along with the reasons for the decision in this protest resolution report. No changes to the GridLiance FEIS/PRMPA have been identified as necessary to address the valid protest issues received.

The BLM's Assistant Director for Resources and Planning addressed the protest letters received, issued this protest resolution report to protesting parties, and posted the report on the BLM's website. The decision was sent to the protesting parties by certified mail, return receipt requested. Consistent with the BLM Delegation of Authority Manual (MS-1203, *Delegation of Authority*), resolution of protests is delegated to the BLM Assistant Director for Resources and Planning, whose decision on the protest is the final decision of the U.S. Department of the Interior (43 CFR 1610.5-2(b)).

Protesting Party Index

Letter Number	Protestor	Organization	Determination
PP-NV-GL-EIS-26-01	Dorene Medlin	--	Dismissed: No Standing
PP-NV-GL-EIS-26-02	Kevin Emmerich	Basin and Range Watch	Denied
	Laura Cunningham	Western Watersheds Project	

Deferral of ACEC Consideration

Basin and Range Watch and Western Watersheds Project

Kevin Emmerich and Laura Cunningham

Issue Excerpt Text: In September, 2022, Basin and Range Watch and Western Watersheds Project submitted a nomination for a 58,000-acre Cactus Springs Area of Critical Environmental Concern (ACEC) to be considered as an alternative to four proposed solar projects emphasizing the Bonanza Solar Project to protect crucial Mojave desert tortoise connectivity habitat.

The Federal Land Policy and Management Act (FLPMA) requires the Bureau of Land management (BLM) to prioritize designating and protecting ACECs that contain these resources or hazards. ACECs are proposed and evaluated through land use planning using the best available information and extensive public involvement, so you have a say in how they are managed. ... The BLM could also decide to initiate a land use plan amendment in order to consider designating a proposed ACEC. ... A Resource Management Plan (RMP) revision or plan amendment could also allow BLM to designate the region surrounding the GridLiance Core Upgrade Project the Cactus Springs Area of Critical Environmental Concern.

Summary:

Protestors alleged the BLM violated FLPMA in the GridLiance FEIS/PRMPA by unlawfully deferring an ACEC nomination to a separate a planning process, despite FLPMA's direction to prioritize identifying, designating, and protecting ACECs through land use planning, including RMP amendments.

Response:

The BLM is required to consider the identification, evaluation, and priority for management of ACECs during RMP amendments when the consideration of ACECs for designation is within the scope of the amendment (43 CFR 1610.7-2(b)). When an ACEC nomination is received outside of a planning process or during an RMP amendment for which the consideration of ACECs for designation are not within the scope of the amendment, the BLM may defer evaluating the nomination to an upcoming planning process (43 CFR 1610.7-2(i)(2)).

The BLM disclosed the purpose and need for the proposed action as responding to the FLPMA right-of-way amendment application submitted by GridLiance, which is described in detail in Section 1.2 of the GridLiance FEIS/PRMPA (p. 1-3). Consideration of ACECs, whether modifications to existing or new nominations, are not within the scope of this narrow amendment.

In the GridLiance FEIS/PRMPA, the BLM has acted consistent with its regulations that guide the consideration of ACEC nominations received outside of a planning effort where ACECs are not within the scope of the plan amendment and, consistent with those regulations, deferred evaluating ACEC nominations. Accordingly, this protest issue is denied.