

APPENDIX A-5

Analysis to Support an Amendment to the Las Vegas Field Office Resource Management Plan

Introduction

The Bureau of Land Management (BLM) Las Vegas Field Office is considering amending the Las Vegas Resource Management Plan (BLM, 1998), to allow the use of public land for the Proposed Silver State South Project near Primm in Clark County, Nevada. Silver State Solar Power South, LLC, a wholly owned subsidiary of First Solar, Inc., is proposing to develop a 350 megawatt (MW) alternating current (AC) (nominal plant capacity)¹ solar photovoltaic (PV) generating facility referred to as the Silver State Solar South Project. The proposed solar facility was previously analyzed as Phases II and III in the Silver State Solar Energy Project Final Environmental Impact Statement (EIS) (BLM 2010). The Final EIS analyzed the development of a 400MW_{AC} project to be constructed in phases. Phase I, which became the Silver State Solar North Project and is currently operational, consisted of the construction, operation, maintenance, and ultimate decommissioning of a 50MW_{AC} solar plant and associated facilities. Phases II and III, which are the subject of the Supplemental EIS, consisted of the construction, operation, maintenance, and decommissioning of the remaining 350-MW_{AC} project to complete the 400MW_{AC} solar project.

Visual Resource Management System

The Federal Land Policy and Management Act requires that the BLM consider the scenic values of public land as a resource that merits management and preservation, as determined through the land use planning process. In response to this mandate, the BLM developed the Visual Resource Management (VRM) System, with the primary objective of managing public land in a manner that will protect the quality of scenic (visual) values (Information Bulletin No. 98-135). The VRM System provides guidance relating to the Visual Resource Inventory process that the BLM implements to inventory scenic values (BLM Handbook 8410-1), as well as assess the potential effects of proposed actions based on the analysis of visual contrast (BLM Handbook 8431-1). Handbook 8410-1 also provides guidance regarding VRM classes, which set management objectives for BLM-administered land.

Primary factors considered for the inventory of scenic values are scenic quality, sensitivity level rating units, and distance zones (DZ), collectively referred to as the "VRI". These three factors are combined to develop Visual Resource Inventory (VRI) classes, which represent the scenic values of BLM managed land. The management of inventoried scenic values is evaluated during the land use planning process and VRM classes (I-IV) are assigned to all BLM administered

¹ Nominal plant capacity refers to generation and delivery of power under ideal conditions. The capacity of any solar energy facility is dependent on many factors and changes over a course of a day, a season, or year regardless of the technology, geographic location, or design. The nominal capacity of 350 MW_{AC} is understood to mean the peak power-generating capacity of the facility expressed in watts minus all auxiliary, internal (parasitic) loads. In this document, MW_{AC} is used synonymously with MW.

land. The assignment of VRM classes is based on the consideration of: (1) inventoried scenic values (i.e., the VRI and VRI classes), (2) other land use and resource allocations within a given field office or management unit, and (3) public needs and national priorities for federal land. VRM assignments are land use plan decisions that guide future land management actions. It is important to note that VRM class assignments do not have to be consistent with inventoried scenic values (i.e., VRI classes) and should reflect a balance between the protection of visual values and other uses of BLM land to meet public demand or national priorities. Compliance with assigned VRM classes is determined by conducting contrast ratings, as described below.

Contrast Ratings

Per BLM VRM policy, an assessment of visual contrast, or the level of change to the characteristic landscape, is required for all environmental assessment or environmental impact statement NEPA documents for all proposed projects on BLM administered land. Key observation points (KOP) are selected during the NEPA process for a given project. Visual contrasts are assessed and documented from each KOP using BLM Worksheet 8400-4 – Visual Contrast Rating Worksheet.

With regard to Silver State South, an assessment of contrast from two of the KOPs indicated that the Project would not comply with the VRM class designation where the Project is proposed. Specifically, visual contrast would be strong to moderate/strong from the Lucy Gray OHV Trail and the Lookout by the Communications Tower and therefore the Project, as proposed, would not comply with the objective for VRM Class III, which is: *"To partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate."* See Chapter 4 of the SEIS for a detailed description of the contrast assessment and Appendix X-4 for the simulations that illustrate a contrast which exceeds a moderate level of change to the characteristic landscape.

Therefore, the Las Vegas Field Office (FO) is considering an amendment to the RMP, as described in the proposed action below, to consider an option that would allow for permitting of Silver State South, if approved.

Proposed Action

The Federal (BLM) Proposed Action is to change the current VRM class designation from Class III to Class IV. The management objective for Class IV designated land is *to provide for management activities which require major modifications of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements* (VRM H-8410-1). If the Proposed Action is implemented, the proposed Silver State South Project would comply with VRM Class IV objectives (thus the Las Vegas RMP) and the BLM could grant the right-of-way necessary to construct and operate the Project.

Per direction of the BLM WO and in response to high priority energy projects, two alternatives for the plan amendment will be evaluated for the Silver State Project. The geographical extent of the plan amendment study area is based on lands within the Ivanpah Valley near Primm, Nevada.

This study area is generally defined by the McCullough Mountains to the east, Clark and Spring Mountains to the West, the town of Jean to the north, and SR 164 to the south. Two options, including a No Action option, were developed by the BLM within the plan amendment study area. The Footprint-only option comprise VRM Class IV designations for lands within the project footprint. The No Action option retains the current VRM classifications within the plan amendment study area. The Footprint-only option would result in a change to the Las Vegas Field Office land use plan that would allow construction and operation of the Silver State South Project in regard to VRM.

Existing Conditions

The plan amendment study area is located within the Ivanpah Valley, which is generally defined by the Lucy Gray and McCullough Mountains to the east and the Clark and Spring Mountains to the west (see SEIS Chapter 3.12.1).

Visual Resource Inventory

As previously described, the VRI comprises three primary components: scenic quality, sensitivity level rating units, and DZs, per BLM VRM policy. These three factors are combined using a geographic information system to define VRI classes, which represent the scenic values of BLM-managed land. The following descriptions of the VRI are based on information provided by the Las Vegas Field Office. Figures provided in Chapter 3 illustrate each component of the VRI data.

Scenic Quality

Scenic quality is a measure of the aesthetic value of a given landscape and is based on the following seven landscape factors: landform, vegetation, water, color, adjacent scenery, scarcity, and cultural modifications. Based on the diversity of landscape factors, the VRM System classifies landscapes as either A, B, or C class landscapes.

Ivanpah Valley is associated with Class C scenery (Unit Number 22) and is characterized as a broad flat valley with three dry lake features. The surrounding mountain ranges (Lucy Grey and McCullough Mountains) create an enclosed landscape setting.

Sensitivity Levels

Sensitivity levels are a measure of public concern for the maintenance of scenic quality. Public lands are assigned high, medium, or low sensitivity by analyzing the various factors of public concern, including type of user, amount of use, public interest, adjacent land uses, special areas, and other factors that indicate sensitivity.

The majority of the lands within the study area are associated with low sensitivity (Unit Number 61). Moderate sensitivity lands are associated with I-15 (Unit Number 24) which is a major transportation corridor between California and Las Vegas.

Distance Zones

Per BLM guidance, landscapes are subdivided into three DZs, based on relative visibility from travel routes or other public viewing locations. The three zones are foreground-midground, background, and seldom seen. The foreground-midground zone includes areas seen from highways, rivers, or other viewing locations that are less than 3 to 5 miles away. Areas viewed beyond the foreground-midground zone, but usually less than 15 miles away, are in the background zone. Areas not seen as foreground-midground or background (i.e., hidden from view) are in the seldom seen zone.

The study area is associated with the foreground-midground distance zone. Visual Resource Inventory Classes

VRI classes represent the scenic values of the landscape based on scenic quality, sensitivity, and DZs. VRI classes range from Class I to Class IV. Lands that have a Class I designation have high scenic value, whereas Class IV designated lands have a lower scenic value. It is important to note that VRI classes reflect inventoried visual conditions. VRM classes, also I–IV, reflect how the BLM chooses to manage land based on resource concerns beyond visual.

The study area is associated with VRI Class IV lands. Other Resources Considered for the Plan Amendment

The following resources were considered as part of the plan amendment assessment and potential development options.

- Resources, including biological, cultural, and recreation resources that may be affected by VRM Classifications
- BLM Special Recreation Management Area (SRMA) / Citizens Proposed Area of Critical Environmental Concern (ACEC) designations that may be affected by VRM Classifications
- Existing Utility Corridors and Other Land Uses – Existing utilities occurring within the Ivanpah Valley area and adjacent to the Proposed Project.
- Federal Renewable Energy Policy – Secretarial Order 3285A1, signed on March 11, 2009 and amended on February 22, 2010, established the development of renewable energy as a priority of the Department of the Interior. For other mandates related to renewable energy development see section See Section 1.4.2 of the Draft Environmental Impact Statement.

Options Description

The following section provides descriptions of the two options considered for the plan amendment, including a No Action option.

RMP Option 1: Proposed Plan Amendment for Project footprint

RMP Option 1 consists of changing lands within the project footprint area that are managed as VRM Class III to VRM Class IV. This option responds to the Federal Renewable Energy Policy and also maintains the most acreage of VRM Class III within the study area. The Project would conform to VRM objectives of the Las Vegas RMP. The Las Vegas FO has 1,867,657 acres of VRM Class III and 678,055 acres of VRM Class IV designated. Approximately 3,091 acres of VRM Class III land would be changed to VRM Class IV (0.16% of VRM Class III within the Las Vegas FO would be affected by this option).

RMP Option 2: No Action

RMP Option 3 is the No Action option. Under this option, the RMP would not be amended and current VRM Class III designations would remain within the plan amendment study area. As a result, no ROW would be issued for the Silver State South Project, because the Project would not be in conformance with the VRM objectives of the Las Vegas RMP.