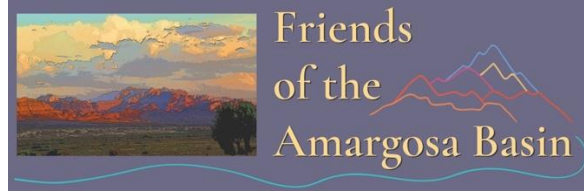




CONSERVING
DESERT TORTOISES
AND THEIR HABITATS



*Great Basin
Resource Watch*



FRIENDS OF
AVI KWA AME
NATIONAL MONUMENT



August 13, 2024

To:

Theresa Coleman,
District Manager
Southern Nevada District Office
Bureau of Land Management

Jon Raby
Nevada State Director
Bureau of Land Management

Nada Culver
Deputy Director
Bureau of Land Management

Tracy Stone-Manning
Director
Bureau of Land Management

Re: Support Letter for the South Pahrump Valley/ Old Spanish National Historic Trail Area of Critical Environmental Concern Nomination

The undersigned wish to support the [South Pahrump Valley/ Old Spanish National Historic Trail Area of Critical Environmental Concern Nomination](#)

This petition nominates public lands in the South Pahrump Valley, Nevada, for status as an Area of Critical Environmental Concern (ACEC). These lands are primarily located in Clark and Nye counties, Nevada, and the nomination is approximately 145,000 acres in extent. This nomination describes the significant environmental resources and values of these lands, and the need for special management attention. The area highlighted in this nomination contains a significant portion of the Old Spanish National Historic Trail and an ACEC that would contain a ten-mile-wide (five miles on either side of the trail) planning corridor to help protect the historic landscape of the trail. The ACEC would also protect the cultural landscape segments of the Cultural Landscape around the Spring Mountains important to Southern Paiute and Shoshone peoples, including a portion of the Salt Song Trail. This could open an opportunity to advance Tribal co-stewardship or traditional and customary uses.

The area also supports a functioning and reproducing Mojave desert tortoise population. A high-water table supports an important mesquite woodlands and habitat for neotropical migrant bird species. Much of the region provides habitat for the Pahrump buckwheat (*Eriogonum bifurcatum*), a rare plant in Nevada. Mammoth fossils and other paleontological resources have been discovered in the area. Much of the nominated area also supports a healthy population of Joshua trees (*Yucca brevifolia*). This nomination does not propose to close any roads or change existing land uses, except that the ACEC designation would prioritize resource protection over resource loss to solar development, which seems unrestricted in the Pahrump Valley.

The area has very low disturbance compared to other Mojave Desert regions but is singled out for solar energy development because there is an established energy corridor and a large substation in the area. The Yellow Pine Solar Project is now under

construction in the area, and we have seen several negative impacts from just this one project including visual, biological/desert tortoise, air quality, invasive weeds and groundwater use. There are five other solar project proposals in the area as well as a plan to upgrade existing transmission infrastructure. In total, an additional 18,000 acres could be impacted.

We would like to request that the BLM consider this nomination as a Conservation Alternative to the solar energy proposals in the area.

Thank you,

Ed Larue
Desert Tortoise Council

Cameron Mayer
Executive Director
Friends of the Amargosa Basin

Chris Clarke
Executive Director
Desert Advocacy Media Network

John Hadder
Executive Director
Great Basin Resource Watch

Stacy Goss
Desert Survivors

Paula Garrett
Board Member
Friends of Avi Kwa Ame National Monument

Mandi Elliott
Nevada Outdoor Business Coalition
Executive Director

Mason Voehl
Executive Director
Amargosa Conservancy