



ANTELOPE VALLEY CONSERVANCY
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"Biological integrity, fiscal accountability, and community transparency"

September 29, 2024

BLM Director

Attention: Protest Coordinator (HQ210)

Denver Federal Center, Bldg. 40

Lakewood, CO 80215

via US mail and email to protest@blm.gov

RE: Protest Period for Updated Western Solar Plan

To Whom It May Concern,

The Antelope Valley Conservancy would like to protest the Western Solar Plan due to its potential impacts to Mojave desert tortoise (*Gopherus agassizii*) habitat.

Antelope Valley Conservancy has preserved habitat for threatened and endangered species, including Mojave desert tortoise, since 2005 by implementing mitigation for government project permits and by obtaining grants and contributions to purchase land. AVC has earned Authorization to Hold Mitigation Lands by the State of California Department of Fish & Wildlife since 2008. Though California Mojave desert tortoise habitat was excluded from this plan, Antelope Valley Conservancy cannot remain silent while habitat for this threatened species is being cleared for disturbance and destruction elsewhere.

With the Updated Western Solar Plan, the Bureau of Land Management is making 31 million acres of public lands eligible for solar energy project applications. These lands include Mojave desert tortoise habitat, despite the fact that Mojave desert tortoises remain a threatened species under the Federal Endangered Species Act. While the Western Solar Plan excludes moderate amounts of critical Mojave desert tortoise habitat in southern Nevada, it has allowed exceptions for other lands containing desert tortoise habitat. Some of these lands coincide with previously planned solar development projects. These include over 14,000 acres allocated for Bonanza Solar, Rough Hat Clark County Solar, Copper Rays Solar, Purple Sage Energy Center, and the Dry Lake East Energy Center projects in Nevada.

Mojave desert tortoise populations are in decline throughout their range, including southern Nevada. Development of over 14,000 acres of habitat for this threatened species is detrimental to connectivity in the region, and may hasten the decline of local desert tortoise populations.

By Resolution of the
Board of Directors of
ANTELOPE VALLEY CONSERVANCY

Attested by Wendy Schiff, Corporate Secretary