



# United States Department of the Interior



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## Memorandum

To: Crescent Peak Wind File (N94470)

Through: Project Manager, Energy & Infrastructure Team

From: Wildlife Biologist, Energy & Infrastructure Team *Cathy Zunge* 11/28/18

Subject: Impacts of the Crescent Peak Wind (CPW) Project to Wildlife

The Nevada Department of Wildlife (NDOW) provided comments during the scoping period regarding possible impacts to wildlife from the CPW project. NDOW's comments were carefully reviewed by BLM and an evaluation of their merit follows.

NDOW expressed concern that wildlife species, including game species, would likely avoid the CPW project when developed, impacting big game populations and reducing hunting opportunities to the public. NDOW stated that the Crescent Peak Mountains and North Castle Mountains provide an important linkage between population segments of desert bighorn sheep in southern Nevada and southern California. Population connectivity and gene flow in this region is maintained by bighorn sheep movements through the Crescent Peak Mountains, which connects the McCullough and Highland Ranges and the Lucy Grey Mountains in Nevada, to the New York, Providence, Granite, and Old Dad Mountains in California. Maintaining not only bighorn sheep habitat, but also the migration corridors between these mountain ranges, is essential to the long-term future of bighorn sheep in this region.

The BLM agrees with NDOW's concern. The movement of bighorn sheep across the landscape can be categorized into two general types. The first is daily movement where bighorn sheep move between watering, foraging, and resting areas. The second is seasonal movements, where bighorn sheep move to other parts of a range or to other mountain ranges in response to changes in vegetation quality, water availability, or weather. The impediment of either of these movements can be devastating to a bighorn sheep population. An additional concern of the proposed CPW project is the development of new roads and improvement of existing roads. Often, the development of roads brings an increase use of all-terrain vehicles (ATVs) and people into bighorn sheep habitat. Bighorn sheep avoid otherwise suitable habitat due to increased human activity. Bighorn sheep may also display an unknown level of avoidance to the wind turbines that could

effectively sever the population connectivity between bighorn sheep in these mountain ranges southern Nevada and southern California.

NDOW also expressed concern that wildlife, both large and small game species, would avoid springs, seeps, and guzzlers that were close to wind turbines.

The BLM agrees with NDOW's concern. Natural springs and water sources are uncommon in southern Nevada, and the proposed wind project is close to or surrounds a number of springs, wells, seeps, and guzzlers that provide water to a multitude of wildlife species, including bighorn sheep. Wildlife avoidance of these watering areas would likely result in reduced wildlife use and occupancy in and around the CPW project. Additionally, the development of roads and wind turbine bases may impact the hydrology of the area, further reducing water resources to wildlife.

Desert bighorn sheep are not the only species of conservation priority or species important to wildlife related recreation that occur within or adjacent to the proposed CPW project. Other species include desert tortoise, golden eagle, gila monster, gilded flicker, Scott's oriole, mule deer, Gambel's quail, chukar, mourning dove, desert cottontail, bobcat, gray fox, kit fox, mountain lion, pallid bat, Townsend's big-eared bat, spotted bat, silver-haired bat, California myotis, western small-footed bat, long-eared myotis, little brown myotis, fringed myotis, canyon bat, and Mexican free-tailed bat. All of these species could be impacted in unknown ways from the proposed development of the CPW project. Wind turbine mortality of bats and birds, particularly Golden Eagles, is well documented. There are 8 active Golden Eagle nests identified within the Crescent Peak Renewables project area and bat occupancy of the project area has been demonstrated through the bat study at CPW project area. Bat species present at the project area include species that are documented to be killed by wind turbines.

The Fish, Wildlife, and Special Status Species management direction contained within the Las Vegas Resource Management Plan (RMP) and Record of Decision specifically outlines four management directions, which the Crescent Peak Renewables wind project would be inconsistent with. Those management directions include:

- FW-1-a. Maintain and improve bighorn sheep habitat by maintaining existing water developments, constructing additional water developments, and protecting/improving springs, seeps, and riparian habitat, consistent with BLM policy for management of wilderness study areas, in the following areas:
  - Arrow Canyon/Elbow Range
  - South Spring/Bird Spring Range
  - Gold Butte/Virgin Mountains
  - Muddy Mountains
  - Spring Range
  - Eldorado/Newberry Range
  - Specter Range/Last Chance Range/Bare Mountains
  - McCullough Range/Highland Range/**Crescent Peak**
- FW-1-b. Evaluate discretionary activities proposed in bighorn sheep habitat and on a case-by-case basis. Grant authorization if the proposed actions are consistent with the goals and

objectives of the *Rangewide Plan for Managing Desert Bighorn Sheep Habitat on Public Lands* and other applicable policies.

- FW-3-e. Protect artificial and natural waters that provide benefit to wildlife.
- FW-3-f. Protect key nesting areas and migration routes.

In summary, the BLM concurs with NDOW's concerns regarding impacts from the CPW project impacts to wildlife.