

# MBCA

## morongo basin conservation association

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[www.mbconservation.org](http://www.mbconservation.org)

May 10, 2023

BLM Las Vegas Field Office

Matthew Klein

[mklein@blm.gov](mailto:mklein@blm.gov)

Regarding: Golden Current Solar Project, DOI-BLM-NV-S010-2022-EIS, Preparation and Planning

Dear Mr. Klein,

Thank you for this opportunity to comment on the Golden Current Solar Project (GCSP). The Morongo Basin Conservation Association (MBCA) is a 501(c) 3, community-based all volunteer California Non-Profit Corporation. The placement of utility scale solar facilities on vast acreages of the California Desert's public lands has affected both the natural environment and the economic well-being of desert communities. We now accept the need to become regionally aware when the effects of projects cross state boundaries.

Because of the *Lake Effect* (See Attachment) It is probable that the placement of Golden Current Solar Project in the basin between Las Vegas and Pahrump will interfere with successful bird migration along the Pacific Flyway. In addition to Golden Current's 6.9 sq. miles of reflecting PV panels three other solar projects are located on adjacent lands:

Yellow Pine Solar 4.7 sq. mi. (under construction)

Copper Rays Solar 7.9 sq. mi. (pending)

Rough hat 3.75 sq. mi. (pending)

23.25 square miles over

Birds are attracted to the shininess of solar panels, which often look like water when they are flying above. Some birds mistake panels for bodies of water and try to dive into the "water," which hurts or kills them. Since panels are stowed face up the effect could also be present at night under moonlight and starlight.

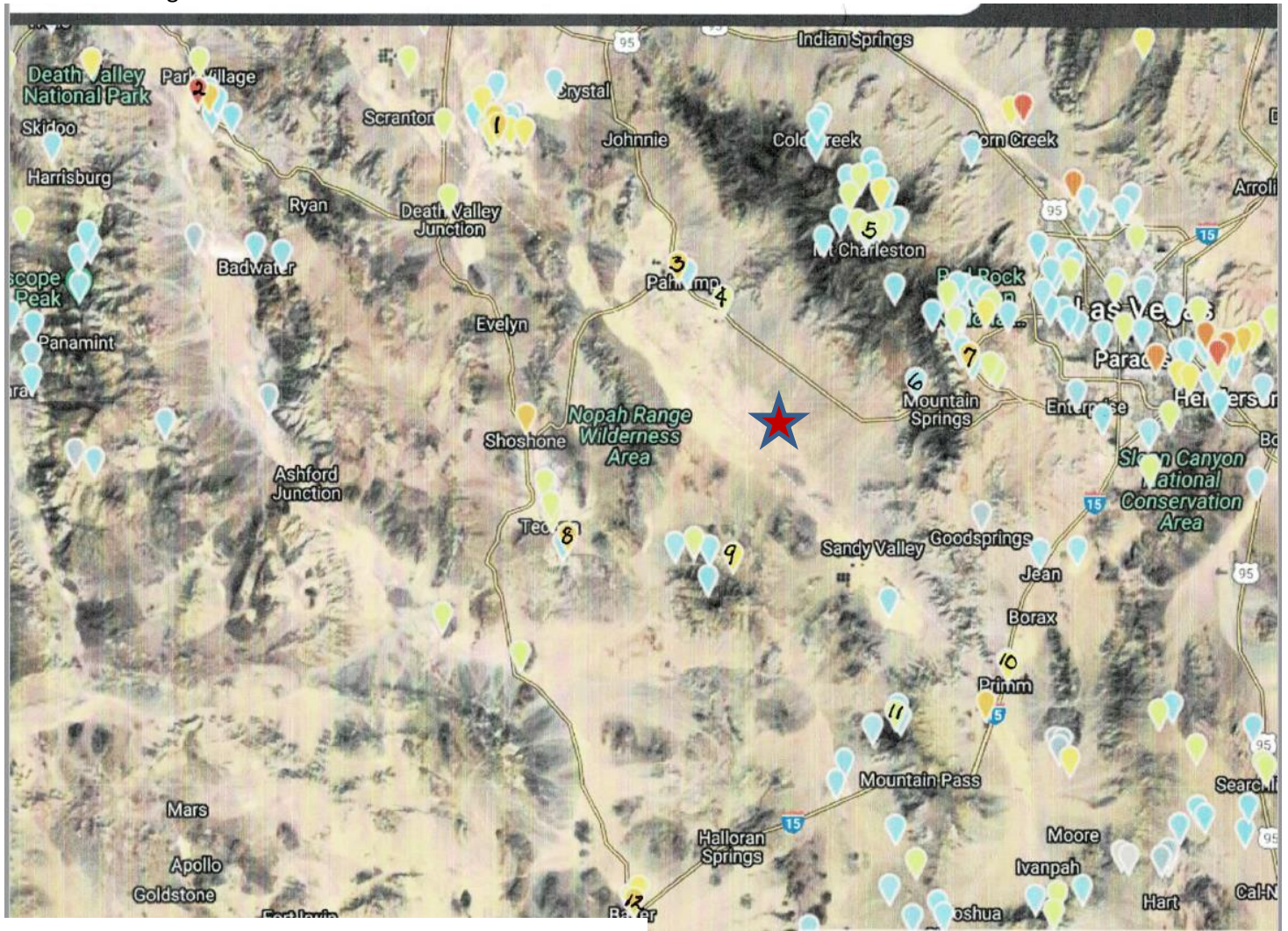
During discovery of the Project's environmental impacts bird presence will be studied so construction will not interfere with nesting. However thorough the bird survey is on site, the time frame is short and does not account for the future effect of the new bodies of water on tired and thirsty migrating birds. Birds are in trouble for many reasons including climate change and drought. Water suitable to land on is becoming scarce.

<https://www.audubon.org/news/north-america-has-lost-more-1-4-birds-last-50-years-new-study-says>

To supplement on-site surveys we recommend the use of Cornell Laboratory of Ornithology eBird website for year-round bird movement during migration to and from nesting and wintering locations.

<https://ebird.org/hotspots>

Figure 1 and Table 1 below demonstrate the usefulness of this analysis. It takes an army of bird watchers and monitors to get this data.



#	eBird Location on map #s retrieved 5/10/23	Year Round-All Species Counts	Checklists
1	Ash Meadows NWR – Crystal Res.	224	1347
2	Furnace Creek Ranch – DVNP	350	2702
3	Pahrump Discovery Park	206	1817
4	Mountain Falls Park – Pahrump	111	257
5	Spring Mtn. NPA Mt. Charleston	149	284
6	Spring Mtn. NRA Lower Lovell Canyon	78	47
7	Spring Mountain Ranch St. Pk.	230	1553
8	China Ranch Date Farm	206	564
9	Horse Thief Springs	154	352
10	Primm Valley Golf Club	215	220
11	Clark Mountain General	119	75
12	Baker Sewage Ponds	242	969

**Figure 1:** eBird Hotspot map with numbered locations around the proposed and pending PV solar projects (red star) located between Las Vegas and Pahrump.

**Table 1:** eBird hotspots (numbered) surrounding the proposed and pending solar projects locations.

As background for decision making, I have attached Smallwood, K.S. Utility -scale solar impacts to volant wildlife. 24 March 2022. The Journal of Wildlife Management 86, Issue 4

Sincerely,

A handwritten signature in black ink, appearing to read "Pat Flanagan". The script is cursive and fluid.

Pat Flanagan, Board  
Morongo Basin Conservation Association.  
[Patflanagan29@gmail.com](mailto:Patflanagan29@gmail.com)

Attached:

K. Shawn Smallwood. Utility-scale solar impacts to volant wildlife. 24 March 2022. The Journal of Wildlife Management Volume 86 Issue 4 open access