



July 20, 2023

Dear Mr. Buttazoni,

*Please select an alternative for the Bonanza Solar Project that denies the Right of Way for the solar project and establishes a Cactus Springs Area of Critical Environmental Concern.*

*The proposed project site is located in a part of the Mojave Desert that the Fish and Wildlife Service has called 'the most critical desert tortoise connectivity corridor in Southern Nevada'. This high value contiguous habitat maintains genetic and demographic connectivity between wilderness areas, national park lands, wildlife refuges and critical habitats. All desert tortoise connectivity in the Las Vegas Valley has been cut off by explosive urban growth.*

*The project would destroy an undisturbed site and remove habitat for multiple Mojave Desert species including desert kit fox, Parish's club cholla, Utah vine milkweed, kangaroo rats, long-nose leopard lizard, burrowing owl, western banded gecko, loggerhead shrike and a host of other species.*

*There are 63 cacti and yuccas per acre on the project site that would be developed. That means there are 157,500 cacti and Mojave yuccas on the site. Most would be removed and/or destroyed.*

*The project would create visual impacts for the Mt. Charleston Wilderness Area, the Mount Stirling Wilderness Area, the Desert National Wildlife Refuge, Cactus Springs and Cold Creek.*

*Construction of the project would destroy biological soil crusts and desert pavement. This will create fugitive dust issues for the communities of Cactus Springs and Indian Springs, Nevada,*

*Construction of the project could require up to 300 to 400 acre feet of water to control fugitive dust. If the project proponent uses local water, it could dry up the riparian springs at Cactus Springs. The region also sits on top of a Mega-channel that is part of the watershed that supplies Ash Meadows National Wildlife Refuge and Devil's Hole, home to the Devil's Hole Pupfish, one of the most endangered species in the world.*

*To preserve diverse Mojave Desert habitat on public lands, BLM should reject the application for the Bonanza Solar Project and establish the 58,000 acre Area of Critical Environmental Concern as an alternative and Plan Amendment to the Las Vegas Resource Management Plan.*

*At this point, there are over 20,000 acres of solar projects proposed for the region including Bonanza Solar which BLM is reviewing at this time. The ACEC would provide a long-term projection to diverse high desert species, unique wetlands and spectacular view-sheds. The desert tortoise is protected under the Endangered Species Act and has seen a range-wide decline of 37 percent. Now is the time to keep important identified habitat for the species undeveloped. Nevada contains some of the nation's most valuable public lands and the Cactus Springs ACEC presents a great opportunity to not only protect the desert tortoise, but also additional valuable resources in the area.*

*Thank you,*

A handwritten signature in black ink that reads "Steve Bardwell". The signature is written in a cursive, flowing style.

*Steve Bardwell, President  
Morongo Basin Conservation Association*

