Appendix C

Biological Resources Technical Report (Part I)

McCullough-Victorville Transmission Lines 1 and 2 Upgrade Project

Biological Resources Technical Report

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LIST OF ACRONYMS

ACEC	Area of Critical Environmental Concern
BLM	Bureau of Land Management
BRTR	Biological Resources Technical Report
CDFW	California Department of Fish and Wildlife
CDNCL	California Desert National Conservation Lands
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
CNPS	California Native Plant Society
CRPR	California Rare Plant Rank
CHU	Critical Habitat Unit
CMA	Conservation and Management Action
CNDDB	California Natural Diversity Database
DEIR	Draft Environmental Impact Report
DRECP	Desert Renewable Energy Conservation Plan
DWMA	Desert Wildlife Management Area
EIR	Environmental Impact Report
ESA	Endangered Species Act
FLPMA	Federal Land Policy and Management Act
FEIR	Final Environmental Impact Report
GPS	global positioning system
IBA	Important Bird Area
I	Interstate
IPaC	Information for Planning and Consultation
ITP	Incidental Take Permit
kV	kilovolt
LADWP	Los Angeles Department of Water and Power
LUPA	Land Use Plan Amendment
MCC-VIC	McCullough-Victorville transmission alignment
MCV1	McCullough–Victorville Transmission Line 1
MCV2	McCullough–Victorville Transmission Line 2
MGS	Mohave Ground Squirrel
MSHCP	Multiple Species Habitat Conservation Plan
NAC	Nevada Administrative Codes
NDOW	Nevada Department of Widlife
NDEP	Nevada Division of Environmental Protection
NDNH	Nevada Division of Natural Heritage
NEPA	National Environmental Protection Act
Project	McCullough-Victorville Transmission Lines 1 and 2 Upgrade Project
ROD	Record of Decision
ROW	Right of Way
SR	State Route
USACE	U.S. Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
WJT	Western Joshua Tree

Executive Summary

This Biological Resources Technical Report (BRTR) describes the biological resources that were documented or that have the potential to occur on the Los Angeles Department of Water and Power (LADWP) McCullough-Victorville Transmission Lines 1 and 2 Upgrade Project (Project). LADWP is the Lead Agency under the California Environmental Quality Act (CEQA) and BLM is the lead under the National Environmental Policy Act (NEPA). A Draft Environmental Impact Report (DEIR) was completed in June 2024. The Final EIR was completed September 2024 (SCH No. 2024040144) and the Notice of Determination (NOD) signed on October 22, 2024. LADWP is currently preparing a Supplemental EIR to reflect changes to the project design.

The McCullough-Victorville (MCC-VIC) Lines 1 and 2 are located within an existing LADWP utility right of way (ROW). The MCC-VIC transmission line corridor extends approximately 162 miles from the McCullough Substation located near Boulder City, in Clark County, Nevada, to the Victorville Switching Station, located in Victorville in San Bernardino County, California (Attachment A, Figure 1). The Nevada segment is approximately 24 miles long and runs from the McCullough Substation to Line 1 Tower 27-5 and Line 2 Tower 26-7. The California segment is approximately 138 miles long and runs from Line 1 Tower 27-6 and Line 2 Tower 27-1 to the Victorville Switching Station.

A variety of focused and protocol biological field surveys have been conducted along the ROW between April 2021 and June 2026. Initial surveys were conducted from April to June 2021 and April and May 2024. Based on revisions to the Project design supplemental surveys were conducted in 2025 which included botanical surveys, an inventory of western Joshua tree surveys, and surveys that focused on desert tortoise (*Gopherus agassizii*), desert kit fox (*Vulpes macrotis arsipus*), western burrowing owl (*Athene cunicularia hypugaea*), and American badger (*Taxidea taxus*). Incidental observations of avian and other wildlife and botanical species were also completed in 2025. Protocol level surveys for desert tortoise were conducted in 2026 in the Nevada Segment and in portions of the ROW in California that were not assessed during previous surveys. In addition, floristic botanical surveys were conducted across the entire ROW.

The surveys identified a broad variety of vegetation, sensitive plants, and wildlife. Several sensitive natural communities were observed in the Project Area including Acton's and Virgin River brittlebush - net-veined goldeneye scrub (S3 Vulnerable Ranking), Death Valley joint fir scrub (S3 Vulnerable Ranking), Fremont's smokebush – Nevada smokebush scrub (S3 Vulnerable Ranking), Nevada joint fir - Anderson's boxthorn - spiny hop sage scrub (S3Vulnerable Ranking), and Joshua tree woodland (S3 Vulnerable Ranking).

Two Federally or State Listed plants were observed during the surveys. These included:

- Blue diamond cholla (*Cylindropuntia multigeniculata*) is a Nevada listed Critically Endangered Plant and Bureau of Land Management (BLM)-designated Sensitive Plant. Blue diamond cholla was observed adjacent to Line 1 Tower 10-1.
- Western Joshua tree (*Yucca brevifolia*) a California State Candidate Species was observed in the ROW. The majority of the western Joshua trees occur south of Dale Evans Parkway to the Victorville Switching Station in Victorville, California. However, the range of western Joshua tree intersects with the Project Area from approximately Barstow Road to the western terminus of the ROW.

The following other special-status plant species were observed within the Project Area.

- Small-flowered androstephium (*Androstephium breviflorum*) CRPR 2B.2
- Mojave milkweed (*Asclepias nyctaginifolia*) BLM CA: S, CRPR 2B.1
- Clark Mountain agave (*Agave utahensis* var. *nevadensis*) BLM CA: S; CRPR 4.2

- Nevada onion (*Allium nevadense*) BLM CA: S, CRPR 2B.3
- Scaly cloak fern (*Astrolepis cochisensis ssp. cochisensis*) CRPR 2B.3
- Tidestrom's milkvetch (*Astragalus tidestromii*) CRPR 2B.2
- Black grama (*Bouteloua eriopoda*) CRPR 4.2
- Three-awned grama (*Bouteloua trifida*) CRPR 2B.3
- Purple-nerve cymopterus (*Cymopterus multinervatus*) CRPR 2B.2
- Harwood's eriastrum (*Eriastrum harwoodii*) BLM CA: S, CRPR 1B.2
- Clark Mountain buckwheat (*Eriogonum heermannii* var. *floccosum*) CRPR 4.3
- Desert pincushion (*Escobaria (=Coryphantha) chlorantha*) CRPR 2B.1
- Parish's club-cholla (*Grusonia parishii*) CRPR 2B.2
- Ashen forget me not (*Johnstonella costata*) CRPR 4.3
- Ribbed cryptantha (*Johnstonella costata*) CRPR 4.3
- Polished/ elegant blazing star (*Mentzelia polita*) BLM CA & NV: S, CRPR 1B.2
- Creamy blazing star (*Mentzelia tridentata*) BLM CA: S, CRPR 1B.3
- Utah mortonia (*Mortonia utahensis*) CRPR 4.3
- Crowned/pygmy muilla (*Muilla coronata*) CRPR 4.2
- Cave evening-primrose (*Oenothera cavernae*) BLM NV: S, CRPR 1B.3
- Cespitose evening-primrose (*Oenothera cespitosa* ssp. *crinita*) CRPR 4.2
- New York Mountains catseye (*Oreocarya (=Cryptantha*) *tumulosa*) CRPR 4.3
- White margined beardtongue (*Penstemon albomarginatus*) BLM CA & NV: S, CRPR 1B.1
- Rosy two-toned beardtongue (*Penstemon bicolor* ssp. *roseus*) BLM CA & NV: S, CRPR 1B.1
- Parish's phacelia (*Phacelia parishii*) BLM CA & NV: S, CRPR 1B.1
- Mojave fishhook cactus (*Sclerocactus polyancistrus*) NV: CY, CRPR 4.2
- Rusby's desert-mallow (*Sphaeralcea rusbyi* var. *eremicola*) BLM CA: S, CRPR 1B.2

The following State or federally listed, candidate, or fully protected species of wildlife were observed during surveys of the ROW. These included:

- Desert tortoise (*Gopherus agassizii*) is a Federally Endangered, California State Endangered, Nevada State Listed Threatened Reptile, and BLM Nevada and California designated Sensitive wildlife species.
- Western burrowing owl (*Athene cunicularia hypugaea*) is a Candidate for listing under California Endangered Species Act (CESA), U.S. Fish and Wildlife Service (USFWS) Bird of Conservation Concern (BCC), BLM California, and Nevada Sensitive Bird, CDFW Species of Special Concern (SSC), and Nevada Sensitive Bird.
- Gilded flicker (*Colaptes chrysoides*) is listed as endangered under CESA and is recognized as sensitive by BLM California and Nevada.
- Golden eagle (*Aquila chrysaetos*) is a State of California Fully Protected Bird.
- LeConte's thrasher (*Toxostoma lecontei*) is a Candidate for listing under CESA.
- Desert bighorn sheep (*Ovis canadensis nelsoni*) is a State of California Fully Protected Mammal §4700, with the exception as provided by subdivision (b) of Section 4902.
- Desert kit fox (*Vulpes macrotis arsipus*) are protected under the California Code of Regulations, Title 14, § 460.

Several other California, Nevada, or BLM special-status species were also observed during the surveys. These included:

- Common chuckwalla (*Sauromalus ater*)

- Great Basin collared lizard (*Crotaphytus bicinctores*)
- Mojave fringe-toed lizard (*Uma scoparia*)
- Brewer's sparrow (*Spizella breweri*)
- Loggerhead shrike (*Lanius ludovicianus*)

In addition to the species identified during the surveys, the Project Area has the potential to support a suite of other sensitive plants and wildlife. Each of these species is summarized below.

1.0 Introduction

1.1 Purpose of Assessment

This Biological Resources Technical Report (BRTR or Report) was prepared to characterize the biological resources that are present or have the potential to occur on or near the Project Area. The BRTR provides a description of the methods and results of biological resources surveys conducted during 2021, 2024, 2025, and 2026.

1.2 Project Location

The Project Area consists of an existing utility ROW and access roads located within the MCC-VIC Transmission Line 1 (MCV1) and Transmission Line 2 (MCV2) corridor which is maintained by LADWP (Attachment A, Figure 1). The utility corridor spans approximately 162 miles from the McCullough Switching Station in Boulder City in Clark County, Nevada to the Victorville Switching Station in Victorville, California in San Bernardino County, California.

The ROW is in the Eastern and Central portion of the Mojave Desert. The Project route crosses multiple bajadas, intermittent drainages, dry lakes, and mountains. The Nevada portion of the Project area is bordered by Boulder City to the northeast. The Project runs north of the South McCullough Wilderness in Nevada and crosses Interstate 15 near Primm, CA. In California, the utility corridor runs north of Ivanpah Valley and eastward until east of Yermo. From this location the ROW crosses I-15 and I-40 remaining near Barstow. South of this location the ROW crosses over the Mojave River terminating at Victorville Switching Station, in the City of Victorville.

1.3 Project Description

The MCC-VIC Lines 1 and 2 Project includes the removal and replacement of approximately 1,750 existing towers and their conductors. In addition, approximately 95 miles of the existing Line 1 alignment would shift southeast approximately 110 feet. Construction activities will include the demolition of existing structures and foundations, rehabilitation and maintenance of existing access roads, construction of new spur roads, establishing work areas and ancillary sites to support construction activities, and the erection of new transmission line towers.

Helicopters would be used to support construction of the foundations, new towers, and during wire stringing operations particularly where the terrain is steep or access is limited. Blasting or controlled detonations would also be used during the excavation of footings to loosen or fracture the rock. This is required in locations where bedrock or other granite material prevents use of conventional drilling machines. Blasting would be undertaken by qualified personnel and utilize focused controlled detonations that limit dust, noise, vibration, overpressure, and flyrock (Attachment A, Figure 2).

Prior to site mobilization and ground disturbance the boundaries of each work area would be delineated and all sensitive resources either flagged for avoidance or relocated off the site consistent with project mitigation measures or permit conditions.

1.4 Project Disturbance Area

The Project includes permanent and temporary impacts to land located along the MCC-VIC transmission line corridor. These include current tower locations, new tower locations, areas between the towers for activities such as wire pull sites, current main access roads, spur roads to individual towers, and maintenance yards. Permanent impacts include new and existing tower footprints and new access roads (e.g., new spur roads and existing access roads that require widening). Temporary impacts include wire pull sites, staging areas, guard structures, materials yards, and existing roads.

Table 1 summarizes the permanent and temporary impacts that would occur from the implementation of the proposed Project. Attachment A, Figure 3, illustrates the extent of temporary and permanent disturbance resulting from the proposed Project.

Table 1. Summary of Permanent and Temporary Impacts

Impact Type	California (acres)	Nevada (acres)	Total Impacts (acres)
Permanent	412.5	90.6	503.1
Temporary	4775.3	672.5	5447.8

2.0 Methodologies

This section provides a description of the methodologies used to identify biological resources that are known or have the potential to occur in the Survey Area. These include a review of existing online and published literature, coordination with resource and land management staff, and discussions with resource professionals. In addition, extensive field investigations have been conducted between 2021 and 2026 including vegetation mapping, floristic botanical surveys, focused and protocol wildlife surveys, and wildlife habitat assessments. For this report, the following area designations apply.

- **Project Area:** Refers to the area within the current MCC-VIC transmission Lines 1 and 2 alignments where existing and proposed tower locations, spur roads, and any area that may be subject to Project activities. The Project Area also includes all access roads that would be used for ingress/egress to the ROW, and staging or material yards that occur outside the ROW.
- **Survey Area:** Refers to the Project Area plus various species-specific survey buffers. Buffer distances range from 50 to 300 feet from the edge of Project Area. Larger two-mile buffers were utilized for golden eagle surveys.
- **Project Region:** Refers to the Project Area and a five-mile buffer. This area was used to establish a regional biological baseline during the literature review.

2.1 Agency Coordination and Consultation

LADWP has coordinated with CDFW, USFWS, BLM, and the Nevada Division of Natural Heritage (NDNH).

2.2 Literature and Database Review

The project spans 30 USGS 7.5’ topographic quadrangles. These include:

- Alvord Mtn. East
- Alvord Mtn. West
- Apple Valley North
- Barstow SE
- Bitter Spring
- Clark Mountain
- Cronese Lakes
- Daggett
- Desert
- Dunn
- East Of Kingston Spring
- Harvard Hill
- Ivanpah Lake
- Kingston Spring
- McCullough Mountain NE
- McCullough Pass
- Minneola
- North Of Baker
- Pachalka Spring
- Red Pass Lake
- Roach
- Silurian Valley
- Sloan SE
- State Line Pass
- Stoddard Well
- Turquoise Mountain
- Turtle Valley
- Victorville
- West Of Baker
- Yermo

In addition, 28 USGS 7.5' topographic quadrangles occur within a five-mile buffer of the Project Area. These include:

- Adelanto
- Baker
- Boulder City SW
- Cave Mountain
- Coyote Lake
- East Of Langford Well
- Fairview Valley
- Halloran Springs
- Helendale
- Hesperia
- Hidden Valley West
- Hodge
- Jean
- Keyhole Canyon
- Manix
- McCullough Mountain
- Mesquite Lake
- Mesquite Mountains
- Nebo
- Newberry Springs
- Ord Mountain
- Red Pass Lake NE
- Silurian Hills
- Solomons Knob
- Valley Wells
- West Of Red Pass Lake
- West Of Soda Lake
- West Ord Mountain

An initial review of species and critical habitat proposed or listed under the Endangered Species Act (ESA), Bald and Golden Eagle Protection Act (BGEPA), and migratory birds were determined using the USFWS Information and Planning Consultation (IPaC) (Attachment B). The California Natural Diversity Database (CNDDB) query results are listed in Attachment C. Each of the U.S. Geological Survey (USGS) topographic map areas were queried for a list of sensitive plants and wildlife. In addition, potential occurrence data for special-status species and policies relating to these sensitive resources were gathered from several other sources including but not limited to:

- Information for Planning and Consultation (IPaC) (USFWS, 2025)
- BLM NV Special Status Species List (BLM, 2023),
- BLM CA Special Status in CA, Including BLM Designated Sensitive Species (BLM, 2019),
- BLM CA Plant Special Status Species List (BLM, 2023),
- California Natural Diversity Database (CNDDB, CDFW 2021a),
- State and Federally Listed Endangered Threatened, and Rare Plants of California (CDFW, 2025a),
- Special Animals List (CDFW, 2026a, 2026b),
- California Wildlife Habitat Relationships (CDFW, 2021d),
- California List of Natural Communities (CDFW, 2024),
- Inventory of Rare and Endangered Vascular Plants of California (CNPS, 2021 and 2026),
- Consortium of Herbaria (CCH, 2021 and 2025),
- Calflora Information on California plants web application (Calflora, 2026)
- Nevada At-Risk Plant and Animal Track List (NDNH, 2025b and c),
- Desert Renewable Energy Conservation Plan (DRECP) (BLM, 2016)
- eBird citizen-based observation network (eBird, 2024, 2026)

- iNaturalist citizen-based observations (iNaturalist, 2024, 2026)
- Aerial photographs of the Project site and surrounding areas (October 2020, April 2020, February 2020, May 2018, July 2016, and August 2014).

2.3 Pre-Field Training

Prior to the initiation of the biological surveys each of the botanists and wildlife biologists was informed of the special-status species known to or expected to occur in the Study Area. To ensure data was collected uniformly each data collector was trained in the use of the tablet and global positioning system (GPS) units (the Arrow 100 GPS or Eos Skadi unit and an iPad with Environmental Systems Research Institute [ESRI] Field Maps) and the data collection methods. In addition, field staff were provided with a safety briefing and instructed on communication protocols. As data was collected in the field, the information was collated and Quality Assessment/ Quality Control (QA/QC) reviews were performed.

2.4 Field Surveys and Habitat Assessments

Aspen conducted a series of biological resource surveys and inventories on the ROW between 2021 and 2026 (Table 2 Summary of Biological Field Surveys Conducted to Date). Protocol surveys for desert tortoise were conducted in 2026 in the Nevada segment of the ROW and in portions of California where new disturbance areas have been identified. Golden eagle surveys were also conducted. Floristic botanical surveys were completed in California and Nevada in 2026. In addition, an updated inventory of western Joshus trees was conducted. Surveys of sensitive birds, desert kit fox, western burrowing owls, and other species remain ongoing during the summer of 2026.

Table 2. Summary of Biological Field Surveys Conducted to Date

Date	Area Surveyed	Type of Survey
April -June 2021	Each tower with a 120-foot buffer. 100 percent survey coverage. Access and spur roads with 10-foot buffer.	Protocol level desert tortoise. Floristic botanical during spring months.
April 15-19, 29-30, May 1 and 9, 2024	Proposed new work areas. 100 percent survey coverage.	Reconnaissance botanical and protocol surveys for desert tortoise.
April 23-25, 2025	Spot check of the ROW.	Botanical and incidental wildlife.
July 14-23, 2025	Geotechnical areas along the ROW in Nevada.	Pre-construction clearance surveys and monitoring.
August 2025 June 2026	Western Joshua Tree range.	Western Joshua Tree census survey.
August 19-21, 2025, and April 2026	Victorville Substation to five miles past edge of the Mohave ground squirrel range.	Mohave ground squirrel habitat assessment and MGS trapping.
August 23-29, 2025	Entire ROW.	Desert tortoise habitat assessment.
May 8 – December 11, 2025	Entire California portion of ROW.	Protocol and focused desert tortoise surveys. Also noted presence of desert kit fox, badger, bighorn sheep, and western burrowing owl.
March 2026 -June 2026	Entire ROW with 50-foot buffer in California and 300-foot buffer in Nevada.	Floristic botanical surveys.
March-June 2026	Nevada portion of ROW and surveyed areas in	Protocol desert tortoise surveys. Focused

Date	Area Surveyed	Type of Survey
	California.	surveys were conducted for western burrowing owl, desert bighorn sheep, and desert kit fox. Incidental species observed include avian special-status species and other reptiles.
March-May 2026	The Project Area, including a 2-mile survey buffer.	Protocol surveys for golden eagle.
April-June 2026	All areas within and adjacent to the project boundaries along the Mojave River.	USFWS Guideline surveys for least Bell's vireo.

2.5 Vegetation Mapping

Vegetation maps were prepared by drawing tentative vegetation type boundaries onto high-resolution aerial images in the field on tablets using a sub-meter Arrow or Skadi GPS unit and an iPad with a Field Maps application. Mapping was done electronically using ArcGIS Pro and a 22 inch-diagonal flat screen monitor with aerial photos. Vegetation descriptions and names are based on nomenclature used in *A Manual of California Vegetation* (Sawyer et al., 2009).

2.6 Sensitive Plants

Botanical surveys were conducted according to the most recent CDFW survey protocols (CDFW, 2018) with several exceptions discussed in the following paragraphs. Generally, surveys were (a) floristic in nature, (b) consistent with conservation ethics, and (c) inclusive of all habitat types within the Project Area. Previous surveys of the ROW were conducted during period of reduced rainfall or drought which limited the detection of common and sensitive annuals plants. The 2026 surveys are floristic in nature and are performed during the time of year when most species would be detectable. Reference occurrences have been checked and sensitive plant expression for the 2026 season is considered above average. All plant species observed were identified in the field or collected for later identification. Plants were identified using keys, descriptions, and illustrations in Baldwin et al. (2012), the Jepson Flora project (2021), and other regional references. Attachment D (Plant Species Observed Within the Project Area) contains a list of all the plant species identified during the 2021, 2024, 2025, and 2026 surveys.

Below is a general description of the botanical surveys conducted to support the Project.

- 2020-2021. Annual rainfall was relatively low across most of the desert and may not have been adequate for some rare annuals to have germinated and for perennial herbs to have flowered. Although several rare species of annual and perennial herbs were detected during the surveys, it is likely that additional species or populations would be present within the Project Area during an average rain year. All areas that were accessible were surveyed. Surveys were not conducted where the terrain posed a safety risk to the biologists.
- 2025. Additional floristic surveys for special-status plants were attempted in April 2025; however, many of the plants were no longer in bloom.
- 2026. Annual rainfall is above average, and annual plant expression was good across most of the Mojave Desert. Floristic surveys of the ROW were conducted. All accessible areas will be surveyed.

2.7 Western Joshua Tree Surveys

A Western Joshua Tree (WJT) census survey was conducted between August 5 and August 13, 2025, and in April and June of 2026. Supplemental surveys to investigate newly proposed work areas and to document any emerging seedlings were conducted in the spring of 2026. During the 2025 and 2026

surveys the biologists systematically surveyed work areas using 15-m transects and included a 50-foot buffer between the south I-15 (north of Daggett) and the Victorville Switching Station (the westernmost reach of the Project Area). Surveys were conducted by walking transects through the survey areas.

All trees were mapped in ArcGIS Field Maps using a GPS unit with sub-meter accuracy. Data collected in the field included a photo, GPS location, size class, life status (i.e., live, or dead), maturity, reproductive status, height to the nearest tenth of a meter, and any additional relevant information. Each WJT stem or stump that was encountered was mapped as an individual tree and assigned a unique identifier regardless of proximity to other WJT. Dead WJT were also mapped. A tree was considered dead if it had:

- No green leaves, no new growth, and no sprouts at the base;
- Partially or fully burned no more than 18 months prior, had no green leaves, no new growth, and no sprouts at the base;
- Fallen and completely detached from its roots or fallen and its roots were no longer in contact with the soil.

2.8 Habitat Assessment and Wildlife Surveys

Habitat assessments were conducted to predict areas where sensitive plants or wildlife had a higher probability of occurrence such as good quality desert tortoise habitat, sand fields, rock outcrops, or unusual soil types. Attachment E (Wildlife Species Detected Within the Project Area) contains a list of all the wildlife species identified during the 2021, 2024, 2025 and 2026 surveys.

Invertebrates. Biologists periodically searched for terrestrial insects and other invertebrates on flowers and leaves, under loose bark, and under stones and logs on the ground throughout the Project Area. Butterflies and other aerial species were noted when observed. Randomly selected areas within appropriate micro-habitat (i.e., leaf litter, underneath felled logs, rock piles, and woodrat middens, etc.) were visually inspected to determine the presence/absence of gastropods.

Crotch's Bumble Bee Focus Surveys. Prior to the field surveys, a desktop assessment for Crotch's bumble bee (*Bombus crotchii*) was conducted which included a review of the nesting, foraging, and overwintering requirements for the species. In addition, data collected from initial botanical surveys was used to assess areas that were likely to contain suitable habitat for the species along with cooccurring pollinator species. During the botanical surveys qualified biologists with direct experience with Critch's bumble bees searched for animals opportunistically across the ROW particularly in areas supporting floral resources. Protocol surveys are planned for the season prior to construction as portions of the project are within the known range of the species and suitable habitat is present in some locations

Western Monarch Butterfly Focus Surveys. Focused field surveys for this species were not conducted. However, the locations of suitable milkweed species were mapped during botanical surveys in 2026.

Reptiles. Most reptiles were observed opportunistically during various surveys. Reptiles were searched by visually inspecting micro-habitat sites (i.e., basking sites, rock outcrops, leaf litter, wood piles, woodrat middens, on Joshua trees, etc.).

Desert Tortoise Protocol Surveys. The Project Area has been subject to a series of protocol and focused surveys for desert tortoise. Protocol and focused surveys were conducted for the ROW between April and June 2021. Protocol and focused surveys were then conducted for the California portion of the ROW between May and December 2025. Protocol surveys were conducted in 2026 for the Nevada segment of the ROW and in portions of California where new disturbance areas were identified. This species is known to occur along most of the ROW with higher concentrations located in more remote locations where

disturbance is limited and the ROW crosses large areas of suitable habitat. The focus of the 2025 surveys was to document burrows or their sign that occur in or adjacent to proposed work areas and not make determinations of absence if sign was not detected at a given tower or location. During the 2025 surveys the desert tortoise crews initially focused surveys on specific segments of higher quality habitat as described below.

- May-July: Surveys focused east of SR-247 in the Ord-Rodman and Superior-Cronese Critical Habitat Unit (CHU) and area between CHUs.
- August-September: Surveys focused between Ord-Rodman CHU (outside CHU) to Victorville/Mojave River.
- September-October: Surveys focused on the north Soda Mountains/Hollow Hills Wilderness east of SR-127 (outside CHUs).
- November-December: Surveys focused on the Ivanpah CHU to California-Nevada Stateline.

When a desert tortoise was detected, the biologists recorded the location (Latitude/Longitude), sex (if possible), and approximate size (≥ or < 180-millimeter[mm] midline carapace length [MCL]). For all other tortoise sign observed the biologists recorded the location, type of sign (burrow, scat, tracks, or carcass), and class of sign (Class 1 to 5, using definitions described in USFWS 1992 and 2009), as applicable.

Mojave Fringe-toed Lizard Habitat Surveys. This species is known to occur in the Project Area. Reconnaissance level surveys have been completed in and near portions of the ROW containing sand sheets.

Birds. Focused (non-protocol) surveys for birds were conducted during the 2021 and 2024 surveys. Bird species were identified by sight and sound. Avian observations during the 2025 and 2026 surveys were incidental to wildlife surveys focused on special-status reptiles and mammals.

Golden Eagles. Focused (non-aerial) ground-based surveys for golden eagles were conducted in 2026 along the entire ROW.

Western Burrowing Owl Wintering and Breeding Season Surveys. This species is known to occur in the Project Area. Burrowing owl sign and observations of individual burrowing owls were documented during the desert tortoise and other reconnaissance level surveys conducted in 2025 and 2026. Biologists walked 10-meter transects along the Project Area and a minimum of 50-foot buffer and record individuals, sign, and burrows. Potential burrowing owl burrows were identified based on several factors, including the presence of whitewash, pellets, decorations, and/or location within areas that provided suitable conditions. Suitable factors include burrow entrance size and proximity to low-growing vegetation and perch locations. Additional surveys using a wider buffer were conducted in 2026 and would be implemented prior to any construction activities.

Focused Thrasher and Gilded Flicker Surveys. These species are known to occur in the Project Area. Reconnaissance level surveys have been completed in areas supporting higher quality habitat. Focused surveys will be conducted prior to construction.

Terrestrial Mammals. Terrestrial mammal surveys were conducted within specific areas containing suitable micro-habitat. Biologists recorded all animal observations and visually searched for animal signs (i.e., scat, footprints, fur, middens, burrows, etc.). Surveys for bats were not conducted, although a variety of bat species are known to occur in the Mojave Desert.

Mohave Ground Squirrel Habitat Assessment and Trapping. A Mohave ground squirrel (MGS) habitat assessment was conducted between August 19 and 21, 2025 by Kathryn Simon and Adam Walters. Six

factors were utilized to evaluate the suitability of the habitat to support MGS. These included, vegetation, soils, distance to recent record, habitat disturbance, MGS species distribution model, and distance to the MGS range boundary. Based on this assessment, suitable habitat is present commencing north of the Mojave River to the intersection of the Project Area and the 5-mile buffer of the MGS range. Two grid trapping events were conducted in 2026 in the most suitable habitat for this species.

Desert Kit Fox and American Badger Surveys. All suitable burrows were noted during the 2021, 2024, 2025, and 2026 surveys. The purpose of these surveys was to identify habitat and suitable burrows capable of supporting American badger (*Taxidea taxus*) and desert kit fox (*Vulpes macrotis arsipus*). Surveys were performed throughout the entire Project Area and a 50-foot buffer by walking 10-meter transects. All potential burrows or dens encountered were thoroughly examined and general size and shape along with any signs of occupancy were recorded on a GPS unit. Potential desert kit fox burrows and dens were identified based on the presence of multiple entrances, burrow shape, and the presence of scat and tracks while American badger burrows and dens were identified based on horizontal scrapes along the walls of the entrance and the presence of large spoils.

3.0 Environmental Setting

3.1 Regional Conditions

The Project is in the Mojave Desert, a hot, dry desert region south of the Sierra Nevada Mountains and east-northeast of the Transverse Ranges. Climate conditions are characterized by large fluctuations in daily temperature, high seasonal winds, and low humidity. Annual precipitation ranges from three to six inches and mainly occurs in the winter and spring months. Unique years such as the 2025-2026 rain year can generate increased rainfall, when subtropical air from the south moves into the area and creates monsoonal thunderstorms. Alternatively, years of drought can yield average rainfall of less than one inch for the entire year. The region also receives periodic snowfall during cold winter storms. Elevations in the Mojave Desert range from about 280 feet above mean sea level (amsl) near Death Valley to approximately 8,000 feet amsl near Clark Mountain. However, most of the Mojave Desert ranges between 2,000 feet and 5,000 feet amsl, characteristic of the High Desert found throughout the Mojave.

The Mojave Desert is characterized by widely scattered steep mountain ranges, dry lakes (playas), relatively flat plains (basins), bajadas (alluvial fans or debris flows), intermittent drainages, sand sheets, and volcanic landforms. The Project route crosses multiple bajadas, intermittent drainages, dry lakes, and mountains.

Most of the Project route crosses largely undeveloped federal lands under the jurisdiction of the BLM, specifically within the jurisdiction of three BLM field offices (Las Vegas Field Office in Nevada, and the Needles and Barstow Field Offices in California). Designated conservation areas that are adjacent or near the proposed Project include National monuments, wilderness areas, and Important Bird Areas (IBAs) (Attachment A, Figure 4). The Project also crosses rural and low-density residential areas on non-federal land in San Bernardino County, California and Clark County, Nevada.

Several BLM designated conservation lands overlap the Project route, including Areas of Critical Environmental Concern (ACECs) and Designated Essential Connectivity Areas. Designated Essential Connectivity Areas are largely owned by BLM to protect undisturbed habitat that serve as critical connectivity points to support wildlife movement and gene flow, including the Mid Hills/Ivanpah, Valley/New York, Mountains-Calico Mountains, and the San Bernardino Mountains -Calico Mountains Essential Connectivity Areas.

The Project ROW is outside of the National Monument and except for access roads the Project does not occur in National Wilderness Areas. The closest wilderness areas to the ROW include the North and South McCullough Wilderness and the Avi Kwa Ame National Monument in Nevada. In California, the Project is near Stateline Wilderness, Mesquite Wilderness, Kingston Range Wilderness, Avawatz Mountains Wilderness, Hollow Hills Wilderness, Soda Mountains Wilderness, and the Newberry Mountains Wilderness areas. The Project Area includes Kingston Road east of the East Mojave National Scenic Area and Death Valley Road between Hollow Hills Wilderness and the Soda Mountains Wilderness Study Area.

The Project is located within the Desert Renewable Energy Conservation Plan (DRECP) Land Use Plan Amendment (LUPA) area and extends through several ACECs. These include the Ivanpah, Shadow Valley, Soda Mountain Wilderness Study Area (WSA), Soda Mountain Expansion, Superior-Cronese, Daggett Ridge Monkey Flower, Ord-Rodman, Northen Lucerne Wildlife Linkage, and Brisbane Valley Flower. In Nevada, the Project site is approximately three miles north of the Piute/Eldorado ACEC. (Attachment A, Figure 4)

The Project is within the California Desert Conservation Areas (CDCA) and subsequent DRECP planning area. The eastern section of Project intersects with several DRECP Development Focus Areas (DFAs) north of Victorville and east of I-40 near Gale. Portions of the Project also occur within a Section 368 Energy Corridor which was excluded from the DRECP LUPA. These designated corridors are subject to the Interagency Operating Procedures (IOPs) adopted in the Approved Resource Management Plan (RMP) Amendments/Record of Decision (ROD) for the document entitled “Designation of Energy Corridors on Bureau of Land Management-Administered Lands in the 11 Western States” issued in January 2009.

Portions of the ROW are also located within the proposed Town of Apple Valley Multi-Species Conservation Plan Area and the Clark County Multiple Species Habitat Conservation Plan (MSHCP). The Apple Valley Multi-Species Conservation Plan is still in the planning process but may be completed at some during the planning or construction of the Project. The Nevada segment of the Project would adhere to the recommendations for environmental stewardship and survey requirements.

The Project ROW also overlaps with United States Fish and Wildlife Service (USFWS) designated critical habitat for the desert tortoise (*Gopherus agassizii*). This includes the Piute-Eldorado critical habitat unit (CHU) in Nevada and the Ivanpah, Superior-Cronese, Ord-Rodman CHUs in California. The Project also crosses the Mohave River Critical habitat unit for the southwestern willow flycatcher (*Empidonax traillii extimus*) at the Mojave River (Attachment A, Figure 5) (USFWS, 1994; USFWS, 2013; USFWS, 2005).

3.2 Vegetation Communities and Landforms

Vegetation that occurs in the Project Area is the result of various biotic and abiotic factors including elevation, aspect, proximity to water, disturbance, fire frequency, concentrations of non-native cover, landforms, and soil types. Generally, these vegetation communities can be classified into riparian and upland communities. Vegetation communities were mapped using *A Manual of California Vegetation* (Sawyer et al, 2009). A few areas that did not fit the specific descriptions described by Sawyer et al, such as areas subject to disturbance or in areas that have little to no vegetation. These areas have been listed as “other cover types” and are described below.

Riparian Vegetation. Riparian habitats are characterized by high biological productivity and often support a diverse assemblage of plants and wildlife. In an otherwise arid landscape, primary productivity in riparian habitats is higher due to increased soil moisture. High plant productivity leads to increased habitat structural diversity and increased food availability for herbivorous animals, and in turn, predatory animals (Faber, 1989). During warmer months, large numbers of insects provide a prey base for diverse bird fauna. Structural diversity is also much more evident in riparian systems than those of most regional uplands.

Riparian communities are restricted to Fremont cottonwood forest and woodland located at the Mojave River. However, there are several xeric riparian communities that occur in the numerous washes and bajadas crossed by the Project.

Upland Vegetation. Most of the Project Area is dominated by xeric upland plant communities that are adapted to the harsh desert conditions. Many of these species require only seasonal precipitation to obtain adequate water resources for growth and reproduction but can flourish during periods of above average rainfall. Similarly, many annual species that occur within perennial vegetation communities are only present if adequate seasonal rainfall occurs.

Table 3 provides a summary of the permanent and temporary impacts to vegetation communities and land cover types in the Project disturbance area (Attachment A, Figure 6). In general, the alignment is dominated by different creosote bush (*Larrea tridentata*) scrub alliances followed by Mojave yucca scrub, and Joshua tree woodland.

Table 3. Summary of Vegetation Communities and Cover Types in the Project Area

Vegetation Communities and Land Cover Types[1]	Permanent Impacts (acres)			Temporary Impacts (acres)			Total Impacts (acres)
	CA	NV	Total (acres)	CA	NV	Total (acres)	
Acton's and Virgin River brittlebush - net-veined goldeneye scrub (*Encelia (actonii, virginensis) - Viguiera reticulata* Shrubland Alliance) G3 S3(CA)[1]	0.1	0.0	0.1	0.7	0.0	0.7	0.8
Allscale scrub (*Atriplex polycarpa* Shrubland Alliance) - G4 S4(CA)	4.0	1.2	5.2	182.4	8.3	190.7	195.9
Black brush scrub (*Coleogyne ramosissima* Shrubland Alliance) - G5 S4(CA)	0.2	0.0	0.2	1.3	0.00	1.3	1.5
Buckhorn cholla / big galleta grass scrub (*Cylindropuntia acanthocarpa / Pleuraphis rigida* Shrubland Alliance) - GNR S4(CA)	-	4.3	4.3	--	21.3	21.3	25.6
Catclaw acacia – desert lavender – chuparosa scrub (*Senegalia greggii – Hyptis emoryi – Justicia californica* Shrubland Alliance) - G4 S4(CA)	0.3	-	0.3	6.4	-	6.4	6.7
Cheesebush – sweetbush scrub (*Ambrosia salsola – Bebbia juncea* Shrubland Alliance) - G4 S4(CA)	2.8	1.8	4.6	31.1	7.7	38.9	43.4
Creosote bush – brittlebush scrub (*Larrea tridentata – Encelia farinosa* Shrubland Alliance) - G5 S4(CA)	-	5.3	5.3	-	14.3	14.3	19.7
Creosote bush – white bursage scrub (*Larrea tridentata – Ambrosia dumosa* Shrubland Alliance) - G5 S5(CA)	101.4	46.4	147.8	937.2	284.7	1221.9	1369.7
Creosote bush scrub (*Larrea tridentata* Shrubland Alliance) - G5 S5(CA)	172.6	4.4	177.1	1568.4	18.8	1587.3	1764.3
Death Valley joint fir scrub (*Ephedra funerea* Shrubland Alliance) - G3 S3(CA)	-	0.1	0.1	-	0.6	0.6	0.8
Desert almond - Mexican bladdersage scrub (*Prunus fasciculata - Salazaria mexicana* Shrubland Alliance) - G4 S4(CA)	0.01	-	0.01	0.3	-	0.3	0.3

Vegetation Communities and Land Cover Types[1]	Permanent Impacts (acres)			Temporary Impacts (acres)			Total Impacts (acres)
	CA	NV	Total (acres)	CA	NV	Total (acres)	
Desert holly scrub (*Atriplex hymenelytra* Shrubland Alliance) - G5 S4(CA)	0.6	-	0.6	5.4	-	5.4	6.0
Fremont cottonwood forest and woodland (*Populus fremontii - Fraxinus velutina - Salix gooddingii* Forest & Woodland Alliance) - G4 S3.2(CA)	-	-	-	-	-	-	-
Fremont's smokebush – Nevada smokebush scrub (*Psorothamnus fremontii - Psorothamnus polydenius* Shrubland Alliance) - G4? S3(CA)	0.01	-	0.01	0.4	-	0.4	0.4
Joshua tree woodland (*Yucca brevifolia* Woodland Alliance) - G4 S3(CA)	42.5	-	42.5	256.3	-	256.3	298.8
Mojave yucca scrub (*Yucca schidigera* Shrubland Alliance) - G4 S4(CA)	25.4	12.3	37.8	234.2	63.1	297.4	335.1
Needleleaf rabbitbrush scrub (*Ericameria teretifolia* Shrubland Alliance) - G4 S4(CA)	1.2	-	1.2	11.2	-	11.2	12.4
Nevada joint fir – Anderson's boxthorn – spiny hop sage scrub (*Ephedra nevadensis – Lycium andersonii – Grayia spinosa* Shrubland Alliance) - G5 S3S4(CA)	2.3	2.5	4.8	22.3	7.1	29.5	34.3
Rigid spineflower – hairy desert sunflower (*Chorizanthe rigida – Geraea canescens* Desert Pavement Sparsely Vegetated Alliance) - G4 S4(CA)	8.7	-	8.7	62.6	-	62.6	71.3
Shadscale scrub (*Atriplex confertifolia* Shrubland Alliance) - G5 S4(CA)	-	-	-	0.3	-	0.3	0.3
Teddy bear cholla patches (*Cylindropuntia bigelovii* Shrubland Alliance) G4 S3(CA)	-	-	-	-	-	-	-
White bursage scrub (*Ambrosia dumosa* Shrubland Alliance) - G5 S5(CA)	1.4	0.2	1.6	18.7	1.3	20.0	21.5
Other Cover Types							
Agricultural	3.1	-	3.1	139.6	-	139.6	142.7
Disturbed/Developed	42.4	11.6	54.0	1264.4	238.0	1502.4	1556.4
Dry lakebed	2.4	0.5	2.9	16.6	7.1	23.7	26.6
Open water	-	-	-	-	-	-	-
Sparsely vegetated sand dune	1.0	-	1.0	12.3	-	12.3	13.4
Unvegetated wash	0.04	-	0.04	3.2	-	3.2	3.2
Grand Total	412.5	90.6	503.1	4775.3	672.5	5447.8	5950.9

1. These communities/land cover types are not defined in Sawyer et al. (2009) or Holland (1986) but are included in this table for acreage calculation purposes.

In addition to the vegetation communities described above, areas beneath existing transmission towers support a subset of vegetation communities that are generally characterized as early successional due to ongoing operations and maintenance activities. While these areas include native species and provide some wildlife habitat, vegetation structure and composition are reduced or altered compared to

adjacent, less disturbed communities. Table 4 summarizes the permanent impacts to areas beneath the towers.

Table 4. Impacts to Vegetation Communities and Land Cover Types under Existing Tower Locations

Vegetation Communities and Land Cover Types[1]	Permanent Impacts under Existing Towers (acres)		
	CA	NV	Total (acres)
Acton's and Virgin River brittlebush - net-veined goldeneye scrub (*Encelia (actonii, virginensis)) - Viguiera reticulata* Shrubland Alliance)	0.03	-	0.03
Allscale scrub (*Atriplex polycarpa* Shrubland Alliance)	0.9	0.2	1.1
Black brush scrub (*Coleogyne ramosissima* Shrubland Alliance)	0.1	-	0.1
Buckhorn cholla / big galleta grass scrub (*Cylindropuntia acanthocarpa / Pleuraphis rigida* Shrubland Alliance)	-	0.9	0.9
Catclaw acacia – desert lavender – chuparosa scrub (*Senegalia greggii – Hyptis emoryi – Justicia californica* Shrubland Alliance)	0.02	-	0.02
Cheesebush – sweetbush scrub (*Ambrosia salsola – Bebbia juncea* Shrubland Alliance)	0.5	0.2	0.7
Creosote bush – brittlebush scrub (*Larrea tridentata – Encelia farinosa* Shrubland Alliance)	-	0.7	0.7
Creosote bush – white bursage scrub (*Larrea tridentata – Ambrosia dumosa* Shrubland Alliance)	23.2	9.8	33.0
Creosote bush scrub (*Larrea tridentata* Shrubland Alliance)	42.6	0.8	43.4
Death Valley joint fir scrub (Ephedra funerea Shrubland Alliance)	-	-	-
Desert almond - Mexican bladdersage scrub (*Prunus fasciculata - Salazaria mexicana* Shrubland Alliance)	0.004	-	0.004
Desert holly scrub (*Atriplex hymenelytra* Shrubland Alliance)	0.2	-	0.2
Fremont cottonwood forest and woodland (*Populus fremontii - Fraxinus velutina - Salix gooddingii* Forest & Woodland Alliance)	-	-	-
Fremont's smokebush – Nevada smokebush scrub (*Psorothamnus fremontii - Psorothamnus polydenius* Shrubland Alliance)	-	-	-
Joshua tree woodland (*Yucca brevifolia* Woodland Alliance)	8.2	-	8.2
Mojave yucca scrub (*Yucca schidigera* Shrubland Alliance)	6.4	2.6	9.0
Needleleaf rabbitbrush scrub (*Ericameria teretifolia* Shrubland Alliance)	0.3	-	0.3
Nevada joint fir – Anderson's boxthorn – spiny hop sage scrub (*Ephedra nevadensis – Lycium andersonii – Grayia spinosa* Shrubland Alliance)	0.7	0.4	1.1

Vegetation Communities and Land Cover Types[1]	Permanent Impacts under Existing Towers (acres)		
	CA	NV	Total (acres)
Rigid spineflower – hairy desert sunflower (*Chorizanthe rigida – Geraea canescens* Desert Pavement Sparsely Vegetated Alliance)	1.5	-	1.5
Shadscale scrub (*Atriplex confertifolia* Shrubland Alliance)	--	-	-
Teddy bear cholla patches (*Cylindropuntia bigelovii* Shrubland Alliance)	-	-	-
White bursage scrub (*Ambrosia dumosa* Shrubland Alliance)	0.5	-	0.5
Other Cover Types			
Agricultural	0.9	-	0.9
Disturbed/Developed	32.9	8.1	41.0
Dry lakebed	0.5	0.2	0.7
Open water	-	-	-
Sparsely vegetated sand dune	0.4	-	0.4
Unvegetated wash	0.02	-	0.02
Grand Total	119.8	23.8	143.7

1. These communities/land cover types are not defined in Sawyer et al. (2009) or Holland (1986) but are included in this table for acreage calculation purposes.

Acton's and Virgin River brittlebush - net-veined goldeneye scrub (*Encelia* [*actonii, virginensis*] - *Viguiera reticulata* Shrubland Alliance). Acton's and Virgin River brittlebush - net-veined goldeneye scrub is characterized by a mixture of Acton's brittle bush (*Encelia actonii*), Virgin River brittle bush (*Encelia virginensis*) or net-veined goldeneye (*Viguiera reticulata*) as dominants or co-dominants within the shrub layer. Typically, Virgin River brittle bush has no more than two percent absolute cover in the shrub canopy. Additional species observed within the community included Dorr's sage (*Salvia dorrii*), white bursage, cheesebush (*Ambrosia salsola*), California croton (*Croton californicus*) and wire lettuce (*Stephanomeria pauciflora*). This community was observed within the northeastern portion of the California segment along a desert wash from Line 1 Tower 32-5 to Tower 33-1. Acton's and Virgin River brittle brush - net-veined goldeneye scrub is recognized as sensitive by CDFW (2024) and has a CNPS rank of S3.

Allscale scrub (*Atriplex polycarpa* Shrubland Alliance). Allscale scrub is characterized by the dominance of allscale (*Atriplex polycarpa*) comprising two percent or more of the absolute cover in the shrub canopy. Additional species such as cheesebush, and fourwing saltbush (*Atriplex cansescens*) are present within the community. This community occupies areas of sandy soils within alluvial fans and along the shores of dry lake beds and washes within the California and Nevada segments of the Project Area. It is also fairly disturbance tolerant yet easily invaded. Where this alliance was observed near I-15, railroads, or agricultural lands it was often colonized by abundant patches of Russian thistle (*Salsola tragus*) and saltlover (*Halogeton glomeratus*).

Black brush scrub (*Coleogyne ramosissima* Shrubland Alliance). Black brush scrub is characterized by the presence of black brush (*Coleogyne ramosissima*) comprising two percent or more of the absolute cover in the shrub canopy. Additional species such as fourwing saltbush, needleleaf rabbitbrush (*Ericameria teretifolia*), California buckwheat (*Eriogonum fasciculatum*), California barrel cactus (*Ferocactus cylindraceus*), creosote bush, and Mohave yucca are also present within the community. Black brush scrub was found on rocky slopes at Line 1 Tower 33-3 within the California segment.

Buckhorn cholla/big galleta grass scrub (*Cylindropuntia acanthocarpa/Pleuraphis rigida* Shrubland Alliance). Buckhorn cholla/big galleta grass scrub is characterized by the presence of buckhorn cholla (*Cylindropuntia acanthocarpa*), Cooper's goldenbush (*Ericameria cooperi*), rayless goldenhead (*Acamptopappus sphaeracephala*) with Cooper's goldenbush comprising more than 50 percent or more relative cover of the shrub layer. An open to intermittent herb layer with seasonal annuals is usually present. Additional species observed within the community include creosote bush, Mohave yucca, Nevada joint-fir, California barrel cactus, and brittlebush. This community was observed in mountainous areas of the Nevada portion of the ROW. Big galleta (*Pleuraphis [Hilaria] rigida*) appeared to be more dominant where localized hydrology was present such as in small arroyos and washes.

Catclaw acacia – desert lavender – chuparosa scrub (*Senegalia greggii – Hyptis emoryi – Justicia californica* Shrubland Alliance). The Catclaw acacia – desert lavender – chuparosa scrub is a semi-desert shrubland community found in the southwestern U.S. and northern Mexico, especially in desert washes, arroyos, and rocky slopes with well-drained soils. It is characterized by an open shrub canopy (under approximately 3 m tall) dominated by catclaw acacia, desert lavender, and chuparosa, along with a variety of other desert shrubs and occasional small trees. Vegetation is typically sparse at the ground layer, with seasonal herbs appearing after rainfall. This community is adapted to arid conditions, periodic flooding, and disturbance such as fire, with many species capable of resprouting and persisting in dynamic desert environments. This community was observed within the Clark Mountains at a few locations within the California segment.

Cheesebush – sweetbush scrub (*Ambrosia salsola – Bebbia juncea* Shrubland Alliance). Cheesebush – sweetbush scrub is a desert wash community characterized by a mixture cheesebush and sweetbush (*Bebbia juncea*) with more than two percent absolute cover of cheesebush in the shrub canopy. Additional species observed within the community include creosote bush, beavertail, silver cholla (*Cylindropuntia echinocarpa*), and California buckwheat. This community was observed within arroyos and washes present in the Ivanpah Valley of the California segment and within larger desert washes in the Nevada segment. In addition, cheesebush is a successful disturbance colonizer and several previously disturbed sites (i.e., construction tailings and revegetated roads) where cheesebush dominated and robust enough to not be considered disturbed and developed.

Creosote bush – brittlebush scrub (*Larrea tridentata – Encelia farinosa* Shrubland Alliance). Creosote bush – brittlebush scrub is characterized by a mixture of creosote bush (*Larrea tridentata*) and brittlebush (*Encelia farinosa*) dominant with more than one percent absolute cover of each in the shrub canopy. Other species observed within the community include white bursage, desert trumpet (*Eriogonum inflatum*), wire lettuce, and California barrel cactus. This community is found on upper slopes and steep hillsides of the McCullough Range at Line 1 Tower 8-1 and Line 2 Tower 8-2 within the Nevada segment.

Creosote bush scrub (*Larrea tridentata* Shrubland Alliance). Creosote bush scrub is an upland vegetation type that is characterized by creosote bush (*Larrea tridentata*) which is the dominant shrub with white bursage (*Ambrosia Dumosa*) and brittlebush absent or less than one percent absolute cover in the shrub layer. Other species observed within the community (but in much lower numbers) include fourwing saltbush, Nevada joint fir, and Anderson thornbush (*Lycium andersonii*). This is the most prevalent vegetation community along much of the Project Area within the California segment and on south-facing slopes of the McCullough Range within the Nevada segment.

Creosote bush – white bursage scrub (*Larrea tridentata – Ambrosia dumosa* Shrubland Alliance). Creosote bush–white bursage scrub is an upland vegetation that is characterized by creosote bush (*Larrea tridentata*) and white bursage (*Ambrosia Dumosa*) which co-dominate with more than one percent absolute cover of each in the shrub canopy. Additional species observed within the community include

cheesebush, fourwing saltbush, allscale, brittlebush, and Anderson thornbush. This community was observed within alluvial fans and upland slopes along much of the Project Area in both the California and Nevada segments.

Death Valley joint fir scrub (*Ephedra funerea* Shrubland Alliance). Death Valley joint fir scrub is an upland community characterized by Death Valley joint fir (*Ephedra funerea*) which is the dominant or co-dominant shrub with more than 30 percent relative cover with other shrubs. Additional species observed within this community include white bursage, creosote, and littleleaf rhatany (*Krameria erecta*). This community was only observed on south facing limestone slopes northeast of Primm, Nevada. Death Valley joint fir scrub is considered sensitive with a CNPS rank of S3.

Desert almond – Mexican bladder sage scrub (*Prunus fasciculata – Salazaria mexicana* Shrubland Alliance). Desert almond – Mexican bladder sage scrub is a desert wash community characterized by a mixture of co-dominant desert almond (*Prunus fasciculata*) and Mexican bladder sage (*Salazaria mexicana*) with more than two percent absolute cover of desert almond in the shrub canopy. Additional species observed within this community include cheesebush, fourwing saltbush, creosote bush, Anderson thornbush, and Mohave yucca (*Yucca schidigera*). This community was observed within arroyos and washes at Line 1 Towers 33-4 and 33-5 and Line 2 32-5 of the Nevada segment.

Desert holly scrub (*Atriplex hymenelytra* Shrubland Alliance). Desert holly scrub is characterized by desert holly (*Atriplex hymenelytra*) with more than one percent absolute cover with no other species with equal or higher cover and with desert holly or honey sweet (*Tidestromia oblongifolia*) with more than 30 percent relative cover in the shrub canopy. Additional species observed within this community include white bursage, shadscale, downy dalea (*Dalea mollissima*), brittlebush, and creosote bush. This community was observed north of Afton and east of Fort Irwin, where it occurs in dry arroyos and washes.

Rigid spineflower-hairy desert sunflower (*Chorizanthe rigida – Geraea canescens* Desert Pavement Sparsely Vegetated Alliance). Rigid spineflower-hairy desert sunflower is characterized by a dominance of rigid spineflower (*Chorizanthe rigida*) and/or hairy desert sunflower (*Geraea canescens*) which are usually present in the herbaceous layer. Additional species such as pebble pincushion (*Chaenactis carphoclinia*), desert plantain (*Plantago ovata*), and desert heron's bill (*Erodium texanum*) are also present in low numbers. This vegetation is sparse and seasonal, depending on the amount of seasonal precipitation. The substrate in these areas is distinct and is covered with closely packed, interlocking angular or rounded rock fragments of pebble and cobble size. This vegetation community and associated pavement is found on level or gently sloping desert flats, fans, or bajadas and lake and river terraces. A large area of rigid spineflower-hairy desert sunflower is located near Alvord Mountain Road in the California segment.

Fremont's smokebush – Nevada smokebush scrub (*Psorothamnus fremontii - Psorothamnus polydenius* Shrubland Alliance). Fremont's smokebush – Nevada smokebush scrub is characterized by the presence of Fremont's smokebush (*Psorothamnus fremontii*), Mojave indigo bush (*Psorothamnus arborescens)* or Nevada smokebush (*Psorothamnus polydenius*). Additional species such as catclaw acacia, cheesebush, sweetbush, winter fat (*Krascheninnikovia lanata*), and Mojave cottonthorn (*Tetradymia stenolepis*) are also present. This community was only observed in a wash in the central Clark Mountains in California. Fremont's smokebush – Nevada smokebush scrub is considered sensitive with a CNPS rank of S3.

Fremont cottonwood forest and woodland (*Populus fremontii - Fraxinus velutina - Salix gooddingii* Forest & Woodland Alliance). Fremont cottonwood forest and woodland is characterized by a dominance of Fremont cottonwood (*Populus fremontii*). Additional species such as sandbar willow (*Salix exigua*), polished willow (*Salix laevigata*), mule fat (*Baccharis salicifolia*), and tule (*Schoenoplectus acutus* var.

occidentalis) are also present. This community was observed in the Mojave River just northeast of the Victorville Substation, within the California segment. Fremont cottonwood forest and woodland is considered sensitive by CDFW (2024) with a State Rarity rank of S3.2.

Joshua tree woodland (Y*ucca brevifolia* Woodland Alliance). Joshua tree woodland is characterized by the dominance of Joshua tree (*Yucca brevifolia*) evenly distributed at greater than one percent cover and less than one percent juniper (*Juniperus* spp.) and/or pines (*Pinus* spp.) in the tree canopy. Additional species observed within the community include white bursage, cheesebush, California barrel cactus, California buckwheat, and Mojave yucca. This community was observed within alluvial fans, ridges, and slopes in the Clark Mountains west to Excelsior Mine Road within the California segment. Joshua tree woodland is considered sensitive by CDFW (2024) with a State Rarity rank of S3.2.

Mojave yucca scrub (*Yucca schidigera* Shrubland Alliance). Mojave yucca scrub is characterized by the dominance of Mojave yucca (*Yucca schidigera*) with more than two percent absolute cover in the shrub or small tree canopy. Additional species observed within this community include white bursage, black brush, buck horn cholla, brittlebush, and creosote bush. This community was observed within alluvial fans and rocky slopes within the western Ivanpah Valley, Clark Mountains and within the Granite Mountains of the California segment. In the Nevada segment this community was observed on west-facing slopes of the McCullough Range.

Needleleaf rabbitbrush scrub (*Ericameria teretifolia* Shrubland Alliance). Needleleaf rabbitbrush scrub is characterized by the dominance of needleleaf rabbitbrush (*Ericameria teretifolia*) within the shrub canopy. Additional species observed within this community include buck horn cholla, California buckwheat, desert almond, desert mallow (*Sphaeralcea ambigua*), and Mexican bladder sage. This community is found on rocky slopes on the southwestern portion of the California segment at Line 1 Towers 156-2 to 156-3 and Line 2 Towers 155-2 to 155-3.

Nevada joint fir - Anderson's boxthorn - spiny hop sage scrub (*Ephedra nevadensis - Lycium andersonii - Grayia spinosa* Shrubland Alliance). Nevada joint fir - Anderson's boxthorn - spiny hop sage scrub is characterized by a dominance of Nevada joint fir (*Ephedra nevadensis*), hop sage (*Grayia spinosa*), and Anderson boxthorn (*Lycium andersonii*) with more than two percent absolute cover in the shrub canopy. Usually there is a strong dominant species with more than two-times the cover relative to other species. Additional species observed within this community include spiny desert olive (*Menodora spinescens*), cheesebush, black bush, California buckwheat, and Mexican bladder sage. This community was observed within arroyos and washes within the western Ivanpah Valley at Line 1 Towers 33-5 to 34-1 and Line 2 Towers 33-1 to 33-2 in the California segment. In Nevada, this community is located on rocky slopes within the Spring Mountains. This vegetation community is considered sensitive by CDFW (2024) and has a CNPS rank of S3.

Shadscale scrub (*Atriplex confertifolia* Shrubland Alliance). The shadscale scrub is a widespread semi-desert plant community found across much of the western United States, including California. It is dominated by low-growing shadscale shrubs, typically under 1 meter tall, forming an open to sometimes continuous canopy with a variable and often sparse herbaceous layer. This vegetation type occurs on dry, often alkaline or saline soils in settings such as flats, bajadas, rocky slopes, and playa margins. Shadscale commonly co-occurs with other desert shrubs like saltbushes, greasewood, and Mormon tea. The alliance is adapted to harsh, arid environments with poor soils, and is characteristic of cool semi-desert regions where plants tolerate salinity, drought, and temperature extremes. This community was observed west of Soda Mountain and west of Line 2 Tower 105-4 within the California segment.

Tamarisk thickets (*Tamarix spp. Shrubland Semi-Natural* Alliance). Tamarisk thickets are characterized by a mixture of tamarisk (*Tamarix ramosissima*) or another *Tamarix* species as dominant in the tree canopy with three percent absolute cover and more than 60 percent relative cover compared to other microphyllous trees or shrubs. Additional species observed within this community were limited to California croton and Russian thistle. This community was observed within the dry riverbed of the Mojave River in the California segment.

Teddy bear cholla patches (*Cylindropuntia bigelovii*) Shrubland Alliance. Teddy bear cholla patches is characterized by a dominance of teddy bear cholla (*Cylindropuntia bigelovii*) with more than 50 percent relative cover within the shrub layer. Additional species observed within this community include creosote bush, white bursage, California barrel cactus, buck horn cholla, and littleleaf rhattany. Although these species were present, they were sparse due to the dense clonal nature of teddy bear cholla. This community was mostly found along the eastern McCullough Pass but is not restricted to Nevada. Teddy bear cholla patches were not found in California but are considered sensitive with a CNPS rank of S3.

White bursage scrub (*Ambrosia dumosa* Shrubland Alliance). White bursage scrub is characterized by the dominance of white bursage (*Ambrosia Dumosa*) with more than one percent of absolute cover and less than one percent of creosote bush absolute cover within the shrub layer. Additional species observed within this vegetation community consists of black brush, brittlebush, creosote bush, beavertail, and buck horn cholla. This community was observed within alluvial fans and rocky hills at Line 1 Towers 105-1 and 105-6 and Line Towers 104-2 and 105-1 within the California segment.

Other Cover Types

Agriculture. This community consists of fallow agricultural fields located within the developed areas on the southern side of the Mojave River near Barstow in the California segment. Native vegetation within these areas has been removed and current vegetation consists of non-native annuals including red stemmed filaree (*Erodium cicutarium*), Russian thistle, London rocket (*Sisymbrium irio*), and Arabian schismus (*Schismus arabicus*).

Developed/Disturbed. Developed or disturbed consists of existing access roads, public roads, private residences, railroad ROW, and other developed areas. This cover type is located along California and Nevada segments.

Dry lakebed. Dry lakebed consists of dry lakes and playas which are largely devoid of vegetation. When vegetation is present, it generally consists of non-native annuals including red stemmed filaree, mustards and annual grasses. Dry lakebeds present in the California segment include Silver Lake and playas located to the west near the ROW. In the Nevada segment dry lakebeds are present at Roach Lake at Line 1 Tower 25-5 and 25-6.

Open water. Open water cover types are characterized as areas covered with freshwater that largely lack vegetation. This type of cover is present in the California segment at the Mojave River just northeast of the Victorville Substation. Vegetation such as chairmaker's bulrush (*Schoenoplectus americanus*), tall cyperus (*Cyperus eragrostis*), bur marigold (*Bidens laevis*), and seaside heliotrope (*Heliotropium curassavicum*) may be present in the late summer and fall when flows become reduced.

Sparsely vegetated wash. Sparsely vegetated wash is used to map predominantly unvegetated wash features characterized by scattered shrubs such as sweetbush and cheesebush. Shrub seedlings may be present but occur at very low densities. These washes typically support a high abundance of spring annual species. This cover type was observed within the dry riverbed of the Mojave River in the California segment at Line 1, Tower 123-2 and Line 2, Tower 122-2.

3.3 Common Plant Species Observed

More than 300 genera, species, subspecies, or varieties of plants were observed within the Project Area during the surveys. Attachment D provides a list of all plants detected in the Project Area.

3.4 Noxious and Invasive Weeds

Noxious weeds are plants that can directly or indirectly cause problems for agriculture, natural resources, wildlife, recreation, navigation, public health, or the environment (CDFA, 2021). The California Department of Food and Agriculture (CDFA) (CDFA, 2021), California Invasive Plant Council (Cal-IPC) (Cal-IPC, 2021) the Nevada Department of Agriculture (NDA) (NDA, 2024), and the U.S. Department of Agriculture (USDA) (USDA, 2010) have rated noxious weeds in California and Nevada based on the threat these species pose to the natural landscape.

Weeds are widespread in the Survey Area and locally abundant in some areas. Some of the common species detected during surveys included tumbleweed *(Amaranthus* sp.), short-pod mustard (*Hirschfeldia incana*), mustard (*Sisymbrium* sp.), Sahara mustard (*Brassica tournefortii*), Paulsen's Russian thistle (*Salsola paulsenii*), field bindweed (*Convolvulus arvensis*), redstem filaree (*Erodium cicutarium*), prickly lettuce (*Lactuca serriola*), and horse nettle (*Solanum elaeagnifolium*). Red brome (*Bromus rubens*), cheatgrass (*Bromus tectorum*), Bermuda grass (*Cynodon dactylon*), foxtail barley (*Hordeum murinum*), Mediterranean grass (*Schismus* sp.), common wheat (*Triticum aestivum*), herb Sophia (*Descurainia sophia*), and slender oat grass (*Avena barbata*) are also present (Attachment D).

3.5 Common Wildlife and Fish Species

The Project Area supports a wide variety of common and sensitive wildlife that are typical of Mojave Desert communities. Upland communities are the dominant vegetation type in the region; however, a small section of riparian habitat is present in the Mojave River approximately 350 feet from Line 1 Tower 162-2 near the Victorville Switching Station. The Project Area provides microhabitat conditions for a variety of terrestrial invertebrates. These microhabitats can be found at ground level within friable soils or under vegetation, woody debris, rocks, and trash piles. They can also occur within vegetation which provides refuge from predators, food resources for some species, and substrates for various invertebrate life stages. Attachment E provides a list of all wildlife species detected in the Project Area.

Invertebrates. Some of the common invertebrates that were identified during field surveys included harvester ants (*Pogonomyrmex* sp.), armored stink beetle (*Eleodes armata*), desert hairy scorpion (*Hadrurus arizonensis*), wind scorpion (*Eremorhax* sp.), longhorn beetle (*Plionoma rubens*), western tent caterpillar (*Malacosoma californica*), and yucca moth (*Scyphophorus yuccae*). Other common invertebrates expected to occur include velvet ant (*Dasymutilla* sp.), Say's stink bug (*Chlorochroa sayi*), seven-spotted ladybug (*Coccinella septempunctata*), elegant blister beetle (*Eupompha elegans*), and pallid-winged grasshopper (*Trimerotropis pallidipennis*). Native and non-native bees and butterflies also occur and include western honeybees (*Apis millifera*), urbane digger bees (*Anthophora urbana*), queen butterfly (*Danaus gilippus*), and painted lady (*Vanessa cardui*). Victorville shoulderband *(Helminthoglypta mohaveana)* was observed near the Mojave River and Line 1, Tower 162-1 and Line 2, Tower 161-1. In addition, another shoulderband snail of the genus *Cahuillus* sp. has been documented inhabiting rocky talus slopes in the Red Pass area and southwest of Eastgate adjacent to the Fort Irwin National Training Center (NTC) in San Bernardino County, California. Red Pass is a narrow mountain gap in the Avawatz Mountains, characterized by steep slopes, canyon mouths, and extensive talus accumulations (United States Department of the Army, 2024).

Fish. No fish were identified in the Project Area however there are iNaturalist records of several fish species in the Mojave River including three-spined stickleback (*Gasterosteus aculeatus*), largemouth bass (*Micropterus nigricans*), channel catfish (*Ictalurus punctatus*), and mosquito fish (*Gambusia affinis*). These species are associated with areas that support perennial flow and in manmade lakes and reservoirs such as Horseshoe Lake. A portion of the Mojave River which has perennial water is located approximately 350 feet from Line 1 Tower 162-2.

Amphibian. Several amphibians have been documented within the Mojave River and Mojave Desert including western toad (*Anaxyrus boreas*), arroyo toad (*A. californicus*), red-spotted toad (*A. punctatus*), Baja California treefrog (*Pseudacris hypochondriaca*), and American bullfrog (*Lithobates catesbeianus*). No amphibians were identified in the Project Area but are expected to occur at the Mojave River and other areas supporting suitable aquatic habitat. Because of climate and vegetation conditions, upland dispersal of juvenile, sub-adult, and adult amphibians from the Mojave River riparian corridor into the surrounding uplands in the Project Area is expected to be limited.

Reptiles. Reptiles were commonly observed during surveys in both disturbed and natural areas. Some of these include Great Basin fence lizard (*Sceloporus occidentalis longipes*), western side-blotched lizard (*Uta stansburiana elegans*), desert iguana (*Dipsosaurus dorsalis*), Great Basin collared lizard (*Crotaphytus bicinctores*), long-nosed leopard lizard (*Gambelia wislizenii*), and common chuckwalla (*Sauromalus ater*). Western zebra-tailed lizard (*Callisaurus draconoides rhodostictus*), southern desert horned lizard (*Phrynosoma platyrhinos calidiarum*), yellow-backed spiny lizard (*Sceloporus uniformis*), Great Basin whiptail (*Aspidoscelis tigris tigris*), red racer (*Coluber flagellum piceus*), and southwestern speckled rattlesnake (*Crotalus mitchellii pyrrhus*) were also observed.

Birds. A variety of birds are known to occur within the Project area and include resident breeding species, periodic migrants, and wintering species (eBird, 2025). Some of the common resident species that were observed during biological surveys include ash-throated flycatcher (*Myiarchus cinerascens*), black-throated sparrow (*Amphispiza bilineata*), cactus wren (*Campylorhynchus brunneicapillus*), mourning dove (*Zenaida macroura*), common raven (*Corvus corax*), ladder-backed woodpecker (*Dryobates scalaris*) northern flicker (*Colaptes auratus*), California quail (*Callipepla californica*), and greater roadrunner (*Geococcyx californianus*).

Migrant or wintering birds of the general region include, but not limited to, Brewer's sparrow (*Spizella breweri*), yellow-rumped warbler (*Dendroica coronata*), and white-crowned sparrow (*Zonotrichia leucophrys*). Common raptors in the region and include barn owl (*Tyto alba*), Cooper's hawk (*Accipiter cooperii*), great horned owl (*Bubo virginianus*), red-tailed hawk *(Buteo jamaicensis*), and turkey vulture (*Cathartes aura*). In addition, Cooper's hawk, western burrowing owl *(Athene cunicularia)*, golden eagle *(Aquila chrysaetos)*, barn owl, and great horned owl were observed during the surveys. Several exotic species including the house sparrow (*Passer domesticus*), and Eurasian-collared dove (*Streptopelia decaocto*) were also observed.

Mammals. The detection of mammals included direct observation and evidence of use, including tracks, scat, burrows, or other signs. Small mammals or their signs were commonly observed during most of the surveys primarily in the areas around the bases of large shrubs. Species detected or observed included round-tailed ground squirrel *(Xerospermophilus tereticaudus)*, white-tailed antelope squirrel (*Ammospermophilus leucurus*), kangaroo rat (*Dipodomys* spp.), and desert woodrat (*Neotoma lepida*). Mid-sized mammals included black-tailed jackrabbit (*Lepus californicus*), striped skunk (*Mephitis mephitis*) desert kit fox (*Vulpes macrotis arsipus*), American badger (*Taxidea taxus*), and coyote (*Canis latrans*). Large mammals including desert bighorn sheep (*Ovis canadensis*), mule deer (*Odocoileus hemionus*), and feral burro (*Equus asinus*) were detected during surveys. Desert bighorn sheep and burros were most

frequently detected in the Nevada and the eastern portion of the California segments. Mountain lions (*Puma concolor*) are also known from portions of the Project Area, particularly in the mountains near Barstow and Victorville where perennial water sources are present. Domestic animals including dog (*Canis familiaris*), horses (*Equus ferus caballus*) and other agricultural species were also detected close to developed areas.

Bats are expected to occur across the Mojave Desert, and foraging bats were detected on several occasions during the surveys. Bats are likely to forage over most of the Project Area and along with desert washes, where they prey on small insects, moths, and other invertebrates. These may include species designated as "special animals" by California Department of Fish and Wildlife (CDFW) and Nevada Department of Natural Heritage (NDNH). These include pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), hoary bat (*Lasiurus cinereus*), and Mexican free-tailed bat (*Tadarida brasiliensis*).

4.0 Special-Status Species, Vegetation, and Habitat

Plants or wildlife may be ranked as special-status species due to declining populations, vulnerability to habitat change, or restricted distributions. Certain species have been listed as threatened or endangered under state and/or federal Endangered Species Acts. Others have not been listed, but declining populations or habitat availability cause concern for their long-term viability. These appear on lists compiled by resource agencies or private conservation organizations. In this report, "special-status species" is used to include all plants and animals listed as candidate, proposed, threatened, or endangered, plants listed as rare by the state, recognized by the BLM sensitive, or identified by the CDFW and the NDNH.

This section provides information on the sensitive vegetation types, and special-status plants and animals observed within the Project Area or those species that have been determined to have a potential to occur (Table 5 and Table 6). For this document, special-status species include the following designations:

- Listed, proposed for listing, or candidates for listing as threatened or endangered under the ESA,
- Listed, or candidates for listing as threatened or endangered under the CESA,
- Designated as sensitive by the California BLM (BLM, 2019 and 2023) and Nevada BLM (BLM, 2023),
- Designated as special status by CDFW (CDFW, 2025),
- Designated as special status by NDNH (NDNH, 2025),
- Plants assigned a California Rare Plant Rank (CRPR) by California Native Plant Society (CNPS),
- Plants listed as rare under the California Native Plant Protection Act,
- Plants protected under the Western Joshua Tree Conservation Act,
- Plants considered special-status species in local or regional plans, policies, or regulations (including DRECP).

4.1 Sensitive Natural Communities

Sensitive natural communities are communities with a limited distribution within the state, region, or county that are often vulnerable to the environmental effects of development. The presence of special-status species is not required for a community to be considered sensitive.

Sensitive vegetation communities are defined by CDFW (2010) as, "...communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects." More recently CDFW stated that sensitive natural communities with state ranks of S1–S3

(S1=critically imperiled; S2=imperiled; S3=vulnerable) should be addressed in the environmental review processes of CEQA and its equivalents (CDFW, 2025).

The literature review identified sensitive vegetation communities in the vicinity of the Project Area, including mesquite bosque and crucifixion thorn woodland (CDFW, 2024). However, neither community is present within the project ROW. During the surveys several sensitive natural communities were mapped in the Project Area including:

- Acton's and Virgin River brittlebush - net-veined goldeneye (S3 Vulnerable Ranking)
- Death Valley joint fir scrub (S3 Vulnerable Ranking)
- Fremont's smokebush – Nevada smokebush scrub (S3 Vulnerable Ranking)
- Joshua tree woodland (S3 Vulnerable Ranking)
- Nevada joint fir - Anderson's boxthorn - spiny hop sage scrub (S3S4 Vulnerable Ranking)

The DRECP also identifies "Special Vegetation Features" which refer to unique or ecologically significant plant-related elements that are of high conservation value because of their limited distribution, ecological function, or sensitivity to disturbance (CEC et al., 2015). These communities often include rare alliances and special features such as unique desert scrub alliances, riparian corridors, playas and ephemeral wetlands, rock outcrops and cliff habitats, aeolian sand transport systems, Joshua tree woodland, microphyll woodlands, carbon sequestration vegetation types, seeps and springs, and other climate refugia. Many of these features are found in the Vegetation Communities and Other Cover Types (Attachment A, Figure 6) and noted in the Jurisdictional Delineation (Psomas, 2023).

The Project Area intersects with many desert washes of various widths as described in the Jurisdictional Delineation. Other Special Vegetation Features in the Project Area include aeolian sand transport resources such as in the Mojave River south-east of Barstow, which could support Mohave fringe-toed lizard. Western Joshua tree occurs at the eastern edge of the Project near Victorville and Joshua tree woodlands are found throughout the ROW including the eastern edge of the Project Area. Climate refugia, which includes north facing slopes, elevational or hydrological refugia supporting desert plants, may be found in limited areas of the Project Area. Special Vegetation Features such as crucifixion thorn stands were not observed during the surveys. However, additional surveys are expected to occur in 2026 as guided in Special Vegetation Features LUPA-BIO-SVR-1 to LUPA-BIO- SVF-7.

4.2 Common Cacti and Yucca

Common cacti and yucca occur throughout the Project Area. The highest concentration of these species is located near the Clark Mountains. Other areas with high concentrations of cacti and or yucca occur in the McCullough Mountain Range, north of Turquoise Mountain, and northeast of Stoddard Ridge. In contrast, the density of common cacti or yucca was substantially lower or absent near the McCullough substation, east of Primm, near SR-127, the area east of Soda Mountain, portions of the ROW between I-15 and I-40, and in the vicinity of the Victorville Switching Station.

An estimate of cacti and yucca was conducted for each of the proposed disturbance areas using a rapid assessment method. The rapid assessment methodology consisted of a 10–15-minute period where the biologist collected notes on the species present and their relative density. This approach acknowledges that smaller, cryptic, or obscured individuals may have been underrepresented in the estimates. This process may also introduce sampling bias should large numbers of cacti be detected close to the survey transects which can skew data to overrepresent actual numbers. However, a comprehensive inventory of species and population counts will be conducted prior to the commencement of construction.

The species and estimated number of common cacti and yucca detected during the rapid assessment are described below.

▪ Cottontop (*Echinocactus polycephalus*)	7,576
▪ Englemann's hedgehog cactus (*Echinocerus engelmenii*)	11,545
▪ California barrel cactus (*Ferocactus cylindracius*)	10,019
▪ Common fishhook cactus (*Mammillaria tetrancistra*)	452
▪ Beavertail cactus (*Opuntia basilarias*)	10,234
▪ Desert prickly pear (*Opuntia phaeacantha*)	6
▪ Grizzly bear prickly pear (*Opuntia polyacantha*)	1,218
▪ Banana yucca (*Yucca baccata*)	26,112
▪ Eastern Joshua tree (*Yucca jaegeriana*)	28,838
▪ Mohave yucca (*Yucca schidigera*)	59,128
TOTAL	155,128

4.3 Special-Status Plants

Based upon a review of the literature, databases, and the completion of botanical surveys, a list of special-status plant species that are known or have the potential to occur in the Project Area and/or broader Study Area was compiled. The locations of special-status plants observed during 2021, 2024, 2025, and 2026 surveys were also recorded and mapped (Attachment A, Figure 7). Several of the special-status plants identified during the literature review have no potential to be present in the Project Area and were not considered in this BRTR. For example, the DRECP list of Covered species that are not included in this BRTR include alkali mariposa-lily (*Calochortus striatus*), Bakersfield cactus (*Opuntia basilaris var treleasei*), desert cymopterus (*Cymopterus deserticola*), little San Bernardino Mountains linanthus (*Linanthus maculatus*), Mojave tarplant (*Deinandra mohavensis*), Owens Valley checkerbloom (*Sidalcea covillei*), Parish's daisy (*Erigeron parishii*), and triple-ribbed milk-vetch (*Astragalus tricarinatus*).

Western Joshua tree (*Yucca brevifolia*), a state candidate for listing was observed during the surveys within the California segment of the ROW and blue diamond cholla (*Cylindropuntia multigeniculata*), a Nevada listed Critically Endangered Plant and BLM-designated Sensitive Plant was observed in the Nevada segment of the ROW. No other State or federally listed plants were observed or have the potential to occur in the Project Area. The following other special-status plant species were observed within the Project Area.

- Small-flowered androstephium (*Androstephium breviflorum*) CRPR 2B.2
- Mojave milkweed (*Asclepias nyctaginifolia*) BLM CA: S, CRPR 2B.1
- Clark Mountain agave (*Agave utahensis* var. *nevadensis*) BLM CA: S; CRPR 4.2
- Nevada onion (*Allium nevadense*) BLM CA: S, CRPR 2B.3
- Scaly cloak fern (*Astrolepis cochisensis* ssp. *cochisensis*) CRPR 2B.3
- Tidestrom's milkvetch (*Astragalus tidestromii*) CRPR 2B.2
- Black grama (*Bouteloua eriopoda*) CRPR 4.2
- Three-awned grama (*Bouteloua trifida*) CRPR 2B.3
- Purple-nerve cymopterus (*Cymopterus multinervatus*) CRPR 2B.2
- Harwood's eriastrum (*Eriastrum harwoodii*) BLM CA: S, CRPR 1B.2
- Clark Mountain buckwheat (*Eriogonum heermannii* var. *floccosum*) CRPR 4.3, NV: S1

- Desert pincushion (*Escobaria* (*=Coryphantha*) *chlorantha*) CRPR: 2B.1
- Parish's club-cholla (*Grusonia parishii*) CRPR 2B.2
- Ribbed cryptantha (*Johnstonella costata*) CRPR 4.3
- Polished/ elegant blazing star (*Mentzelia polita*) BLM CA & NV: S, CRPR 1B.2
- Creamy blazing star (*Mentzelia tridentata*) BLM CA: S, CRPR 1B.3
- Utah mortonia (*Mortonia utahensis*) CRPR 4.3
- Crowned/pygmy muilla (*Muilla coronata*) CRPR 4.2
- Cave evening-primrose (*Oenothera cavernae*) BLM NV: S, CRPR 1B.3
- Cespitose evening-primrose (*Oenothera cespitosa* ssp. c*rinite*) CRPR 4.2
- New York Mountains catseye (*Oreocarya* (=*Cryptantha) tumulosa*) CRPR 4.3
- White margined beardtongue (*Penstemon albomarginatus*) BLM CA & NV: S, CRPR 1B.1
- Rosy two-toned beardtongue (*Penstemon bicolor* ssp. *roseus*) BLM CA & NV: S, CRPR 1B.1
- Parish's phacelia (*Phacelia parishii*) BLM CA & NV: S, CRPR 1B.1
- Mojave fishhook cactus (*Sclerocactus polyancistrus*) NDH CY, CRPR 4.2
- Rusby's desert-mallow (*Sphaeralcea rusbyi* var. *eremicola*) BLM CA: S, CRPR 1B.2

Table 5 lists the remaining special-status plants that have been observed or that have a potential to occur in the Project Area.

Table 5. Special-Status Plant Occurrence Probabilities in the Project Area

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Acleisanthes nevadensis desert wing-fruit	Perennial herb; rocky slopes and shale outcrops in Joshua tree woodland and Mojavean desert scrub; about 2,600–3,800 ft. elev.; Kingston Range, southeast Inyo County to southwestern Utah, and northwestern Arizona.	Jun-Sep	FED: none BLM CA: none BLM NV: none CA: S1 NV: none CRPR: 2B.1	**High:** Suitable habitat present. This species has been documented near the intersection of I-15 and Kingston Road.	**High:** Suitable habitat is present. Not considered special-status in Nevada.
Acmispon argyraeus* var. *multicaulis Scrub lotus Also called *Lotus argyraeus* var. *multicaulis*	Perennial herb; granite or volcanic substrate, sometimes sandy flats within pinyon/juniper woodland; about 4,200-7,300 ft. elev.; within the New York Mountains in San Bernardino County to southern Nevada.	Apr-Jun	FED: none BLM CA: S BLM NV: S CA: S2 NV: S1 CRPR: 1B.3	**Low:** This species has been documented within the Clark Mountains approximately 10 miles south of Project Area. CNPS lists this species as endemic to California.	**Low:** Marginal habitat present. No verifiable records in the vicinity of Project Area.
Agave utahensis* var. *nevadensis Clark Mountain agave	Perennial herb or shrub; limestone or volcanic slopes and cliffs; Joshua tree woodland; about 2,900-5,200 ft. elev.; eastern desert mountains (Ivanpah and Clark Mountains, and Kingston range).	May-Jul	FED: none BLM CA: none BLM NV: S CA: S3 NV: S3 CRPR: 4.2	**Present:** Approximately 8,000 plants were observed during surveys within the Clark Mountains. Suitable habitat is present.	**Moderate:** Suitable habitat present. Records documented east of I-15. Outside known geographic range.
Ageratina herbacea Desert ageratina	Perennial herb.; rocky sites within pinyon/juniper woodland; about 5,000–6,700 ft. elev.; Clark, New York and Providence Mountains to Colorado, western Texas, and northern Mexico.	Jul-Oct	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present. Outside known elevation range.	**Low:** Outside the known elevation range for this species. Not considered special-status in Nevada.
Aliciella triodon Coyote gilia	Annual herb; open, sandy, or rocky areas within on flats and slopes, with blackbrush, Joshua tree woodland, sagebrush scrub, and juniper woodland; about 3,900–5,600 ft. elev.; eastern desert mountains (Clark Mountain Range) to Colorado and New Mexico.	Apr-Jun	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.2	**Low:** Marginally suitable habitat is present. Recorded Mojave National Preserve, greater than 10 miles from Project Area.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Allium atrorubens* var. *atrorubens Great Basin onion	Perennial herb; sandy or rocky soils in Joshua tree woodland, Mojavean desert scrub, pinyon, and juniper woodland; 3,935–7,595 ft. elev.; eastern Sierras of California east to western Utah.	May-Jun	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Not Likely to Occur:** Outside the known geographic range.	**Not Likely to Occur:** Outside the known geographic range. Not considered special-status in Nevada.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Allium nevadense Nevada onion	Perennial herb (bulb); sandy or gravelly slopes in desert mountains within pinyon/juniper woodland and Mojavean desert scrub; about 4,200–5,600 ft. elev.; desert mountains within San Bernardino and Inyo Counties to Oregon, Idaho, Colorado, and Arizona.	Apr-May	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.3	**Present:** Approximately 240 plants observed within the Project Area and buffer, east and west of the Clark Mountains.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Aloysia wrightii Wright's beebush	Perennial evergreen shrub; rocky limestone slopes and dry washes; occurs within Joshua tree woodland, and Pinyon and juniper woodland; about 2955 to 5220 ft. elev.; within San Bernadino and Riverside counties of California, southern Nevada, Arizona, Utah, and Texas and elsewhere.	Apr-Oct	FED: none BLM CA: none BLM NV: none CA: S4 NV: none CRPR: 4.3	**Present:** Approximately two plants observed within the Project Area located within the Clark Mountains.	**High:** Suitable habitat is present. Not considered special-status in Nevada.
Androstephium breviflorum Small-flowered androstephium	Perennial herb (bulb); open desert scrub, sandy to rocky soil within Mojavean desert scrub and desert dunes; about 300–5,300 ft. elev.; south Mojave Desert and north Sonoran Desert to western Colorado.	Mar-Apr	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.2	**Present:** Approximately 15 plants were observed in the Project Area in Ivanpah Valley and Clark Mountains.	**Present:** Two plants were observed within the buffer adjacent to Prison Road**.** Not considered special-status in Nevada.
Arctomecon merriamii White bear poppy	Perennial herb; rocky slopes, calcareous soil, loose shale, or sandy washes within chenopod scrub and Mojavean desert scrub; about 2,600–5,300 ft. elev.; northeast Mojave Desert within San Bernardino and Inyo Counties to southern Nevada.	Apr-May	FED: none BLM CA: none BLM NV: S CA: S3 NV: S3 CRPR: 2B.2	**Moderate:** Marginal habitat is present. Records Clark Mountains and north Halloran Springs.	**Moderate:** Marginally suitable habitat is present.
Asclepias nyctaginifolia Mojave milkweed	Perennial herb; arroyos and dry slopes within Mojavean desert scrub and pinyon/juniper woodland; about 3,300–5,600 ft. elev.; Mojave Desert in San Bernardino County to Nevada and New Mexico.	May-Jun	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.1	**Present:** Approximately 30 plants were observed within the Project Area in the Ivanpah Valley and east of the Clark Mountains.	**Moderate:** Suitable habitat is present. Not considered special-status in Nevada.
Astragalus bernardinus San Bernardino milk-vetch	Perennial herb; often on granitic or carbonate soils. Joshua tree and pinyon and juniper woodlands; California endemic; about 3,000–6,600 ft. elev.; occurs in two disjunct areas, one in the San Bernardino Mountains and adjacent areas in the Mojave Desert, and another in the New York and Ivanpah Mountains near the Nevada border.	Apr-Jun	FED: none BLM CA: S BLM NV: none CA: S3 NV: none CRPR: 1B.2	**Not Likely to Occur:** Outside the known geographic range for this species.	**Not Likely to Occur**: Outside known geographic range for this species.
Astragalus nyensis Nye milkvetch	Annual herb; occurs in gravelly, sand, and alkaline substrates within Mojavean desert	Apr-May	FED: None BLM CA: S	**Moderate:** Only known to occur within the Pahrump	**High:** Suitable habitat is present. Recorded west of

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	scrub; about 2590 - 2675 ft elev.; in California only known in Pahrump Valley;		BLM NV: S CA: S1 NV: S3 CRPR: 1B.1	Valley. Potential to occur is limited to California-Nevada border.	Primm, within 1 mile of Project Area.
Astragalus tidestromii Tidestrom's milkvetch	Perennial herb; washes in sandy or calcareous gravel, within Mojavean desert scrub; about 1,900–5,300 ft. elev.; Mojave Desert (Cushenbury Canyon) within San Bernardino and Inyo Counties to southern Nevada.	Apr-Jul	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.2	**Present:** Approximately 660 plants were observed in the Project Area and buffer, from Ivanpah Valley to north of Halloran Springs.	**Moderate:** Suitable habitat is present. Not considered special-status in Nevada.
Astrolepis cochisensis* ssp. *cochisensis Scaly cloak fern	Fern; limestone slopes, crevices in desert mountains within Joshua tree woodland and pinyon/juniper woodland; about 3,300–5,300 ft. elev.; Mojave Desert within San Bernardino County.	Apr-Oct	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Present:** Approximately 2,000 plants were observed within the Project Area and buffer, east and west of the Clark Mountains.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Bahia neomexicana Many-flowered bahia	Annual herb; dry, sandy soils, desert scrub, and pinyon/juniper woodland; about 4,900–5580 ft. elev.; desert mountains (Clark, New York Mountains) in Inyo and San Bernardino Counties to Colorado, Texas, and northern Mexico.	Sep-Oct	FED: none BLM CA: none BLM NV: none CA: S2S3 NV: none CRPR: 2B.3	**Not Likely to Occur:** Outside the known geographic and elevation range for this species.	**Not Likely to Occur:** Outside the known geographic and elevation range for this species.
Blepharidachne kingii King's eyelash grass	Perennial grass like herb; rocky benches and alluvial fans usually on limestone in pinyon/juniper woodland and Great Basin scrub; about 2,900-7,100 ft. elev.; eastern desert mountains in Inyo and San Bernardino Counties to Idaho, Nevada, and Utah.	May	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Low:** Suitable habitat is present. This species was previously identified north of the Clark Mountains within the Survey Area. Not observed during surveys.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Bouteloua eriopoda Black grama	Perennial grass, Joshua tree woodland, and pinyon/juniper woodland; about 2,900 – 6,200 ft. elev.; eastern desert mountains in San Bernardino County to Wyoming, Oklahoma, and northern Mexico.	May-Oct	FED: none BLM CA: none BLM NV: none CA: S4 NV: none CRPR: 4.2	**Present:** Four plants were observed within the buffer area, near the Clark Mountains.	**Moderate:** Suitable habitat is present. Not considered special-status in Nevada.
Bouteloua trifida Three-awned grama	Perennial grass; dry, rocky, generally calcareous slopes, crevices, washes within Mojavean desert scrub; about 600-5,300 ft. elev.; north and east Mojave Desert (mostly desert mountains) to Utah, Texas, and central Mexico.	May-Sep	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.3	**Present:** Approximately 2,680 plants were observed within the Project Area and buffer east of the Clark Mountains.	**Moderate:** Suitable habitat is present. Not considered special-status in Nevada.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Canbya candida White pygmy-poppy	Annual herb, gravelly; sandy, granitic places within Joshua tree woodland, Mojavean desert scrub and pinyon/juniper woodland; about 2,000-4,400 ft. elev.; western Mojave Desert and adjacent Sierra Nevada foothills.	Mar-Jun	FED: none BLM CA: none BLM NV: none CA: S3S4 NV: none CRPR: 4.2	**Moderate:** Suitable habitat is present. Historic records for this species occur in the Barstow and Victorville area.	**Not Likely to Occur**: Outside the known geographic range. Not considered special-status in Nevada.
Castela emoryi Emory's crucifixion thorn	Perennial shrub; fine sand or silt, slopes, washes, plains, non-saline bottomland within Mojavean desert scrub, Sonoran Desert scrub and playas; about 350–2,100 ft. elev.; California deserts to Arizona Baja and Sonora.	Jun-Jul	FED: none BLM CA: none BLM NV: none CA: S2S3 NV: None CRPR: 2B.2	**High:** Suitable habitat is present. This species has been documented greater than 10 miles from the Project Area. Detected at reference site over 25 miles from the Project Area.	**Not Likely to Occur:** Outside the known geographic range. Not considered special-status in Nevada.
Chorizanthe spinosa Mojave spineflower	Annual herb; desert shrubland, Chenopod scrub, Joshua Tree Woodland, Mojavean desert scrub and playas; sea level to about 4,300 ft. elev.; Kern, LA, and San Bernardino Counties; W Mojave Desert, east to Rabbit Springs	Mar-Jul	Fed: None BLM CA: none BLM NV: none CA: S4 NV: none CRPR: 4.2	**Moderate:** Suitable habitat is present within the Project Area at the eastern edge of range near Barstow. Approximately 10 plants were observed at the Kramer Junction reference site.	**Not Likely to Occur:** Outside the known geographic range. Not considered special-status in Nevada.
Cirsium arizonicum **var. *tenuisectum*** Desert mountain thistle	Perennial herb; washes, rocky slopes, disturbed areas; often on roadsides within Joshua tree woodland, Mojavean desert scrub and pinyon/juniper woodland; about 5,200-7600 ft. elev.; Mojave Desert mountains (Clark and New York Mountains) to southern Nevada.	Jun-Nov	FED: none BLM CA: none BLM NV: S CA: S2 NV: S2 CRPR: 1B.2	**Low:** Marginally suitable habitat is present. An occurrence was recorded within the Mojave National Preserve, over 10 miles from the Project Area.	**Low:** Marginally suitable habitat is present.
Cylindropuntia multigeniculata Blue diamond cholla	Perennial herb (stem succulent); rocky limestone, basalt, granite, and rhyolite substrates between in desert scrub communities; about 3,400-4,600 ft. elev.; in the northeastern Mojave Desert of southern Nevada and northwestern Arizona.	May	FED: none BLM CA: none BLM NV: S CA: none NV: S2, CE CRPR: none	**Not Likely to Occur**: Outside the known geographic range.	**Present:** Eight plants observed in the Project buffer area in the McCullough Mountain range.
Cymopterus deserticola Desert cymopterus	Perennial herb; sandy areas within Joshua tree woodland and Mojavean desert scrub; about 2,065 – 4,920 ft. elev. Restricted to the Mojave Desert.	Mar-May	FED: none BLM CA: S BLM NV: none CA: none NV: none CA: S2 NV: S2 CRPR: 1B.2	**Not Likely to Occur:** Outside of the known geographic range.	**Not Likely to Occur:** Outside the known geographic range.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
			DRECP: C		
Cymopterus gilmanii Gilman's cymopterus/Gilman spring parsley	Perennial herb; limestone, gypsum slopes within Mojavean desert scrub; about 2,900-6,600 ft. elev.; desert mountains of Inyo and San Bernardino Counties to Nevada.	Apr-May	FED: none BLM CA: none BLM NV: none CA: S2 NV: S2S3 CRPR: 2B.3	**High:** Suitable habitat is present. An occurrence was documented in the Clark Mountains.	**High:** Suitable habitat present. Records occur within 1 mile of the Project Area.
Cymopterus multinervatus Purple-nerve cymopterus	Perennial herb; sandy and rocky slopes within Mojavean desert scrub and pinyon/juniper woodland; about 2,066-5,905 ft. elev.; Mojave Desert in Inyo, Riverside and San Bernardino Counties to Utah and New Mexico.	Mar-Apr	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.2	**Present:** Approximately 85 plants were observed in the Project Area and buffer south of Shadow Mountain and east of Kinston Road.	**Moderate:** Suitable habitat is present. Not considered special-status in Nevada.
Diplacus mohavensis Mojave monkeyflower	Annual herb; dry sandy or rocky washes along the Mojave River within Joshua tree woodland and Mojavean desert scrub; about 1,900-3,300 ft. elev.; Mojave Desert in western San Bernardino County.	Apr-Jun	FED: none BLM CA: S BLM NV: none CA: S2 NV: none CRPR: 1B.2 DRECP: C	**High:** Suitable habitat is present. This species has been documented near Barstow, Newberry Mountains, Stoddard Valley, and Sidewinder Valley.	**Not Likely to Occur:** Suitable habitat is present but the Project Area occurs outside the known range. Not considered special-status in Nevada.
Elymus salina Salina Pass wild rye	Perennial grass like herb; rocky sites on north-facing slopes of pinyon/juniper woodland; about 4,400-9,400 ft. elev.; desert mountains within Inyo and San Bernardino Counties to Idaho, western Colorado, and northern Arizona.	Jun-Aug	FED: none BLM CA: none BLM NV: none CA: S2S3 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present. An occurrence was documented in the Clark Mountains.	**Low:** Marginally suitable habitat is present.
Enceliopsis nudicaluis* var. *nudicaulis Naked stemmed daisy	Perennial herb or shrub; found in Great Basin and Mojavean desert scrub in areas of rocky volcanic and carbonate substrate on stony hillsides and canyons; about 4365 to 6595 ft. elev.; found in California and Nevada and elsewhere in western North America.	April-May	FED: none BLM CA: BLM NV: none CA: S3 NV: none CRPR: 4.3	**High:** Suitable habitat is present. Occurrences documented in the Clark Mountains and Mesquite Wilderness.	**Present:** Approximately 20 plants observed during 2026 surveys in the buffer area near the California-Nevada border. Not considered special-status in Nevada.
Enneapogon desvauxii Nine-awned pappus grass	Perennial grass like herb; rocky slopes, crevices in decomposed granite, or in gravelly limestone soils within pinyon/ juniper woodland; about 4,100-6,000 ft. elev.; eastern Mojave Desert in San Bernardino County to Colorado, western Texas, and northern Mexico.	Aug-Sep	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.2	**High:** Suitable habitat is present. This species has been documented in the Clark Mountain area.	**High:** Marginally suitable habitat is present. Not considered special-status in Nevada.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Ephedra funerea Death Valley Mormon tea	Shrub; dry rocky slopes in creosote bush scrub community; about 1345 to 6102 ft. elev.; found in California, Nevada and Arizona in the Mojave Desert and desert mountains.	Mar-Apr (cones present)	FED: none BLM CA: none BLM NV: none CA: none NV: S2 CRPR: none	**High:** Suitable habitat is present. This species has been documented in the Ivanpah Valley, Shadow Valley, and Newberry Springs.	**High:** Suitable habitat is present. Occurrences were recorded in the McCullough range, within 1 mile of the Project Area.
Eremothera boothii* ssp. *boothii Booth's evening-primrose	Annual herb; sandy flats, steep loose slopes, Joshua tree woodland, and pinyon/juniper woodlands; about 2,900-7,900 ft. elev.; foothills of mountains of southern California to Washington and northwestern Arizona.	Jun-Aug	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.3	**Moderate:** Suitable habitat is present. This species has been documented in Victorville, along I-15 near Baker, and within the Mojave National Preserve.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Eriastrum harwoodii Harwood's eriastrum	Annual herb; sandy soils and desert dunes in creosote-bush scrub; about 410 – 3,000 ft. elev.; in the Mojave and Sonoran Desert, California.	May-Jun	FED: none BLM CA: S BLM NV: none CA: S2 NV: none CRPR: 1B.2	**High:** Suitable habitat is present.	**Not Likely to Occur:** Suitable habitat is present, but the Project Area occurs outside the known range. Not considered special-status in Nevada.
Erigeron uncialis* var. *uncialis Limestone daisy	Perennial herb; rocky slopes, crevices of limestone cliffs within Great Basin scrub, subalpine coniferous forest, and pinyon/juniper woodland; about 6,900-9,500 ft. elev.; Mojave Desert in Inyo and San Bernardino Counties to central Nevada.	May-Jul	FED: none BLM CA: S BLM NV: none CA: S2 NV: S1, CRPR: 1B.2	**Not Likely to Occur:** The Project Area occurs outside the known elevation range. Historic records occur near the Clark Mountains.	**Not Likely to Occur:** The Project Area occurs outside the known geographic range.
Eriogonum bifurcatum Forked buckwheat/ Pahrump Valley buckwheat	Annual herb; rocky slopes, sandy areas, saline flats and rolling hills with fourwing saltbush and shadscale; about 1,900-2,600 ft. elev.; Mojave Desert in southern Inyo and northeast San Bernardino Counties to southern Nevada.	May-Jun	FED: none BLM CA: S BLM NV: S CA: S3 NV: S2 CRPR: 1B.2	**Low:** Marginally suitable habitat is present. Project Area occurs south of the known geographic range for this species.	**Low:** Marginally suitable habitat is present.
Eriogonum heermannii* var. *floccosum Clark Mountain buckwheat	Shrub; carbonate soils within pinyon/juniper woodland; about 2,955 – 7,875 ft. elev.; desert mountains in San Bernardino to northwestern Arizona and southern Nevada.	Aug-Oct	FED: none BLM CA: none BLM NV: none CA: S4 NV: S1 CRPR: 4.3	**Present:** Approximately 94 plants were observed in the Project Area and buffer in the Clark Mountains.	**High:** Marginally suitable habitat is present. Records were documents within 1 mile of the Project Area.
Eriogonum mensicola Pinyon Mesa buckwheat	Perennial herb; rocky slopes within pinyon/juniper woodland, Great Basin scrub and upper montane coniferous forest; about 5,900-8,900 ft. elev.; Inyo Mountains and Panamint, Coso Ranges of southern California to southwestern Nevada.	Jul-Sep	FED: none BLM CA: S BLM NV: none CA: S4 NV: S2 CRPR: 1B.3	**Not Likely to Occur:** Outside the known geographic range.	**Not Likely to Occur:** Outside the known geographic range.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Eriogonum umbellatum* var. *juniporinum Juniper sulphur-flowered buckwheat	Perennial herb; sandy or gravelly soils within pinyon/juniper woodland and Mojavean desert scrub.; about 4,300-7,500 ft. elev.; desert mountains in eastern San Bernardino County to Nevada, southwestern Utah, northwestern Arizona.	July-Oct	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.3	**Low:** Marginal suitable habitat is present.	**Low:** Marginally suitable habitat is present. Not considered special-status in Nevada.
Erioneuron pilosum Hairy erioneuron	Perennial grass like herb; rocky or gravelly places within pinyon/juniper woodland; about 4,200-6,600 ft. elev.; eastern Mojave Desert in San Bernardino County to Kansas, Texas, and Mexico.	May-Jun	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present.	**Low:** Marginally suitable habitat is present. Not considered special-status in Nevada.
Eriophyllum mohavense Barstow woolly sunflower	Annual herb; open, silty, or sandy areas with saltbush scrub, or creosote bush scrub, barren ridges, or margins of playas; about 1,600-2,600 ft. elev.; Mojave Desert in Kern, Los Angeles, and San Bernardino Counties.	April-May	FED: none BLM CA: S BLM NV: none CA: S2 NV: none CRPR: 1B.2 DRECP: C	**Moderate:** Suitable habitat is present. Occurrences documented within 5 miles of the Project Area. Approximately 20 plants observed at the Kramer Junction reference site.	**Not Likely to Occur:** Outside the known range. Not considered special-status in Nevada.
Escobaria (=Coryphantha) chlorantha Desert pincushion	Perennial herb (stem succulent); calcareous substrates, rocky and gravelly sites within Mojavean desert scrub, Joshua tree woodland, and pinyon/juniper woodland; about 900-7,900 ft. elev.; Mojave Desert in eastern San Bernardino County to southwestern Utah and northwestern Arizona.	Apr-Sep	FED: none BLM CA: none BLM NV: none CA: S3 NV: S2S3; CY CRPR: 2B.1	**Present:** Approximately 5,800 plants were observed in the Project Area and buffer, extending from California to the Nevada border and north to the Hollow Hills Wilderness area.	**Present:** Approximately 160 plants were observed in Project Area and buffer, extending from I-15 to California-Nevada border.
Escobaria (=Coryphantha) vivipara* var. *rosea Viviparous foxtail cactus	Perennial herb (stem succulent); gravelly limestone or volcanic slopes and brushy hillsides within Mojavean desert scrub and pinyon/juniper woodland; about 4,900-8,900 ft. elev.; desert mountains in northeast San Bernardino County to southern Nevada and northwestern Arizona.	May-Jun	FED: none BLM CA: none BLM NV: none CA: S1 NV: none CRPR: 2B.2	**Present:** Approximately 24 plants were observed in the Project Area and buffer, north of Halloran Springs.	**High:** Suitable habitat is present. Not considered special-status in Nevada.
Euphorbia abramsiana Abrams' spurge	Annual herb; sandy flats, playas, alluvial flats, and broad sandy washes; about 2460 to 7515 elev.; geographic range is northern Sonora and Baja California (Mexico), western Arizona, and southeastern California	Sep-Nov	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.2	**Low:** Suitable habitat is present.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Euphorbia exstipulata* var. *exstipulata Clark Mountain spurge	Annual herb; rocky slopes within Mojavean desert scrub; about 5,900-6,600 ft. elev.; desert mountains (Clark Mountain Range and New York Mountains) in San Bernardino County.	Sep-Oct	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.1	**Low:** Marginally suitable habitat is present. This species has been documented in the Clark Mountains and within the Mojave National Preserve.	**Low:** Marginally suitable habitat is present. Not considered special-status in Nevada.
***Ferocactus acanthodes* subsp. *lecontei* (=*Ferocactus cylindraceus* var. *lecontei*)** LeConte's barrel cactus	Shrub, rocky hillsides, alluvial fans and wash margins, sandy flats in creosote bush scrub, Joshua tree woodland communities; About 80 to 5645 ft. elev.; Mojave Desert, Colorado Desert, in California, Clark County in Nevada, Utah and Arizona.	Apr-May	FED: none BLM CA: none BLM NV: none CA: none NV: S4, CY CRPR: none	**Low:** Suitable habitat is present. Not considered special-status in California.	**Moderate:** Suitable habitat is present. Historic occurrences have been documented within 1 mile of Project Area.
Frasera albomarginata* var. *induta Clark Mountain green-gentian	Perennial herb; dry, open woodland within pinyon/juniper woodland; about 4,900-7,200 ft. elev.; desert mountains (Clark Mountains) in San Bernardino County to southern Nevada.	May-Jul	FED: none BLM CA: none BLM NV: S CA: S1 NV: S2 CRPR: 1B.2	**Low:** Marginally suitable habitat is present.	**Low:** Marginally suitable habitat is present.
Galium proliferum Desert bedstraw	Annual herb; rocky banks, limestone ledges within Joshua tree woodland, Mojavean desert scrub, and pinyon/juniper woodland; about 3,600-4,700 ft. elev.; desert mountains in San Bernardino County to Arizona and Mexico.	Apr-May	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.2	**Present:** Approximately 500 plants were observed in the Project Area and buffer in the Clark Mountains.	**Moderate:** Suitable habitat is present. Not considered special-status in Nevada.
Galium wrightii Wright's bedstraw	Perennial herb; dry, open woodland within pinyon/juniper woodland; about 4,900-7,200 ft. elev.; desert mountains (Clark Mountain Range) in San Bernardino County to southern Nevada.	Jun-Oct	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.3	**Low:** Marginal suitable habitat is present.	**Low:** Marginal suitable habitat is present. The Project Area occurs outside known elevation range. Not considered special-status in Nevada.
Glossopetalon pungens Pungent glossopetalon	Shrub; limestone cliffs within pinyon/juniper woodland and chaparral; about 5,600-6,800 ft. elev.; desert mountains (Clark Mountain Range) in San Bernardino County to southern Nevada.	May-Jun	FED: none BLM CA: S BLM NV: none CA: S1 NV: S2 CRPR: 1B.2	**Low:** Marginally suitable habitat is present.	**Not Likely to Occur:** No suitable habitat is present. Outside the known geographic range.
Grimmia vaginulata Vaginulate grimmia	Moss; openings; rocky, boulder and rock walls, carbonate soils within chaparral; about 2,200-3,700 ft. elev.; desert	n/a	FED: none BLM CA: S BLM NV: none	**Not Likely to Occur:** No suitable habitat is present.	**Not Likely to Occur:** No suitable habitat is present. Outside the known geographic

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	mountains in eastern San Bernardino County.		CA: S1 NV: none CRPR: 1B.1	Outside the known geographic range.	range. Not considered special-status in Nevada.
Grusonia parishii Parish's club-cholla	Shrub (stem succulent); sandy, gravelly flats generally in Mojavean desert scrub, Sonoran Desert scrub and Joshua tree woodland; about 1,000-3,900 ft. elev.; desert mountains in Riverside and San Bernardino Counties to southern Nevada and western Arizona.	May-Jun	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.2	**Present:** Approximately 44 plants were observed in the Ivanpah Valley.	**High:** Suitable habitat is present. Not considered special-status in Nevada.
Hymenopappus filifolius* var. *eriopodus Hairy-podded fine-leaf hymenopappus	Perennial herb; limestone soils within pinyon/juniper woodland; about 5,200-5,600 ft. elev.; desert mountains (Clark Mountains and New York Mountains) in San Bernardino County to southern Nevada and southwestern Utah.	May-Jun	FED: none BLM CA: none BLM NV: none CA: S2S3 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present. Potentially outside the known elevation range.	**Low:** Marginally suitable habitat is present. Potentially outside of known geographic range. Not considered special-status in Nevada.
Ivesia jaegeri Jaeger's ivesia	Perennial herb; limestone crevices within pinyon/juniper woodland and upper montane coniferous forest; about 6,200-7,600 ft. elev.; desert mountains (Clark Mountains) in San Bernardino County to southwestern Nevada.	Jun-Jul	FED: none BLM CA: S BLM NV: S CA: S1 NV: S2 CRPR: 1B.3	**Low:** Marginally suitable habitat is present. Potentially outside the known elevation range.	**Low:** Marginally suitable habitat is present. Potentially outside of the known elevation range.
Jaffueliobryum wrightii Wright's jaffueliobryum moss	Moss; openings; dry openings, rock crevices, carbonate soils within alpine dwarf scrub, pinyon/juniper woodland, and Mojavean desert scrub; about 500-8,600 ft. elev.; desert mountains in eastern San Bernardino County to southern Nevada.	n/a	FED: none BLM CA: none BLM NV: none CA: S2S3 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Johnstonella costata Ribbed cryptantha	Annual herb; sandy areas within sandy desert dunes, Mojavean desert scrub and Sonoran Desert scrub; about -200-1,600 ft. elev.; eastern Mojave Desert and Sonoran Desert to southern Nevada, Arizona, and Baja California.	Feb-May	FED: none BLM CA: none BLM NV: none CA: S4 NV: none CRPR: 4.3	**Present:** Approximately 100 plants observed in the buffer areas north of Baker. Approximately 1,000 plants were documented in the general area.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Juncus nodosus Knotted rush	Perennial grass like herb; restricted to seeps, streambanks, lakeshores, wet meadows; below 5,600 ft. elev.; Inyo and San Bernardino Counties to Alaska, Texas, Virginia, Maine, eastern Canada, and Mexico.	Jul-Sep	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present.	**Not Likely to Occur:** No suitable habitat is present. Not considered special-status in Nevada.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Linanthus arenicola Dune linanthus/sand linanthus	Annual herb; sand dunes; in Creosote Bush Scrub and Joshua Tree Woodland; about 1705 to 4625 ft. elev.; California and Nevada.	Mar-Apr	FED: none BLM CA: none BLM NV: none CA: none NV: S3 CRPR: none	**Not Likely to Occur:** The Project Area occurs outside the known range. Not considered special-status in California.	**High:** Dependent on dune habitat. Found in sandy areas near dry lakes. Occurrences have been documented within 1 mile of Project Area.
Linum puberulum Plains flax	Annual herb; rocky, sandy areas within pinyon/juniper woodland, Great Basin scrub, Joshua tree woodland, and Mojavean desert scrub.; about 3,200-6,600 ft. elev.; desert mountains in San Bernardino County to Wyoming, Nebraska, Texas, and northern Mexico.	May-Jul	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Menodora scabra* var. *scabra Rough menodora	Shrub; rocky or sandy soils within pinyon/juniper woodland, Joshua tree woodland, and Mojavean desert scrub; about 3,200-6,800 ft. elev.; desert mountains (Clark, Eagle, New York Mountains) in San Bernardino County to New Mexico and northern Mexico.	May-Jun	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.3	**Low:** Marginal suitable habitat is present. This species has been documented within 5 miles of the Project Area in the Mojave National Preserve including the Clark Mountains.	**Low:** Marginally suitable habitat is present. Not considered special-status in Nevada.
Menodora spinescens* var. *mohavensis Mojave menodra	Shrub, Mojavean desert scrub; rocky hillsides, canyons, slopes; about 2265-6560 ft. elev.; desert mountains (Ord, Rodman, and Newberry Mountains) in San Bernardino County.	Apr-May	FED: none BLM CA: S BLM NV: none CA: S2 NV: none CRPR: 1B.2	**Present:** Approximately 15 plants were observed in the Project Area between I-40 and SR-247.	**Not Likely to Occur:** The Project Area occurs outside of the known range. Not considered special-status in Nevada.
Mentzelia polita elegant blazing star/polished blazing star	Annual herb; washes, limestone, white gypsum-rich soils within Mojavean desert scrub; about 3,900-5,000 ft. elev.; desert mountains (Clark Mountain Range) in Inyo and San Bernardino Counties to southern Nevada.	May-Jun	FED: none BLM CA: S BLM NV: S CA: S2? NV: S2, T CRPR: 1B.2	**Present:** Approximately 130 plants were observed in the Project Area and buffer, mostly near the Clark Mountains. A few plants were documented west of Kingston Road.	**High:** Suitable habitat is present. Recorded within 1 mile of the Project Area.
Mentzelia pterosperma wing-seed blazing star	Annual herb; white gypsum-rich soils within Mojavean desert scrub; about 3,200-4,000 ft. elev.; Mojave Desert in Inyo and San Bernardino Counties to Colorado and northwestern Arizona.	Apr-Jun	FED: none BLM CA: none BLM NV: none CA: S1S2 NV: none CRPR: 2B.2	**Low:** Marginally suitable habitat is present.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Mentzelia puberula	Perennial herb; about 295-4200 feet elevation; habitat Mojavean desert scrub;	Mar-May	FED: none BLM CA: none	**Moderate:** Suitable habitat is present.	**Moderate:** Suitable habitat is present.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Argus blazing star/Darlington's blazing star	bases of steep cliffs in crevices granite, limestone, steep gravelly and sand slopes, sandy washes. Found in Imperial, Riverside and San Bernardino CA and Nevada.		BLM NV: none CA: S2 NV: S2 CRPR: 2B.2		
Mentzelia tricuspis Spiny-hair blazing star	Annual herb; sandy or gravel soil, slopes, and washes of desert mountain; Mojavean desert scrub, about 490-4200 ft. elev.; likely that it is restricted to the Mojave Desert in California, range includes Nevada and Utah.	Mar-May	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.1	**Low:** Marginally suitable habitat is present. There are historic records of this species near Barstow.	**Moderate:** Suitable habitat is present. Not considered special-status in Nevada.
Mentzelia tridentata Creamy blazing star	Annual herb; creosote-bush scrub; about 2,200-4,300 ft. elev.; southern California deserts to Colorado and northwestern Arizona.	Apr-May	FED: none BLM CA: S BLM NV: none CA: S3 NV: none CRPR: 1B.3	**Present:** Approximately 40 plants were observed in the Project Area south of Barstow. Recorded in the general area of Barstow and south towards Lucerne Valley.	**Not Likely to Occur:** Suitable habitat is present. The Project Area occurs outside the known range. Not considered special-status in Nevada.
Monardella eremicola Clark Mountain monardella	Annual herb; limestone (occasionally granite) outcrops, canyons, slopes, wash margins within pinyon/juniper woodland and desert riparian scrub; about 4,900-6,900 ft. elev.; desert mountains (Clark Mountain Range, New York Mountains, Kingston Range) in San Bernardino County.	Jun-Aug	FED: none BLM CA: S BLM NV: none CA: S3 NV: none CRPR: 1B.3	**Low:** Marginally suitable habitat is present. Known only in the Clark and Kingston Mountains.	**Not Likely to Occur:** Marginally suitable habitat is present. The Project Area occurs outside the known range. Not considered special-status in Nevada.
Mortonia utahensis Utah mortonia	Shrub; limestone slopes, canyon bottoms within Joshua tree woodland, Mojavean desert scrub and pinyon/juniper woodland; about 2,495 – 6,890 ft. elev.; northern Mojave Desert in Inyo and San Bernardino Counties to southwestern Utah.	Mar-May	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 4.3	**Present:** Over 1,000 plants were observed in the Project Area and buffer in the Ivanpah Valley and the eastern edge of the Clark Mountains.	**High:** Suitable habitat is present. Records have been documented north of Primm and south of Jean. Not considered a special-status in Nevada.
Muhlenbergia arsenei Tough muhly	Perennial grass like herb; limestone rock outcrops, slopes within pinyon/juniper woodland; about 4,500-6,100 ft. elev.; desert mountains (Clark Mountain Range) in San Bernardino County to southeastern Utah, northern New Mexico, and northern Baja California.	Aug-Sep	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present.	**Low:** Marginally suitable habitat is present. Not considered special-status in Nevada.
Muhlenbergia fragilis Delicate muhly	Perennial grass like herb; limestone rock outcrops, slopes within pinyon/juniper woodland; about 5250 ft. elev.; desert mountains (Clark Mountain Range, New	Oct	FED: none BLM CA: none BLM NV: none CA: S2 NV: S1	**Low:** Marginally suitable habitat is present.	**Low:** Marginally suitable habitat is present. Based on occurrence data the Project Area occurs outside the known range.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	York Mountains) in San Bernardino County to western Texas and Mexico.		CRPR: 2B.3		
Munroa squarrosa False buffalo-grass	Annual grass like herb; open, sandy, gravelly, or rocky places within pinyon/juniper woodland; about 4,900-5,900 ft. elev.; desert mountains (Clark Mountain Range) in San Bernardino County to Great Plains, Texas, and northern Mexico.	Aug-Oct	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.2	**Low:** Marginally suitable habitat is present.	**Low:** Marginally suitable habitat is present. Not considered special-status in Nevada.
Muilla coronata Crowned/pygmy muilla	Perennial bulbiferous herb; loam, sandy loam in creosote bush scrub, Mojavean desert scrub, pinyon-juniper woodland, and Joshua tree woodland; about 2,200-6,430 ft. elev.; Mojave Desert region of eastern California and southwestern Nevada.	Mar-Apr	FED: none BLM CA: none BLM NV: none CA: S3 NV: S1 CRPR: 4.2	**Present:** Approximately 10 plants were observed in the Project Area west of Shadow Mountain.	**High:** Suitable habitat is present.
Oenothera cavernae Cave evening-primrose	Perennial herb; gravelly, often calcareous substrate within Great Basin scrub, Joshua tree woodland, and Mojavean desert scrub; about 6,200-7,600 ft. elev.; desert mountains (Clark Mountains, also base of range in Ivanpah Valley) in San Bernardino County to southern Nevada, southern Utah, and northern Arizona.	Apr-May	FED: none BLM CA: none BLM NV: S CA: S1 NV: S1S2 CRPR: 2B.1	**Present:** Approximately 65 plants were observed in the Project Area and buffer in the Ivanpah Valley and the Clark Mountains.	**Low:** Suitable habitat is present.
Oenothera cespitosa* ssp. *crinita Caespitose evening-primrose	Perennial rhizomatous herb; Pinyon and juniper woodland, Sonoran Desert scrub; about 3,700 to 10,900 ft. elev.; San Bernardino, Lassen, Inyo Counties; California, Nevada, Arizona, and Utah.	Jun-Sep	FED: none BLM CA: none BLM NV: none CA: S4 NV: none CRPR: 4.2	**Present:** Approximately 360 plants were observed in Project Area and buffer in the Clark Mountains.	**Not Likely to Occur**: Suitable habitat is present. Not considered special-status in Nevada.
Opuntia basilaris* var. *brachyclada Short-joint beavertail	Perennial stem; Chaparral, Joshua tree woodland, Mojavean desert scrub, Pinyon, and juniper woodland; 1395 - 5905 feet elev.; Los Angeles and San Bernardino counties.	Apr-Jun (Aug)	FED: none BLM CA: S BLM NV: none CA: S3 NV: none CRPR: 1B.2	**Moderate:** Suitable habitat is present. Outside the known range.	**Not Likely to Occur**: The Project Area occurs outside the known geographic range. Not considered special-status in Nevada.
Opuntia xcurvispina Curved-spine beavertail	Perennial stem, Sandy, gravelly, rock soils, washes; Creosote-bursage, Mojavean desert scrub, and Pinyon and juniper woodland; 3250to 4595 ft. elev.; San Bernardino County to Nevada and Arizona.	Apr-Jun	FED: none BLM CA: none BLM NV: none CA: none NV: SY, S1 CRPR: 2B.2	**Present:** Approximately 12 plants were observed in the Clark Mountains and north of the Hollow Hills Wilderness area.	**High:** Known to occur near Searchlight and the Las Vegas region.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Oreocarya (=Cryptantha) tumulosa New York Mountains catseye	Perennial herb; limestone, occasionally granitic gravel, or clay soils, generally pinyon/juniper woodland; about 4,600-6,900 ft. elev.; desert mountains of Inyo and San Bernardino Counties to southwest Nevada.	Apr-June	FED: none BLM CA: none BLM NV: none CA: S4 NV: S2, W CRPR: 4.3	**Present:** Approximately 970 plants were observed in the Project Area and buffer near the Clark Mountains.	**Moderate:** Suitable habitat is present. Historic records were documented within the McCullough Range.
Pediomelum castoreum Beaver dam breadroot	Perennial herb; sandy soils; washes and roadcuts. within Joshua tree woodland and Mojavean desert scrub; below 5,700 ft. elev.; Mojave Desert in San Bernardino County to Nevada and Arizona.	Apr-May	FED: none BLM CA: S BLM NV: S CA: S2 NV: S2 CRPR: 1B.2	**Moderate:** Suitable habitat is present.	**Low:** Marginal suitable habitat is present.
Penstemon albomarginatus White margined beardtongue	Perennial herb; deep stabilized desert sand, in washes and along roadsides within Mojavean desert scrub and desert dunes; about 1,800-3,510 ft. elev.; San Bernardino County to Nevada and Arizona.	Mar-May	FED: none BLM CA: S BLM NV: S CA: S1 NV: S2 CRPR: 1B.1	**High:** Suitable habitat is present.	**Present:** Approximately 35 plants were observed at various locations along Prison Road near Jean and one plant was observed along the transmission corridor. Multiple records were documented within 1 mile of the Project Area.
Penstemon bicolor* ssp. *bicolor Yellow two-tone beardtongue	Perennial herb; calcareous or carbonate soils in washes, roadsides, rock crevices, outcrops within creosote-bursage, blackbrush, mixed-shrub, and lower juniper communities; about 2,500-5,500 ft. elev.; Mojave Desert of the southern Basin and Range Province of Nevada	May	FED: none BLM CA: none BLM NV: S CA: none NV: S2 CRPR: none	**Present**: One plant was observed in the Project Area in the Clark Mountains.	**High:** Marginally suitable habitat is present. Historic records were documented within 1 mile of the Project Area.
Penstemon bicolor* ssp. *roseus Rosy two-toned beardtongue	Perennial herb; rocky or gravelly sites within Joshua tree woodland and Mojavean desert scrub communities about 2,800-4,900 ft. elevation in the Clark Mountains in San Bernardino County and southern Nevada.	May	FED: none BLM CA: S BLM NV: S CA: S3 NV: S3 CRPR: 1B.1	**Present:** Plants were observed in the Ivanpah Valley west of the Clark Mountains.	**Present:** Plants were observed in the McCullough Mountains. Records were documented within 1 mile of the Project Area.
Penstemon thompsoniae Thompson's beardtongue	Perennial herb; white calcareous soil in pinyon/juniper woodland; about 5,500-6,300 ft. elev.; desert mountains (Clark Mountains, New York Mountains) in San Bernardino County to Utah and Arizona.	May-Jun	FED: none BLM CA: none BLM NV: none CA: S1 NV: S4 CRPR: 2B.3	**Low:** Marginally suitable habitat is present.	**Not Likely to Occur:** The Project Area occurs outside of the known geographic range.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Penstemon utahensis Utah beardtongue	Perennial herb; white calcareous soil in pinyon/juniper woodland; about 3,900-5,900 ft. elev.; desert mountains (Kingston Range, New York Mountains) in San Bernardino County to Utah and Arizona.	Apr-May	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Low:** Marginal habitat is present. This species has been documented in the Clark Mountain region.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Phacelia anelsonii Aven Nelson's phacelia	Annual herb; shady places in rich soil, base of sandstone or limestone cliffs, among rocks or in washes within Joshua tree woodland and pinyon/juniper woodland; about 3,900-4,900 ft. elev.; desert mountains (New York Mountains) in San Bernardino County to southwestern Utah.	Mar-May	FED: none BLM CA: none BLM NV: none CA: S2 NV: S1 CRPR: 2B.3	**Present:** Over 2,500 plants were observed in a small area in the Clark Mountains.	**Low:** Marginally suitable habitat is present.
Phacelia barnebyana Barneby's phacelia	Annual herb; limestone scree within pinyon/juniper woodland and Great Basin scrub; about 5,200-8,900 ft. elev.; desert mountains (Clark Mountain Range) in Inyo and San Bernardino County to western Nevada.	May-Jul	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Low:** Marginal suitable habitat is present. This species has been documented in the Clark Mountain region.	**Low:** Marginal suitable habitat present. Not considered special-status in Nevada.
Phacelia coerulea Sky-blue phacelia	Annual herb; open, sandy to rocky areas within pinyon/ juniper woodland and Mojavean desert scrub; about 4,500-6,600 ft. elev.; Mojave Desert in Inyo and San Bernardino County to Utah, Texas, and northern Mexico.	Apr-May	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Present:** Approximately 15 plants were observed in the Project Area in the Clark Mountains.	**Moderate:** Suitable habitat is present. Not considered special-status in Nevada.
Phacelia parishii Parish's phacelia	Annual herb; open, alkaline flats and slopes or on clay soils within Mojavean desert scrub and playas; about 1,700-4,000 ft. elev.; Mojave Desert in Inyo and San Bernardino County to Nevada and Arizona.	Apr-Jun	FED: none BLM CA: S BLM NV: S CA: S1 NV: S3 CRPR: 1B.1	**Present:** Over 1 million plants were observed in the Project Area and buffer north of I-15 and Manix, near Harvard Road.	**Low:** Marginally suitable habitat is present.
Phacelia perityloides* var. *jaegeri Jaeger's phacelia	Perennial herb; crevices on cliffs, rocky, often calcareous slopes within pinyon/juniper woodland; about 6,200-7,200 ft. elev.; desert mountains (Clark Mountain) in San Bernardino County to Utah, Texas, and northern Mexico.	May-June	FED: none BLM CA: S BLM NV: none CA: S2 NV: none CRPR: 1B.3	**Low:** Marginally suitable habitat is present.	**Not Likely to Occur:** No suitable habitat is present within the Project Area. The Project Area occurs outside the known geographic range. Not considered special-status in Nevada.
Physalis *(=Quincula)* lobata Lobed ground-cherry	Perennial herb; decomposed granite soil, alkaline dry lakes within Mojavean desert scrub and playas; about 1,600-2,700 ft. elev.; Mojave Desert and Sonoran Desert in	Sep-Jan	FED: none BLM CA: none BLM NV: none CA: S1S2	**Low:** Suitable habitat is present. Historic records were documented north-west of Primm.	**Not Likely to Occur:** Suitable habitat is present. Not considered special-status in Nevada.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	Riverside and San Bernardino Counties to Kansas, Texas, and northern Mexico.		NV: none CRPR: 2B.3		
Physaria chambersii Chambers' physaria	Perennial herb; limestone soils; rocky sites within pinyon/juniper woodland; about 4,900-8,200 ft. elev.; desert mountains (Clark and Grapevine Mountains) in San Bernardino Counties to Oregon, Utah, and Arizona.	Apr-Jul	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present.	**Not Likely to Occur:** No suitable habitat is present within the Project Area. Based on occurrence data, the Project Area occurs outside the known geographic range. Not considered special-status in Nevada.
Pilostyles thurberi Thurber's pilostyles	Perennial herb (parasitic); washes and desert scrub; about 0-1,200 ft. elev.; known to occur in Sonoran Desert scrub and south near Salton Sea, also Arizona, Nevada to Texas.	Dec-Apr	FED: none BLM CA: none BLM NV: none CA: S4 NV: none CRPR: 4.3	**Present:** Four plants were observed in the Project Area. Three north of Halloran Springs and one south of Daggett.	**Moderate:** Known to occur in Clark County. Not considered special-status Nevada.
Plagiobothrys parishii Parish's popcornflower	Annual herb; wet, alkaline soil around desert springs, mud flats within Great Basin scrub and Joshua tree woodland; about 2,400-7,300 ft. elev.; deserts in southern California.	Mar-Jun	FED: none BLM CA: S BLM NV: None CA: S1 NV: none CRPR: 1B.1	**Low:** Marginally suitable habitat is present.	**Not Likely to Occur:** No suitable habitat is present within the Project Area. Based on occurrence data, the Project Area occurs outside the known geographic range. Not considered special-status in Nevada.
Psorothamnus arborescens* var. *arborenscens Mojave indigo-bush	Perennial deciduous shrub; desert hillsides and stony flats Mojavean desert scrub and Riparian scrub; about 1,300 to 3,890 ft. elev.; in San Bernardino County to south to Mexico.	Apr-May	FED: none BLM CA: none BLM NV: none CA: S4 NV: none CRPR: 4.3	**Present:** Approximately 200 plants were observed within the Project Area and buffer between I-40 and Ord Mountain Road.	**Not Likely to Occur:** The Project Area occurs outside know range. Not considered special-status Nevada**.**
Sanvitalia abertii Abert's sanvitalia	Annual herb; rocky limestone slopes and washes within pinyon/juniper woodland and blackbrush scrub; about 4,700-5,800 ft. elev.; deserts mountains (Clark, Mescal, and New York Mountains); in San Bernardino County to Texas and northern Mexico.	Aug-Oct	FED: none BLM CA: none BLM NV: none CA: S2S3 NV: none CRPR: 2B.2	**High:** Suitable habitat is present. This species has been documented in the Clark Mountain region.	**Not Likely to Occur:** Suitable habitat is present. Not considered special-status in Nevada.
Sclerocactus johnsonii (=Echinomastus) Johnson's bee-hive cactus	Shrub (stem succulent); granitic slopes and plains within Mojavean desert scrub; about 1,600-4,000 ft. elev.; Mojave Desert in Inyo and San Bernardino Counties to southwestern Utah and northwestern Arizona.	Apr-May	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.2	**Moderate:** Marginally suitable habitat is present.	**Present:** One plant was observed west of McCullough Station. Not considered special-status in Nevada.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Sclerocactus polyancistrus Mojave fish hook cactus	Shrub (stem succulent); well-drained soil, on rocky gravelly mesas, slopes & outcrops; Joshua tree woodland, Mojavean desert scrub and Great Basin scrub; about 2,100-7,600 ft. elev.; desert mountains in Kern, Inyo, and San Bernardino Counties to Nevada.	Apr-Jul	FED: none BLM CA: none BLM NV: none CA: S3 NV: CY, S2S3 CRPR: 4.2	**Present:** Two plants were observed in the Project Area north of Victorville and near the Clark Mountains.	**Present:** One plant was observed in the McCullough Mountains.
Scutellaria bolanderi* ssp. *austromontana Southern mountains skullcap	Perennial herb; gravelly soils, stream banks in oak or pine woodland within chaparral, cismontane woodland, and lower montane coniferous forest.; about 2,000-6,600 ft. elev.; in Riverside, San Bernardino, and San Diego Counties.	Jun-Jul	FED: none BLM CA: S BLM NV: none CA: S3 NV: none CRPR: 1B.2	**Low:** Marginally suitable habitat is present. Nearest occurrences to the Project Area are over 100 years old.	**Not Likely to Occur:** The Project Area occurs outside the known range. Not considered special-status in Nevada.
Senna covesii Cove's cassia	Perennial herb; desert wash, dry sandy desert washes on slopes; about 1050 to 3740 ft elevation; in Arizona, California, New Mexico, and Nevada.	Mar-Jun	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.2	**Low:** Marginally suitable habitat is present.	**Present:** Approximately 15 plants were observed in the Project Area in the McCullough Mountains. Not considered special-status in Nevada.
Sphaeralcea rusbyi* var. *eremicola Rusby's desert-mallow	Perennial herb; carbonate soils; sometimes in washes within creosote bush scrub, blackbush scrub and Joshua tree woodland; about 3,300-4,900 ft. elev.; in Inyo County and Clark Mountain Range in San Bernardino County.	May	FED: none BLM CA: S BLM NV: none CA: S2 NV: none CRPR: 1B.2	**Present:** Approximately 5,800 plants were observed at several locations in the Project Area and buffer between Primm and north of Halloran Springs.	**Present:** One plant was observed in the buffer area near Primm. Not considered special-status in Nevada.
Stipa arida Mormon needle grass	Perennial grass like herb; rocky limestone ridges within pinyon/juniper woodland and Joshua tree woodland; about 3,600-6,100 ft. elev.; Mojave Desert in San Bernardino County to Colorado and New Mexico.	May-Aug	FED: none BLM CA: none BLM NV: none CA: S3 NV: none CRPR: 2B.3	**High:** Suitable habitat is present. This species has been documented near the Clark Mountains and Mojave National Preserve.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Stipa divaricata Small-flowered rice grass	Perennial grass like herb; gravel benches, rocky slopes, creek banks within pinyon/juniper woodland; about 2,600-10,200 ft. elev.; desert mountains in Inyo, Mono, San Bernardino Counties to British Columbia, Manitoba, North Dakota, and Texas.	Jun-Sep	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present. Recorded in Victorville.	**Not Likely to Occur:** The Project Area occurs outside the known range. Not considered special-status in Nevada.
Symphyotrichum defoliatum San Bernardino aster	Perennial herb; vernally mesic grassland or near ditches, streams, and springs; disturbed areas in meadows and seeps, cismontane woodland, coastal scrub, lower	Jul-Nov	FED: none BLM CA: S BLM NV: none CA: S2	**Not Likely to Occur:** No suitable habitat.	**N/A:** the Project Area occurs outside the known range. Not considered special-status in Nevada.

Special-Status Plant Species	Habitat and Distribution	Flower Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	montane coniferous forest, marshes and swamps, valley, and foothill grassland; below 6,800 ft. elev.; in southern California mountains.		NV: none CRPR: 1B.2		
Tortella alpicola Alpine crisp-moss	Moss; openings; volcanic rock within cismontane woodland; about 3,300 ft. elev.; desert mountains in San Bernardino County.	n/a	FED: none BLM CA: none BLM NV: none CA: S1 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present.	**Not Likely to Occur:** The Project Area occurs outside known range. Not considered special-status in Nevada.
Wislizenia (=Cleomella) refracta* ssp. *refracta Jackass-clover	Annual herb; sandy washes, roadsides, alkaline flats within playas, desert dunes, Mojavean desert scrub, Sonoran Desert scrub.; about 300-3,800 ft. elev.; southern Mojave Desert and northern Sonoran Desert in Riverside San Bernardino Counties to Utah, western Texas, and Mexico.	Apr-Oct	FED: none BLM CA: none BLM NV: none CA: S1 NV: none CRPR: 2B.2	**Low:** Marginally suitable habitat is present. This species has been documented between Barstow and east of Clark Mountain.	**Not Likely to Occur:** Suitable habitat is present. Not considered special-status in Nevada.
Woodsia plummerae Plummer's woodsia	Fern; limestone slopes crevices, rock bases within pinyon/juniper woodland; about 5,200–6,600 ft. elev.; Mojave Desert within Riverside and San Bernardino Counties to Texas and northern Mexico.	Mar-Sep	FED: none BLM CA: none BLM NV: none CA: S2 NV: none CRPR: 2B.3	**Low:** Marginally suitable habitat is present. This species has been documented in the Clark Mountains and Mohave National Preserve.	**Low:** Suitable habitat is present. Not considered special-status in Nevada.
Yucca brevifolia Western Joshua tree	Tree; desert flats and slopes within Joshua tree woodland, montane chaparral, pinyon and juniper woodland, Sonoran, and Mojavean desert scrub; about 2,400-7,300 ft. elev.; Mojave Desert from north slopes of the San Bernardino and San Gabriel Mountain ranges, and Antelope Valley.	Apr-May	FED: none BLM CA: S BLM NV: none CA: CAN THR NV: S3 CRPR: none	**Present:** Numerous plants were observed south of I-15 to the Victorville Switching Station. This species known range is limited to the western portion of the Project Area.	**Not Likely to Occur: T**he Project Area occurs outside the known geographic range. Not considered special-status in Nevada.

General references: Baldwin et al., 2012; BLM, 2023a; BLM, 2023b, CDFW, 2026; CNPS, 2021 and 2026; CCH, 2021; NDOW, 2026, and NDNH 2026.

Bureau of Land Management (BLM)
S: Species recognized by the BLM as sensitive.

State designations (CA): (CESA, CDFW)
CAN THR: State Candidate, threatened.
State of Nevada Protection and Designations
CE: Critically Endangered Plant
CY: Protected as a cactus, yucca, or Christmas tree

California and Nevada: Applied to special-status species; where correct category is uncertain two categories or question marks are used.
S1: Fewer than 6 occurrences or fewer than 1000 individuals or less than 2000 acres.
S2: 6-20 occurrences or 1000-3)000 individuals or 2000-10,000 acres (decimal suffixes same as above).
S3: 21-100 occurrences or 3000-10,000 individuals or 10,000-50,000 acres (decimal suffixes same as above).
S4: Apparently secure in California; this rank is clearly lower than S3, but factors exist to cause some concern, i.e., there is some threat or somewhat narrow habitat. No threat rank.

California Rare Plant Rank designations. Note: According to the California Native Plant Society (http://www.cnps.org/cnps/rareplants/ranking.php), plants ranked as CRPR 1A, 1B, and 2 meet definitions as threatened or endangered and are eligible for state listing. That interpretation of the state Endangered Species Act is not in general use.
1B: Plants rare and endangered in California and throughout their range.
2B: Plants rare, threatened or endangered in California but more common elsewhere in their range.
4: Plants of limited distribution; a watch list.

California Rare Plant Rank Threat designation extensions:
.1 Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)
.2 Fairly endangered in California (20-80% occurrences threatened)
.3 Not very endangered in California (<20% of occurrences threatened, or no current threats known)

Definitions of occurrence probability: Estimated occurrence probabilities are based on literature sources cited earlier, field surveys, and habitat analyses reported here.

Present: Observed on the site by qualified biologists.

High: Both a documented recent record (within 10 years) exists of the taxa within the Project Area or immediate vicinity (approximately 5 miles) and the environmental conditions (including soil type) associated with taxa are present within the Study Area.

Moderate: Both a documented recent record (within 10 years) exists of the taxa within the Study Area, or the immediate vicinity (approximately 5 miles) and the environmental conditions associated with taxa presence are marginal and/or limited within the Study Area, or the Study Area is located within the known current distribution of the taxa and the environmental conditions (including soil type) associated with taxa presence occur within the Study Area.

Low: A historical record (over 10 years) exists of the taxa within the Study Area or general vicinity (approximately 10 miles) and the environmental conditions (including soil type) associated with taxa presence are marginal and/or limited within the Study Area.

Not Likely to Occur: No suitable habitat on the site; or well outside the species' known elevational or geographic ranges; or the species was not detected during focused survey(s) covering 100% of all suitable habitat, completed during the appropriate season and during a year of appropriate rainfall.

4.4 Listed Threatened or Endangered Plants

One California state listed Candidate Threatened species, Western Joshua tree, and one Nevada state Critically Endangered Plant, blue diamond cholla, are present within the Project Area. No other state or federally listed plants have been reported within the vicinity of the alignment or has the potential to occur within the Project Area.

Blue diamond cholla (*Cylindropuntia multigeniculata*). Blue diamond cholla is a Nevada state Critically Endangered Plant and Protected Cactus, and a Nevada BLM Sensitive species. It is a perennial herb (stem succulent) in the cactus (Cactaceae) family that blooms in May. It occurs in a variety of soils, including those derived from rocky limestone, basalt, granite, and rhyolite substrates. Soil textures where the species occurs generally consist of sandy-loam, gravel, coarse cobbled soils, silty alluvial fan terraces, decomposed granite and schist, or clays of volcanic origin (Baker, 2005). The species occurs within Mojave Desert scrub communities dominated by creosote bush, white bursage, black brush and Joshua trees at about 3,400 to 4,600 ft. elevation amsl; in the northeastern Mojave Desert of southern Nevada and northwestern Arizona.

Several blue diamond cholla plants were observed outside proposed disturbance areas during the surveys. These observations occurred within the McCullough Range of the Nevada segment of the Study Area (Attachment A, Figure 7). Several live plants were observed in the general area where one plant was observed during the 2021 surveys. In 2026 this plant was found to have died.

Western Joshua Tree (*Yucca brevifolia*). Western Joshua tree is a California state Candidate Threatened plant. In July 2023, the Western Joshua Tree Conservation Act was enacted which prohibits the take of any western Joshua tree. The act authorizes CDFW to issue permits for the incidental take of Joshua trees. A census of Western Joshua Tree was completed in 2025 and 2026.

The western Joshua tree is in the asparagus (Asparagaceae) family and typically blooms from April through May (CNPS, 2021) and occurs in desert flats and slopes within Joshua tree woodland, montane chaparral, pinyon, and juniper woodland, Mojavean desert scrub communities of the Mojave Desert from the north slopes of the San Bernardino and San Gabriel Mountain ranges, and the Antelope Valley.

Western Joshua trees were observed during the surveys. This highest concentration of this species occurs in the ROW from an area south of Dale Evans Parkway to the Victorville Switching Station in the California segment (Attachment A, Figure 7). The known range of western Joshua tree intersects the eastern portion of the transmission line between Stoddard Wells Road to Victorville switching station (Attachment A, Figure 7). Western Joshua trees were surveyed following the guidelines of the Western Joshua Tree Census Instructions (CDFW, 2025b).

4.5 BLM and Other Sensitive Plants

California and Nevada BLM maintain a list of sensitive plant species, including species that are rare, declining, or dependent on specialized habitats. The list includes plants ranked by CNPS as CRPR 1B and 2B or sensitive by the NDNH. BLM manages sensitive species to provide protection comparable to species that may become listed as threatened or endangered (i.e., candidate species for federal listing). Several other special-status plant species ranked by the State of Nevada, or CNPS have at least a moderate potential to be present or were observed during the surveys. These include several plants ranked as CRPR 2 species and CRPR 4 species or NDNH Sensitive, Watch List and Tracking List (Attachment A, Figure 7). Sensitive plants that are designated as BLM-sensitive species or have CRPR plant ranks that were identified during surveys of the Project Area include:

Desert wing-fruit (*Acleisanthes nevadensis*). Desert wing-fruit has a CRPR of 2B.1. It is a perennial herb in the four o'clock (Nyctaginaceae) family and it blooms from June to September. It occurs on rocky slopes and shale outcrops within Joshua tree woodland and Mojavean desert scrub about 2,500–3,800 ft. elevation in the Kingston Range to southwestern Utah and northwestern Arizona.

Desert wing-fruit was not observed during the survey of the alignment. The CNDDB contains records of desert wing-fruit within five miles of the Project Area (CDFW, 2021a). Recent records are located along Excelsior Mine Road approximately 1.4 miles north of Line 1 Tower 45-5 on the California segment. Based on the presence of suitable habitat and recent nearby records; desert wing-fruit has a high potential to be present within the California segment.

Clark Mountain agave (*Agave utahensis* var. *nevadensis*). Clark mountain agave is recognized as sensitive by the Nevada BLM, a Nevada State Rank 3, and has a CRPR of 4.2. Clark Mountain agave is a perennial herb or shrub that occurs on rock limestone or volcanic slopes and cliffs in Mojavean desert scrub, Joshua tree woodland and pinyon and juniper communities. Flowering usually occurs between May and July. It is present in Inyo and San Bernardino Counties, including eastern desert mountains (Ivanpah and Clark Mountains, and Kingston range) and southern Nevada.

Clark Mountain agave was observed in California during the surveys. In addition, there are iNaturalist observations within five miles of the Project Area in California. No observations are within five miles of Project Area in Nevada. Based on observations of the plant during surveys and iNaturalist records, it should be considered present in California and have a moderate potential to be present in Nevada.

Wright's beebush (*Aloysia wrightii*). Wright's beebush has a CRPR of 4.3. It is a perennial evergreen shrub in the verbena family that occurs in California and across parts of the southwestern U.S. and Mexico. In California, it is mainly found in Riverside and San Bernardino counties, growing in Joshua tree, pinyon, and juniper woodlands at about 2955 to 5220 feet elevation, often on rocky or carbonate soils. It blooms from April to October) (CNPS, 2026).

Two plants were observed within the Clark Mountains in the California segment of the Project Area. Suitable habitat is present in the California and Nevada segments of the Project Area. Based on observations of this species during surveys and suitable habitat, Wright's beebush should be considered present in the California segment and has a high potential to occur in the Nevada segment of the Project Area.

Nevada onion (*Allium nevadense*). Nevada onion has a CRPR of 2B.3. It is a perennial herb in the onion (Alliaceae) family, and it blooms from April to May. It occurs on sandy or gravelly slopes in desert mountains within pinyon/juniper woodland and Mojavean desert scrub; about 4,200–5,600 ft. elev.; desert mountains within San Bernardino and Inyo Counties to Oregon, Idaho, Colorado, and Arizona.

Nevada onion was observed during the survey of the alignment in 2026. The CNDDB contains records of Nevada onions within five miles of the Project Area (CDFW, 2021a). There are no iNaturalist observations of this species within five miles of the Project Area. Based on the observation of this species during the surveys, suitable habitat, and known occurrences, Nevada onion is considered present within the Survey Area in California and has a low potential to occur in Nevada the segment of the Survey Area.

Small-flowered androstephium (pink funnel lily) (*Androstephium breviflorum*). Small-flowered androstephium or pink funnel lily has a CRPR of 2B.2. It is a bulbiferous perennial herb that blooms from March to April. It occurs on clayish, sandy, saline, or rocky soils within desert dunes and Mojavean Desert scrub and is also found in creosote bush scrub about 400-to-5,250-ft elevation. The species is native to

California and Nevada with known occurrences in Inyo, Riverside, and San Bernardino counties in California, and Clark County and areas of southern Nevada and to southwest Wyoming.

Small-flowered androstephium (pink funnel lily) was observed in the north area of Ivanpah Valley just west of the California-Nevada border. There are CNDDB and iNaturalist contain records within five miles of the Survey Area, including east of I-15 near Jean Nevada and near Ivanah Valley, SR 127, and north of the Soda Mountains in California. Based on the observation of this species during surveys, suitable habitat, and known occurrences, small-flowered androstephium is present within the Survey Area in California and has a high potential to occur in Nevada segment of the Survey Area.

White bear poppy (*Arctomecon merriamii*). White bear poppy is recognized as sensitive by the Nevada BLM, and it is on the NDNH At-Risk Plant and Animal Tacking List. In California it has CRPR of 2B.2. It is a perennial herb in the poppy (Papaveraceae) family, and it blooms from April to May. It occurs on rocky slopes, calcareous soil, loose shale, or sandy washes within chenopod scrub and Mojavean desert scrub communities from about 2,600 to 5,300 feet in elevation. It is present in the Clark Mountains and the Kingston Range within San Bernardino County, in Inyo County, and in southern Nevada.

White bear poppy was not observed during surveys of the alignment. Suitable habitat is present within the California and Nevada segments and records of the species in California and Nevada are within five miles of the Project Area. The CNDDB occurrences include a record two miles north of the Line 1 Tower 29-3 within the Clark Mountains of the California segment. There are iNaturalist observations of this species within five miles of the Project Area near the Nevada State line. Based on the presence of suitable habitat and recent nearby records, white bear poppy has a moderate potential to be present within the California and Nevada segments of the Project Area.

Mojave milkweed (*Asclepias nyctaginifolia*). Mojave milkweed has a CRPR of 2B.1. This species is not considered special-status in Nevada. It is a perennial herb in the dogbane (Apocynaceae) family, and it blooms from May to June. It occurs in arroyos and on dry slopes within Mojavean desert scrub and pinyon/juniper woodland communities about 3,200–5,600 ft. elevation within the Clark and New York Mountains in San Bernardino County to Nevada and New Mexico.

Mojave milkweed was observed during the surveys in the Ivanpah Valley and east of Clark Mountains. The CNDDB contains 40 records of Mojave milkweed within five miles of the Project Area (CDFW, 2021a). iNaturalist observation of this species is within five miles of the Project Area from 2019. Recent records are located along the Project alignment approximately 350 feet from the Line 2 Tower 32-3 in the California segment. Based on the observation of this species during surveys, suitable habitat, and known occurrences Mojave milkweed is present within the Survey Area in California and has a moderate potential to occur in the Nevada segment of the Survey Area.

Tidestrom's milkvetch (*Astragalus tidestromii*). Tidestrom's milkvetch has a CRPR of 2B.2. It is a perennial herb in the legume *(Fabaceae)* family, and it blooms from April to July. It occurs within washes with sandy or calcareous gravel in Mojavean desert scrub communities about 1,900–5,300 ft. elevation; occurs primarily in the Mojave Desert Near Cima within San Bernardino County to Inyo County and southern Nevada.

Tidestrom's milkvetch was observed during the survey of the alignment. Numerous individuals were observed at 10 locations within the California segment of the Project Area. All observations were restricted to the east-facing slopes of the Clark Mountains and within the Kingston Range (Attachment A, Figure 7). CNDDB and iNaturalist contain records of Tidestrom's milkvetch within five miles of the Project Area in California (CDFW, 2020a). Based on the presence of suitable habitat, recent nearby records, and

observations during the 2021 and 2026 surveys, Tidestrom's milkvetch is present in some areas and has a high potential to be present within the Project Area.

Scaly cloak fern (*Astrolepis cochisensis* ssp. *cochisensis*). Scaly cloak fern has a CRPR of 2B.3. It is a moss in the maidenhair fern (Pteridaceae) family, and it blooms from April to October. It occurs on slopes and in crevices within areas of limestone substrate of desert mountains. The scaly cloak fern generally occurs in Joshua tree woodland and pinyon/juniper woodland vegetation communities; about 3,300–5,300 ft. elevation amsl of the Mojave Desert within San Bernardino County.

Scaly cloak fern was observed during the surveys of the alignment in 2026. Due to a lack of precipitation, the species may have remained dormant during the 2021 surveys. Both CNDDB and iNaturalist contain records of scaly cloak fern within five miles of the Project Area. A recent record is located approximately two miles southeast of near Line 2 Tower 34-4 Project Area. Based on the presence of suitable habitat and recent nearby records, scaly cloak fern has a high potential to be present in the Project Area in California. This species is not considered special-status in Nevada.

Nye milkvetch (*Astragalus nyensis*). Nye milkvetch is recognized as a sensitive by the California and Nevada BLM, has a CRPR of 1B.1, and is on the NDNH At-Risk Plant and Animal Tacking List. This species is an annual herb in the legume (Fabaceae) family and blooms from April to May. It occurs in gravelly, sandy, and sometimes alkaline soils in Mojavean desert scrub communities from about 2,590 to 2,675 feet in elevation. It was discovered in California in the Pahrump Valley in 2011 (CNPS, 2026).

Nye milkvetch was not observed during surveys; however, suitable habit occurs in the Nevada segment of the Survey Area near the far eastern portion of the California segment. Based on the known range and recorded occurrences this species has a moderate potential to occur in California in the California-Nevada State line portion of the Project Area. There is a high potential for this species to occur in Nevada.

Three-awned grama (*Bouteloua trifida*). Three-awned grama has a CRPR of 2B.3. It is a perennial grass-like herb in the grass (Poaceae) family, and it blooms from May to September. It occurs on dry, rocky, generally calcareous slopes, crevices, or washes within Mojavean desert scrub communities about 600-5,300 ft. elevation within the northern and eastern portions of Mojave Desert (mostly desert mountains) to Utah, Texas, and central Mexico.

Three-awned grama was observed during surveys of the alignment. A total of numerous individuals was observed at 5 locations within the California segment of the Project Area. All observations were restricted to the east-facing slopes of the Clark Mountains and the Ivanpah Valley (Attachment A, Figure 7) Special-Status Plant and Wildlife Observations. The CNDDB includes eight records of three-awned grama within five miles of the Project Area dated from 1978 through 2013. There are iNaturalist observations of this species within five miles of the Project Area. Based on the observation of this species during surveys, suitable habitat, and known occurrences, three-awned grama is present within the Survey Area in California and has a moderate potential to occur in Nevada segment of the Project Area. This species is not considered special-status in Nevada.

Black grama (*Bouteloua eriopoda*). Black grama has a CRPR of 4.2. It is a perennial grass found across the southwestern U.S., including limited areas of California. In California, it occurs mainly in San Bernardino County, growing in Joshua tree and pinyon–juniper woodlands at 2,900 to 6,200 feet elevation, and typically blooms from May to August.

Several plants were observed within the California segment of the Project Area, specifically within the buffer area near the Clark Mountains. Historic records for this species occur in the Barstow and Victorville area. Suitable habitat occurs within the Nevada segment of the Project Area. Based on the observation of

this species during surveys, suitable habitat, and known occurrences, black grama should be considered present within the California segment and has a moderate potential to occur in the Nevada segment of Project Area. It is not considered a special-status species in Nevada.

White pygmy-poppy (*Canbya candida*). White pygmy-poppy has a CRPR of 4.2. It is a small annual herb endemic to California, occurring in Mojave Desert scrub, Joshua tree woodland, and pinyon–juniper woodland at about 2,000 to 4,400 feet elevation. It typically grows on granitic, sandy, or gravelly soils and blooms from March to June (CNPS, 2026).

Suitable habitat is present and historic records for this species occur in the Barstow and Victorville area. Based on the suitable habitat and known occurrences, white pygmy poopy has a moderate potential to occur in the California segment of the Project Area. The Nevada segment of the Project Area occurs outside the known geographic range and therefore it is not likely to occur.

Emory's crucifixion thorn (*Castela emoryi*). Emory's crucifixion thorn has a CRPR of 2B.1. It is a shrub in the quassia (Simaroubaceae) family, and it blooms from June to July. It occurs in areas of fine sand or silt, within slopes, washes, plains, and non-saline bottomland within Mojavean desert scrub, and playas; about 350–2,100 ft. elevation in the Mojave and Sonoran Deserts to Arizona and Baja California.

Emory's crucifixion thorn was not observed during surveys of the alignment. CNDDB and iNaturalist record this plant within five miles of the Project Area including a recent record located approximately 3.6 miles southeast of Line 2 Tower 83-3. Based on the presence of suitable habitat and recent nearby records, Emory's crucifixion thorn has a high potential to be present in the California segment.

Mojave spineflower (*Chorizanthe spinosa*). Mojave spineflower has a CRPR of 4.2. It is a California-endemic annual herb that grows across desert habitats including Mojavean desert scrub, Joshua tree woodland, chenopod scrub, and playas a sea level to about 4,300 elevation feet. It typically blooms March through July and may occur on alkaline soil. It is found in several counties, including Kern, Los Angeles, San Bernardino, and San Luis Obispo (CNPS, 2026).

This species was observed outside of the Survey Area within a reference site near Kramer Junction. The Nevada segment occurs outside the known geographic range for this species and therefore is not likely to occur.

Bush loving cryptantha or Flexous forget me not (*Cryptantha dumetorum*). This species has several common names and is on the NDHD At-Risk Plant and Animals Tracking list and is a S2 Nevada species. It is an annual herb in the Boraginaceae family, and it blooms from March to May. This species occurs on sandy or gravelly soils, generally under other plants within the Creosote Bush Scrub community about 1510 to 4890 ft. elevation throughout San Bernardino County and elsewhere in California and Nevada.

The bush loving cryptantha was not observed during surveys. However, suitable habitat is present within the California and Nevada segments of the Project Area. Based on suitable habitat and records in Nevada, there is a moderate potential for this species to occur in California and Nevada.

Gilman's cymopterus (*Cymopterus gilmanii*). Gilman's cymopterus has a CRPR of 2B.3, is considered S2S3, and is on the NDHH At-Risk Plant and Animal Tracking List. It is a perennial herb in the parsley (Apiaceae) family, and it blooms from April to May. The species occurs on limestone and gypsum slopes within Mojavean desert scrub communities about 2,900-6,600 ft. elevation primarily in the Clark Mountains of San Bernardino County and desert mountains of Inyo County and Nevada.

Gilman's cymopterus was not observed during surveys of the alignment. There are CNDDB occurrences of Gilman's cymopterus within five miles of the Project Area. Records are located approximately 1.5 miles

north of Line 1 Tower 29-4 in the California segment. Based on the presence of suitable habitat and recent nearby records; Gilman's cymopterus has a high potential to be present in the California and Nevada segments of the Project Area.

Purple-nerve cymopterus (*Cymopterus multinervatus*). Purple-nerve cymopterus has a CRPR of 2B.2. It is a perennial herb in the parsley family, and it blooms during the spring from March to April. It occurs on sandy and rocky slopes within Mojavean desert scrub and pinyon/juniper woodland communities about 2,000-5,900 ft. elevation within desert mountains of Inyo, Riverside and San Bernardino Counties. Within the vicinity of the Project Area occurrences primarily occur within the Clark and Rodman Mountains.

Purple-nerve cymopterus was observed during the 2026 surveys of the alignment. The CNDDB includes several records of purple-nerve cymopterus within five miles of the Project Area. Purple-nerve cymopterus is known to be present within the Project Area in California.

Mojave monkeyflower (*Diplacus mohavensis*). Mojave monkeyflower is recognized as a sensitive species by the California BLM, is a covered species under DRECP, and has a CRPR of 1B.2. It is an annual herb in the lopseed (Phrymaceae) family, and blooms in the spring from April to June. It occurs in dry, sandy, or rocky washes along the Mojave River within Joshua tree woodland and Mojavean desert scrub communities from about 1,900 to 3,300 feet in elevation in the Mojave Desert of western San Bernardino County (CCH, 2021). It is found in several locations near Barstow and Lucerne Valley.

Mojave monkeyflower was observed during 2026 surveys of the alignment at reference locations. It was not detected during surveys of the Project Area. Suitable habitat is present within the California segment and many occurrences that may intersect with the Project Area are known between the community of Daggett and the Victorville Switching Station. The CNDDB includes 40 records of Mojave monkeyflower within five miles of the Project Area. There are iNaturalist records of Mojave monkeyflower within five miles of the Project Area. A recent CNDDB record is located approximately 2.6 miles to the east of Line 2 Tower 129-1 south of Interstate 40. Mojave monkeyflower has a high potential to be present in the California segment of the Project Area. This species is not likely to occur in Nevada based on the known range of the species, and it is not a special-status species in Nevada.

Nine-awned pappus grass (*Enneapogon desvauxii*). Nine-awned pappus grass has a CRPR of 2B.2. It is a perennial grass-like herb in the grass family, and it blooms during the late summer from August to September. This species is found on rocky slopes and crevices in decomposed granite, or in gravelly limestone soils within pinyon/juniper woodland about 4,100-6,000 ft. elevation primarily in the Clark and New York Mountains of the eastern Mojave Desert in San Bernardino County.

Nine-awned pappus grass was not observed during surveys of the alignment. The CNDDB occurrences of nine-awned pappus grass are within five miles of the Project Area including within the Line 1 Tower 43-3 east of Excelsior Mine Road within the California segment. Based on the presence of suitable habitat and recent nearby records; nine-awned pappus grass has a high potential to be present in the California and Nevada segments of the Project Area.

Booth's evening-primrose (*Eremothera boothii* ssp. *boothii*). Booth's evening primrose has a CRPR of 2B.3. This species occurs primarily in the Great Basin, with a few California and Arizona occurrences at the western and southern margins of its geographic range. Locally, it occurs in the Mojave River wash. There are a few other California occurrences in Inyo and Mono Counties though it seems likely that it may also occur in the mountain and desert margins of Kern and Los Angeles Counties (White and Sanders, 1997). Its elevation range is about 2900 to 7900 feet. It is an annual herb that flowers between April and September, following either spring or summer rains. All local records have been in the Mojave River wash itself, and not on the surrounding desert plains and bajadas.

Booth's evening-primrose was not observed during surveys; however, suitable habitat observed in discrete locations. Based on records, and observed suitable habitat, this species has a moderate potential to occur in the Project Area in California. This species has a low potential to occur in Nevada, and it is not a special-status species in Nevada.

Harwood's eriastrum (*Eriastrum harwoodii*). Harwood's eriastrum is recognized as sensitive by the California BLM and has a CRPR of 1B.2. It is an annual herb in the phlox (Polemoniaceae) family and blooms from May to June. It occurs in areas with sandy soils and desert dunes in creosote-bush scrub from about 410 to 3,000 feet in elevation in the Mojave and Sonoran Deserts throughout southern California.

Harwood's eriastrum was observed at two locations during the surveys, on the north side of the Mojave River east of Barstow at Line 1 Tower122-5 and Line 2 Tower 121-4 (Attachment A, Figure 7). However, the CNDDB and iNaturalist do not contain any records of Harwood's eriastrum within five miles of the Project Area. Based on presence of suitable habitat and observations during surveys, Harwood's eriastrum should be considered present in the California segment of the Project Area. The Nevada segment occurs outside the known geographic range for this species and therefore is not likely to occur.

Clark Mountain buckwheat (*Eriogonum heermannii var. floccosum*). Clark Mountain buckwheat has a CRPR of 4.2. It is a perennial deciduous shrub found in California and Nevada, typically growing in pinyon–juniper woodland habitats at elevations of about 2,955 to 7,875 feet elevation. It blooms from August to October and is usually associated with carbonate soils. In California, it is limited mainly to San Bernardino County (CNPS, 2026).

Approximately 94 plants were observed in the Clark Mountains within the California segment of the ROW. The Nevada portion of the Project Area supports marginally suitable habitat, and records were documented within 1 mile of the Project Area. Based on observations of this species during the surveys, and the presence of suitable habitat, Clark Mountain buckwheat should be considered present within the California segment and have a low potential to occur in the Nevada segment of the Project Area.

Barstow woolly sunflower (*Eriophyllum mohavense*). Barstow woolly sunflower is considered sensitive by the California BLM, has a CRPR of 1B.2, and is a covered species under DRECP. This species is endemic to the western Mojave Desert in San Bernardino and Kern counties, occurring on sandy or loamy soils on alkaline flats and playa margins (CNPS, 2024; Baldwin et al., 2012). Most known populations are concentrated in the vicinities of Barstow, Kramer Junction, and Lucerne Valley (Calflora, 2026). Like many desert annuals, its abundance is highly dependent on precipitation. Thousands of individuals may be present in years of high winter rainfall, whereas the species may not germinate at all during drought years.

Barstow woolly sunflower is a diminutive, white-woolly annual, often reaching only 1 to 3 centimeters in height (Baldwin et al., 2012). In California, it typically flowers between March and May (CNPS ,2026). Based on similar morphology, it is closely related to Pringle's woolly sunflower (*E. pringlei*) and can be found in similar habitats (Jepson, 2026). Barstow woolly sunflower is distinguished by its extremely small stature and its flower heads, which consist of only 3 to 5 (usually 4) yellow disk flowers, while *E. pringlei* typically possesses 6 to 10 disk flowers and slightly different pappus scales (Jepson, 2026).

Barstow woolly sunflower was not observed during surveys; however, suitable habitat was observed in the Project Area. Based on known populations occurrences and observed suitable habitat, it has a moderate probability to occur, especially outside the vicinity of Bartow in the California segment. The Nevada segment occurs outside the known geographic range for this species and therefore is not likely to occur. This species is not considered special-status in Nevada.

Desert pincushion (*Escobaria* (=*Coryphantha*) *chlorantha).* Desert pincushion has a CRPR of 2B.1. It is a protected cactus in Nevada. It is a perennial herb (stem succulent) in the cactus family, and it blooms from April to September. It occurs on calcareous substrates within rocky and gravelly sites in Mojavean desert scrub, Joshua tree woodland, and pinyon/juniper woodland communities about 3,200-7,900 ft. elevation primarily in the Clark Mountains and the Kingston Range in eastern San Bernardino County.

Desert pincushion was observed during surveys of the alignment. Approximately 5,800 plants were observed in the California segment. This species was restricted to the Clark Mountains, Kingston Range, and the Ivanpah Valley (Attachment A, Figure 7). Additional observations of the species occurred within the Nevada segment. Hhowever the species is not considered sensitive by the Nevada BLM or the state of Nevada. Based on the presence of suitable habitat, recent nearby records, and observations during the surveys, desert pincushion is in the Project Area.

Viviparous foxtail cactus (*Escobaria* (=*Coryphantha*) *vivipara* var. *rosea*). Viviparous foxtail cactus has a CRPR of 2B.2. It is a perennial herb (stem succulent) in the cactus family, and it blooms from May to June. This species occurs on gravelly limestone or volcanic slopes and brushy hillsides within Mojavean desert scrub and pinyon/juniper woodland communities about 4,900-8,900 ft. elevation within the Clark and New York Mountains in eastern San Bernardino County and southern Nevada.

Viviparous foxtail cactus was observed at L1 1300 during surveys of the California segment of the Project Area. There are CNDDB and iNaturalist occurrences within five miles of the Project Area. Based on the presence of suitable habitat, existing records, and observations during the surveys, viviparous foxtail cactus should be considered present in California and Nevada.

Desert bedstraw (*Galium proliferum*). Desert bedstraw has a CRPR of 2B.2. It is an annual herb in the madder (Rubiaceae) family, and it blooms from April to May. It occurs on rocky banks and limestone ledges within Joshua tree woodland, Mojavean desert scrub, and pinyon/juniper woodland communities about 3,600-4,600 ft. elevation primarily within the Clark and New York Mountain in San Bernardino County.

Desert bedstraw was observed during surveys of the California segment of Project Area. Approximately 500 plants were observed in Survey Area in the Clark Mountains. In addition, there are CNDDB occurrences of this species within five miles of the Project Area approximately 1.8 miles north of Line 1 Tower 34-3 in the Clark Mountains in the California segment Although there is suitable habitat in the Nevada segment the species was not observed during surveys. Based on the observations during surveys, the presence of suitable habitat, and recent nearby records, desert bedstraw should be considered present in the California segment and has a moderate potential to be present in the Nevada segment of the Project Area.

Parish's club-cholla (*Grusonia parishii*). Parish's club-cholla has a CRPR of 2B.2. It is a perennial herb (stem succulent) in the cactus family, and it blooms from May to June. The species occurs in sandy soils or gravelly flats generally in Mojavean desert scrub and Joshua tree woodland communities about 900-4,000 ft. elevation primarily within desert mountains in Riverside and San Bernardino County. Near the Project Area the species primarily occurs within the Clark and New York Mountains.

Parish's club-cholla was observed during the surveys. Numerous individuals were identified within the California segment of the Project Area. All observations were restricted to the Ivanpah Valley and west of the Clark Mountains (Attachment A, Figure 7). Additional observations of the species occurred within the Nevada segment, but the species is not considered special-status in Nevada. The CNDDB and iNaturalist contains records of Parish's club-cholla within five miles of the Project Area in California. Based on the presence of suitable habitat, recent nearby records, and observations during surveys, Parish's club-cholla should be considered present in both the California and Nevada segments of the Project Area.

Ribbed cryptantha (*Johnstonella costata*). Ribbed crytantha has a CRPR of 4.3. It is an annual desert herb found in California, Arizona, and Baja California, typically occurring in desert dunes, Mojavean desert scrub, and Sonoran Desert scrub at low elevations from about 200 to 1,600 feet elevation and is found on sandy soils. It blooms from February to May and is distributed across several southern California counties, including Imperial, Riverside, San Bernardino, and San Diego (CNPS, 2026).

Ribbed cryptantha was observed during the surveys. Approximately 100 plants were observed in the buffer areas north of Baker and roughly 1,000 plants were documented in the general area outside just outside of the buffer in the California segment of the ROW (Attachment A, Figure 7). Based on observations during surveys, and suitable habitat, ribbed cryptantha should be considered present in the California segment and has a low potential to occur in Nevada. It is not considered a special-status species in Nevada.

Dune linanthus/sand linanthus (*Linanthus arenicola*). Sand linanthus does not have a CRPR but has a state ranking of S3 in Nevada. It is a California native annual herb that grows in sandy desert habitats, particularly dunes and sandy flats within communities such as creosote bush scrub and Joshua tree woodland occurring from 1,705 to 4,625 feet elevation. It is not considered threatened or formally listed and is treated as part of the general desert flora with documented but relatively limited observations. It blooms from March to April and its range is centered in California's Mojave Desert and southern Sierra Nevada regions, extending into Nevada, where it occupies suitable sandy habitats at moderate desert elevations (Jepson, 2026).

The Project Area in California occurs outside the known range of this species. This species has a high potential to occur in the Nevada segment of the ROW due to the presence of suitable habitat and occurrences being documented within one mile of the Project area.

Mojave menodora (*Menodora spinescens var. mohavensis*). Mojave menodora is regognized as sensitive by the California BLM, has a CRPR listing of 1B.2. It is a perennial deciduous shrub endemic to California, occurring in Mojave Desert scrub habitats on rocky hillsides, canyons, and andesite gravel soils at elevations of about 690–2000 meters. It blooms in spring (April–May) (CNPS, 2026).

Mojave menodora was observed during surveys in the California segment of the Project Area. Approximately 15 plants were observed between I-40 and SR-247. Based on the observations of this species during the surveys and the presence of suitable habitat, it should be considered present in the California segment. The Nevada portion of the Project Area occurs outside of the known range of this species and therefore is not likely to occur. It is not considered a special-status species in Nevada,

Polished blazing star (*Mentzelia polita*). Polished blazing star is recognized as sensitive by the California and Nevada BLM, is on the NDNH At-Risk Plant and Animal Tacking List species and has a CRPR of 1B.2. It is an annual herb in the loasa (Loasaceae) family and blooms from May to June. It occurs in washes and in areas with limestone or white gypsum-rich soils within Mojavean desert scrub communities from about 3,900 to 5,000 feet in elevation in the Clark Mountain Range in Inyo and San Bernardino Counties and into southern Nevada.

Polished blazing star was observed during surveys in the California segment of the Survey Area. A total of approximately 130 plants were observed. Most of the plants were detected near the Clark Mountain and a few plants were observed west of Kingston Road (Attachment A, Figure 7). The CNDDB contains records of polished blazing star within five miles of the Project Area (CDFW, 2021a). Within the Nevada segment, suitable habitat is present and it has been documented in vicinity of the Project Area; however, it was not observed during surveys. Based on the observations during the surveys, presence of suitable habitat, and

recent nearby records the polished blazing star should be considered present in the California segment and has a high potential to occur in the Nevada segment of the Project Area.

Argus blazing star/Darlington's blazing star (*Mentzelia puberula*). Darlington's blazing star has a CRPR of 2B.2. It is a perennial herb in the Loasaceae family that occurs in California, Nevada, and Arizona, primarily within Mojave and Sonoran Desert scrub habitats at low to mid elevations at about 295 to 420 feet elevation. It typically grows on rocky, sandy soil and blooms in spring from March to May. In California, it is found in Imperial, Riverside, and San Bernardino counties. There are relatively few documented occurrences (about 11), most of which are older records, and it may face threats such as renewable energy development, highlighting the importance of site-specific surveys to confirm its presence (CNPS, 2026).

Argus blazing stars were not observed during the surveys. However, suitable habitat is present within the California and Nevada segments of the Project Area. Based on the presence of suitable habitat, it has a moderate potential to occur in the California and Nevada segments of the Project Area.

Creamy blazing star (*Mentzelia tridentata*). Creamy blazing star has a CRPR of 1B.3. It is an annual herb in the loasa (Loasaceae) family, and blooms from April to May. It generally occurs within Mojavean desert scrub communities dominated by creosote bush at about 2,200 to 4,300 feet in elevation in southern California deserts to Colorado and northwestern Arizona.

Creamy blazing stars were observed during the survey of the alignment in California. Approximately 40 plants were observed south of Barstow during 2024 surveys (Attachment A, Figure 7). The CNDDB contains records of creamy blazing stars within five miles of the Project Area (CDFW, 2021a). There are iNaturalist observations of this species within five miles of the Project Area. A recent record is located within the Project Area at Line 2 Tower 132-2. Based on the observations during surveys, presence of suitable habitat, and recent records, creamy blazing stars should be considered present in the California segment and is not likely to occur in the Nevada segment of the Project Area.

Utah mortonia (*Mortonia utahensis*). Utah has a CRPR of 4.3. It is a perennial evergreen shrub found in desert habitats including Joshua tree woodland, Mojavean Desert scrub, and pinyon–juniper woodland, typically on carbonate soils and occurs at 2,495 to 6,890 feet elevation. It occurs in California (primarily Inyo and San Bernardino counties) and across the southwestern U.S. (CNPS, 2026).

Utah mortonia was observed during the surveys. Over 1,000 plants were observed in the Survey Area in the Ivanpah Valley and the eastern edge of the Clark Mountains in the California segment of the Project Area. Suitable habitat occurs within the Nevada portion of the Project Area, and there are records documented north of Primm and south of Jean. This species is not considered a special-status species in Nevada. Based on observations of this species during the surveys, the presence of suitable habitat, and known occurrences, Utah mortonia should be considered present in the California segment and has a high potential to occur in the Nevada segment of the Project Area.

Crowned muilla/pygmy muilla (*Muilla coronata*). Crowned muilla has a CRPR of 4.2 and is on the Nevada At-Risk Plant and Animal Track List (NDNH, 2026). It is a small perennial bulbiferous herb with narrow basal leaves and a short flowering stem that reaches approximately six inches in height. It primarily blooms between March and April (and occasionally into May). After flowering, it dies back to the ground after going to seed. Its flower structure is distinctive, in that the filaments are conspicuously wide, forming a crown-like ring within the petals. It occurs in creosote bush scrub, Mojavean desert scrub, pinyon-juniper woodland, Joshua tree woodland desert shrublands and woodlands, between about 2,200 and 6,430 feet in elevation. Native to the Mojave Desert in eastern California and southern Nevada, with occurrences from Tulare and Inyo Counties south through Kern, Los Angeles, and San Bernardino Counties, and extending into southwestern Nevada.

Crowned muilla was observed during surveys in the California segment of the Project Area. Approximately 10 plants were observed in the Project Area west of Shadow Mountain. Based on observations of this species during the surveys and the presence of suitable habitat, crowned muilla should be considered present in the California segment and has a high potential to occur in the Nevada segment of the Project Area.

Cave evening-primrose (*Oenothera cavernae*). Cave evening-primrose is considered BLM Nevada sensitive and has a CRPR of 2B.1. It is a perennial herb in the evening primrose (Onagraceae) family, and it blooms from April to May. This species generally occurs on gravelly, often calcareous substrate within Great Basin scrub, Joshua tree woodland, and Mojavean desert scrub communities about 6,200-7,600 ft. elevation. Near the vicinity of the Survey Area the species occurs in the Clark Mountains in San Bernardino County and southern Nevada.

Cave evening-primrose was observed during surveys of the alignment near the Ivanpah Valley and in the Clark Mountains. CNDDB includes records of cave evening-primrose occur within five miles of the Project Area. iNaturalist observations include a recent record located approximately 2.5 miles north of Line 1 Tower 32-1 north of Ivanpah. Based on the observations of this species during the surveys, the presence of suitable habitat, and recent nearby records, Cave evening-primrose should be considered present in the California segment and have a low potential to occur in the Nevada segment of the Project Area.

Caespitose evening-primrose (*Oenothera cespitosa ssp. crinita*). Caespitose has a CRPR of 4.2. It is a perennial herb found in a range of habitats including pinyon–juniper woodland, Sonoran Desert scrub, and subalpine coniferous forest at 3,700 to 10,900 feet elevation. It blooms mainly from June to September (sometimes beginning in April). The subspecies is distributed in California (notably Inyo, Lassen, and San Bernardino counties) as well as other western states (CNPS, 2026).

Caespitose evening-primrose was observed in the California segment of the Survey Area. Approximately 360 plants were observed in the Clark Mountains. Based on observations of this species during surveys and the presence of suitable habitat, caespitose evening-primrose, should be considered present in the California segment of the Project Area. This plant was determined not likely to occur within the Nevada segment of the Project due to the lack of suitable habitat.

Short-joint beavertail (*Opuntia basilaris* var. *brachyclada*). Short-joint beavertail is considered sensitive by California BLM and has a CRPR of 1B.2. It is a low-growing cactus with grayish green stems and no spines or tubercles. It is a variety of the common beavertail cactus (*O. basilaris*), distinguished by the stem joints which are relatively short and conspicuously cylindrical rather than flattened. Short-jointed beavertail and common beavertail commonly hybridize in several areas, and the two varieties are weakly differentiated (Parfitt & Baker, 1993). Short-jointed beavertail generally flowers between April and August but can be identified year-around by its stem shape. It occurs along the desert-facing slopes and extends into cismontane areas near passes in Los Angeles and San Bernardino Counties. Short-joint beavertail also occurs in the Liebre Mountains, San Gabriel Mountains, and western San Bernardino Mountains roughly from the Newhall area to the Mojave Forks area, generally in desert shrublands, pinyon or juniper woodlands, Joshua tree woodlands, or desert transition chaparral. Its elevation ranges between 1,400 to 6,500 feet in elevation.

Although the short-joint beavertail is not known to occur in the Survey Area, one plant was found that has some characteristics of the short-joint beavertail; however, the plant lacks characteristics to consider the plant a short-joint beavertail. This plant was observed during surveys in California at the western edge of the Survey Area, just north of the Mojave River. iNaturalist records are not found within the Survey Area. Based on the presence of suitable habitat, short-joint beavertail has a moderate potential to occur in a

western edge of the California segment of the Survey Area. It is not likely to occur in the eastern section of the Project Area in California or Nevada.

Curved-spine beavertail (*Opuntia xcurvispina*). Curved-spine beavertail has a CRPR 2B.2. This species is found in California and the broader Southwest, occurring in chaparral, Mojave Desert scrub, and pinyon–juniper woodlands at about 3,250 to 4,595 feet elevation. In California, it is known only from San Bernardino County, with very few documented occurrences (CNPS, 2026).

Curved-spine beavertail was observed during the surveys. Approximately 12 plants were observed within the California segment of the Project Area located in the Clark Mountains and north of Hollow Hills Wilderness area. Based on observations of the species during the surveys and the presence of suitable habitat, curved-spine beavertail should be considered present in the California segment and has a high potential to occur in the Nevada segment of the Project Area.

New York Mountains oreocarya (*Oreocarya tumulosa*). New York Mountains oreocarya has a CRPR of 4.3. It is a perennial herb found in Mojavean desert scrub and pinyon–juniper woodland habitats at 4,600 to 6,900 feet elevation, often on a variety of soil types including carbonate, clay, granitic, and gravelly substrates. It blooms from April to June and occurs in California (Inyo, Kern, and San Bernardino counties) as well as Nevada (CNPS, 2026).

New York Mountains oreocarya was observed during the surveys. Approximately 970 plants were observed in the Survey Area near the Clark Mountains in the California segment of the ROW. Although it was not observed during surveys in Nevada, it is known to occur in the McCullough Mountain Range. Based on the observations of this species during the surveys and the presence of suitable habitat, New York Mountains oreocarya should be considered present in the California segment and has a moderate potential to occur within the Nevada segment of the Project Area.

Beaver dam breadroot (*Pediomelum castoreum*). Beaver dam breadroot is a California and Nevada BLM Sensitive species and has a CRPR of 1B.2. This perennial herb is found in sandy soils such as washes in Joshua tree woodland and Mojavean desert scrub habitats. It typically blooms from April to May. This species is found in the Mojave Desert in San Bernardino County and Nevada.

Beaver dam breadroot was not observed during surveys. However, suitable habitat is present in the California and Nevada sections of the Project Area. Several CNDDB records of this species are within five miles of the Project Area and include occurrences near SR-247. Records of occurrence tend to be in the general vicinity of Barstow, Victorville and east of Mesquite Wilderness north of the Survey Area. Based on the presence of suitable habitat and known occurrences, there is a moderate potential for Beaver dam breadroot to occur in the California segment of the Project Area and a low potential for it to occur in the Nevada segment of the Project Area.

White margined beardtongue (*Penstemon albomarginatus*). White margined beardtongue is recognized as sensitive by the California and Nevada BLM, is Nevada State Tracked and has a CRPR of 1B.1. It is a perennial herb in the plantain (Plantaginaceae) family and blooms in the spring from March to May. It occurs in washes and along roadsides within Mojavean desert scrub and desert dunes with deep stabilized desert sand from about 1,800 to 3,500 feet in elevation in San Bernardino County, California to Nevada and Arizona.

White margined beardtongue was observed during surveys of the alignment. Approximately 35 plants were observed at various locations along Prison Road near Jean and one plant was observed along the transmission corridor in Nevada. There are records of this species within the Project Area, near Line 1 and an access road in the Nevada segment. In addition, this species has been recorded between I-40 and I-15

east of Minneola in California. Based on the observation of this species during the surveys, the presence of suitable habitat, and recent nearby records, white margined beardtongue should be considered present and has a high potential to occur along other portions of the Nevada segment and a high potential to occur in the California segment.

Yellow two-tone beardtongue (*Penstemon bicolor* ssp. *bicolor*). Yellow two-tone beardtongue is considered Nevada BLM sensitive and does not have a CRPR. It is a perennial herb that occurs on gravelly and rocky soils within desert communities such as creosote bush scrub, blackbush scrub, and Joshua tree woodland, typically at 2,500 to 5,500 feet elevation. It flowers in May and is adapted to arid desert environments, where it persists in well-drained, coarse substrates and is associated with sparse shrub vegetation (Jepson, 2026).

Yellow two-tone beardtongue was observed during the surveys. One plant was observed in the California segment of the Project Area in the Clark Mountains (Attachment A, Figure 7). It should be considered present in the California segment of the Project Area. This species has a high potential to occur within the Nevada segment of the Project Area due to the presence of suitable habitat and historic records documented within one mile of the ROW.

Rosy two-toned beardtongue (*Penstemon bicolor* ssp. *roseus*). Rosy two-toned beardtongue is recognized as sensitive by the California and Nevada BLM and has a CRPR of 1B.1. It is a perennial herb in the plantain (Plantaginaceae) family and blooms in May. It occurs on rocky or gravelly sites within Joshua tree woodland and Mojavean desert scrub communities from about 2,800 to 4,900 feet in elevation in the Clark Mountains in San Bernardino County and southern Nevada.

Rosy two-toned beardtongue was observed within the California Segment of the alignment in (Attachment A, Figure 7). Rosy two-toned beardtongue was observed in the Clark Mountains and the Ivanpah Valley portions of the Project Area. The CNDDB contains records of rosy two-toned beardtongue within five miles of the Project Area. Based on the occurrences of this species during the surveys, rosy two-toned beardtongue should be considered present and has a high potential to occur along other portions of the California segment of the Project Area.

Rosy two-tongue was observed within the Nevada portion of the Project in the McCullough Range and the Ivanpah Valley Area (Attachment A, Figure 7). There are iNaturalist observations within five miles of the Project Area. This species has also been documented in the Clark County MSHCP Boulder City Conservation Easement (Clark County, 2023). Based on the occurrences of this species during the surveys, rosy two-toned beardtongue should be considered present and has a high potential to occur along other portions of the Nevada segment of the Project Area.

Avens Nelson's phacelia (*Phacelia anelsonii*). Aven Nelson's has a CRPR of 2B.3, a California state rank of 2. It is an annual herb found in California and neighboring states, typically growing in Joshua tree and pinyon–juniper woodlands at about 3,900 to 4,900 feet elevation. It blooms in the spring (April–May) and is usually associated with carbonate, gravelly, or sandy soils. In California, it occurs mainly in Inyo and San Bernardino counties (CNPS, 2026).

Avens Nelson's phacelia was observed during the surveys. Over 2,500 plants were observed in a small area in the Clark Mountains. This species was not detected during surveys in Nevada. However, marginal habitat is present in Nevada. Based on observations of this species during the surveys, the presence of suitable habitat, and documented cooccurrences, Avens Nelson's phacelia should be considered present in the California segment and has a low potential to occur in the Nevada segment of the Project Area.

Sky-blue phacelia (*Phacelia coerulea*). Sky-blue phacelia has a CRPR of 2B.3. It is an annual herb in the borage (Boraginaceae) family, and it blooms from April to May. The species occurs in open areas with sandy to rocky substrates within pinyon/juniper woodland and Mojavean desert scrub communities about 4,500-6,600 ft. elevation within the Mojave Desert. It is known to occur in Utah, Texas, and northern Mexico. Near the Project Area the species occurs within the Clark and New York Mountains of eastern San Bernardino County and southern Nevada.

Sky-blue phacelias were observed during surveys of the alignment in California (Attachment A, Figure 7). The CNDDB records include an observation approximately 2.4 miles north of Line 1 Tower 32-5 within the Clark Mountains in the California segment. Based on observation of this species during the surveys, the presence of suitable habitat, and recent nearby records sky-blue phacelia should be considered present and has a high potential to occur along other portions of the California segment.

Sky-blue phacelia was not observed during surveys of the Project Area in Nevada. Based on the presence of suitable habitat, it has a moderate potential to occur along the Nevada segment of the Project Area.

Parish's phacelia (*Phacelia parishii*). Parish's phacelia is recognized as sensitive by the California and Nevada BLM and has a CRPR of 1B.1. It is an annual herb in the borage (Boraginaceae) family and blooms in the spring from April to June. It occurs in open areas, alkaline flats, and slopes with clay soils within Mojavean desert scrub, playa communities from about 1,700 to 4,000 feet in elevation within the Mojave Desert in Inyo and San Bernardino Counties to Nevada and Arizona.

Parish's phacelia was observed during surveys of the Project Area. Approximately one million plants were mapped near L1 3023 during the 2026 surveys (Attachment A, Figure 7). CNDDB and iNaturalist contain records of Parish's phacelia within five miles of the Project Area. Based on observations of this species during the surveys, the presence of suitable habitat, recent observations and known records, Parish's phacelia should be considered present and has a high potential to occur along other portions of the California segment.

Parish's phacelia was not observed during the survey of the Project Area in Nevada. There are no iNaturalist records within the Project Region. Based on the presence of suitable habitat and a lack of records, Parish's phacelia has a low potential to occur along the Nevada segment of the Project Area.

Thurber's pilostyles (*Pilostyles thurberi*). Thurber's pilostyles has a CRPR of 4.3. It is a unique parasitic perennial herb that occurs in Sonoran Desert scrub habitats at low desert elevations occur from 0 to 1,200 feet elevation. It lives almost entirely inside its host plant, typically Psorothamnus species (e.g., *P. emoryi*), emerging only as small flowers on the host stems, reflecting its specialized ecological strategy. The species blooms from December to April and has a range extending across the southwestern U.S. and Mexico, with occurrences in Imperial and San Diego counties in California (CNPS, 2026).

Thurber's pilostyles were observed during the surveys. Approximately four plants were observed in the California segment of the Project Area. Three north of Halloran Springs and one south of Daggett (Attachment A, Figure 7). Based on the observations of the species during the surveys and the presence of suitable habitat, Thurber's pilostyles should be considered present in the California segment of Project Area. This species has a moderate potential to occur within the Nevada segment of the Project Area. It is known to occur in Clark County, however it is not considered special-status in Nevada.

Abert's sanvitalia (*Sanvitalia abertii*). Abert's sanvitalia has a CRPR of 2B.2. It is an annual herb in the aster (Asteracear) family, and it blooms from August through October. The species occurs in rocky limestone slopes and washes within pinyon/juniper woodland and blackbrush scrub; about 4,700-5,800

ft. elevation within the desert mountains (Clark, Mescal, and New York Mountains) in San Bernardino County to Texas and northern Mexico.

Abert's sanvitalia was not observed during the survey of the alignment. The CNDDB contains records of Abert's sanvitalia within five miles of the Project Area (CDFW, 2021a). There are no iNaturalist observations of this species within five miles of the Project Area. A recent record is located one mile south of Line 2 Tower 34-3 within the Clark Mountains in the California segment. Based on the presence of suitable habitat and recent nearby records Abert's sanvitalia has a high potential to be present in the California segment. It was not observed during surveys, and it is not considered special-status species in Nevada.

Johnson's bee-hive *(Sclerocactus Johnsonii* (*=Echinomastus*)). Johnson's bee-hive has a CRPR of 2B.2. It is a perennial cactus found in the Mojave Desert of California and nearby states, typically growing on granitic desert scrub soils at elevations of about 1,600 to 4,000 feet elevation. It blooms in spring from April to May and, in California, it occurs mainly in Inyo and San Bernardino counties (CNPS, 2025).

Johnson's bee-hive was observed during surveys in the Nevada segment of the Survey Area. One plant was observed west of the McCullough Mountain Range. However, it is not considered special-status in Nevada. This species was not observed in the California segment of the Project areas. Based on suitable habitat, it has a moderate potential to occur int eh California segment of the Project Area.

Mojave fishhook cactus (*Sclerocactus polyancistrus*). Mojave fishhook cactus is a state of Nevada Protected Cactus and has a CRPR 4.2. It is a shrub (stem succulent) in the cactus (Cactaceae) family, and it blooms from April to July. It occurs on well-drained soil, on rocky gravelly mesas, slopes, and outcrops in Joshua tree woodland, Mojavean desert scrub and Great Basin scrub about 2,100-7,600 ft. elevation within desert mountains in Kern, Inyo, and San Bernardino Counties to Nevada.

Mojave fishhook cactus was observed during the survey of the alignment at Line 2 Tower 157-4 within the California segment of the Project Area (Attachment A, Figure 7). Mojave fishhook cactus was also observed within the Nevada segment of the Project Area at Line 2 Tower 9-4. Suitable habitat and recent records are present within the California and Nevada segments of the Project Area. An iNaturalist observation of this species within five miles of the Project Area. Based on the presence of suitable habitat, recent nearby records, and observations surveys, Mojave fishhook cactus should be considered present and has a high potential to occur along other portions of the California and Nevada segments of the Project Area.

Cove's cassia (*Senna covesii*). Cove's cassia has a CRPR of 2B.2 and is a perennial desert herb found in California and the southwestern U.S., primarily in Sonoran Desert scrub habitats at 1,050 to 3,740 feet elevation. It grows in dry, sandy washes and slopes and blooms mainly from March to June. In California, it occurs across several southern counties, including Imperial, Riverside, San Bernardino, San Diego, and Kern (CNPS, 2026).

Cove's cassia was observed during surveys in the Nevada segment of the Project Area. Approximately 15 plants were observed within the McCullogh Mountain Range (Attachment A, Figure 7). However, this species is not considered special-status in Nevada. It was not observed during surveys in California and has a low potential to occur in the California segment of the Project Area.

Rusby's desert-mallow (*Sphaeralcea rusbyi* var. *eremicola*). Rusby's desert-mallow is recognized as sensitive by the California BLM and has a CRPR of 1B.2. It is a perennial herb in the mallow (Malvaceae) family and blooms in May. It occurs on carbonate soils and washes within creosote bush scrub, blackbush

scrub and Joshua tree woodland communities from about 3,300 to 4,900 feet in elevation in the Clark Mountain range in Inyo and San Bernardino Counties.

Numerous Rusby's desert-mallow was observed during the surveys of the California segment (Attachment A, Figure 7) including in the Clark Mountains and the Ivanpah Valley. Additionally, this species was observed within the Nevada segment. The CNDDB and iNaturalist contain records of Rusby's desert-mallow within five miles of the Project Area. Based on the presence of suitable habitat, recent records, and observations during the surveys, Rusby's desert-mallow should be considered present has a high potential to occur along other portions of California. It is not considered a special-status species in Nevada.

Mormon needle grass (*Stipa arida*). Mormon needle grass has a CRPR 2B.3. It is a perennial grass-like herb in the grass family, and it blooms from May to August. It occurs on rocky, limestone ridges within pinyon/juniper woodland and Joshua tree woodland communities about 3,600-6,100 ft. elevation primarily within the Clark and New York Mountains as well as within the Kingston Range.

Mormon needle grass was not observed during the survey of the alignment. CNDDB and iNaturalist contain records of Mormon needle grass within five miles of the Project Area Records are approximately 1.5 miles north of the Line 1, Tower 34-1 Project Area in the Clark Mountains. Based on the presence of suitable habitat and nearby recent records, Mormon needle grass has a high potential to be present in the California segment of the Project Area. Based on presence of suitable habitat, lack of records, there is a low potential for the species to occur in the Nevada segment of the Project Area. Additionally, it is not considered special status in Nevada.

4.6 Special-Status Wildlife

Special-status taxa include those listed as threatened or endangered under the federal or California Endangered Species Acts, taxa proposed for listing, Species of Special Concern, BLM, or Nevada sensitive, and other taxa which have been identified by the USFWS and or CDFW, that warrant special consideration.

Attachment A, Figure 7 illustrates the known locations of special-status wildlife occurring within or near the Project Area. Table 5 summarizes the special-status wildlife taxa known to regionally occur and their potential for occurrence in the Study Area. The specific habitat requirements and the locations of known occurrences of each special-status wildlife species were the principal criteria used for inclusion in the list of species potentially occurring within the Study Area.

Several species of special-status wildlife identified during the literature review were determined to have a very limited or were not likely to occur in the Project Area. These species were evaluated and were not considered in this BRTR. These included DRECP covered species that were determined to be out of the known range of the species or the project area lacked suitable habitat. These include, Couch's spadefoot toad (*Scaphiopus couchii*), flat-tailed horned lizard (*Phrynosoma mcallii*), Tehachapi slender salamander (*Batrachoseps stebbinsi*), desert pupfish (*Cyprinodon macularius*), Owens pupfish (*Cyprinodon radiosus*), California black rail (*Laterallus jamaicensis coturniculus*), California condor (*Gymnogyps californianus*), gila woodpecker (*Melanerpes uropygialis*), mountain plover (*Charadrius montanus*), sandhill crane (*Grus canadensis tabida*), and Yuma clapper rail (*Rallus longirostris yumanensis*). While some of the avian species may overfly the area, they are not expected to be subject to construction related impacts.

Table 6. Special-Status Wildlife Occurrence Probabilities in the Project Area

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
INVERTEBRATES					
Bombus crotchii Crotch bumble bee	Occurs in open grassland and scrub habitats. This species is a ground nesting species. Occurs in coastal California east to the Sierra-Cascade crest and south into Mexico.	Colony Active Period February - October	FED: none BLM CA: none BLM NV: none CA: CAN, S1S2 NV: none	**Moderate:** This species was not observed during surveys. Suitable habitat is present in some portions of the ROW. The known range is limited to the western portion of the Project Area, between Victorville and Baker. One recent iNaturalist record occurs near Victorville.	**Low:** Suitable habitat is present. This species is not considered special status in Nevada. A recent observation was documented near Las Vegas. However, it is unclear whether this record represents breeding individuals or windblown migrants.
Bombus morrisoni Morrison bumble bee	Requires thistles, bladderpods, sunflowers, lupines, rabbitbrush and clovers as food sources. Occurs from the Sierra-Cascade ranges eastward across the intermountain west.	Active during flight season March - October	FED: none BLM CA: none BLM NV: none CA: SA, S1S2 NV: none	**Moderate:** This species was not observed during surveys. Suitable habitat is present. This species is known from historic records within the vicinity of the Project Area.	**Moderate:** Suitable habitat is present. This species is not considered special-status in Nevada.
Danaus plexippus Monarch butterfly	Inland migration relies on milkweed or other related genera has host plans for larval feeding and for oviposition. Prefer riparian areas, including washes, during migration. Overwintering sites are in coastal areas of CA and tend to be approximately 1.5 miles of Pacific Ocean.	Spring and fall migration	FED: PT BLM CA: none BLM NV: S CA: none NV: none	**Moderate:** This species was not observed during surveys. Limited milkweed and other species are present in scattered locations within the Project Area. Species may be present during spring and fall migration but not overwintering.	**Low:** This species was not observed during surveys. Limited milkweed and other species are present in scattered locations. This species may be present during spring and fall migration but not overwintering.
Eremarionta rowelli bakerensis Baker's desert snail	Other desert snails found in dry rocky slopes, desert scrub.		FED: none BLM CA: none BLM NV: none CA: S1 NV none	**Low:** This species range is extremely limited with very few observations.	**Not Likely to Occur:** This portion of the Project Area occurs outside of its known range.
Helminthoglypta mohaveana Victorville shoulderband	Found among granite boulders and at the base of rocky cliffs. Known only from along the Mojave River in San Bernardino County.	Year-round	FED: none BLM CA: none BLM NV: none CA: SA, S1 NV: none	**Present:** This species was observed during surveys. An occurrence of this species was documented near the Mojave River.	**Not Likely to Occur:** This portion of the Project Area occurs outside of its known range.
Miloderes mercuryensis Mercury weevil	This species is a sand dune obligate. Only Seven known specimens of this beetle. One at the type locality in Mercury and	n/a	FED: none BLM CA: none BLM NV: S CA: none	**Not Likely to Occur:** This portion of the Project Area occurs Outside of its range. Not considered a special-status species in California.	**Not Likely to Occur:** This species is dependent upon sand dunes habitats do not occur in the Project Area. This

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	6 others in similar habitats but further south in Clark County.		NV: S1		portion of the Project Area is outside of its known range.
Plebulina emigdionis San Emigdio blue butterfly	Found in desert canyons & along riverbeds in Inyo, Kern, Los Angeles, and San Bernardino Counties. Host plant is fourwing saltbush and American bird's foot trefoil.	Apr-Sep	FED: none BLM CA: none BLM NV: none CA: SA, S1S2 NV: none	**High:** This species was not observed during surveys. Suitable habitat is present. Recent records have been documented within the vicinity of the Project Area.	**Not Likely to Occur:** This portion of the Project Area occurs outside of its known range.
FISH					
Siphateles bicolor mohavensis Mohave tui chub	Endemic to the Mojave River basin. Requires deep pools, ponds, or slough-like areas and vegetation for spawning.	Year-round	FED: END BLM CA: S BLM NV: none CA: END, FP, S1 NV: none DRECP: C	**Not Likely to Occur:** This species is dependent upon aquatic habitats. No recent records have been documented in the Survey Area.	**Not Likely to Occur:** This portion of the Project Area occurs outside of its known range.
AMPHIBIANS					
Anaxyrus californicus Arroyo toad	Found in semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian and desert wash. Requires sandy banks with willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range. Found in the southern Coast Ranges from northern San Luis Obispo County south to Baja California.	Mar-Jul	FED: END BLM CA: none BLM NV: none CA: SSC, S2S3 NV: none	**Low:** The species was not observed; however, focused surveys were not conducted. CNDDB records document occurrences along the Mojave River south of the Project Area, extending from Highway 15 to Highway 18. No iNaturalist observations were documented within the Project Area. The USFWS range map includes the Mojave River south and extends approximately 7 miles north of the Project Area.	**Not Likely to Occur:** This portion of the Project Area occurs outside of its known range.
Rana draytonii California red-legged frog	Occurs in lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation; requires 11-20 weeks of permanent water for larval development; must have access to aestivation habitat. Occurs along the Coast Ranges from Mendocino County south and in portions of the Sierra Nevada and Cascades ranges.	Year-round	FED: THR BLM CA: none BLM NV: none CA: SSC, S2S3 NV: none	**Not Likely to Occur:** This species is dependent upon permanent deep water and riparian habitats. No recent records have been documented (iNaturalist or CNDDB).	**Not Likely to Occur:** This portion of the Project Area occurs outside of its known range.

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
REPTILES					
Crotaphytus bicinctores Great Basin collared lizard	Occurs mainly in xeric, sparsely vegetated rocky areas, on alluvial fans, lava flows, hillsides, rocky plains, and in canyons; from about sea level to about 7,500 ft	Spring-Fall	FED: none BLM CA: none BLM NV: S CA: none NV: WL, S4	**Present:** This species was observed during surveys. It is not considered a special-status species in California.	**High:** Suitable habitat is present. A recent record was documented within the Project Area.
Diadophis punctatus regalis Regal ringneck snake	Found near moist microhabitats such as springs and intermittent streams in higher elevation desert mountains. Known from the Clark, Providence, and Grapevine Mountain ranges.	Spring-Fall	FED: none BLM CA: none BLM NV: S CA: SSC, S2S3 NV: S3	**Low:** Habitat within the Survey Area is marginal or limited. This species is dependent upon springs and intermittent drainages. Documented occurrences have been recorded in the Clark Mountain area.	**Not Likely to Occur:** Marginal habitat for this species is present within the Survey Area.
Dipsosaurus dorsalis Desert iguana	Inhabits hummocks of loose sand and patches of firm ground with scattered rocks and desert washes creosote bush scrub from below sea level to 3,300 ft.	Spring-Fall	FED: none BLM CA: none BLM NV: S CA: none NV: WL, S3	**Present**: This species was observed during surveys. It is not considered special-status in California.	**High:** Suitable habitat present, however, this species was not observed during surveys. Recent records have been documented within the vicinity of Project Area.
Actinemys pallida Southwestern pond turtle	Inhabits permanent or nearly permanent bodies of water in various habitat types; requires basking sites. Occurs in the California, west of the Sierra-Cascade crest Mojave Desert along the Mojave River and its tributaries.	Year-round	FED: Proposed Threatened BLM CA: S BLM NV: none CA: SSC, S3 NV: none	**Low to Moderate:** This species was not observed during surveys. Potentially suitable habitat is limited to within the Mojave River.	**Not Likely to Occur:** This portion of the Project Area occurs outside of its known range.
Gopherus agassizii Desert tortoise	Inhabits, gravelly desert washes, canyon bottoms, and rocky hillsides. Associated plant species includes creosote bush, Joshua tree, cheesebush, saltbush, grasses, and cacti. Occurs only in California, extreme southern Nevada, extreme southwest Utah, and extreme northwest Arizona.	Spring-Fall	FED: END BLM CA: S BLM NV: S CA: THR, S2S3 NV: TR, S2S3 DRECP: C	**Present:** Individuals, sign of species, and suitable burrows were observed along alignment.	**Present:** Individuals, sign of species, and suitable burrows were observed along alignment.
Heloderma suspectum cinctum Banded Gila monster	Inhabits the lower slopes of rocky canyons and arroyos and desert flats among scrub and succulents. Eggs are laid in soil in excavated nests; soil must be	Spring-Fall	FED: none BLM CA: S BLM NV: S CA: SSC, S1 NV: PR, S2	**Moderate:** Suitable habitat is present. This species was not observed during surveys. Recent records were documented within vicinity of Project Area.	**High:** Suitable habitat is present. Likely to be found in the McCullough Mountains. Not observed during surveys.

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	sandy or friable. Inhabits the eastern Mojave and Colorado Deserts.				Records within approximately one mile of Project Area.
Phrynosoma blainvillii Coast horned lizard	Inhabits coastal sage scrub and chaparral in arid and semi-arid climate zones; prefers friable, rocky, or shallow sandy soils; requires native ant food source. Pacific coast to the deserts and the Sierra Nevada, north to the Bay Area, and south into Baja California.	Spring-Fall	FED: none BLM CA: S BLM NV: none CA: SSC, S3S4 NV: none	**Not likely to occur:** No suitable habitats occur within the Project Area. Records for this species in the area are historic, and the Project Area Is located on the edge of the species' geographic range.	**Not Likely to Occur:** This portion of the Project Area occurs outside of its known range.
Phrynosoma platyrhinos Desert horned lizard	Inhabits open sandy areas in deserts, chaparral, grasslands, often near ant hills. Occurs across the western U.S.	Spring-Fall	FED: none BLM CA: none BLM NV: none CA: none NV: S4	**Present**: This species was observed during surveys and is not considered special-status in California.	**High:** Suitable habitat is present and recent records have been documented within the Project Area.
Sauromalus ater Common chuckwalla	Inhabits rocky desert; lava flows, hillsides, and outcrops, with creosote bush; individuals seek shelter in rock crevices; occurs across the southwestern U.S.	Spring-Fall	FED: none BLM CA: none BLM NV: S CA: S4 NV: S3	**Present:** This species was observed during surveys and is not considered special-status in California.	**Present:** This species was observed during surveys.
Uma scoparia Mojave fringe-toed lizard	Requires fine, loose, wind-blown sand in sand dunes, dry lakebeds, riverbanks, desert washes, sparse alkali scrub, and desert scrub. Shrubs or annual plants may be necessary for arthropods found in the diet. Occurs in desert regions of Inyo, San Bernardino, Los Angeles, and Riverside counties Elevational range extends from near sea level up to 3,000 ft.	Mar-Oct	FED: none BLM CA: S BLM NV: none CA: SSC, S3S4 NV: PR DRECP: C	**Present:** Not observed during initial surveys in 2021 and 2024. However, this species was observed in 2025. Suitable habitat is present within isolated portions of the Project Area.	**Low:** This species has limited distribution in Nevada.
BIRDS					
Accipiter cooperii Cooper's hawk	Woodland, chiefly of open, interrupted, or marginal type; nest sites mainly in riparian growths of deciduous trees. Breeds in southern Sierra Nevada foothills, New York	Year-round	FED: none BLM CA: none BLM NV: none CA: WL, S4 NV: S5	**Moderate (Nesting):** No nests, or suitable nesting habitat was observed within Project Area. **Present (Foraging):** This species was observed during surveys**.**	**Moderate (Nesting):** No nests, or suitable nesting habitat was observed within Project Area. **Present (Foraging):** This species was observed during

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	Mts., Owens Valley, and other local areas in southern California and Nevada.				surveys. Suitable wintering habitat occurs throughout Project Area.
Agelaius tricolor Tricolored blackbird	Highly colonial species requires open water, protected nesting substrate, and foraging areas with insect prey within a few kilometers of colony. Occurs throughout Central Valley and in coastal districts from Sonoma County south.	Year-round	FED: BCC BLM CA: S BLM NV: none CA: THR, SSC, S1S2 NV: S1B DRECP: C	**Low (Nesting):** No nests or suitable nesting habitat is present within the Project Area, except where tower lines cross over the Mojave River. **High (Foraging):** Suitable foraging habitat occurs within 500 feet of Survey Area.	**Not likely to occur (Nesting):** No nests, or suitable nesting habitat was observed within Project Area. **Low (Foraging):** No suitable foraging habitat occurs within the Project Area.
Aquila chrysaetos Golden eagle	Nests in remote trees and cliffs; but will also use transmission line towers. Forages over shrublands and grasslands; breeds throughout western North America, winters to east coast.	Year-round	FED: BGEPA, BCC BLM CA: S BLM NV: S CA: FP, WL, S3 NV: SB DRECP: C	**Present (Nesting):** Suitable nesting habitat is present within mountainous portions of the Project Area. This species was observed nesting adjacent to the existing ROW near the Ord Mountains. **Present (Foraging):** This species was observed during surveys. Suitable foraging habitat occurs throughout the Project Area.	**High (Nesting):** No nests were observed during surveys. However, suitable nesting habitat occurs, and nesting is known to occur in the mountainous portions of the Project Area. **Present (Foraging):** Two individuals were observed together during surveys. Suitable foraging habitat occurs throughout the Project Area.
Athene cunicularia hypugaea Western burrowing owl	Nests primarily in rodent burrows, most commonly those excavated by ground squirrels or other fossorial mammals, within open grassland or shrubland communities. This species forages in open habitats with low vegetation. Burrowing owl occurs throughout much of California, as well as across the western U.S. and Mexico.	Year-round	FED: BCC BLM CA: S BLM NV: S CA: Candidate, S3 NV: S3B DRECP: C	**Moderate (Nesting):** This species is known to nest in the Mojave Desert. **Present (Foraging/Overwintering):** This species was observed during surveys of the Project Area. Observations included potential and sign. Suitable year-round habitat is present within the Project Area.	**Moderate (Nesting):** This species is known to nest in the Mojave Desert. **Present (Foraging/Overwintering):** The Project Area provides potential burrows that may support this species that was observed during surveys. Suitable year-round habitat is present within the entire Project Area.
Auriparus flaviceps Verdin	Occur in desert scrub or chaparral with thorny trees along washes with catclaw, paloverde, mesquite, tamarisk, juniper, ironwood, creosote bush, hackberry, smoke tree,	Year-round	FED: none BLM CA: none BLM NV: S CA: none NV: TL, S3	**High (Nesting):** No nests were observed during surveys. **Present (Foraging):** This species was observed foraging. It is not considered special status in California.	**High (Nesting):** This species was not observed during surveys. Suitable nesting habitat present. **High (Foraging):** Suitable foraging habitat is present in

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	desert lavender, willows, or oaks are present. In Permanent residents of arid habitats in Mexico and deserts of the southwest of the U. S.				the Project Area. Recent records of this species were documented within the vicinity of the Project Area.
Buteo swainsoni Swainson's hawk	Forages in open grasslands, agricultural areas, sparse shrublands, and small open woodlands. Nests in Western Antelope, San Joaquin, and Owens Valleys in scattered trees within grasslands, shrublands, or agricultural landscapes.	Spring-Fall	FED: BCC BLM CA: S BLM NV: S CA: THR, S3 NV: S3B DRECP: C	**Not Likely to Occur (Nesting):** This species does not breed within region. **Present: (Foraging/Migration):** A flyover of this species was observed incidentally during surveys.	**Not likely to occur (Nesting):** Does not breed within region. **Present (Foraging/Migration):** A flyover of this species was observed incidentally during surveys.
Calypte costae Costa's hummingbird	Inhabits Mojave Desert scrub, chaparral, sage scrub, deciduous forest, desert scrub and streams with cottonwoods, brittlebush, fourwing saltbush, and other species from near sea level to 4,000 ft. elev. Breeds in SW North America from central California, southern Nevada, and southwestern Utah. Winters Baja California and coastal Mexico.	Year-round	FED: BCC BLM CA: none BLM NV: none CA: S4 NV: S3	**High (Nesting):** No nests were observed were observed within the Project Area; however, suitable nesting habitat occurs throughout the Project Area. **Present (Foraging):** This species was observed during surveys. Suitable foraging habitat occurs throughout the Project Area.	**High (Nesting):** No nests were observed. However, suitable nesting habitat occurs throughout the Project Area. **High (Foraging):** Suitable foraging habitat occurs throughout Project Area.
Circus hudsonius Northern harrier	Forages and breeds in annual and perennial grasslands, weed fields, agricultural fields, sagebrush flats, and desert sinks, among others. Occurs across North America, breeding from northern Alaska and Canda south through much of U.S. and northern Baja California. Occurs year-round or during migration throughout open habitats across California and Nevada.	Year-round	FED: BCC BLM CA: none BLM NV: none CA: SSC, S3 NV: none	**Moderate (Nesting):** Limited suitable nesting habitat is present within the Project Area, and the area falls outside the known breeding range of this species **Moderate (Foraging):** Suitable foraging habitat present within the Project Area. Multiple records occur within 5 miles.	**Not Likely to Occur (Nesting):** The Project Area falls outside of the known breeding range for this species. **Moderate (Foraging):** Suitable foraging habitat present. Multiple records occur within 5 miles.
Coccyzus americanus occidentalis Western yellow-billed cuckoo	Nests along broad, lower flood-bottoms of larger river systems; also nests in riparian forests of willow often mixed with cottonwoods, with an	May-Sep	FED: THR, BCC BLM CA: S BLM NV: S CA: END, S1 NV: SB, TB	**Low (Nesting):** No nests or suitable nesting habitat was observed within the Project Area, except along portions of the Mojave River.	**Not Likely to Occur (Nesting)**. No suitable breeding habitat observed within the Project Area.

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	understory of blackberries, nettles, or wild grapes. Occurs across western U.S. Within the vicinity of the Project Area occurs along the Mojave River.		DRECP: C	**High (Foraging):** Suitable foraging habitat is present within the Project Area at the Mojave River. iNaturalist records occur near Clark Mountain over one mile from the Project Area.	**Not Likely to Occur (Foraging):** No suitable foraging habitat is present within the Project Area.
Colaptes chrysoides Gilded flicker	Occurs in desert riparian, desert wash, and Joshua tree habitats with large mature trees for nesting. Occurs in SE California, NE Baja California, and central Arizona south to southern Baja California and through Sonora to northern Sinaloa.	Year-round	FED: BCC BLM CA: S BLM NV: S CA: END, S1 NV: S1	**High (Nesting):** Suitable nesting habitat is present on the eastern end of Project Area in the Clark Mountains and in Ivanpah Valley. **Present (Foraging):** Observed during surveys near Clark Mountains.	**Low (Nesting):** Limited suitable habitat was observed. **Moderate (Foraging):** Limited suitable habitat was observed.
Empidonax traillii Willow flycatcher	This species primarily nests within willow thickets along streams in broad valleys, canyon bottoms, mountain-side seepages, and at the margins of lakes and pools. Willow flycatchers can also be found within bushes, brushy fields, and upland stands of trees near streams or marshes. In California, the current breeding distribution is largely restricted to northern California, particularly within the Sierra Nevada and Cascade Mountains region, extending from southern Shasta County to northern Kern County.	Apr-Sep	FED: none BLM CA: none BLM NV: none CA: END, S3 NV: none	**Moderate (Nesting):** No nests were observed. Suitable nesting habitat is present within 500-feet of Survey Area along the Mojave River. The nearest records were documented near Baker and Zzyzx. **High (Foraging):** Suitable nesting and foraging habitat is present along the Mojave River.	**Not Likely to Occur (Nesting):** No suitable breeding habitat is present within the Project Area. **Low (Foraging):** No suitable habitat is present within the Project Area.
Empidonax traillii extimus Southwestern willow flycatcher	Occurs in riparian woodlands in southern California. Breeding range includes southern California, southern Nevada, southernmost Utah, southernmost Colorado, Arizona, New Mexico, and western Texas. Designated Critical Habitat along the Mojave River between Victorville Switching station and	Apr-Sep	FED: END BLM CA: none BLM NV: S CA: END, S1 NV: EB, S1B DRECP: C	**Moderate (Nesting):** No nests were observed. Suitable nesting habitat is present within 500-feet of the Survey Area in the Mojave River. **High (Foraging):** Suitable foraging habitat present within 500-feet of the Project Area along the Mojave River. Numerous CNDDB records occur along the Mojave River, including several occurrences documented by eBird and iNaturalist.	**Not Likely to Occur (Nesting):** No suitable breeding habitat is present within the Project Area. **Low (Foraging):** No suitable habitat is present within the Project Area.

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	towers north-east of Mojave River.				
Falco mexicanus Prairie falcon	Nests along cliff faces or rocky outcrops, forages over open spaces, agricultural fields. Occurs throughout arid western U.S. and Mexico.	Year-round	FED: BCC BLM CA: none BLM NV: none CA: WL, S4 NV: S4	**Moderate (Nesting):** No nests were observed during the surveys, and marginal nesting habitat is present throughout most of the Project Area. However, this species could occur in mountainous areas. **Present (Foraging):** This species was observed during surveys. Suitable foraging habitat is present throughout the Project Area. Multiple eBird records within the vicinity of the Project Area.	**Moderate (Nesting):** No nests were observed. This species could occur in mountainous areas. **High (Foraging).** Suitable foraging habitat is present throughout the Project Area. Multiple eBird records within vicinity of the Project Area.
Falco peregrinus Peregrine falcon	Occurs near wetlands, lakes, rivers, or other water; nests on cliffs, banks, dunes, mounds; also, human-made structures. Occurs across North America.	Year-round	FED: D, BCC BLM CA: none BLM NV: S CA: S3S4 NV: SB, S3	**Low (Nesting):** No nests were observed during surveys, and marginal nesting habitat is present throughout most of the Project Area. This species could occur in mountainous areas. **Present (Foraging):** This species was observed during surveys in California. Suitable foraging habitat is present throughout Project Area. Multiple eBird records within the vicinity of the Project Area.	**Low (Nesting):** No nests observed, marginal nesting habitat present within most of the Project Area. Could occur in mountainous areas. **High (Foraging):** Suitable foraging habitat occurs throughout the Project Area. Multiple eBird records within the vicinity of the Project Area.
Icteria virens Yellow-breasted chat	Inhabits riparian thickets of willow and other brushy tangles near water courses; nests in low, dense riparian vegetation; nests and forages within 10 feet of ground. Widespread in North America.	May-Aug	FED: none BLM CA: none BLM NV: none CA: SSC, S3 NV: S3	**Moderate (Nesting):** No nests were documented within Project Area. Suitable nesting habitat is present approximately 500-feet from the Survey Area in the Mojave River. **High (Foraging):** Suitable habitat is present within 500-feet of Survey Area. Records of this occur along the Mojave River. No suitable habitat occurs in the vicinity of the tower locations.	**Not Likely to Occur (Nesting)**: No nests or nesting habitat is present within most of the Project Area. **Present (Foraging):** A recent observation was document near Primm.
Junco hyemalis caniceps Gray-headed junco	Inhabits white fir association at 7,300 ft (Clark Mountain); also, from dense pinyons above 6,700 ft elev. (Grapevine Mountains). Summer resident	Apr-Oct	FED: none BLM CA: none BLM NV: none CA: WL, S1 NV: none	**Not Likely to Occur (Nesting):** No nests or suitable nesting habitat occurs within the Project Area.	**Not Likely to Occur (Nesting):** This species is not considered special-status in Nevada.

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	of the Clark and Grapevine Mountains.			**Not likely to occur (Foraging):** No suitable foraging habitat occurs within the Project Area.	**Not likely to occur (Foraging):** No suitable foraging habitat occurs within the Project Area.
Lanius ludovicianus Loggerhead shrike	Occurs in broken woodland, savannah, pinyon-juniper woodland, Joshua tree woodland, riparian woodland, desert oases, scrub, and washes; prefers open areas for foraging. Nesting is widespread in North America.	Year-round	FED: BCC BLM CA: none BLM NV: S CA: SSC, S4 NV: SB, S3	**Present (Nesting):** Suitable nesting habitat was observed throughout the Project Area. **Present (Foraging):** Suitable foraging habitat occurs throughout the entire Project Area. This species was observed during surveys.	**High (Nesting):** Suitable nesting habitat occurs throughout the Project Area. **High (Foraging):** Suitable foraging habitat occurs throughout the entire Project Area.
Leiothlypis luciae Lucy's warbler	Prefers to nests on honey mesquite thickets; will use riparian woodland, blue palo verde, ironwood, and tamarisk. Occurs in the Desert Southwest of the U. S. and northwestern Mexico. Breeding range includes Arizona, southern Nevada, and along the lower Colorado River into adjacent parts of California.	Mar-Aug	FED: BBC BLM CA: S BLM NV: none CA: SSC, S3 NV: S3B	**Moderate (Nesting):** Marginally suitable nesting habitat is present within the Project Area. **Moderate (Foraging):** Marginal suitable foraging habitat is present within the Project Area. Records occur east of Clark Mountain, as well as near Baker and Victorville.	**Low (Nesting)**: No suitable nesting habitat is present within the Project Area. **Moderate: (Foraging**): Marginally suitable habitat is present within the Project Area. Recent records occur near Primm and Jean.
Leiothlypis virginiae Virginia's warbler	Occurs in arid, shrubby, mixed-conifer, pinyon/juniper, montane-chaparral from 7,000-9,000 ft. elev. Nests on arid slopes with stands of tall shrubs/scattered trees, riparian thickets of willow/wild rose along streams. Occurs across western U.S.	May-Aug	FED: BCC BLM CA: none BLM NV: S CA: WL, S2 NV: S3	**Not Likely to Occur (Nesting):** No suitable habitat was observed within the Project Area. **Not Likely to Occur** (**Foraging)**: Marginally suitable habitat is present within the Project Area.	**Not Likely to Occur (Nesting)**: No suitable habitat was observed within the Project Area. **Not Likely to Occur (Foraging):** Marginally suitable foraging habitat is present within the Project Area.
Phainopepla nitens Phainopepla	Occurs in desert, riparian woodlands, and chaparral and open woodlands of oaks and other small trees; associated with mistletoe berries. Relies on mistletoe berries as a primary food source; occurs across the southwestern U.S.	Year-round	FED: none BLM CA: none BLM NV: S CA: none NV: WL, S3	**High (Nesting):** Suitable nesting habitat occurs within the Project Area. **High (Foraging):** This species was observed within drainages in the western Ivanpah Valley.	**High (Nesting):** Suitable nesting habitat occurs within the Project Area. **High (Foraging):** Suitable habitat within Project Area.
Piranga flava Hepatic tanager	Occurs in white fir-pinyon forest on desert peaks, 5,300-8,100 ft. elev. With an understory of xerophytic shrubs. Usually nests	April-Aug	FED: none BLM CA: none BLM NV: none CA: WL, S1	**Not Likely to Occur (Nesting):** No nests or suitable nesting habitat was observed within the Project Area.	**Not Likely to Occur (Nesting):** No nests or suitable nesting habitat were observed within the Project

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	high in conifer or deciduous tree, on outer end of branch, 4.5-15 m above ground.		NV: none	**Low (Foraging).** No suitable habitat was observed within the Project Area. Historic records on the north side of Clark Mountain.	Area. This species is not considered a special-status in Nevada. **Low (Foraging).** No suitable habitat was observed within the Project Area.
Piranga rubra Summer tanager	Requires cottonwood-willow riparian for nesting and foraging; prefers older, dense stands along streams. Summer resident across much of the U.S.	Apr-Sep	FED: none BLM CA: none BLM NV: none CA: SSC, S1 NV: S2	**Moderate (Nesting):** No nests or suitable nesting habitat occurs within the Project Area. Suitable nesting habitat occurs within 500' of the Survey Area along the Mojave River. **Moderate (Foraging):** No suitable foraging habitat is present within Project Area. Suitable habitat occurs within 500-feet of the Survey Area along the Mojave River.	**Not Likely to Occur (Nesting):** No nests or suitable nesting habitat was observed within the Project Area. **Not Likely to Occur (Foraging):** No habitat suitable for foraging was observed within Project Area.
Pyrocephalus rubinus Vermilion flycatcher	Inhabits desert riparian adjacent to irrigated fields, irrigation ditches, pastures, and other open, mesic areas. Breeds across the southwest into middle America.	Year-round	FED: none BLM CA: none BLM NV: none CA: SSC, S2S3 NV: S2	**Moderate (Nesting):** No nests were observed during surveys. Marginal nesting habitat occurs within the Project Area. Multiple eBird records were documented within the vicinity of the Project Area during the breeding season. Suitable nesting habitat occurs within 500' of the Survey Area along the Mojave River. **Moderate (foraging):** Marginally suitable foraging habitat occurs throughout the Project Area. Multiple records were documented within vicinity of Project Area near Barstow.	**Low: (Nesting):** No nests were observed during surveys. Marginal nesting habitat is present within the Project Area. **Low:** (**Foraging**) Marginally suitable foraging habitat occurs within the Project Area.
Setophaga petechia Yellow warbler	Occurs in riparian plant associations; prefers willows, cottonwoods, aspens, sycamores, and alders for nesting and foraging. Widespread across North America.	Apr-Aug	FED: BCC BLM CA: none BLM NV: none CA: SSC, S3S4 NV: S3	**Moderate (Nesting):** No nests or suitable nesting habitat occurs within the Project Area. Suitable nesting habitat is present within 500' of Survey Area along the Mojave River. **High (Foraging):** No suitable foraging habitat occurs within the Project Area. Suitable foraging habitat is present within 500' of Survey Area. Records of species were documented along the	**Not Likely to Occur (Nesting):** No nests or suitable nesting habitat occurs within the Project Area. **Low (Foraging):** No suitable foraging habitat occurs within the Project Area. This species is not considered special-status in Nevada.

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
				Mojave River. Reports of this species occur within the Mojave Narrows Regional Park, downstream of the Project Area. No suitable habitat occurs in the immediate vicinity of the tower locations.	
Spizella breweri Brewer's sparrow	Common summer resident and breeder east of the Cascade-Sierra Nevada crest, in mountains and higher valleys of Mojave Desert; nests in treeless shrub habitats with moderate canopy, especially in sagebrush; migrants in California occur mostly in September - October and April - May.	Localized breeding Apr-Jul	FED: None BLM CA: none BLM NV: S CA: S4 NV: SB	**High (Nesting):** Suitable foraging habitat occurs within the Project Area. Multiple records were documented within the vicinity of the Project Area. **High (Foraging):** This species was observed during the surveys. Suitable foraging habitat occurs within the Project Area. Multiple records were documented within the vicinity of Project Area.	**Moderate (Nesting):** Suitable nesting habitat occurs within the Project Area. Multiple records were recorded within the vicinity of the Project Area. **Present (Foraging):** Suitable foraging habitat is present within Project Area. Multiple records of this species were documented within vicinity of Survey Area. This species was observed during site surveys.
Toxostoma bendirei Bendire's thrasher	Breeding range is patchily distributed and extends from southern Nevada, Utah, and Colorado south through southeastern California, Arizona, and western New Mexico; abundance can vary greatly in response to climatic variables. Occurs in flat areas of desert succulent shrub/Joshua tree habitats in Mojave Desert. Nests in cholla, yucca, palo verde.	Feb-Aug	FED: BCC BLM CA: S BLM NV: S CA: Candidate, S3 NV: TL, S1B DRECP: C	**High (Nesting):** Suitable nesting habitat occurs within portions of the Project Area. **High (Foraging):** The Project area supports suitable foraging habitat for this species. Multiple eBird records were documented within the vicinity of Project Area.	**Moderate (Nesting):** Suitable nesting habitat occurs within portions of the Project Area. **High (Foraging):** Suitable foraging habitat occurs within portions of the Project Area. Multiple records were recorded within the vicinity of Project Vicinity.
Toxostoma crissale Crissal thrasher	Resident of southeastern deserts in desert riparian and desert wash habitats Nests in dense vegetation along streams/washes; mesquite, screwbean mesquite, ironwood, catclaw, acacia, and willow. Occurs across southwestern North America to central Mexico.	Year-round	FED: none BLM CA: S BLM NV: S CA: SSC, S3 NV: WL, S3	**Moderate (Nesting):** No nests were observed; however, suitable nesting habitat occurs within the Project Area. **Present (Foraging):** This species was observed during surveys. Suitable foraging habitat occurs within the Project Area. Multiple records were recorded within the vicinity of the Project Area.	**Moderate (Nesting)** No nests were observed; however, suitable nesting habitat occurs within the Project Area. **High (Foraging):** Suitable foraging habitat occurs within the Project Area. Multiple records were recorded within the vicinity of the Project Area.

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
Toxostoma lecontei LeConte's thrasher	Occurs in sparse desert scrub such as creosote bush, Joshua tree, and saltbush scrubs, or sandy-soiled cholla-dominated vegetation. Nests in dense, spiny shrubs or densely branched cactus in desert wash habitat. Mojave and Colorado deserts, east to Nevada, Utah, and Arizona.	Year-round	FED: BCC BLM CA: none BLM NV: S CA: Candidate S3 NV: TL, S2	**High (Nesting):** No nests were observed. However, suitable nesting habitat occurs within the Project Area. **Present (Foraging):** A pair was observed foraging within the Project Area. Suitable foraging habitat for this species is present throughout the Project area.	**Present (Nesting):** A nest containing eggs was documented near a tower within the Project area. Suitable nesting habitat occurs within the Project Area. **Present (Foraging)**. Suitable foraging habitat occurs within the Project Area.
Vireo bellii pusillus Least Bell's vireo	Summer resident of southern California in low riparian habitats in vicinity of water or dry river bottoms; found below 2,000 ft. elev.; nests placed along margins of bushes or on twigs projecting into pathways, usually willow, and mesquite. Breeds in Central Valley south to the south to Baja California.	Mar-Sep	FED: END BLM CA: none BLM NV: none CA: END, S2 NV: none	**Moderate (Nesting):** Suitable nesting habitat occurs within the Project Area along the Mojave River. Not detected during protocol surveys conducted in 2026. **High (Foraging):** Least Bell's Vireo Habitat Suitability Model shows low to very high along the Mojave River within 500-feet of the Project Area. Records along the Mojave River occur within 1,000-feet of the Project Area.	**Low (Nesting/Foraging):** The Project area is Outside of the known range for this species.
Vireo vicinior Gray vireo	Dry chaparral; west of desert, in chamise-dominated habitat; mountains of Mojave Desert, associated with juniper & sagebrush. Found across the southwest portion of North America.	Mar-Sep	FED: BCC BLM CA: S BLM NV: none CA: SSC, S2 NV: WL, S3B	**Low (Nesting):** No nests or suitable nesting habitat was observed during surveys. Breeding population in East Mojave Peaks Important Bird Area, where the species occupies steep slope canyons. **Low (Foraging):** This species was not observed during surveys. Suitable foraging habitat was observed in the Project Area.	**Low (Nesting):** No nests or suitable nesting habitat was observed during surveys. **Low (Foraging):** Marginal foraging habitat occurs throughout the Project Area.
Xanthocephalus xanthocephalus Yellow-headed blackbird	Occurs in wetlands in prairies, mountain meadows, quaking aspen parklands, and shallow areas of marshes, ponds, and rivers. Breeds across North America and winters in California south to Central America.	Spring-Fall	FED: none BLM CA: none BLM NV: none CA: SSC NV: none	**Not Likely to Occur (Nesting):** This species is not known to breed within region. **Present (Foraging/Migration):** Foraging habitat occurs within the Project Area and are known to migrate through the region. Records of this species have been documented within vicinity of Project Area. This species was observed during surveys.	**Not Likely to Occur (Nesting):** This species is not known to breed within the region. **High (Foraging):** Foraging habitat occurs within the Project Area and is known to migrate through the region.

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
MAMMALS					
Antrozous pallidus Pallid bat	Occurs in desert, grassland, shrubland, woodland, forest; most common in open, dry habitats with rocky areas for roosting; very sensitive to disturbance of roosting sites., below about 6,000 ft. elev.; hibernates in winter. Occurs in southwest U.S.	Spring-Fall	FED: none BLM CA: S BLM NV: S CA: SSC, S3 NV: PM, S3 DRECP: C	**Low (Roosting):** Marginally suitable roosting habitat occurs within the Project Area. Roosting may also occur in adjacent areas. **Moderate (Foraging):** Suitable foraging habitat for this species occurs within the Project Area. No recent records occur within the Project Area.	**Low (Roosting):** Marginally suitable roosting habitat occurs within the Project Area. Roosting may also occur in adjacent areas. **Moderate (Foraging):** Suitable foraging habitat occurs within the Project Area.
Bassariscus astutus Ringtail	Rocky outcrops, canyons, or talus slopes in deserts, chaparral; woodlands of oak, pinyon pine, and juniper; montane conifer forests; and especially riparian for the abundant prey. From sea level up to 9,500 ft. (2,900 m) but most common below 4,600 ft. Nest in rock recesses, logs, tree hollows, and man-made enclosures. Found throughout northwestern California.	Year-round	FED: none BLM CA: none BLM NV: none CA: FP; S3 NV: none	**Moderate-High:** Suitable habitat occurs within the Project Area; however this species requires access to perennial water sources, which limits the distribution of this species in the Project Area. Known from the Clark Mountains.	**Moderate-High**: This species does not have special-status in Nevada. Suitable habitat to support this species was observed within the Project Area during surveys.
Chaetodipus fallax pallidus Pallid San Diego pocket mouse	Occurs in desert scrub, desert succulent scrub, pinyon, and juniper woodland; prefers sandy, herbaceous areas, association with rocks or coarse gravel. Occurs in portions of Riverside and San Bernardino counties.	Year-round	FED: none BLM CA: none BLM NV: none CA: SSC, S3S4 NV: none	**Low:** Suitable habitat occurs within the Project Area. No recent records have been documented within the vicinity of the Project Area.	**Not likely to Occur**: The Project Area occurs outside of geographical range of the species. This species is not considered special-status in Nevada.
Chaetodipus penicillatus Desert pocket mouse	Occupy sandy desert-scrub habitats across the Mojave and Sonoran Deserts. Prefer open areas with sparse vegetation in desert succulent shrub, desert scrub, and alkali desert scrub with sandy, or silty soils along desert washes, and valleys.	Year-round	FED: none BLM CA: none BLM NV: S CA: none NV: S1S2, T	**Moderate**: Suitable habitat occurs within the Project Area. This species is not considered special-status in California.	**Moderate:** Suitable habitat occurs within the Project Area. Historic records were documented within approximately one mile of the Project Area.
Corynorhinus townsendii Townsend's big-eared bat	Occurs in many habitats, day roosts in caves, tunnels, mines, feeds primarily on moths. Range	Year-round	FED: none BLM CA: S BLM NV: S	**Low (Roosting):** Marginally suitable roosting habitat occurs within the Project Area.	**Low (Roosting):** Marginally suitable roosting habitat occurs within the Project Area.

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	includes western North America from southern British Columbia south to the Isthmus of Tehuantepec (Mexico).		CA: SSC, S2 NV: SM, S2 DRECP: C	**High (Foraging).** Suitable foraging habitat occurs and recent records have been documented within the Project Area.	**Low (Foraging).** Suitable foraging habitat occurs within Project Area.
Erethizon dorsatum North American porcupine	Forested habitats in the Sierra Nevada, Cascade, and Coast ranges, with scattered observations from forested areas in the Transverse Ranges. Widely distributed across northern North America	Year-round	FED: none BLM CA: none BLM NV: none CA: SA, S3 NV: S5	**Not Likely to Occur:** No suitable habitat occurs within the Project Area.	**Not Likely to Occur:** No suitable habitat occurs within the Project Area.
Euderma maculatum Spotted bat	Forage in areas open desert, dry desert canyons, forest edges, riparian marsh, and mesquite bosque areas. Roosts on large cliff faces, and rocky outcrops; low desert habitats to high elevations. Feeds primarily on moths. Found across western U.S.	Spring-Fall.	FED: none BLM CA: S BLM NV: S CA: SSC, S3 NV: PM, S2	**Not Likely to Occur (Roosting):** Marginally suitable roosting habitat occurs within the Project Area and could potentially occur in the region. **Moderate (Foraging):** Suitable foraging habitat occurs in the Project Area.	**Not Likely to Occur (Roosting):** Marginally suitable roosting habitat occurs within the Project Area. Could occur in region. **Moderate (Foraging):** Suitable foraging habitat occurs in the Project Area.
Lasionycteris noctivagans Silver-haired bat	Forest habitats, riparian corridors; including southern California mountains; Pinyon–juniper woodlands; roosts hollow trees, under bark, rock crevices; migrates.	Spring and fall migration period	FED: none BLM CA: none BLM NV: S CA: SA, S3 NV: S3, PM	**Not Likely to Occur (Roosting):** Marginally Suitable habitat occurs within the Project Area. **Low (Foraging):** Marginally suitable habitat for foraging is present and no recent records have been documented within the Project Area.	**Not Likely to Occur (Roosting):** Marginally suitable habitat occurs within the Project Area. **Low (Foraging):** Marginally suitable habitat for foraging is present within the Project Area, and no of records have been documented within the Project Area.
Lasiurus cinereus Hoary bat	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense medium to large trees. Feeds primarily on moths and require water. Widespread across North America.	Feb-Nov	FED: none BLM CA: none BLM NV: S CA: SA, S4 NV: TL, S2S3	**Not Likely to Occur (Roosting):** No suitable roosting habitat occurs within the Project Area. **Low (Foraging):** Suitable foraging habitat occurs within the Project Area.	**Not Likely to Occur (Roosting):** No suitable roosting habitat occurs within Project Area. **Low (Foraging):** Suitable foraging habitat occurs within the Project Area.
Macrotus californicus California leaf-nosed bat	Typically roosts in deep mine tunnels, caves, and occasionally buildings or bridges; night roosts may occur in buildings, mines, bridges, rock shelters, or	Spring-Fall	FED: none BLM CA: S BLM NV: S CA: SSC, S1 NV: PM	**Not Likely to Occur (Roosting):** No suitable roosting habitat occurs within the Project Area.	**Not Likely to Occur (Roosting):** No suitable roosting habitat occurs within the Project Area.

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	other sites with overhead protection.		DRECP C	**Low (foraging):** No known records within Project Vicinity.	**Low (foraging):** Marginal suitable habitat in Project Area.
Microtus californicus mohavensis Mohave river vole	Occurs only in weedy herbaceous growth in wet areas along the Mojave River. May be found in some irrigated pastures.	Year-round	FED: none BLM CA: none BLM NV: none CA: SSC, S1 NV: none	**Low:** Suitable habitat within the Project Area occurs near the Mojave River. No recent records were documented within the vicinity of the Project Area.	**Not Likely to Occur**: The Project Area occurs outside of geographical range for this species. This species does not have special-status in Nevada.
Myotis ciliolabrum Western small-footed myotis bat	Typically roosts cliff faces, rocky outcrops, crevices, mines, and trees; Found near rivers, streams, or other water sources. Associated desert scrub, grasslands, pinyon-juniper woodland, pine-fir forests, and agricultural; about 980-10,850 ft elev. Western half of North America.	Year-round	FED: none BLM CA: S BLM NV: S CA: SA, S3 NV: S3	**Not Likely to Occur (Roosting):** Marginally suitable roosting habitat occurs within the Study Area. **Moderate (Foraging):** Marginally suitable foraging habitat present within the Project Area.	**Not Likely to Occur (Roosting):** Marginally suitable roosting habitat occurs within the Project Area. **Moderate (Foraging):** Marginally suitable foraging habitat present within the Project Area.
Myotis yumanensis Yuma myotis	Typically roosts abandoned mines, buildings, bridges, rock crevices, caves, and large trees. Inhabits sagebrush, salt desert scrub, agricultural, playa, and riparian habitat. Forage over open water and riparian corridors.	Late Spring- early Fall	FED: none BLM CA: S BLM NV: S CA: SA, S4 NV: S3	**Not Likely to Occur (Roosting):** Marginal suitable roosting habitat occurs within the Project Area. **Low (Foraging):** Marginally suitable foraging habitat occurs within the Project Area.	**Not Likely to Occur (Roosting):** Marginal suitable roosting habitat occurs within the Project Area. **Low (Foraging):** Marginally suitable foraging habitat occurs within the Project Area.
Ovis canadensis nelsoni Desert bighorn sheep	Open, rocky, steep areas with available water and herbaceous forage desert shrublands to conifer forest, intermountain west, and southwestern regions, as well as northwestern Mexico.	Year-round	FED: none BLM CA: S BLM NV :S CA: FP, S3 NV: GM, S4 DRECP: C	**Present:** Remains and live individuals of this species were observed during surveys. Known to occur in the Clark and Ord Mountains. Suitable habitat is present, and the species is known to occur.	**Present:** This species was observed during surveys. Suitable habitat is present, and the species is known to occur within the Project Area.
Puma concolor Mountain lion	Mountain lions will utilize many habitats within their range including riparian, scrub, chaparral, grassland, and woodland habitats.	Year-round	FED: none BLM CA: none BLM NV: none CA: T (ESU) NV: none	**Moderate:** Suitable habitat is present within the Project Area; however, this species was not observed during surveys. The Project Area is not located in an ESA-designated area.	**Moderate:** Suitable habitat occurs within the Project Area. This species was not observed during surveys and is not considered a special-status species in Nevada.
Tadarida brasiliensis Mexican free-tailed bat	Occupy a wide variety of habitats, ranging from desert communities through pinion-	Spring-Fall	FED: none BLM CA: none BLM NV: S	**Low (Roosting):** Marginally suitable roosting habitat occurs within the Project Area. No recent records were	**Not Likely to Occur (Roosting):** Limited suitable habitat as there are no caves, bridges, or

Special-Status Wildlife Species	Habitat and Distribution	Activity Season	Conservation Status	Potential to Occur in California	Potential to Occur in Nevada
	juniper woodland and pine-oak forests at elevations from sea level to 9,000 ft. elev. Occurs across the U.S. into southern Canada.		CA: SA NV: PM, S4	documented within the vicinity of Project Area. This species could occur in mountainous locations of the Project Area. **High (Foraging):** Suitable foraging habitat is present within Project Area, however, there are no recent records of this species within vicinity of Project Area.	buildings located within the Project Area suitable to support roosting of this species. **Moderate (Foraging):** Suitable foraging habitat is present within Project Area, however, there are no recent records of this species within vicinity of Project Area.
Taxidea taxus American badger	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats with friable soils; require sufficient food source, friable soils, and open, uncultivated ground; prey on burrowing rodents. Widespread throughout California and North America.	Year-round	FED: none BLM CA: none BLM NV: none CA: SSC, S3 NV: S4	**Present:** Suitable habitat is present within the Project Area, and recent records of this species have been documented in the Project Area. Sign including claw marks in a burrow observed during surveys.	**Present:** Remains and digs were observed during surveys. Habitat suitable to support this species occurs within the Project Area. This species is not considered special-status in Nevada.
Vulpes macrotis arsipus Desert kit fox	Arid areas with grasslands, agricultural lands, or scrub areas with scattered shrubby vegetation. Requires open, level areas with loose-textured, sandy loamy soils for digging dens. Found in southwest U.S. and Mexico.	Year-round	FED: none BLM CA: none BLM NV: none CA: SA NV: FM, S4	**Present:** Natal den complexes were observed during surveys. Suitable habitat occurs within the Project Area.	**Present:** Natal den complexes were observed during surveys. Suitable habitat occurs within the Project Area.
Xerospermophilus mohavensis Mohave ground squirrel	Occurs in the Mojave Desert in desert scrub and Joshua tree woodlands with winterfat and hopsage. Occur in the Mojave Desert in San Bernardino, Los Angeles, Kern, and Inyo counties.	Mar-Aug	FED: none BLM CA: S BLM NV: none CA: THR, S2S3 NV: none DRECP: C	**Moderate:** Suitable habitat occurs within the Project Area near Victorville. However, most of the Project Area is outside the known range of species. No recent records were documented within the vicinity of the Project Area. Not detected during 2026 trapping.	**Not Likely to Occur**: This species is not considered special-status in Nevada and is outside of geographical range of species.

References: American Ornithologists Union, 1998 (including supplements through 2013); Barbour and Davis, 1969; BLM, 2019; BLM 2023; BLM 2025, CDFW, 2026; eBird, 2024 and 2026; Feldhammer et al., 2003; Garrett and Dunn, 1981; Hall, 1981; Jennings and Hayes, 1994; iNaturalist, 2024 and 2026; NDNH 2025; Nevada Division of Wildlife (2026); Stebbins, 2003; Wilson and Ruff, 1999; USFWS IPaC 2025/2026.

Federal designations (Fed): (federal ESA, USFWS)

END: Federally listed, endangered.
THR: Federally listed, threatened.
P: Proposed to be listed as threatened or endangered.
BGEPA: Bald and golden eagle protection act.

BCC: Birds of conservation concern.
D: Delisted

Bureau of Land Management (BLM):
S Sensitive: Species recognized by the BLM as sensitive.

State designations (CA): (CESA, CDFW)
END: State listed, endangered.
THR: State listed, threatened.
CAN: State listed, candidate.
SSC: California Species of Special Concern. Considered vulnerable to extinction due to declining numbers, limited geographic ranges, or ongoing threats.
WL: Species that were either previously listed as SC and have not been state listed under CESA; or were previously state or federally listed and now are on neither list; nor are on the list of "Fully Protected" species.
FP: Fully protected.
SA: Special animal. Tracked by the CNDDB as species of conservation concern.

Nevada Division of Natural Heritage:
TR: Threatened Reptile (NAC 503.080.2)
PR: Protected Reptile (NAC 503.080.1)
SM: Sensitive Mammal (NAC 503.030.3)
SB: Sensitive Birds (NAC 503.050.3 and 503.050.4)
TB: Sensitive Birds (NAC 503.050.3 and 503.050.4)
GM: Game Mammal (NAC 503.020)
FM: Fur-bearing Mammal (NAC 503.025)
EB: Endangered Birds (NAC 503.050.2)
WL: Watch List Species
TL: At-Risk Plant and Animal Track List Species

California State Designations: Applied to special-status species; where correct category is uncertain two categories or question marks are used.
S1: Fewer than 6 occurrences or fewer than 1000 individuals or less than 2000 acres.
S2: 6-20 occurrences or 1000-3000 individuals or 2000-10,000 acres (decimal suffixes same as above).
S3: 21-100 occurrences or 3000-10,000 individuals or 10,000-50,000 acres (decimal suffixes same as above).
S4: Apparently secure in California; this rank is clearly lower than S3, but factors exist to cause some concern, i.e., there is some threat or somewhat narrow habitat. No threat rank.

Nevada State Designations: Applied to special-status species; where correct category is uncertain two categories or question marks are used.
S1: Critically Imperiled – At very high risk of extirpation in the jurisdiction due to very restricted range, very few populations or occurrences, very steep declines, severe threats, or other factors.
S2: Imperiled – At high risk of extirpation in the jurisdiction due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors.
S3: Vulnerable – At moderate risk of extirpation in the jurisdiction due to a restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors.
S4: Apparently Secure – At fairly low risk of extirpation in the jurisdiction due to an extensive range and/or many populations or occurrences, but with possible cause for some concern because of local recent declines, threats, or other factors.
S5: Secure – At very low or no risk of extirpation in the jurisdiction due to a very extensive range, abundant populations, or occurrences, with little to no concern from declines or threats.
B: Breeding – Conservation status refers to the breeding population of the element in the nation or state/province

Desert Renewable Energy Conservation Plan (DRECP):
C: Covered (Focus Species)

Special-status wildlife that were detected during the surveys included:

- Desert tortoise (*Gopherus agassizii*) FT, BLM CA: S, BLM NV: S, CA: T, NV: TR,
- Desert Iguana (*Dipsosaurus dorsalis*) BLM NV: S, NV: WL,
- Common chuckwalla (*Sauromalus ater*) BLM NV: S, NV: WL,
- Mojave fringe-toed lizard (*Uma scoparia*) BLM CA: S, CA: SSC, NV: PR,
- Golden eagle (*Aquila chrysaetos*) FED: BGEPA, BCC, BLM CA and NV: S, DRECP: C, CA: FP,
- Burrowing owl (*Athene cunicularia hypugaea*) BLM CA: S, BLM NV: S, CA CESA: CAN; DRECP: C,
- Swainson's hawk (*Buteo swainsoni*) FED: BCC, BLM CA & NV: S, CA: T, DRECP: C,
- Costa's hummingbird (*Calypte costae*) FED: BCC,
- Gilded flicker (*Colaptes chrysoides*) FED: BBC, BLM CA:S, BLM NV: S, CA: END,
- Peregrine falcon (*Falco peregrinus*) FED: D and BBC, BLM NV: S, NV: SB,
- Loggerhead shrike (*Lanius ludovicianus*) BLM NV: S, CA: SSC; NV: SB,
- LeConte's thrasher (*Toxostoma lecontei*) BLM NV: S, CA: SSC, Candidate under CESA,
- Yellow-headed blackbird (*Xanthocephalus xanthocephalus*) CA: SSC,
- Desert bighorn sheep (*Ovis canadensis nelson*) BLM CA: S, BLM NV: S, CA: FP, NV: GM; DRECP: C,
- American badger (*Taxidea taxus*) CA: SSC; and
- Desert kit fox (*Vulpes macrotis arsipus*) CA: SA, FM.

4.7 Candidate, Proposed, Threatened, Endangered, Fully Protected, or Protected Wildlife

Crotch's bumble bee (*Bombus crotchii*). Crotch's bumble bee is a candidate for listing under the California Endangered Species Act (CESA). In October 2018, the Xerces Society for Invertebrate Conservation, Defenders of Wildlife, and the Center for Food Safety submitted a petition to the California Fish and Game Commission to list Crotch's bumble bee, Franklin's bumble bee (*Bombus franklini*), Suckley cuckoo bumble bee (*Bombus suckleyi*), and western bumble bee (*Bombus occidentalis occidentalis*) as endangered under CESA (Xerces et al., 2018). Following an internal review of the petition, CDFW recommended to the California Fish and Game Commission that each of these species be designated as candidates for listing. On June 12, 2019, the Fish and Game Commission designated these four bumble bees as candidate species, affording them the full protection of listing under CESA until a final determination could be made (Hatfield and Jepsen, 2021). The candidacy determination was challenged in court in February 2021, although the Third District Court of Appeal reversed the previous court decision and the candidacy for Crotch's bumble bee was reinstated on September 30, 2022 (CDFW, 2023c).

Crotch's bumble bee is a large bee with a short head and large eyes. The head is predominantly black with a small patch of yellow sometimes appearing at the back. The upper side of the thorax is yellow, merging with a small patch on the head. The lower side of the thorax is black and merges with the first abdominal segment. The most distinguishing characteristic is the broad band of yellow that is present on the second to fourth abdominal segments. The terminal abdominal segments can vary between two different color variations, including completely black or a reddish orange.

Crotch's bumble bees exhibit social behavior, creating colonies of related individuals that cooperate to maintain the health and survival of the colony. Colonies consist of a caste system which includes queens, workers, and reproductive males. New queens emerge during colony establishment, growing season, or reproductive stage. These life stages are defined as the Colony Active Period by CDFW. During each life stage, the colony exhibits different behaviors, including nesting, foraging, and overwintering. The height of the Colony Active Period for Crotch's bumble bee occurs between February and October; however, the timing of a singular nest can be dependent on climate conditions. For example, a nest at lower elevation

with an earlier blooming period will likely be active before a nest with later blooming floral resources at higher elevation (Williams et al., 2014).

Crotch's bumble bees prefer smaller flowers that are abundant with pollen and nectar, such as milkweed (*Asclepias* spp.), chaenactis (*Chaenactis* spp.), deerweed (*Acmispon glaber*), buckwheat (*Eriogonum fasciculatum*), lupines (*Lupinus* spp.), clovers (*Medicago* spp.), phacelias, and sages (*Salvia* spp.) (Williams et al., 2014). However, it has become apparent that this species is more of a generalist forager and will feed on a wide variety of native and non-native plants.

Approximately 30 miles of the Project alignment is within the published range of the species (Attachment A, Figure 8). This commences near the Victorville Switching Station (CDFW, 2023c) and terminates near the community of Baker. Although the Project Area lies within the possible range of Crotch's bumble bee, most observations of the species are to the west and south of the Project Area outside of the Mojave Desert. If present, Crotch's bumble bee is likely to occur in discrete areas where an abundance of foraging resources is present and the occurrence may fluctuate depending on seasonal rainfall and annual plant expression.

Crotch's bumble bees have not been detected by qualified bumble bee surveyors. However, this species is expected to occur at low densities. Surveys are planned for 2026 and would be completed prior to construction of the proposed Project. One iNaturalist observations of Crotch bumble bee is recorded within five miles of the Project area southeast of the Victorville Switching station and there is a detection in the high peaks surrounding Death Valley. There was an observation of this species near Las Vegas, but these may not be breeding animals. Based on suitable habitat and recent observations there is a moderate potential for this species to occur within the western edge of the Project Area near Victorville, California.

Monarch butterfly (*Danaus plexippus*) On December 12, 2024, the USFWS proposed to list the monarch butterfly as threatened under the ESA (USFWS, 2024).

Monarch butterflies are native to North America but can now be found globally. North American migratory monarch butterflies are divided into larger eastern and smaller western populations with the western population is generally found west of the Rocky Mountains. This population can migrate annually up to 300 to 1,000 miles (USFWS, 2025c). Non-migratory populations are found from islands in the Pacific Ocean to the western edge of Europe (USFWS, 2025c). There are also non-migratory monarchs that remain year-round at the southern end of their breeding range in parts of Florida, the Gulf Coast, and California. The western population ranges from portions of northern Mexico, along the western US coast into southern Canada. Each fall monarchs migrate to overwintering sites in coastal areas of the US and portions of Mexico.

Monarch butterflies are generalists and occur in a wide variety of habitats when adequate foraging, larval host plant, roosting, and water resources are available. Monarch butterflies are diurnal migrants, meaning they migrate during the day. At night, migratory individuals roost on trees or shrubs and often form large groups of butterflies. During migration, monarchs prefer riparian areas and rivers for roosting using other water sources such as flood plains, washes, and water sources when available (Morris et al, 2015).

Western US populations migrate each spring from their overwintering sites in the south to suitable breeding habitat where they reproduce throughout the summer wherever suitable host plants. Host plants include a variety of milkweed species of the genera *Asclepius* or other closely related genera is required as host plant for larval feeding and for oviposition (USFW, 2024). Monarchs reproduce via multiple generations throughout the summer, wherever milkweed plants occur. Caterpillars feed and form chrysalises on milkweeds, with the adults emerging in 8-10 days. In California, western monarch

butterflies rely on moderate temperatures and varied landscape for reproduction and breeding (Jepson et al. 2015; USFWS, 2020).

In California, overwintering sites tend to be located within 1.5 miles of the Pacific Ocean and require specific microclimate conditions which include high humidity and appropriate sunlight. Pelton et al. (2016) also noted that monarchs also require nectar sources near the overwintering sites.

The Project Area is outside the known overwintering range for monarch butterflies. However, suitable host plant species are present in the region which provide potential habitat for migratory individuals that may be moving through the area. In addition, milkweed host plants were observed during the botanical surveys including desert milkweed (*Asclepias erosa*), rush milkweed (*Asclepias subulata*), and hairy milkweed (*Funastrum hirtellum*). More broadly, southwestern deserts have suitable habitat for monarch butterflies that includes showy milkweed (*A. speciosa*) and narrow leaf milkweed (*A. fascicularis*) as well as a number of other milkweed species that were less common throughout the range such as woollypod milkweed (*A. eriocarpa*), California milkweed (*A. californica*), and heartleaf milkweed (*A. cordifolia*) (Dilts et al., 2019).

Western monarch butterflies are known to migrate through the Project Area, and the site is mostly within the summer breeding zone. The western terminus of the Project Area is in or near the Early Breeding Zone (USFWS, 2023). However, monarch butterflies rarely breed in the Mojave Desert. Scientific surveys conducted by Grodsky et al. (2020) in the Ivanpah Valley examined use of butterflies on Mojave milkweed (*A. nyctaginifolia*). During spring sampling, no monarch eggs or larvae were found within the sample area while queen butterfly (*Danaus gilippus*) laid 276 eggs on the same plants. This suggests that monarchs do not typically use Mojave Desert habitats for oviposition, likely due to extreme aridity, limited milkweed availability, and seasonal conditions unfavorable for larval development. Nonetheless, recent records of the species have been documented at Zzyzx and Baker, which are within 5 miles of the ROW. It is likely that these records consist of migrant individuals passing through the region to more suitable breeding or overwintering grounds. A few occurrences of monarch butterfly are documented in the Mojave Desert and south of Boulder City, Nevada (iNaturalist, 2026). However, several of the observations appear to be near water sources, for example near the Mojave River near Afton and the Mojave Narrows Regional Park south of the Project site. In California, overwintering sites tend to be located within 1.5 miles of the Pacific Ocean and require specific microclimate conditions which include high humidity and appropriate sunlight. Pelton (2016) also noted that monarchs also require nectar sources near the overwintering sites.

There is no designated critical habitat for monarch butterflies within the proposed Project Area. Designated critical habitat has been proposed within coastal areas of California including Ventura and Santa Barbara Counties. The nearest proposed critical habitat is approximately 120 miles from the Victorville Switching Station in Ventura California.

Southwestern pond turtle (*Actinemys pallida*). The southwestern pond turtle is proposed to be listed as threatened under federal ESA. This species is considered BLM sensitive in California and is a CDFW Species of Special Concern. This species is not found in Nevada. This subspecies occurs from northwestern Baja California north through western California to the central region of the state, where it intergrades with the northwestern pond turtle (*C. m. marmorata*) (Seeliger, 1945; Bury, 1970).

Southwestern Pond turtles inhabit permanent or nearly permanent bodies of water in a wide variety of habitat types. Suitable basking sites, such as partially submerged logs, vegetation mats, or open mud banks are a required element for this subspecies. The southwestern pond turtle is a subspecies of western pond turtle (*C. marmorata*) which represent the only abundant native turtles in California. This species is thoroughly aquatic and possesses a low carapace typically olive, brown, or blackish in color (Stebbins,

2003). The subspecies usually lays a clutch of eggs between April and August as females may move overland up to over 300 feet to find suitable nesting sites. Nests have been observed in many soil types from sandy to very hard and soil must be at least four inches deep for nesting (CDFW, 2008). Most activity is diurnal, but some crepuscular and nocturnal behavior has been observed (CDFW, 2008). Southwestern pond turtles feed on aquatic plants, insects, worms, fish, amphibian eggs and larvae, crayfish, and carrion (Stebbins, 2003).

Overwintering sites include muddy ponds uplands, and other aquatic habitats (Western Pond Turtle Range-wide Conservation Coalition, 2020). During the winter and early spring pond turtles may move between overwintering sites and may occasionally emerge from both terrestrial and aquatic sites (Holland, 1986).

The eastern limits of the western pond turtle range are along the Mojave River near Afton Canyon; however, the Western Pond Turtle Predicted Habitat indicates limited low and moderate habitat with very limited high habitat in Mojave Valley near Harvard Road and Yermo. This species is known to occur along the Mojave River including the area near Victorville. Based on records of occurrence, and presence of limited suitable habitat, southwestern pond turtle has a moderate potential to occur within the California segment of the Project Area at the Mojave River.

Banded Gila monster (*Heloderma suspectum cinctum*). The banded Gila monster is recognized as Sensitive by the California and Nevada BLM, is a Nevada Protected Reptile, and a CDFW Species of Special Concern. The banded Gila monster's range extends from the southwest corner of Utah south through southeastern Nevada into eastern Riverside and San Bernardino Counties in California, south through Arizona to southwestern New Mexico and south into Sonora Mexico (Nafis, 2021). It inhabits the lower slopes of rocky canyons and arroyos with deeply incised topography and are associated with large and relatively high mountain ranges but are also found on desert flats among scrub and succulents. It prefers rocky areas in desert scrub and semi-desert grassland. Found in lower mountain slopes, rocky bajadas, canyon bottoms, and arroyos (Nafis, 2021). Eggs are laid in nest excavated in sandy or friable soils.

Banded Gila monster was not observed in either segment during the surveys. There are no iNaturalist observations of this species within five miles of the Project Area. A recent CNDDB record is approximately 4 miles north of Line 1 Tower 13-1 on the California segment. Based on the presence of suitable habitat and recent records, the banded Gila monster has a moderate potential to be present within the California segment of the Project Area particularly in Xeric riparian communities.

There is a high potential for banded Gila monster to occur within the Nevada portion of the Project Area within the McCullough Mountains due to the presence of suitable habitat. Documented occurrences of this species have been recorded within approximately one mile of Project Area. However, this species was not observed during surveys. NDOW has published information and requirements for this species, "Gila Monster Status, Identification and Reporting Protocol for Observations" (NDOW, 2023).

Desert tortoise (*Gopherus agassizii*). The Mojave population of desert tortoise was federally listed as threatened by the USFWS on April 2, 1990 (55 FR 12178) after an initial emergency listing as endangered on August 4, 1989 (54 FR 32326). The Mojave population includes those animals living north and west of the Colorado River and includes all wild desert tortoises in California (USFWS, 1992). Critical habitat for the desert tortoise was designated in Arizona, Utah, Nevada, and California on February 8, 1994 (59 FR 5820).

In California, the desert tortoise was listed as a threatened species under California Endangered Species Act (CESA) in 1989. On March 23, 2020, the Desert Tortoise Council, the Desert Tortoise Preserve Committee, and Defenders of Wildlife petitioned to change the status of Mohave desert tortoise from

threatened to endangered. CDFW conducted a status review and recommendation to the California Fish and Game commission (CDFW 2026a). On April 2024, the California Fish and Game Commission voted to uplist the desert tortoise to endangered under the California Endangered Species Act (CESA) (Fish and Game Commission, 2024).

In California, the USFWS prepared a draft General Conservation Plan (GCP) and associated draft Environmental Impact Statement (EIS), which was prepared in cooperation with BLM, for the desert tortoises. The purpose of this GCP is to provide an "can increase efficiency and streamline compliance with section 10(a)(1)(B) of the ESA for activities on certain nonfederal lands in the planning area that have the potential to incidentally take desert tortoises." (USFWS, 2024a). Mitigation lands would include "BLM conservation lands California Desert National Conservation Lands [CDNCLs] and areas of critical environmental concern [ACECs]), as identified in the California Desert Conservation Area Plan, as amended by the Desert Renewable Energy Conservation Plan (DRECP; BLM 2016)."

In Nevada, the desert tortoise is "protected" pursuant to Nevada Revised Statue 501.100 and Nevada Administrative Codes (NAC) 503.080. In addition, the Nevada Wildlife Action Plan lists the desert tortoise as a Species of Conservation Priority (NDOW, 2022). At the time the desert tortoise was listed in 1990, available data indicated that populations were declining (USFWS, 2010). Monitoring since that time shows that the downward trend in populations identified at the time of listing is ongoing, but no significant changes in the distribution of the species have been documented (USFWS, 2010; 2011).

This once-widespread and common species is rapidly declining in numbers due to various factors, including the spread of a fatal respiratory disease; predation from ravens and coyotes; mortality associated with roads and off-highway vehicle use; habitat destruction, degradation, and fragmentation.

The desert tortoise is an herbivorous reptile that occurs in the Mojave and Sonoran Deserts in southern California, southern Nevada, Arizona, and the southwestern tip of Utah, as well as Sonora and northern Sinaloa in Mexico. The designated Mojave population of the desert tortoise includes those animals living north and west of the Colorado River in the Mojave Desert of California, Nevada, Arizona, and southwestern Utah, and in the Sonoran (Colorado) Desert in California (USFWS, 2009). Desert tortoises east and south of the Colorado River are now recognized as a distinct species, Morafka's desert tortoise (*G. morafkai*).

The desert tortoise occupies a variety of habitats from flats and slopes, typically characterized by creosote bush scrub at lower elevations, to rocky slopes in blackbrush scrub and juniper woodland ecotones (transition zones) at higher elevations. Tortoises occur most commonly on gently sloping terrain with sandy-gravel soils and where there are herbaceous (non woody) plants and sparse cover of low-growing shrubs. Soil must be friable (easily crumbled) enough for digging burrows, but firm enough so that burrows do not collapse.

During the winter, desert tortoises will opportunistically use burrows, small caves, rock and caliche crevices, or rock overhangs for cover. Hatchling desert tortoises use abandoned rodent burrows for daily and winter shelter (USFWS, 2011). Desert tortoises spend much of their lives in burrows, even during their seasons of activity. In late winter or early spring, they emerge from over-wintering burrows and typically remain active through fall. Activity decreases in summer and is often crepuscular during the hottest times. Tortoises often emerge after summer rainstorms. Activity and movement are generally influenced by temperature and precipitation, which correlate with food and water resources. Extreme high and low temperatures and periods of drought typically result in reduced tortoise activity (Peterson, 1996). Mating occurs during spring and fall. Tortoises are long-lived and grow slowly, requiring 13 to 20 years to reach sexual maturity [at approximately 180 mm midline carapace length (MCL)]. Eggs are generally laid in

friable soil near burrow entrances between April and June and occasionally September and October. Eggs hatch within three to four months (Rostal et al., 1994).

Desert tortoises occupy home ranges, which are generally defined as the area traversed while carrying out a range of normal activities (e.g., foraging and mating) (USFWS, 2011). The size of their home ranges can vary with respect to sex, geographic location, substrate, topography, and climate. Tortoises are philopatric (tending to remain in a particular area), establishing home ranges between 15 and 45 hectares (Barrett, 1990; O'Connor et al., 1994; Harless et al., 2009) depending on region. Home ranges of females are generally smaller than those of males (Duda et al., 1999). Some tortoises have been known to travel great distances, although these movements may occur outside their usual home range (Berry, 1986).

Most of the Project Area is in desert tortoise habitat and traverses the core range of the Mojave population. However, the distribution of desert tortoise varies along the ROW depending on the location. Generally, lower levels of desert tortoise or their sign was found close to Victorville and Barstow which could be characterized by higher levels of human activity and long-term habitat degradation. The highest density of desert tortoise was detected east of Alvord Mountain Road and in the eastern portion of the Project ROW.

This information is consistent with the results of a desert tortoise habitat assessment that was conducted in 2025 to support survey planning. The desert tortoise habitat assessment identified sections of the Project Area that have lower quality desert tortoise habitat compared to other regions of the Project Area. The assessment found:

- Lower quality habitat was present between the Victorville switching station and Dale Evans Parkway; between Dale Evans and Barstow Road; between I-15 and I-40; between I-15 and Alvarado Mountain Road; and near Prim Nevada.
- Higher quality habitat was found between Barstow Road and I-40; between Alvarado Mountain Road and Death Valley Road; between Death Valley Road and the Clark Mountains near Ivanpah; and from State line to the McCullogh Substation.

Generally, the observation of live desert tortoises and their sign was lower in more disturbed habitats and higher in locations that supported more intact habitat or was more remote from human disturbance. Higher densities of desert tortoise were documented in the Ivanpah CHU, and eastern edge of Superior-Cronese CHU, and Ord-Rodman CHU. As expected, higher concentrations of desert tortoise individuals and sign were documented in the Ord-Rodman CHU compared to the segment west of SR-127 to the Mojave River (Attachment A, Figure 9 and 10). In addition, some areas of poor-quality habitat overlap with locations that were identified as low quality desert tortoise habitat in the Maxent model (Nussear et al, 2009).

Desert tortoise distribution was also lower near developed or disturbed areas near Barstow, portions of Daggett between I-40 and I-15, and between I-15 to Alvord Road near Fort Irwin. East of Alvord Road desert tortoise densities increased however there were still large gaps between detections of live animals or their sign. Sign was found close to Victorville which is characterized by higher levels of human activity and long-term habitat degradation. However, west of SR-247 only one live desert tortoise (a large old male) was observed. However, because signs including potential older burrows were observed, other animals may occur in the area. East of Fort Irwin Road desert tortoise densities increased, and the detection of animals and their sign was well distributed along the ROW. East of this location habitat quality and desert tortoise sign increased for most of the alignment with localized areas supporting high concentrations of animals and their sign particularly near the Clark Mountains and in Nevada portions pf the alignment.

For example, during surveys conducted in California during 2025 and 2026, 79 live desert tortoises were observed in the Project Area (Table 7). This included live female, male and juveniles desert tortoise. However, in some instances the sex of the animal could not be determined if the tortoise was in a burrow and partially hidden from full view. In addition, most of these animals appear to be in good health. Desert tortoises were observed walking, including on access and spur roads. One animal was observed on a spur road outside the impact area, but the animal could not cross the road at this location because of existing berms. Desert tortoises were also observed outside and inside burrows including caliche burrows. The highest concentration of caliche burrows was observed between I-40 and SR-247. In addition, there are several caliche ledges that could be used by desert tortoise west of Soda Mountains.

Most living desert tortoise observed appeared to be in good health. In addition, desert tortoise sign in Nevada was abundant and included carcasses, scat, tracks, and numerous burrows, including two burrows with eggshells. In the areas west of I-15 and north of Primm, a few adults appear to be associated with a burrow, and three juveniles were observed in the surrounding area approximately 450 feet to 800 feet from the adults. Desert tortoises were also observed walking on public access roads between Jean and Powerline Road and Powerline Road. In addition, a juvenile desert tortoise was walking on a paved road and a recently deceased desert tortoise with fresh blood that had been killed by non-project related vehicle was observed. Another carcass estimated to be 1 to 2 years old was detected and had potentially been crushed by an off-road vehicle. In addition to vehicle strikes, two carcasses showed signs of raven predation and included a carcass estimated to be less than one year old juvenile desert tortoise, and a juvenile sized carcass estimated to be 1 to 2 years old. Desert tortoise and their sign were observed throughout the entire transmission line alignment and access roads in Nevada.

Table 7. Desert Tortoise Observations and Sign Identified in the Survey Area in 2025 and 2026

Type of Sign[1]	CA/NV	CA/NV	CA/NV	CA/NV	CA/NV	Total
Live						
	Adult Female	Adult Male	Adult Unknown	Juvenile	Unknown	
	3/17	9/11	7/11	4/10	5/2	28/51
Carcass						
	Less than 1 year	1 to 2 years	2 to 4 years	More than 4 years	Other	
	3/2	3/12	7/11	32/22	1/1	46/48
Scat						
	Class 1	Class 2	Class 3	Class 4	Class 5	
	4/23	16/80	19/36	4/18	5/19	48/176
Burrow						
	Class 1	Class 2	Class 3	Class 4	Class 5	
	26/49	52/156	31/108	144/362	182/615	435/1290
Pallet	-	-	-	-	-	52/140
Other signs (tracks)	-	-	-	-	-	0/14
Other non-desert tortoise dens and burrows	-	-	-	-	-	802/241

1. Burrow Class Definition:

Class 1. currently active, with desert tortoise or recent desert tortoise sign;
Class 2. good condition, definitely desert tortoise; no evidence of recent use;
Class 3. deteriorated condition which includes collapsed burrows; definitely desert tortoise;
Class 4. good condition; possibly desert tortoise;
Class 5. deteriorated condition which includes collapsed burrows; possibly desert tortoise.
Scat Class Definition:
Class 1. Wet (not from rain or dew) or freshly dried; obvious odor
Class 2. Dried; with glaze; some odor; dark brown
Class 3. Dried; with no glaze or odor; signs of bleaching (light brown); tightly packed material
Class 4. Dried; light brown to pale yellow; loose material; scaly appearance
Class 5. Bleached; or consisting only of plant fiber
Carcass Class Definition:
Class 1: < 1 year: fresh putrid; scutes mostly adhered; sheen on exposed scutes; unexposed bone waxy and solid.
Class 2: 1-2 years: scutes mostly adhered to bone; exposed scutes pale without sheen; unexposed bone silky.
Class 3: 2-4 years: scutes peeling off bone; unexposed scutes pale and without sheen; no growth ring peeling.
Class 4: more than 4 years: shell bone falling apart; growth rings on scutes peeling; bone fissured.
Pallet:
Evidence of recent use
No evidence of recent use
Other record (including caliche opening)
Other burrows, dens, or features:
Unidentified borrow, den or feature (i.e., predator dig), including evidence of possible use by kit fox, American Badger, coyote, rodent, collapsed burrow, and other features.

Western yellow-billed cuckoo (*Coccyzus americanus occidentalis*). The western yellow-billed cuckoo is listed as federally threatened and designated as endangered in California. The USFWS listed the western distinct population segment (DPS) as threatened on October 3, 2014 (79 FR 59992), and subsequently designated critical habitat on April 21, 2021 (86 FR 20798). This species is also classified as Sensitive by both the Nevada BLM, listed as a Threatened Bird under Nevada Administrative Code 503.050.4, and identified as a covered species under the DRECP.

The western yellow-billed cuckoo is a long-distance migrant though details of its migration patterns are not well known (Hughes, 2015). The summer distribution includes the United States, southeastern Canada, the Greater Antilles, and Mexico (Hughes, 2015). In California, the preferred habitat is willow-cottonwood but will use mesquite habitats for breeding (Laymon and Halterman, 1989). Breeding habitat primarily consists of large blocks of riparian habitat with tall trees, multistoried vegetation understory, and low woody vegetation (79 FR 59992). Isolated patches or narrow linear riparian habitats that are less than 10-20 meters wide have not been documented to be used for nesting but have been documented by single birds during migration (Halterman et al, 2015).

The species has declined throughout its distribution (Wiggins, 2005; Hughes, 2015). In California, yellow-billed cuckoos have declined (Laymon and Halterman, 1989). Laymond and Halterman predicted the pairs of yellow-billed cuckoo within the Mojave River, San Bernardino County, but only found one unmated male. In Nevada, yellow-billed cuckoos have been documented in southern Nevada, but a few records are documented (Tomlinson and Halterman, 2003; as cited in Wiggins, 2005). Habitat destruction, modification, and degradation of riparian habitat are the primary reasons for the decline in the populations (USFWS, 2014). Riparian habitats can be impacted by surface and ground water diversions, channelization and bank stabilization such as flood control structures, non-native species, and other factors (USFWS, 2014).

Western yellow-billed cuckoo was not observed during surveys, but suitable breeding habitat is located along the Mojave River within 500 feet of the Project Area near the Victorville Switching Station. The CNDDB contains records along the Mojave River, and an iNaturalist record is near Clark Mountain that is approximately two miles from the Project Area. Based on the presence of suitable habitat within 500 feet

of the Project Area, western yellow-billed cuckoo has low potential to breed but a high potential to forage within the California segment of the Project Area.

Southwestern willow flycatcher (*Empidonax traillii extimus*). The southwestern willow flycatcher is listed as both a federally and a California endangered species. It is considered Sensitive by the BLM in Nevada is an NDNH Endangered Bird. It is a covered species under DRECP. Designated critical habitat was initially designated on July 22, 1997. Several revisions and redesignated critical habitat led to the final rule of designated critical habitat on January 3, 2013 (78 FR 344).

Southwestern willow flycatcher is a riparian obligate, typically occurring in areas of dense vegetation and flowing water, or in areas with high soil moisture. Vegetation characteristics typical of breeding habitat include dense tree or shrub cover that has a minimum height of 10 feet with dense twig structure and leaf density. Southwestern willow flycatchers have been documented to use a variety of riparian habitat types for breeding ranging from monotypic stands of willow (*Salix* spp.) to mixed stands of native broadleaf trees and shrubs or mixtures of native broadleaf trees and shrubs cottonwood (*Populus* spp., willows, boxelder (*Acer negundo*), ash (*Fraxinus* spp.), alder (*Alnus* spp.), and buttonbush (*Cephalanthus* spp.). Vegetation in the herbaceous plant layer includes very dense areas of sedges, rushes, nettles, and other riparian or wetland species (Sogge et al, 2010). Southwestern willow flycatcher begins nesting around mid-May and fledges young in early to mid-July (USFWS, 1995).

Vegetation surrounding the riparian habitat can include open meadows, agricultural lands, pine forests, and upland shrubs. Breeding occurs across a wide elevational range ranging from sea level to 8,500 feet amsl and includes southern California, southern Nevada, southernmost Utah, southernmost Colorado, Arizona, New Mexico, and western Texas. In southern California and Nevada southwestern willow flycatchers generally arrive to their breeding grounds in April and remain until September when migration to overwintering begins (USGS, 2010).

Southwestern willow flycatcher was not observed during surveys, but suitable breeding habitat is located along the Mojave River 500 feet from the Project Area. The CNDDB contains one record of southwestern willow flycatchers within five miles of the Project Area from 1990 (CDFW, 2021). There are no iNaturalist observations of southwestern willow within five miles of the Project Area. Recent eBird records for the species are present along the Mojave River in Victorville (eBird, 2026). Based on the presence of suitable habitat within 500 feet of the Project Area and the presence of recent records, the southwestern willow flycatcher has low potential to breed but a high potential to forage along the Mojave River in the California portion of the Project Area.

Designated critical habitat for the southwestern willow flycatcher is present within the Mojave River between Bear Valley Crossing and Vista Road Bridge (USFWS, 2013). Although no large flycatcher nesting populations are in the Mojave Management Unit, southwestern willow flycatchers have been detected nesting in portions of the Mojave River (USFWS, 2013b). Furthermore, this area was designated as critical habitat to support conservation because it meets territory and habitat-related recovery goals for the southwestern willow flycatcher.

Least Bell's vireo (*Vireo bellii pusillus*). The least Bell's vireo is a federally and California endangered species. It is considered Sensitive by the California BLM and is a covered species under DRECP.

The species is a summer resident, which breeds in riparian scrub and woodland habitats along drainages or near water, including ponded surface water or where moist soil conditions may occur (Rosenberg et al., 1991). They generally occur within early successional riparian communities but are also known to nest in riparian woodlands dominated by willow and cottonwood (Kus et al., 2010). Suitable breeding habitat generally consists of dense, well-defined vegetative strata, or layers varying from two to ten feet above

ground (Goldwasser, 1981). Individuals may forage in woodlands or scrub habitat near suitable nesting habitat but will also forage in upland vegetation adjacent to riparian corridors late in season. The species breeds in Central Valley south to the south to Baja California; and arrive in southern California as early as mid-March, begin nesting in early April, and remain on the breeding-grounds through September before leaving for its wintering grounds in Baja California.

Least Bell's vireo was not observed during the May 8 and 27, 2026 protocol surveys, but suitable breeding habitat is located within 500 feet of the Project Area near the Victorville Switching Station along the Mojave River. The CNDDB contains seven records of least Bell's vireos within five miles of the Project Area (CDFW, 2021a), including records dated from 2005 through 2013. There are a few iNaturalist observations of least Bell's vireo within five miles of the Project Area. Several recent eBird records for the species are present along the Mojave River in Victorville. There is suitable breeding habitat located directly below the proposed ROW along the Mojave River. In addition, large expanses of riparian habitat are located within 500 feet of the Project Area along the Mojave River. Except for the Mojave River near the Victorville Switching Station, the Project Area does not support suitable habitat. However, this species is expected to move through the Project Area during seasonal migration. Based on the presence of suitable habitat within 500 feet of the Project Area and the presence of recent records, the least Bell's vireo has a moderate to high potential to breed and forage in the Project Area.

Tricolored blackbird (*Agelaius tricolor*). Tricolored blackbird is listed as Threatened by California. It is considered Sensitive by the California BLM, a USFWS BCC, and is a covered species under the DRECP. This species is a permanent resident across its range in California and occurs throughout the Central Valley and in coastal districts from Sonoma County south to Baja California. The tricolored blackbird breeds near fresh water, preferably in emergent wetlands with tall dense cattails (*Typha* spp.) or tules, but also in thickets of willows, blackberry, wild rose, and tall herbs (Shuford and Gardali, 2008). This species forages primarily in grassland and cropland habitats.

Tricolored blackbirds were not observed during surveys. The CNDDB records include an observation in the Mojave River within 0.5 miles of the Project Area. iNaturalist records include an observation south of I-15 with one record within five miles of the Project Area. Based on the presence of suitable foraging habitat (i.e., along the Mojave River) and records (CNDDB and iNaturalist), tricolored blackbirds have a low potential to breed but a high potential to occur within the Project Area in California. This species is not likely to be found in the Nevada portion of the Project Area.

Western burrowing owl (*Athene cunicularia hypugaea*). The western burrowing owl is a candidate for listing under CESA and is a CDFW Species of Special Concern. It is also considered Sensitive by the California and Nevada BLM and is a covered species under the DRECP.

The entire Project Area is located within the range of burrowing owls (Attachment A, Figure 11). The western burrowing owl inhabits arid lands throughout much of the western United States and southern interior of western Canada (Haug et al., 1993). Suitable habitats for the western burrowing owl generally includes open, treeless areas with available burrows, including agricultural fields (active and fallow), creosote scrub, desert saltbush, ephemeral washes, and ruderal areas. However, this species has been detected in relatively dense desert scrub.

Burrowing owl nest and roost in abandoned burrows, especially those created by ground squirrels, kit fox, desert tortoise, and other wildlife, and may also use surrogate burrows such as rubble piles, trash heaps, old tires, or drainage pipes. Though they may excavate their own burrows in soft soil, the western burrowing owl typically relies on existing mammal burrows in California. A study in Nevada determined

that earthen burrows were typically excavated by desert tortoise, American badger, and kit fox (Greger and Hall, 2014).

In southern California, the breeding season generally occurs from February to August, with peak breeding activity from April through July (Haug et al., 1993). Burrowing owls have a strong affinity for previously occupied nesting and wintering sites and will often return to previously used burrows, particularly if they had successful reproduction in previous years (Gervais et al., 2008). The female incubates the eggs for about 28–30 days, while the male provides food for the family. Young emerge after about 14 days and fledge after 44–53 days, remaining dependent on adults for a short period thereafter.

Burrowing owls are diurnal and crepuscular, hunting at all hours but concentrate their activity around sunrise and sunset, a behavior unusual among owls. Burrowing owls tend to be opportunistic feeders, and a large portion of their diet consists of beetles, grasshoppers, and other large arthropods. Other prey animals include herpetofauna, young cottontail rabbits, bats, and birds such as sparrows and horned larks. Its diet varies seasonally and geographically; females catch more insects, mainly during the day, while males catch mostly vertebrates, mostly at night.

One burrowing owl was observed during the June 2026 surveys in California. This observation was made north of Victorville and west of I-15 (Attachment A, Figure 7). Multiple burrows that could be used by this species were detected. A few burrows were observed to have sign (i.e., feathers and pellets) which suggest the birds may be overwintering or using these burrows as cover during migration. Burrowing owl pellets were observed at two different locations, occurring south of I-40 and east of SR-247. In both California and Nevada, suitable burrows occur that could host Burrowing owl. This species is expected to occur in the Project Area as a local breeder or seasonal migrant. CNDDB, iNaturalist, and ebird include records of burrowing owls within five miles of the Project Area. Based on predicted habitat modeling, number of potential burrows, and recent records, burrowing owls have a high potential to nest, forage, or winter in the Project Area.

No burrowing owls or their sign were detected in Nevada during the surveys. However, breeding, overwintering, and foraging habitat are present in the Project Area. Multiple recent eBird records are present along the Project Area. Burrowing owls have a high potential to nest, overwinter, or forage in the Project Area in Nevada.

Swainson's hawk (*Buteo swainsoni*). Swainson's hawk is listed as Threatened under CESA. It is considered Sensitive by the California and Nevada BLM, is a USFWS Bird of Conservation Concern (BCC), and is a covered species under DRECP. It preys on small mammals, birds, large insects, reptiles, and amphibians. Swainson's hawks usually hunt from perches such as fence posts and low trees, or from vantage points on the ground. This species is commonly found over open plains and prairies in the Great Plains and relatively arid areas of western North America. It builds rather flimsy nests in shrubs and trees along wetlands and drainages and in windbreaks in fields and around farms. It nests in the San Joaquin, Owens, and western Antelope Valleys of California and its primary wintering grounds is in Argentina. Swainson’s hawks migrate through the southwest every spring and fall. Suitable migration-season foraging habitat is present throughout the Study Area.

Migratory Swainson's hawks were observed in flight over the Project Area during surveys in Nevada and California. The Project Area is located outside of the breeding range of the species and Swainson’s hawks are not expected to nest near the Project. Suitable foraging habitat for migrating Swainson's hawks is present. Although there are CNDDB and iNaturalist records of Swainson's hawks within five miles of the Project Area (CDFW, 2021a) this species is not expected to nest in the region. Swainson's hawks are

unlikely to nest in either the California or Nevada segments of the Project but have a have a high potential to forage along both segments of the Project Area.

Gilded flicker (*Colaptes chrysoides*). Gilded flicker is listed as Endangered under the CESA and is considered Sensitive by California and Nevada BLM. It is also USFWS BCC. The gilded flicker is a large, distinctive woodpecker and a permanent resident of the Sonoran Desert, reaching the northern and western limits of its range along the lower Colorado River in extreme southeastern California. This species is found within Sonoran, Yuma, and eastern Colorado Desert regions of southeastern California and Arizona south to southern Baja California and through Sonora to northern Sinaloa, Mexico (Audubon, 2025a).

This species is strongly associated with giant cactus forests, such as those dominated by the saguaro (*Carnegiea gigantea*s) and mature cottonwood-willow riparian forests along the lower Colorado River (CDFG, 1987; Cornell Lab of Ornithology, 2025). Gilded flickers may also occur in desert riparian, desert wash, and Joshua tree habitats and require soft wood of snag or dead branches for nesting. These include cottonwoods, willow, Joshua tree, saguaro cactus, and man-made structures (i.e., wooden power pole) for nesting. The gilded flicker is characterized as a ground forager, feeding extensively on ants and their larvae, as well as beetles and other insects, which it collects by hopping on the ground or probing anthills (Audubon, 2025a; NatureServe, 2025). In winter, when insect prey is scarce, its diet is supplemented with fruits and seeds, particularly from large columnar cacti (Cornell Lab of Ornithology, 2025; Sonoran Joint Venture, 2023).

The breeding season for gilded flickers begins in mid-March, with pairs typically nesting from mid-April to early May (Earth Life, 2025). Incubation, performed by both parents, lasts about 11 days, and the young fledge about four weeks later (Audubon, 2025a; NatureServe, 2025). The species is year-long and diurnal, with pairs generally being monogamous and forming lifelong bonds (Earth Life, 2025). Its nesting habitat is critically dependent on large, old trees or columnar cacti, where it excavates unlined nesting cavities, typically 6–20 feet above the ground (Audubon, 2025a). The flicker is a primary cavity excavator, creating nest holes that are then utilized by many secondary cavity users, such as elf owls and small mammals, making it a keystone species in the desert ecosystem (Audubon, 2025a; Earth Life, 2025). Both sexes participate in cavity excavation, a process that can take a year before the site is inhabited, especially when using saguaros (Earth Life, 2025).

The Project Area is situated adjacent to the known geographic range of the gilded flicker in (Attachment A, Figure 12). While the Project footprint intersects sections of potential habitat for the species, it does not encompass the entire area. While flickers may inhabit various zones across the Project Area, its distribution is expected to be non-uniform, that is higher population densities are anticipated within the most eastern reach of the Project Area.

Two gilded flickers were identified in 2025 near the Clark Mountains at tower Line 2, Tower 37-2 within the California portion of the Project Area (Attachment A, Figure 7). No other gilded flickers have been observed to date. Despite searches for other diagnostic signs such as active nesting cavities, "start" holes, and foraging excavations, field teams identified no nesting cavities or other signs of habitat use. As the only detection was near the California-Nevada border, just north of the mapped range in CDFW data (Attachment A, Figure 12), it is assumed that this species may nest or forage in the broader region. Based on a review of iNaturalist and CNDDB occurrences, this species has the highest potential to occur near the Clark and Mesquite Mountains.

Based on the presence of individuals observed, suitable nesting and foraging habitat, and presence of nearby CNDDB and eBird records, gilded flickers should be considered present near the Clark Mountains in the eastern section of the Project Area in California.

Gilded flicker was not observed during surveys in Nevada, but suitable nesting and foraging habitat is present. In Nevada, the species has been documented within five miles of the Project Area (eBird, 2025). Based on the presence of suitable habitat and recent records gilded flicker has a high potential to nest and forage within the Nevada portion of the Project Area.

Golden eagle (*Aquila chrysaetos*). Golden eagle is federally protected under the Bald and Golden Eagle Protection Act (BGEPA) and is a California Fully Protected Species. It is also considered Sensitive by the California and Nevada BLM and is a covered species under DRECP.

Golden eagles are year-round residents throughout most of their range in the western U.S. In the southwest, they are more common during winter when eagles that nest in Canada migrate south into the region. They breed from late January through August, mainly during late winter and early spring in the California deserts. In the desert, they generally nest in steep, rugged terrain, often on sites with over-hanging ledges, cliffs, or large trees that are used as cover. Golden eagles are wide-ranging predators, especially outside of the nesting season, when they have no need to return daily to tend eggs or young at their nests. Foraging habitat consists of open terrain including grasslands, deserts, savanna, and early successional forest and shrubland habitats. They prey primarily on rabbits and rodents, but will take other mammals, birds, reptiles, and some carrion.

Golden eagle home ranges in the Mojave Desert range from 1.7 to 1,369 square miles, and averaged 119 square miles (Braham et al., 2015). In any given year, golden eagles may initiate nesting behavior at one nest, without any activity at the other nests. Eagles may complete breeding by laying eggs and raising chicks or may abandon the nest without successfully raising young. In any given year, all or most nests in a territory may be inactive, but eagles may return in future years to nest at previously inactive sites.

An active golden eagle nest has been detected on an existing transmission line structure in the Ord Mountains adjacent to the existing ROW. The active nest was documented within 1600 meters of a historic nest. Additionally, two other nests, which were inactive, were observed within the golden eagle Survey Area. In addition, golden eagles have been observed foraging within the Project Area east of the City of Yermo on the California segment (Attachment A, Figure 7). No suitable natural nesting habitat is present within the Project Area. However, golden eagles have been documented to use artificial nesting sites such as electrical transmission towers for nesting. Suitable foraging habitat is present throughout California. Based on observations, suitable habitat, and records, golden eagle is present and has a high potential to forage and nest in the Project Area in California.

Two individual golden eagles were observed flying in and perching on a tower simultaneously in the Nevada segment of the Project Area in 2025 (Attachment A, Figure 7). Although no golden eagle nests were observed during the 2026 golden eagle protocol surveys in Nevada, or incidentally during other surveys; this species is known to nest the Project Vicinity in Nevada. Based on observations during surveys, suitable habitat, and records, golden eagle is present and has a high potential to forage and nest in the Project Area in Nevada.

Bendire's thrasher (*Toxostoma bendirei*). Bendire's thrasher is designated as a Sensitive Species by the BLM in California and Nevada. The species was accepted for candidacy under CESA by the California Fish and Game Commission at its April 15–16, 2026 meeting and is therefore considered a candidate species pursuant to Section 2068 of the California Fish and Game Code (California Fish and Game Commission,

2026). As a candidate species, it receives the same legal protection as species listed as threatened or endangered under CESA.

Bendire's thrasher is a medium-sized, long-billed songbird endemic to the arid lands of the southwestern United States and northwest Mexico, with a small portion of its global population residing in the Mojave and Sonoran deserts of southeastern California (Tweit, 2020; Center for Biological Diversity, 2025a). They can occur in scattered desert habitats across the Mojave and Sonoran deserts. For example, they often occupy open desert scrub and woodland ecotones featuring cholla (*Cylindropuntia* spp.), yucca (*Yucca* spp.), or Spanish bayonet (*Hesperoyucca whipplei*), which provide essential cover and nesting sites (England & Laudenslayer, 1993). However, Bendire's thrashers are more likely to occur in flat areas with compact, clay, or gravelly soils rather than the loose, sandy soils preferred by other desert thrashers (NatureServe, 2024). These preferred habitats must provide widely spaced shrubs for foraging, as the species spends significant time running and digging on the ground.

Bendire's thrasher is well-adapted to the arid conditions of the American Southwest, (Probst et al., 2022). Bendire's thrashers are also known to be secretive, often hiding in dense foliage or running for cover rather than flying when disturbed (Tweit, 2020). The species is predominantly active during the breeding season, which typically spans from February through July, depending on elevation and latitude (Tweit, 2020). However, some populations in the northern part of their range (such as the Mojave Desert) may be migratory or disperse locally during the non-breeding season to avoid harsh winter conditions. It may be active throughout the day, but foraging activity peaks during the cooler morning hours. Mating activity typically begins in late winter, with nest construction often starting in February or March (England & Laudenslayer, 1993). Eggs are generally laid between March and May.

The Project Area is in the distribution of Bendire's thrasher and overlaps suitable habitat in a few locations (Attachment A, Figure 13). Based on habitat conditions Bendire's thrasher occupancy is expected to be patchy across the landscape, with the most significant population concentrations predicted to occur from the Hollow Hills Wilderness north of the Soda Mountains to Stateline, or within and near the Clark Mountain range, and the western fringes of the Project area near the Granite Mountains and Sidewinder Valley within California portion of the Project (Attachment A, Figure 13).

There are also CNDDB, iNaturalist, and eBird occurrences near Kingston Wash within the Clark Mountain range in the eastern portion of the project in California. There are also occurrences in the western portion of the Project Area that appear to be isolated to the Granite Mountains (Attachment A, Figure 13). Nonetheless, this species may occur anywhere within its expected range which generally corresponds to two discontinuous locations totaling 59 miles, spanning in the east from project mile 72 to the state line (46 miles) and in the west spanning from the Victorville Switching Station to project mile 149 (13 miles). The Project ROW also overlaps the Northern Lucerne Wildlife Linkage, Ivanpah, and Shadow Valley ACECs within the range of Bendire's Thrasher portion of the Project.

Bendire's thrasher was not observed during any of the surveys conducted. However, the project area is within the known breeding range of the species and supports suitable nesting and foraging habitat. Therefore, there is a moderate potential for Bendire's thrasher to forage and nest within the California and Nevada segments of the Project Area.

LeConte's thrasher (*Toxostoma lecontei*). LeConte's thrasher is designated as a Sensitive Species by the BLM in California and Nevada. The species was accepted for candidacy under CESA by the California Fish and Game Commission at its April 15–16, 2026 meeting and is therefore considered a candidate species pursuant to Section 2068 of the California Fish and Game Code (California Fish and Game Commission,

2026). As a candidate species, it receives the same legal protection as species listed as threatened or endangered under CESA.

LeConte's thrasher is a pale, ground-dwelling songbird that is an obligate resident of the sparsely vegetated, arid scrub communities of the Mojave, Colorado, and San Joaquin Valley deserts in California (Shuford & Gardali, 2008). It can occur in some of the hottest and driest desert habitats in North America, typically occupying open desert flats dominated by creosote bush *(Larrea tridentata)* and white bursage (*Ambrosia dumosa*) at lower elevations, to saltbush (*Atriplex* spp.*)* scrub and cholla cactus (*Cylindropuntia* spp.) thickets in sandy washes (Sheppard, 2020). The species is recognized as a regional specialist that relies on specific habitat structures (large bush and thicket formations) for nesting, foraging, and predator avoidance (NatureServe, 2025). It is known to run across open ground between cover rather than flying (Sheppard, 2020).

LeConte's thrasher is well adapted to the variable and sometimes harsh desert environments. The preferred habitats also typically provide sufficient cover, as LeConte's thrashers will nest and roost deep within dense, thorny shrubs or cacti to escape predators and heat. LeConte's thrasher is more likely to occur in habitats with accumulated leaf litter and soft, friable soils to allow for their distinct digging and probing foraging behavior (Fitton, 2008). It feeds primarily on a variety of terrestrial arthropods, including beetles, scorpions, spiders, and grasshoppers. Although LeConte's thrasher does require moisture, it is physiologically adapted to obtain nearly all necessary water from their insect diet and can survive indefinitely without freestanding water (Servin et al., 2001).

LeConte's thrasher breeding season extends from late January into early June with a peak from mid-March to mid-April. Mating activity typically occurs between January and February, driven by winter rain. Eggs are generally laid during early spring (February to May) (Sheppard, 2020). Nests are commonly located in dense, spiny shrubs or densely branched cacti. It can be active year-round, as it is a permanent resident that does not migrate. This species may be active intermittently throughout the day, but most foraging activity occurs in the early morning and late evening.

LeConte's thrashers were observed, including a pair, foraging within the Project Area during surveys within the California segment (Attachment A, Figure 7). The Project Area is within a portion of LeConte's thrasher range (Attachment A, Figure 14). In addition, there are CNDDB and iNaturalist records this species within five miles of the Project Area. Therefore, based on the presence of individuals observed during surveys, suitable foraging and nesting habitat, and recent records, LeConte's thrashers are known to forage and have a high potential to nest within the Project Area in California.

LeConte's thrashers were observed foraging and nesting during surveys in the Nevada segment. A nest with eggs was observed within the Project Area. Therefore, based on the presence of foraging and nesting LeConte's thrasher observations, this species is expected to occur within the Nevada segment of the Project Area.

Desert bighorn sheep (*Ovis canadensis nelson*). Desert bighorn sheep is designated as Fully Protected by the CDFW pursuant to California Fish and Game Code Section 4700. Desert bighorn sheep in eastern San Bernardino County and Nevada are considered Sensitive by the California and Nevada BLM and are a covered species under DRECP. In Nevada, desert bighorn sheep are considered a Game Mammal under Nevada Administrative Code 503.020.

Management actions for this species are guided by a recently updated Conservation and Management Plan for Bighorn Sheep in California (CDFW, 2025b). This plan focuses explicitly on conservation goals for the non-endangered desert bighorn sheep populations addressing threats such as disease transmission from domestic livestock, habitat fragmentation, and reduced connectivity between herds.

Desert bighorn sheep is a large, strong ungulate highly specialized for life in the arid, mountainous terrain of the southwestern deserts. This species primarily feeds on a diverse array of browse and forbs when grasses are limited. Its diet is diverse, varying over space and time, but is often dominated by browsing from winter into spring (McKinney & Smith, 2007). Desert bighorn sheep adapts its foraging behavior to seasonal changes in vegetation and moisture availability.

Desert bighorn sheep occupy a wide range of desert habitats, from elevations near valley floors to high desert mountain peaks. They are obligatory inhabitants of steep, rugged, rocky terrain, which serves as their essential escape and lambing habitat (Epps et al., 2005). This terrain is typically adjacent to lower-elevation slopes and alluvial fans used for foraging and periodic movement. Habitats often include steep, sparsely vegetated slopes and alluvial fans used for foraging (Wehausen, 1980). They are typically found within a few miles of a reliable water source (Leslie & Douglas, 1979).

Desert bighorn sheep are predominantly diurnal (active during the day), with most feeding activity occurring during the cooler hours. During the hottest summer months, they often seek thermal refuge in caves or under rock overhangs (Monson & Sumner, 1980). Mating activity typically occurs during the late summer and fall (Gionfriddo & Krausman, 1986; Monson & Sumner, 1980).

Most of the Project Area is within the documented range of desert bighorn sheep and portions of the Project Area overlap with essential movement corridors. Population density for the species is anticipated to fluctuate across the site's linear extent; specifically, desert bighorn sheep presence is expected to be concentrated in the eastern regions, near mountain “islands” with steep slopes that serve as habitat for desert bighorn sheep.

In Nevada and California, the ROW is near areas used by desert bighorn sheep (CDFW 2025). These include:

- McCulloughs (McCullough (Central) and Lucy Grey Range (NDOW, 2025),
- Clark Mountain/Spring Range (between California-Nevada Stateline and Kingston Road),
- Kingston Range / Mesquite Mountain (west of Kingston Road to west of SR127/Death Valley Road),
- North Soda Mountains (west of SR-127 three sections on the northern tip),
- Avawatz Mountains (between sections of North Soda Mountains), and
- Newberry / Ord Mountains (south of I-40 and east of SR-247) and west of SR-247 and east of I-15.

Habitat for this species varies along the ROW depending on specific mountain ranges and intermediate areas (Attachment A, Figure 15). In California, areas not mapped as predicted habitat are interspersed with areas of high-quality habitat in the general area of Kingston Road. Areas lacking predicted habitat are located between I-15 to I-40 and west of I-15 to Victorville.

During the 2021 surveys a horn fragment was observed at Line 1 Tower 93-5 near the north Soda Mountains where desert bighorn sheep have been documented to occur. In addition, a horn fragment was also observed in 2025 in the Clark Mountains northeast of Ivanpah near Line 2 Tower 34-6 within the California portion of the Project Area. Desert bighorn sheep are known to use portions of the Project Area particularly near the mountains where known herds are monitored. Based on the remains observed during surveys, suitable habitat, and known herd locations, desert bighorn sheep have a high potential to occur within the Project Area where suitable habitat exists, at any time of year, and are more likely to occur on the eastward portion of the Project.

In the Nevada segment, desert bighorn sheep were observed within the Survey Area, within the McCullough Mountain Range. Seven sheep, including four adults and three juveniles, were observed during surveys near an access road in 2026. Six desert bighorn sheep were observed north of Line 1 Tower 10-3 in 2021, and a group of 16 desert bighorn sheep were observed in 2025 during the surveys north of Line 1 Tower 10-4 (Attachment A, Figure 7). Suitable habitat is present within the McCullough Mountain Range of the Project Area. Several iNaturalist records of this species are documented within five miles of the Project Area. Based on the presence of suitable habitat, observations during the surveys, and recent records, desert bighorn sheep should be expected to occur along the Nevada segment of the Project Area, specifically within the McCullough mountain range.

Ringtail (*Bassariscus astutus*). The ringtail is designated as Fully Protected by the CDFW, pursuant to California Fish and Game Code Section 4700. It is also considered Sensitive by the California BLM. This species is not protected in Nevada.

Ringtails can be found from southern Mexico north to Kansas, southern Wyoming, and Oregon. In California, this species is a widely distributed permanent resident that occurs in various riparian habitats and in brush stands of most forest and shrub habitats from sea level up to 9,500 feet but is most common below 4,600 feet (NatureServe, 2025). Ringtails occur in a variety of habitats, including chaparral, desert, coastal sage scrub, riparian scrub, oak woodlands, and riparian woodlands. This species prefers habitats in proximity to permanent water. Ringtails are seldomly found more than 0.6 miles from permanent water. Dening sites typically occur in rock recesses, hollow trees, logs, snags, abandoned burrows, or woodrat nests and breeding typically occurs between February and May. Ringtails are opportunistic feeders, but primarily prey on rodents, rabbits, birds, bird eggs, reptiles, and invertebrates (Zeiner et al., 1990b).

Most of the Project Area in California is considered low quality habitat with areas of moderate quality and a discrete area of high-quality habitat near the Victorville Switching Station near the Mojave River. Moderate quality habitat is interspersed near the Clark Mountains and westward towards Hollow Hills Wilderness (east of SR-127).

Ringtail was not observed during surveys of the ROW. However, these species are difficult to detect and likely occur in areas near perennial water. Although ringtail was not observed in California or Nevada during the surveys, the species has low potential to occur in most of the Project Areas, but a moderate potential at discrete locations of the Project Area particularly near the Mojave River.

Mountain Lion (*Puma concolor*). Mountain lions are considered a California Threatened species under the CESA in portions of its range. In February 2026, the California Fish and Game Commission listed mountain lion populations in Southern California and the Central Coast as threatened under the CESA. However, the listing for this species occurs outside most of the Project Area.

During the evening hours, mountain lions will utilize many habitats within their range to hunt including riparian, scrub, chaparral, grassland, and woodland habitats (Dickson et al., 2005). While hunting, mountain lions prefer to stalk and pursue their prey along canyon bottoms and gentle slopes (Dickson and Beier, 2006). Mountain lions will feed on steeper slopes in habitats with dense understory vegetation for cover (Benson et al. 2016). Although they will travel through open or human-disturbed habitat, they prefer expansive, intact, heterogeneous habitat (Dickson and Beier, 2002; Dickson et al., 2005).

The mountain lion is a large solitary felid that is considered both nocturnal and crepuscular but has been observed during daylight hours (Dickson and Beier, 2002; Dickson et al., 2005). In California, mountain lions can be found in a variety of habitat types between sea level and 10,000 feet in elevation. However,

mountain lion habitat, population numbers, and genetic diversity have been declining rapidly, especially within Southern California populations (Yap et al., 2019).

Mountain lions exist at naturally low population densities, but they are very territorial and require large swaths of intact wilderness. Home ranges vary and one study found they averaged 372 km2 for adult males and 134 km2 for adult females, which was similar to reported ranges by other researchers (Riley et al., 2021). In southern California, mountain lions have been found to utilize different habitats within a 24-hour period (Dickson et al., 2005). Mountain lions are mostly active during dusk and dawn, but their peak activity will shift to nocturnal patterns when closer to human developments. During daylight hours, mountain lions were frequently found in riparian habitats, suggesting that they prefer to rest in areas with dense understory vegetation for cover (Dickson and Beier, 2002; Dickson et al., 2005). Mountain lion movement patterns tend to follow the distribution and abundance of deer, a common food source of southern California/Central Coast ESU populations (Grigione et al., 2002). Mountain lions are opportunistic hunters and will also feed on other ungulates (such as desert bighorn sheep, pronghorns, and domestic livestock), bobcats, coyotes, fox, skunks, raccoons, squirrels, rabbits, rodents, and insects (Currier, 1983).

Mountain lions are typically active year-round and can reproduce at any time of the year, but the timing of reproduction may be influenced by prey abundance and climate. In North America, kitten births are most common between April and September (Currier, 1983; Beier, 1993). Mountain lions will form dens in rocky outcrops, caves, and other natural cavities when rearing young (Yap et al., 2019).

No mountain lions were observed during the surveys. However, suitable habitat is present throughout portions of the Project Area. iNaturalist records include observations of mountain lions tracks in the Mojave National Preserve near the border with Nevada and near Hesperia. Based on the presence of suitable habitat, large range used by individual mountain lions, and known occurrences mountain lions have a moderate potential to be present in specific portions of the Project Area.

Mohave ground squirrel (*Xerospermophilus mohavensis*). The Mohave ground squirrel is listed as Threatened under CESA and is recognized as Sensitive by the California BLM. It is also a focus species under DRECP. Mohave ground squirrel was first listed as Rare under CESA, being one of the first species listed by the State of California under the original enactment of CESA in 1971 (CDFW, 2023b). It was later reclassified as “Threatened in 1984 (§670.5(b)(6)(A), T14, CCR). The Mohave ground squirrel is not currently listed under the federal Endangered Species Act (ESA); however, it has been the subject of multiple petitions to the USFWS for listing. Most recently, a 2023 petition to list the species as Threatened was found to be "substantial" enough to warrant a status review (Defenders of Wildlife, 2023; Federal Register, 2025).

The Mohave ground squirrel is rare throughout its range and typically occurs in desert scrub habitats, usually on flat to gently sloping terrain with alluvial soils (Best, 1995). It can also be found in alkali desert scrub, western Joshua tree, and annual grassland habitats (CDFW, 2023b). Optimal habitats typically have sandy to gravelly soils, allowing them to dig burrows, which are frequently excavated at the base of shrubs. Mohave ground squirrels can be found between 505 and 11,525 m (1,800 and 5,000 ft) elevations. It typically forages on perennial shrub foliage (from Chenopodiaceae taxa such as winterfat (*Krascheninnikovia lanata*), spiny hopsage (*Grayia spinosa*), and saltbushes (*Atriplex* spp.), and annual leaves, seeds, flowers, and pollen from annual forbs and herbaceous plants (Leitner and Leitner, 2017).

Mohave ground squirrel is typically above ground and active during the spring and early summer (March through June). Emergence from hibernation varies by location and generally occurs mid-March (Leitner and Leitner, 2017), but in the southern portion of their range, it may emerge as early as mid-January

(Recht, 1977). Aestivation generally begins in July or August (CDFW, 2023b). Mating activity occurs in early spring, with young being born between March and May, with a peak of births in April (Recht, 1977).

The DRECP identifies four core areas for this species including the Coso/Olancha, Little Dixie Wash, Coolgardie Mesa/Superior Valley, and Edwards Air Force Base. These areas support relatively abundant populations and are prioritized for conservation (CDFW, 2023b). All these areas are outside the Project Area.

Reconnaissance level surveys and a Mohave ground squirrel habitat assessment were conducted between August 19 and 21, 2025 by Kathryn Simon and Adam Walters. Six factors were considered to evaluate habitat suitability in the Project Area including vegetation, soils, distance to recent record, disturbance, Mohave ground squirrel species distribution model, and distance to the Mohave ground squirrel range boundary (Attachment A, Figure 16).

No Mohave ground squirrels, or their burrows were documented within the Survey Area during the surveys. The Project area is located outside of all identified Mohave ground squirrels core areas and potential movement corridors. The project is largely located outside of the current range of the species, with the Project Area being located along the eastern extent of the Mohave ground squirrel's range (Attachment A, Figure 16). The Project Area is located inside California Wildlife Habitat Relationship predicted habitat which extends from Death Valley Road (State Route 127) southwest to five miles south of Interstate 40 (I-40) and from the Mojave River to the Victorville Switching Station. The modeled habitat quality within these areas varies from low quality habitat throughout the northeast portion of the predicted habitat to medium and high-quality habitat areas south of I-40 towards the Victorville Switching Station.

No trapping data is available along the Project Area from the California Natural Diversity Database (CNDDB), trapping data available is restricted to the Victorville area to the north and west of the Project Area. No additional CNDDB or iNaturalist records are present along the Project area east of Barstow.

Based on the presence of suitable habitat, a Mohave ground squirrel habitat assessment conducted in 2025, historic records, there is a low to moderate potential for Mohave ground squirrel to occur within portions of the Project Area. The most likely area to support the species is includes approximately 15 miles of the Project Area generally located between the Mojave River and Stoddard Mountain Road near Tower Line 1 146-2. However, trapping conducted in 2026 did not detect this species in this or other areas. Outside of these areas, west of SR-127, there is low potential for the species to occur because of low quality habitat, outside predicted range, and a lack of historical detection. The Project Area east of SR-127 is outside of the range, predicted habitat and lack historical detections. This species is unlikely to occur east of SR-127.

4.8 Other Protected Species

San Emigdio blue butterfly (*Plebulina emigdionis*). San Emigdio blue butterfly is considered a CDFW Special Animal. The San Emigdio blue butterfly is found in desert canyons and along riverbeds in Inyo, Kern, Los Angeles, and San Bernardino counties. The species has a flight period between April and September. The known host plants for this species are fourwing saltbush and possibly American bird's foot trefoil (*Lotus purshianus*).

San Emigdio blue butterflies were not observed during the surveys. The host plant fourwing saltbush was observed within the Project Area which provides suitable foraging habitat and egg deposition locations. There are CNDDB and iNaturalist records of this species within five miles of the Project Area near the city

of Victorville. Based on the presence of host plants and recent nearby records, there is a high potential for this species to occur within discrete locations along the Mojave River in the California segment of the Project Area.

Victorville shoulderband (*Helminthoglypta mohaveana*). Victorville shoulderband snails are considered a State Rank 1 species but do not have any federal status. This species appears to be restricted to discrete areas along the Mojave River near Victorville, California. Members of the genus Helminthoglypta are air-breathing, terrestrial snails. Shells are medium to large, with no apertural teeth, but usually with a reflected apertural lip. These snails possess a single dart apparatus with one stylophore (dart sac) and two mucus glands which are utilized to create love darts. Love darts, which are shaped in many distinctive ways vary considerably between species, are hard, sharp, calcareous, or chitinous darts that are used as during courtship before actual mating takes place (Pilsbry, 1946).

Victorville shoulderband snails were observed during the surveys on the rocky slopes above the Mojave River. In addition, there are CNDDB and iNaturalist includes records along the banks of the Mojave River south of the Project Area. Based on records from iNaturalist and CNDDB and the observation of this species during surveys, there is a high potential for the species to occur within discrete areas within the California segment of the Project Area.

Great Basin collard lizard (*Crotaphytus bicinctores*). The Great Basin collard lizard is recognized as Sensitive by the Nevada BLM and is on the NDNH At-Risk Plant and Animal Tracking List. The species is found in the Great Basin Desert in the far northeast and east of the Sierras, the Mojave and Sonoran Deserts in southern California and ranges north through most of Nevada to southeast Oregon, southern Idaho, through western Utah and northern and western Arizona (Nafis, 2021). The great basin collard lizard occurs mainly in arid rocky hilly deserts with sparse vegetation, on alluvial fans, lava flows, hillsides, rocky plains, and canyons; and are found from sea level to about 7,500 ft (Nafis, 2021).

Great basin collard lizard was observed within the Nevada portion of the Project Area. Also, suitable habitat is present throughout the Project Area within the Nevada segment. Additionally, it was observed at Line 2 tower 29-1 within the California segment approximately 1.4 miles west of the California-Nevada state line. Based on the observations of this species during the surveys, the presence of suitable habitat, and recorded occurrences, great basin collard lizards should be considered present in the Nevada segment of the Project Area. Although the species was observed throughout the California segment, the species is not considered special-status in California.

Desert Iguana (*Dipsosaurus dorsalis*). The desert Iguana is recognized as Sensitive by the Nevada BLM and a on the NDNH At-Risk Plant and Animal Tracking List. Desert iguanas occur in southern California mountains and the eastern Sierra Nevada mountains in the Owens Valley, to Arizona, Nevada, and Baja California. The species inhabits creosote bush dominated vegetation communities from below sea level to 3,300 ft. elevation. It prefers hummocks of loose sand and patches of firm ground with scattered rocks as well as desert washes, dunes, streambeds, and floodplains (NDOW, 2024).

Suitable habitat is present throughout the Project Area within the Nevada segment. Records include an occurrence approximately 3.3 miles to the west of Line 1 Tower 19-3 and iNaturalist observations within five miles of the Project Area. Based on the presence of suitable habitat and known occurrences, desert iguanas have a high potential to occur within the Nevada segment of the Project Area. This species is common in California and was observed at several locations during the surveys. This species is not considered sensitive in California.

Desert horned lizard (*Phrynosoma platyrhinos calidiarum*). The desert horned lizard is considered Sensitive by the Nevada BLM. It is found in arid lands including sandy flats, at the edges of sand dunes, alluvial fans, and dry washes in desert communities dominated by creosote, salt bush, cacti, other small shrubs (Nafis, 2021). It requires habitat that supports native ants as they comprise 90 percent of their diet. They are generally active in the spring through fall. The desert horned lizard is found mostly in the Sonoran and Mojave Deserts, but can also be found in California, Nevada, western Arizona Utah, Idaho and Mexico, northwestern Sonora, and northeastern Baja California (Nafis, 2021).

Desert horned lizards were not observed during the surveys of the Nevada segment of Project Area. However, they were found during surveys of the California segment. Suitable habitat is present throughout the entire Project alignment. There are iNaturalist records within five miles of the Project Area. Although it has a high potential to occur in the California segment of the Project Aea, the species is not considered sensitive in California. Based on the presence of suitable habitat and recent records there is a high potential for desert horned lizards to occur within Nevada segments of the Project Area.

Common chuckwalla (*Sauromalus ater*). The common chuckwalla is recognized as a Sensitive by the Nevada BLM. The common chuckwalla ranges from southern California south into Baja California, and east of California into southern Nevada and Utah, through eastern Arizona and south into Sonora, Mexico (Nafis, 2021). The species occurs in rocky flats and hillsides, lava flows, and large outcrops in the Mojave and Colorado Deserts in vegetation communities dominated by creosote bush. Although primarily associated with natural rock crevices, chuckwallas have also been observed inhabiting atypical places such as burrows in dirt, piles of railroad ties, and artificial rip rap will also be used for cover.

The common chuckwalla was observed during surveys in the California segment of the Project Area; however, the species is not considered sensitive in California. A single common chuckwalla was observed within the Project Area at Line 1, Tower 27-3 in the Nevada portion of the ROW and are expected to occur wherever suitable is present. There are iNaturalist observations of this species within five miles of the Project Area. Based on observation from the surveys, presence of suitable habitat, and recent records, the common chuckwalla has a high potential to occur within the Nevada segment of the Project Area.

Mojave fringe-toed lizard (*Uma scoparia*) The Mojave fringe-toed lizard is considered Sensitive by the California BLM, and it is a CDFW Species of Special Concern. It is also a DRECP focused species and Nevada protected reptile (NAC 503.080). It is known almost exclusively from California, primarily in San Bernardino and eastern Riverside Counties, but are also found to the north in southeastern Inyo County and historically to the west in eastern Los Angeles County (Jennings and Hayes, 1994).

The most important factor in this species' habitat is the presence of fine sands. The Mojave fringe-toed is found in arid, sandy, sparsely vegetated habitats and is associated with creosote scrub throughout much of its range (Jennings and Hayes, 1994). It is restricted to habitats containing fine, loose, aeolian sand, (Turner et al. 1984; Jennings and Hayes 1994), where it burrows in the sand to avoid predators and to thermoregulate (Stebbins, 1944), though it will also seek shelter in rodent burrows. Sand dunes provide their primary habitat, although they can also be found in the margins of dry lakebeds and washes and isolated pockets against hillsides.

The Mojave fringe-toed lizard is primarily insectivorous but also eats plants including leaves, seeds, and buds (Stebbins, 1944). This species normally hibernates from November to February and emerges from hibernacula from March to April. The breeding season is April to July (Jennings and Hayes, 1994). From April to May, while temperatures are relatively cool, this species is active during midday; from May to September, they are active in mornings and late afternoon but seek cover during the hottest parts of the day.

The Mojave fringe-toed lizard is widespread across the Mojave and northern Colorado deserts, but its distribution is highly fragmented because it is restricted to habitats containing loose sand, which is patchily distributed (Murphy et al., 2007). Many local populations occur on small patches of sand and are quite small.

Suitable habitat for Mohave fringe-toed lizards was observed in limited areas of the Project Area during surveys. In 2025, two individuals were observed outside the Project Area (Attachment A, Figure 7). Based on presence of individuals within 400 feet of the Survey Area survey observations, presence of limited suitable habitat, Mohave fringe-toed lizard has a high potential to occur within the California segment of the Project Area in discrete locations that support, or are close to, large areas of fine sands.

Costa's hummingbird (*Calypte costae*). Costa's hummingbird is a USFWS BCC. Costa's hummingbirds occur within Mojave Desert scrub, coastal California chaparral, sage scrub, deciduous forest, desert scrub and streams with cottonwoods, brittlebush, fourwing saltbush, and other species from near sea level to 4,000 ft. elevation. Breeds in southwest North America from central California, southern Nevada, and southwestern Utah. Winters Baja California and coastal Mexico.

A single adult female Costa's hummingbird was observed within the Project Area southwest of State Route 247 near Barstow. No evidence of nesting was observed; however suitable nesting and foraging habitat is present throughout the Project Area. There are iNaturalist and eBird records within five miles Project Area in California and Nevada. Based on the presence of suitable nesting and foraging habitat, Costa's hummingbirds have a high potential to occur along both the California and Nevada segments of the Project Area.

Peregrine falcon (*Falco peregrinus*). The peregrine falcon is considered Sensitive by the Nevada BLM, and it is classified as a Sensitive Bird in Nevada under NAC 503.050(3). This species was removed from the California Fully Protected Species list in July 2024 (CDFW § Section 2081.5). In North America, the species occurs from the Arctic tundra through Canada, United State, and Mexico with birds migrating into south America. Peregrine falcons forage near wetlands, lakes, rivers, or other bodies of water where they primarily feed on birds. Nesting generally occurs on cliffs, banks, dunes, mounds; also, human-made structures including electrical transmission towers, quarries, silos, skyscrapers, churches, and bridges. In places without cliffs, Peregrines may use abandoned common raven or red-tailed Hawk nests. Nest are located on a ledge that is typically around a third of the way down the cliff face about 25–1,300 feet high (Cornell Lab of Ornithology, 2021).

Peregrine falcons were observed during surveys in 2025 and are known to occur in the region. An individual was perched on a Mojave yucca near tower L2 149-2 between I-15 and SR-247. Another bird was perched on tower L1 81-2, which is located north of the North Soda Mountains (Attachment A, Figure 7). Suitable nesting and foraging habitat are present within the mountains of the McCullough and other mountain ranges in the Project Area and on manmade structures located along the Nevada and California segments. There are multiple recent eBird records for the species along the California and Nevada segments (eBird, 2026). Based on observations during surveys, presence of suitable habitat, and recent records peregrine falcon has a high potential to forage and low potential to nest within the Project Area within the Nevada and California segments.

Loggerhead shrike (*Lanius ludovicianus*). The loggerhead shrike is recognized as Sensitive by the Nevada BLM, is classified as a Sensitive Bird in Nevada, and is a CDFW Species of Special Concern. It is widespread in the United States and throughout California and Nevada. It prefers open habitats with scattered shrubs, trees, posts, fences, utility lines, or other perches. It most often occurs in open-canopied forest and woodland habitats. It nests in well-concealed microsites in densely foliaged trees or shrubs (Bent, 1950).

It feeds on large insects, but will also take small birds, mammals, amphibians, reptiles, fish, carrion, and various invertebrates. Loggerhead shrikes often impale their prey on thorns, barbed wire, or other sharp objects.

This species was detected across the California segment of the Project Area during multiple surveys and is a known breeder in the region. In addition, there are CNDDB and iNaturalist observations of this species within five miles of the Project Area. Based on the presence of loggerhead shrike observations during surveys, suitable nesting and foraging habitat, and recent records, the species has a high potential to occur nest and forage in the California segment of the Project Area.

Loggerhead shrikes were not observed within the Nevada segment of the Project Area during surveys, but this species is a known nester in the region. In addition, there are recent observations of this species along the transmission alignment (eBird, 2026). Based on the presence of recent records and suitable habitat, loggerhead shrikes have a high potential to forage and nest within the Nevada segment of the Project Area.

Phainopepla (*Phainopepla nitens*). The phainopepla is recognized as Sensitive species by the Nevada BLM and is a Nevada Watch List species. The phainopepla is a summer resident of California and Nevada east to west Texas and is present within the Project Area between May and September. This species is a well-known breeder in the Mojave Desert. The species occurs in a wide variety of habitat types including sparse palm oasis, desert wash, desert riparian, hardwood-conifer, mixed chaparral, and orchard-vineyard habitats. Phainopeplas are heavily dependent on mistletoe berries growing on mesquite, acacia, ironwood, cottonwood, and oaks as a food source. Nests are usually placed in the fork of a tree or inside a mistletoe plant. The species was observed within the California segment of the alignment; however, the species is not considered sensitive in California.

Phainopeplas were not observed within the Nevada segment of the Project Area. However, suitable nesting and foraging habitats are present within the desert wash habitats within the Project Area. There are iNaturalist and eBird records of this species within five miles of the Project Area (eBird, 2021). Based on the presence of nearby recent observations and the presence of suitable habitat, phainopeplas have a high potential to nest and forage within the Nevada segment of the Project Area.

Brewer's sparrow (*Spizella breweri*). Brewer's sparrow is considered Sensitive by the Nevada BLM and is a State of Nevada designated Sensitive Bird. This species is the smallest overall sparrow in North America, although its size varies somewhat by region and gender. It shares characteristics typical of the genus, including a slim build, a long-notched tail, short, rounded wings, and a small, sharply conical bill (Cornell Lab, 2025). Brewer's sparrows are dusky gray-brown, with grayish underparts and a streaked back and nape. A faint gray stripe over the eye contrasts with a darker eye line and white eye ring.

The Brewer's sparrow breeding range extends from the western provinces of Canada south across the western United States down to southern California and northern Arizona and New Mexico. Wintering grounds include the southwestern deserts of the United States south into Mexico. In California, this species is a common summer resident and breeder east of the Cascade-Sierre Nevada crest, in mountains and higher valleys of the Mojave Desert, and in the southern end of the San Joaquin Valley (Dobkin and Granholm, 1990). Nests are usually in the center of a small sagebrush or other shrub up to 3.9 feet (1.2 meters) above the ground. In winter, Brewer's sparrow is commonly found in open desert scrub and cropland habitats of the southern Mojave and Colorado Deserts, usually in areas with some herbaceous understory.

Brewer's sparrow was observed in California and Nevada during surveys. The Project Area supports suitable habitat and is within the range of the species. In addition, there are several records within five

miles of the Project Area. Therefore, Brewer's sparrow is expected to forage and nest in higher elevation portions of the Project Area in California and Nevada.

Crissal thrasher (*Toxostoma crissale*). Crissal thrasher is recognized as Sensitive by the California and Nevada BLM and is a CDFW Species of Special Concern. Crissal thrasher is a large, ground-dwelling songbirds found primarily in desert riparian habitats of the southwestern United States and northwestern Mexico. The range of the species extends from southeastern California east through southern Nevada, southwestern Utah, northern Arizona, and southwestern New Mexico to western Texas, and south into central Mexico and northeastern Baja California (Shuford and Gardali, 2008). In California, the species is typically restricted to desert washes and riparian thickets in the Mojave and Colorado Deserts, with the greatest abundance along the Colorado River and scattered occurrences westward into the Imperial and Coachella Valleys and north to the Providence Mountains (Shuford and Gardali, 2008). The Crissal thrasher is a year-round resident in California, breeding primarily from February through late July (Cody, 2020). Nests are built in dense shrubs, typically 3 to 8 feet above the ground, and constructed of twigs lined with finer vegetation. This species forages on the ground, probing leaf litter with its long, decurved bill for insects, spiders, seeds, and fruits.

Crissal thrasher was observed foraging during surveys in California. Suitable nesting and foraging habitat were observed within both segments of the Project Area. Records indicated higher density of species near the eastern portion of the Project Area, especially near the Clark Mountains with occurrences in the Nevada segment however, occurrences east of Baker are limited. Based on the presence of suitable nesting habitat and records east of Baker near the Clark Mountains, there is a high potential for crissal thrashers to forage and a moderate potential to nest within discrete habitat types within the eastern California segment of the Project Area. There is a high potential for crissal thrashers to forage and a moderate or potential to nest within the Nevada segment of the Project Area.

Verdin (*Auriparus flaviceps*). The verdin is recognized as Sensitive by the Nevada BLM and is a State of Nevada ranked S3 species. It is not considered special status in California. It is a year-round resident of arid habitats in Mexico and deserts of the southwest of the United States. It occurs in desert scrub or chaparral with thorny trees along washes with catclaw, paloverde, mesquite, tamarisk, juniper, ironwood, creosote bush, hackberry, smoke tree, desert lavender, willows, or where oaks are present.

Verdins were not observed in Nevada, however they are known to nest in the region. Verdins were observed in the California portion of the ROW east of SR-127 and west of Kingston Road. Suitable nesting and foraging habitat are present within the Project Area in California and Nevada, and this species should be considered a resident nester. In addition, there are iNaturalist and eBird records within five miles of the Project Area in California and Nevada. Based on the presence of suitable nesting and foraging habitat and recent records within the Project Area there is a high potential for Verdin to occur within the Project Area in Nevada.

Cooper's hawk (*Accipiter cooperii*). Cooper's hawk is a CDFW Watch List Species. Cooper's hawks primarily occur in woodland communities, but they are known from residential areas that support suitable nest trees. This species nests mainly in riparian growths of deciduous trees. The species is widespread across North America and is a year-round resident of southern California.

Suitable nesting habitat for this species was detected in the riparian woodland habitat associated with the Mojave River near the Victorville Switching Station. There are CNDDB, eBird, and iNaturalist records of this species within five miles of the Project Area including near the Victorville Switching Station and other locations in California and Nevada. In addition, this species was observed during the surveys in Nevada.

Based on the presence of suitable foraging habitat and proximity to suitable nesting habitat, there is a high potential for the species to occur within the California and Nevada segments of the Project Area.

Yellow-breasted chat (*Icteria virens*). Yellow-breasted chat is a CDFW Species of Special Concern. Although this species is a widespread summer resident in eastern North America, its distribution is much more fragmented in the west. In California, yellow-breasted chat primarily occurs in the northern portion of the state and is considered scarce in the central and southern portions. In southern California, this species utilizes dense riparian thickets and brushy tangles near watercourses for breeding (Garrett and Dunn, 1981). Similar habitat is used during migration (Dunn and Garrett, 1997). The yellow-breasted chat is the largest member of the warbler family (Parulidae). Its yellow throat and breast, olive underparts and white spectacles distinguish this species from other similar birds. The yellow-breasted chat breeds in April or May through August. Females initiate nest construction, which begins shortly after pair formation, above ground in dense shrubs along a river or stream. Both parents tend to nestlings until they fledge at roughly nine days (Stephenson and Calcarone, 1999).

Yellow-breasted chats were not observed during surveys, but suitable breeding habitat is located along the Mojave Rive near the Victorville Switching Station. Yellow-Breasted Chat Predicted Habitat occurs along the Mojave River northward towards Harvard Road (CDFW, 2024). The CNDDB includes a record of this species within the Mojave Narrows Regional Park. Based on the presence of suitable habitat and records along the Mojave River, yellow-breasted chat has a high potential to breed and forage within the Project Area.

Vermilion flycatcher (*Pyrocephalus rubinus*). Vermilion flycatcher is a CDFW Species of Special Concern. It is a year-round resident and summer resident within the Project Area. The species occurs throughout the southern United States and Mexico. It inhabits a variety of open habitats including arid scrublands, farmlands, deserts, parks, and canyon mouths. Within these habitats they are reliant on-stream corridors in areas where willow, sycamore, cottonwood, and mesquite occur. Nests primarily occur in desert riparian habitats often adjacent to irrigated fields and ditches.

Vermilion flycatchers were not observed during surveys of the Project Area. However, suitable nesting and foraging habitats are present in the agricultural areas and riparian habitats along the Mojave River. There are CNDDB, iNaturalist and eBird records within five miles of the Project Area. Based on the presence of suitable nesting and foraging habitat, and records of vermilion flycatchers in the Project Vicinity, this species has a moderate potential to nest and forage within the Project Area near the Mojave River.

Yellow warbler (*Setophaga petechia*). The yellow warbler is a CDFW Species of Special Concern. Although this species is primarily a summer resident, some small winter populations remain in the lowlands of southern California (Garrett and Dunn, 1981). Yellow warblers migrate annually between breeding grounds in North America and wintering grounds in the neotropics and are highly territorial on both breeding and wintering grounds (Lowther et al., 1999). During migration, yellow warblers form flocks and will often join with flocks of other species, including warblers, vireos, and flycatchers.

Yellow warblers were not observed within the Project Area. However, suitable nesting and foraging habitats are present along the Mojave River near the Victorville substation. There are CNDDB and iNaturalist includes records of the species within the Mojave River (i.e., Mojave Narrows Regional Park) south of the Project Area. In addition, this species has been recorded near Baker and Zzyzx. Based on the presence of suitable foraging habitat, records within the Mojave River, yellow warbler has a moderate potential to breed and a high potential forage within the Project Area in California.

Yellow-head blackbird (*Xanthocephalus xanthocephalus*). The yellow-headed blackbird is a CDFW Species of Special Concern. It is breeds across northern North American and winters in California south to Central America. Suitable breeding habitat consists of wetlands in prairies, mountain meadows, quaking aspen parklands, and shallow areas of marshes, ponds, and rivers.

A single yellow-headed blackbird was observed within the Project Area at Line 2 Tower 47-2. The Project Area is located outside of the breeding range of the species and suitable nesting habitat does not occur. This species is not expected to nest within the Project Area. There are multiple eBird records of non-breeding season observations within five miles of the Project Area. Based on the presence of suitable foraging habitat and known occurrences, yellow-headed blackbird has a high potential to occur within the Project Area during migration.

Desert kit fox (*Vulpes macrotis arsipus*). Desert kit fox is protected under Title 14, Section 460, California Code of Regulations, as well as the California Fish and Game Code (Sections 4000-4012), which defines kit fox as a protected furbearing mammal. It is also a Nevada Fur-bearing Mammal protected under Nevada Administrative Code NAC 503.025. Desert kit foxes are commonly found throughout arid regions of southern California and Nevada. Desert kit foxes occur in annual grasslands, or grassy open, arid stages of vegetation dominated by scattered herbaceous species. They prey on rabbits, ground squirrels, kangaroo rats, and various species of insects, lizards, and birds (Zeiner et al., 1990). Desert kit fox is primarily nocturnal, and inhabits open, flat areas with patchy shrubs. Friable soil is necessary for the construction of dens, which are used throughout the year for cover, thermoregulation, water conservation, and pup rearing.

Desert kit fox dens and their signs were routinely observed throughout the entire length of the Project Area and should be considered present (Attachment A, Figure 7). These observations included potential natal dens. Based on the presence of suitable habitat, document individuals, and den complexes during surveys, and known to occurrences, desert kit fox is expected to occur within the California segment of the Project.

Potential kit fox dens were also observed during surveys of the Nevada segment (Attachment A, Figure 7). In addition, there are iNaturalist records within five miles of the Project Area. Based on the presence of suitable habitat, document occurrences during surveys, desert kit fox has a high potential to be present within the Project Area in Nevada.

Pallid bat (*Antrozous pallidus*). The pallid bat is recognized as Sensitive by the California and Nevada BLM and is a protected mammal in Nevada. It is also a CDFW Species of Special Concern and a DRECP Covered species. The pallid bat is a large, pale-colored bat that occurs in arid and semi-arid regions of western North America, from British Columbia and central Mexico west to California and east to Texas. It is most common in desert basins and foothills with rocky outcrops and sparse vegetation (Hermanson and O'Shea 1983). This species is a resident of both Nevada and California. Roosts include rock crevices, caves, trees, mines, and man-made structures with day roots often in cliff-face crevices (summarized in Nevada Bat Working Group, 2024). In Nevada, winter roosting is not well known (NBWG, 2024). Guano piles may identify roosts sites (NWBG, 2024)

Pallid bat or sign of their roosts were not observed in California or Nevada during the surveys. However, this species is known to occur in the Mojave Desert. Therefore, based on known occurrences and presence of potential habitat this species has a moderate to high potential to occur in the Project Area in California and Nevada particularly in areas close to suitable roost sites.

Townsend's big-eared bat (*Corynorhinus townsendii*). The Townsend's big-eared bat is recognized as Sensitive by the California and Nevada BLM and is a Nevada Protected Mammal (NAC 503.030.1). It is also

a CDFW Species of Special Concern and a DRECP Covered species. Townsend's bats are most common in mesic habitats, such as coastal sites and riparian areas, but habitat associations are still quite varied (WBWG, 2017). More sensitive to disturbance than other species, the distribution of the Townsend's big-eared bat may be affected by presence of suitable roosting habitat, which is primarily, though not exclusively, undisturbed caves and mines. During hibernation, which usually occurs between October and April, Townsend's big-eared bats typically prefer habitats with relatively cold (but above freezing) temperatures in quiet, undisturbed sites often in more interior, thermally stable portions of caves and mines. During spring and summer, males are solitary while females establish maternity colonies in the warm parts of caves, mines, and buildings (Pierson et al. 1994). Night roosts may include buildings or other structures, such as bridges. Townsend's big-eared bats were not observed within the California segment of the Project Area; however, they are known to occur across the Mojave Desert. Suitable foraging habitat is present within the Project Area and there are CNDDB records within five miles of the Project Area. Based on the presence of suitable foraging habitat and recent records, Townsend's big-eared bat has high potential to forage and low potential to roost along the California segment of the Project Area.

Townsend's big-eared bats were not observed within the Project Area. Suitable foraging habitats are present within the Project Area. No iNaturalist observations of this species are within five miles of the Project Area. Based on the presence of suitable foraging habitat and a lack record records, Townsend's big-eared bat has moderate potential to forage but low potential to roost in the Nevada segment of the Project Area.

Mexican free-tailed bat (*Tadarida brasiliensis*). Mexican free-tailed bat is recognized as Sensitive by the Nevada BLM and is considered a Protected Mammal in Nevada. It occurs throughout the southern and western United States, Central America, and south America. This species is known to migrate long distance but may also travel short distance seasonally (NWBG, 2024). Overwintering populations occur in southern U.S. and Mexico. This species is a fast free-flier foraging for moths predominantly in open valley bottoms to high altitudes. Roosts have large open areas and required spacious roosts with large entrance openings (NWBG, 2024).

This species was not observed during surveys; however, it is known to occur across the Mojave Desert where suitable roost locations occur. Based on the suitable foraging habitat and known occurrences, this species has a high potential to forage but low potential to roost in the Project Area in California and Nevada.

American badger (*Taxidea taxus*). American badger is a CDFW Species of Special Concern. Badger was once widespread throughout open grassland habitats of California. It is now an uncommon, permanent resident throughout most of California. This species is found in open shrubland, forest, and herbaceous habitats with friable soils. In the southwest, badgers are typically associated with creosote bush and sagebrush shrublands. Badgers are fossorial, digging large burrows in dry, friable soils and use multiple dens and cover burrows within their home range. Badgers move among burrows daily, although they can use a den for a few days at a time. Badger home range sizes are dependent upon prey availability and other habitat characteristics. In general, home ranges are several hundred acres in size. This species feeds mainly on small mammals, especially ground squirrels, pocket gophers, rats, mice, and chipmunks. Badgers also prey on birds, eggs, reptiles, invertebrates, and carrion. The diet shifts seasonally and yearly depending upon prey availability.

American badgers were not observed during surveys of the California segment. However, over 19 potential badger dens, and signs such as tracks, scratch marks, and scat were observed (Attachment A, Figure 7). There are several CNDDB and iNaturalist records within five miles within the Project Area and this species should be considered present along most of the alignment although the proximity to roads

and OHV activity may dissuade badgers from using some areas. Based on the observations during the surveys, presence of suitable habitat, and recent records, American badgers have a high potential to occur within the Project Area. The remains of an American badger and badger sign were observed during the surveys within the Nevada segment, but the species is not considered sensitive in Nevada.

5.0 Designated Critical Habitat and Special Habitat Designations

5.1 Designated Critical Habitat

The ESA identifies critical habitat as specific geographic areas that contain features essential to the conservation of an endangered or threatened species that may require special management and protection. Critical habitat may also include areas that are not currently occupied by the species but will be needed for its recovery. The USFWS publishes proposals to designate critical habitat in the *Federal Register*, a daily publication of the federal government. Following a public review and comment period, the designation may be refined and then a final critical habitat designation is published. The final designation specifies physical or biological features (i.e., primary constituent elements) essential to the conservation of a listed species and are those features that a species requires to survive and reproduce. General features include: (1) space for individuals and population growth and for normal behavior; (2) food, water, air, light, minerals, or other nutritional requirements; (3) cover or shelter; (4) sites for breeding, reproduction, or rearing offspring; and, generally, (5) habitats that are protected from disturbance or are representative of the historic geographical and ecological distributions of this species.

Desert tortoise. The Project Area is located within designated critical habitat for desert tortoise (Attachment A, Figure 5 and 9). The Project ROW crosses desert tortoise critical habitat in four sections of the ROW in California and Nevada. These include the Ivanpah, Superior-Cronese, Ord-Rodman and Piute-Eldorado critical habitat units. Critical habitat was designated for desert tortoise on February 8, 1994. The designation encompasses more than 6.4 million acres across numerous counties in Arizona, Utah, Nevada, and California. The USFWS defined specific physical and biological features essential to the conservation and recovery of desert tortoise as sufficient space to support viable populations within each of the six recovery units and to provide for movement, dispersal, and gene flow; ensure sufficient quality and quantity of forage species and the proper soil conditions to provide for the growth of these species; protect suitable substrates for burrowing, nesting, and overwintering, burrows, caliche caves, and other shelter sites; maintain sufficient vegetation for shelter from temperature extremes and predators; and ensure that habitat is protected from disturbance and human-caused mortality (USFWS, 2024b).

Southwestern willow flycatcher. The Project Area is located adjacent to the Mohave River Critical habitat unit for southwestern willow flycatcher (Attachment A, Figure 5). Critical habitat was designated for southwestern willow flycatcher on February 27, 1995. The revised designation encompasses more than 370,000 acres across numerous counties in Arizona, New Mexico, Utah, Colorado, Nevada, and California. The USFWS defined specific physical and biological features essential to the conservation and recovery of southwestern willow flycatcher as: the riparian vegetation ecosystem within the 100-year floodplain or flood-prone area, including areas where dense riparian vegetation is not present but through succession can be expected to become established in the future. Flycatchers use riparian habitat for feeding, shelter, and cover while breeding and migrating (USFWS, 2005).

5.2 National Wilderness Areas

The Project Area is located outside of the National Monument and National Wilderness Areas. However, several access roads are located within or adjacent to wilderness areas (Attachment A, Figure 4). The Project Area is near the North and South McCullough Wilderness and is north of the Avi Kwa Ame National Monument in Nevada. In Calif r ornia, the Project Area is near the Stateline Wilderness, Mesquite Wilderness, Kingston Range Wilderness, Avawatz Mountains Wilderness, Hollow Hills Wilderness, Soda Mountains Wilderness, and the Newberry Mountains Wilderness aeas. The Project Area includes Kingston Road east of the East Mojave National Scenic Area and Death Valley Road between the Hollow Hills Wilderness and the Soda Mountains Wilderness Study Area.

5.3 Areas of Critical Environmental Concern (ACECs)

The Project Area extends through, or is adjacent, to several ACECs. These include the Piute-Eldorado, Ivanpah, Shadow Valley, Soda Mountain WSA, Soda Mountain Expansion, Superior-Cronese, Daggett Ridge Monkey Flower, Ord-Rodman, Northern Lucerne Wildlife Linkage, and Brisbane Valley Flower (Attachment A, Figure 4).

5.4 Clark County Multiple Species Habitat Conservation Plan

The McCullough Substation and a portion of the Project ROW are located within the Clark County Multiple Species Habitat Conservation Plan (MSHCP) area. This includes the Boulder City Conservation Easement (Conservation Easement), which was obtained in 1995 for the protection of desert tortoise and other MSHCP species (Clark County, 2023). MSCHP watch list species barrel cactus (*Ferocactus cylindraceus*) and rosy two-toned beardtongue (*Penstemon bicolor* ssp. *roseus*) have been documented within the Boulder City Conservation Easement (Clark County, 2023) and along Project Access roads. Desert tortoises are known within the Conservation Easement, which is within the Eastern Mojave Recover Unit and Piute-Eldorado Valley Critical Habitat Unit. Suitable habitats for various covered and MSHCP-evaluated species are present within the Conservation Easement and surrounding areas. These species include desert iguana (*Dipsosaurus dorsalis*), phainopepla (*Phainopepla nitens*), Arizona bell's vireo (*Vireo bellii arizonae*), Mojave rattlesnake (*Crotalus scutulatus scutulatus*), speckled rattlesnake (*Crotalus mitchelli*), banded Gila monster (*Heloderma suspectum cinctum*), LeConte's thrasher (*Toxostoma lecontei*), and loggerhead shrike (*Lanius ludovicianus*).

6.0 Wildlife Corridors, Special Linkages, and Important Bird Areas

An important component to biodiversity and ecosystem health is the ability for plants and wildlife to move among local populations in adjacent areas. In the short term, movement can support demographic stability of small, localized populations. In the longer term, it can maintain genetic diversity among semi-isolated local populations. This is accomplished by the movement or dispersal of pollen in the wind, seeds transported by birds or animals to other areas, and the dispersal of animals to adjacent habitat. Development, including clearing lands or constructing roads, can hinder this process and isolate species from adjacent populations. In many instances this is species specific and depends on the ecology and behavior of the species.

The ability for wildlife to move freely among populations and habitat areas is important to long-term genetic variation and demography. Fragmentation and isolation of natural habitat may cause loss of native species diversity in fragmented habitats. In the short term, wildlife movement may also be important to

individual animals' ability to occupy their home ranges if their ranges extend across a potential movement barrier. These considerations are especially important for rare, threatened, or endangered species and for wide-ranging species such as large mammals, which exist in low population densities.

Depending on home ranges, territories, and the needs of a species, habitat patches can lose entire species when they are no longer large enough to support the species' requirements. Some species may persist, but often population sizes are restricted. The smaller the patch size, the greater the loss of biodiversity (number of species inhabiting the patch). For populations that remain, the loss of connectivity to other populations can result in genetic divergence between discrete populations (i.e., isolated populations become increasingly different from each other genetically). The result is a population that is less genetically robust and more susceptible to extirpation, or localized extinction, than a population with more genetic diversity. Therefore, development patterns that maintain connectivity and avoid creating isolated patches, particularly small patches, are needed to maintain healthy ecosystems.

Wildlife corridors and functions must be evaluated in the context of individual species and their ecology. For example, low-mobility species including snakes, lizards, and small mammals often have restricted home ranges. Animals in this group reproduce with animals in adjacent habitat and gene flow moves slowly along a region. Conserving open areas and linkages is important to prevent these types of species from becoming isolated from other populations. Wide-ranging species, including mountain lions, have broad territories that require the preservation of wildlife corridors and linkages to natural lands.

6.1 Wildlife Movement

Movement and dispersal corridors that connect large blocks of habitat are essential to the long-term viability of plant and wildlife populations. The California Essential Habitat Connectivity Project (Connectivity Project) was commissioned by the California Department of Transportation (Caltrans) and CDFW to create a statewide assessment of essential habitat connectivity to be used for conservation and infrastructure planning (Spencer et al., 2010). One of its goals was to create the Essential Connectivity Map, which depicts large, relatively natural habitat blocks that support native biodiversity (Natural Landscape Blocks) and areas essential for ecological connectivity between them (Essential Connectivity Areas). These maps do not reflect the needs of a particular species but are based on overall biological connectivity and ecological integrity.

In the Project Area, mountain ranges and valleys provide corridors for wildlife movement. One such corridor, or Essential Connectivity Area (ECA), is the Mid Hills/Ivanpah Valley/New York Mountains/Calico Mountains ECA located within the eastern portion of the Project Area. Another ECA within the Project Area is the San Bernardino Mountains/Calico Mountains ECA (Attachment A, Figure 4). Wildlife that use these corridors include large mammals like desert bighorn sheep and smaller reptiles like desert tortoise. Migratory birds (such as raptors, wading birds, and flycatchers) that utilize the Pacific Flyway or Audubon Important Birds Areas (Attachment A, Figure 4), may find suitable habitat within or near the Project area.

Wildlife corridors are defined as areas that connect suitable habitats for a species in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features (e.g., canyon drainages, ridgelines, or areas with vegetation cover) provide corridors for wildlife travel. Wildlife corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high-population-density areas; and facilitate gene flow between populations. Wildlife corridors are considered sensitive by resource and conservation agencies.

In the Project Area, the existing utility transmission line does not pose a significant barrier to the movement of wildlife. However, on a local scale the berms that are present along access roads can hinder

direct line of movement for small species such as desert tortoise who can become trapped within steeply graded roadbeds.

6.2 Important Bird Areas

The Audubon Society has identified Important Bird Areas (IBAs) throughout the western hemisphere that provide essential habitat for birds (Audubon, 2026). Although IBAs are non-regulatory designations, they provide important contextual information in determining the types of birds that are occurring in regions within and around the IBA along with the way in which habitats within those regions are being utilized by avian species. These IBAs include sites for breeding, wintering, and migrating birds and can range from only a few acres to thousands of acres in size.

The Project ROW is near three designated Important Bird Areas (IBA). The Project ROW is approximately 650 feet or greater from the northern extent of the East Mojave Peaks in the Clark Mountain range. The east section of the North Mojave Dry Lakes (adjacent to SR-127) intersects with approximately one mile of Project ROW from towers L1, 72-4 and L2, 71-5 to approximately L1, 73-4 and L2, 73-1. Lastly, the Project ROW crosses the Mojave River IBA. In Nevada, the Wee Thump Joshua Tree Forest IBA is more than 10 miles south of the Project ROW.

The West Mojave Peaks IBA consists of three mountain ranges that reach high elevations (Audubon, 2026). Joshua tree woodland is on lower slopes, desert chaparral at middle elevations, and pinyon-juniper woodland in higher elevations. Species known to occur in this IBA include Bendire's thrasher, juniper titmouse, and Scott's Oriole. In the New York Mountains, the state endangered gilded flicker is known to occur. Broad-tailed hummingbird, black-chinned sparrow, Bell's sparrow, plumbeous vireo, and Virginia's warbler are common species that inhabit chaparral and pinyon woodland, and gray vireo may be found in steep-sloped canyons. In addition, golden eagle, prairie falcon, and peregrine falcon may nest on rock faces in the Clark Mountains. As defined under the overall North Mojave Dry Lakes IBA bird activity at large dry lakes in the Mojave Desert is relatively quiet in the winter. However, by late March, migratory waterfowl and shorebirds begin to gather, which can bring thousands of waterbirds into large dry lakes throughout the region. The Mojave River IBA supports a wide band of Fremont cotton-willow woodland that support brown-crested flycatchers, summer tanagers, and vermilion flycatchers. Least Bell's vireos have been known to occur in this area.

7.0 Surface Water Features

7.1 Jurisdictional Waters and Wetlands

The Project ROW generally extends in a north–south orientation and runs roughly parallel to I-15 traversing existing transportation and utility corridors as well as relatively intact portions of the Mojave Desert. Except for the Mojave River, the hydrology of the region is largely characterized by a broad network of ephemeral drainages. When rain occurs the surface hydrology is dominated by short-duration, high-energy runoff events that occur infrequently but can transport large volumes of sediment and water over relatively brief periods of time. These drainages occur on various bajadas, alluvial fans, and within more narrowly defined areas. The Project ROW also crosses or is near a series of dry lakes or large seasonal depressions.

A preliminary assessment of jurisdictional features in the Project Area was conducted between April and August 2022. A supplemental delineation was conducted in 2026. The 2022 delineation identified approximately 2,800 drainages in the broader Project Area including locations that would not be subject to project related disturbance. These included waters regulated by the CDFW, U.S. Army Corps of

Engineers (USACE), State Water Resources Control Board (SWRCB), and Nevada Waters of the State regulated by the Nevada Division of Environmental Protection (NDEP). Based on the results of the 2022 delineation field work, it was determined that the total amount of jurisdictional resources in the survey area includes:

USACE Jurisdictional Waters

- Wetlands: 0.00 acre
- Non-wetland waters: 269.42 acres

SWRCB Jurisdictional Waters

- Wetlands: 0.00 acre
- Non-wetland waters: 269.42 acres
- Non-wetland "isolated" waters: 1,359.99 acres
- Total SWRCB waters: 1,629.41

CDFW Jurisdictional Streambeds

- Streambeds/Riparian Habitat: 1,757.60 acres

NDEP Jurisdictional Waters

- Non-wetland waters: 379.23 acres

8.0 Regulatory Environment

8.1 Federal Regulations and Plans

National Environmental Policy Act. The National Environmental Policy Act of 1969 (NEPA) requires all federal agencies to examine the environmental impacts of their actions, incorporate environmental information, and utilize public participation in the planning and implementation of all actions. Federal agencies must integrate NEPA with other planning requirements and prepare appropriate NEPA documents to facilitate better environmental decision making. NEPA requires federal agencies to review and comment on federal agency environmental plans/documents when the agency has jurisdiction by law or special expertise with respect to any environmental impacts involved (42 U.S.C. 4321- 4327) (40 CFR 1500-1508).

Endangered Species Act. The federal Endangered Species Act (ESA) designates and provides for protection of threatened and endangered plant and animal species, and their critical habitat. Its purpose is to protect and recover imperiled species and the ecosystems on which they depend. It is administered by the USFWS and the National Marine Fisheries Service. The USFWS is responsible for terrestrial and freshwater organisms while National Marine Fisheries Service is responsible for marine wildlife. Species may be listed as endangered or threatened. All species of plants and animals, except pest insects, are eligible for listing. Species are defined to include subspecies, varieties, and for vertebrates, distinct population segments. The ESA protects endangered and threatened species and their habitats by prohibiting the "take" of listed animals and the interstate or international trade in listed plants and animals, including their parts and products, except under a federal permit. "Take" is broadly defined in the ESA to include "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in any such conduct" (16 U.S.C., § 1532 [19]). Take can also include significant habitat modification or degradation that directly results in death or injury to a listed wildlife species by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering (50 C.F.R., § 17.3). Take of federally listed species as defined in

the ESA is prohibited without incidental take authorization, which may be obtained through Section 7 consultation (between federal agencies) or a Section 10 Habitat Conservation Plan.

Federal Land Policy and Management Act. The Federal Land Policy and Management Act (FLPMA) provide a regulatory framework for the management and use of BLM resources. An important aspect of the FLPMA is that it supports multiple uses on public lands. In addition, under the FLPMA, BLM regulates ROWs for electrical power generation, transmission and distribution systems, systems for the transmission and reception of electronic signals and other means of communication, pipelines (other than oil and gas), railroads, highways, and other facilities or systems developed in the interest of the public.

California Desert Conservation Area Plan. The CDCA is an approximately 25-million-acre expanse of land in Southern California that was designated by Congress in 1976 through the FLPMA. Approximately 10 million acres are administered by BLM, including all BLM lands in the California Desert region (BLM 1980). The CDCA Plan is a comprehensive, long-range plan for the management, use, development, and protection of lands within the CDCA, and it is required as part of the FLPMA and implemented by BLM. CDCA established direction on uses and management actions on BLM lands addressing a range of plan elements, including Cultural, Native American, Wildlife, Vegetation, Wilderness, Wild Horse and Burro, Livestock Grazing, Recreation, Motorized-Vehicle Access, Geology, Energy and Mineral Resources, Energy Production and Utility Corridors, and Land Tenure Adjustment.

The CDCA Plan also established multiple-use classes and Areas of Critical Environmental Concern (ACECs) on BLM lands in the CDCA. ACECs are special management areas established by the BLM to protect and prevent irreparable damage to important historical, cultural, and scenic values; fish or wildlife resources, or other natural systems or processes; or to protect human life and safety from natural hazards.

The CDCA Plan was amended by the DRECP Land Use Plan Amendment (LUPA) in September 2016, which is discussed below.

Desert Renewable Energy Conservation Plan. The DRECP is a planning document developed by the California Energy Commission (CEC) and BLM to advance federal and state natural energy and resource conservation goals and other federal land management goals; meet the requirements of the ESA and FLPMA; and facilitate the timely and streamlined permitting of renewable energy projects in the Mojave and Colorado/Sonoran Desert regions of Southern California. The DRECP covers approximately 22.5 million acres in the desert regions of Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino, and San Diego Counties.

DRECP LUPA amended the CDCA with designations of Development Focus Areas (DFAs) and conservation areas on BLM lands. DRECP LUPA also prescribes Conservation and Management Actions (CMAs), which are a specific set of avoidance, minimization, and compensation measures that protect important biological and natural resources in the DRECP planning area. The CMAs include allowable and non-allowable actions for siting, design, pre-construction, construction, maintenance, implementation, operation, and decommissioning activities of renewable energy projects on BLM-managed land.

DRECP LUPA made substantial changes to the CDCA framework and superseded many previous decisions and amendments for BLM lands in the California Desert region. The DRECP LUPA eliminated multiple-use classes and replaced them with conservation and management actions, established new National Conservation Lands (NCLs), revised, and added ACECs, and established other designations on BLM lands for renewable energy and recreation, among other changes.

West Mojave Plan. The West Mojave Plan was envisioned to develop management strategies for the Mojave Desert tortoise (“desert tortoise”), Mohave ground squirrel, and more than 100 other sensitive

plants and animals. The planning area encompassed approximately 9.3 million acres in Inyo, Kern, Los Angeles, and San Bernardino Counties, including approximately 3.3 million acres of public lands administered by BLM, approximately 3 million acres of private lands, and approximately 102,000 acres administered by the State of California. The remaining land is military land administered by the Department of Defense. The West Mojave Plan was proposed to conserve those species throughout the western Mojave Desert, while streamlining the West Mojave Plan for compliance with the regulatory requirements of the ESA and CESA. Only the BLM elements of the West Mojave Plan were adopted, resulting in several amendments to the CDCA Plan. In 2019, the BLM amended the CDCA plan for the West Mojave Route Network Project to address motor vehicle access, recreation, and livestock grazing elements in the West Mojave Planning Area (BLM, 2019).

West-Wide Energy Corridor Plan. The West-Wide Energy Corridor Plan was established under Section 368 of the Energy Policy Act of 2005, directing federal agencies to designate energy corridors across 11 western states for oil, gas, hydrogen pipelines, and electricity transmission and distribution. The corridors serve as preferred locations for future energy transport infrastructure to streamline permitting and reduce environmental conflicts.

Bald and Golden Eagle Protection Act. The bald eagle *(Haliaeetus leucocephalus)* and golden eagle *(Aquila chrysaetos)* are federally protected under the Bald and Golden Eagle Protection Act (BGEPA), which was passed in 1940 to protect the bald eagle and amended in 1962 to include the golden eagle (16 USC Section 668a–d). BGEPA prohibits the take, possession, sale, purchase, barter, offering to sell or purchase, export or import, or transport of bald eagles and golden eagles and their parts, eggs, or nests without a permit issued by USFWS. The definition of "take" includes to pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest, or disturb.

BGEPA prohibits any form of possession or take of either eagle species, and imposes criminal and civil sanctions, as well as an enhanced penalty provision for subsequent offenses. Further, BGEPA provides for the forfeiture of anything used to acquire eagles in violation of the statute. Regarding its prohibitions on possession, the statute exempts the use of eagles or eagle parts for exhibition, scientific, and Native American religious uses.

Migratory Bird Treaty Act. The Migratory Bird Treaty Act (MBTA) prohibits the intentional and unintentional take of any migratory bird or any part, nest, or eggs of any such bird. Under the MBTA, "take" is defined as pursuing, hunting, shooting, capturing, collecting, or killing, or attempting to do so (16 USC 703 et seq.). Currently, the Migratory Birds Office considers nests that support eggs, nestlings, or juveniles to be active. Additionally, Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, requires that any project with federal involvement address impacts of federal actions on migratory birds with the purpose of promoting conservation of migratory bird populations (66 FR 3853–3856).

Executive Order 13186, Responsibilities of Federal Agencies to Protect Migratory Birds. Directs federal agencies to review the effects of actions and agency plans on migratory birds according to NEPA or other established environmental review processes, with emphasis on species of concern (Section 6 of the order) and identify unintentional take reasonably attributable to agency actions, focusing first on species of concern, priority habitats, and key risk factors and to develop and use principles, standards, and practices to lessen the amount of unintentional take (Section 9).

Bureau of Land Management Manual (6840). BLM is required to conserve BLM special status species and the ecosystems the species depend on in BLM-administered lands. The Special Status Species Management Manual 6840 describes designate sensitive species is described as "(1) species is listed or

proposed for listing under the Endangered Species Act, and (2) species requiring special management consideration to promote their conservation and reduce the likelihood and need for future listing under the ESA, which are designated as Bureau sensitive by the State Director(s)." (BLM, 2008).

Clean Water Act. The Clean Water Act (CWA) provides guidance for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters. Section 401 requires a project operator for a federal license or permit that allows activities resulting in a discharge to waters of the United States to obtain state certification, thereby ensuring that the discharge will comply with provisions of the CWA. The Regional Water Quality Control Boards (RWQCBs) administer the certification program in California. Section 402 establishes a permitting system for the discharge of any pollutant (except dredged or fill material) into waters of the United States. Section 404 establishes a permit program administered by the U.S. Army Corps of Engineers (USACE) that regulates the discharge of dredged or fill material into waters of the United States, including wetlands. USACE implementing regulations are found at 33 Code of Federal Regulations (CFR) Parts 320 through 332. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines, which were developed by the U.S. Environmental Protection Agency (EPA) in conjunction with USACE (40 CFR 230). The guidelines allow the discharge of dredged or fill material into the aquatic system only if there is no practicable alternative that would have less adverse impacts.

Wetlands and Other Waters of the United States. The definition of waters of the United States establishes the geographic scope for authority under Section 404 of the CWA; however, the CWA does not specifically define waters of the United States, leaving the definition open to statutory interpretation and agency rulemaking. The definition of what constitutes "waters of the United States" (provided in 33 CFR Section 328.3[a]) has changed multiple times over the past few decades, starting with the United States v. Riverside Bayview Homes Inc. court ruling in 1985. Subsequent court proceedings, rule makings, and congressional acts in 2001 (Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers), 2006 (Rapanos v. United States), 2015 (Clean Water Rule), 2018 (suspension of the Clean Water Rule), 2019 (formal repeal of the Clean Water Rule), 2020 (Navigable Waters Protection Rule), and 2021 (Pasqua Tribe et al. v. EPA resulting in remand and vacatur of the Navigable Waters Protection Rule and a return to "the pre-2015 regulatory regime") have attempted to provide greater clarity to the term and its regulatory implementation. On December 30, 2022, the agencies announced the final Revised Definition of "Waters of the United States" rule (Rule) (88 CFR 3004–3144). The Rule was published in the Federal Register on January 18, 2023, and became effective on March 20, 2023, restoring federal jurisdiction over waters that were protected prior to 2015 under the Clean Water Act for traditional navigable waters, the territorial seas, interstate waters, and impoundments of waters otherwise defined as waters of the United States.

Fish and Wildlife Coordination Act. Applies to any federal project where the waters of any stream or other body of water are impounded, diverted, deepened, or otherwise modified. Requires consultation among and State wildlife agencies. Implemented through the NEPA process and Section 404 permit process.

Plant Protection Act of 2000. Prevents importation, exportation, and spread of pests that are injurious to plants, and provides for the certification of plants and the control and eradication of plant pests. The Act consolidates requirements previously contained within multiple federal regulations including the Federal Noxious Weed Act, the Plant Quarantine Act, and the Federal Plant Pest Act.

Federal Noxious Weed Act of 1974. Defines a noxious weed as any living stage of a plant that can directly or indirectly injure crops, other useful plants, livestock, poultry, or other interests of agriculture including irrigation, navigation, the fish and wildlife resources of the U.S., or public health. The act also:

- Regulates the sale, purchase, and transportation of noxious weeds into or through the U.S.,
- Regulates the inspection and quarantine of areas suspected of infestation and provides for the disposal or destruction of infested products, articles, means of conveyance, or noxious weeds,
- Provides for fines of up to $5,000 and/or imprisonment up to one year for violation of the regulation and,
- Requires federal agencies to work with state and local agencies to develop and implement noxious weed management programs on Federal lands.

Executive Order 13112. Executive Order 13112, issued in February 1999, established the National Invasive Species Council, and directed federal agencies to prevent the introduction and spread of invasive species. It requires agencies to identify, control, and monitor invasive species, and to avoid actions likely to cause or promote their spread, while coordinating efforts across departments and with stakeholders.

8.2 State of California Regulations

California Environmental Quality Act (CEQA). CEQA requires identification of a project's potentially significant impacts on biological resources, and ways that such impacts can be avoided, minimized, or mitigated. CEQA also provides guidelines and thresholds for use by lead agencies for evaluating the significance of proposed impacts.

The CEQA Guidelines Section 15380(b)(1) defines endangered animals or plants as species or subspecies whose "survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors." A rare animal or plant is defined in CEQA Guidelines Section 15380(b)(2) as a species that, although not presently threatened with extinction, exists "in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or … [t]he species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered 'threatened' as that term is used in the federal Endangered Species Act." Additionally, an animal or plant may be presumed to be endangered, rare, or threatened if it meets the criteria for listing, as defined further in CEQA Guidelines Section 15380(c).

CDFW has developed a list of "Special Species" as "a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status." This is a broader list than those species that are protected under the federal ESA, CESA, and other California Fish and Game Code provisions, and includes lists developed by other organizations, including, for example, the Audubon Watch List. Guidance documents prepared by other agencies, including the California BLM Sensitive Species and USFWS Birds of Conservation Concern (BCC), are also included on this CDFW Special Species list. Additionally, CDFW has concluded that plant species listed as a California Rare Plant Rank (CRPR) 1 and 2 by the California Native Plant Society (CNPS), and potentially some CRPR 3 plants, are covered by CEQA Guidelines Section 15380.

Section IV, Appendix G, Environmental Checklist Form, of the CEQA Guidelines requires an evaluation of impacts to "any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or the USFWS."

California Endangered Species Act (Fish and G. Code, §§ 2050 – 2098). The California Endangered Species Act (California Fish and Game Code Sections 2050–2068) provides protection and prohibits the take of plant, fish, and wildlife species listed by the State of California. The California Endangered Species Act (CESA) of 1984 states that all native species of plants, invertebrates, fish, amphibians, reptiles, birds, and mammals, and their habitats, threatened with extinction and those experiencing a significant decline

which, if not halted, would lead to a threatened or endangered designation, will be protected and preserved. CESA prohibits the take of any species of wildlife designated by the California Fish and Game Commission as endangered, threatened, or candidate species. The CDFW may authorize the take of any such species if certain conditions are met. These criteria are listed in Title 14 of the California Code of Regulations, Section 783.4, subdivisions (a) and (b). For purposes of CESA, "take" means to hunt, pursue, catch, capture, or kill (California Fish and G. Code, § 86).

Take authorization may be obtained by a project applicant from CDFW under CESA Section 2081, which allows take of a listed species for educational, scientific, or management purposes. In this case, private developers consult with CDFW to develop a set of measures and standards for managing the listed species, including full mitigation for impacts, funding of mitigation implementation, and monitoring of mitigation measures.

Western Joshua Tree Conservation Act (WJTCA). On July 1, 2023, the Western Joshua Tree Conservation Act (WJTCA) was passed. While western Joshua tree is a candidate species, take for western Joshua tree can be received through payment of pre-determined mitigation fees. The WJTCA introduces a streamlined permitting framework that applies to specific development activities and mandates the collection of mitigation fees. These fees are intended to facilitate the acquisition and preservation of western Joshua tree habitat, as well as to support conservation measures aimed at safeguarding the western Joshua tree. The underlying goal is to counterbalance the adverse impacts on western Joshua trees resulting from authorized projects and to promote species conservation on a landscape scale.

Under the WJTCA, CDFW is authorized to perform the following key functions:

- Issue permits for the trimming and removal of hazardous or deceased western Joshua trees.
- Grant permits for the incidental take of western Joshua trees, contingent upon the fulfillment of specific conditions.
- Establish agreements with counties or cities to delegate limited authority for the issuance of the aforementioned permits, provided that predetermined conditions are met.

The WJTCA institutes two categories of mitigation fees: reduced fees and standard fees, depending on the geographical location, as defined in the California Department of Fish and Game Code (Section 1927). It empowers the CDFW to issue permits for the incidental take of one or more western Joshua trees, subject to compliance with stipulated conditions. Permit holders may opt to remit specified fees in lieu of undertaking mitigation activities. Additionally, the WJTCA authorizes the CDFW to issue permits for the removal of deceased western Joshua trees and the trimming of live western Joshua trees under specific circumstances.

Notably, all in-lieu fees collected under the WJTCA are directed to the Western Joshua Tree Conservation Fund, with the explicit purpose of allocation to the CDFW. These funds are designated exclusively for the acquisition, conservation, and management of western Joshua tree conservation lands, as well as the execution of other initiatives designed to safeguard the western Joshua tree.

The initial step in the permitting process necessitates the comprehensive survey and documentation of western Joshua trees located on a project site as well as within a 50-foot radius surrounding the Project area. This census must adhere to precise specifications outlined on the CDFW's official website.

California Desert Native Plants Act. The purpose of the California Desert Native Plants Act (CDNPA) is to protect certain species of California desert native plants (i.e., species in the families Agavaceae, Cacti, Fouquieriaceae; species in the genus Prosopis and Parkinsonia (Cercidium); and the species *Acacia greggii*, *Atriplex hymenelytra*, *Dalea spinosa*, and *Olneya tesota*) from unlawful harvesting. The CDNPA only

applies within the boundaries of Imperial, Inyo, Kern, Los Angeles, Mono, Riverside, San Bernardino, and San Diego Counties. Within these counties, the CDNPA prohibits the harvest, transport, sale, or possession of specific native desert plants unless a person has a valid permit or wood receipt, and the required tags and seals. The appropriate permits, tags, and seals must be obtained from the sheriff or commissioner of the county where collecting will occur, and the county will charge a fee. More information on the CDNPA, including the species protected under the law, is available by reading the provisions of the law.

California Code of Regulations (Title 14, §251.1, 460, 670.2 and 670.5). California Code of Regulations (CCR) Title 14, Section 670.2 and 670.5 implement CESA, including providing a list of species and defining "take.

Regulations are in place protecting furbearing mammals as follows:

- CCC, Title 14, Section 251.1 prohibits the harassment of any furbearing mammal. Harass is defined as an intentional act that disrupts an animal's normal behavior patterns, which includes, but is not limited to, breeding, feeding, or sheltering.
- California Code of Regulations, Title 14, Section 460 states that fisher, marten, river otter, desert kit fox, and red fox may not be taken at any time.

Fully Protected Designations (Fish and Game Code Sections 2081.5, 3511, 4700, 5050, and 5515). Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code outline protections for fully protected species of mammals, birds, reptiles, amphibians, and fish. Species that are fully protected by these sections may not be taken or possessed at any time. CDFW cannot issue permits or licenses that authorize the "take" of any fully protected species, except under certain circumstances, such as scientific research or under a Natural Community Conservation Planning (NCCP) (Fish and Game Code § 2835). "Take" means hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (Fish and Game Code § 86).

Senate Bill 147 was signed into law on July 1, 2024, and remains in effect until December 31, 2033. Fish and Game Code Section 2081.5 allows CDFW to authorize take of fully protected species, if the action is incidental to a project, for five specific types of projects including certain water agency projects, transportation, wind, or solar (including electric transmission). Additionally, the fully protected species list was modified removing American peregrine falcon (*Falco peregrinus anatum*), brown pelican (*Pelecanus occidentalis*), and thicktail chub *(Gila crassicauda)* from the fully protected list.

California Lake and Streambed Alteration Notification/Agreement (Fish and G. Code, §§ 1602 et seq.). Section 1602 of California Fish and Game Code requires that a streambed alteration application be submitted to the CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake." The CDFW reviews the proposed actions and, if necessary, submits to the applicant a proposal for measures to protect affected fish and wildlife resources. Often, projects that require a streambed alteration agreement also require a permit from the USACE under Section 404 of the Clean Water Act. In these instances, the conditions of the Section 404 permit and the streambed alteration agreement may overlap.

California Native Plant Protection Act. The Native Plant Protection Act of 1977 (Sections 1900 et seq. of the California Fish and Game Code) directed CDFW to carry out the Legislature's intent to "preserve, protect and enhance rare and endangered plants in this State." The Native Plant Protection Act gave the California Fish and Game Commission the power to designate native plants as "endangered" or "rare," and protect endangered and rare plants from take. CESA expanded the original Native Plant Protection Act and enhanced legal protection for plants, but the Native Plant Protection Act remains part of the California Fish and Game Code. To align with federal regulations, the categories of "threatened" and

"endangered" species were added to CESA. All "rare" animals in CESA were converted to "threatened," but this did not change for rare plants. Thus, there are three categories for plants in California: rare, threatened, and endangered. Because rare plants are not included in CESA, mitigation measures for impacts to rare plants are specified in a formal agreement between CDFW and project proponents.

Native Birds (Fish and Game Code Sections 3503, 3503.5, 3513, and 3800). Section 3503 of the California Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 protects all birds of prey (raptors) and their eggs and nests. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. Section 3800: All birds occurring naturally in California that are not resident ga me birds, migratory game birds, or fully protected birds are nongame birds. It is unlawful to take any nongame bird except as provided in this code or in accordance with regulations of the commission or, when relating to mining operations, a mitigation plan approved by the department.

Porter–Cologne Water Quality Control Act. Pursuant to provisions of the Porter–Cologne Act, the RWQCBs regulate discharging waste, or proposing to discharge waste, within any region that could affect a water of the state (California Water Code Section 13260[a]). The State Water Resources Control Board (SWRCB) defines a water of the state as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code, Section 13050[e]). All waters of the United States are waters of the state. Waters of the state include wetlands, and the SWRCB definition of wetlands includes the following:

1. Natural wetlands.
2. Wetlands created by modification of a surface water of the state.
3. Artificial wetlands that meet any of the following criteria:
    a. Approved by an agency as compensatory mitigation for impacts to other waters of the state, except where the approving agency explicitly identifies the mitigation as being of limited duration.
    b. Specifically identified in a water quality control plan as a wetland or other water of the state.
    c. Resulted from historic human activity, is not subject to ongoing operation and maintenance, and has become a relatively permanent part of the natural landscape.
    d. Greater than or equal to 1 acre in size unless the artificial wetland was constructed and is currently used and maintained, primarily for one or more of the following purposes: industrial or municipal wastewater treatment or disposal; settling of sediment; detention, retention, infiltration, or treatment of stormwater runoff and other pollutants or runoff subject to regulation under a municipal, construction, or industrial permitting program; treatment of surface waters; agricultural crop irrigation or stock watering; fire suppression; industrial processing or cooling water; active surface mining – even if the site is managed for interim wetlands functions and values; log storage; treatment, storage, or distribution of recycled water; maximizing groundwater recharge (this does not include wetlands that have incidental groundwater recharge benefits); or fields flooded for rice growing.

Wetlands that may not meet all of USACE's wetland delineation criteria are considered wetland waters of the state if, "under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation" (SWRCB 2019). Additionally, aquatic resources that USACE determines to not be waters of the United States because they lack a significant nexus to a traditional navigable water or are above the OHWM limit of federal jurisdiction, may also be considered

waters of the state. If a CWA Section 404 permit is not required for a project, the RWQCB may still require a permit (waste discharge requirements) for impacts to waters of the state under the Porter–Cologne Act.

8.3 Other Applicable Organizations in California

California Native Plant Society (CNPS) Rare Plant Program. The mission of the CNPS Rare Plant Program is to develop current, accurate information on the distribution, ecology, and conservation status of California's rare and endangered plants, and to use this information to promote science-based plant conservation in California. Once a species has been identified as being of potential conservation concern it is put through an extensive review process. Once a species has gone through the review process, information on all aspects of the species (listing status, habitat, distribution, threats, etc.) is entered into the online CNPS Inventory and given a CRPR. In 2011 the CNPS officially changed the name "CNPS List" to "CRPR." The Program currently recognizes more than 1,600 plant taxa (species, subspecies, and varieties) as rare or endangered in California.

Vascular plants listed as rare or endangered by the CNPS, but which might not have designated status under state endangered species legislation, are defined by the following CRPR:

- CRPR 1A – Plants considered by the CNPS to be extinct in California.
- CRPR 1B – Plants rare, threatened, or endangered in California and elsewhere.
- CRPR 2 – Plants rare, threatened, or endangered in California, but more numerous elsewhere.
- CRPR 3 – Plants about which we need more information – a review list.
- CRPR 4 – Plants of limited distribution – a watch list.

In addition to the CRPR designations above, the CNPS adds a Threat Rank as an extension added onto the CRPR and designates the level of endangerment by a 1 to 3 ranking, with 1 being the most endangered and 3 being the least endangered. The Threat Ranks are described as follows:

- Seriously threatened in California (high degree/immediacy of threat).
- Fairly threatened in California (moderate degree/immediacy of threat).
- Not very threatened in California (low degree/immediacy of threats or no current threats known.

8.4 State of Nevada Regulations

Nevada Revised Statutes (NRS), Nevada Administrative Codes (NAC), and other policies provide protection and conservation management of species, such as NRS chapters 501 through 506 and NAC Chapters 501 through 506.

- NRS 503.584 provides for the creation of a list of threatened, endangered, and protected species, and requires permits for take of these species.
- NRS 503.610 affirms in state law the protections provided under the federal BGEPA for bald and golden eagles, including their parts, eggs, and nests, and provides for permits to address nuisance eagles consistent with federal law.
- NRS 503.620 affirms in state law the protections provided under the federal MBTA for migratory birds, including their parts, eggs, and nests.
- NAC 503.050 defines all birds protected under the MBTA and BGEPA as protected in Nevada and lists endangered bird species.
- NAC 503.055 specifies introduced species of birds that are not protected under state law in Nevada.

Nevada Revised Statutes, Title 40, Chapter 445A establishes the framework for water pollution control. The Nevada Division of Environmental Protection (NDEP) jurisdiction for permitting, monitoring, and enforcement actions intended to prevent the discharge of pollutants that could adversely affect biological resources. The NDEP is responsible for issuing permits related to discharges of pollutants to surface waters consistent with Section 401 of the CWA where "waters of the U.S." are present, and for issuing Water Pollution Control permits consistent with the Nevada Water Pollution Control Law.

8.5 Local Regulations and Plans

Clark County Multiple Species Habitat Conservation Plan. The Clark County Multiple Species Habitat Conservation Plan (MSHCP) is a regional, landscape-scale conservation program that provides long-term protection for covered species and habitats across much of southern Nevada, including extensive areas of BLM–administered public land. The MSHCP applies to federal actions on BLM lands through coordination and consistency review conducted as part of the NEPA process, with an emphasis on avoiding and minimizing impacts to covered species such as the federally threatened desert tortoise (*Gopherus agassizii*) and the western burrowing owl (*Athene cunicularia hypugaea*). Within the southern Nevada plan area, BLM special management designations conservation easements associated with the McCullough Mountains, which are managed to protect high-value biological resources, habitat connectivity, and sensitive desert species. BLM environmental review process evaluates proposed projects to ensure consistency with the MSHCP and applicable land use plans, and to confirm that construction, operation, and maintenance activities incorporate appropriate conservation measures and do not adversely affect sensitive habitats or designated conservation lands.

San Bernardino County Countywide Plan and County Policy Plan. The Countywide Plan is a collection of planning tools intended to guide future decisions, investments, and improvements throughout San Bernardino County. The County Policy Plan, one of three components of the Countywide Plan, is a legal document, adopted by County Ordinance, and serves as the County's General Plan for unincorporated areas. The Natural Resources Element of the County Policy Plan establishes goals and policies to ensure that San Bernardino County protects and preserves its biological resources. The biological resource's goal and policies relevant to the proposed project include the following (County of San Bernardino, 2020):

- Goal NR-5: Biological Resources. An interconnected landscape of open spaces and habitat areas that promotes biodiversity and healthy ecosystems, both for their intrinsic value and for the value placed on them by residents and visitors.
- Policy NR-5.1: Coordinated habitat planning. We participate in landscape-scale habitat conservation planning and coordinate with existing or proposed habitat conservation and natural resource management plans for private and public lands to increase certainty for both the conservation of species, habitats, wildlife corridors, and other important biological resources and functions; and for land development and infrastructure permitting.
- Policy NR-5.2: Capacity for resource protection and management. We coordinate with public and non-governmental agencies to seek funding and other resources to protect, restore, and maintain open space, habitat, and wildlife corridors for threatened, endangered, and other sensitive species.
- Policy NR-5.3: Multiple-resource benefits. We prioritize conservation actions that demonstrate multiple resource preservation benefits, such as biology, climate change adaptation and resiliency, hydrology, cultural, scenic, and community character.
- Policy NR-5.4: Off-base recovery efforts. We coordinate with military installations to facilitate off-base recovery of threatened and endangered species and landscape-scale conservation.

- Policy NR-5.5: Mitigation and future responsibilities. We require that new development satisfy habitat conservation responsibilities without shifting conservation responsibilities onto military property.
- Policy NR-5.6: Mitigation banking. We support the proactive assemblage of lands to protect biological resources and facilitate development through private or public mitigation banking. We require public and private conservation lands or mitigation banks to ensure that easement and fee title agreements provide funding methods sufficient to manage the land in perpetuity.
- Policy NR-5.7: Development review, entitlement, and mitigation. We comply with state and federal regulations regarding protected species of animals and vegetation through the development review, entitlement, and environmental clearance processes.
- Policy NR-5.8: Invasive species. We require the use of non-invasive plant species with new development and encourage the management of existing invasive plant species that degrade ecological function.

The Policy Plan provides the basis for and is implemented by San Bernardino County's Development Code (County of San Bernardino 2007). San Bernardino County Development Code Chapter 88.01, Plant Protection and Management, provides regulations and guidelines for the management of plant resources in the unincorporated areas of the County, and includes the following relevant sections.

Section 88.01.060 Desert Native Plant Protection. Chapter 88.01.060, Desert Native Plant Protection, of the San Bernardino County Development Code provides regulations for the removal or harvesting of specified native desert plants to preserve and protect the plants and to provide for the conservation and wise use of desert resources. The following desert native plants or any part of them, except the fruit, shall not be removed except under a Tree or Plant Removal Permit in compliance with Section 88.01.050 (Tree or Plant Removal Permits):

1. The following desert native plants 6 feet or greater in height or with stems 2 inches or greater in diameter:
   a. Smoke tree (*Psorothamnus spinosus* [Synonym: *Dalea spinosa*])
   b. All species of the genus Prosopis (mesquites)
2. All species of the family Agavaceae (century plants, nolinas, yuccas)
3. Creosote rings, 10 feet or greater in diameter
4. All western Joshua trees
5. Any part of the following species, whether living or dead:
   a. *Olneya tesota* (desert ironwood)
   b. All species of the genus Prosopis (mesquites)
   c. All species of the genera *Cercidium* (palos verdes)

Section 88.01.080 Riparian Plant Conservation. Chapter 88.01.080, Riparian Plant Conservation, of the San Bernardino County Development Code provides regulations to promote healthy and abundant riparian habitats that protect watersheds; control trans-mission and storage of natural water supplies; provide unique wildlife habitats for rare, endangered and threatened plants and animals; provide attractive environments; control natural soil erosion and sedimentation to protect stream banks subject to erosion and undercutting; and provide sufficient shade to reduce temperature and evaporation and the growth of algae in streams. The removal of vegetation within 200 feet of the bank of a stream, or in an area indicated as a protected riparian area on an overlay map or Specific Plan, shall require approval of a Tree or Plant Removal Permit in compliance with Section 88.01.050 (Tree or Plant Removal Permits) and shall be subject to environmental review.

City of Victorville General Plan 2030. The City's Resource Element is intended to function as a guide to the protection, use and maintenance of the City's natural and cultural resources, including biological resources (City of Victorville, 2008). Goal #4 (Conservation of Important Habitat) contains the following goals and policies to preserve land containing native habitat that sustains rare, threatened, or endangered plants and wildlife species (City of Victorville, 2008).

- Objective 4.1. Preservation of natural communities that support rare, threatened, and/or endangered plant and wildlife species throughout the Planning Area.
- Policy 4.1.1. Encourage natural habitat that supports rare, threatened, or endangered plants and wildlife (i.e., "sensitive" species), or require restoration of the same type of impacted habitat within an existing, planned, or potential conservation area.
- Objective 4.2. Permanent Conservation of Mojave River Corridor Ecological Values.
- Policy 4.2.1. Generally, prohibit private or public development projects or major infrastructure facilities on land within the Mojave River Corridor, where biological surveys have determined there is habitat that supports rare, threatened, and/or endangered plants or wildlife. Allow minor encroachments into such habitat for critical public facilities and recreational trails, where reliable assurances are provided that no loss of sensitive species would occur.

City of Victorville Municipal Code. Chapter 13.33, Preservation and Removal of Joshua Trees, of the City of Victorville Municipal Code provides protections for western Joshua tree to protect and preserve, to the greatest extent possible, Joshua trees in all areas of the City to preserve the unique natural desert environment throughout the City and for the health, safety, and welfare of the community (Victorville Municipal Code 13.33.010). Section 13.33.040 of the Victorville Municipal Code prohibits any person to cut, damage, destroy, dig up, or harvest any Joshua tree without the prior written consent of the Director of Parks and Recreation or their designee. Furthermore, Section 16-5.02.060 of the Victorville Municipal Code states the following regarding western Joshua trees and as a requirement of the grading and permit requirements of Article 2, Grading Regulations Victorville Municipal Code:

> All Joshua trees, as per Chapter 13.33 of the Victorville Municipal Code, shall be indicated by showing the exact center of its trunk as established by a licensed surveyor. Its tag number, trunk diameter and height must be indicated. The health and proposed disposition of the tree must be indicated. Where a tree or trees are to be removed, the applicant shall meet all current requirements and standards as set forth by the CDFW, and proof shall be submitted to the Building Department prior to issuance of a permit. Alternatively, the Applicant may provide a detailed report, from a licensed Arborist or Biologist, for protecting and preserving the tree or trees in accordance with applicable CDFW standards, which may be affected by the proposed grading.

Town of Apple Valley Multi-Species Conservation Plan MSHCP/NCCP. An ongoing planning effort is underway to develop the Town of Apple Valley Multiple Species Habitat Conservation Plan (MSHCP) and Natural Community Conservation Plan (NCCP). A 2017 Planning Agreement between the Town of Apple Valley, CDFW, and USFWS identified the geographic scope of the planning area, which included the Town of Apple Valley, its Sphere of Influence, and unincorporated lands within the County of San Bernardino to the north and east of the Town of Apple Valley, covering a total of approximately 221,180 acres within the western Mojave Desert. The 2017 Planning Agreement also preliminary identified conservation objectives for the planning area, covered activities, and covered species (Town of Apple Valley, 2017). Currently, a draft MSHCP/NCCP has not been prepared, and conservation strategies have not been identified.

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Attachment A

Figures

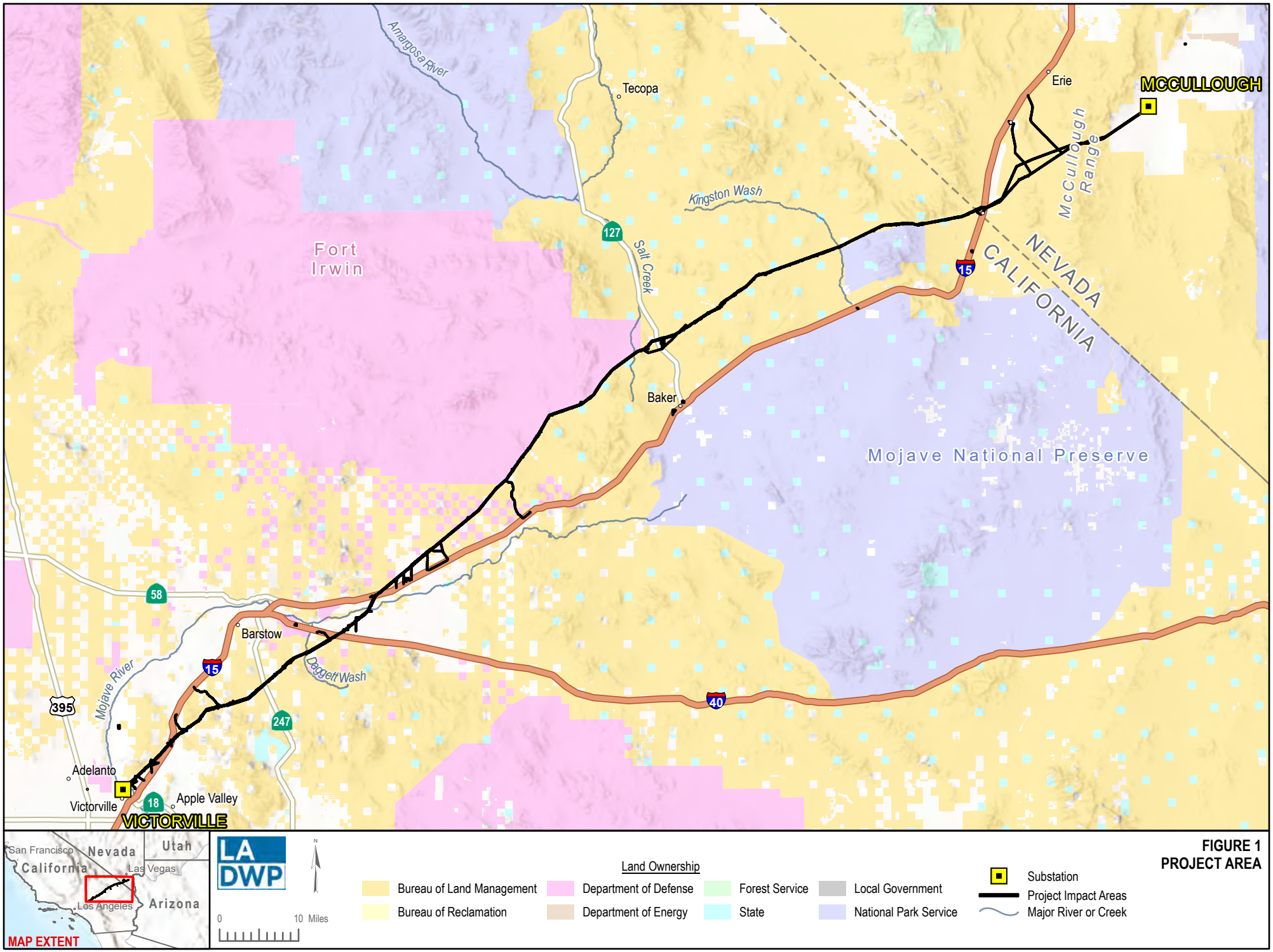

FIGURE 1
PROJECT AREA

Data Sources: LADWP, 2026; Aspen, 2026; BLM, 2026; Esri, 2026. Spatial Reference: NAD 1983 UTM Zone 11N Date Exported: 6/10/2026
This product reflects geospatial analysis only and is not a substitute for authoritative boundary determinations.

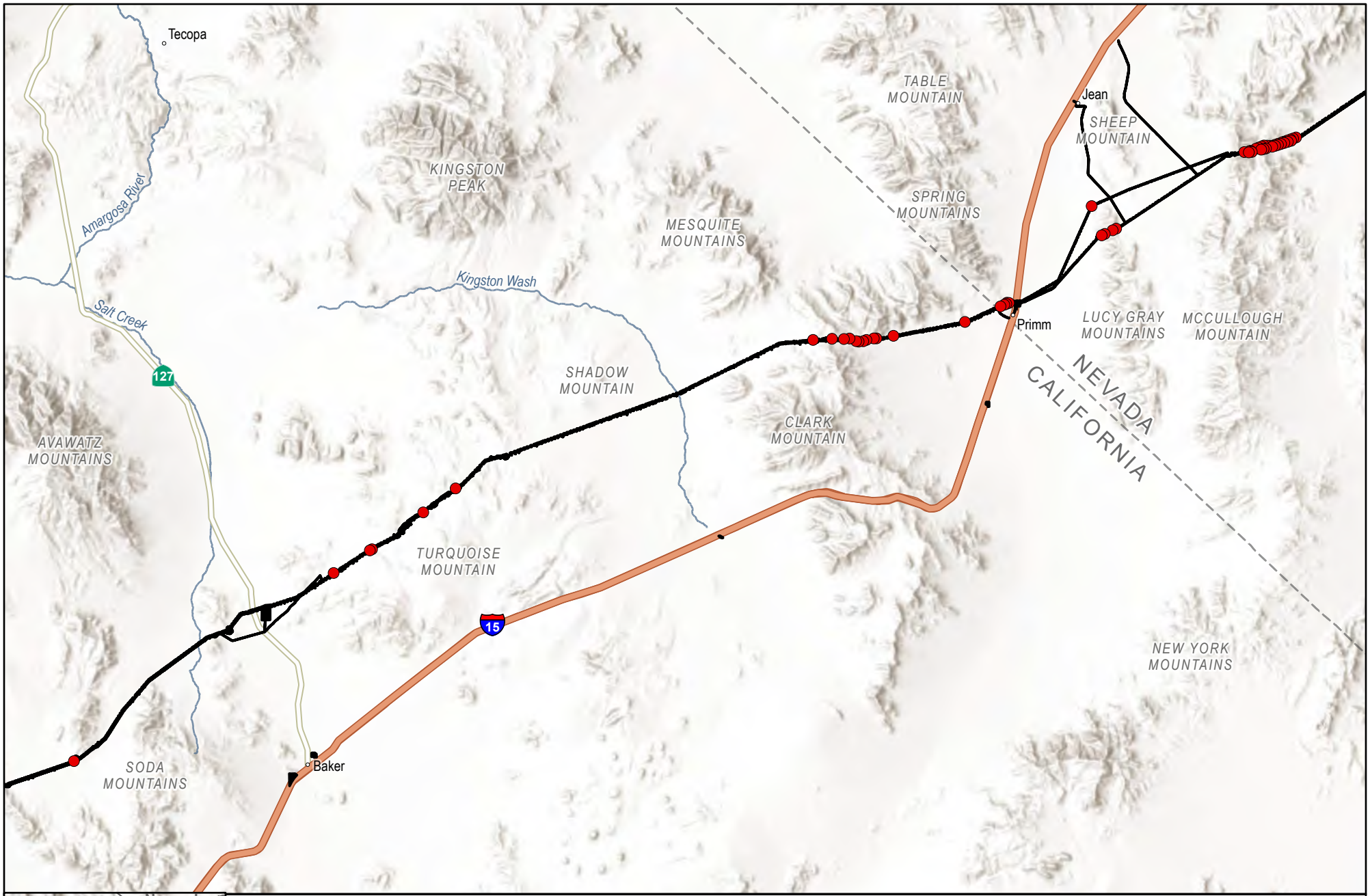

FIGURE 2
LOCATIONS OF CONTROLLED DETONATIONS

Data Sources: LADWP, 2026; Aspen, 2026; Esri, 2026. Spatial Reference: NAD 1983 UTM Zone 11N Date Exported: 6/10/2026
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FIGURE 3
PERMANENT AND TEMPORARY IMPACT AREAS

Data Sources: LADWP, 2026; Aspen, 2026; Esri, 2026. Spatial Reference: NAD 1983 UTM Zone 11N Date Exported: 6/10/2026
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PERMANENT AND TEMPORARY IMPACT AREAS

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LA DWP

N

Temporary Impact

0 500 Feet

FIGURE 3
PERMANENT AND TEMPORARY IMPACT AREAS

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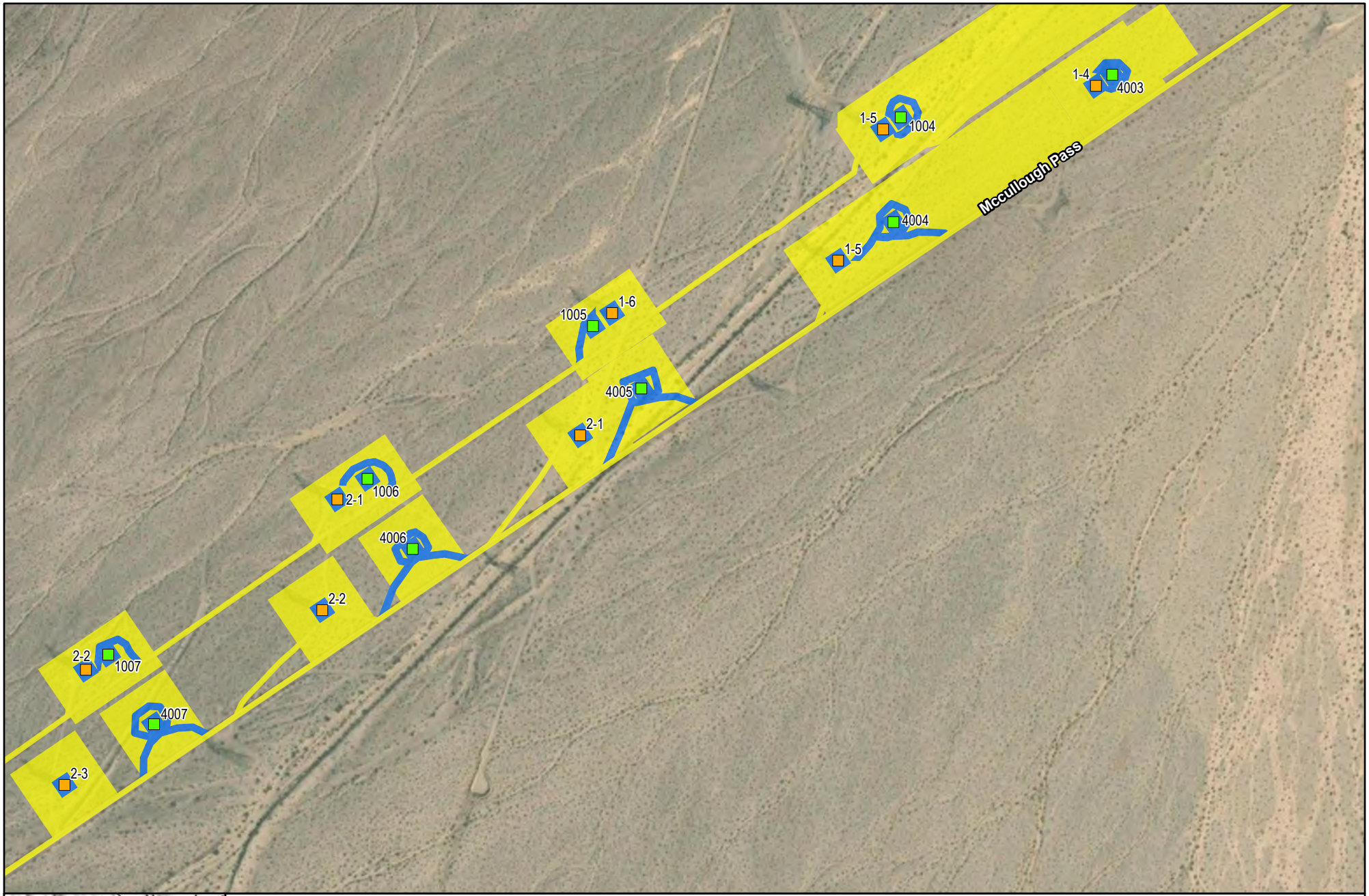

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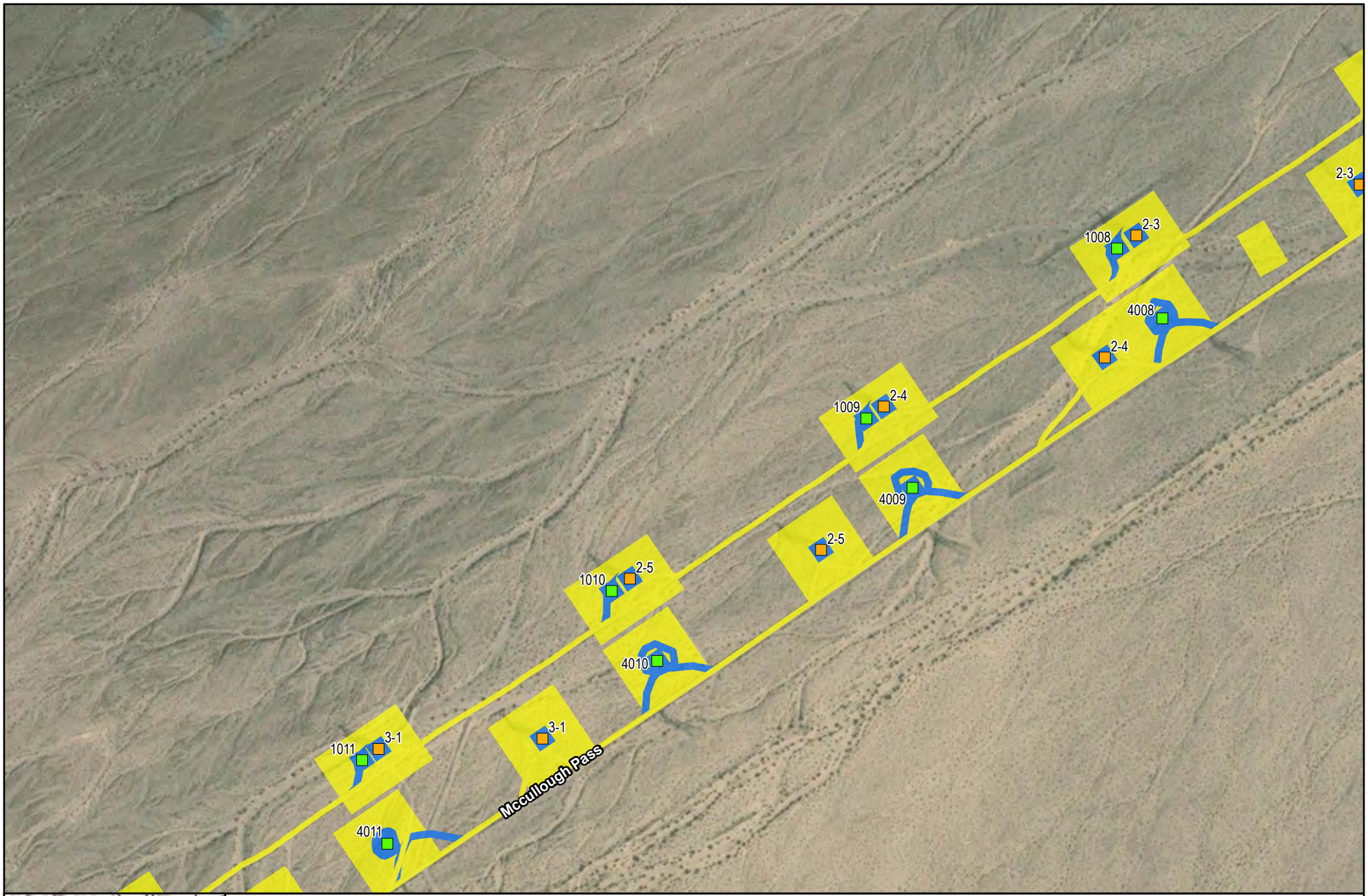

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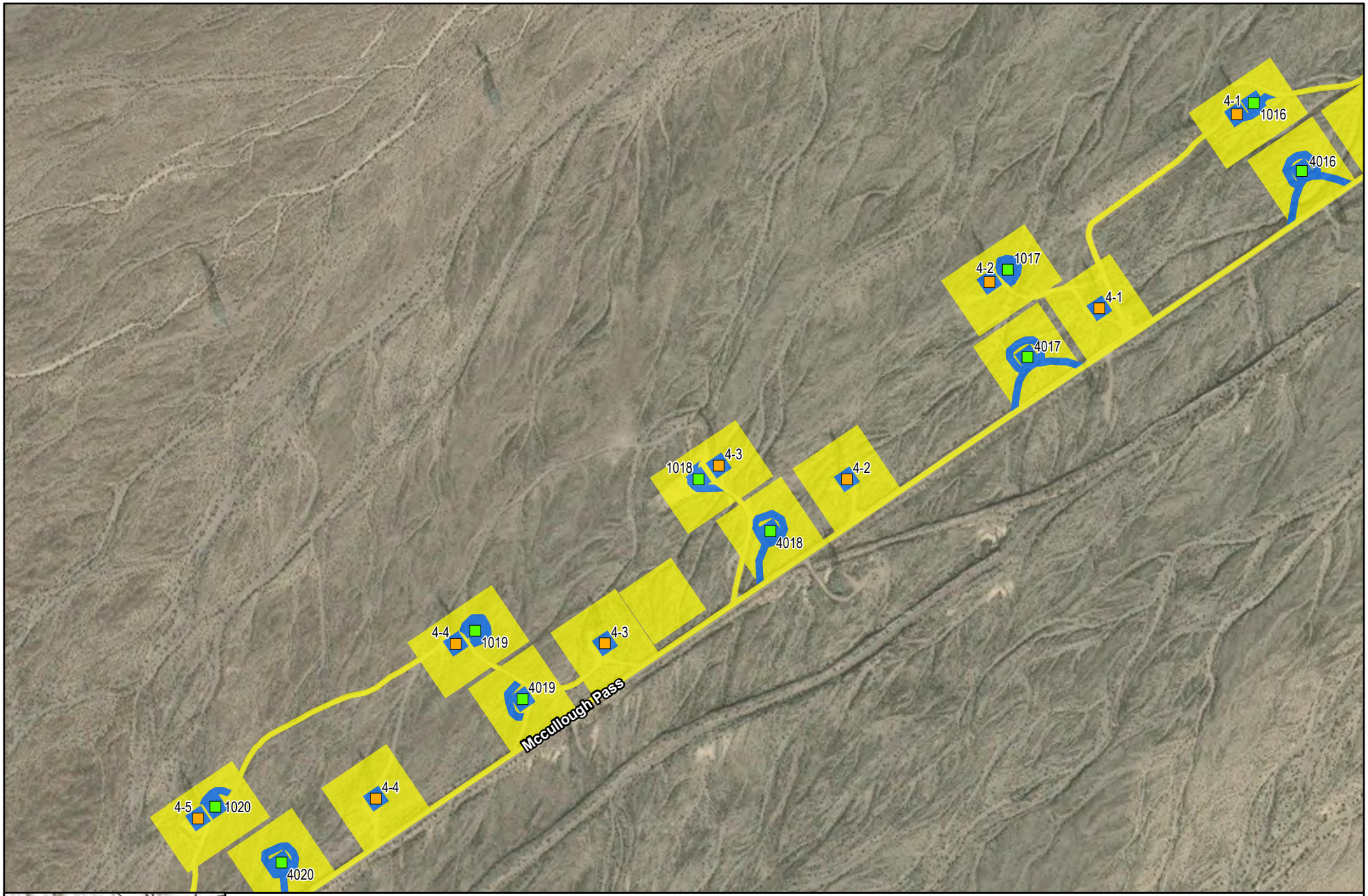

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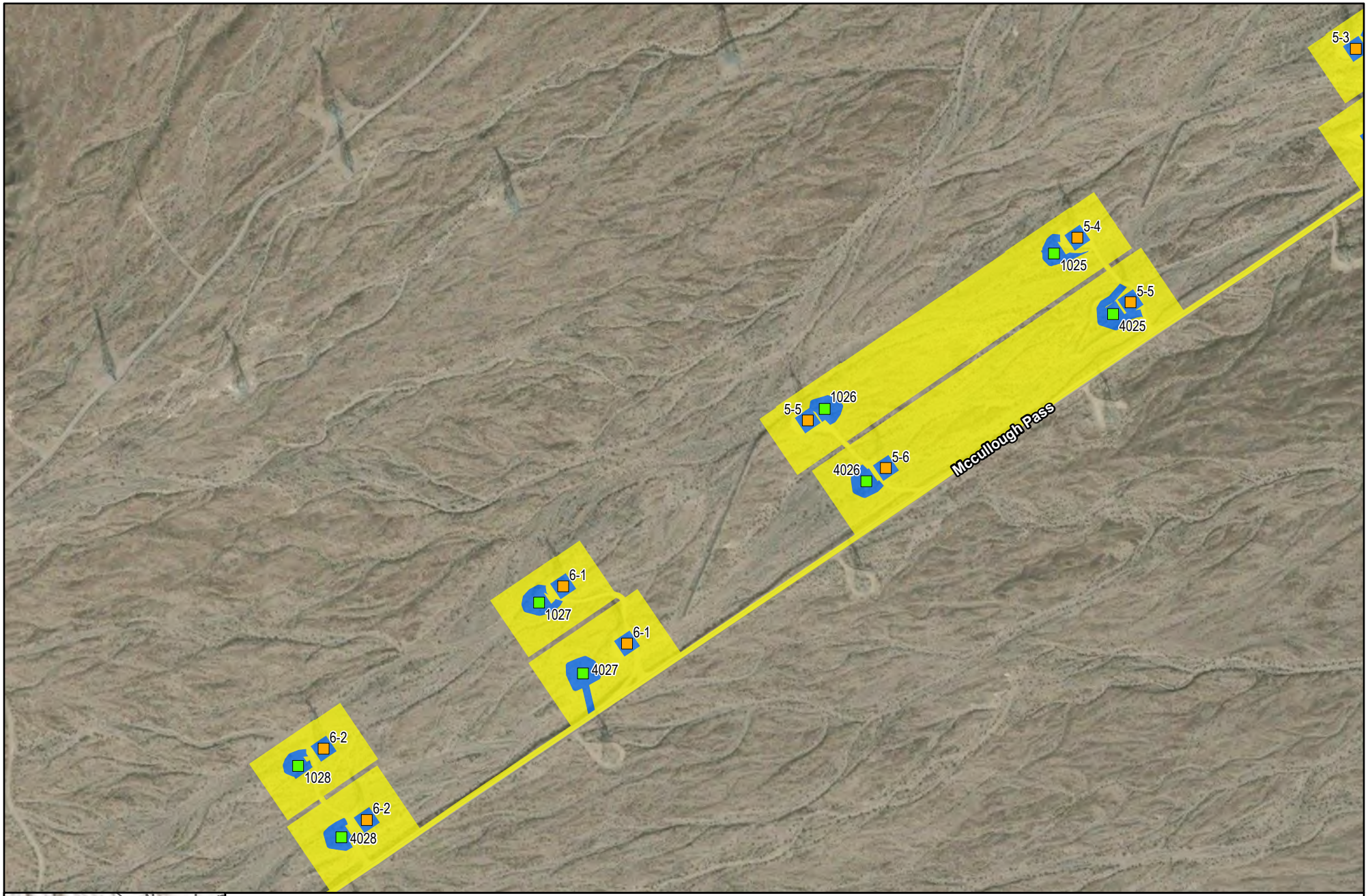

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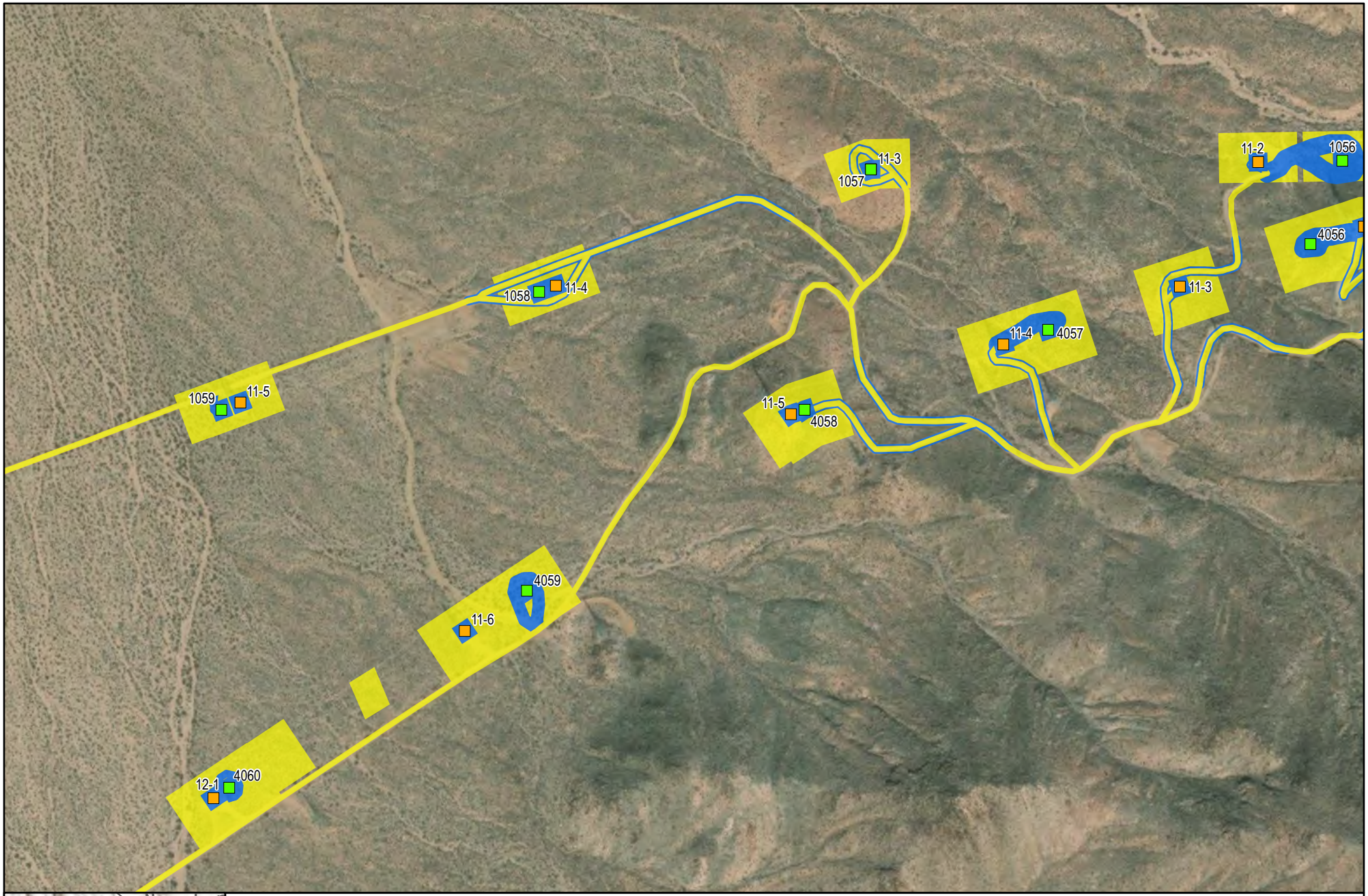

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LA DWP

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Temporary Impact

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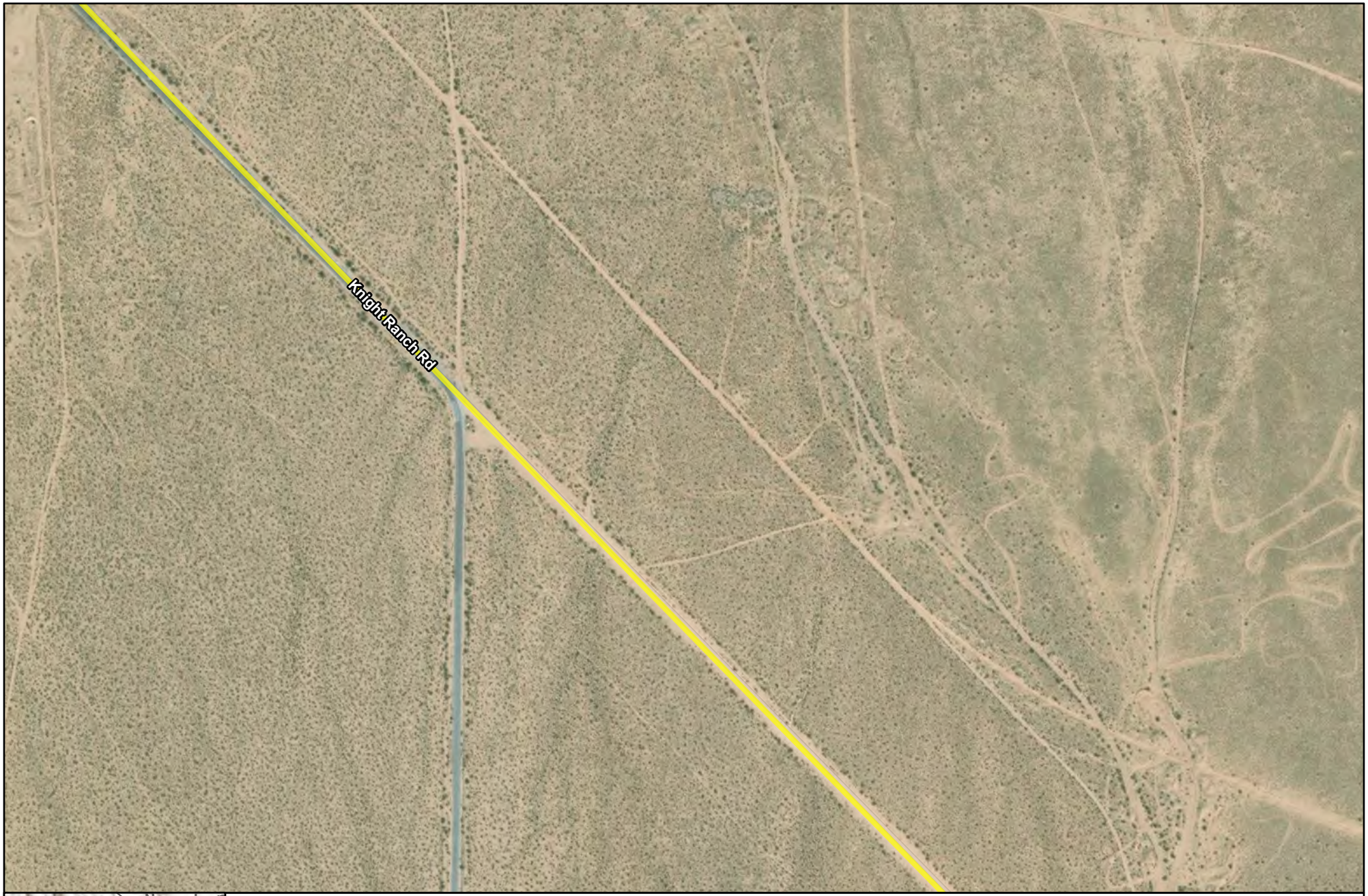

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LA DWP

N

0 500 Feet

Temporary Impact

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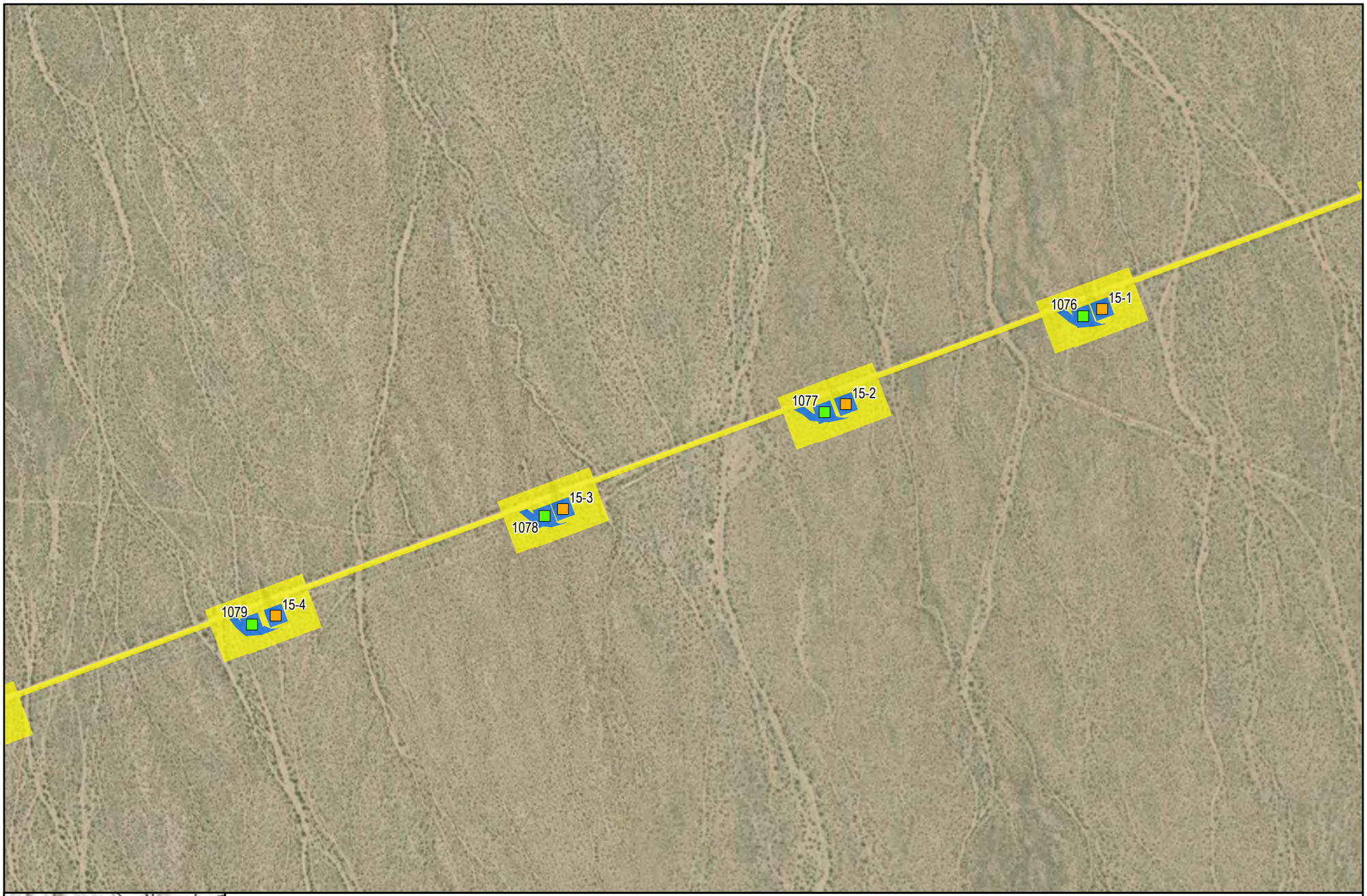

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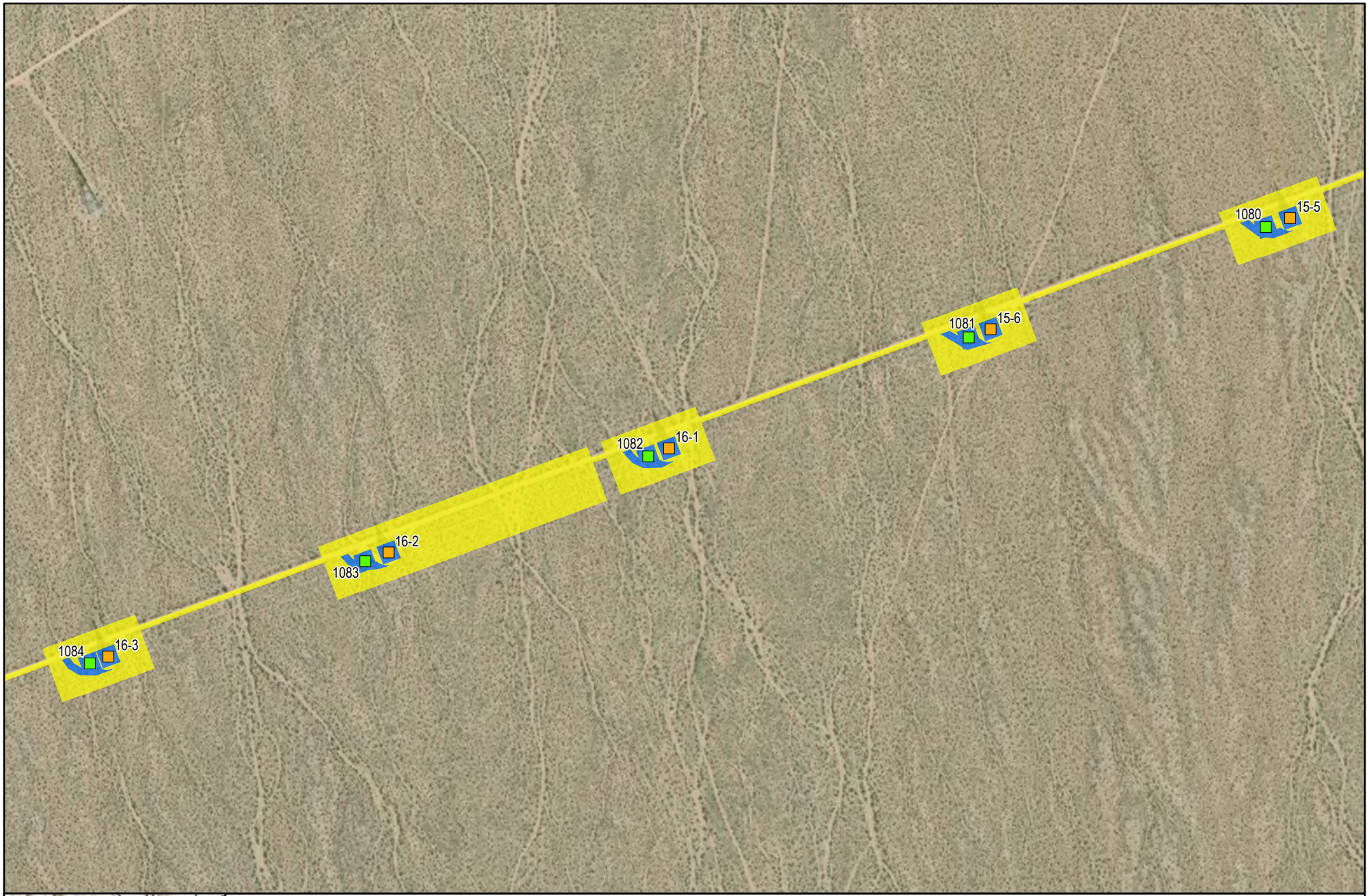

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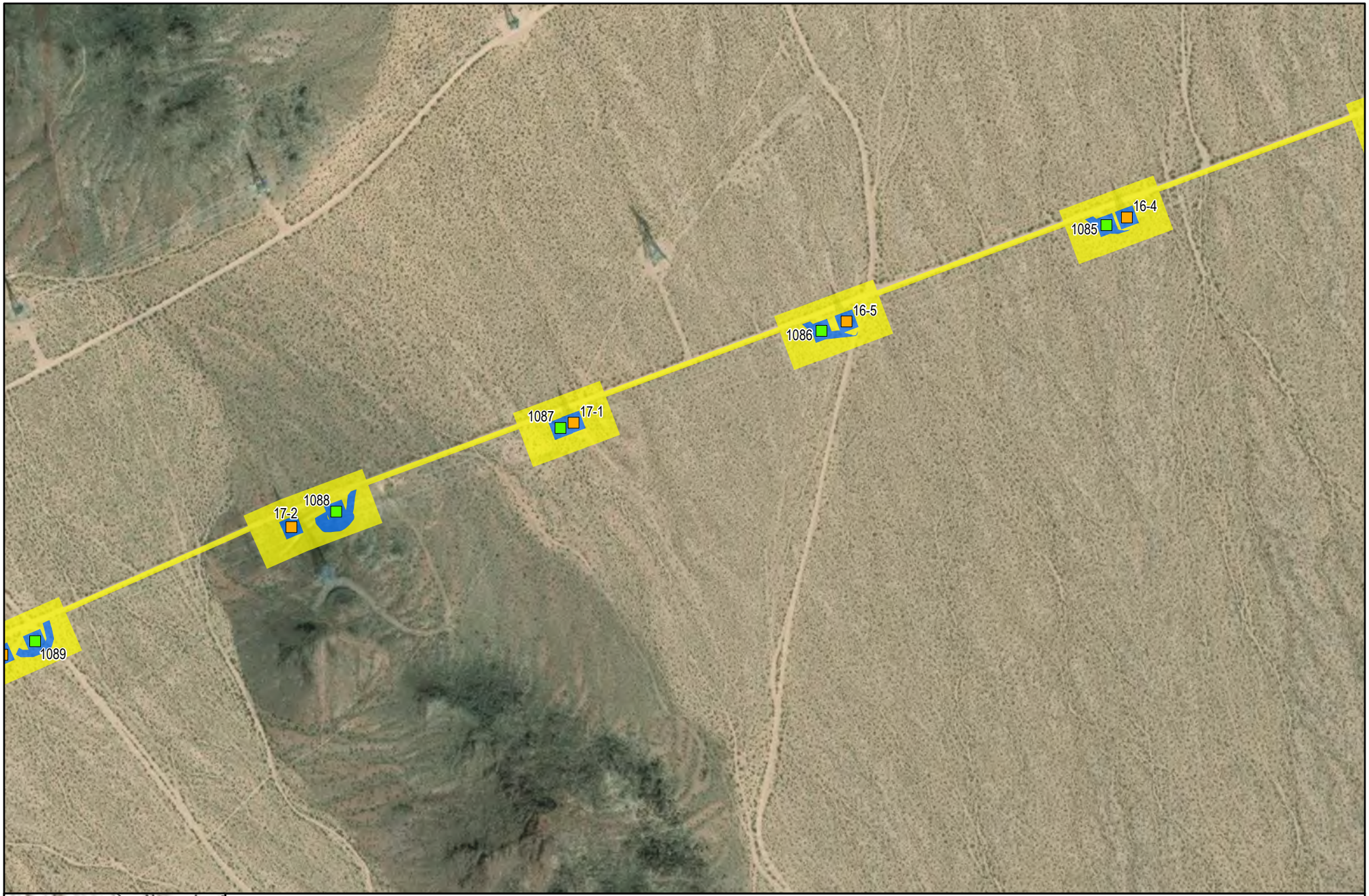

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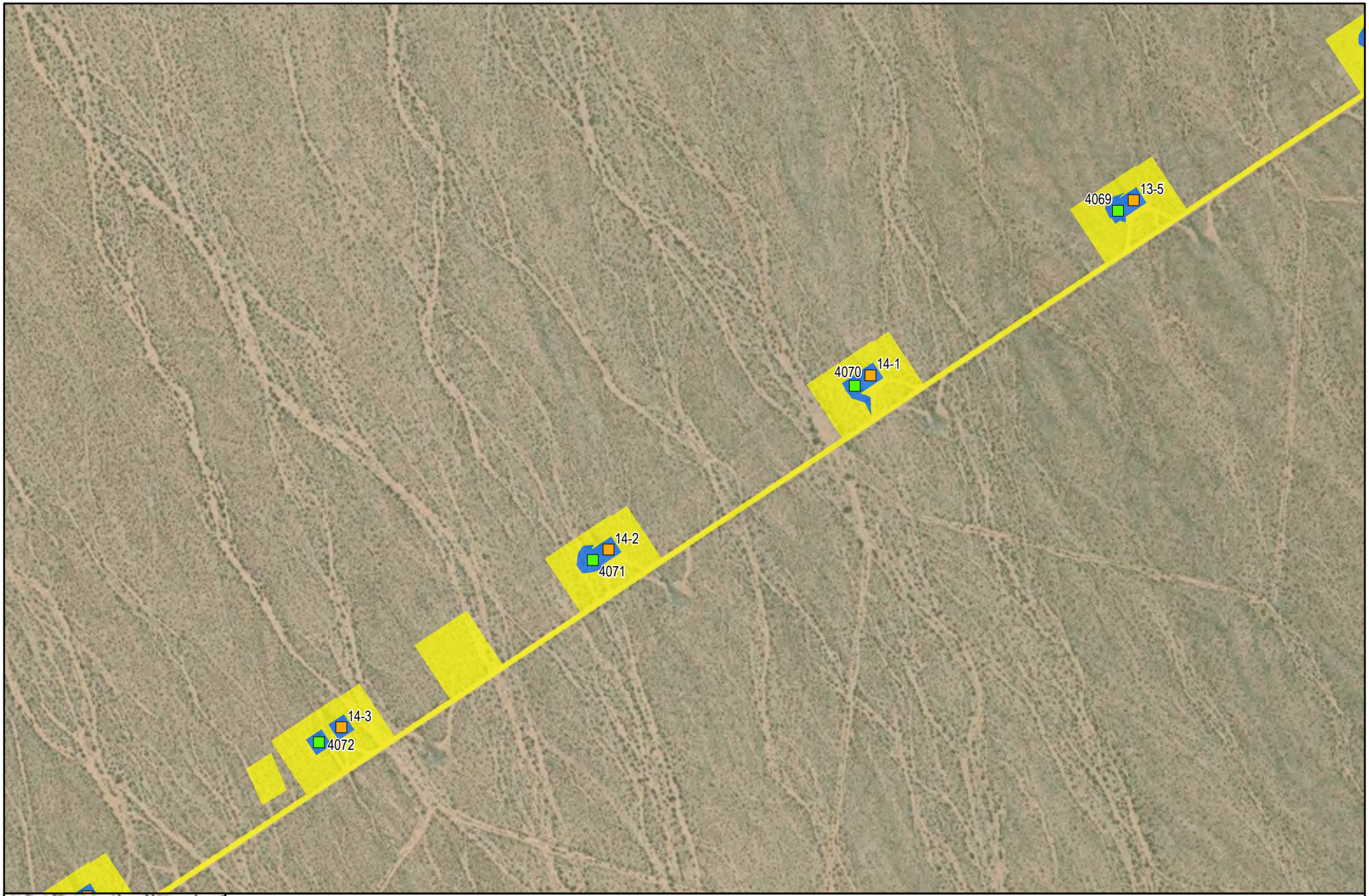

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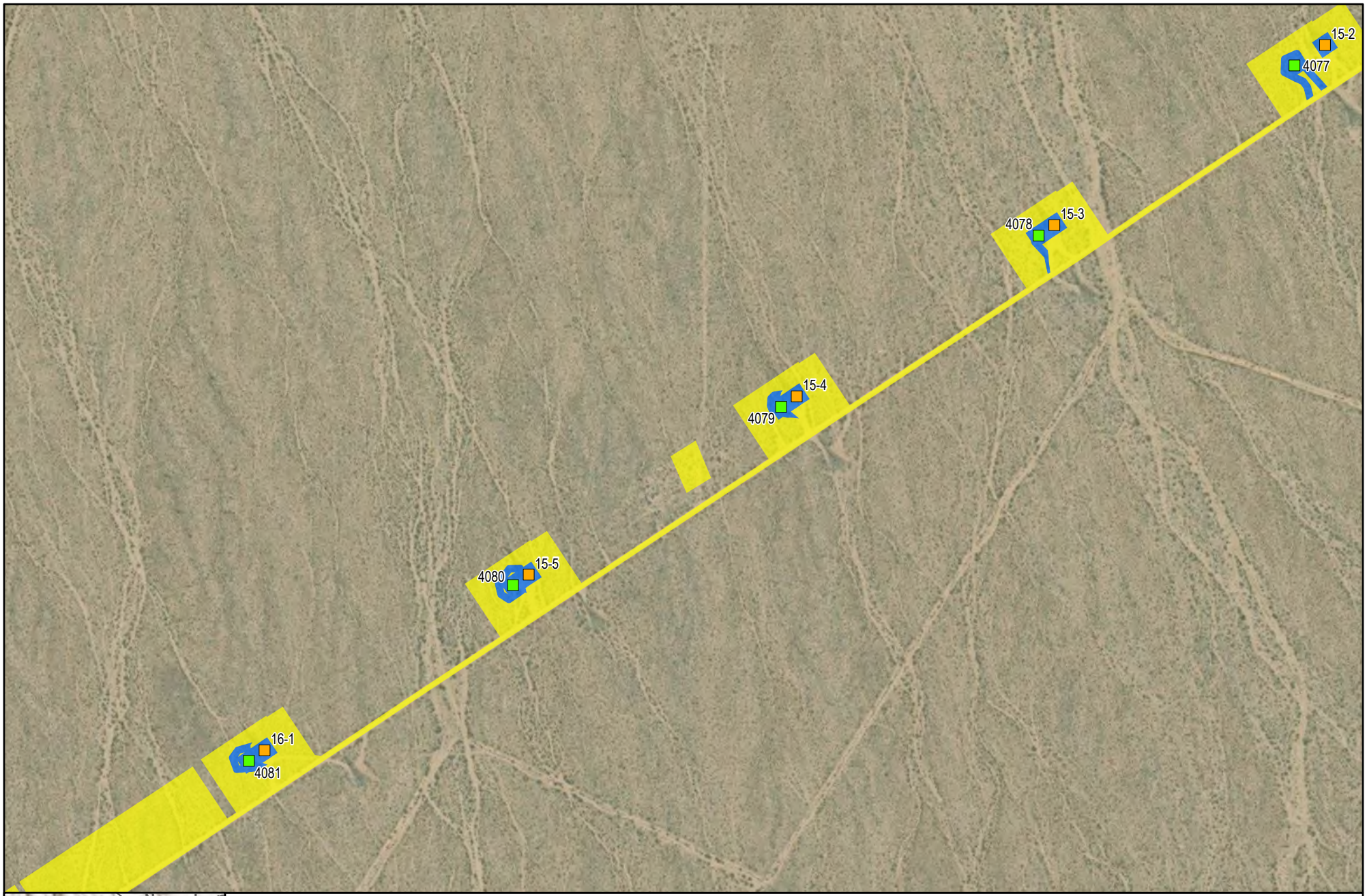

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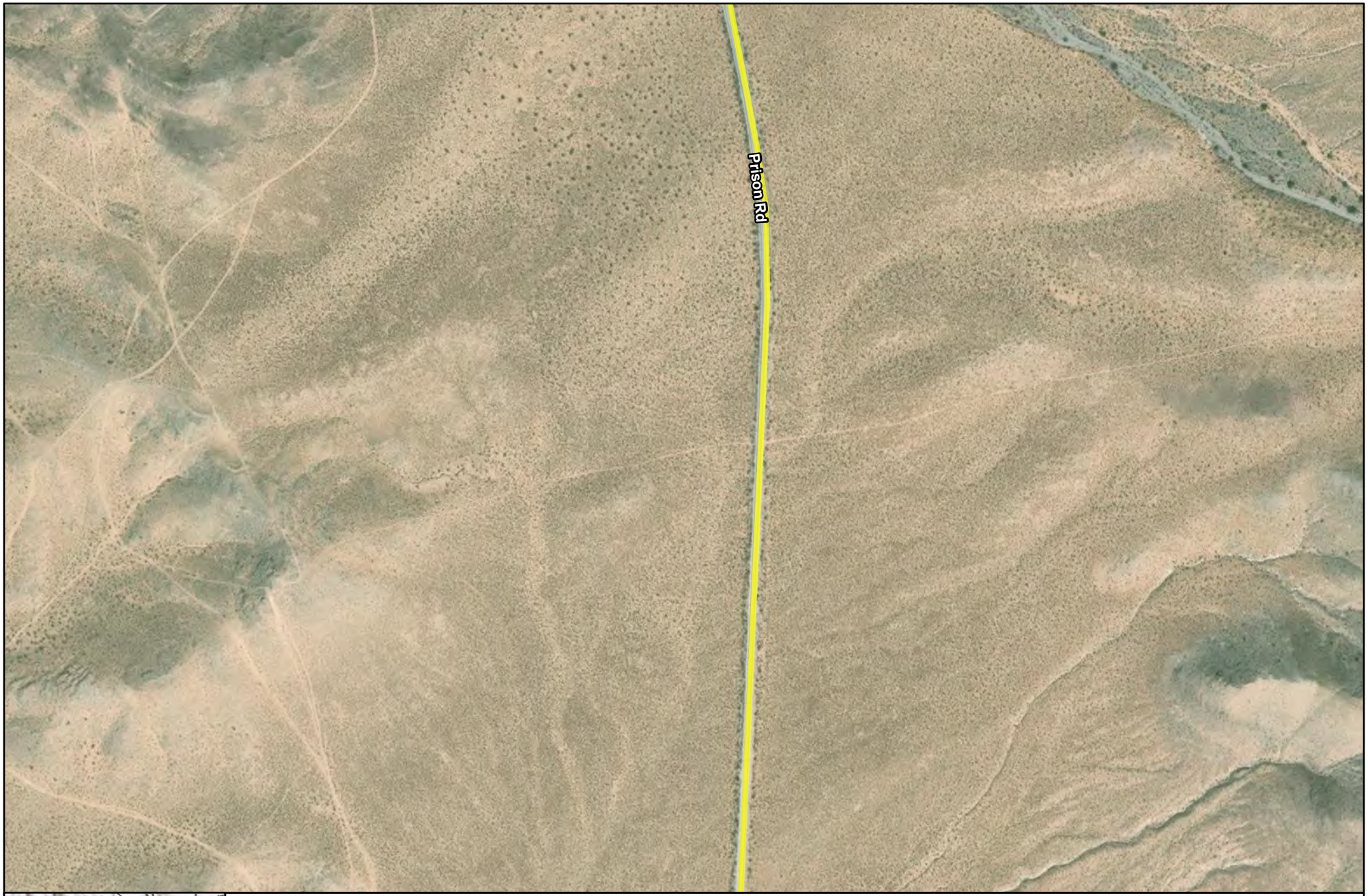

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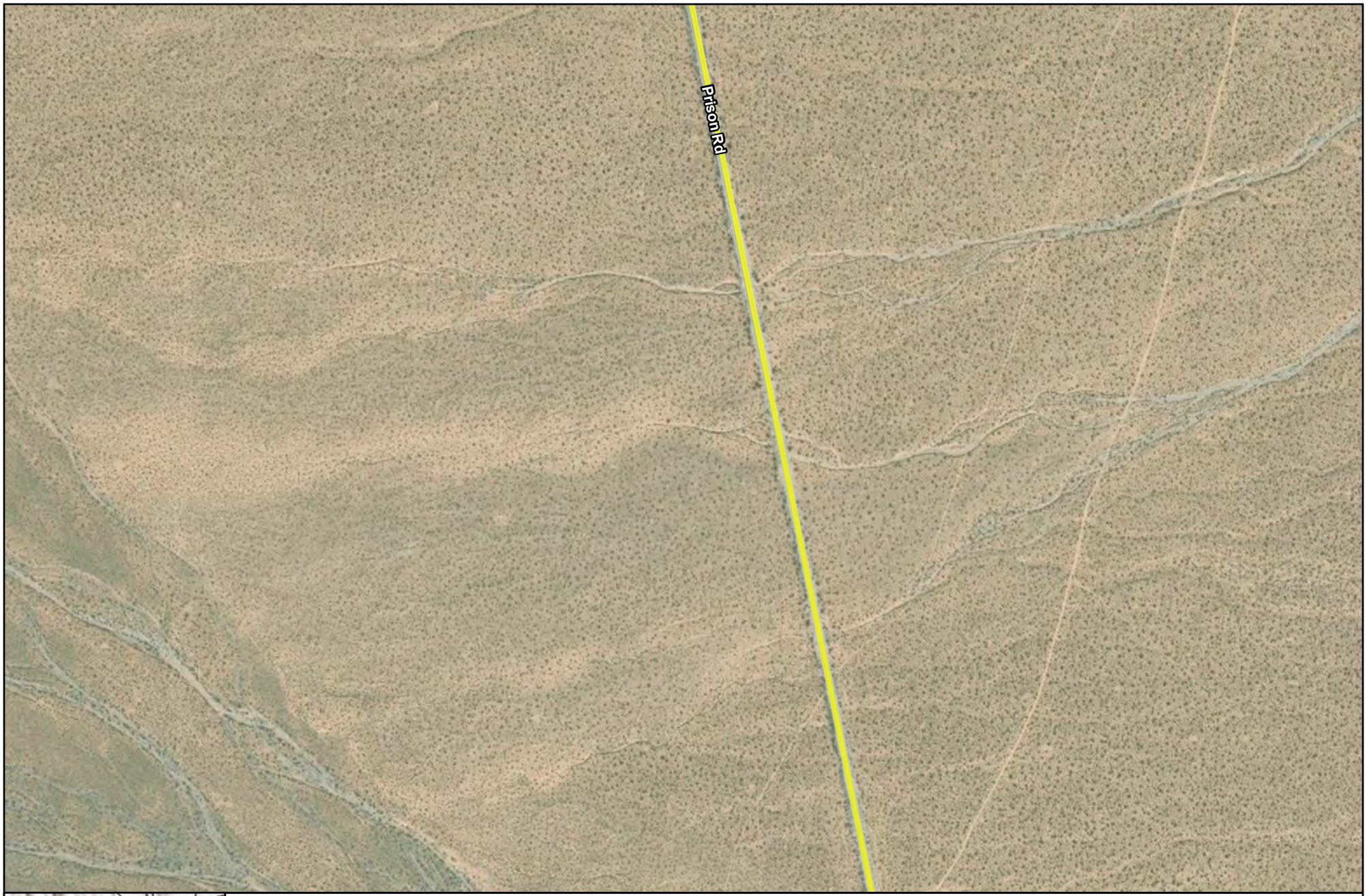

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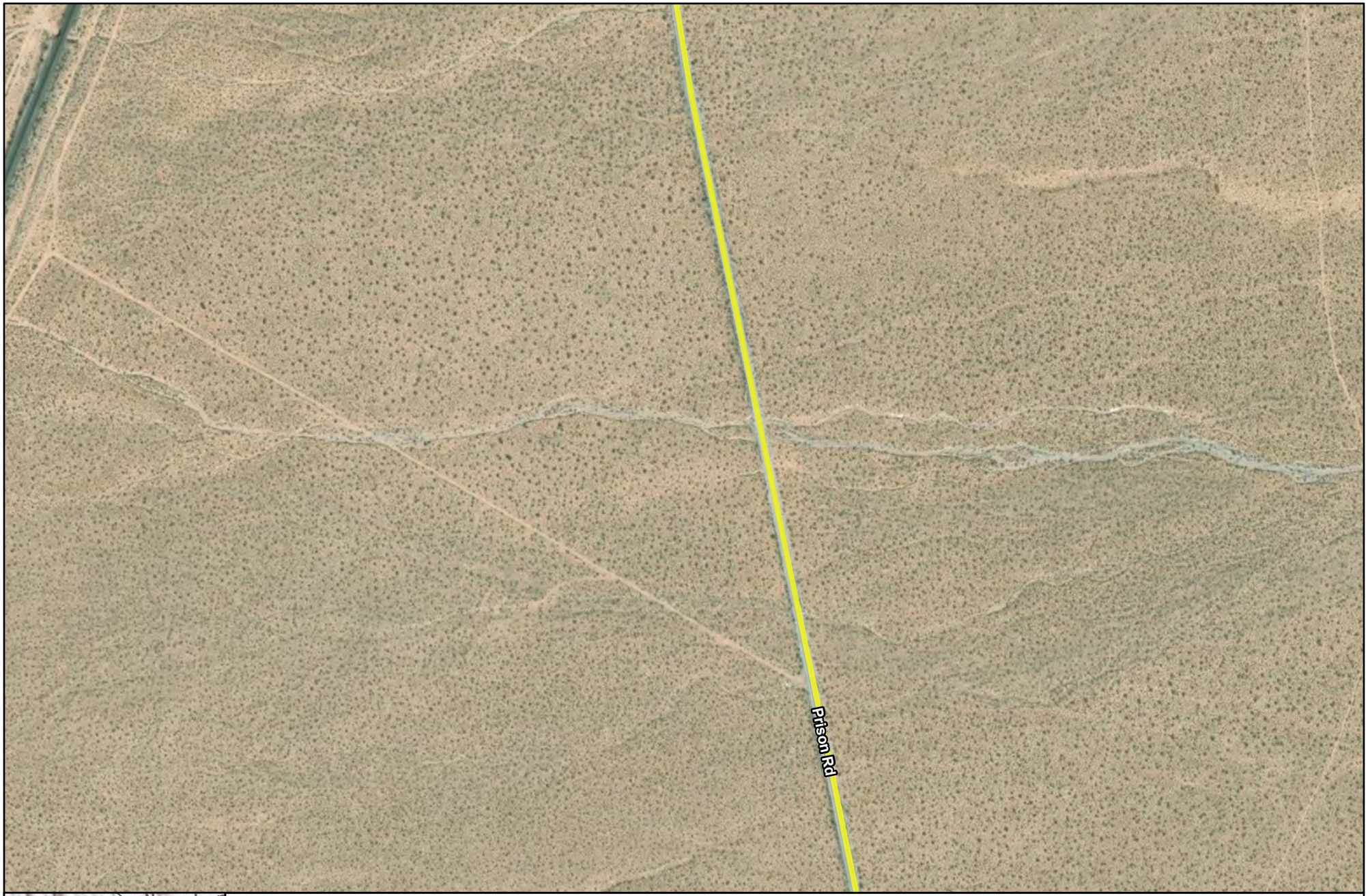

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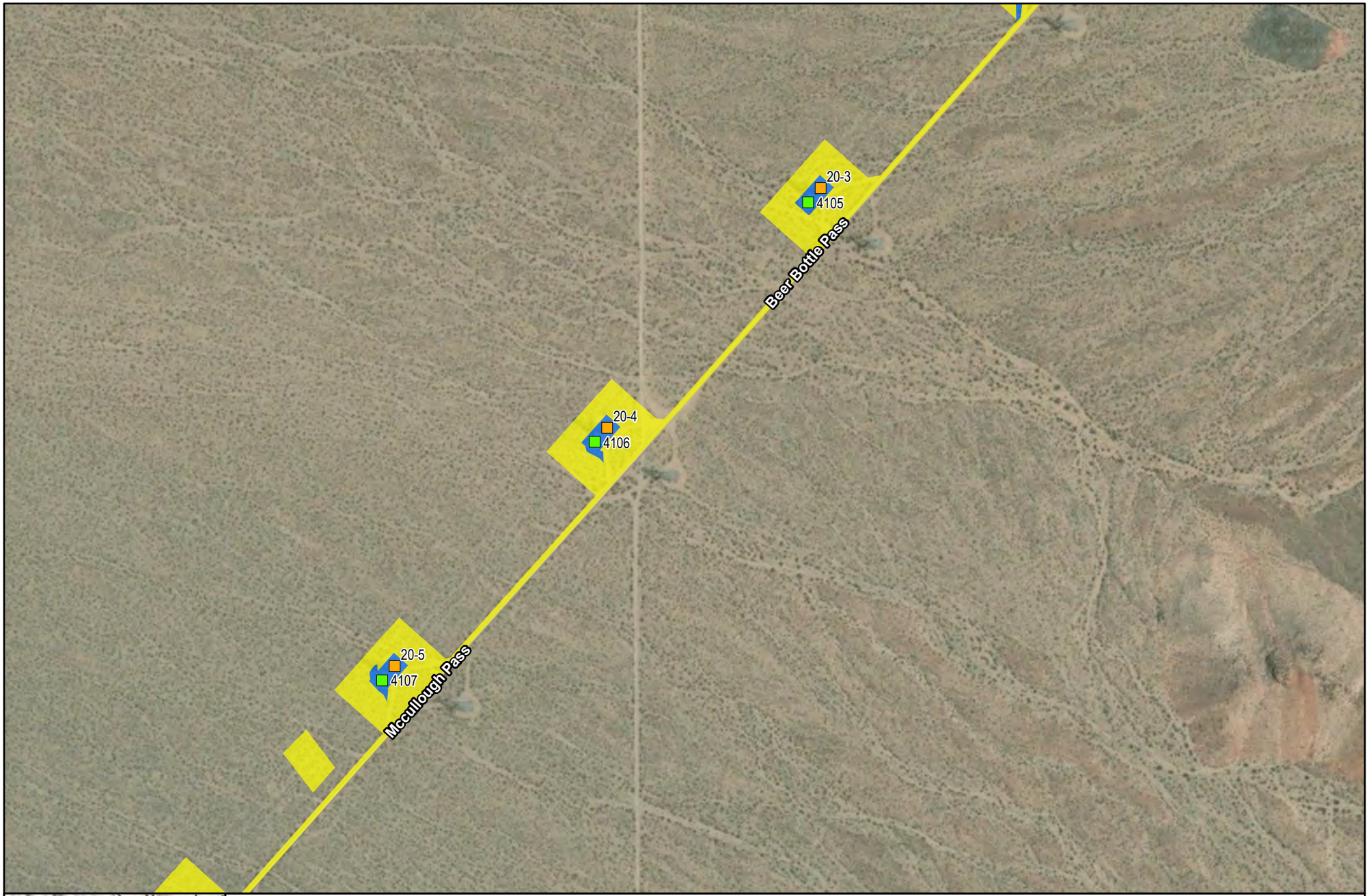

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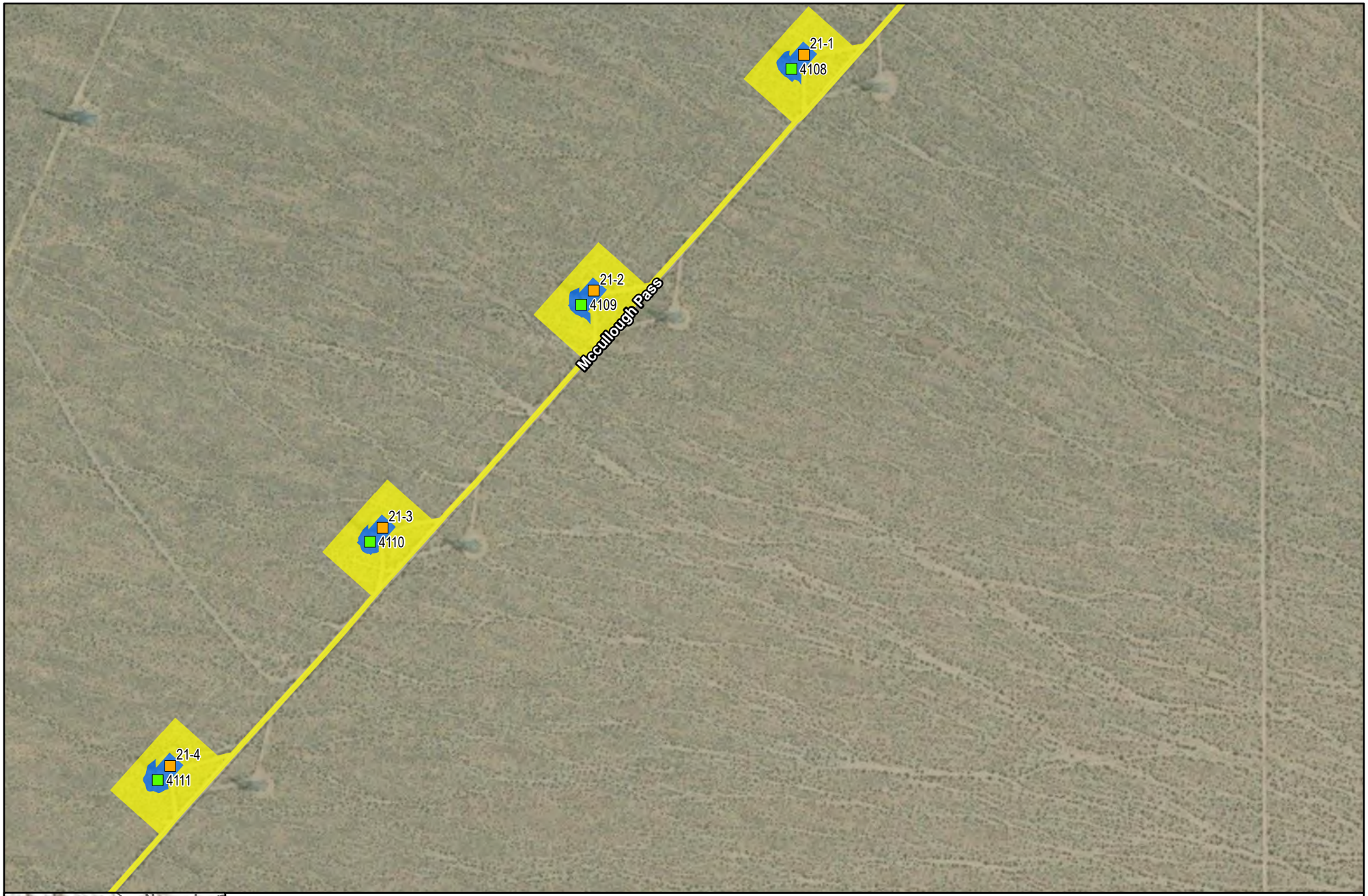

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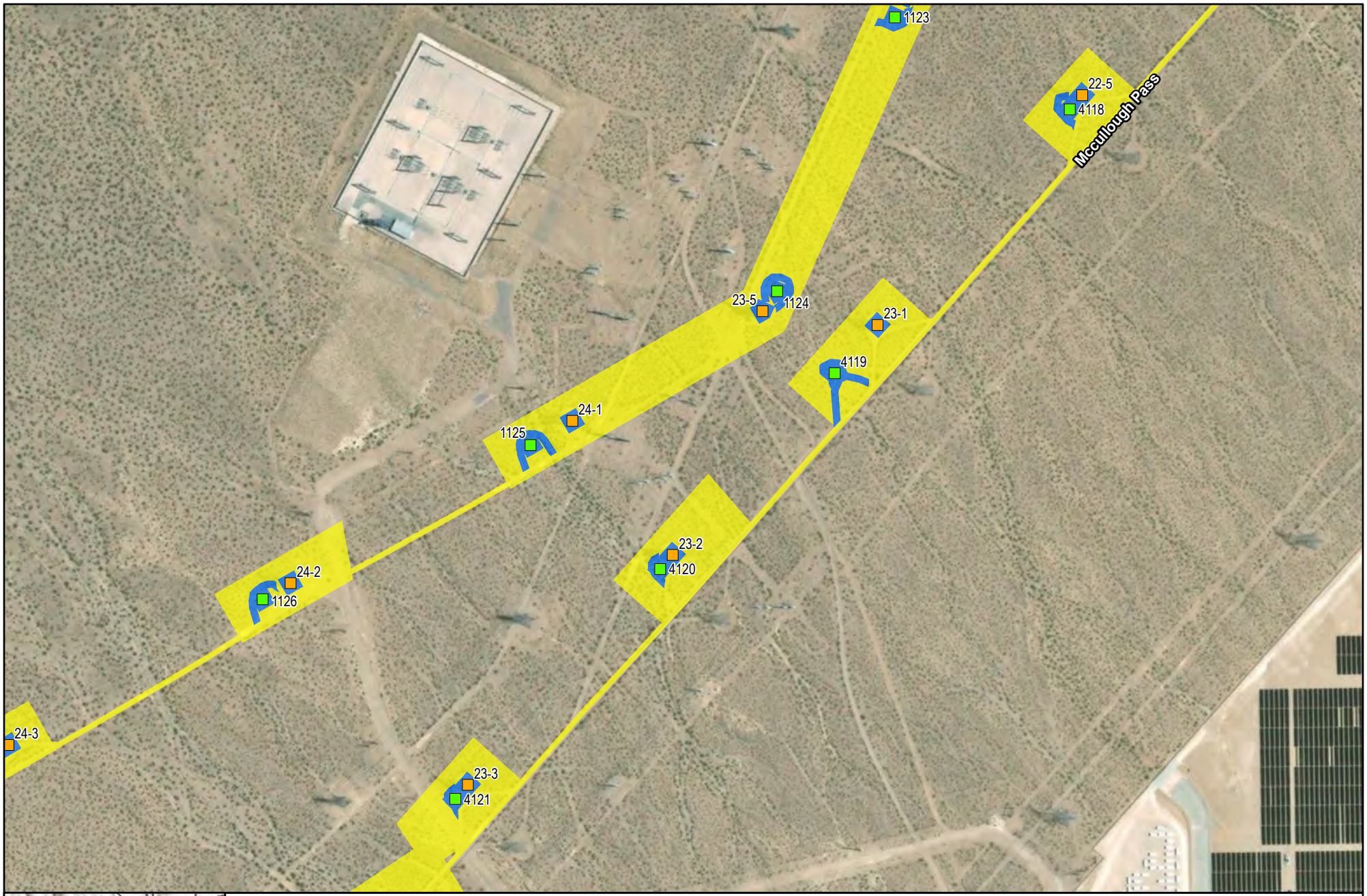

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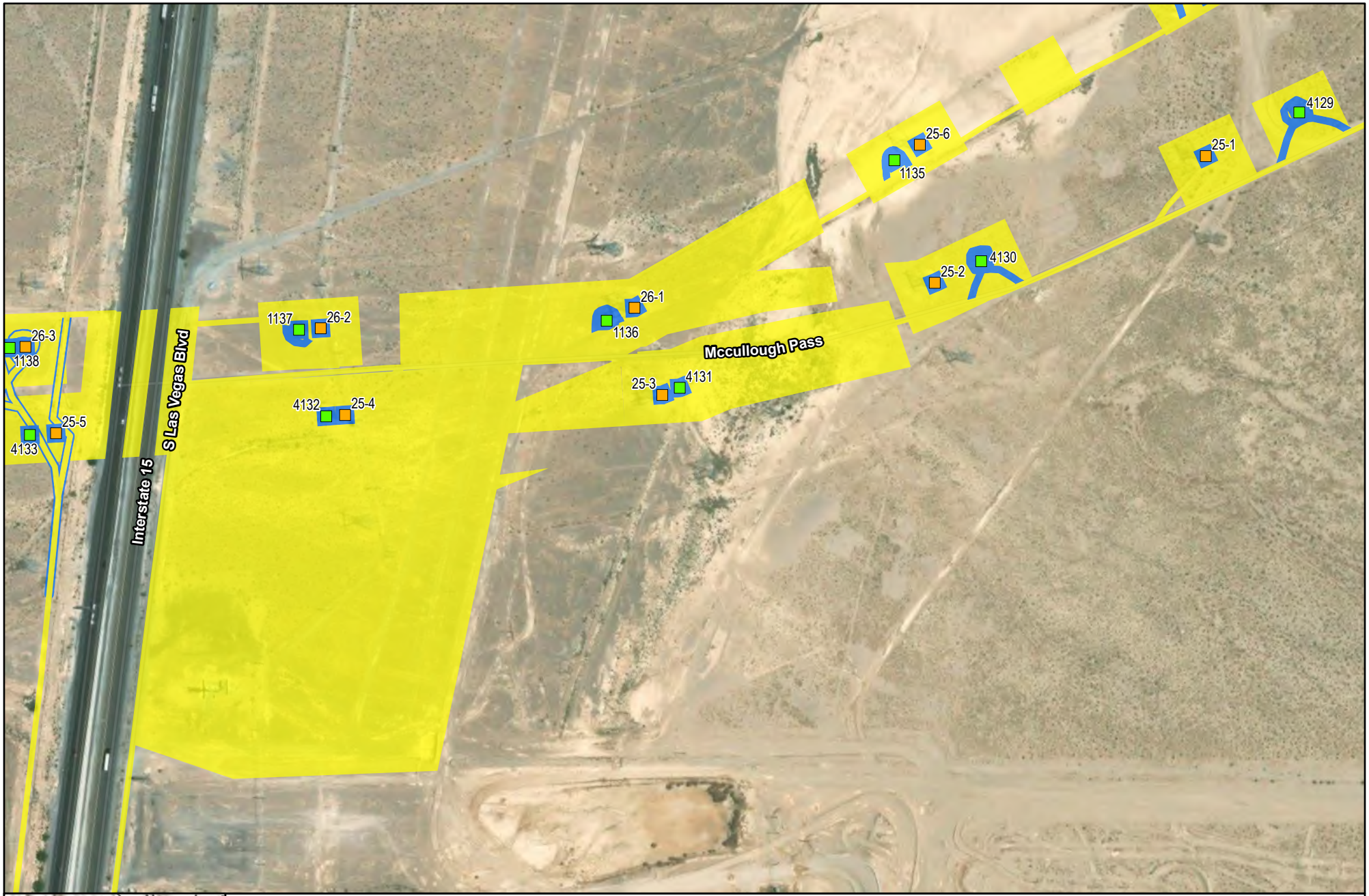

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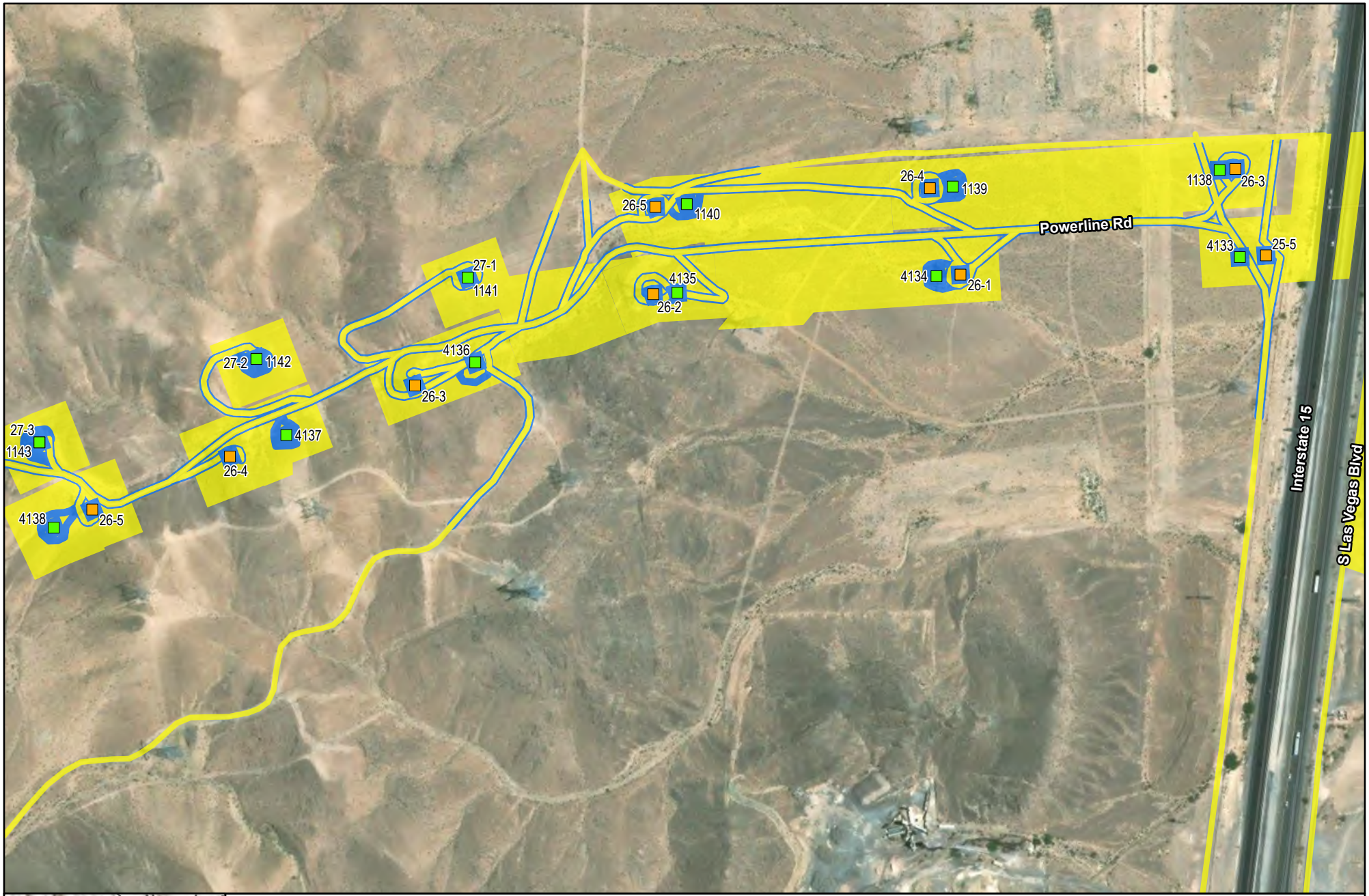

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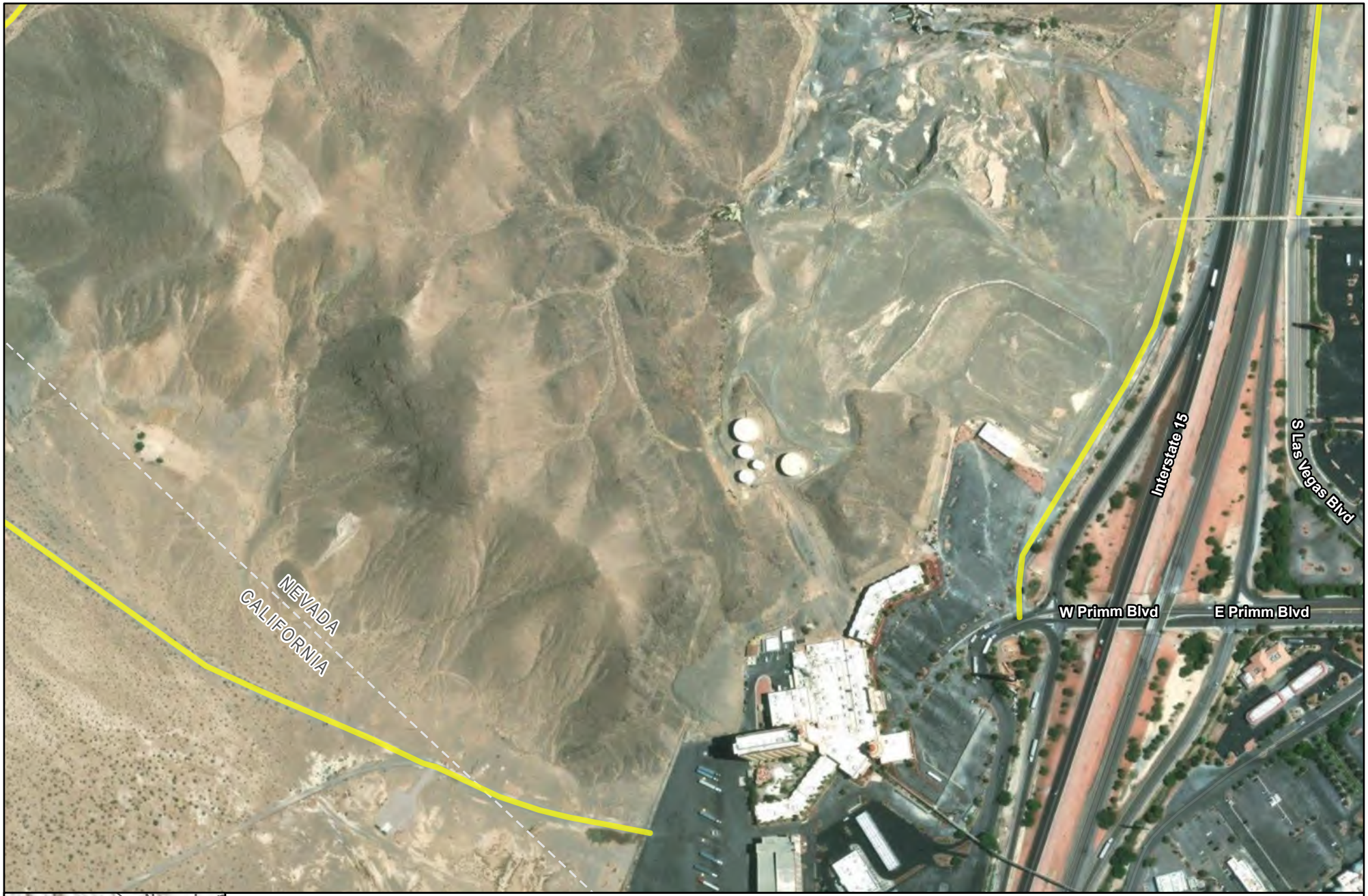

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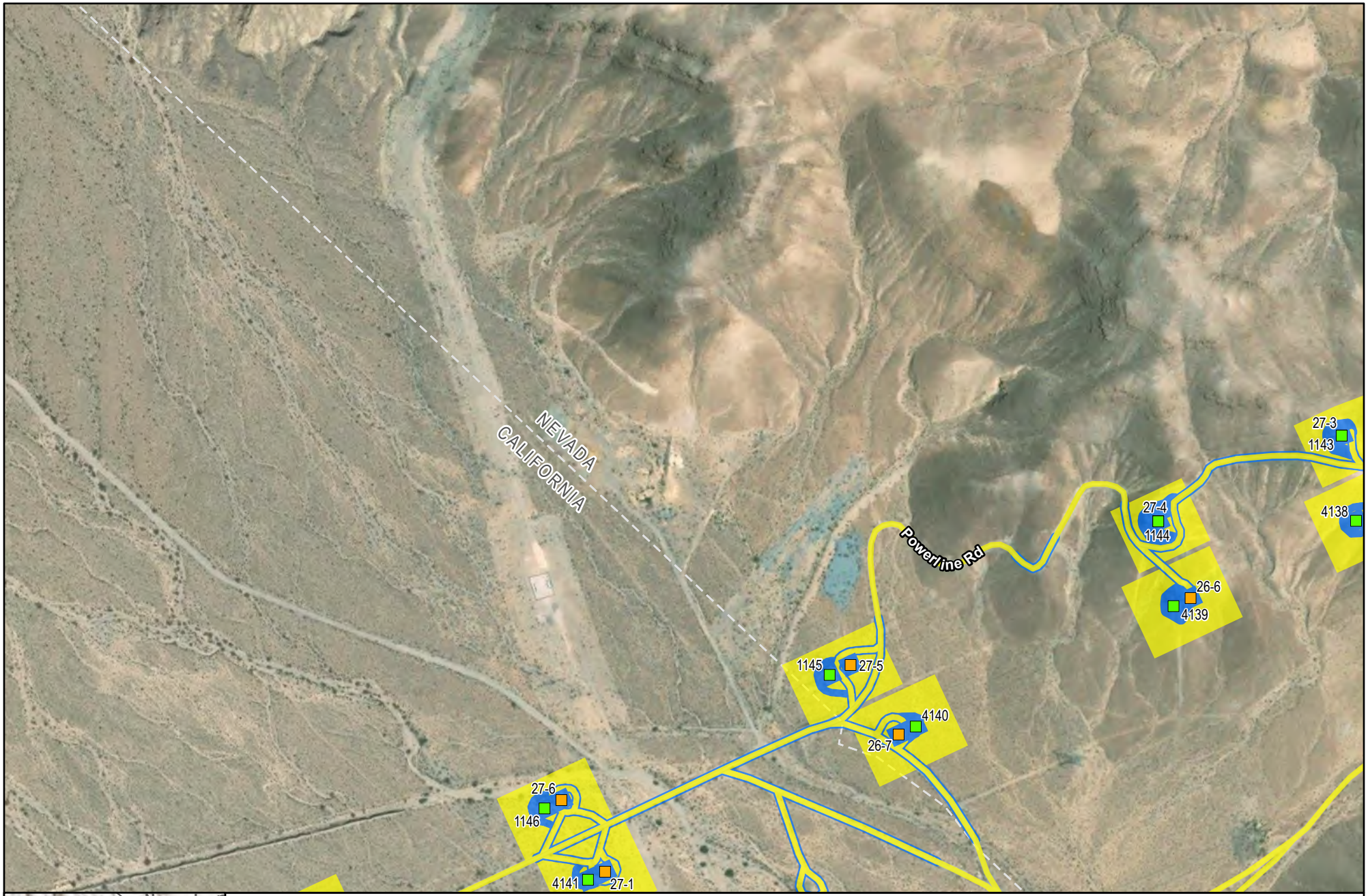

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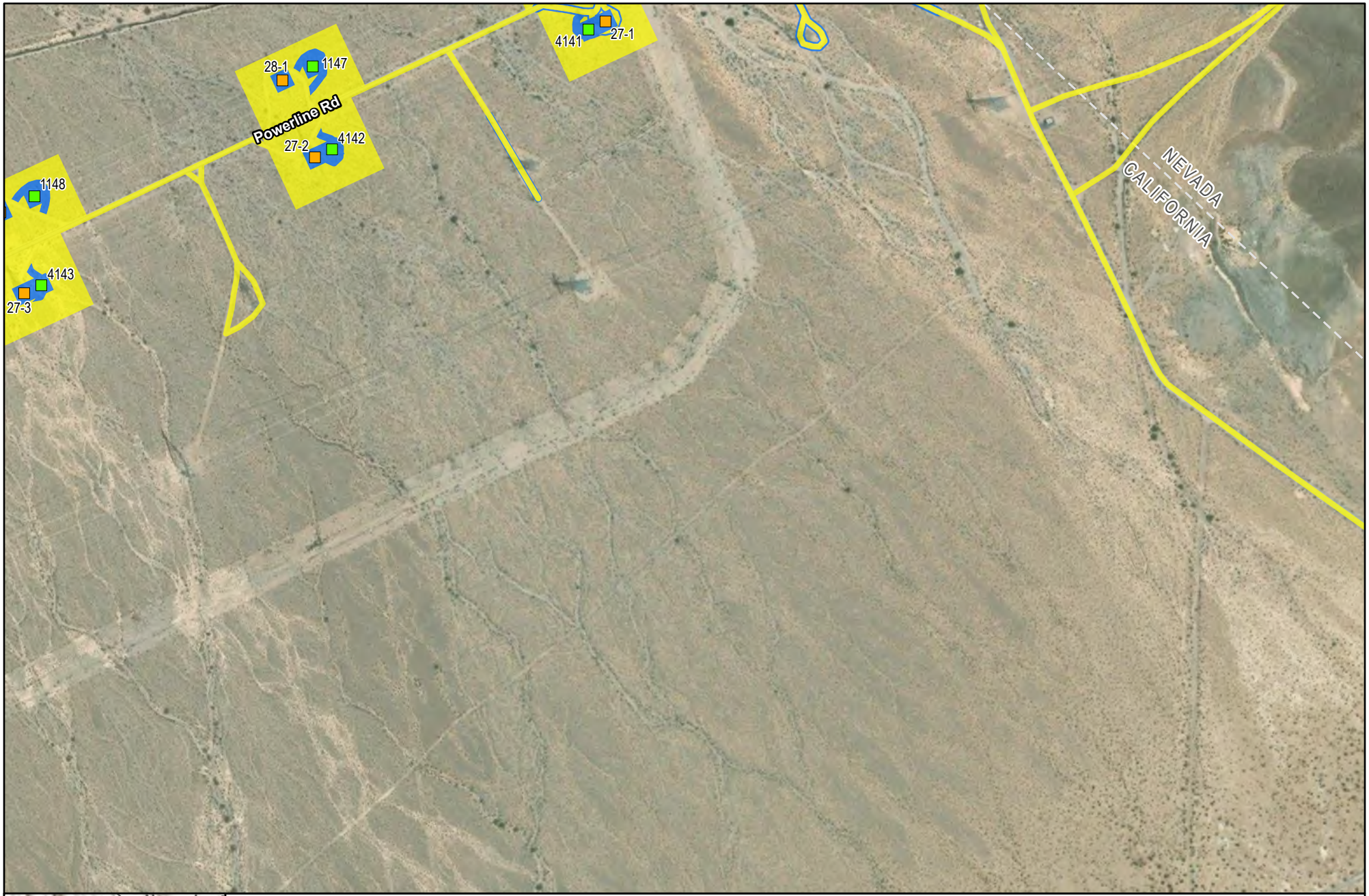

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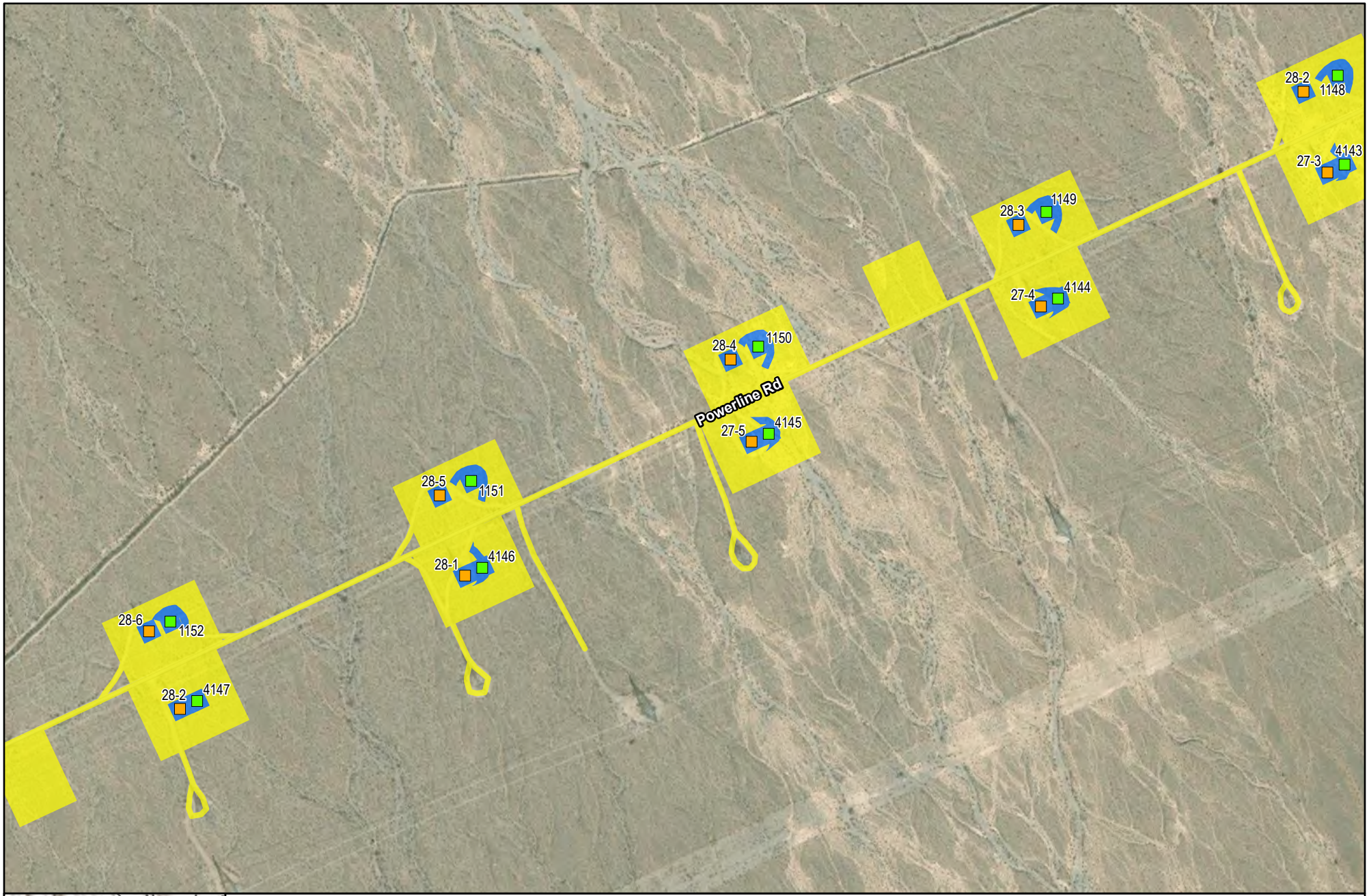

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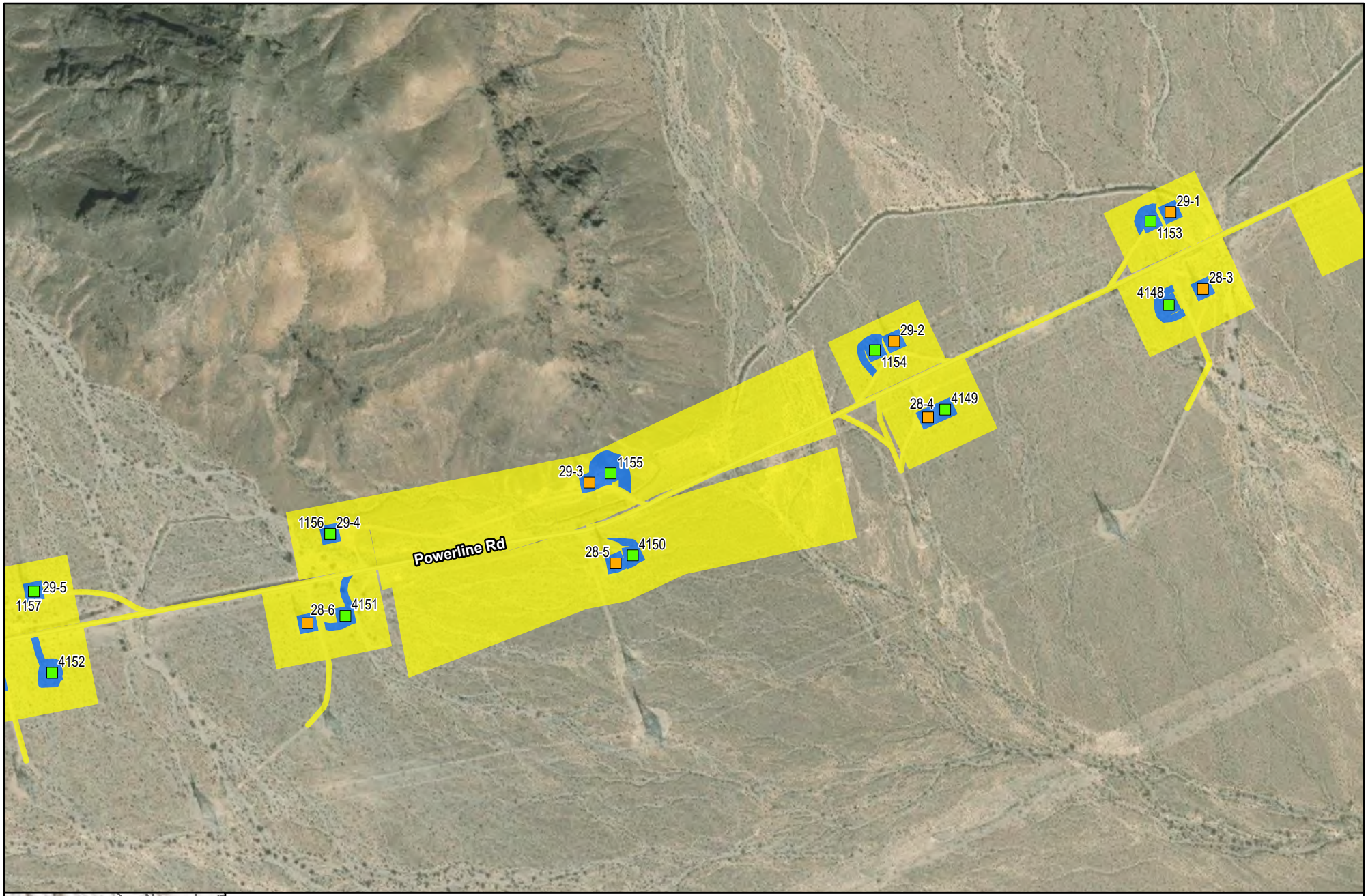

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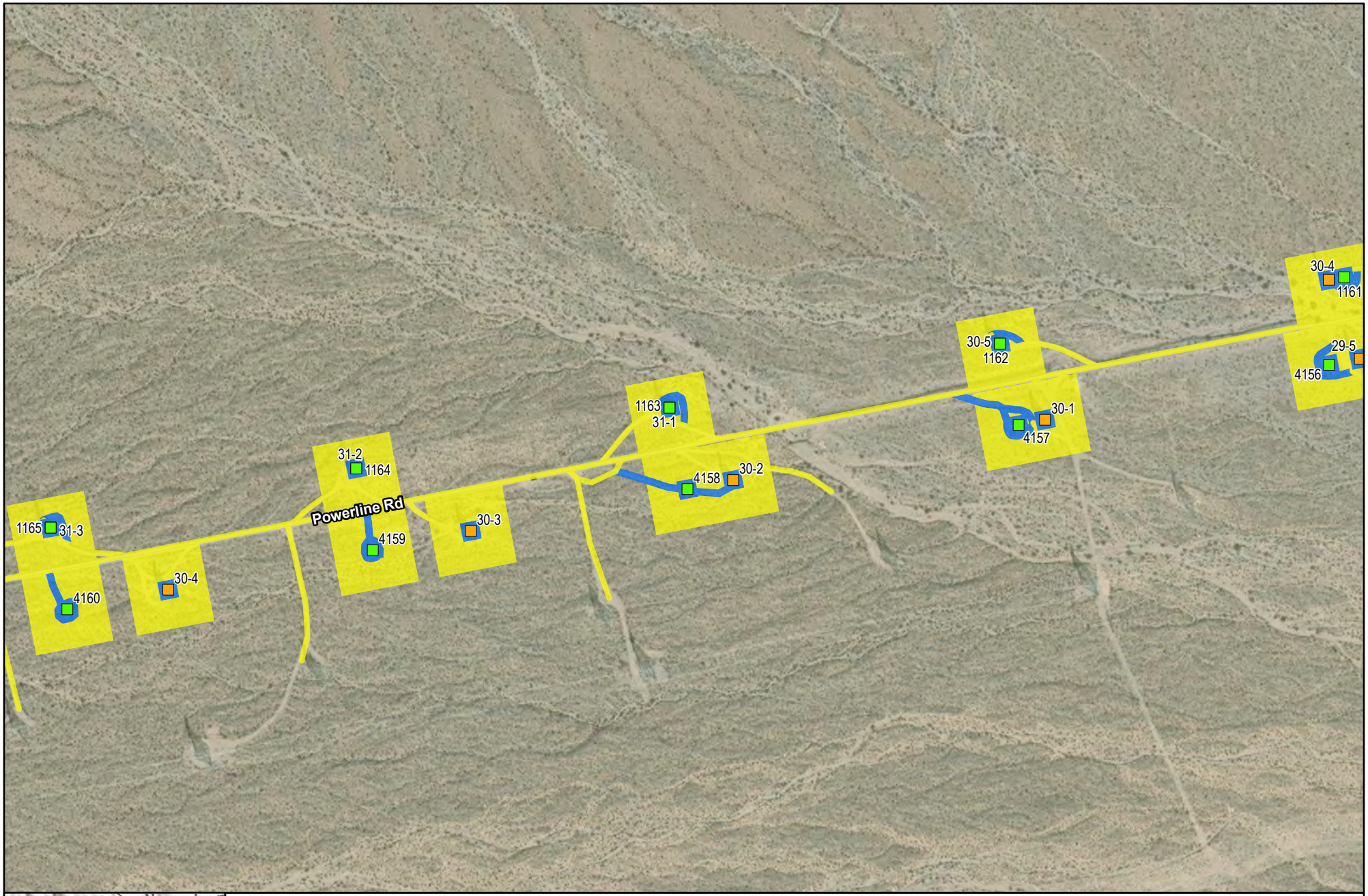

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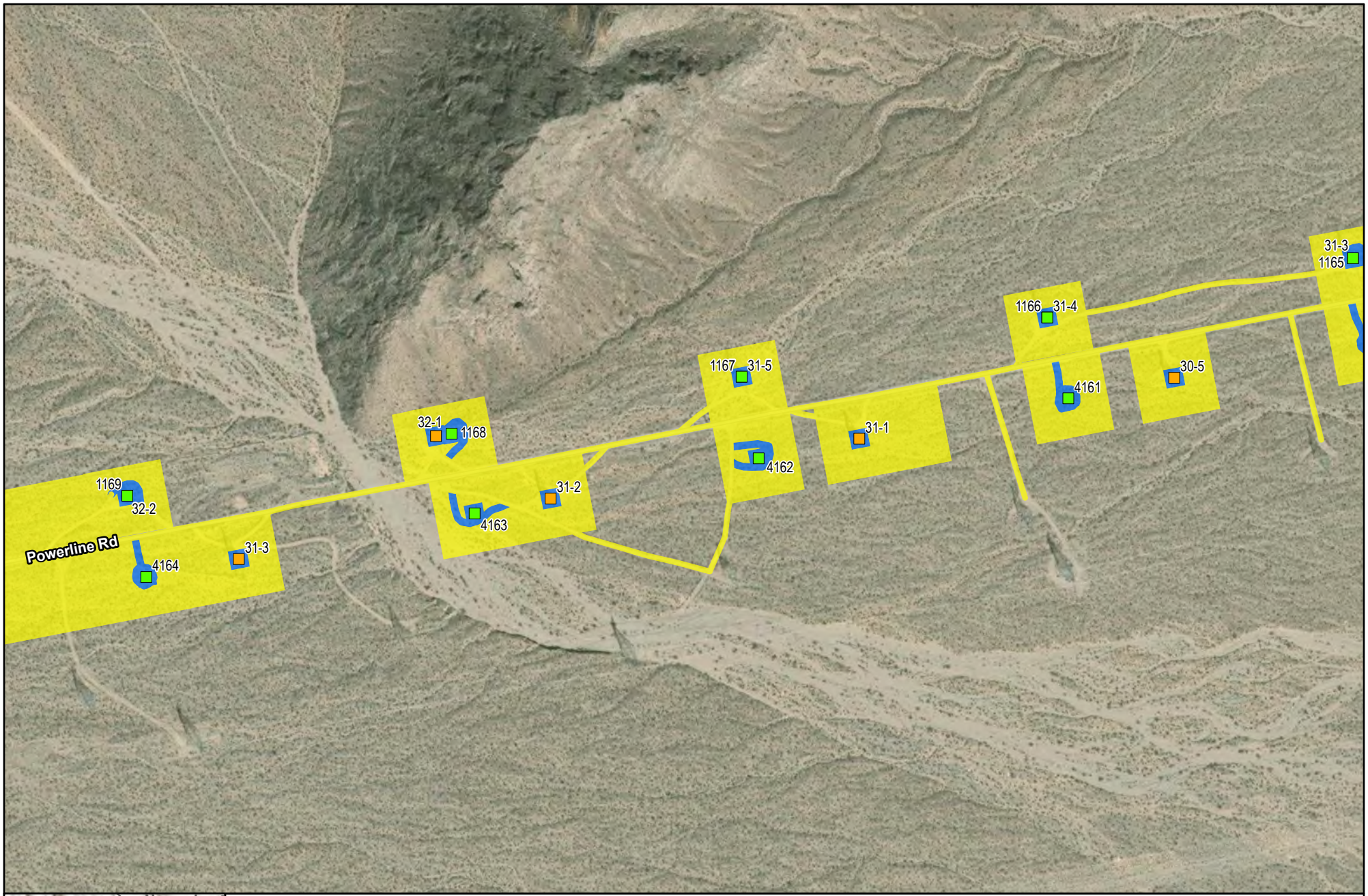

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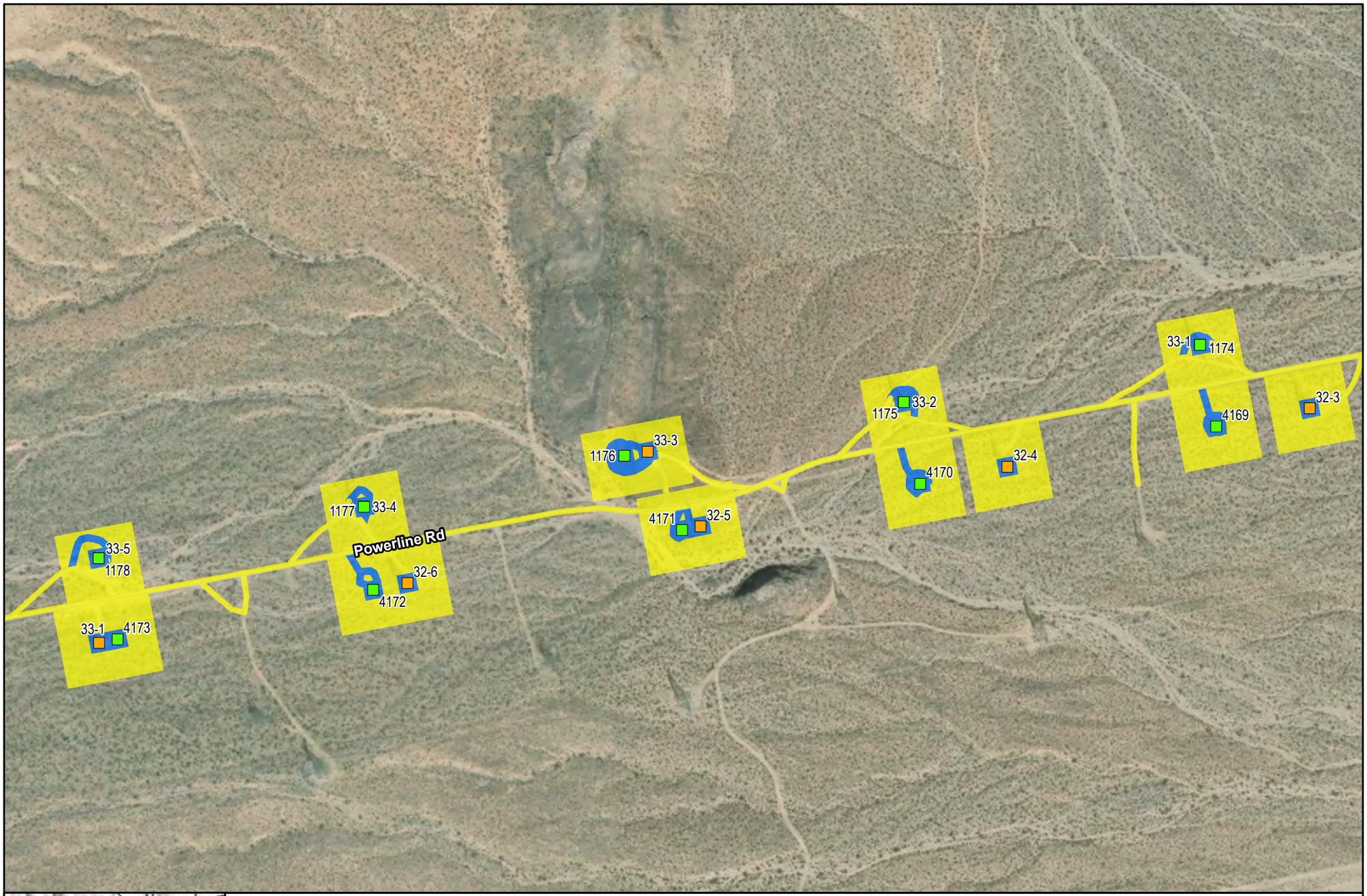

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PERMANENT AND TEMPORARY IMPACT AREAS

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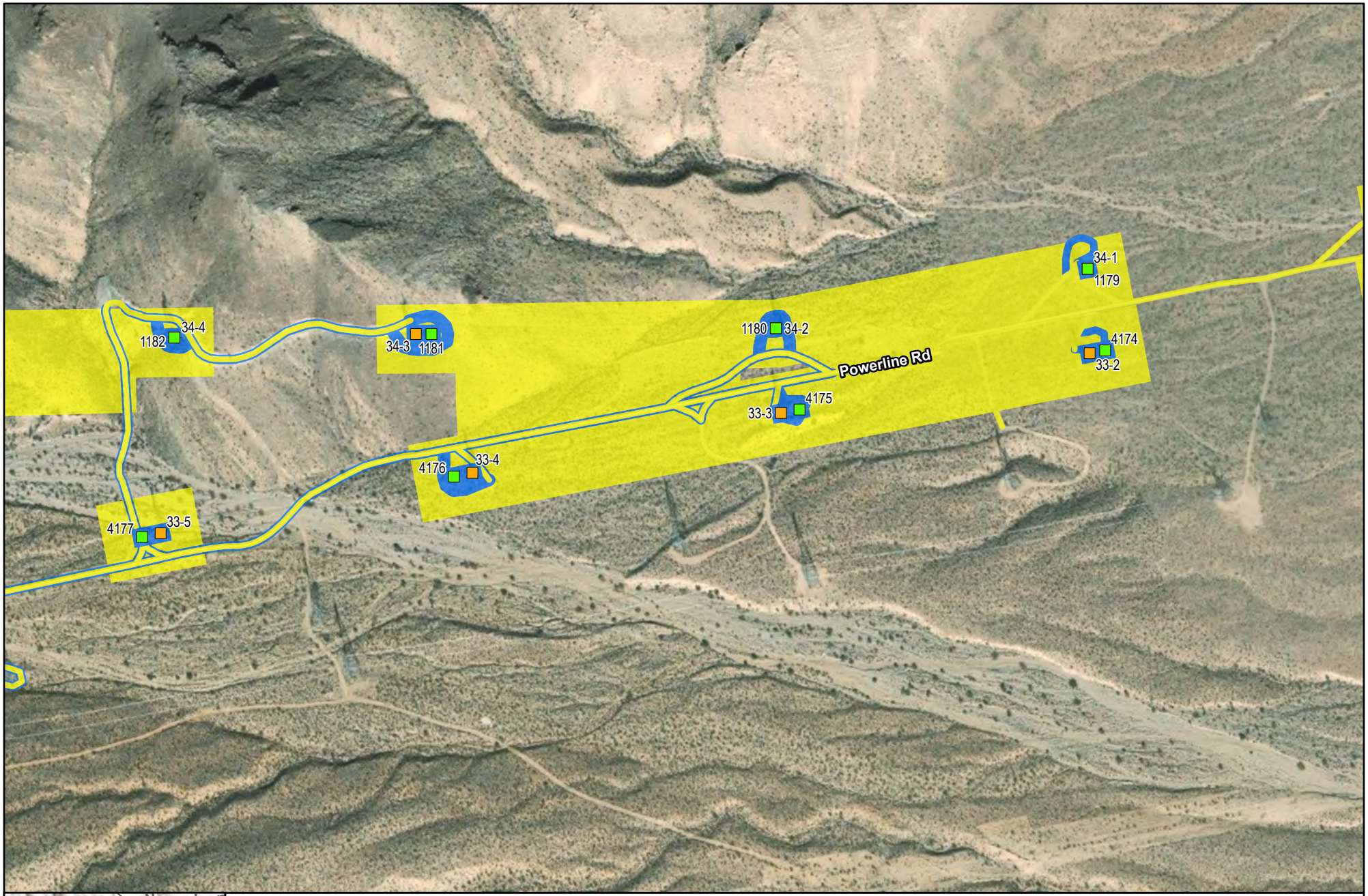

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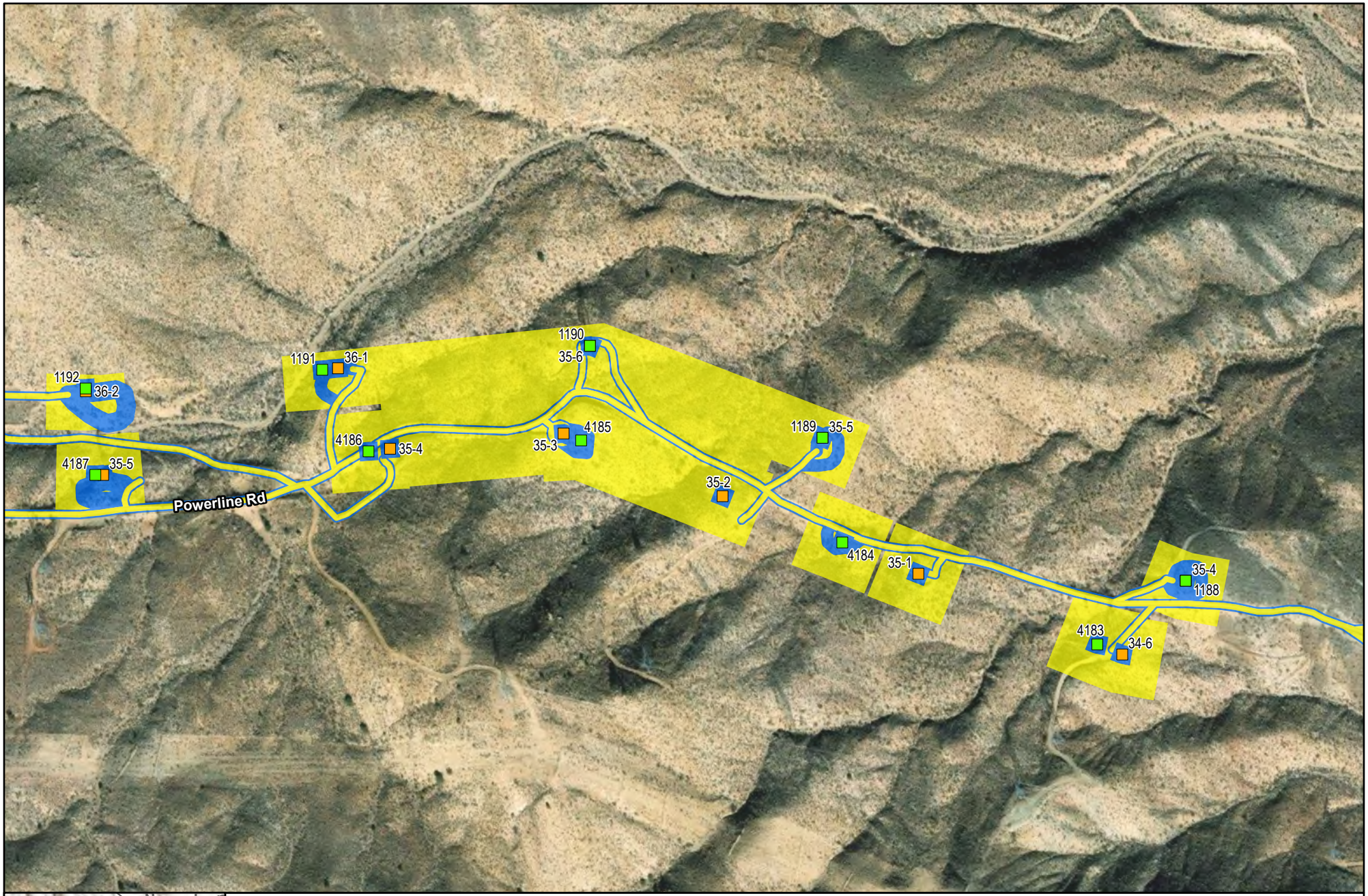

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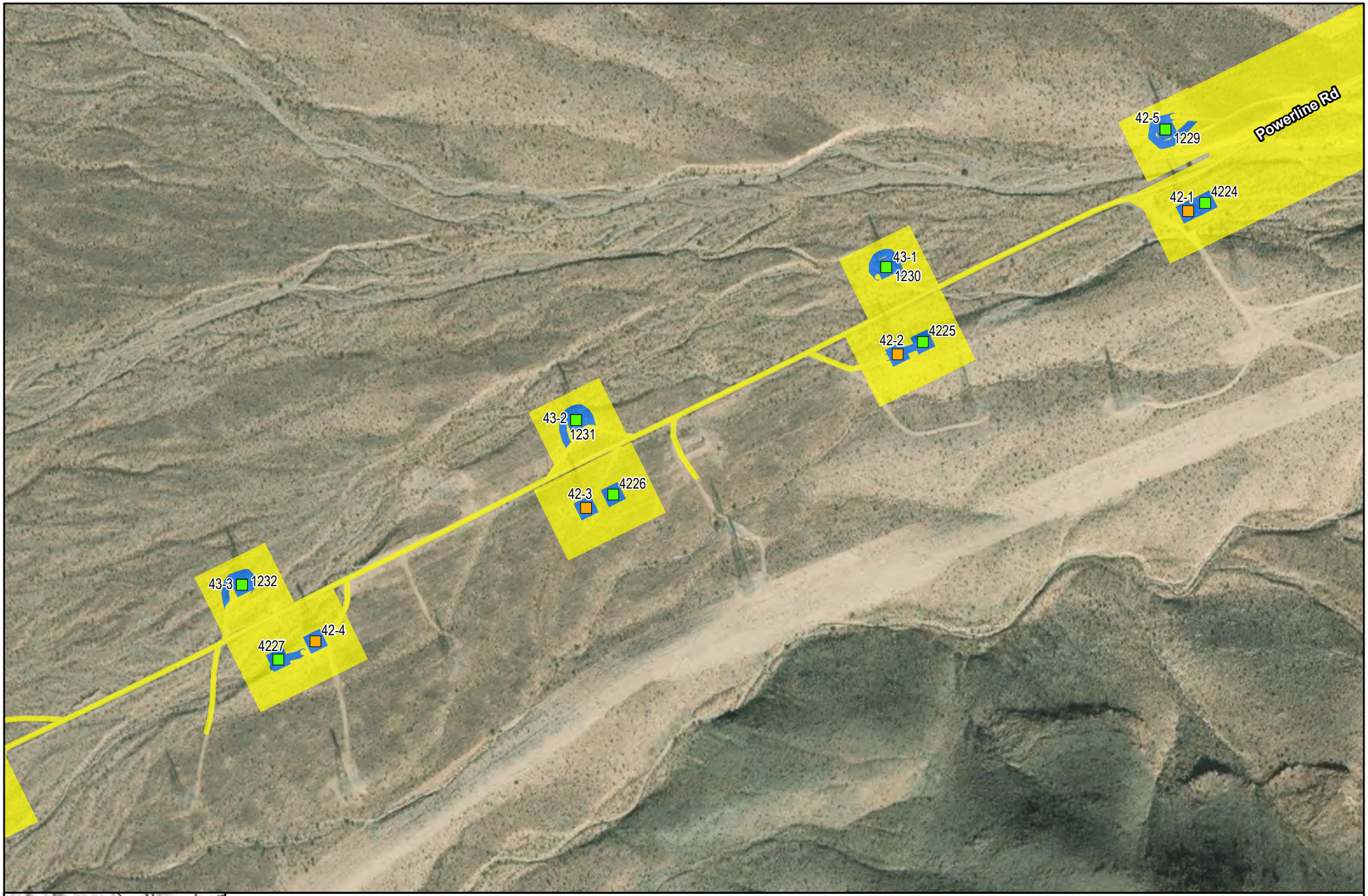

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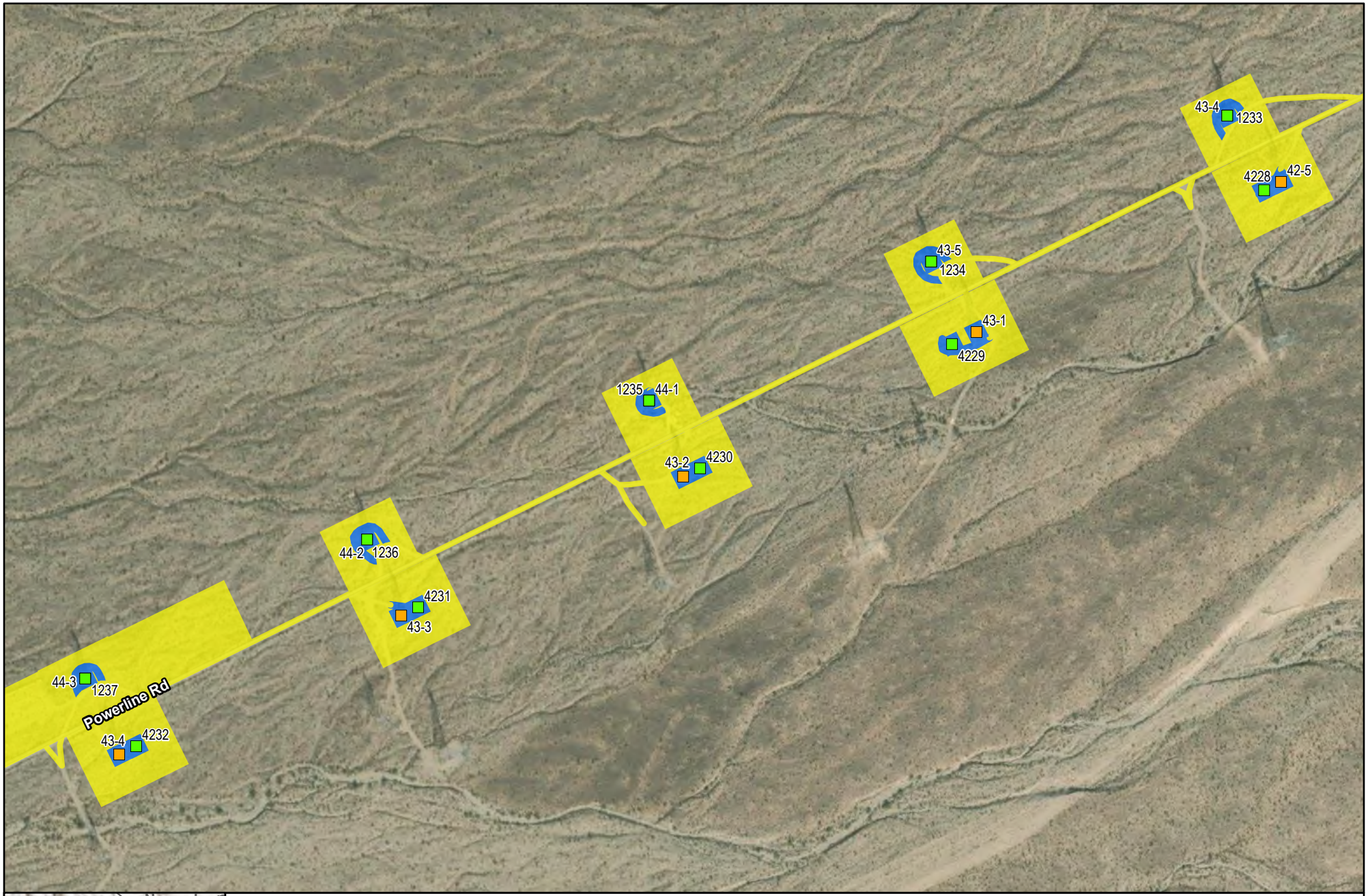

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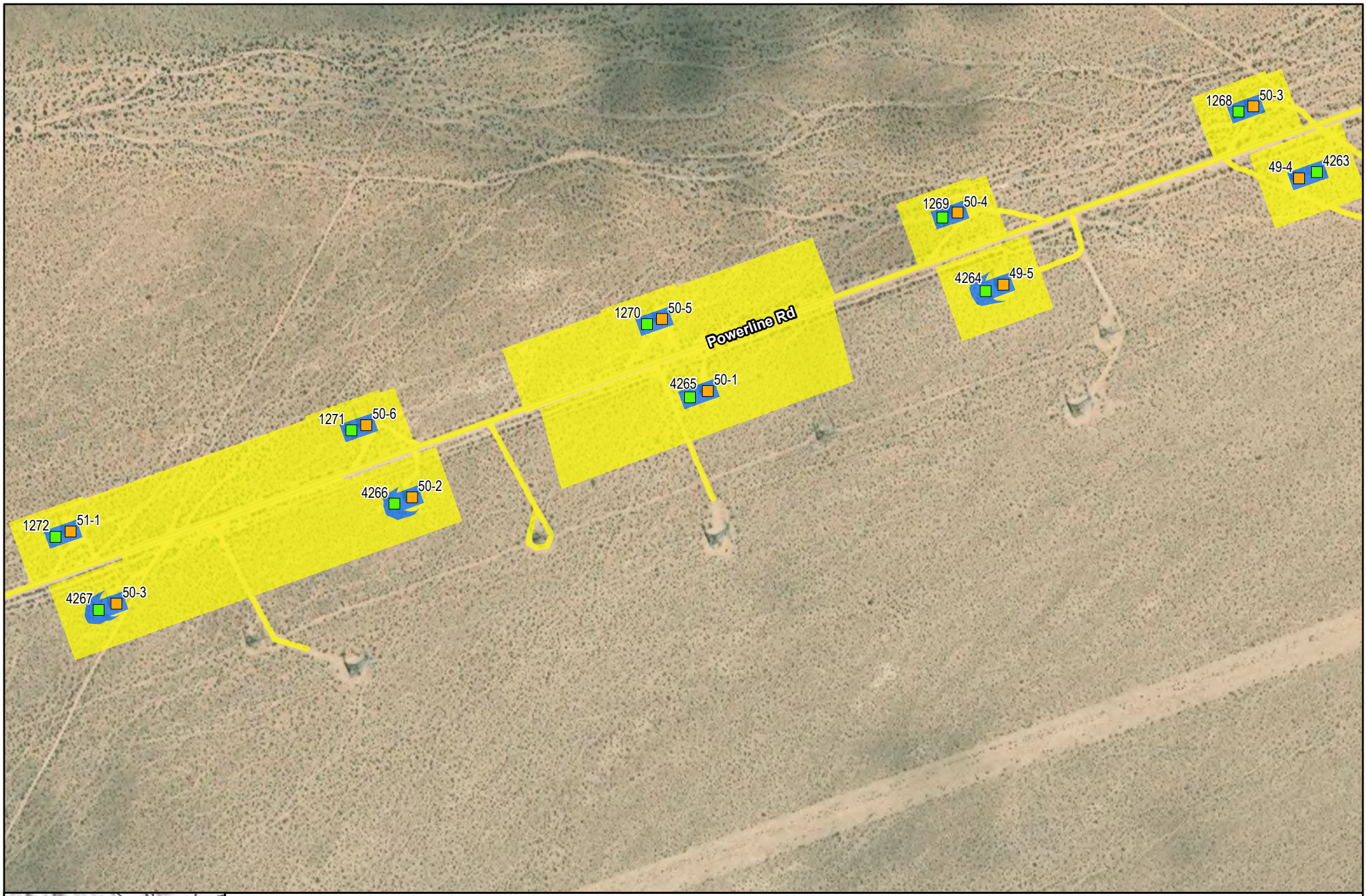

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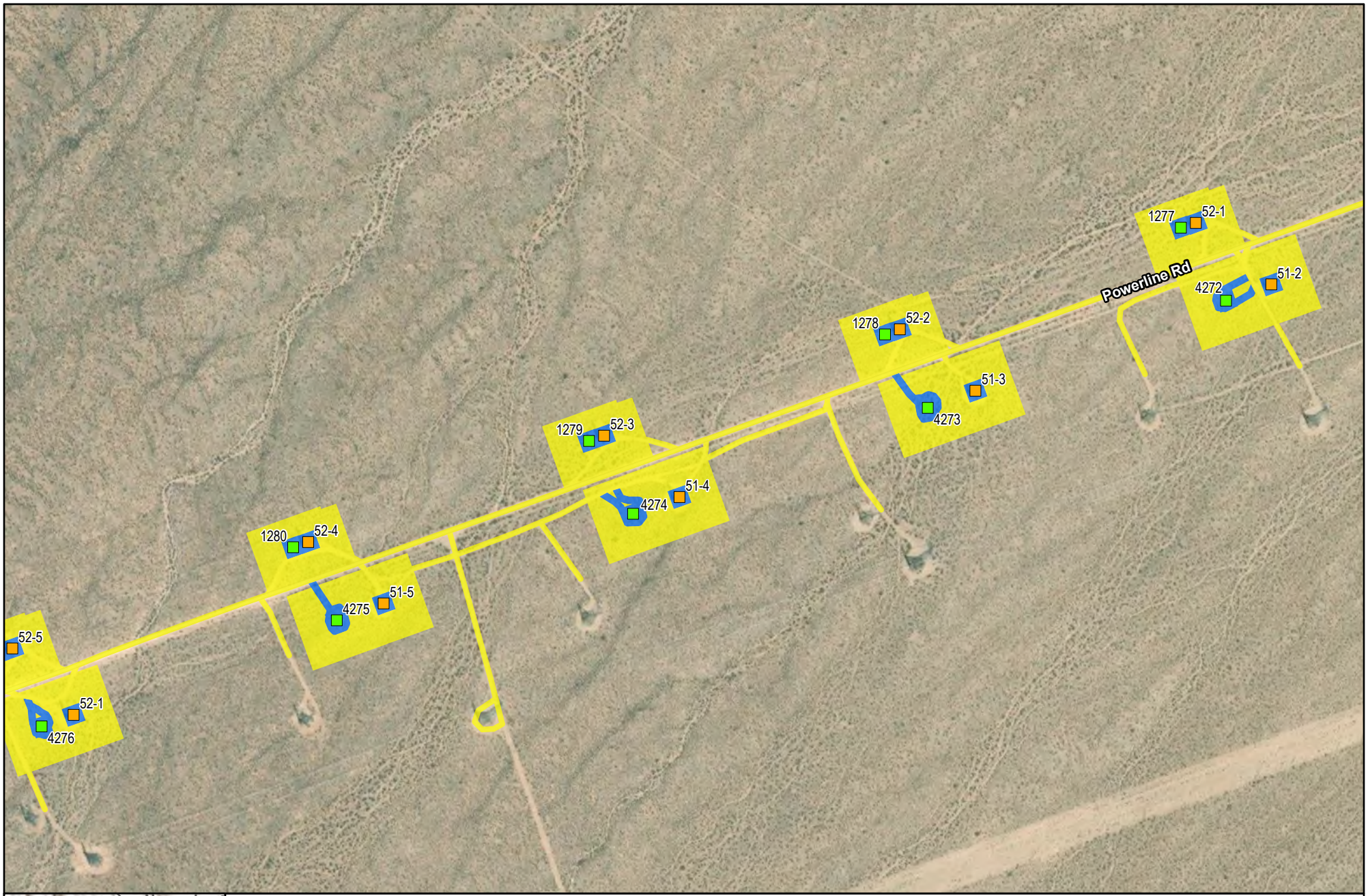

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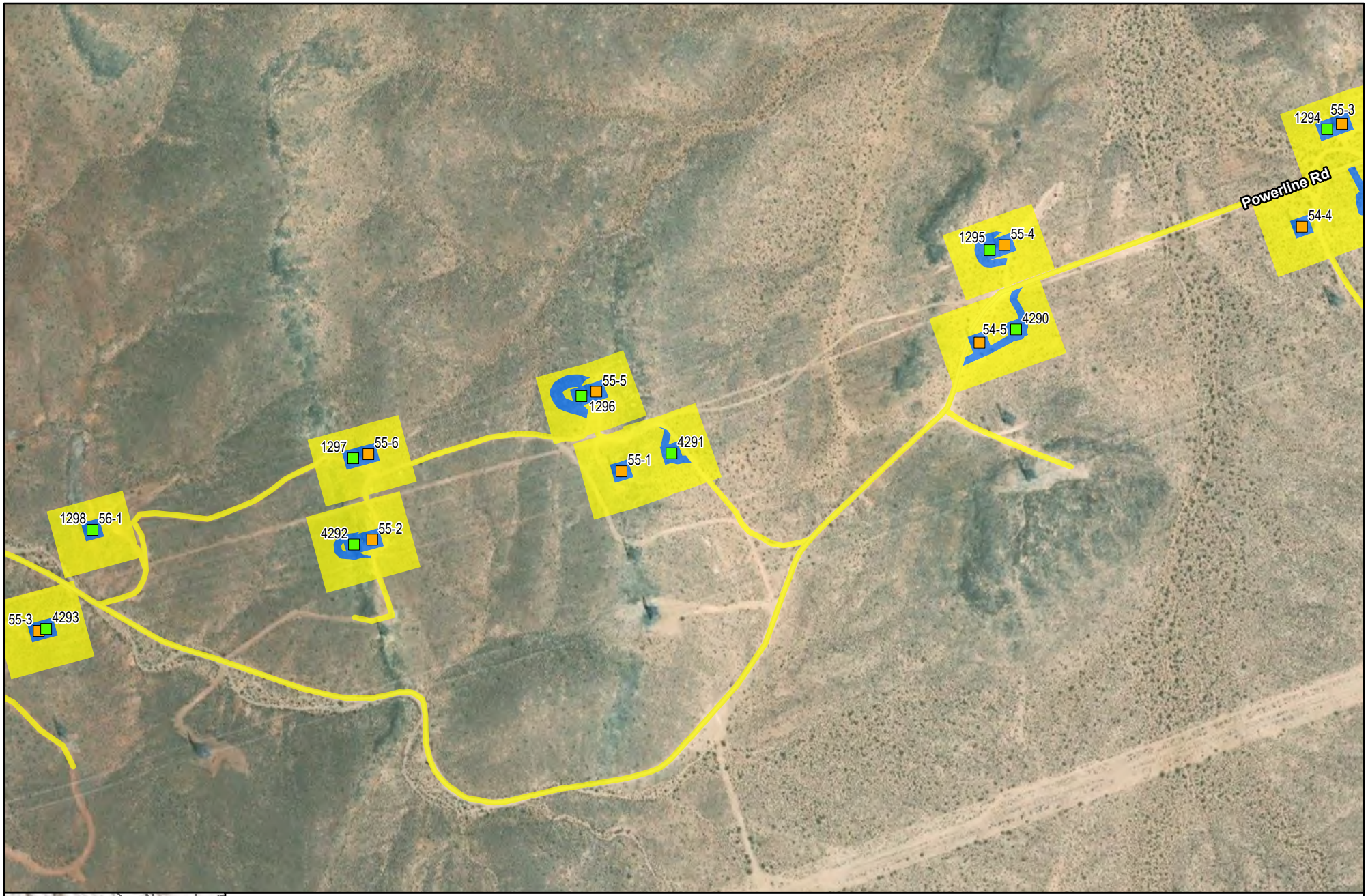

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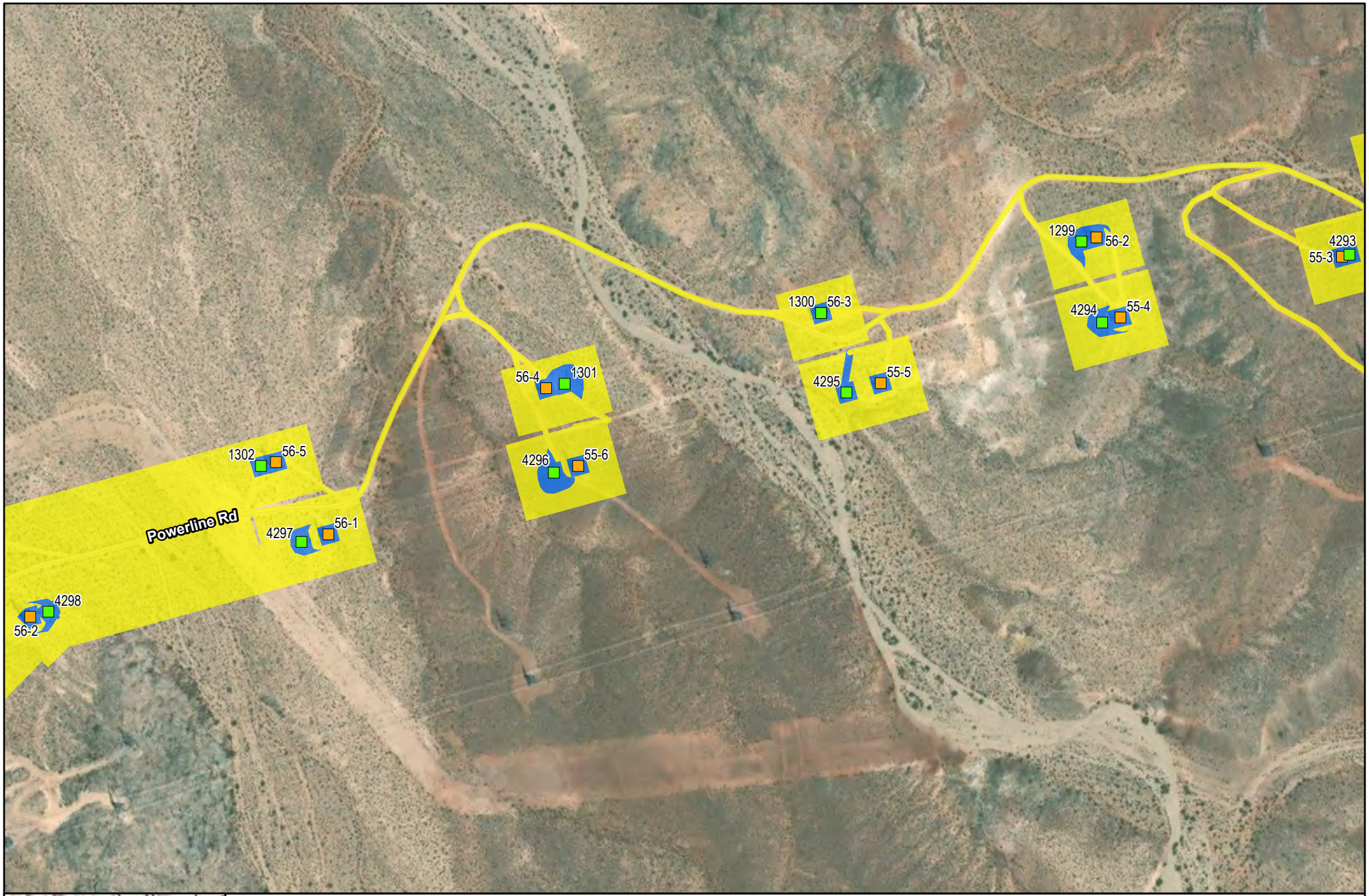

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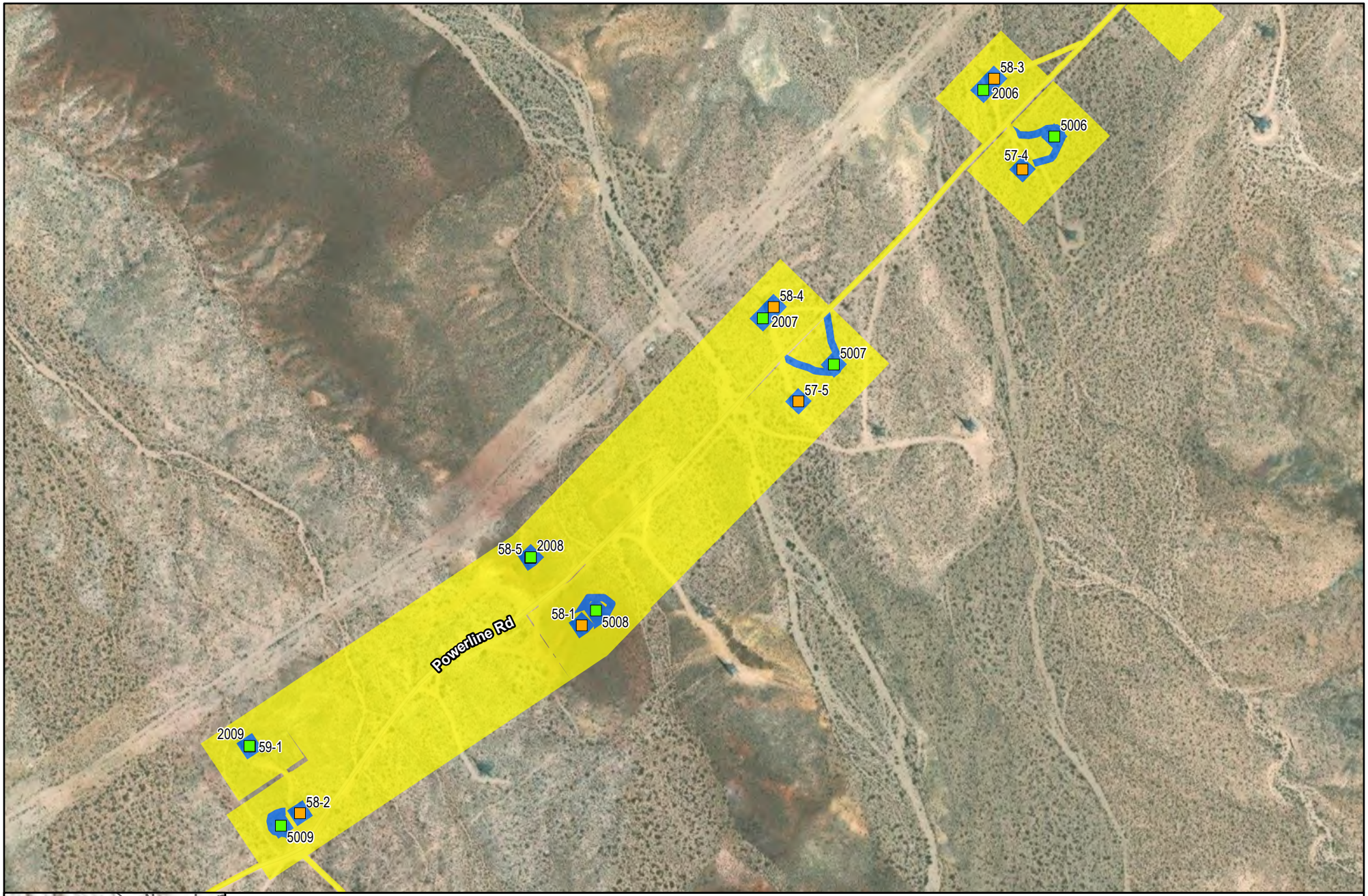

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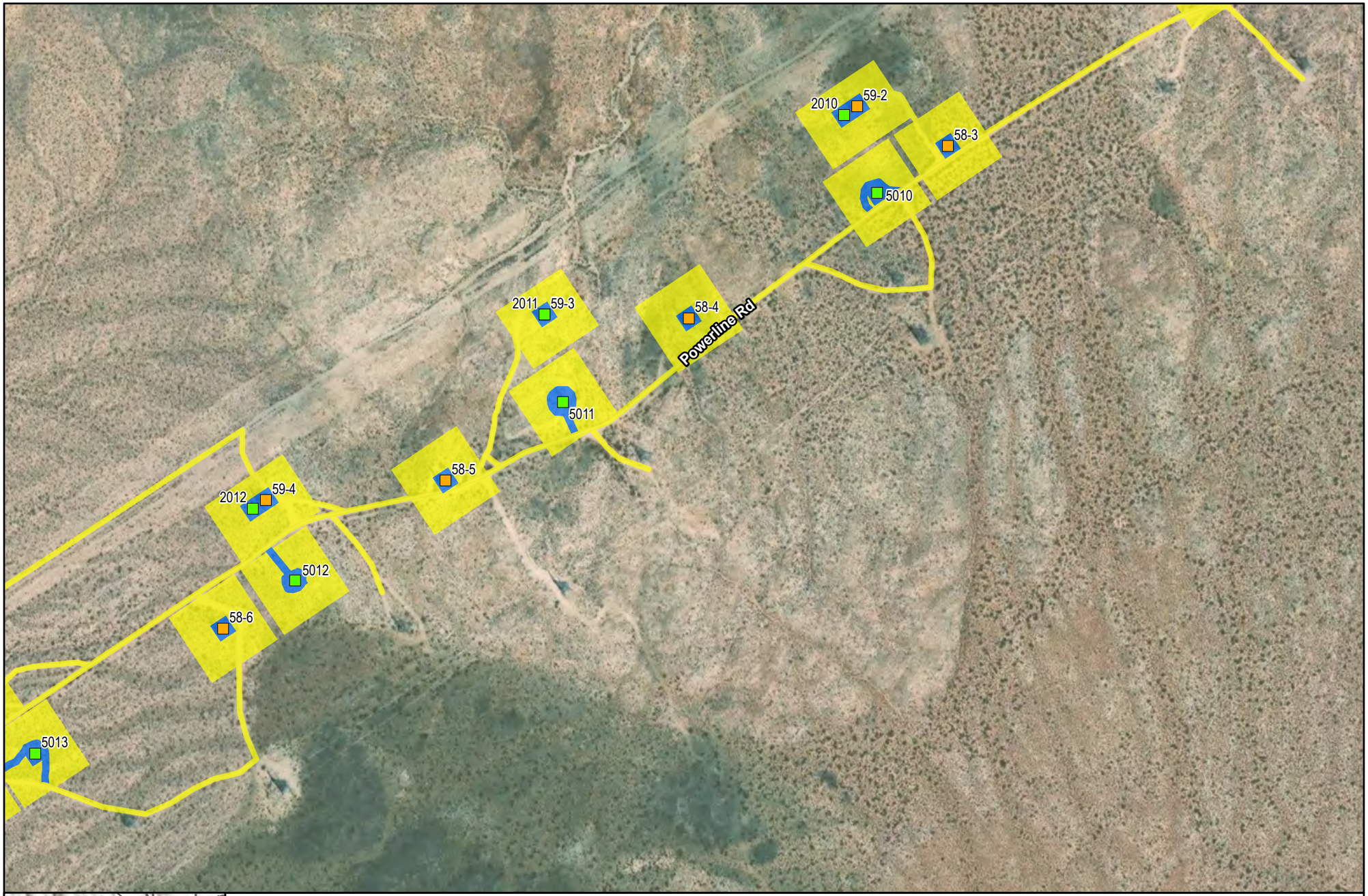

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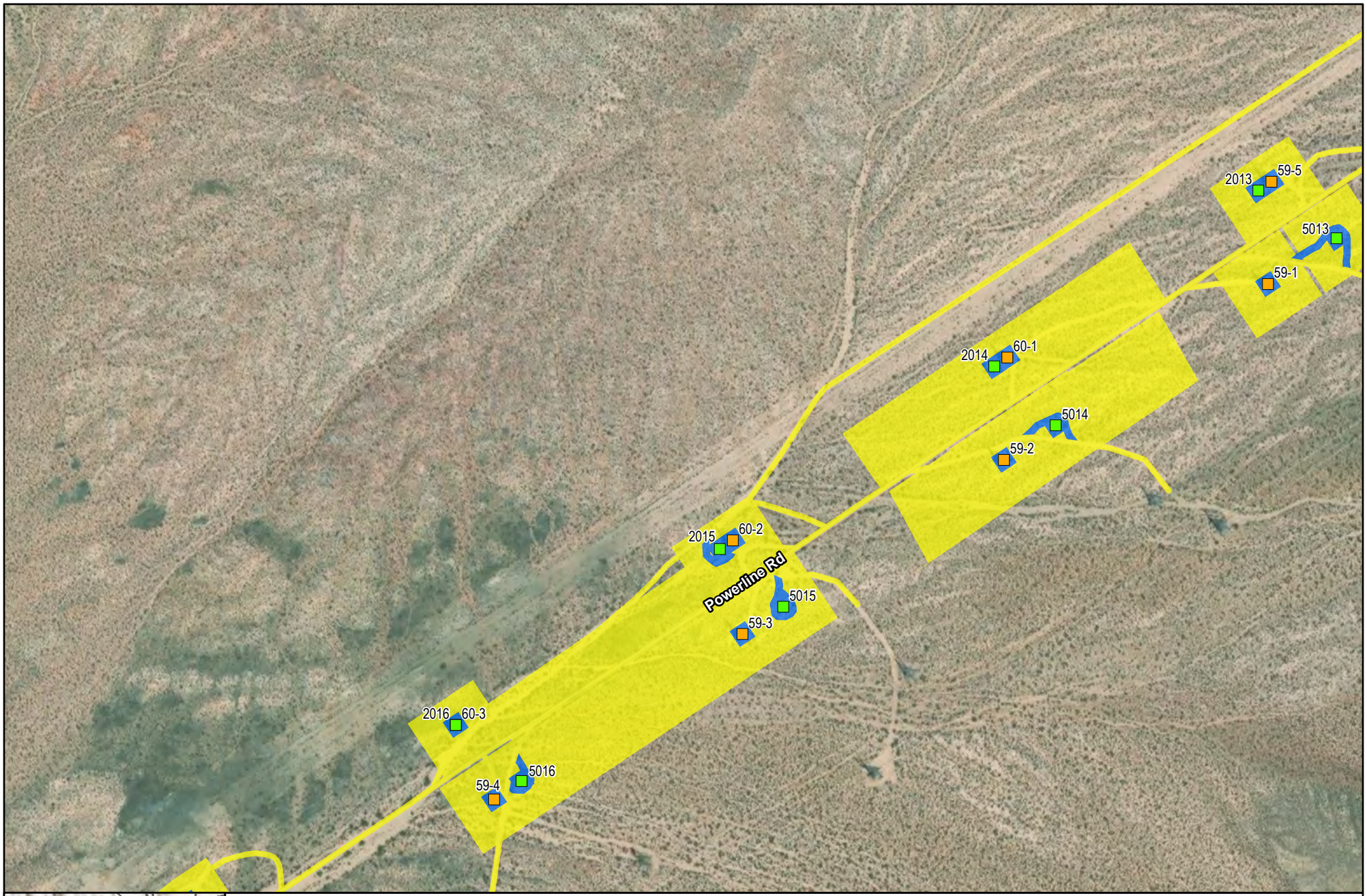

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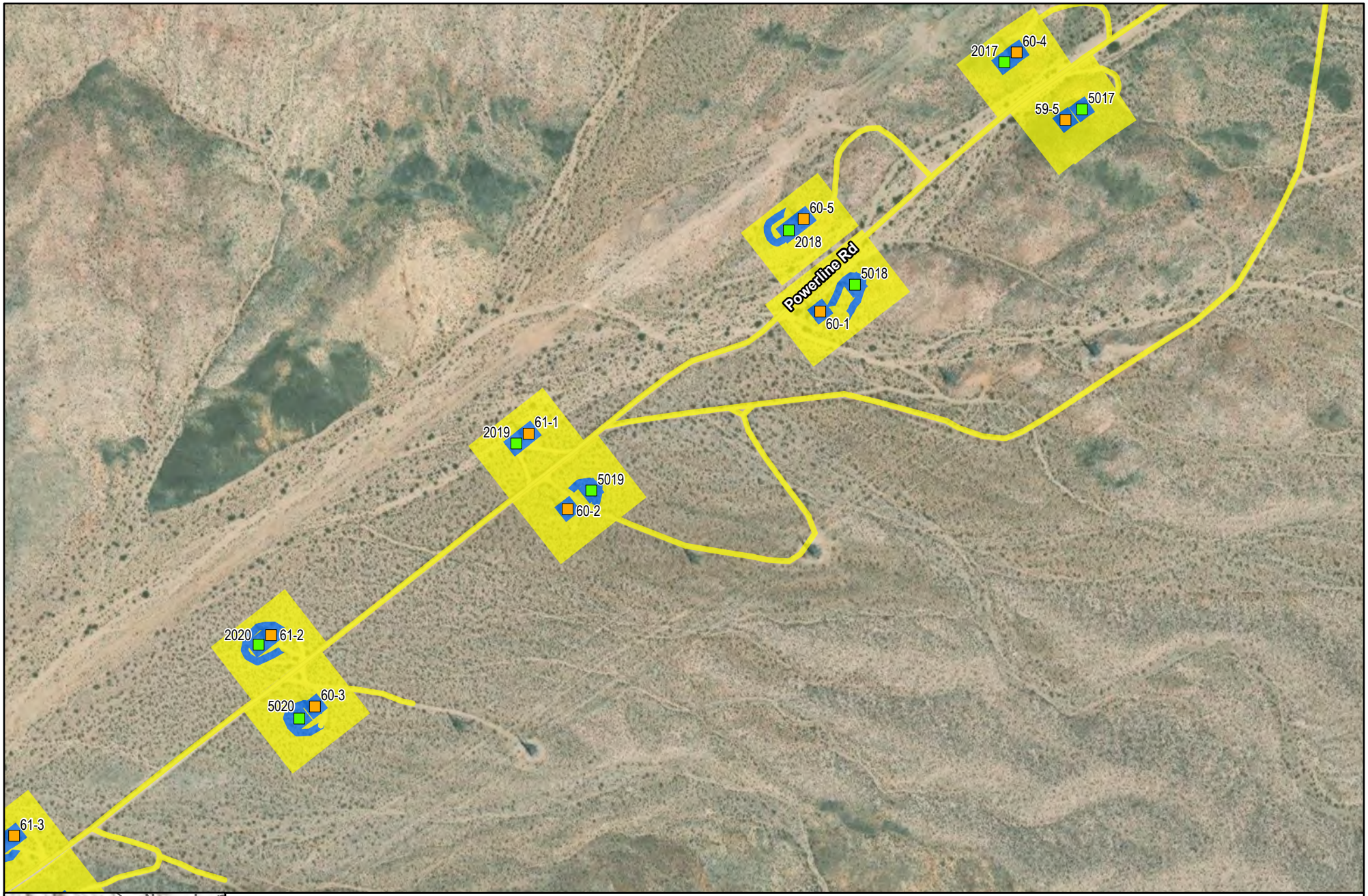

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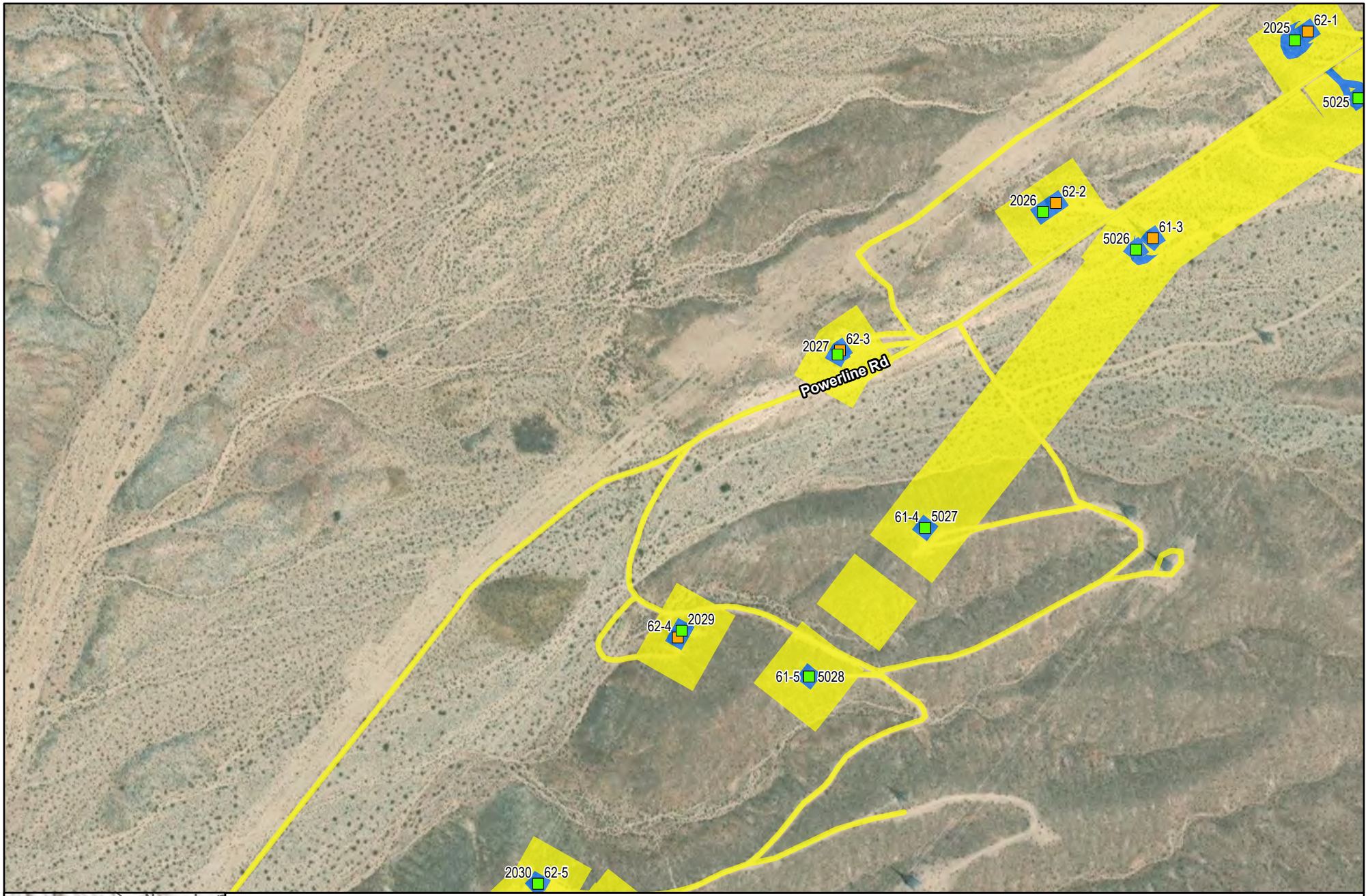

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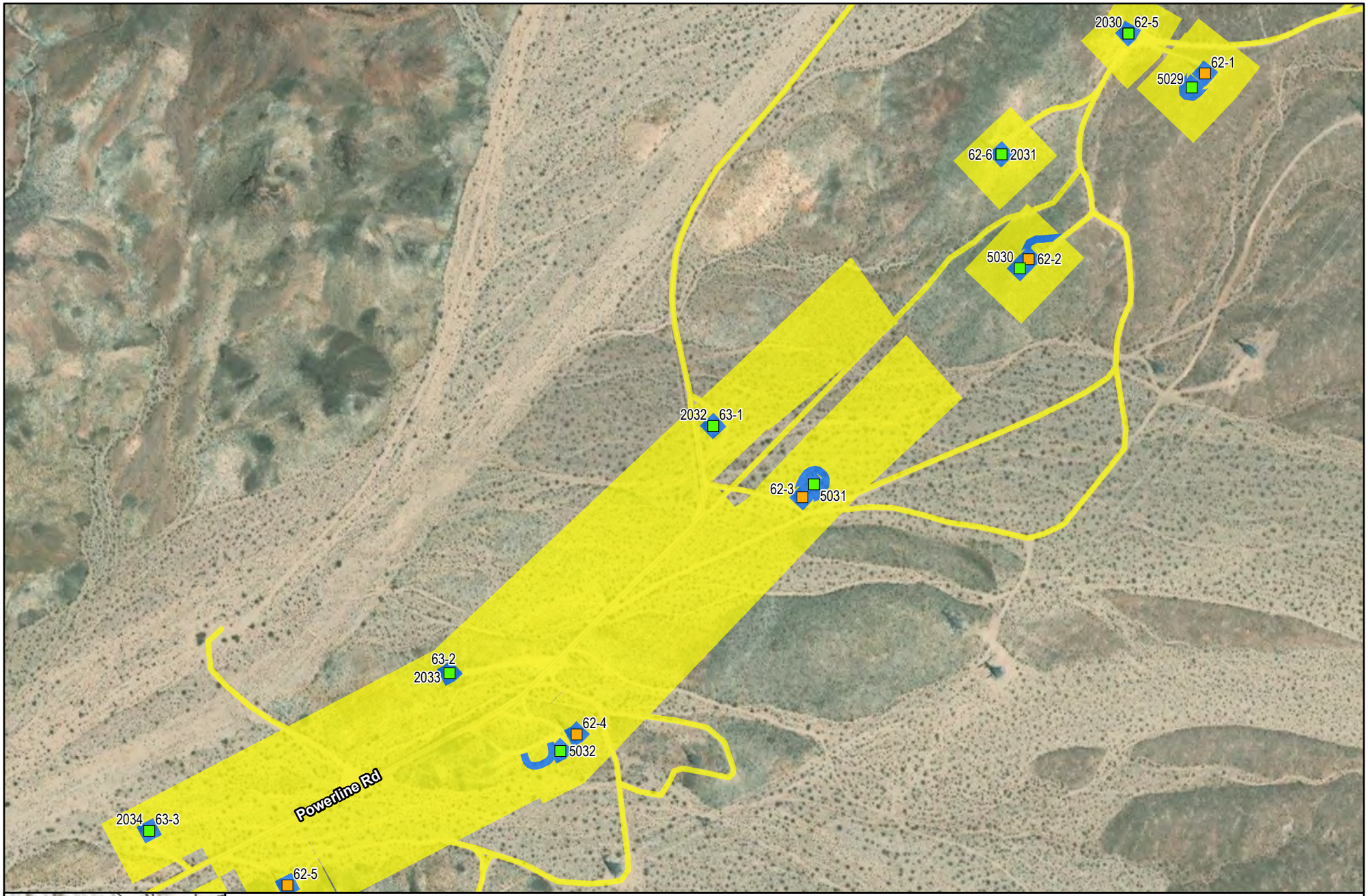

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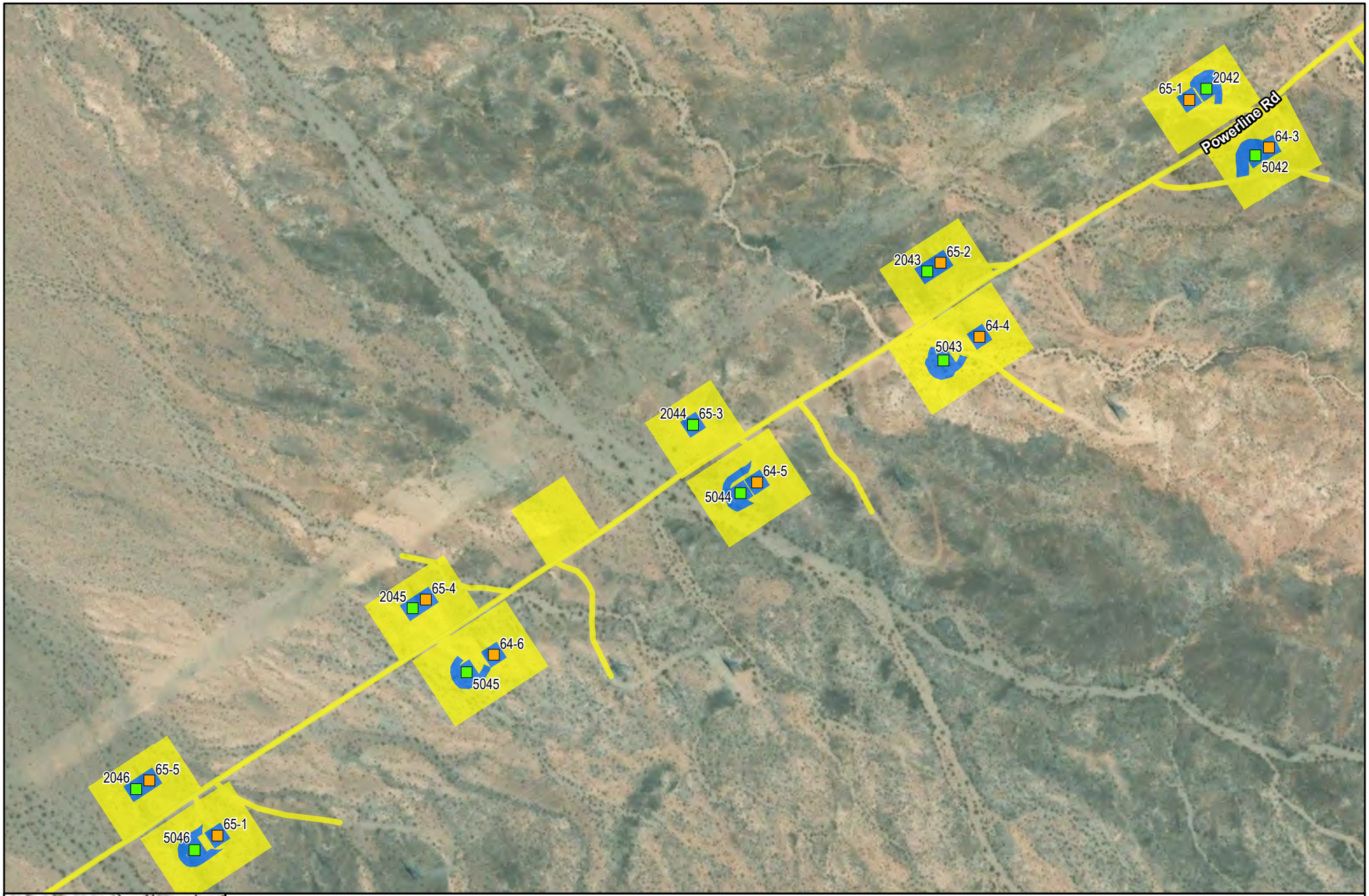

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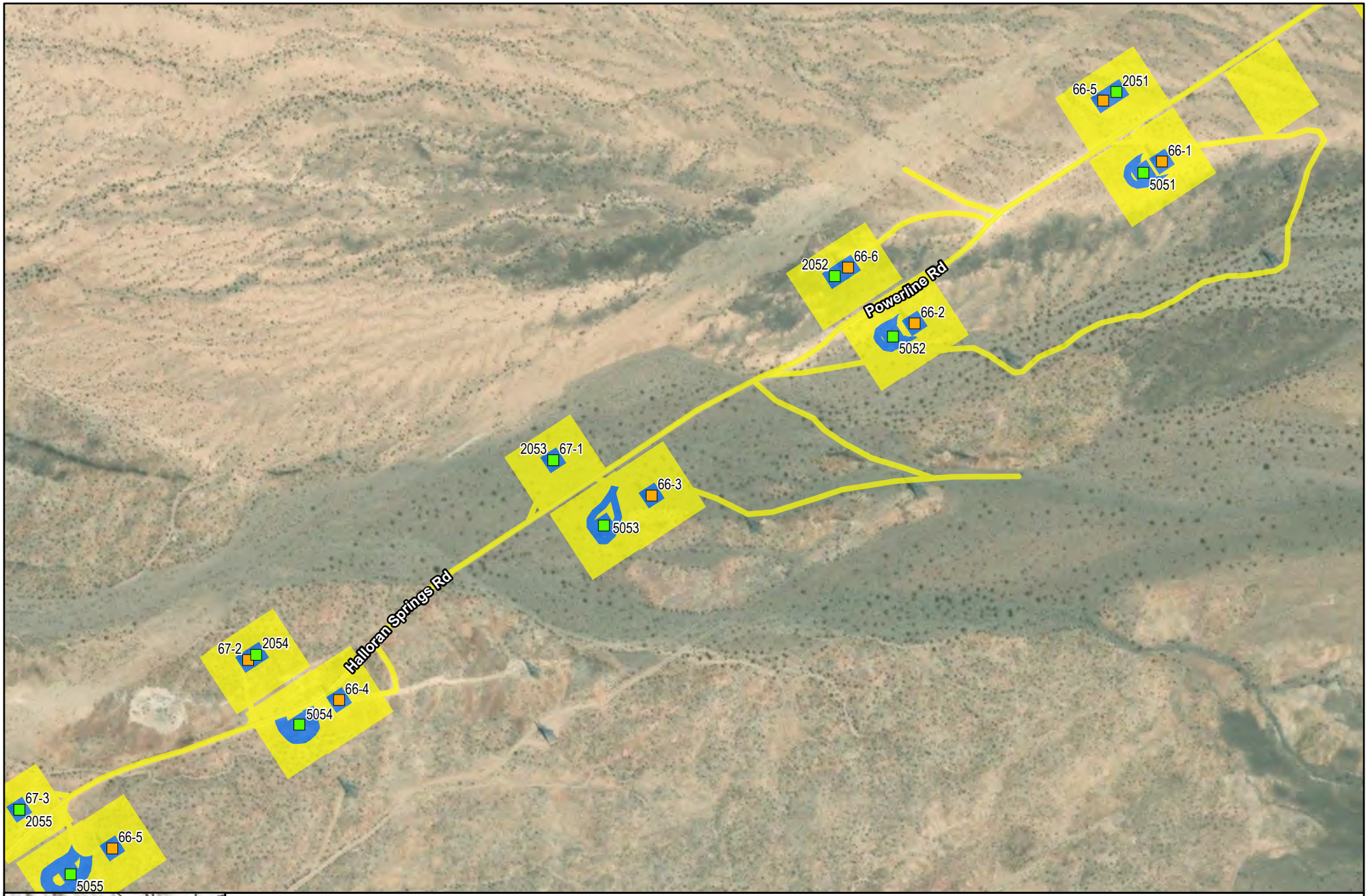

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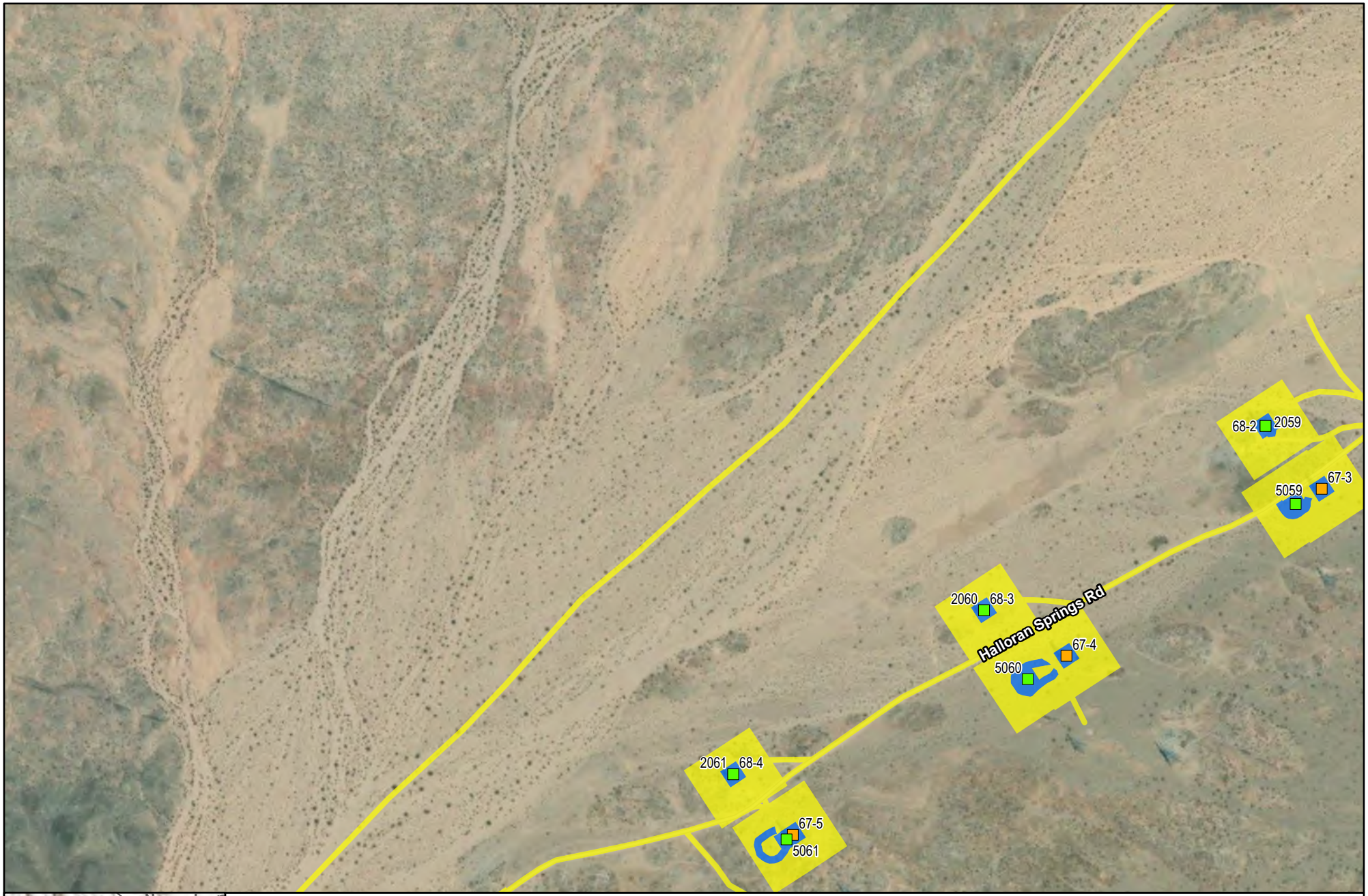

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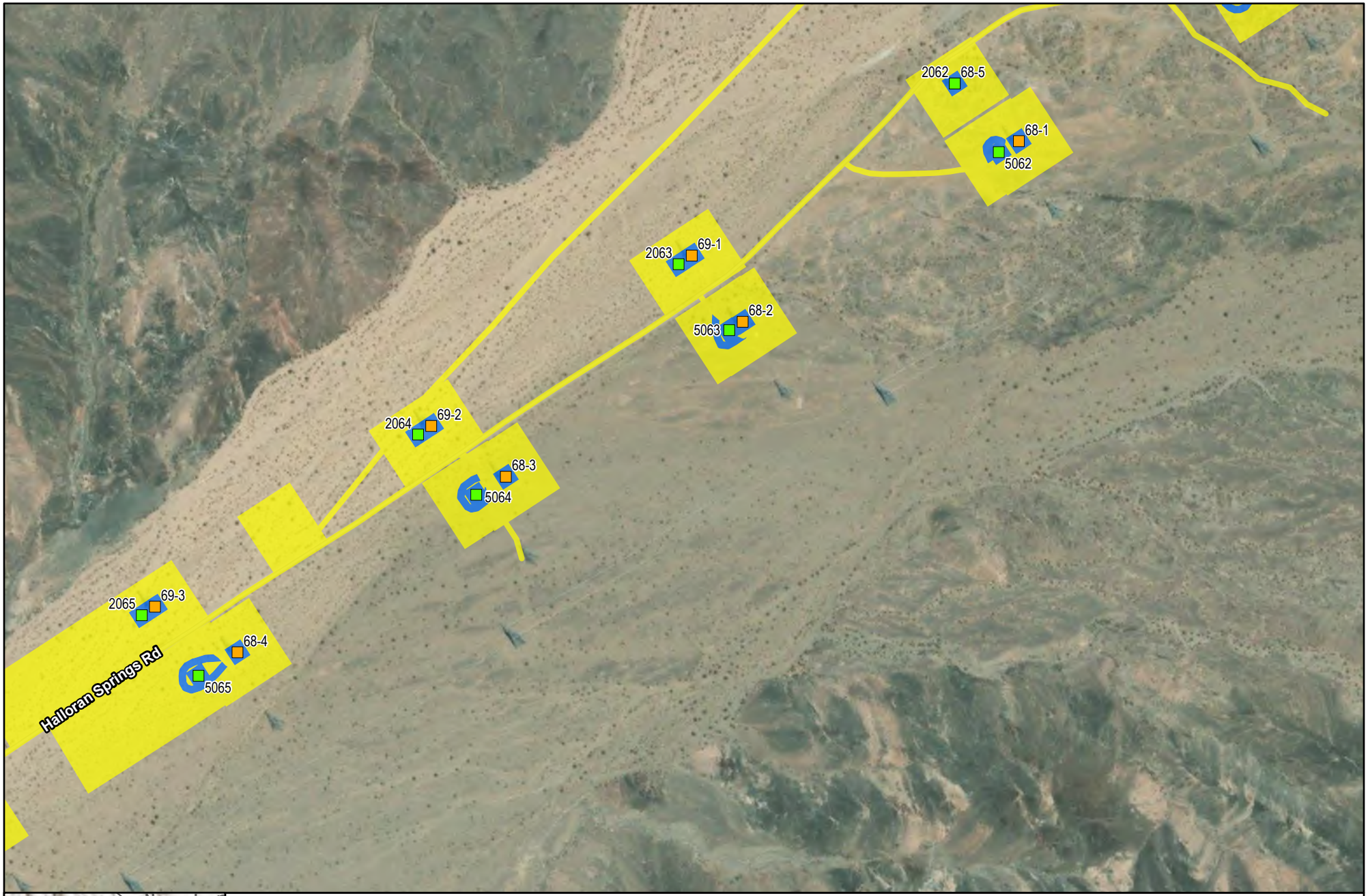

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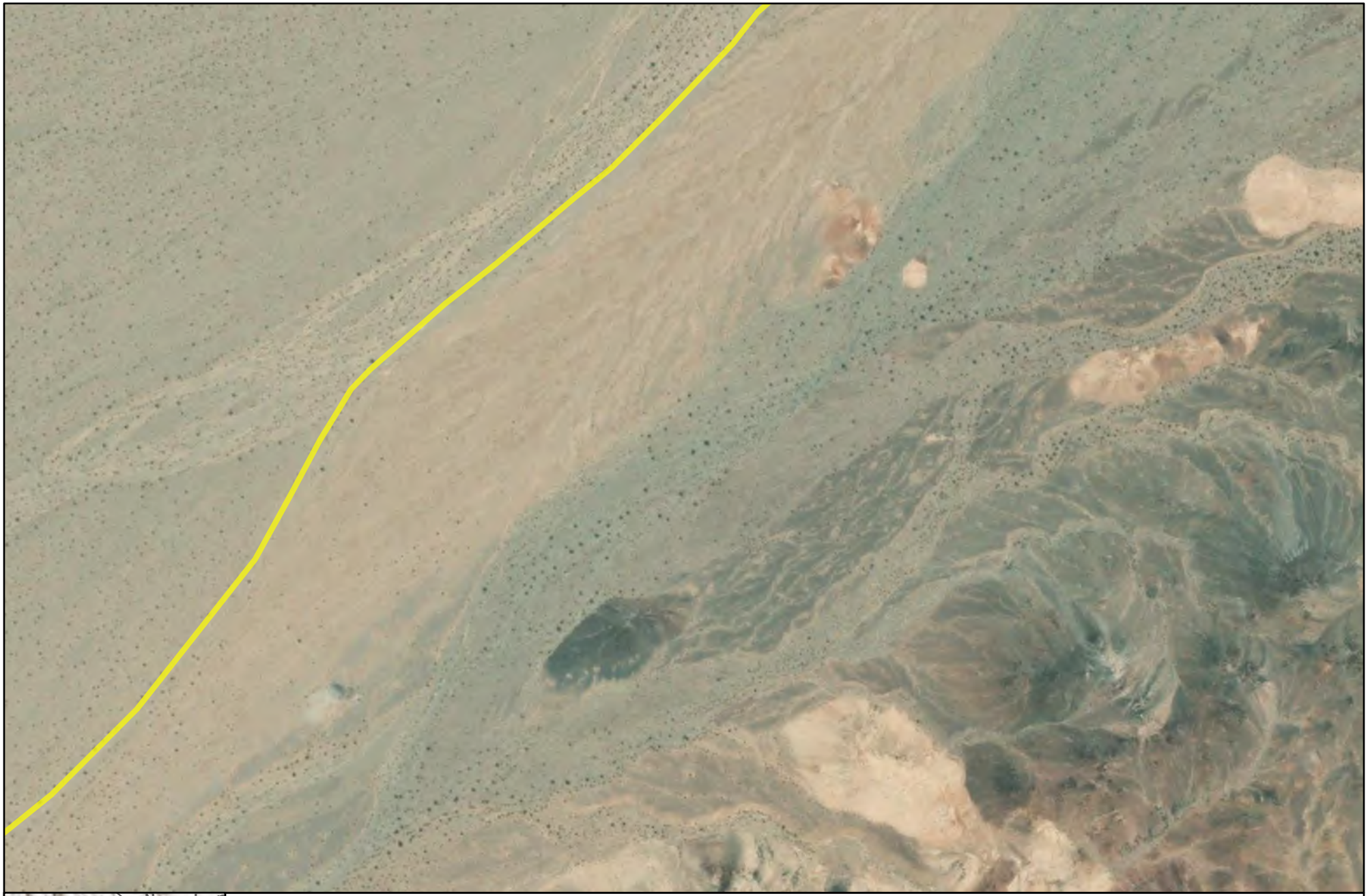

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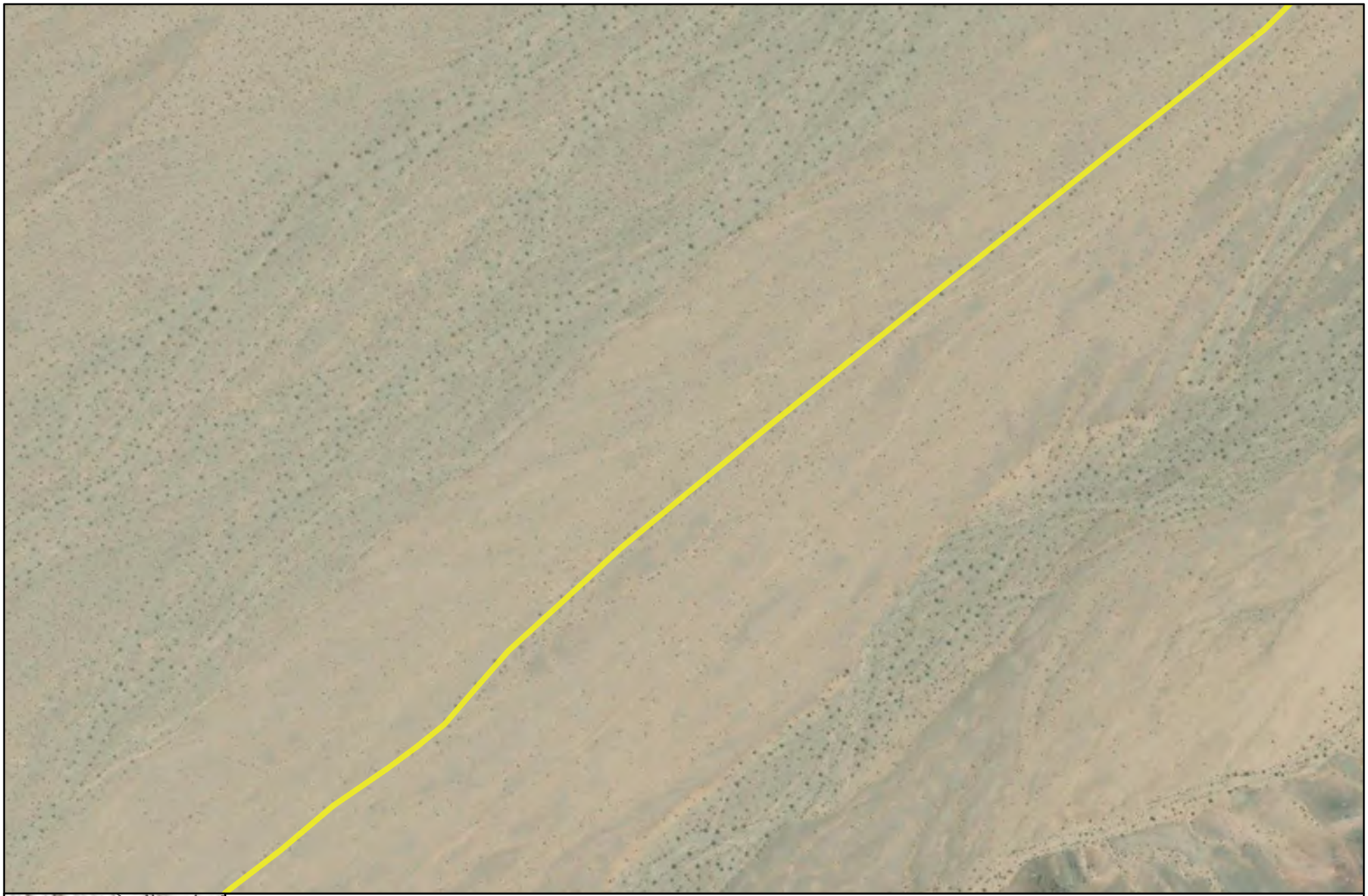

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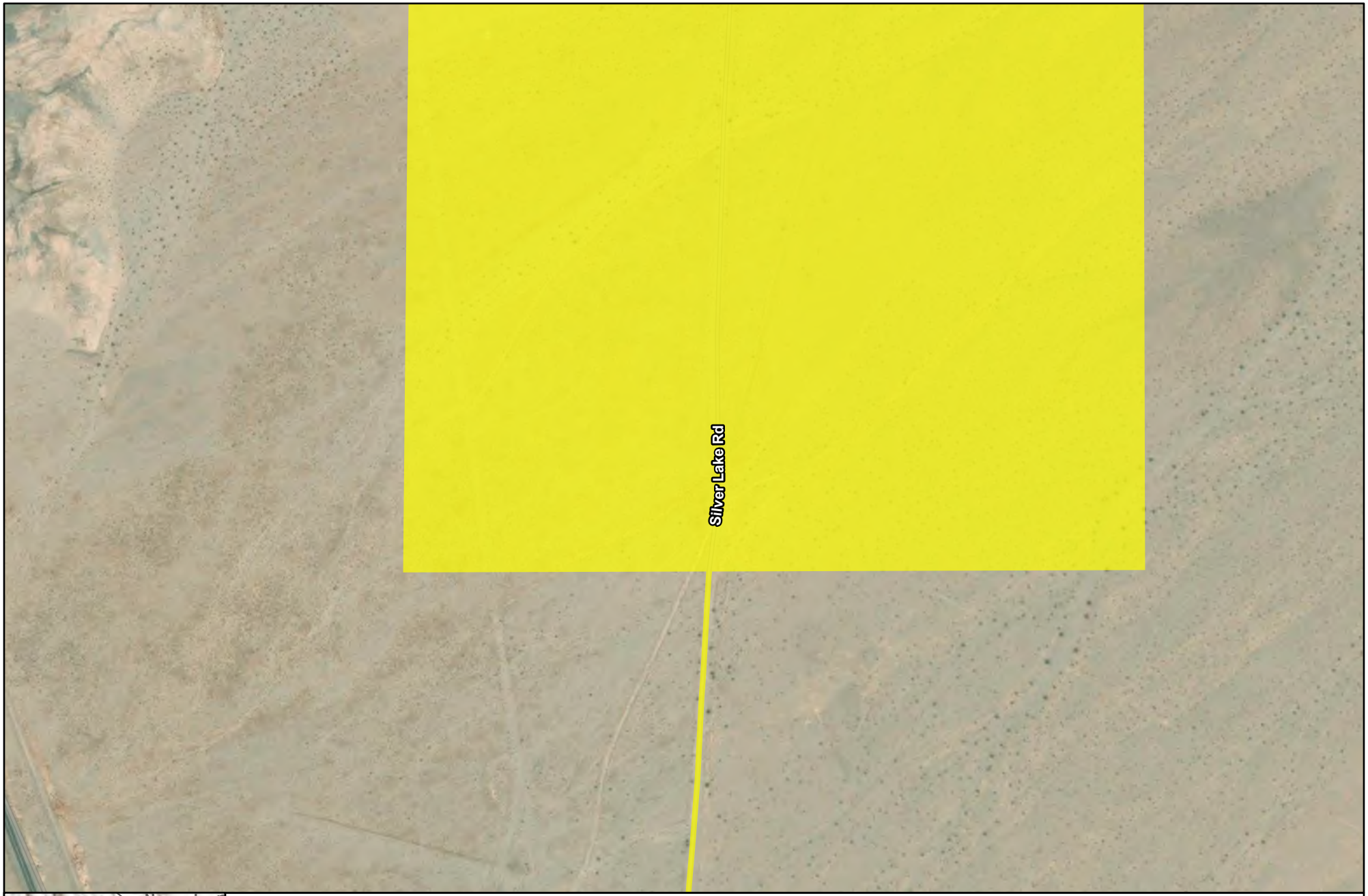

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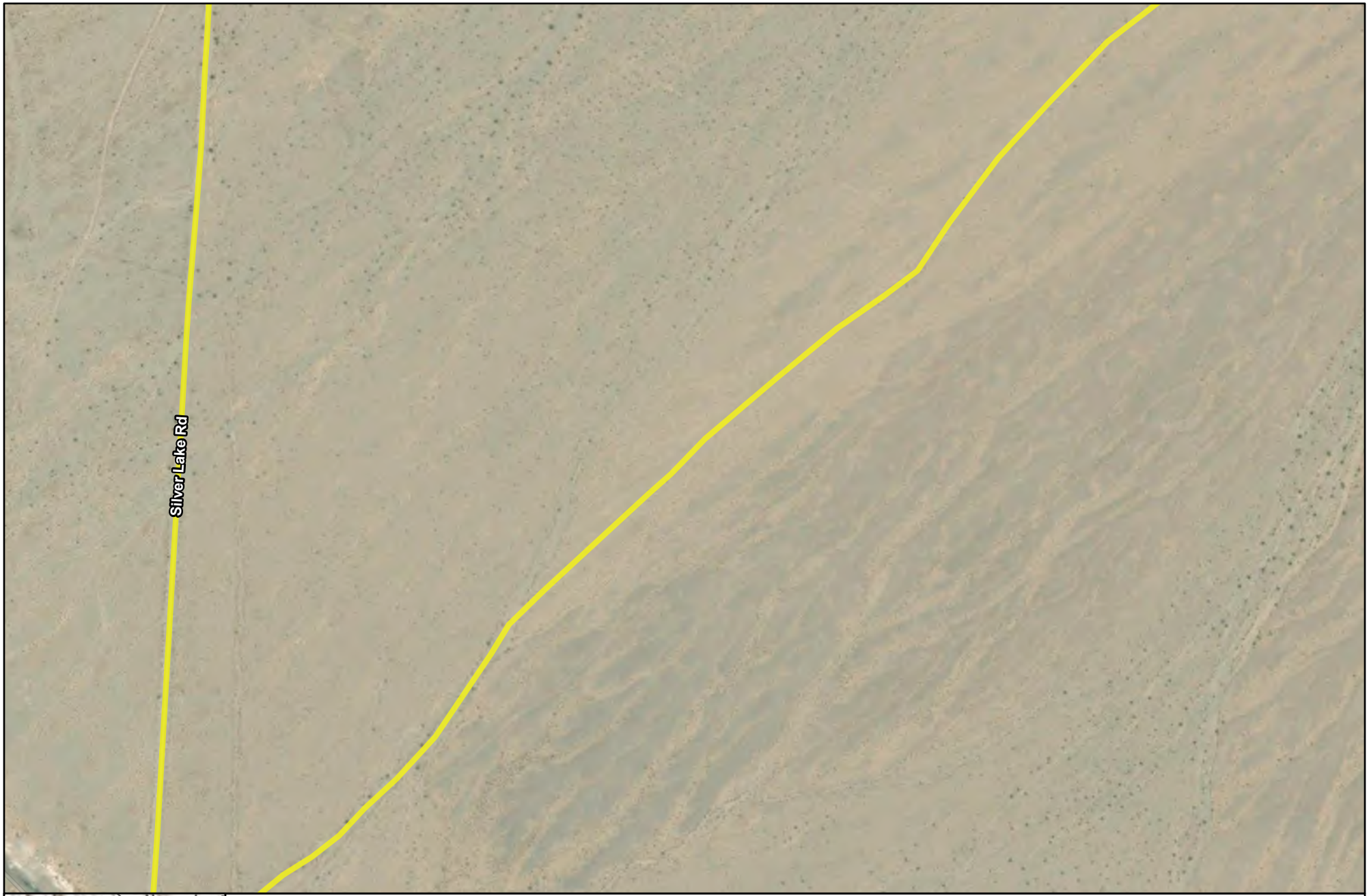

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LA DWP

N

0 500 Feet

Temporary Impact

FIGURE 3
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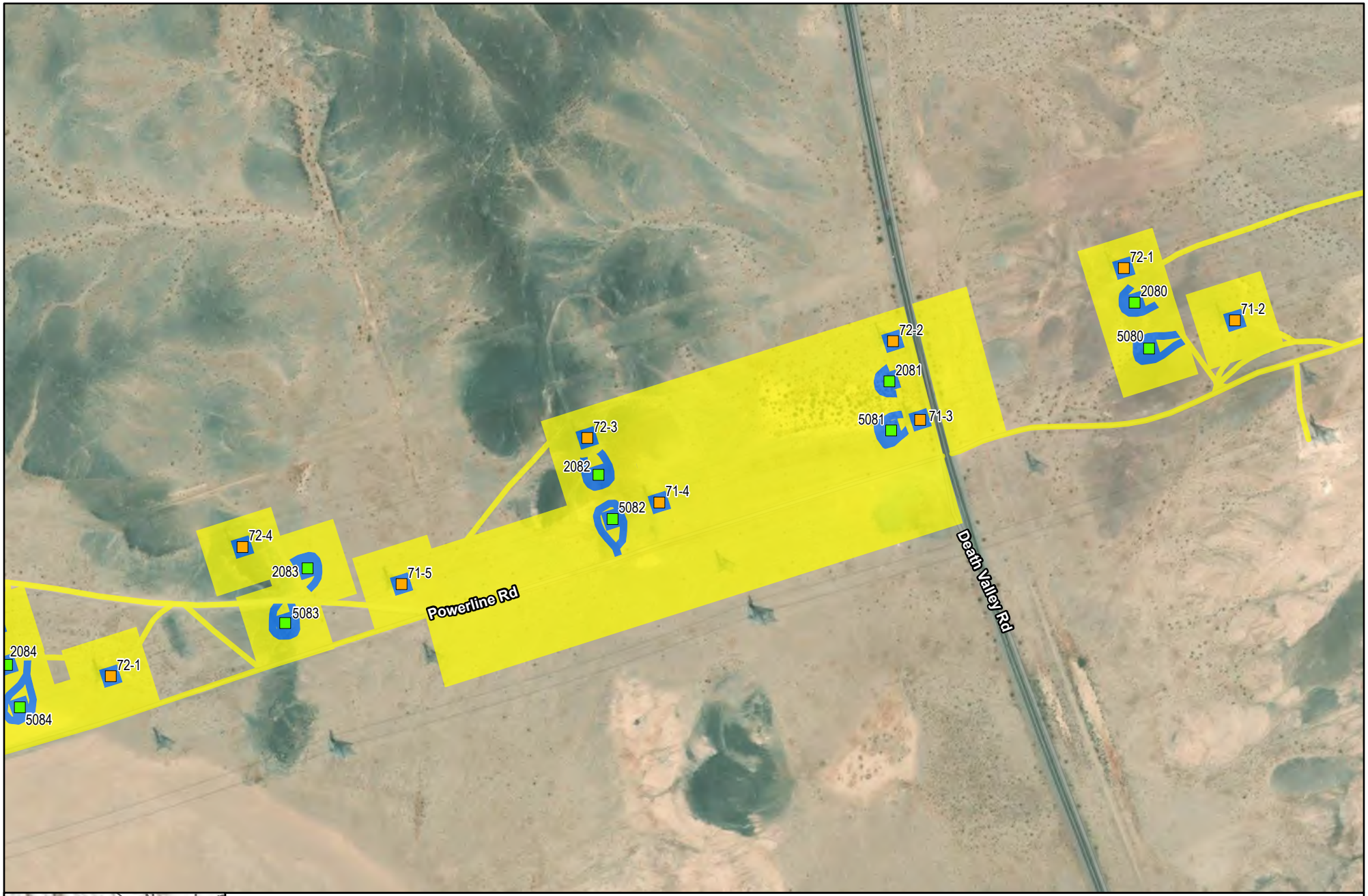

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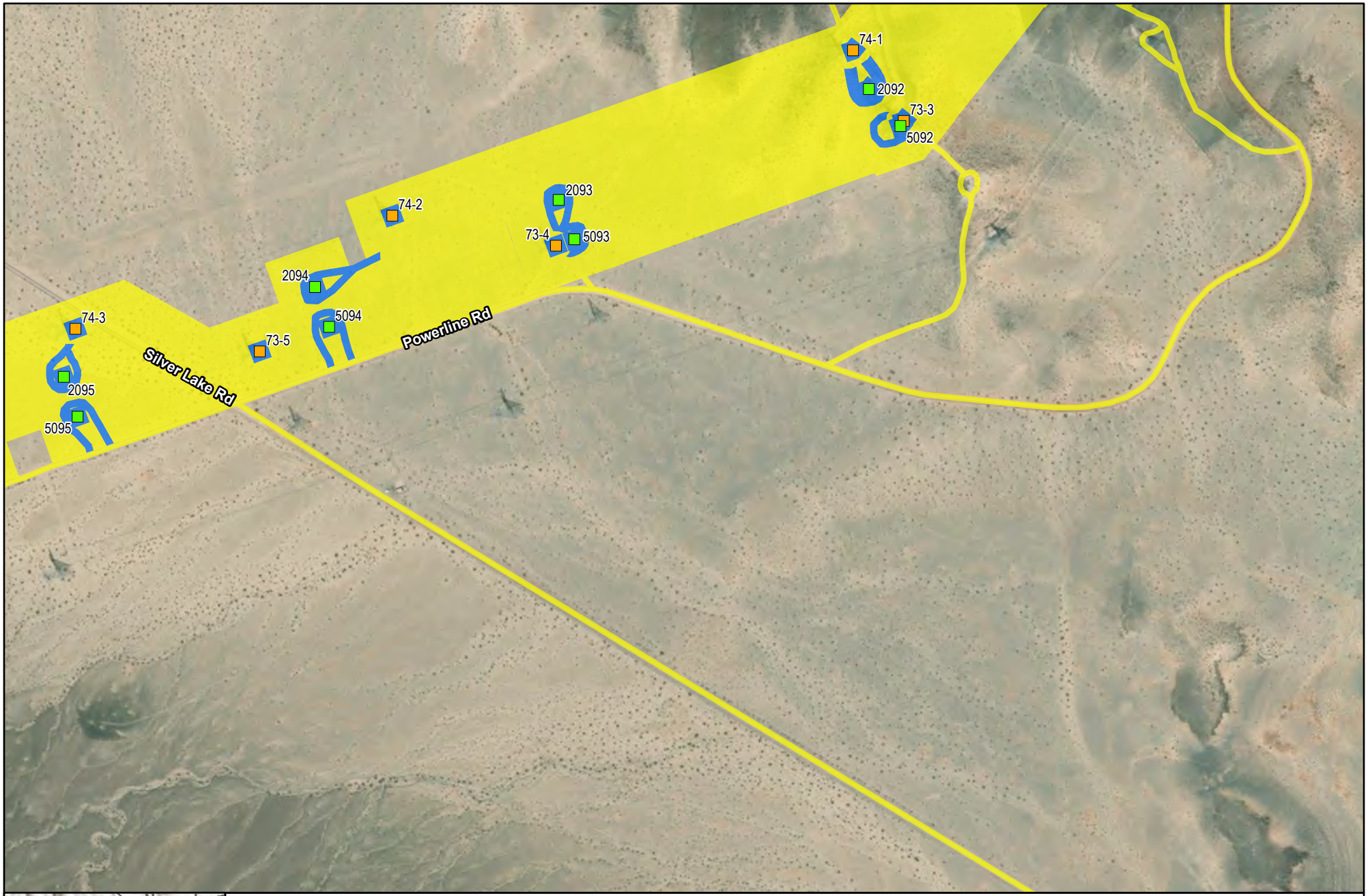

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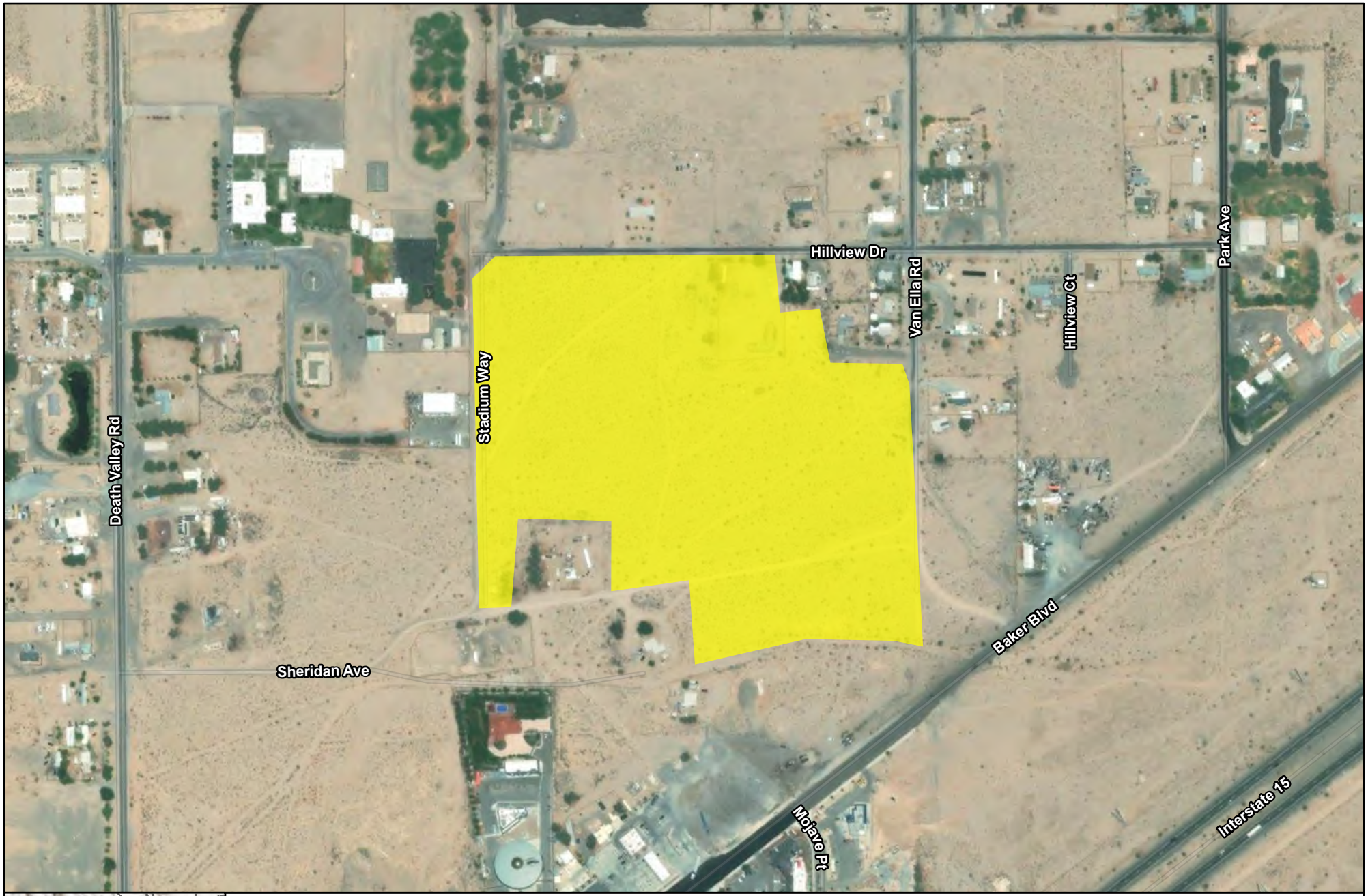

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LA DWP

N

Temporary Impact

0 500 Feet

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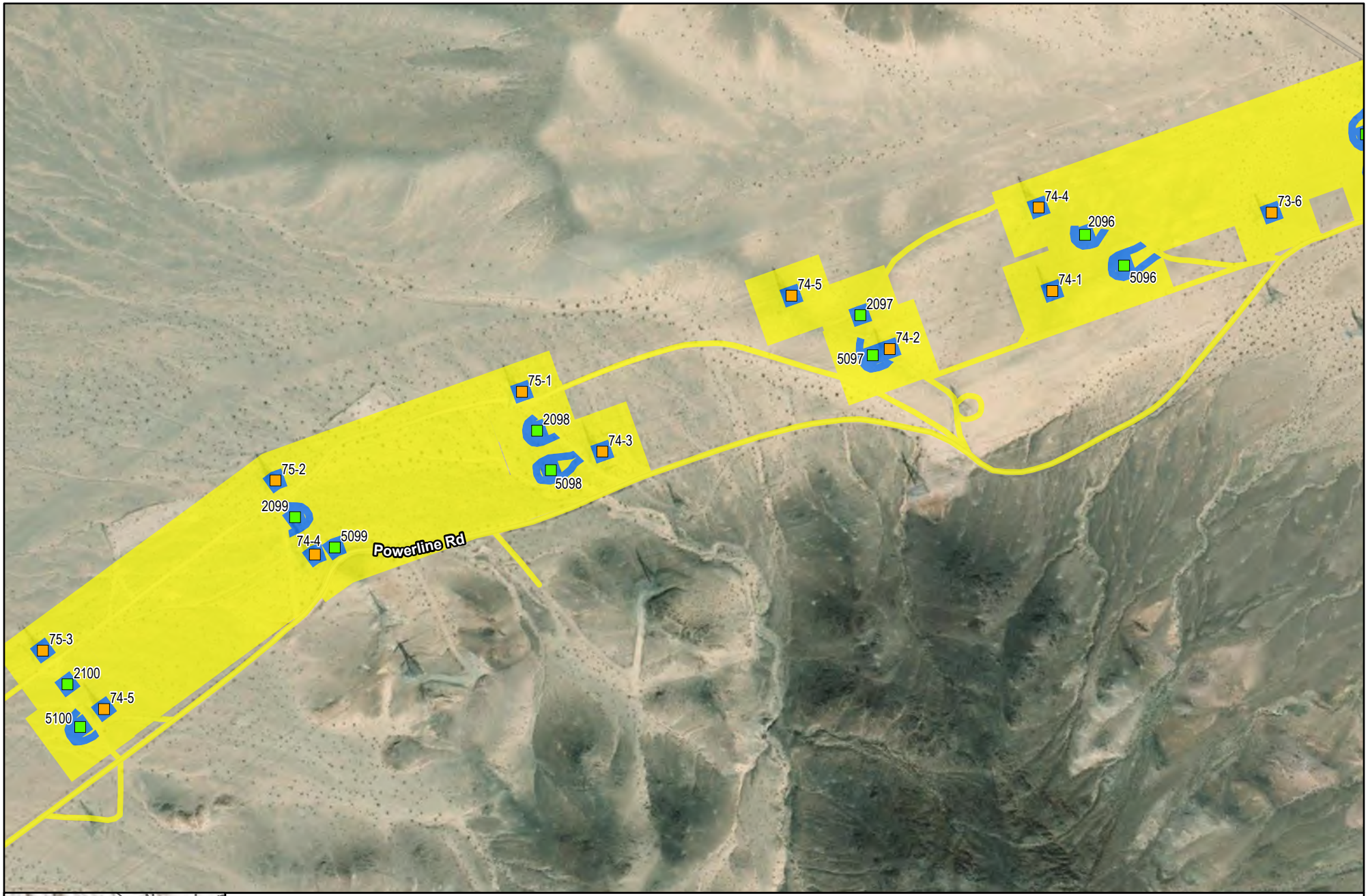

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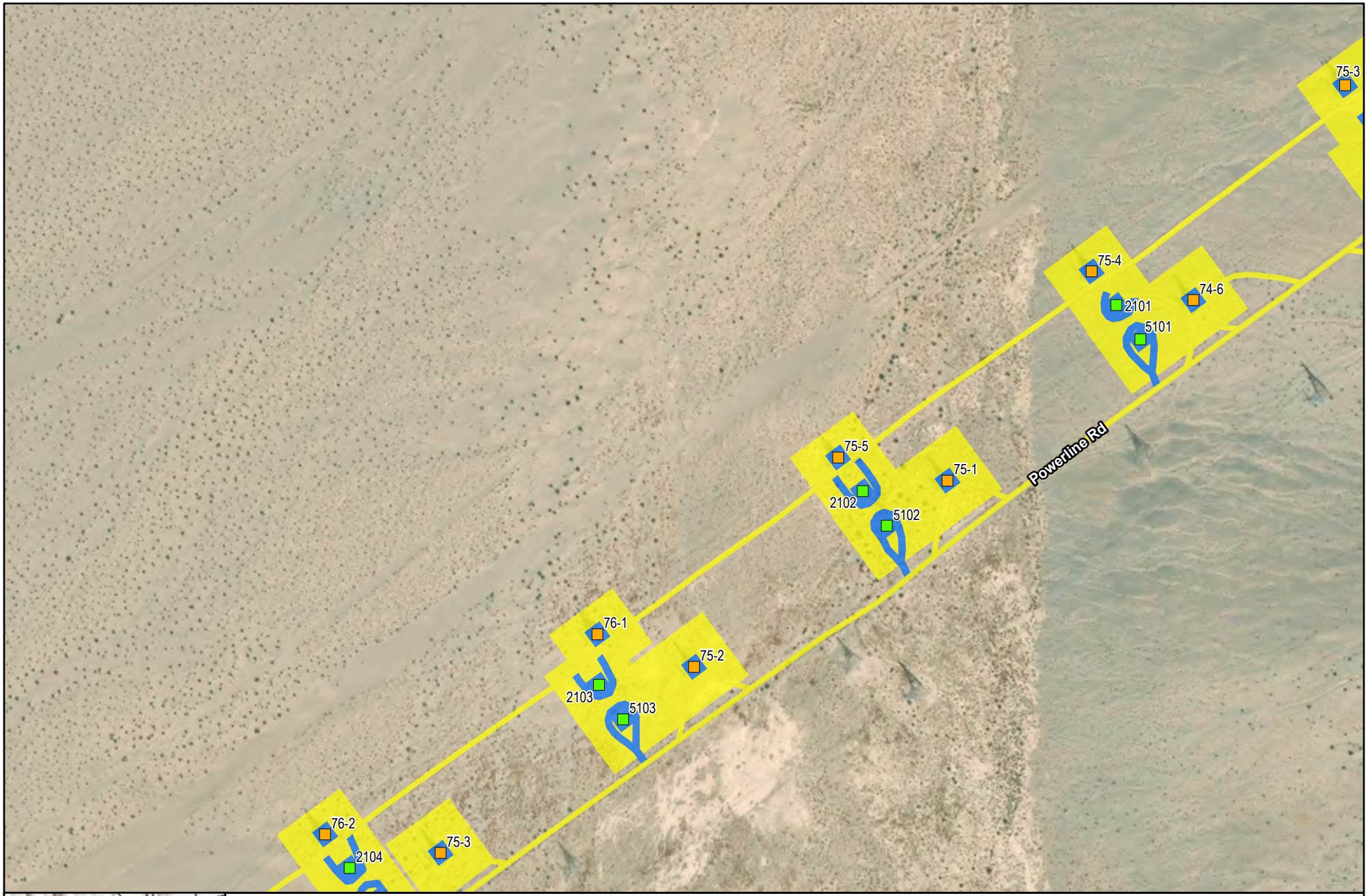

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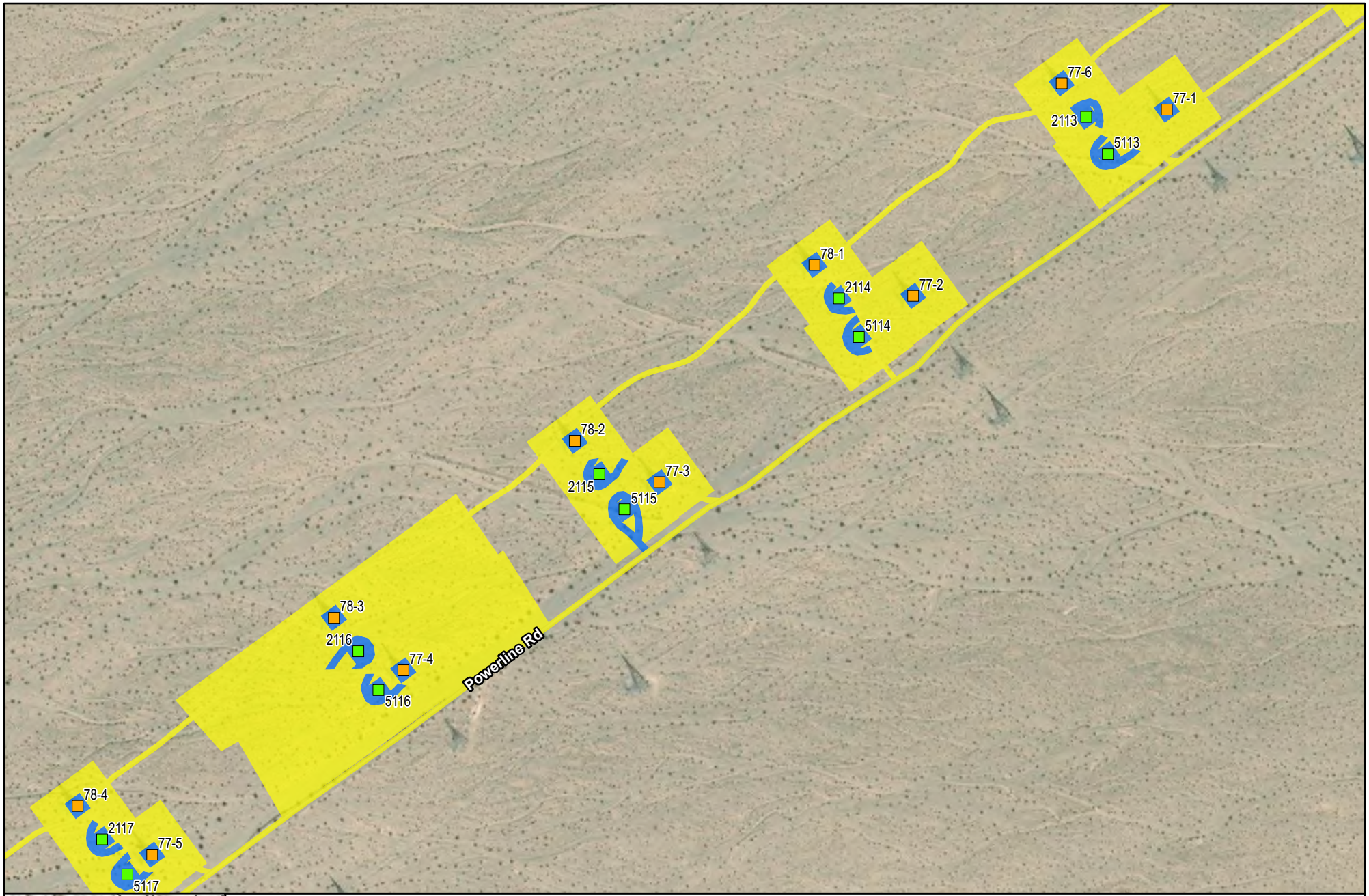

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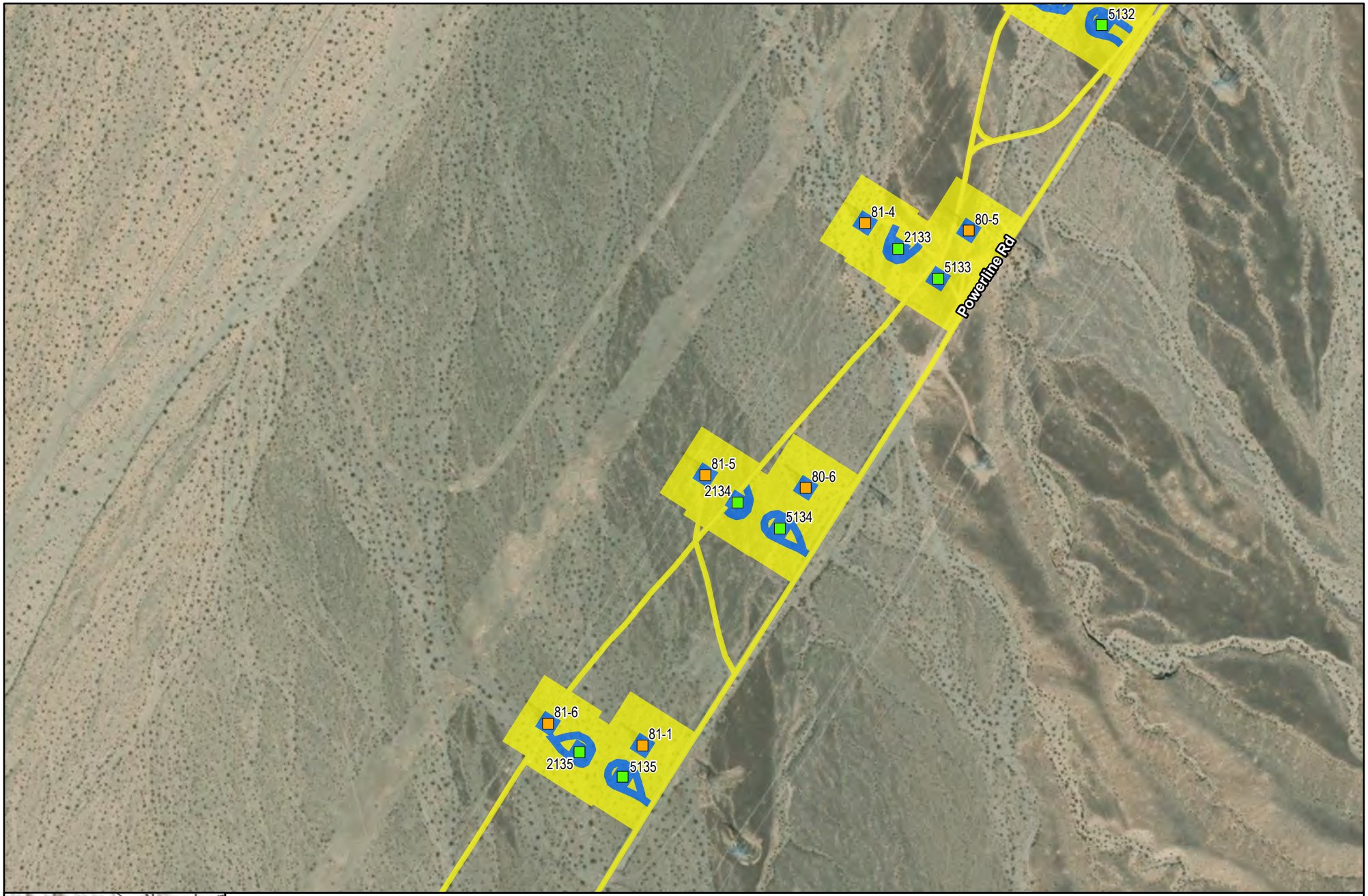

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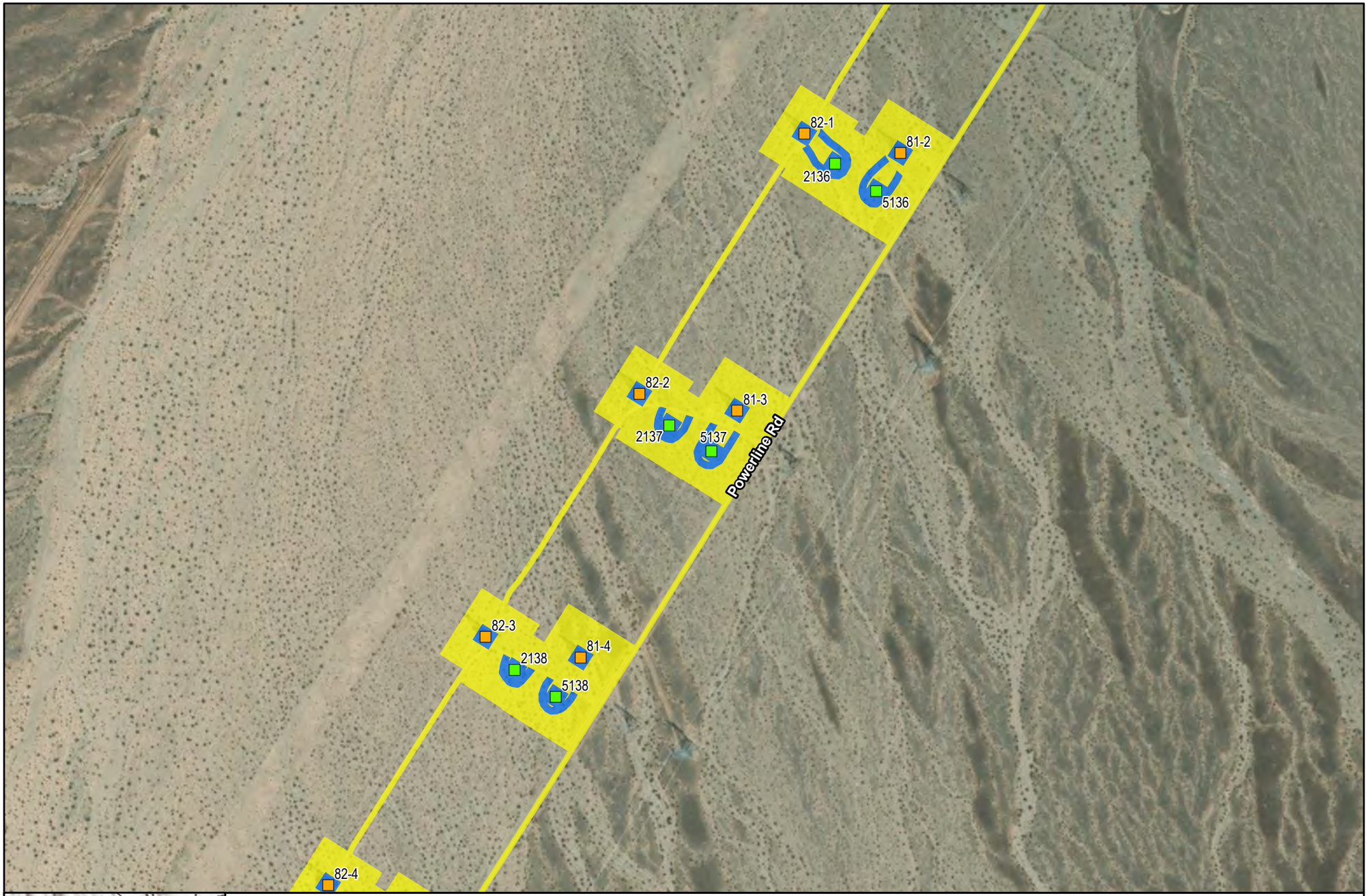

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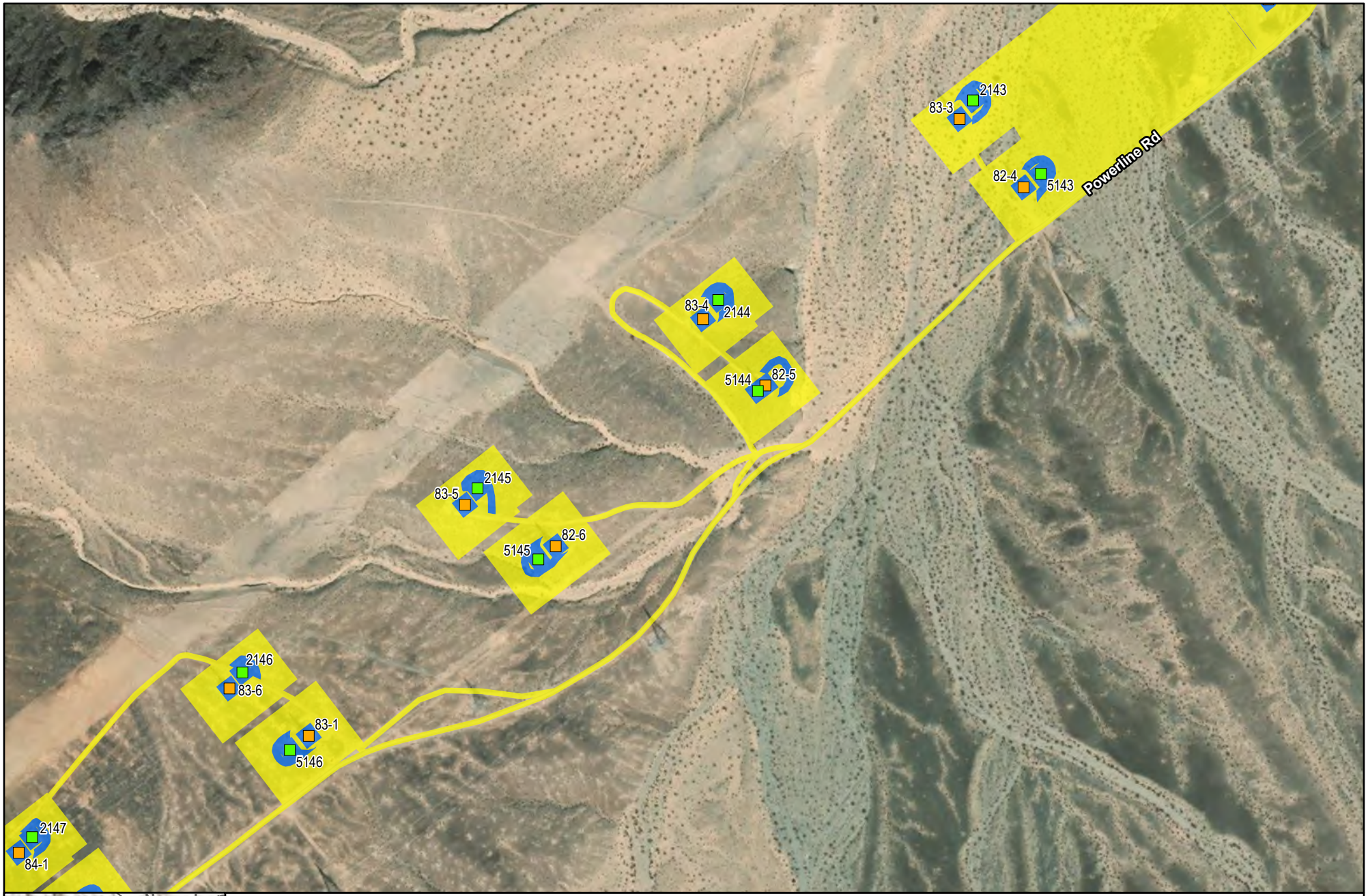

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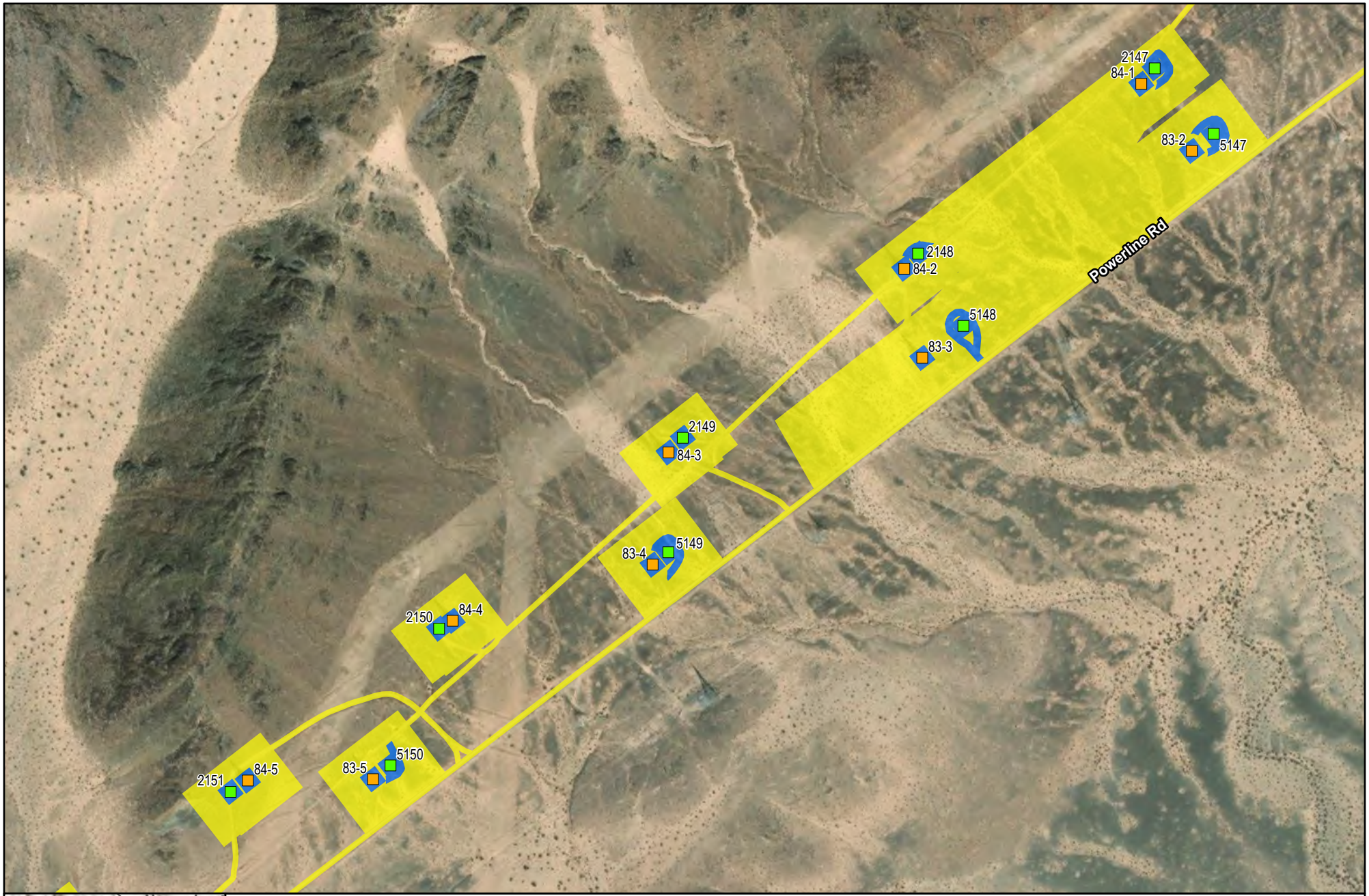

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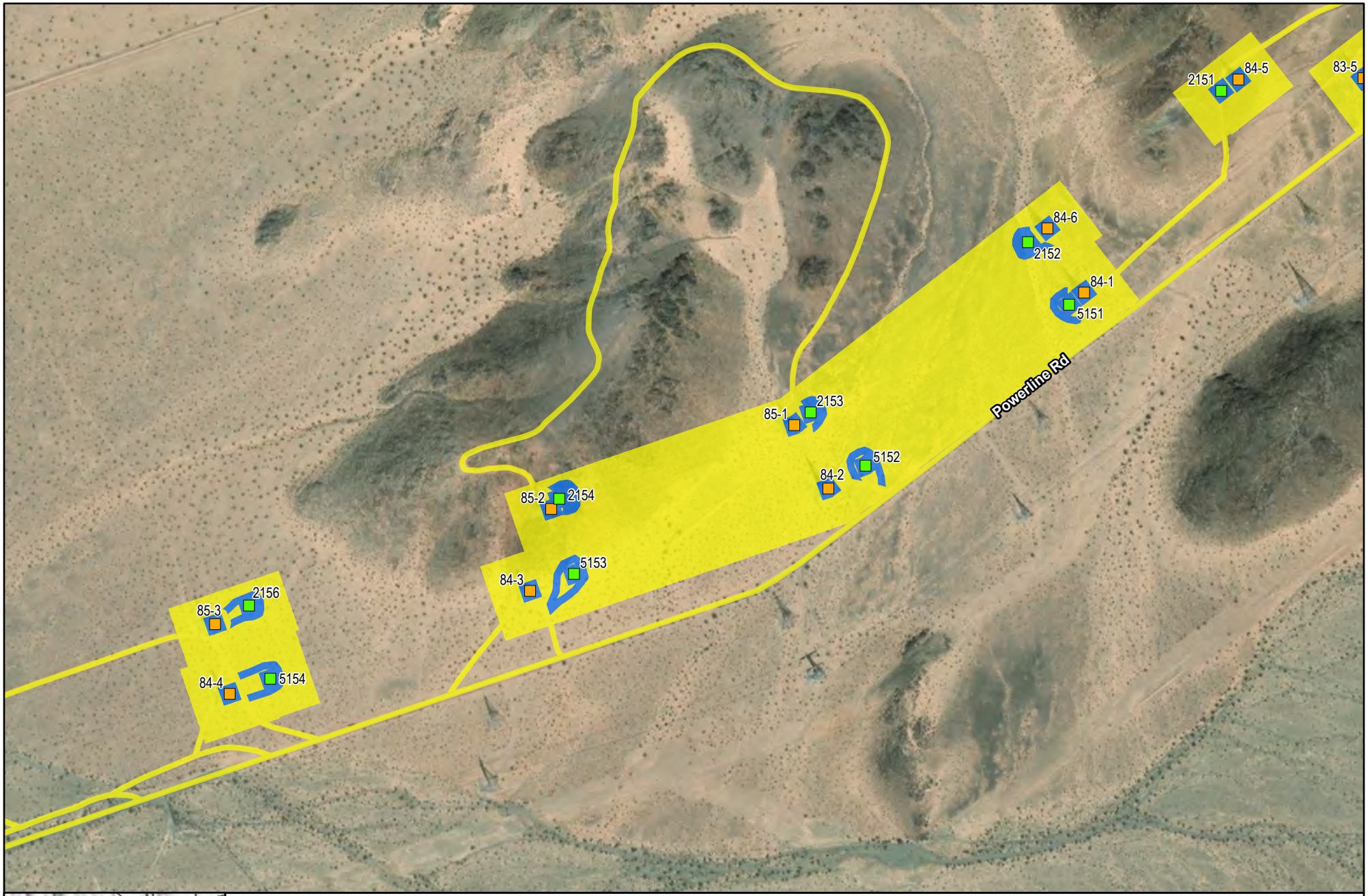

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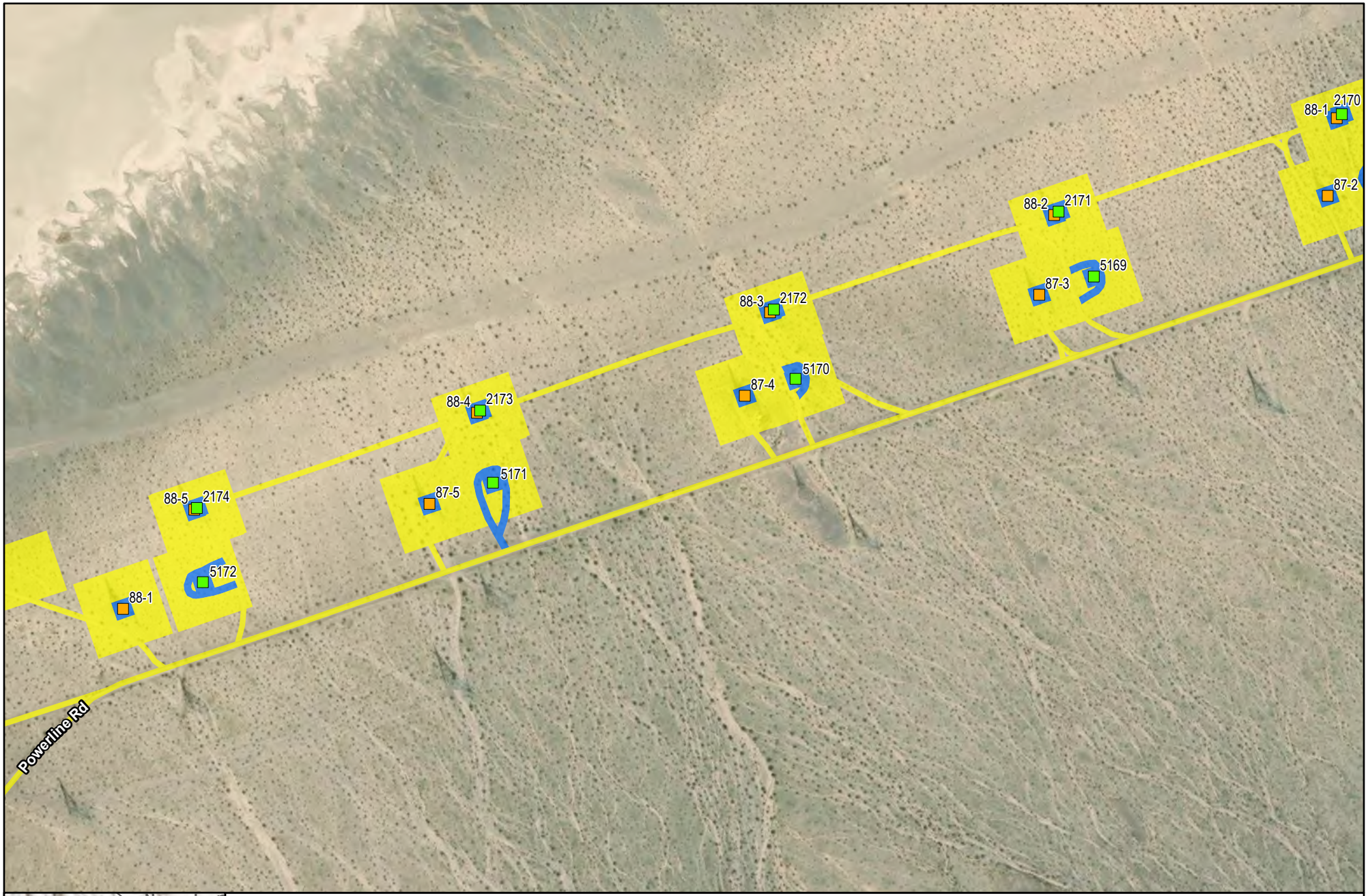

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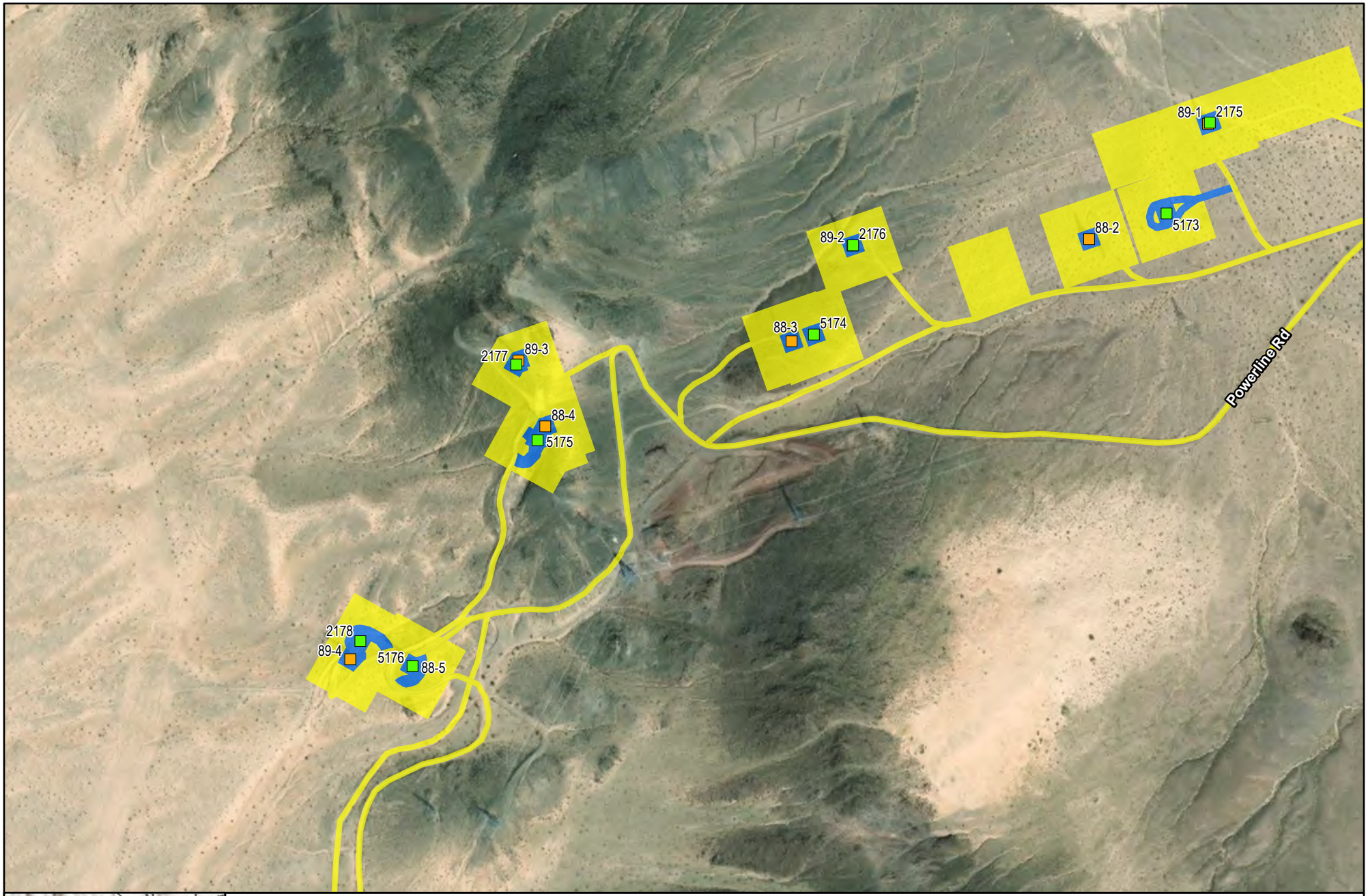

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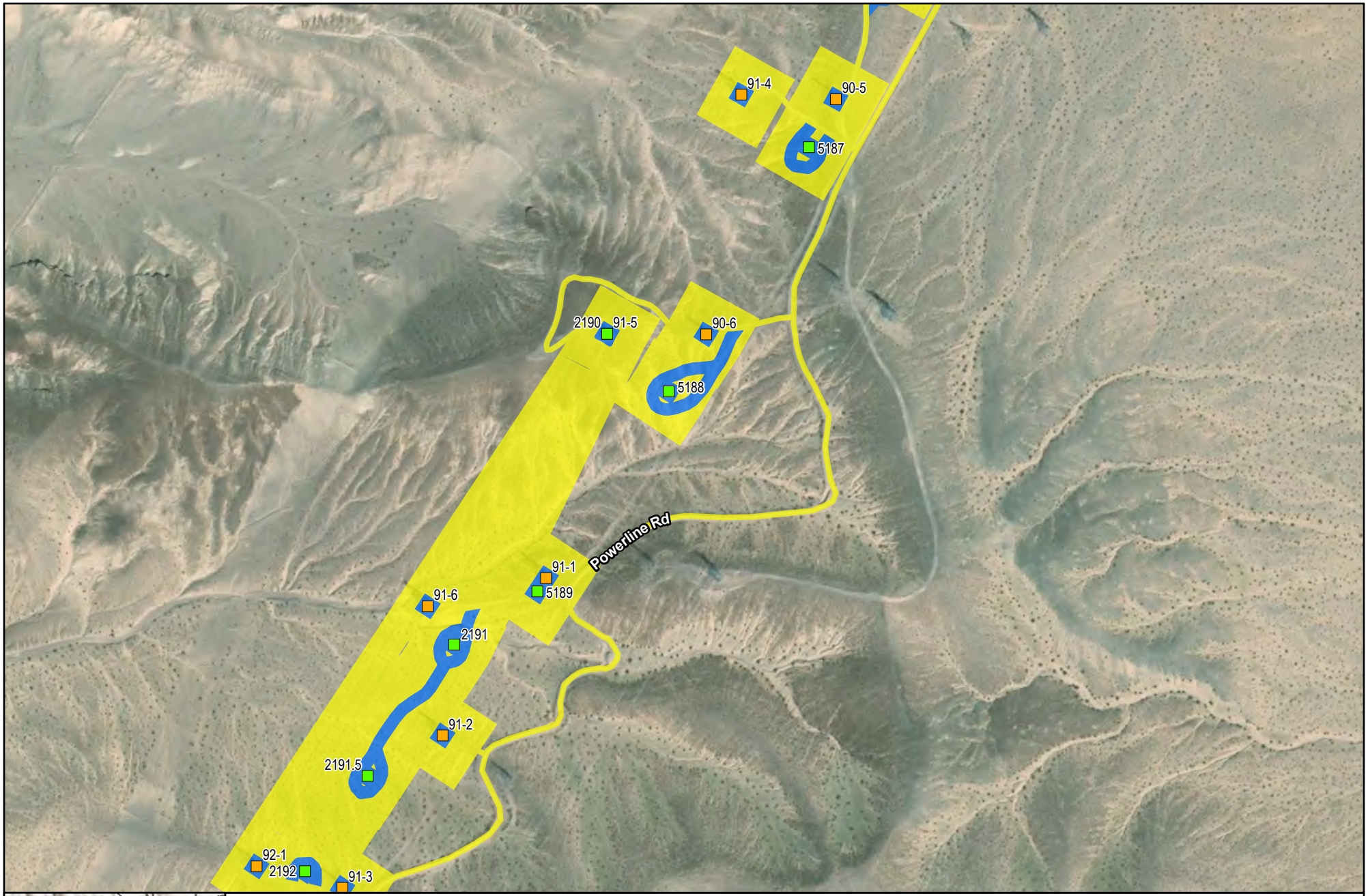

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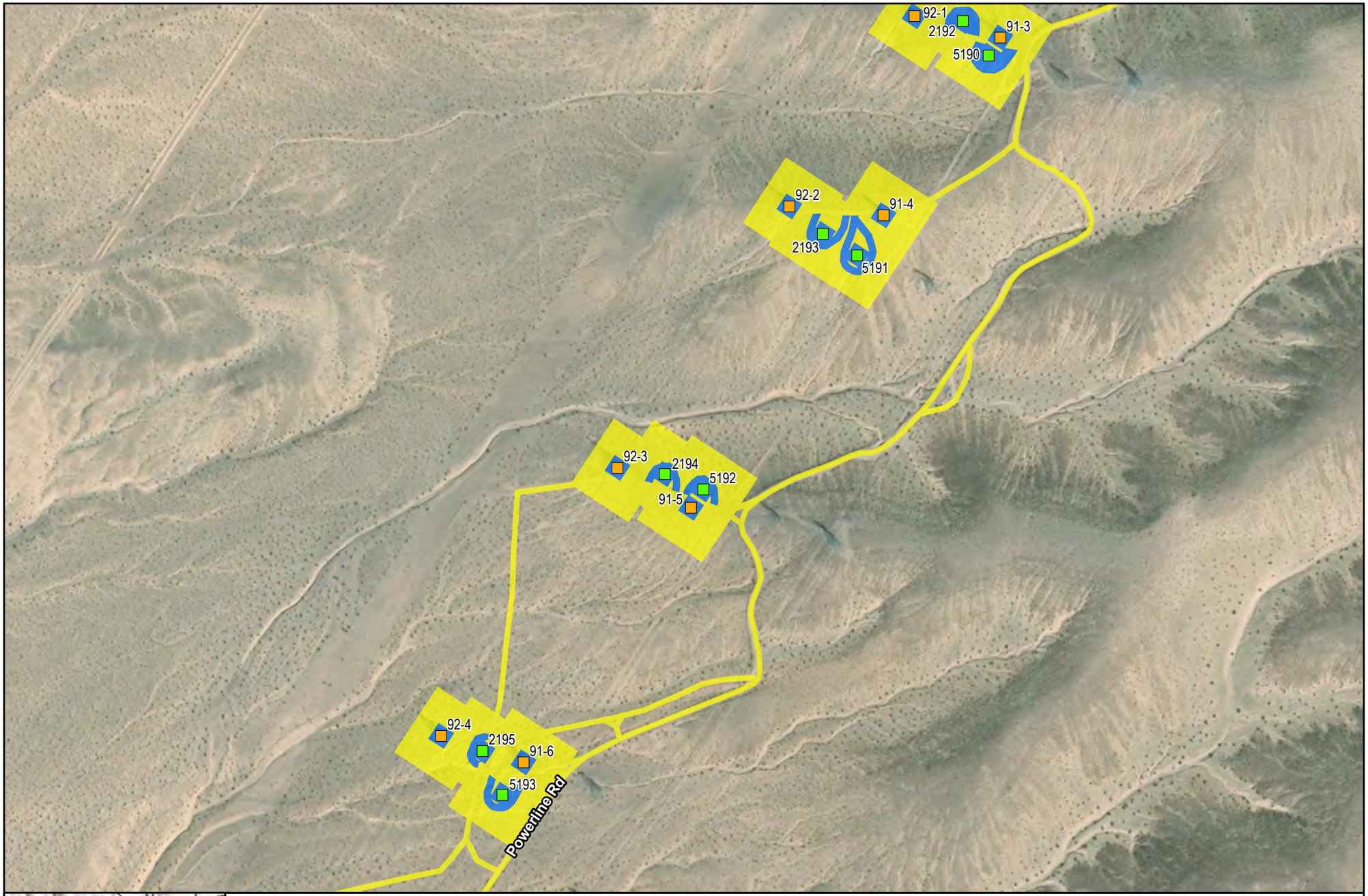

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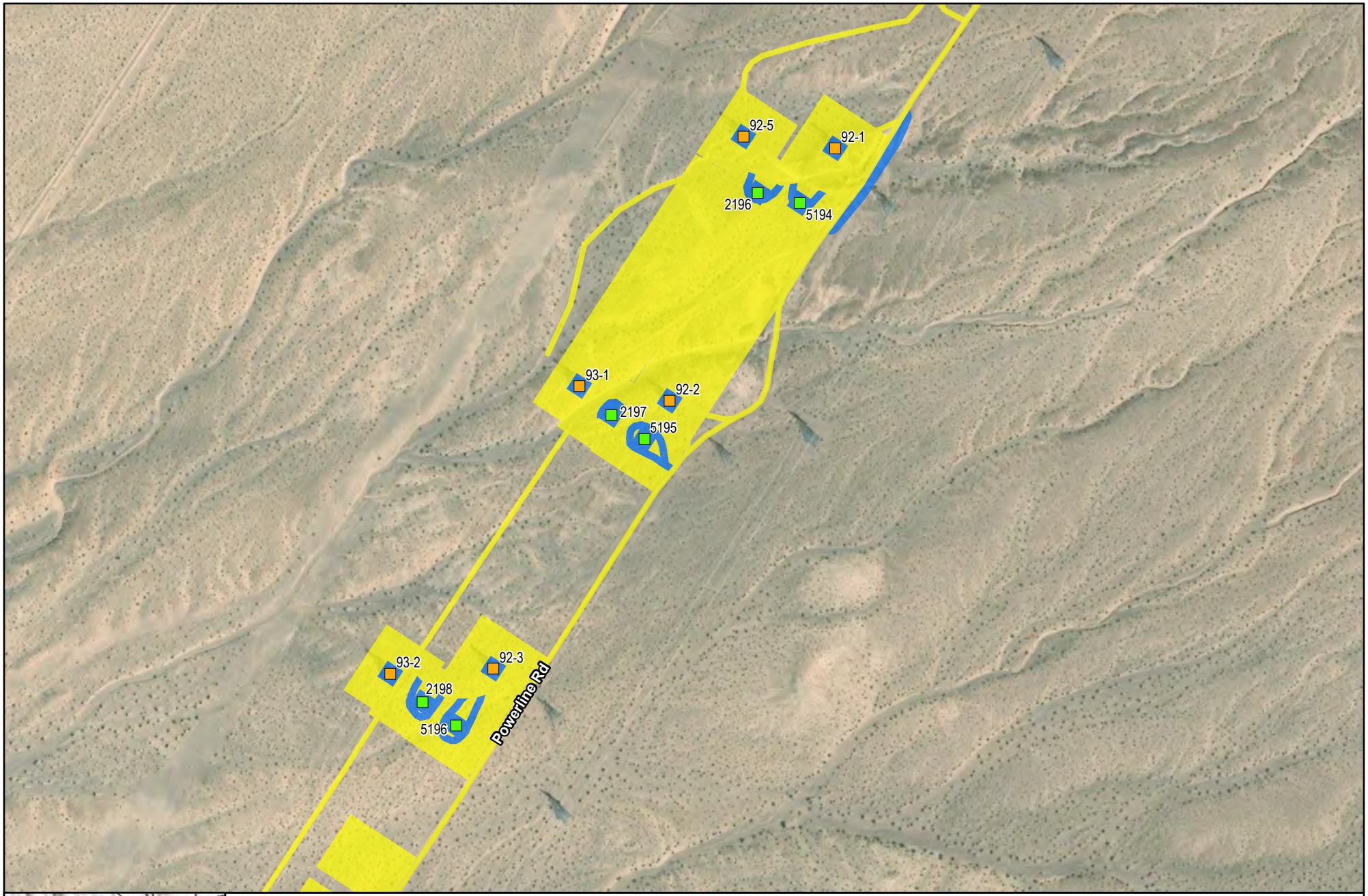

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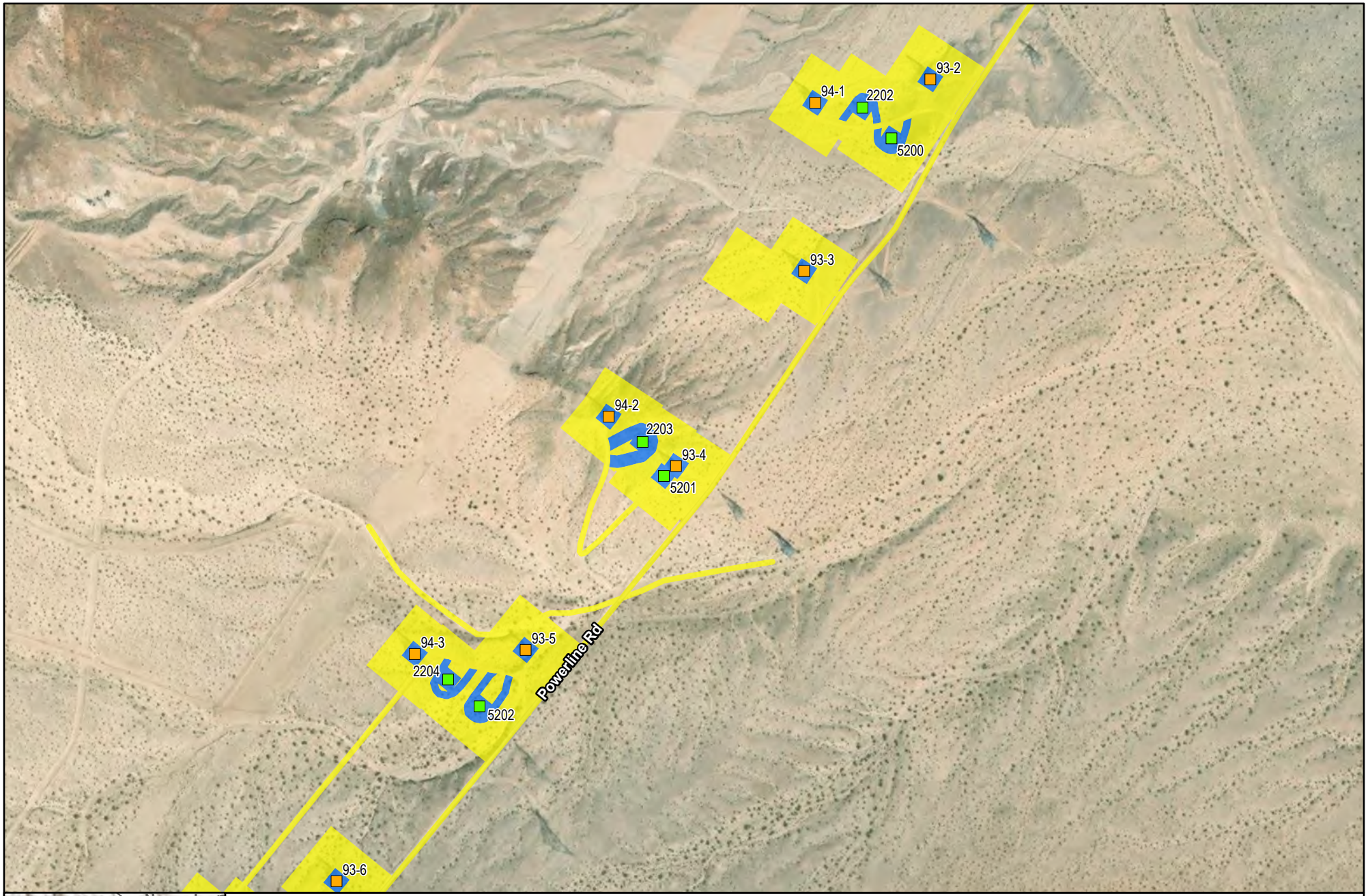

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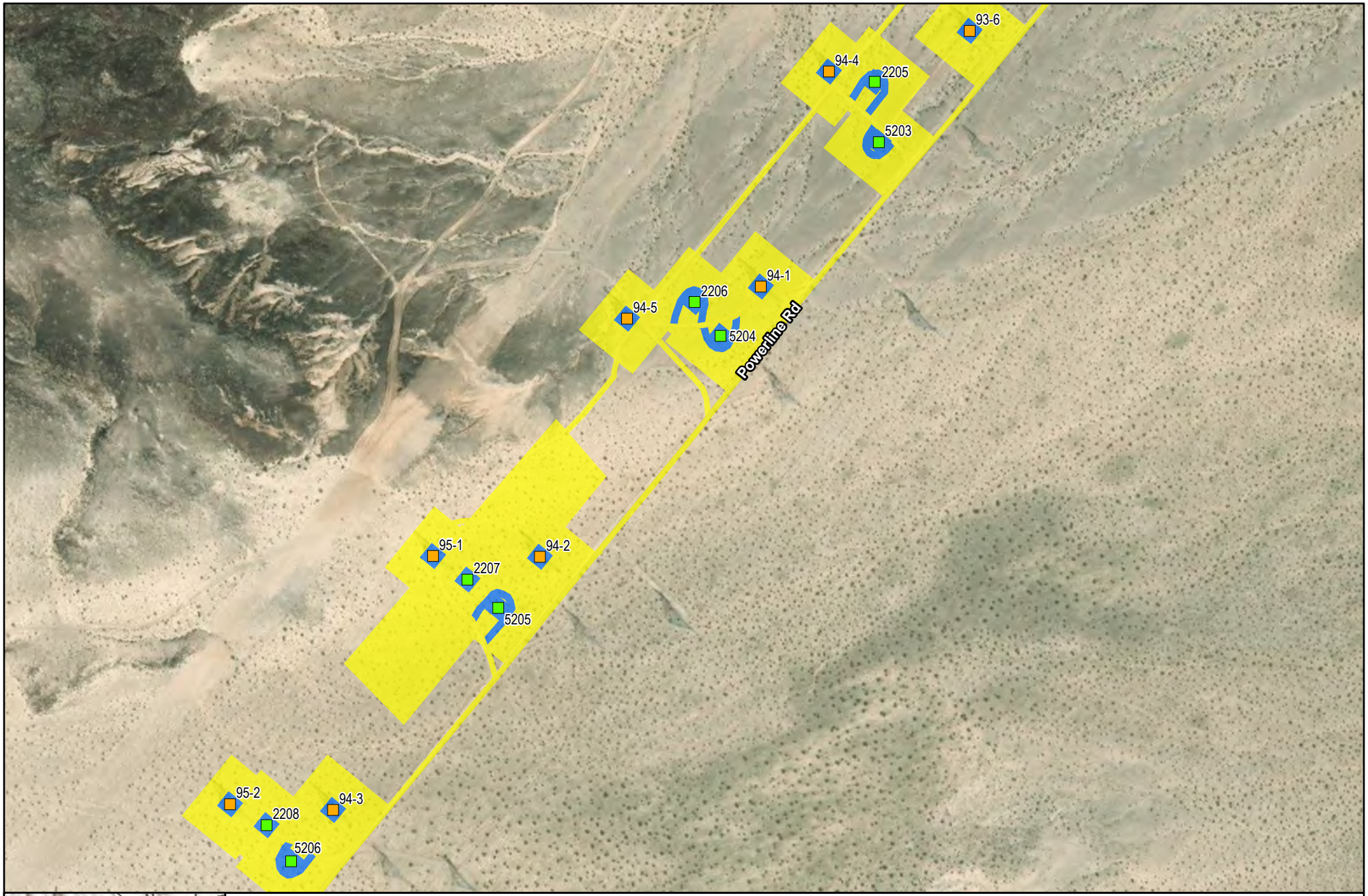

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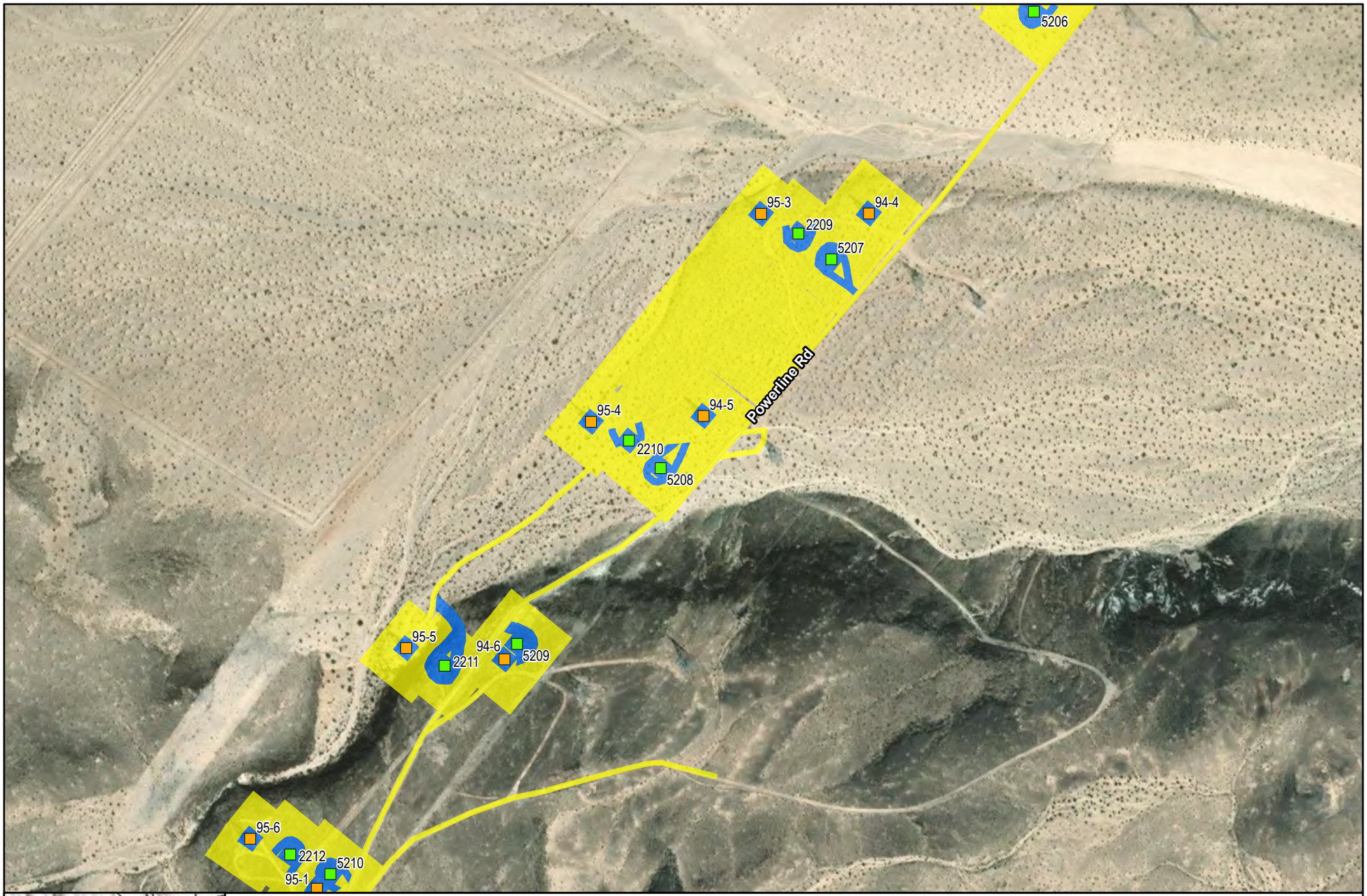

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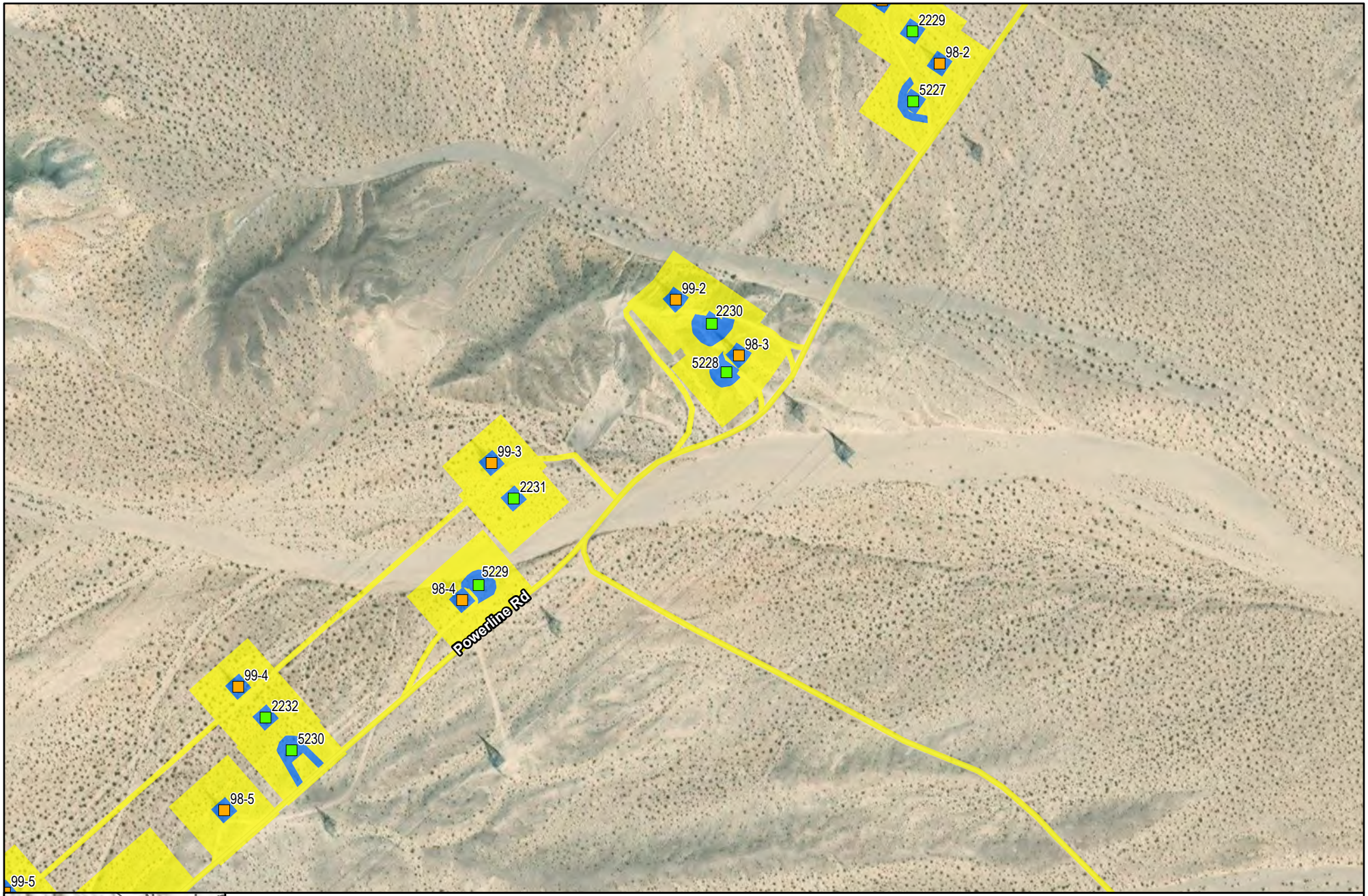

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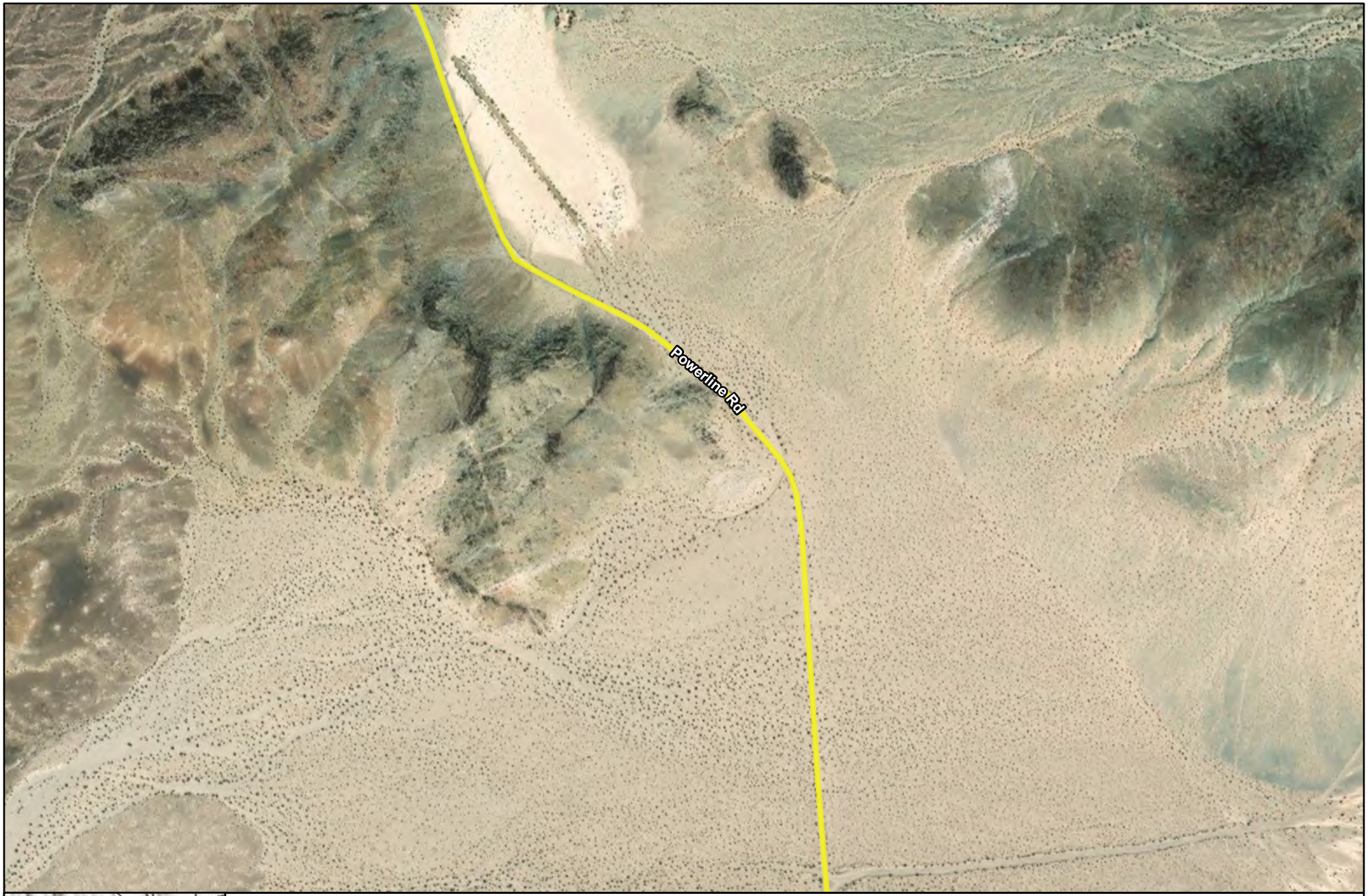

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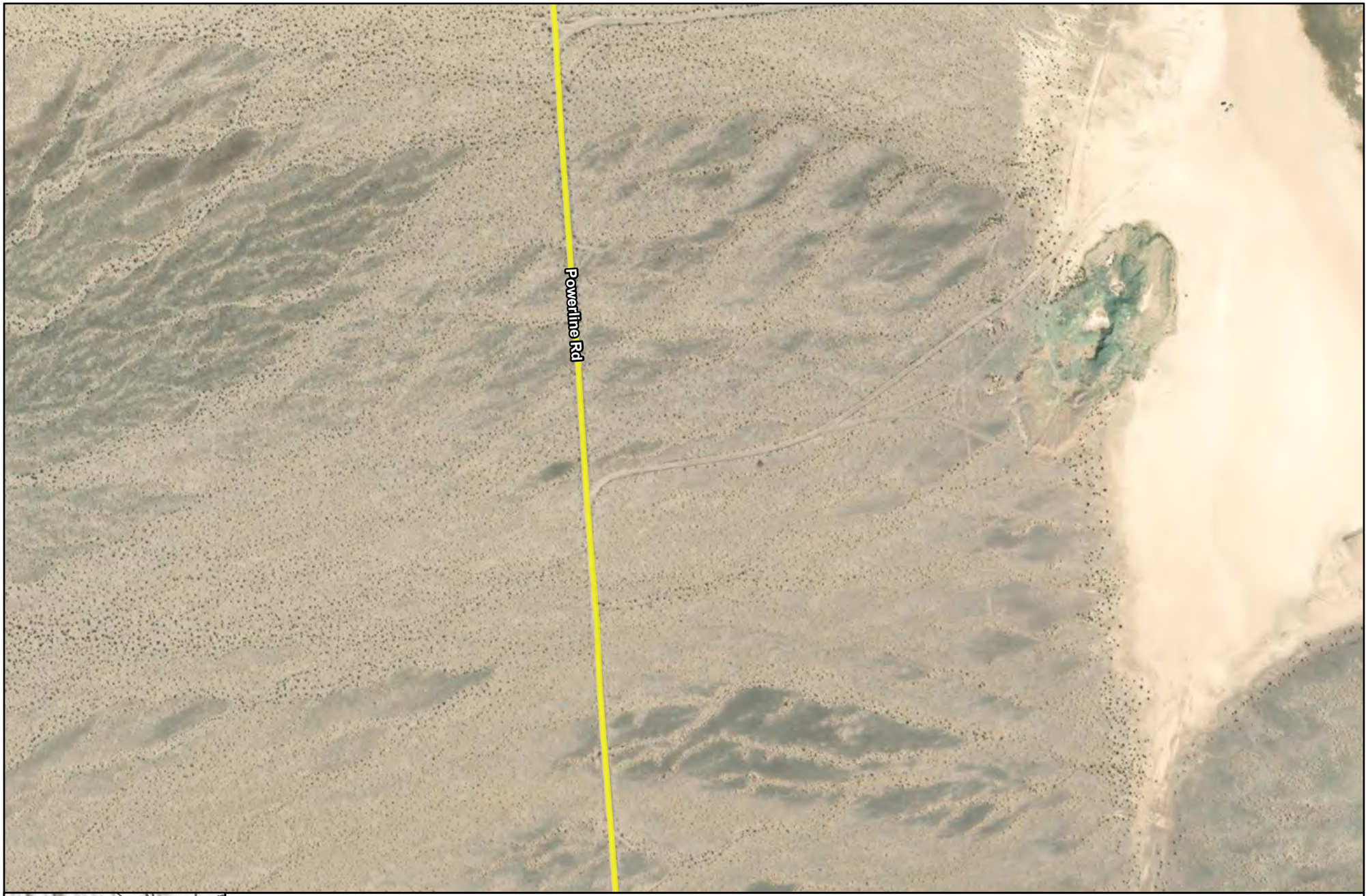

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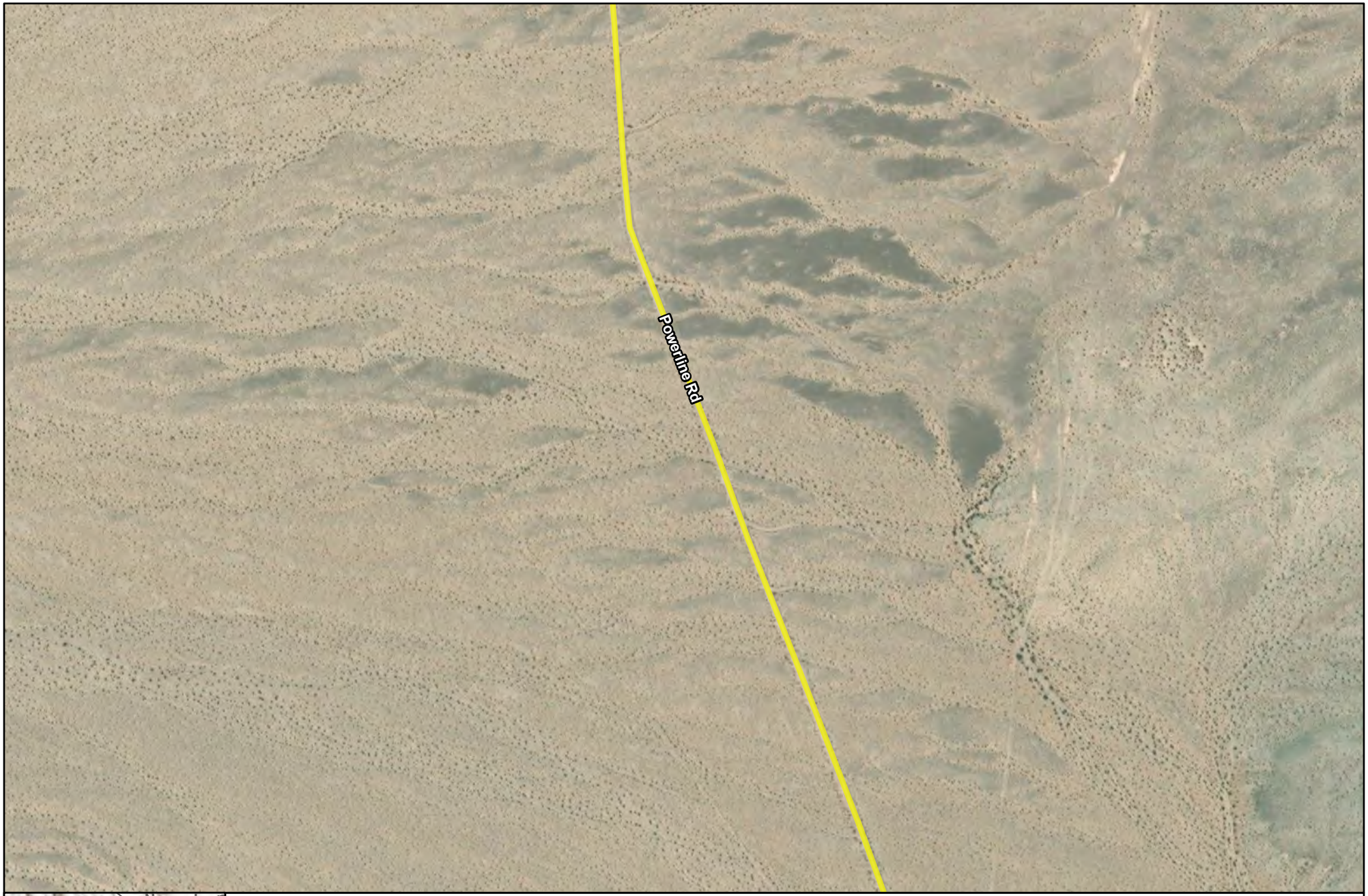

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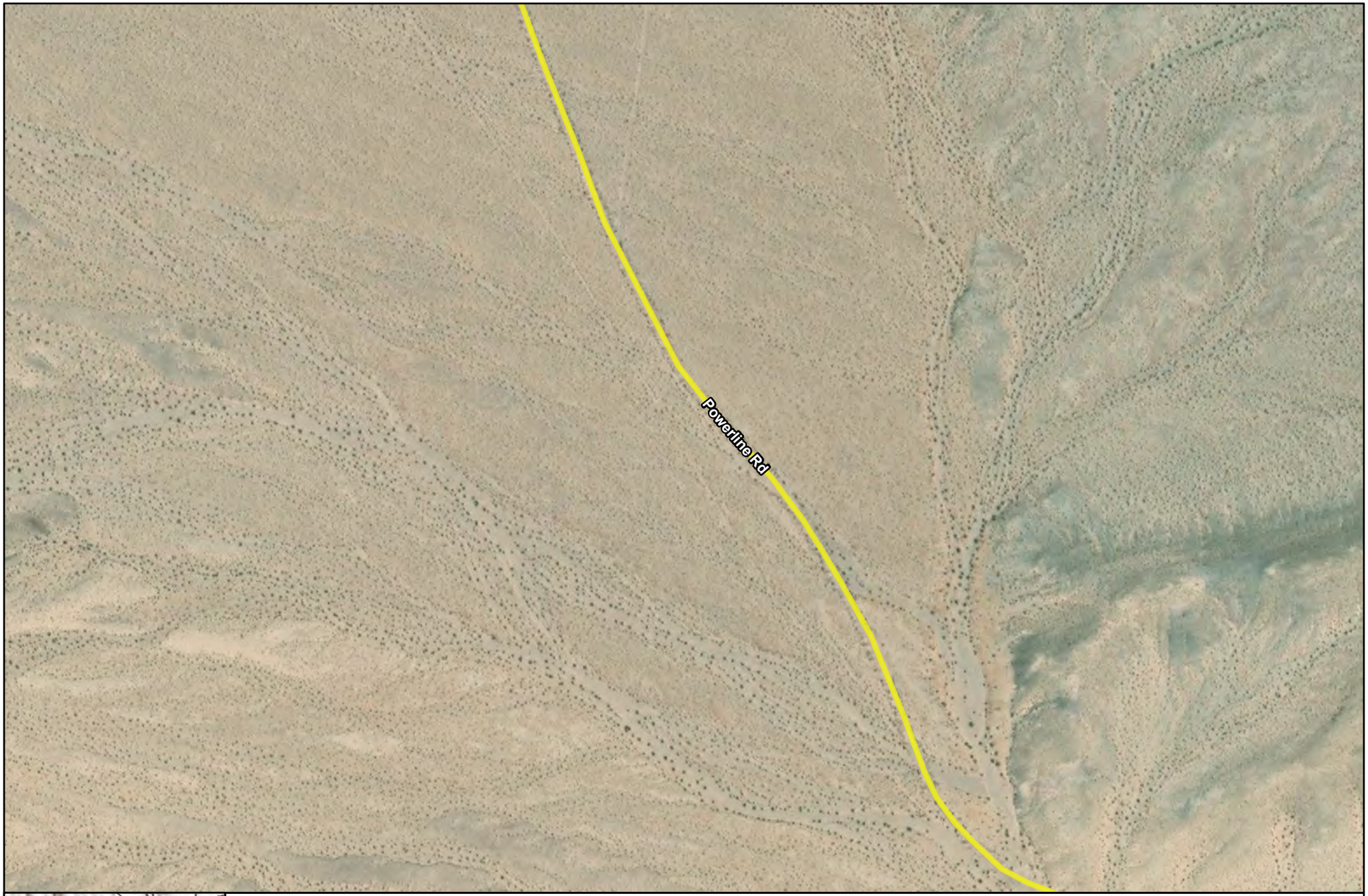

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LA DWP

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Temporary Impact

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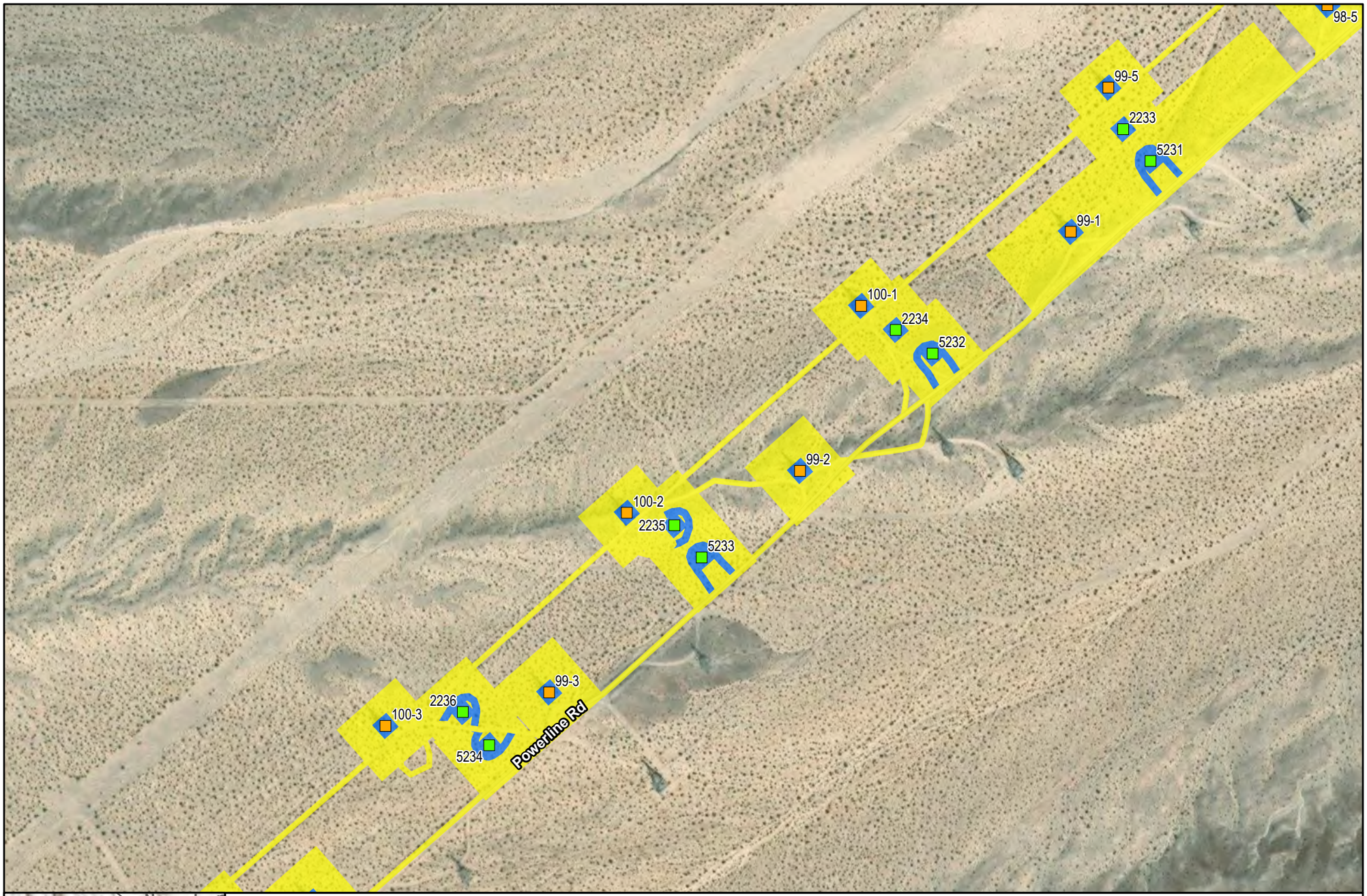

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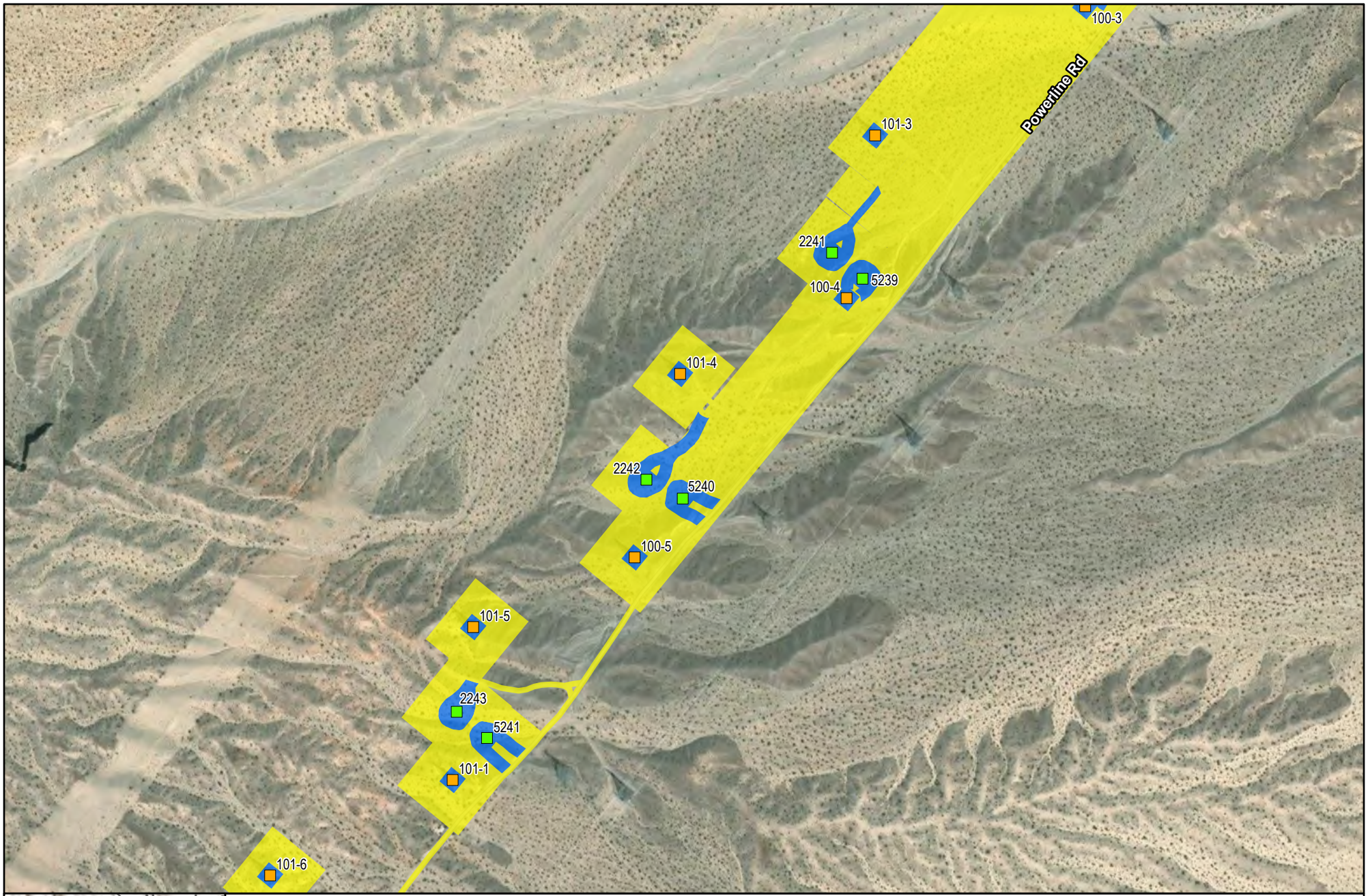

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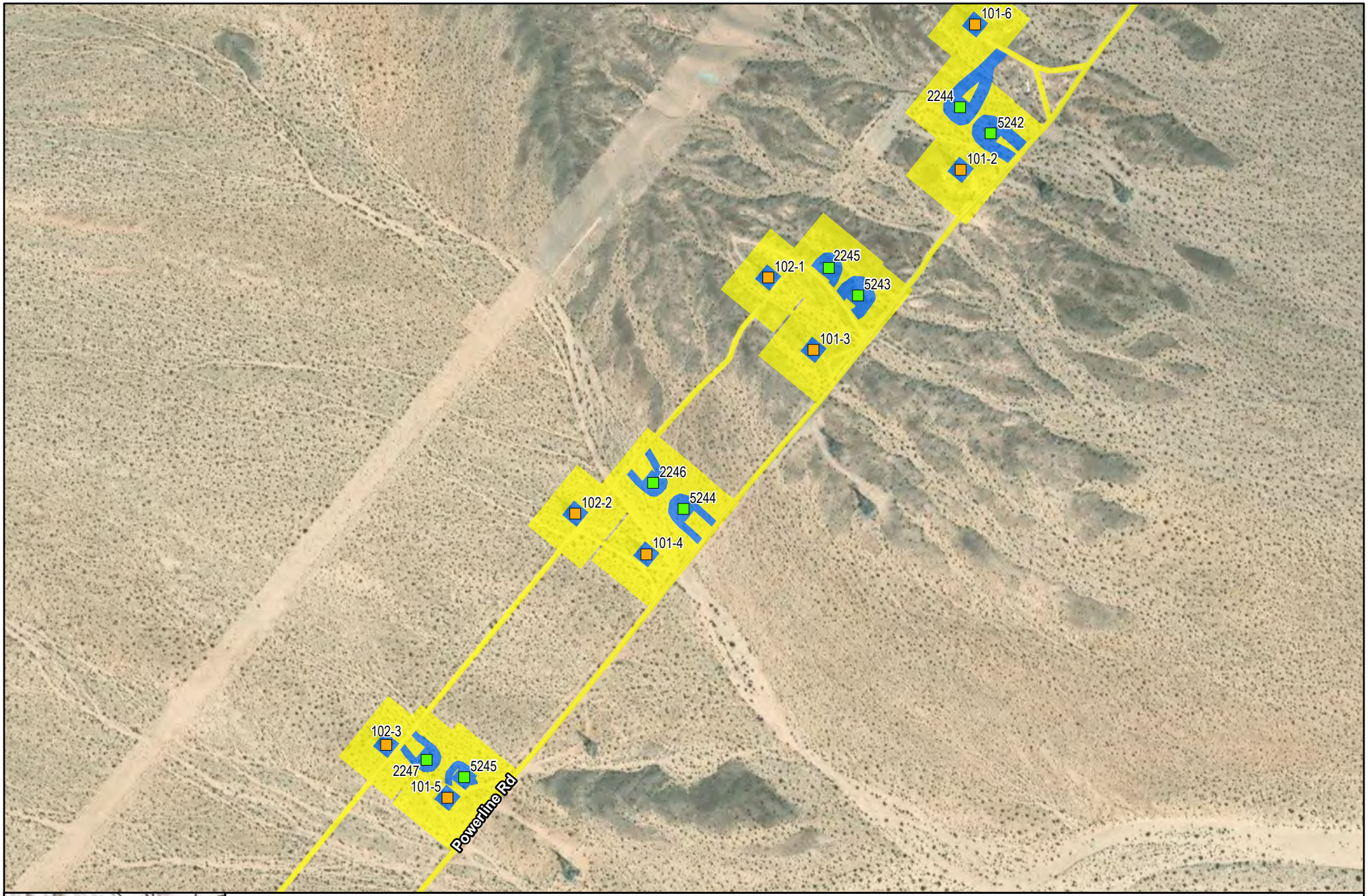

FIGURE 3
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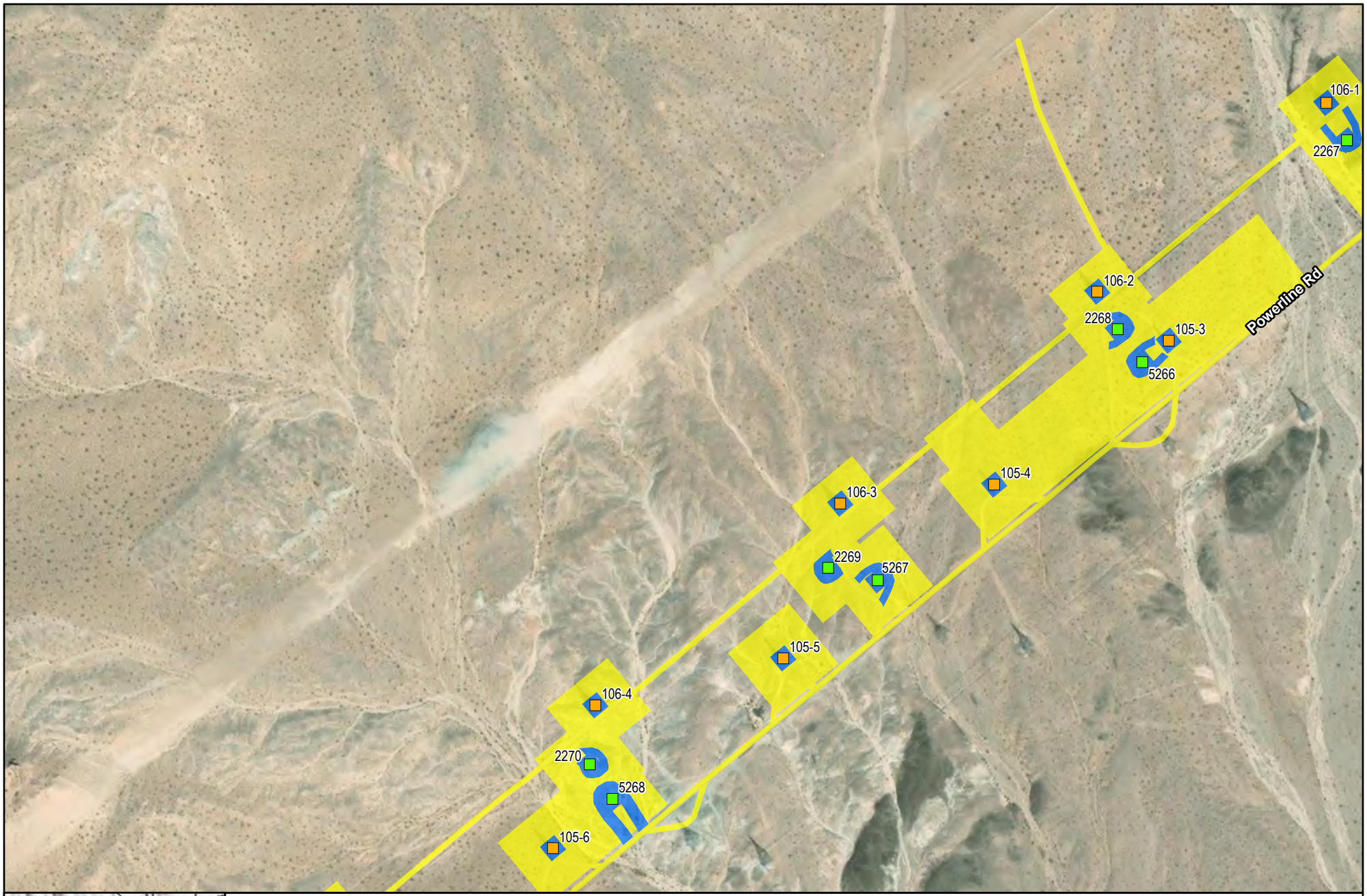

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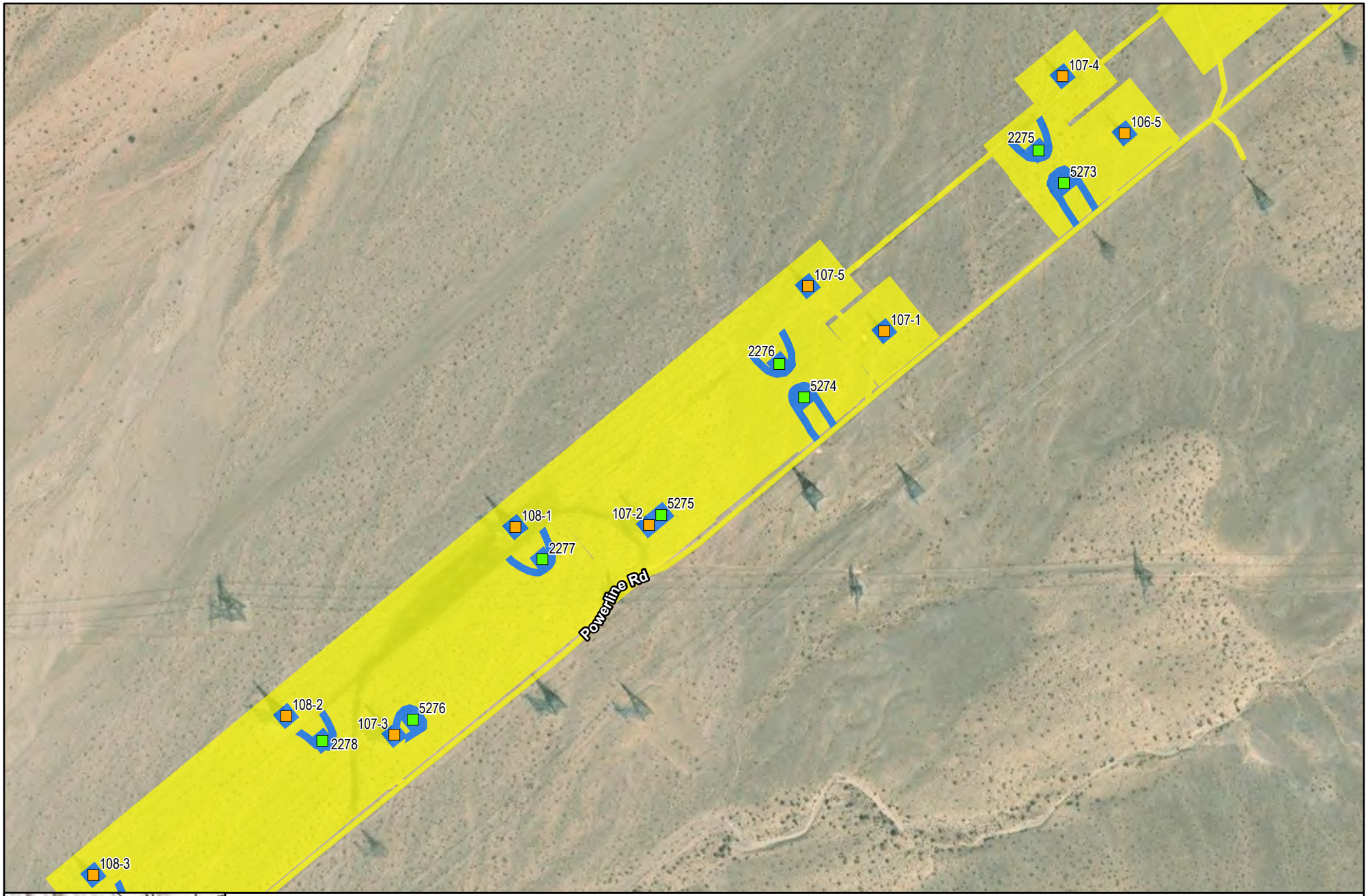

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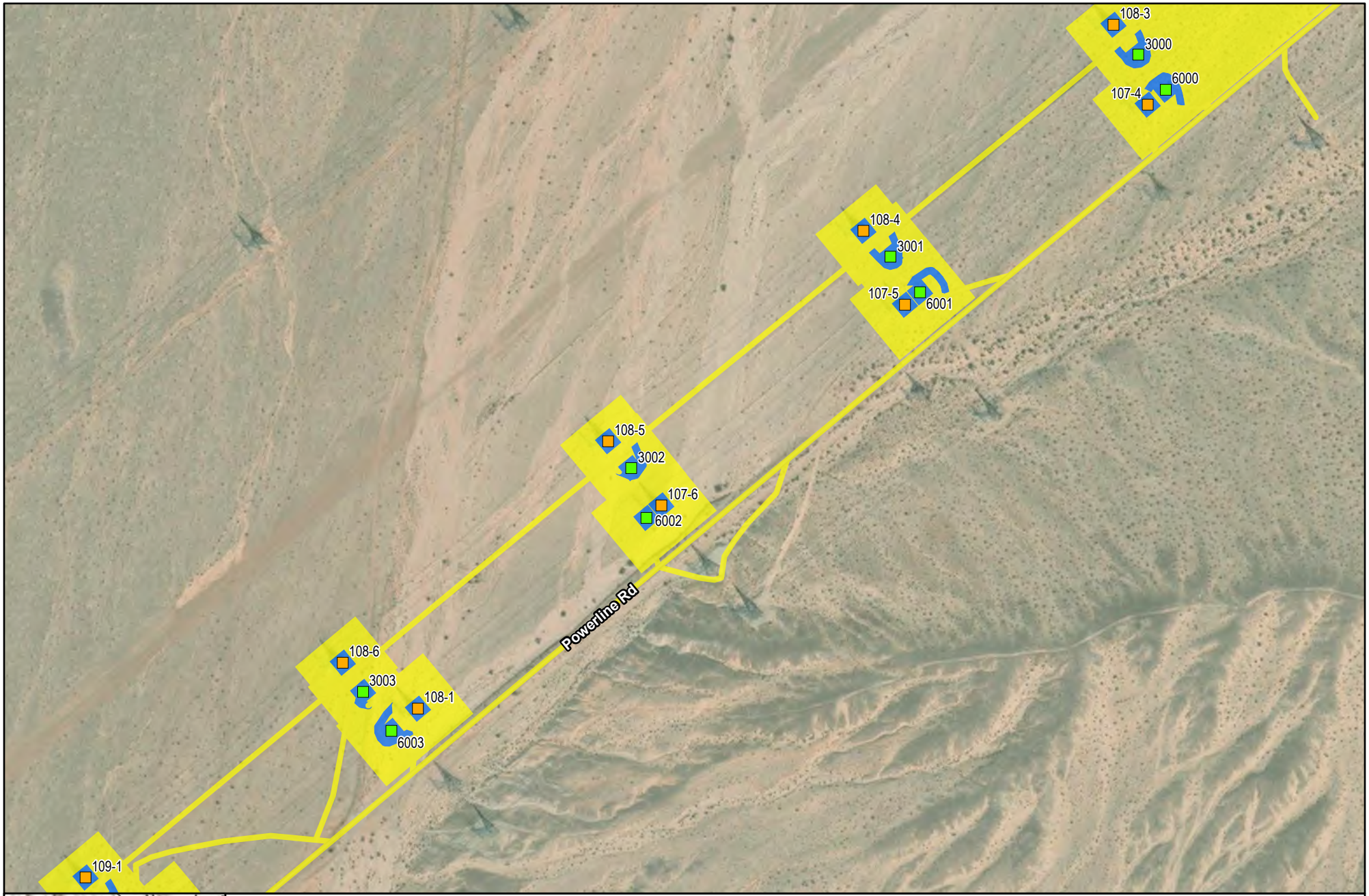

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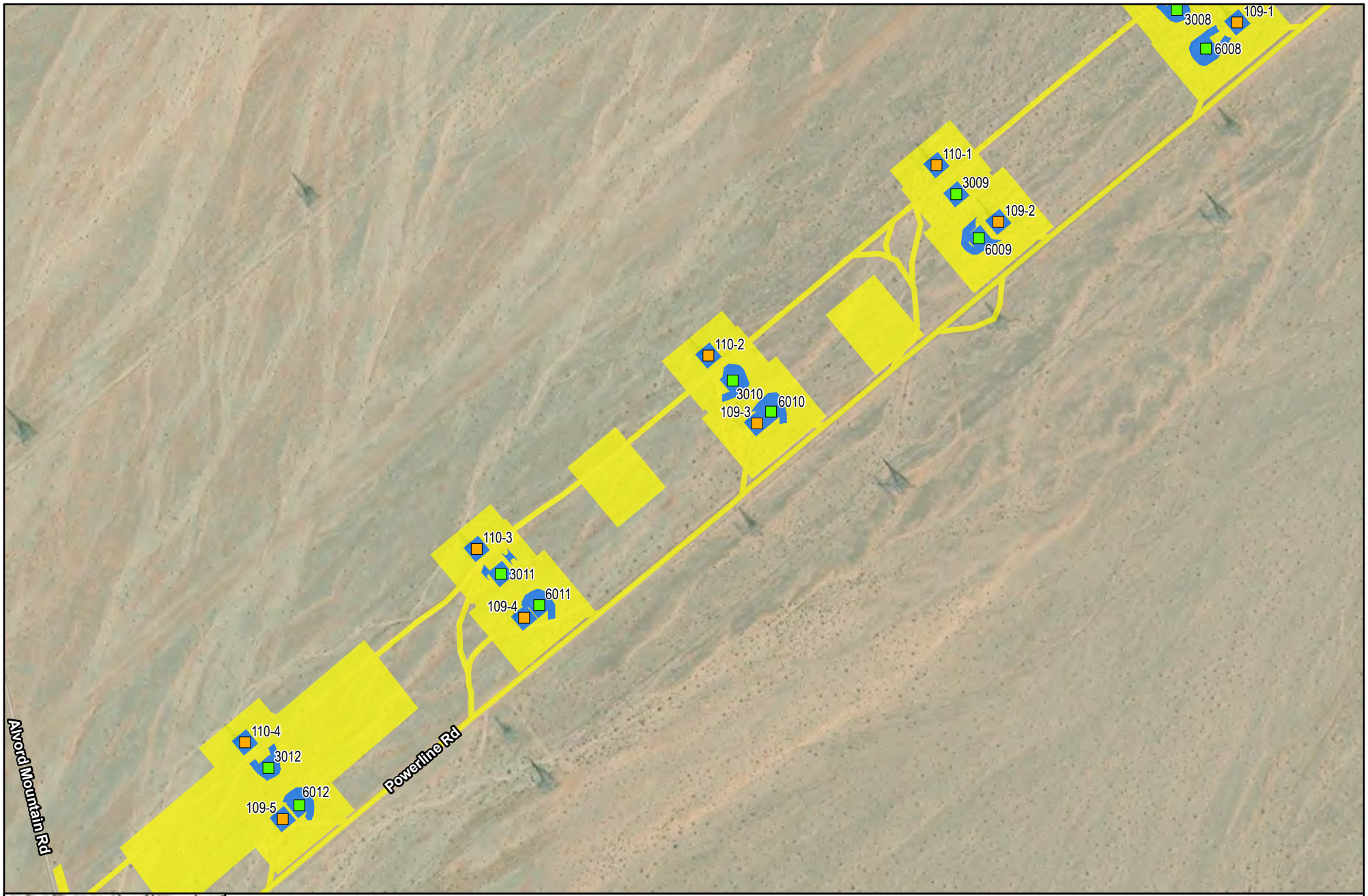

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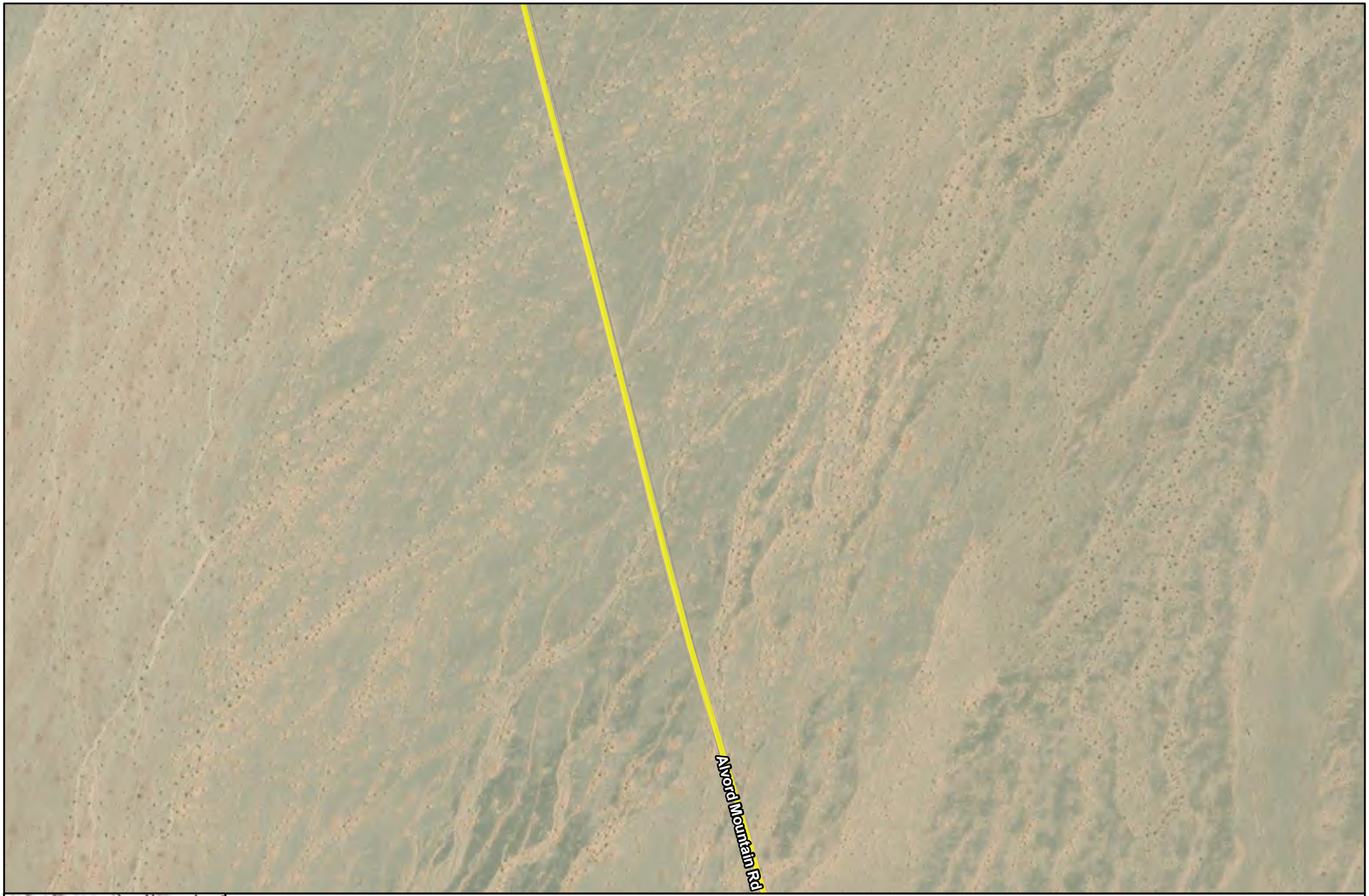

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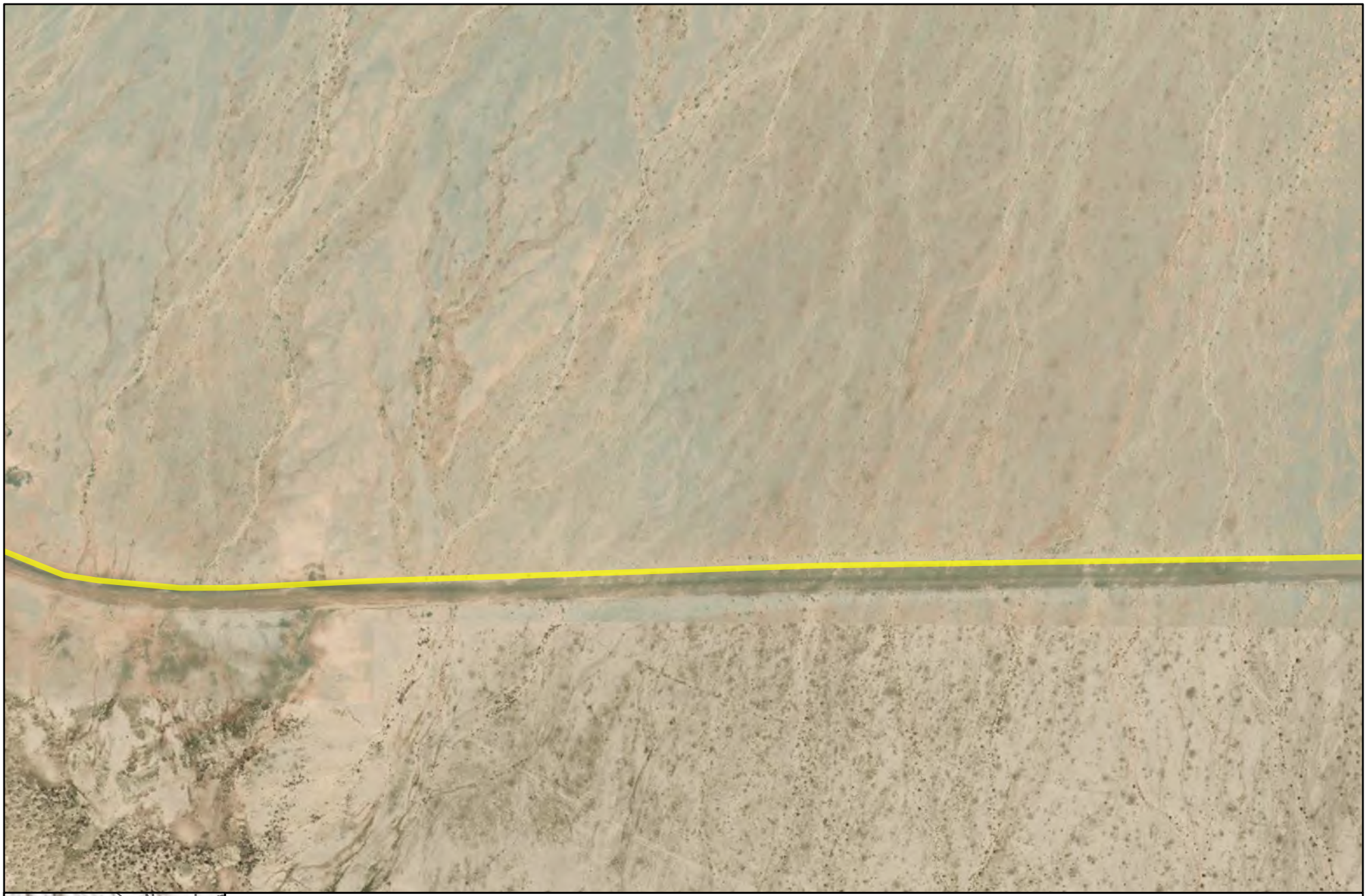

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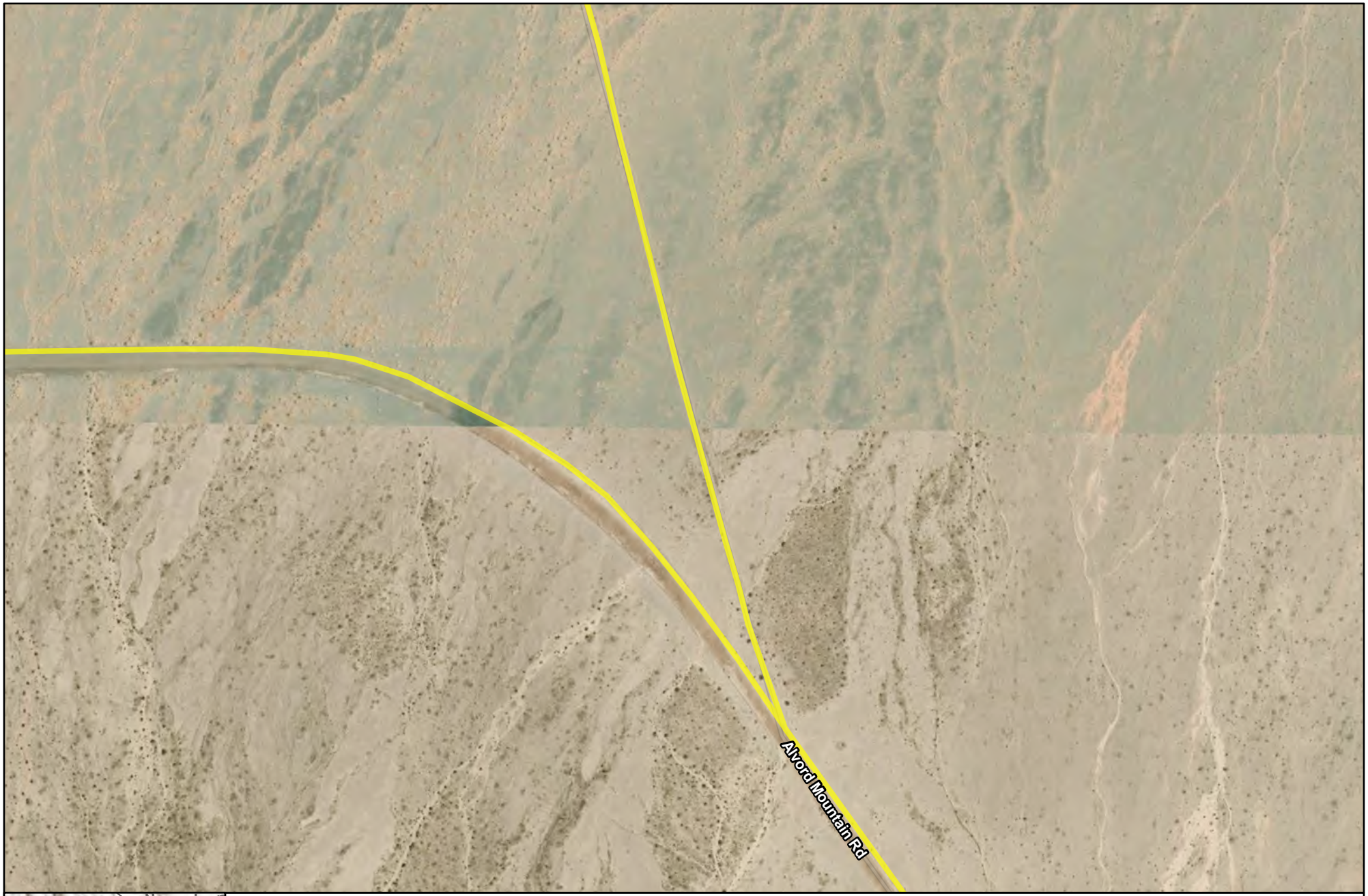

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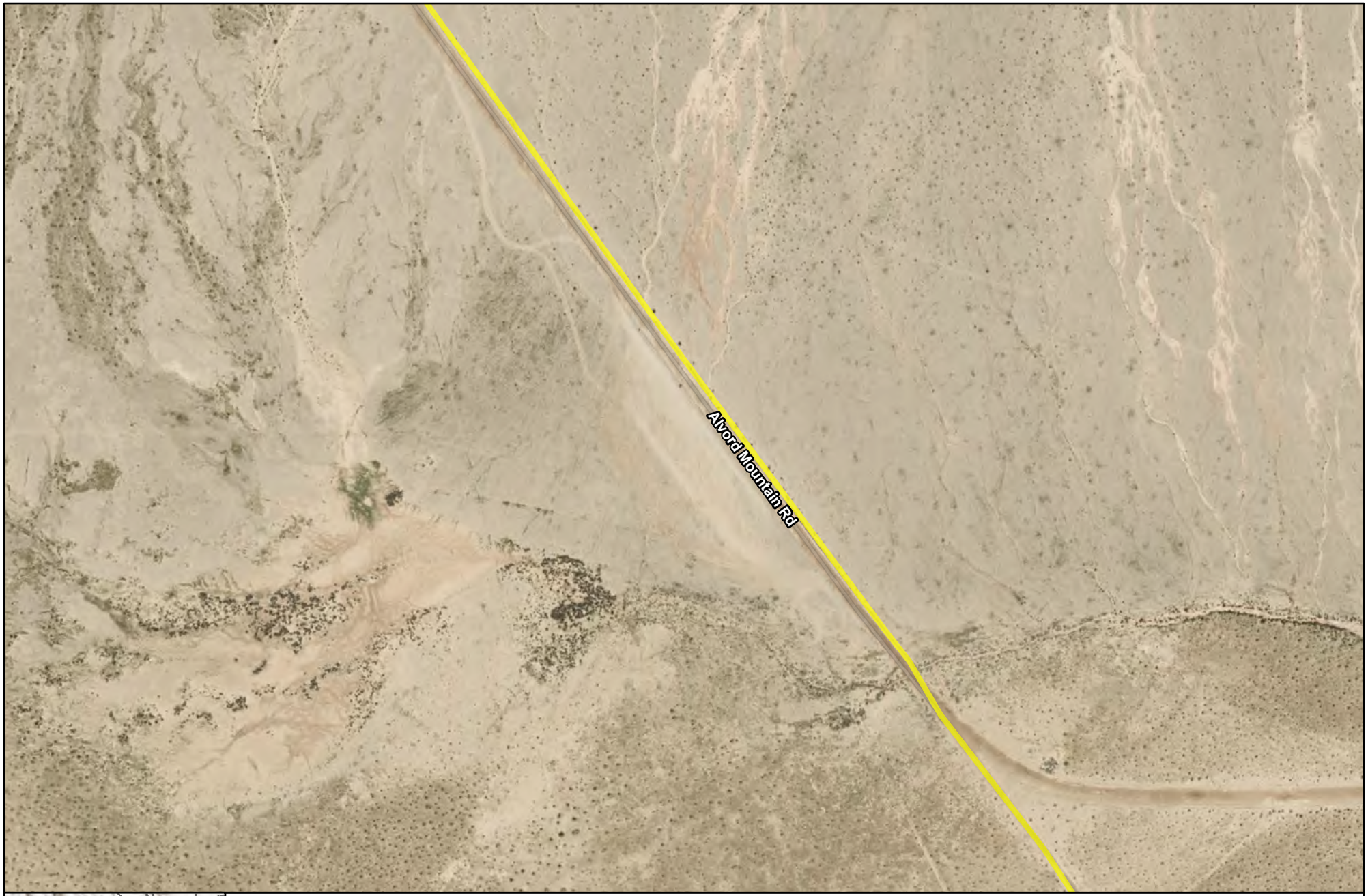

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LA DWP

N

Temporary Impact

0 500 Feet

FIGURE 3
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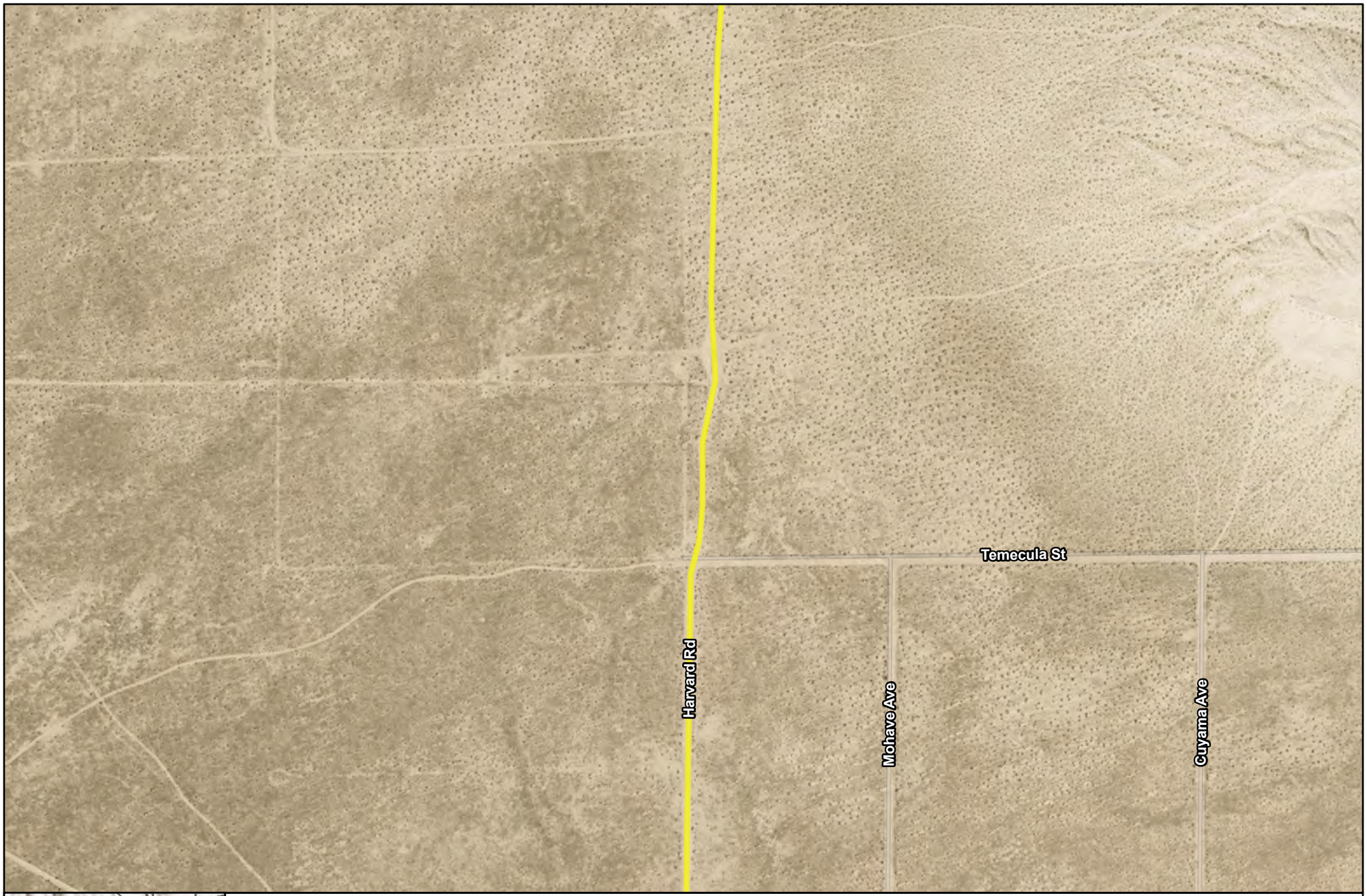

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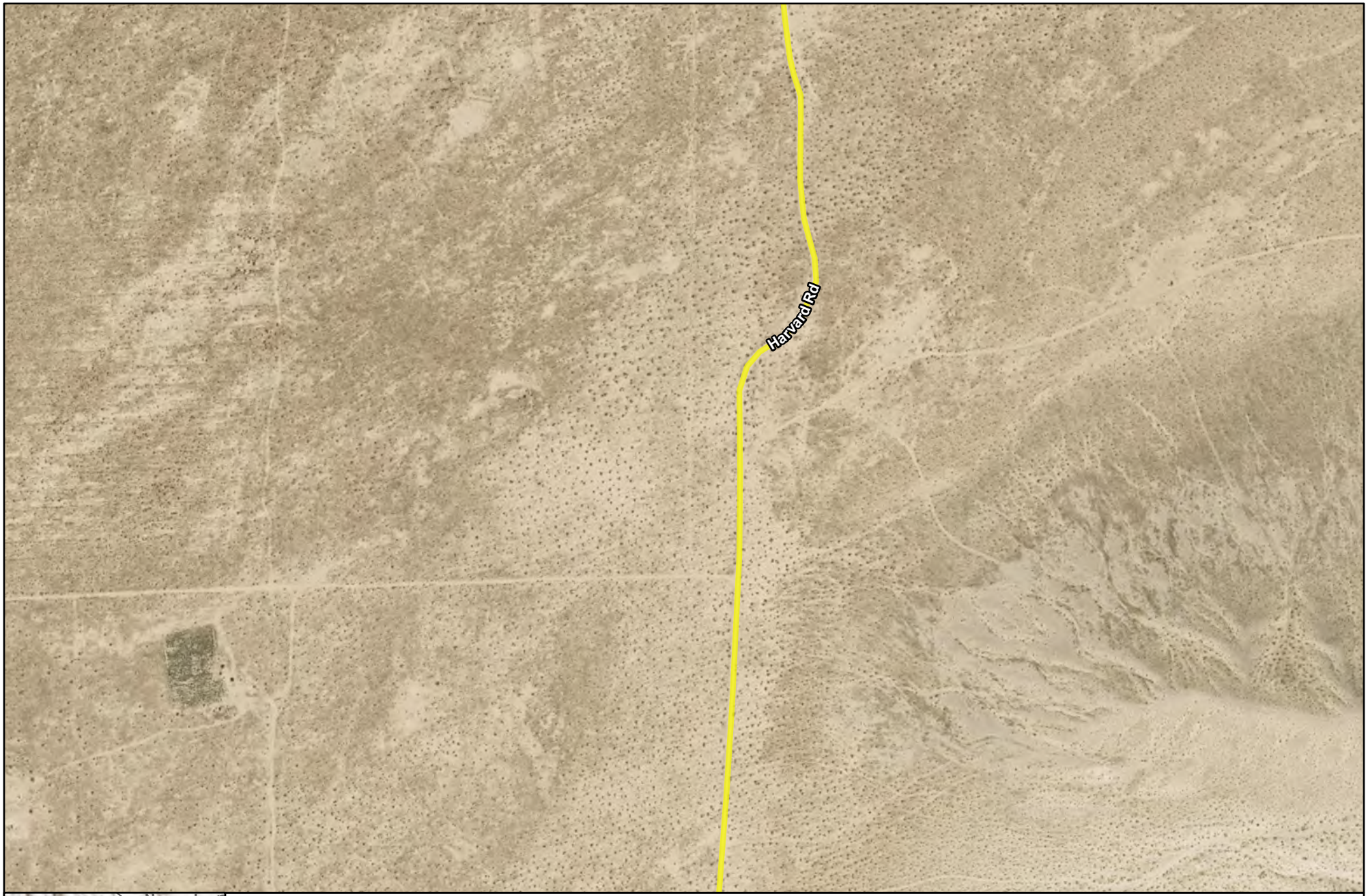

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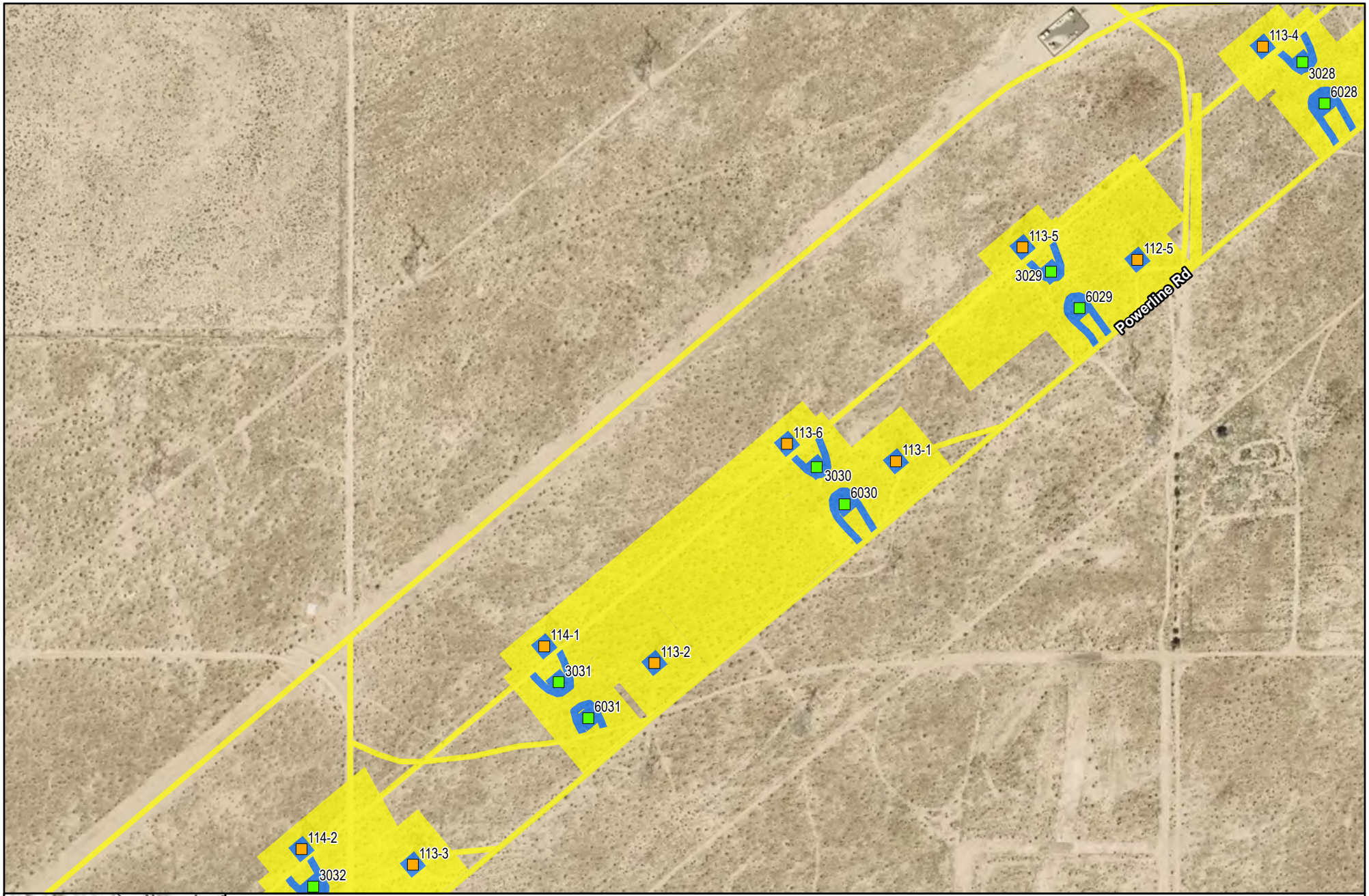

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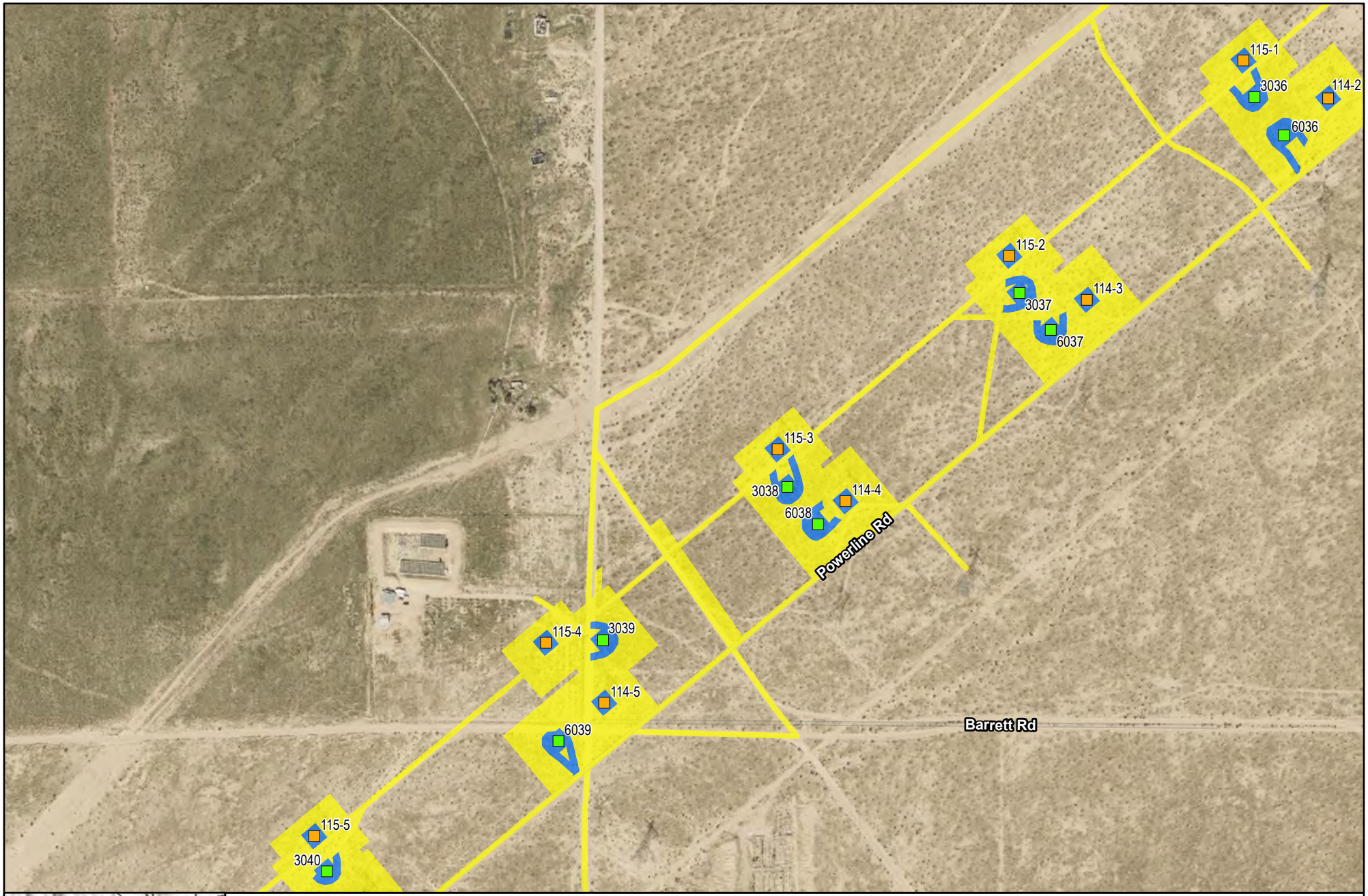

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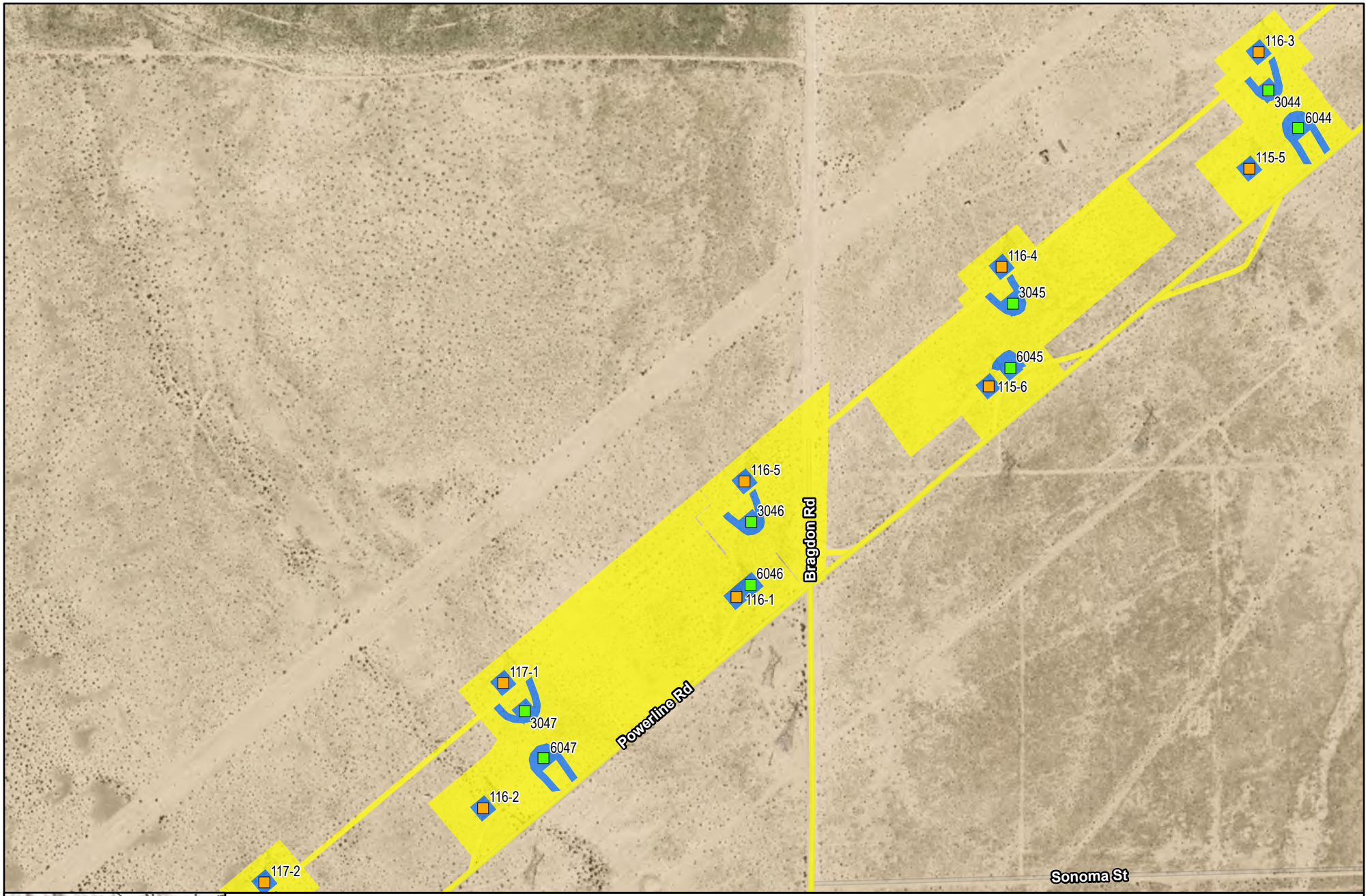

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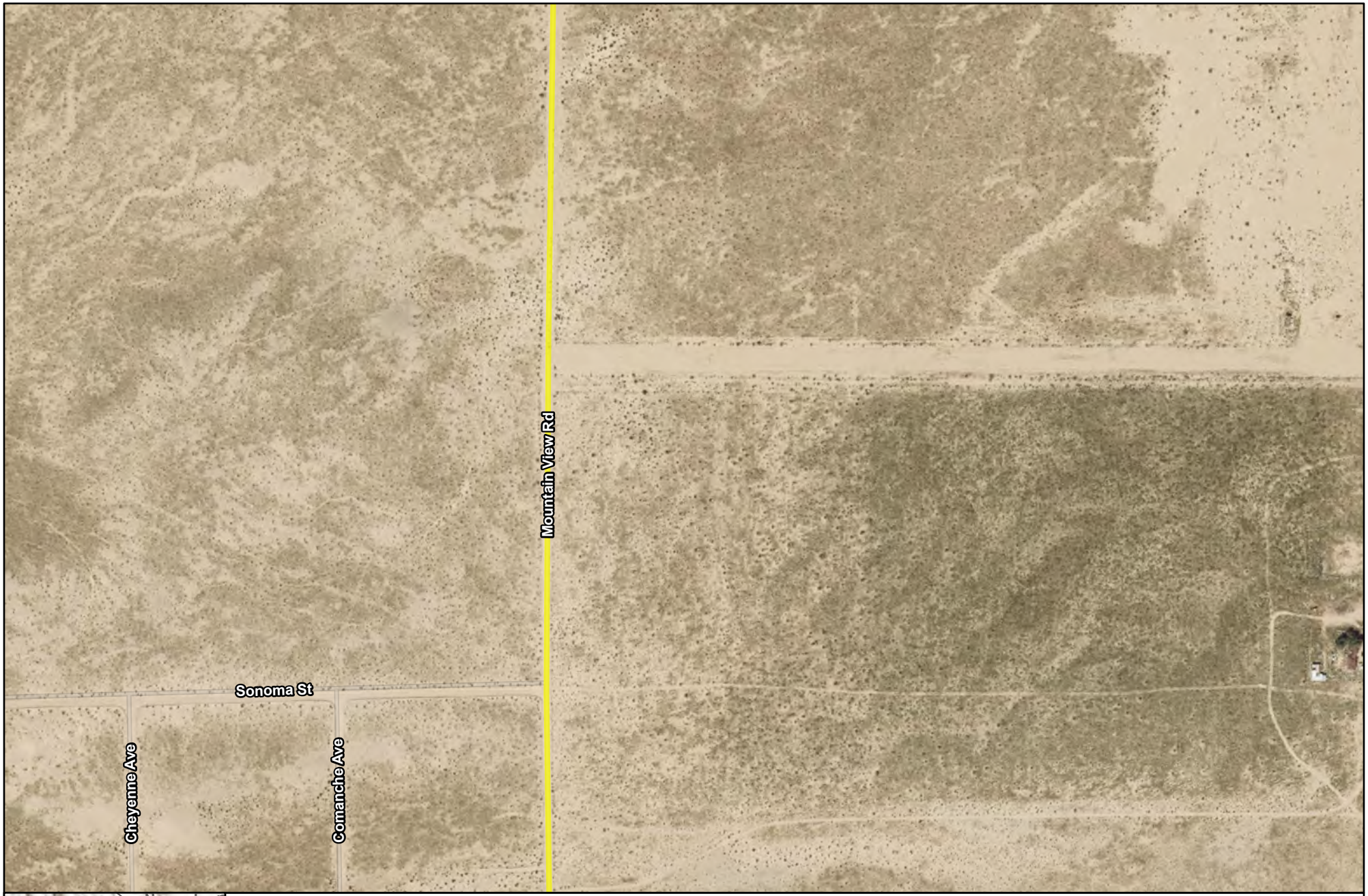

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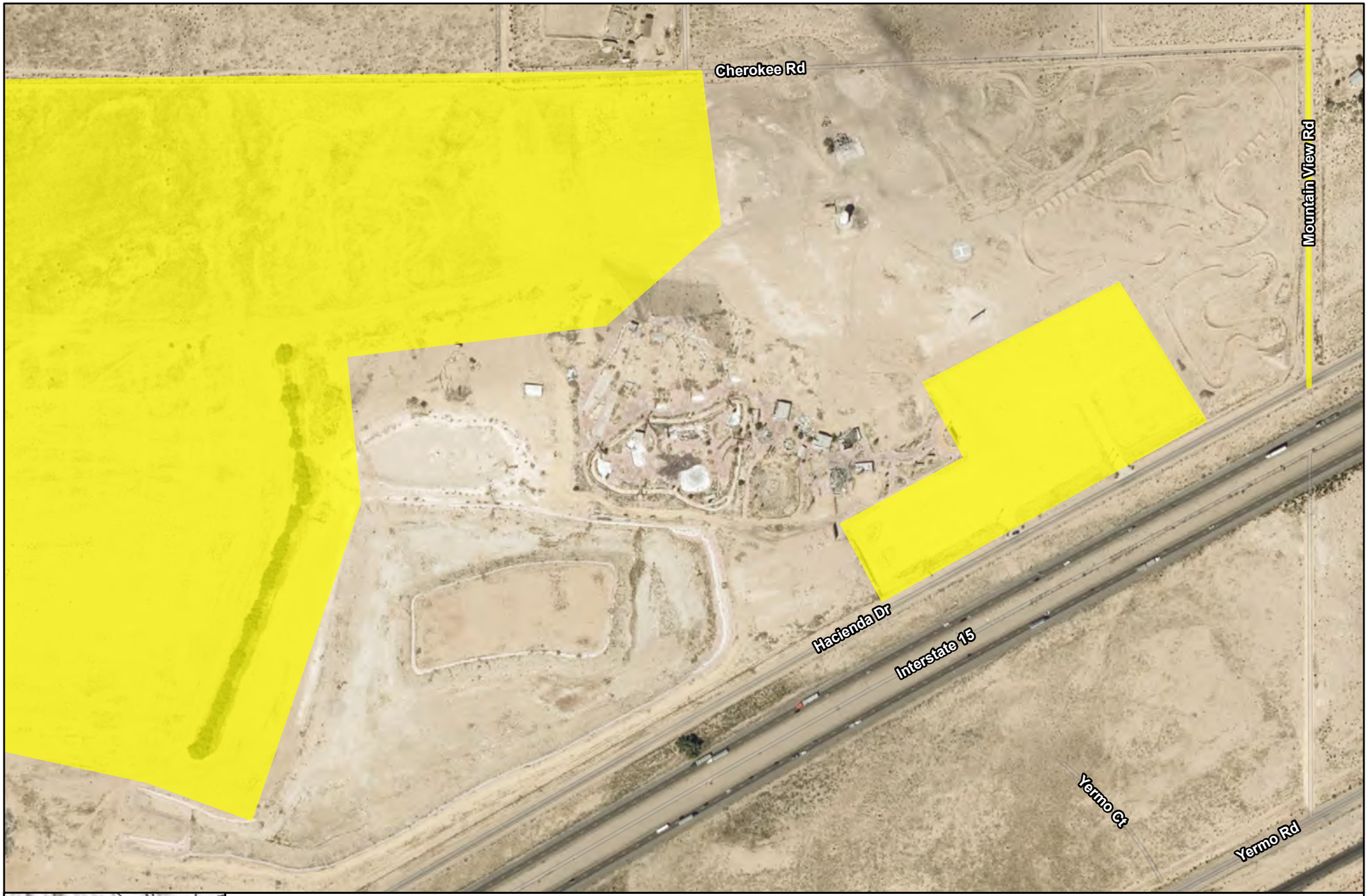

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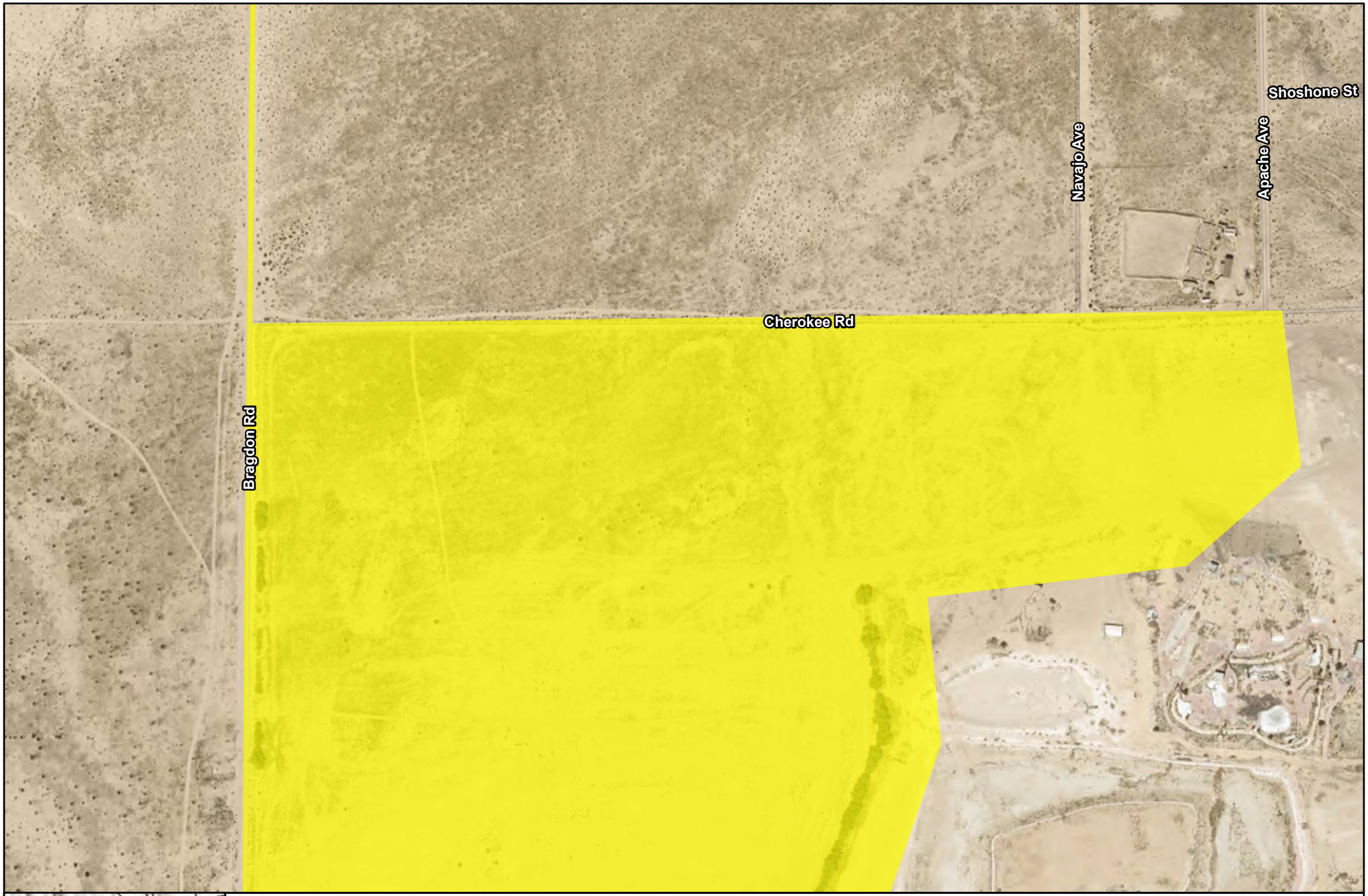

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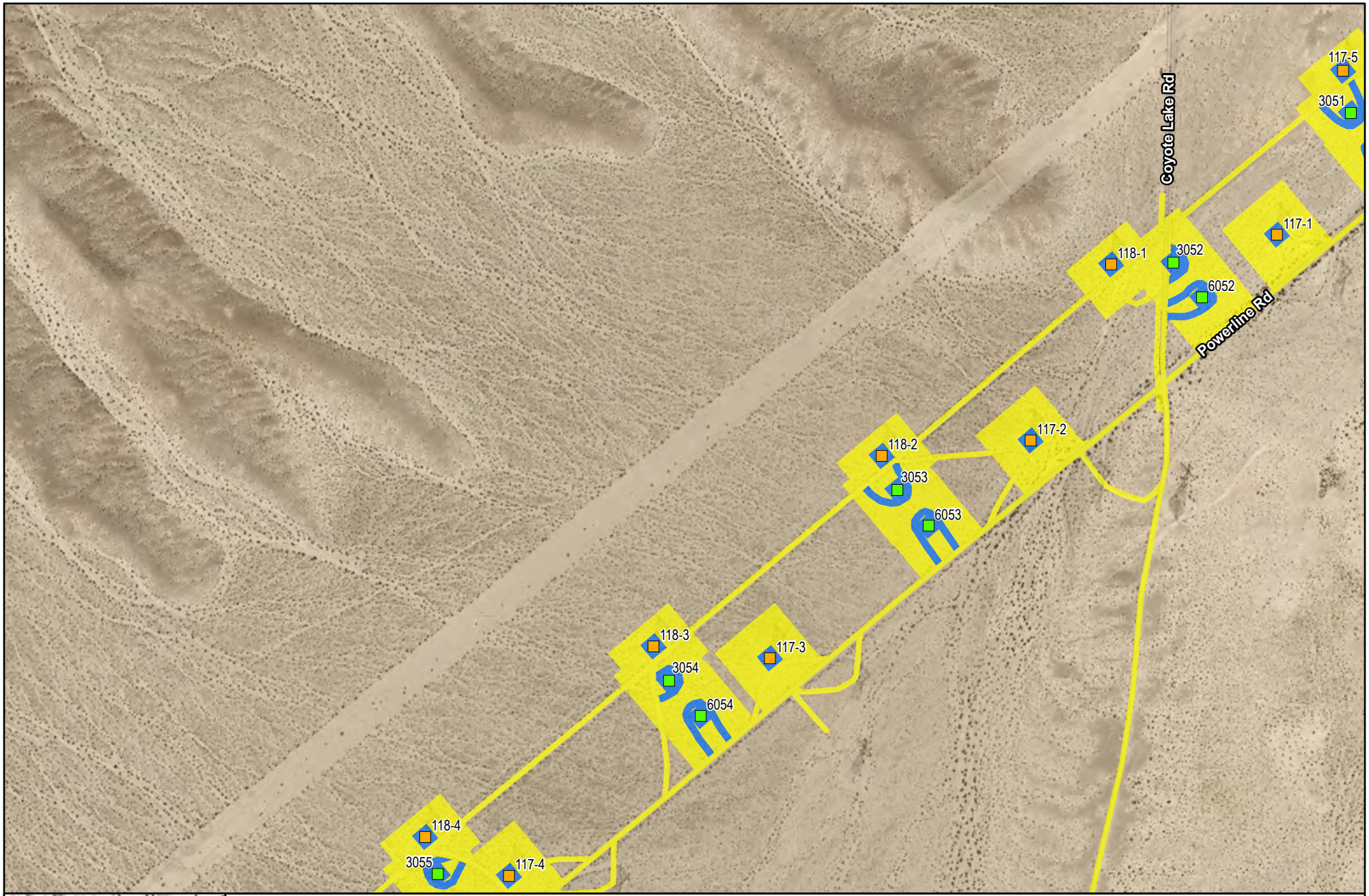

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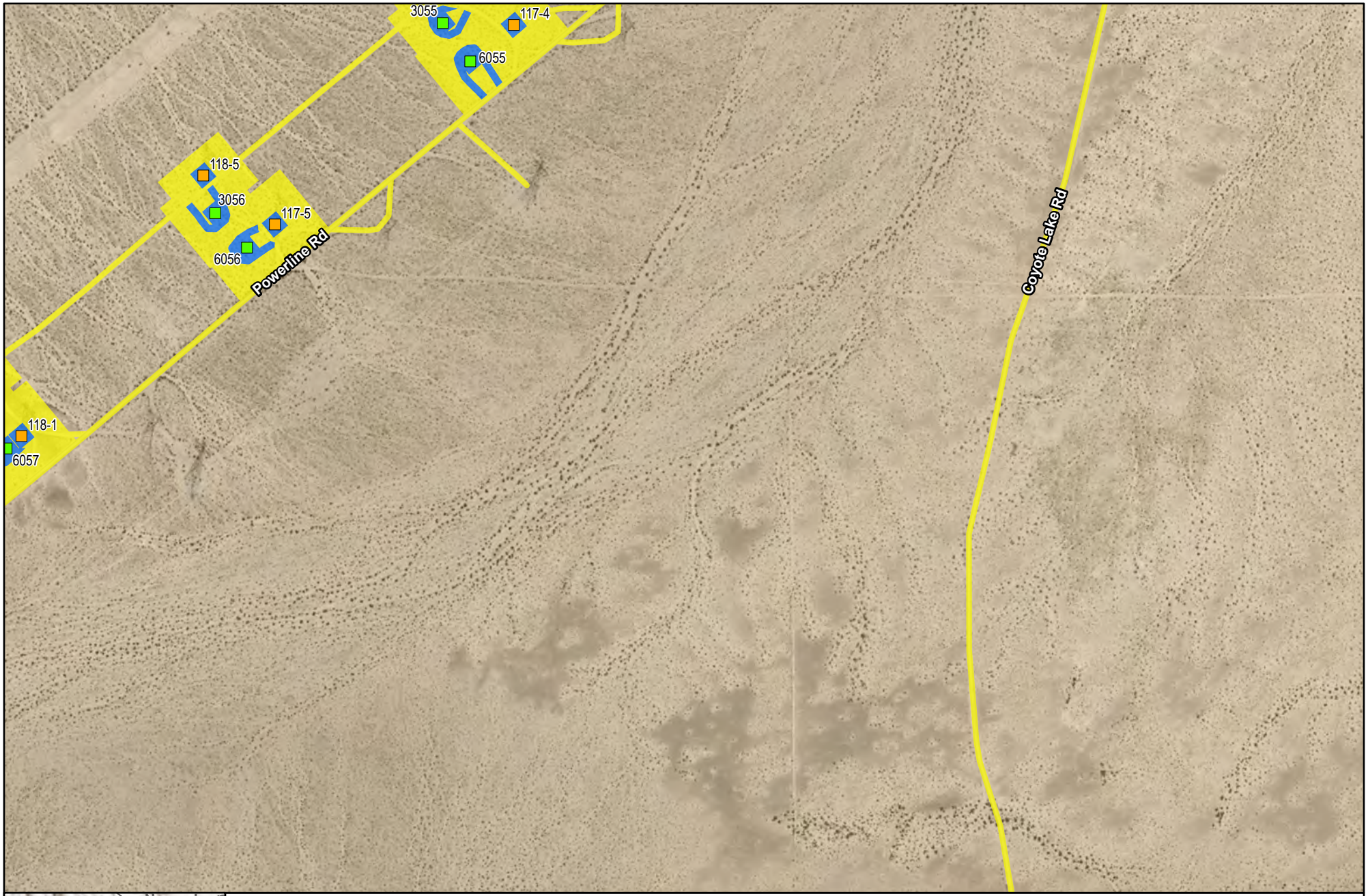

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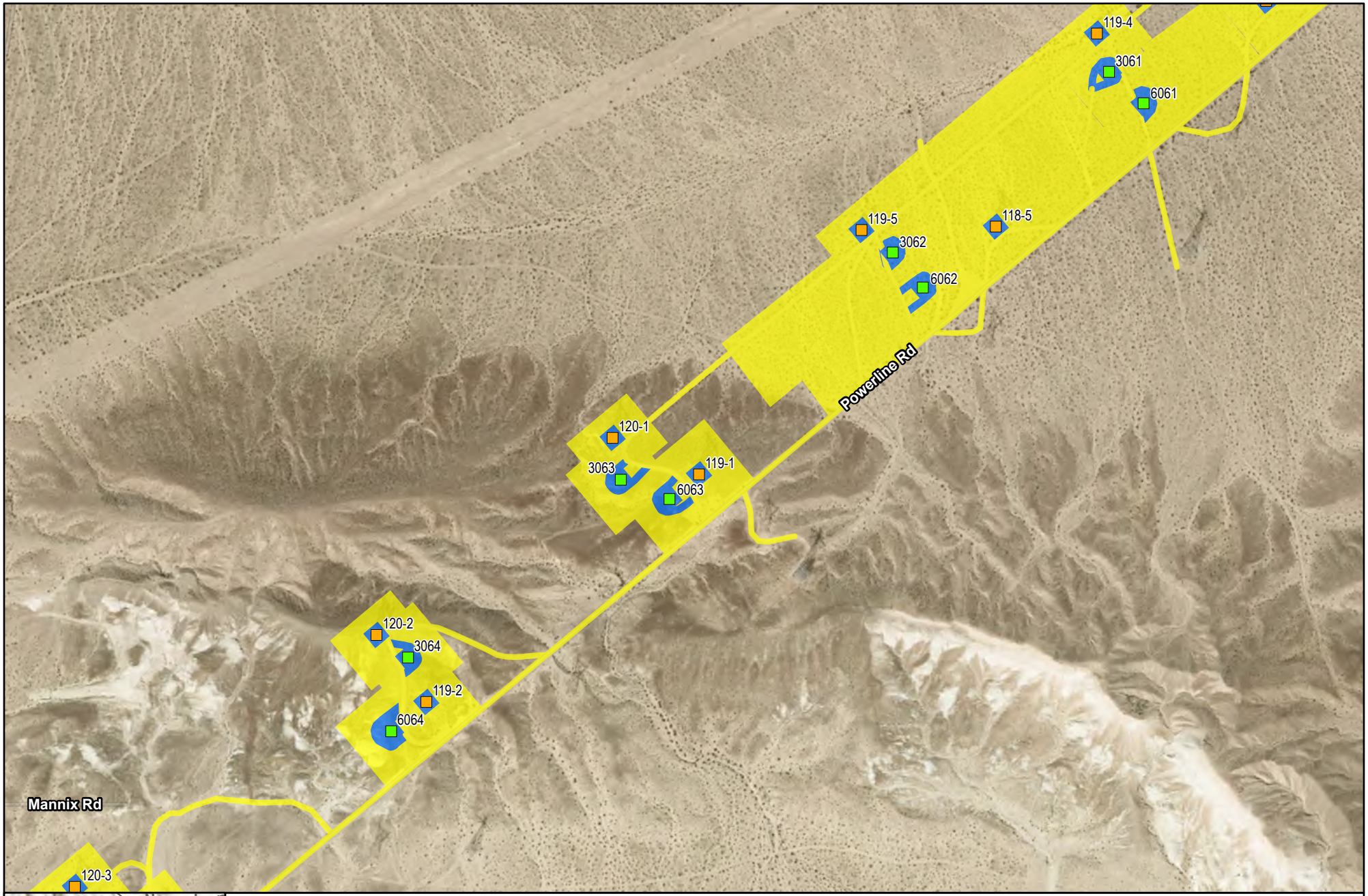

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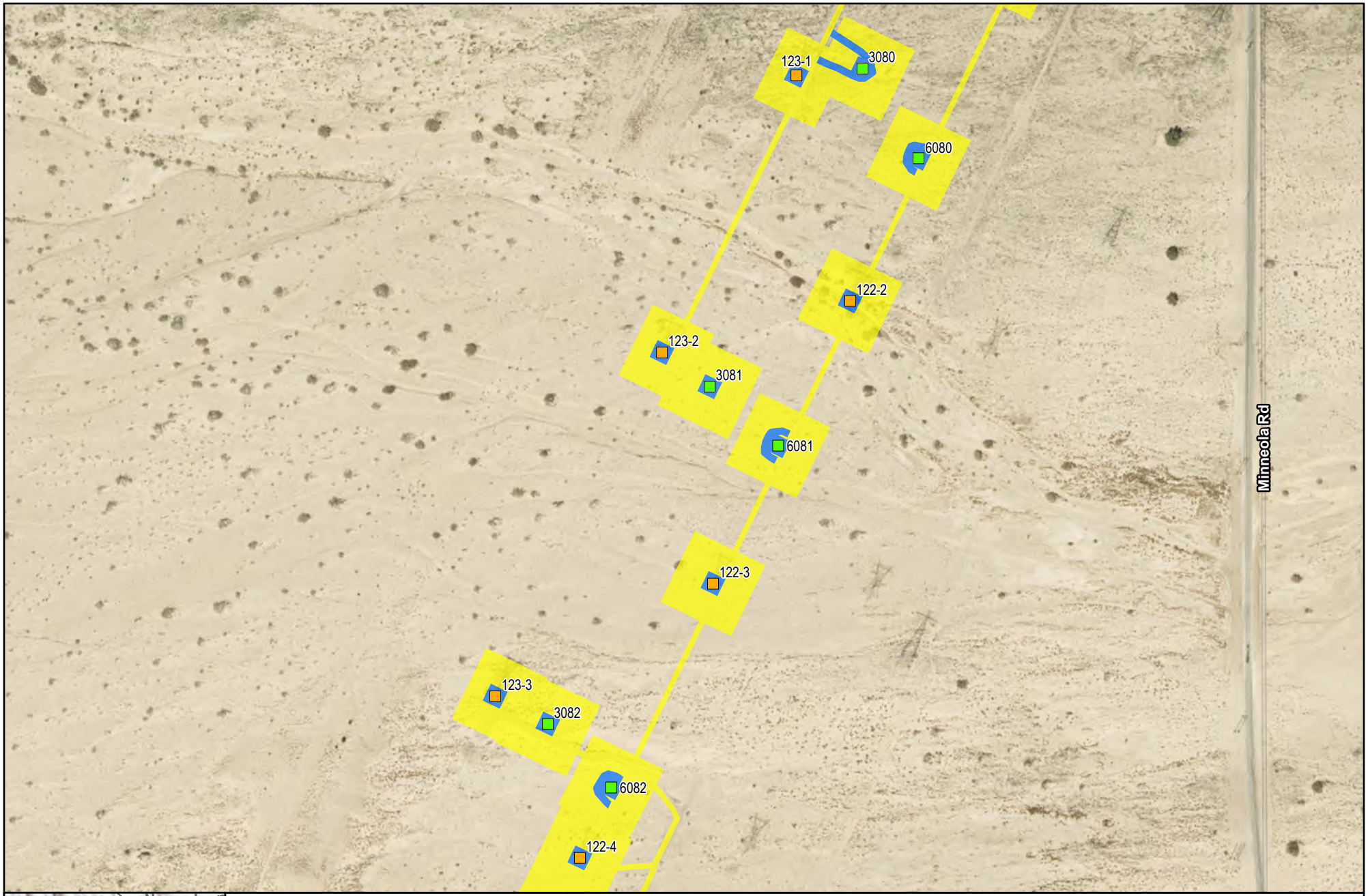

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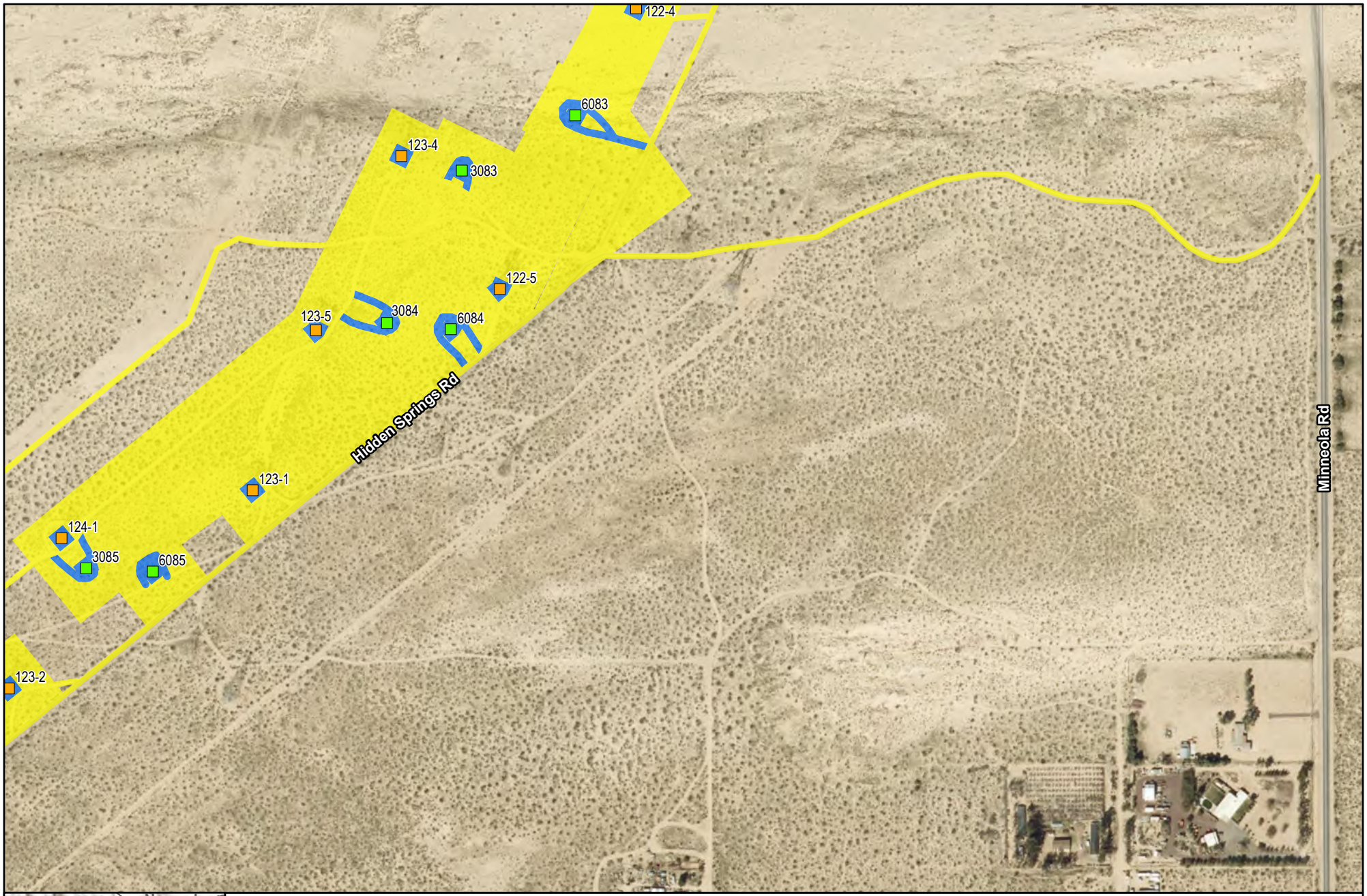

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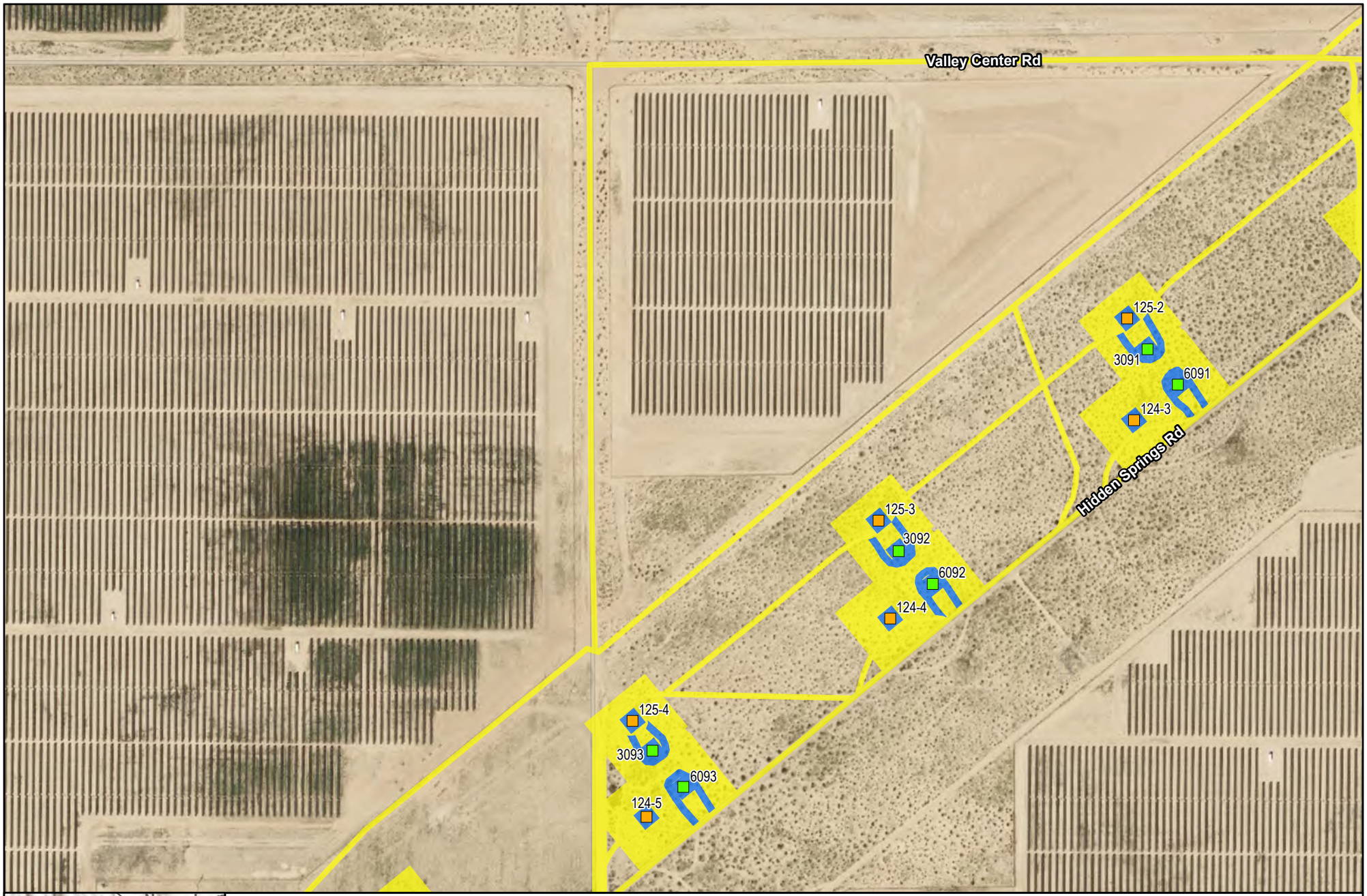

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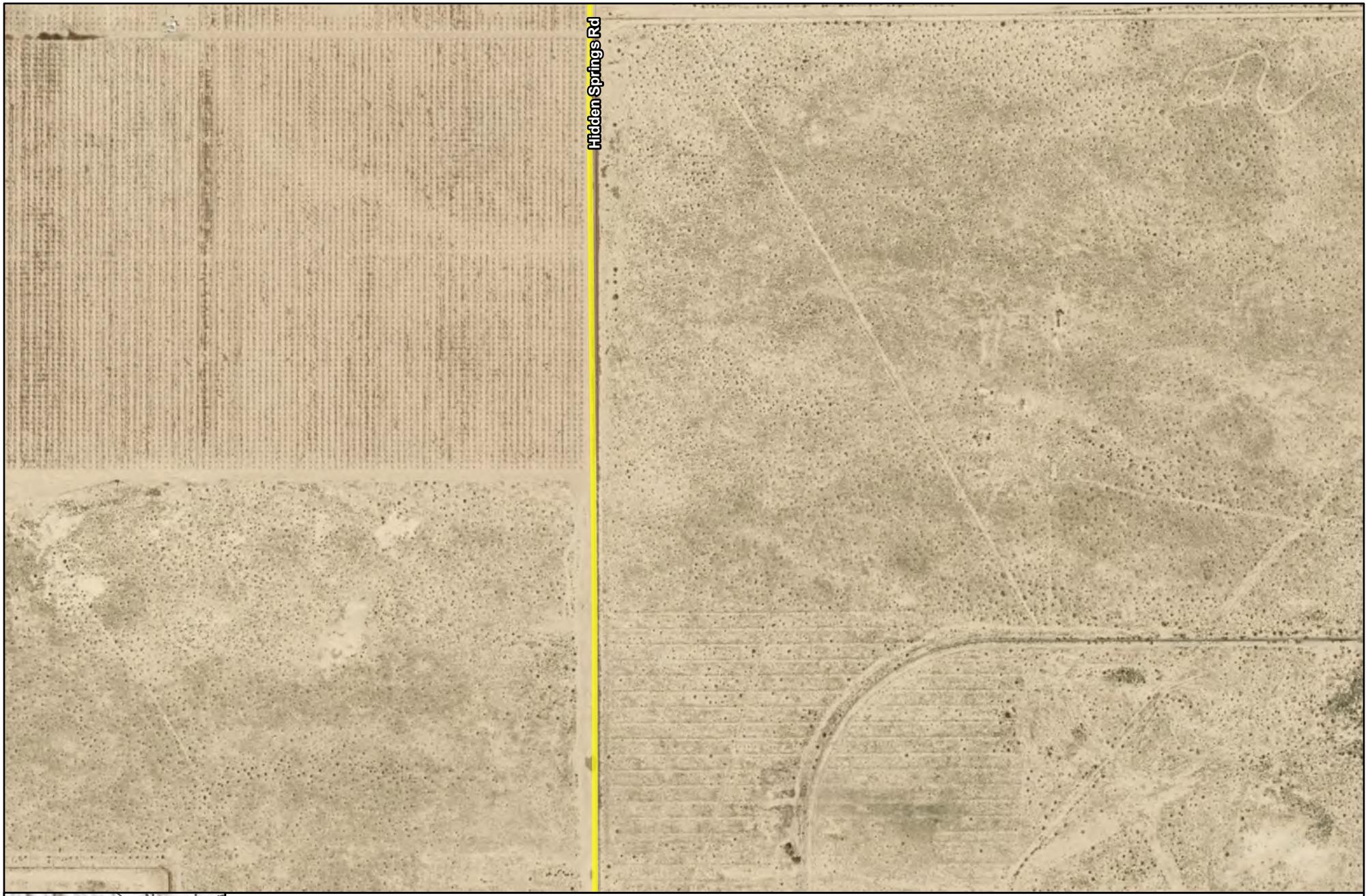

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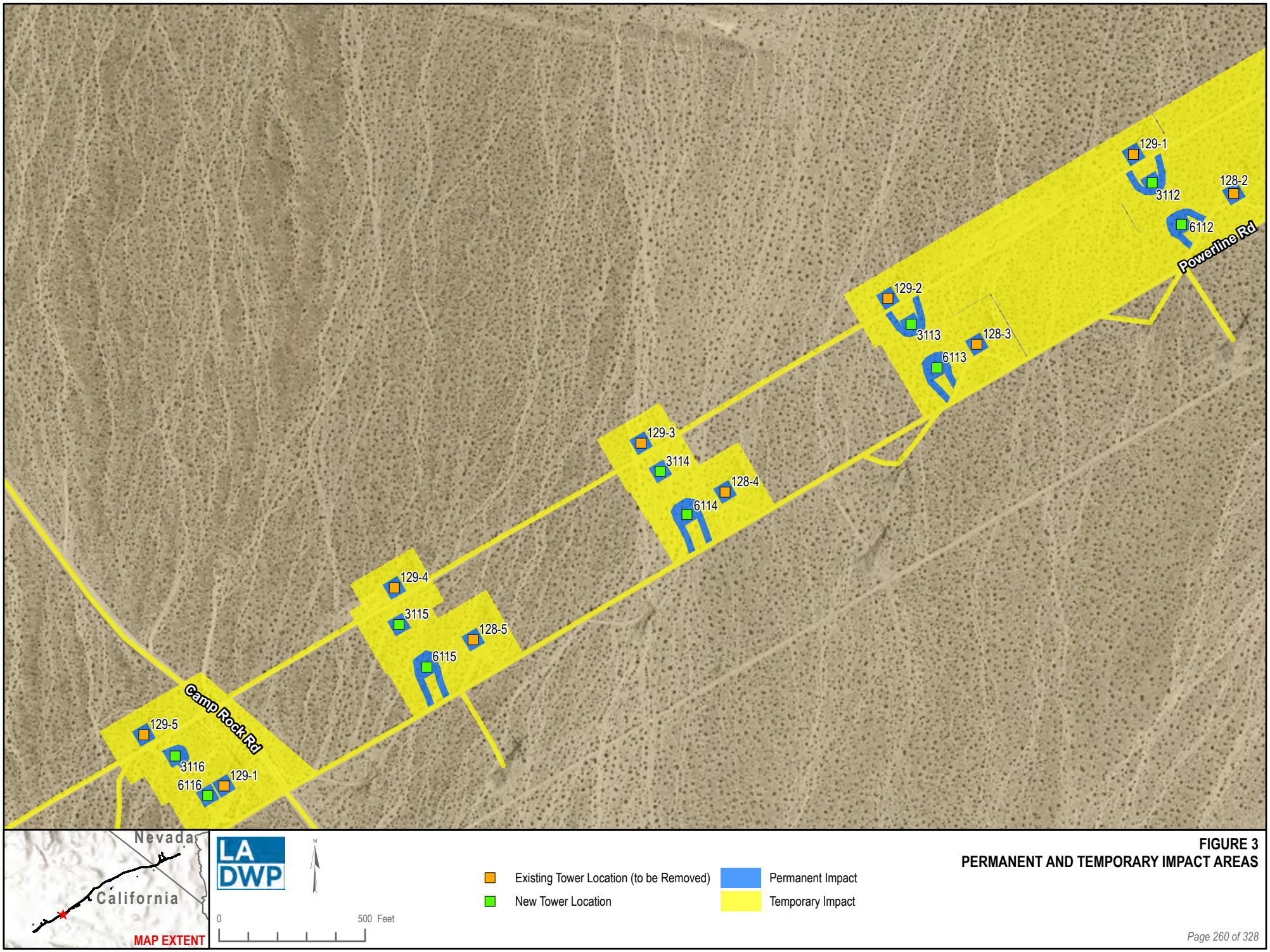

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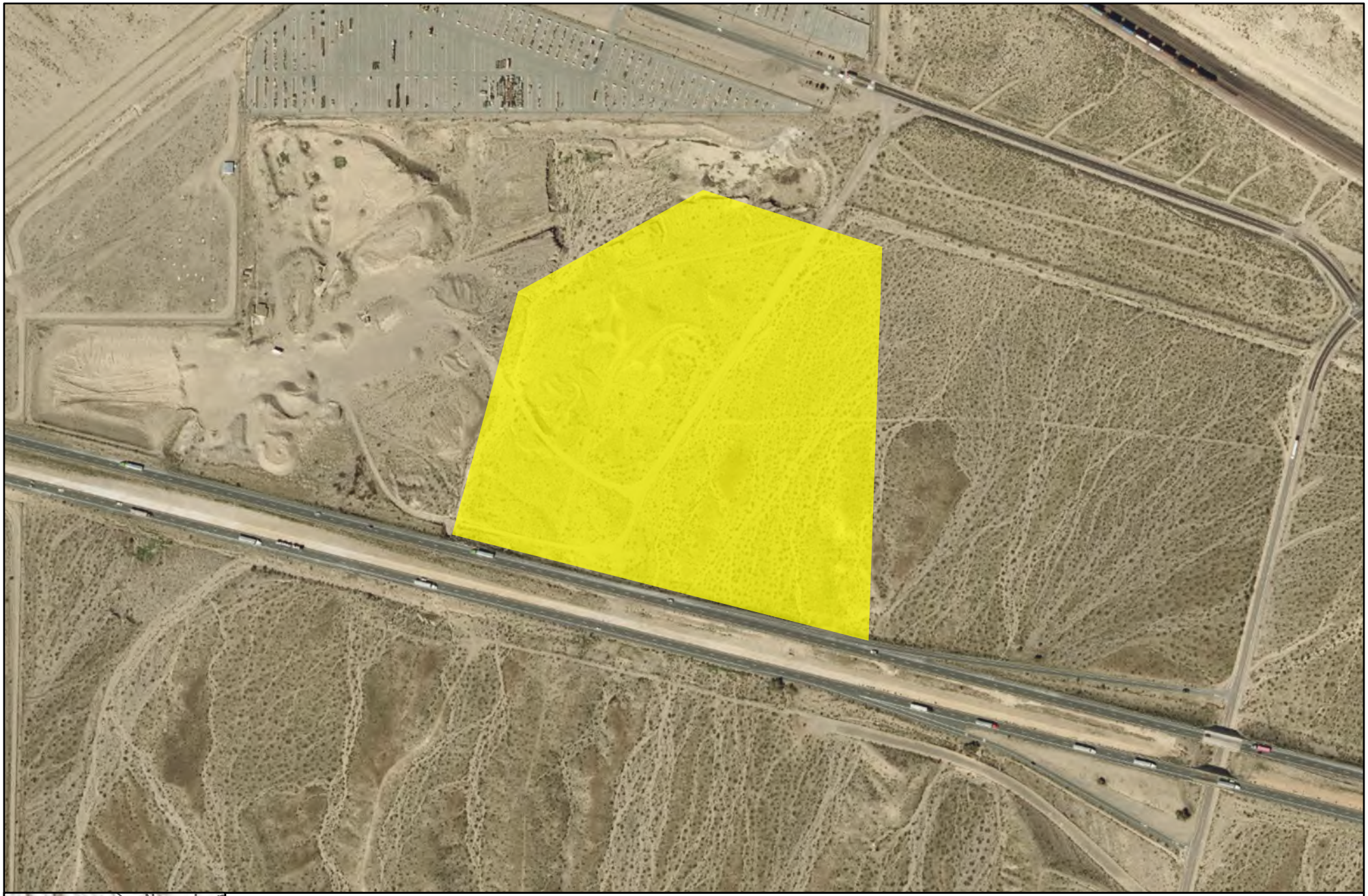

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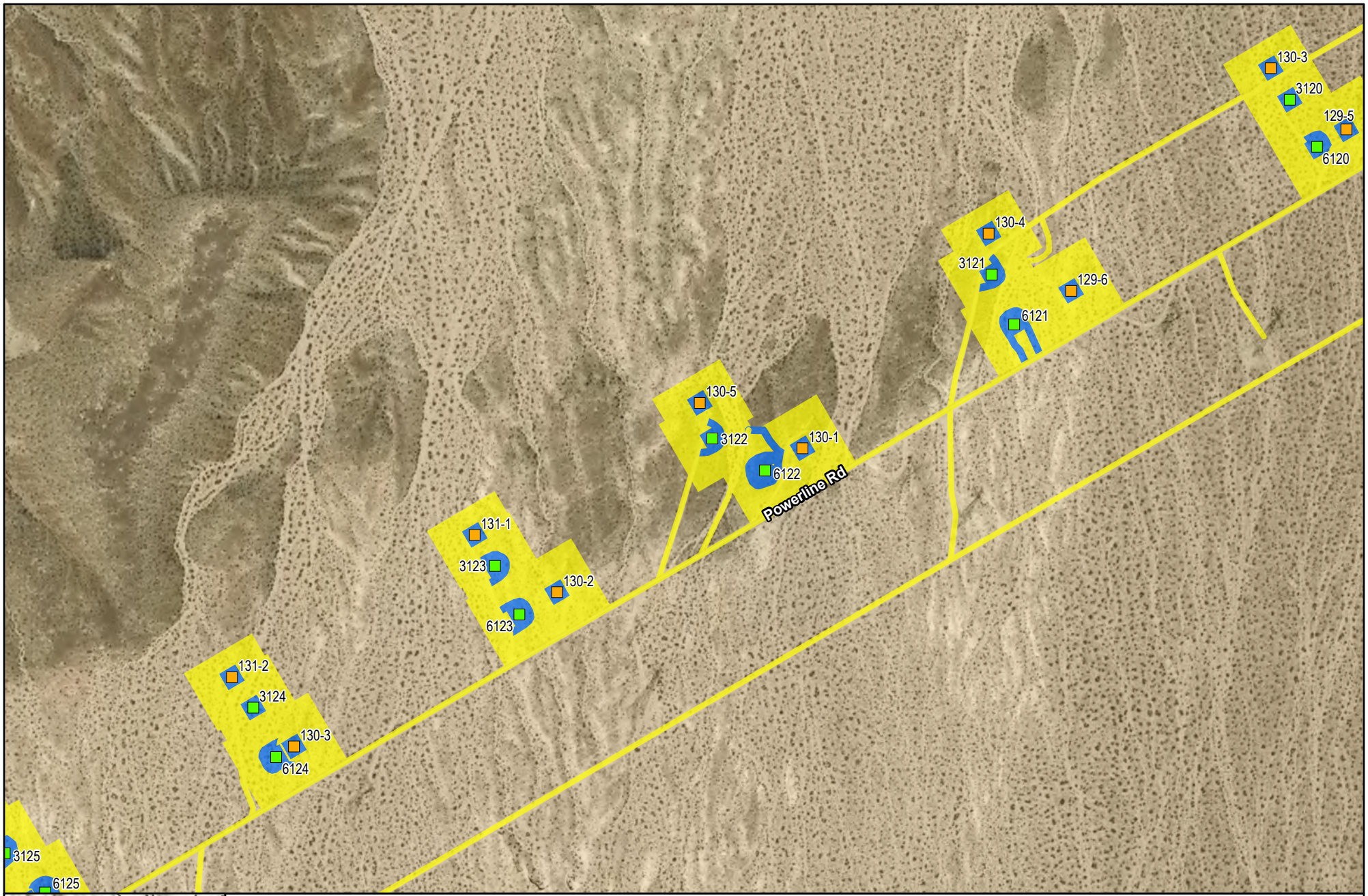

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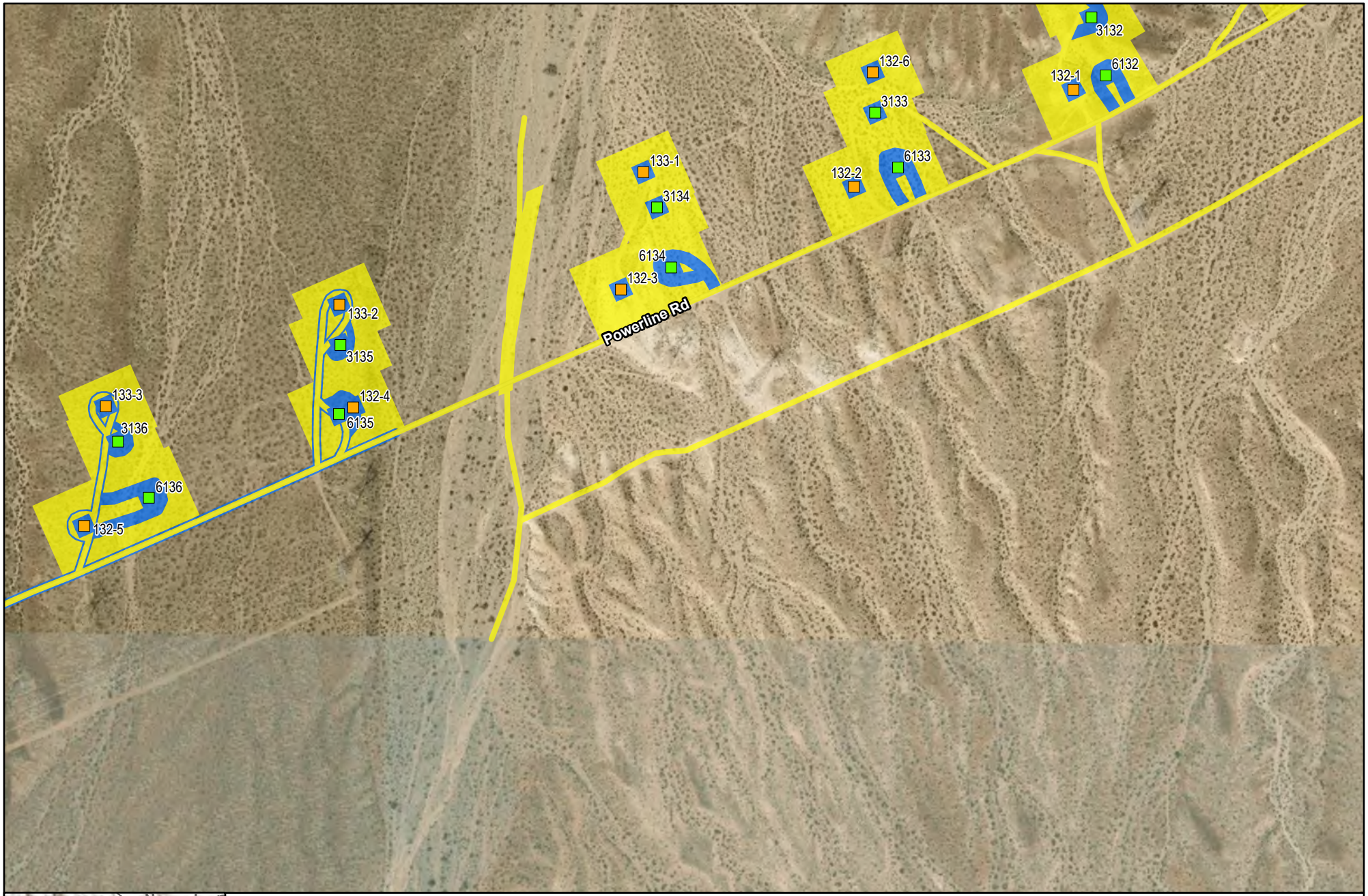

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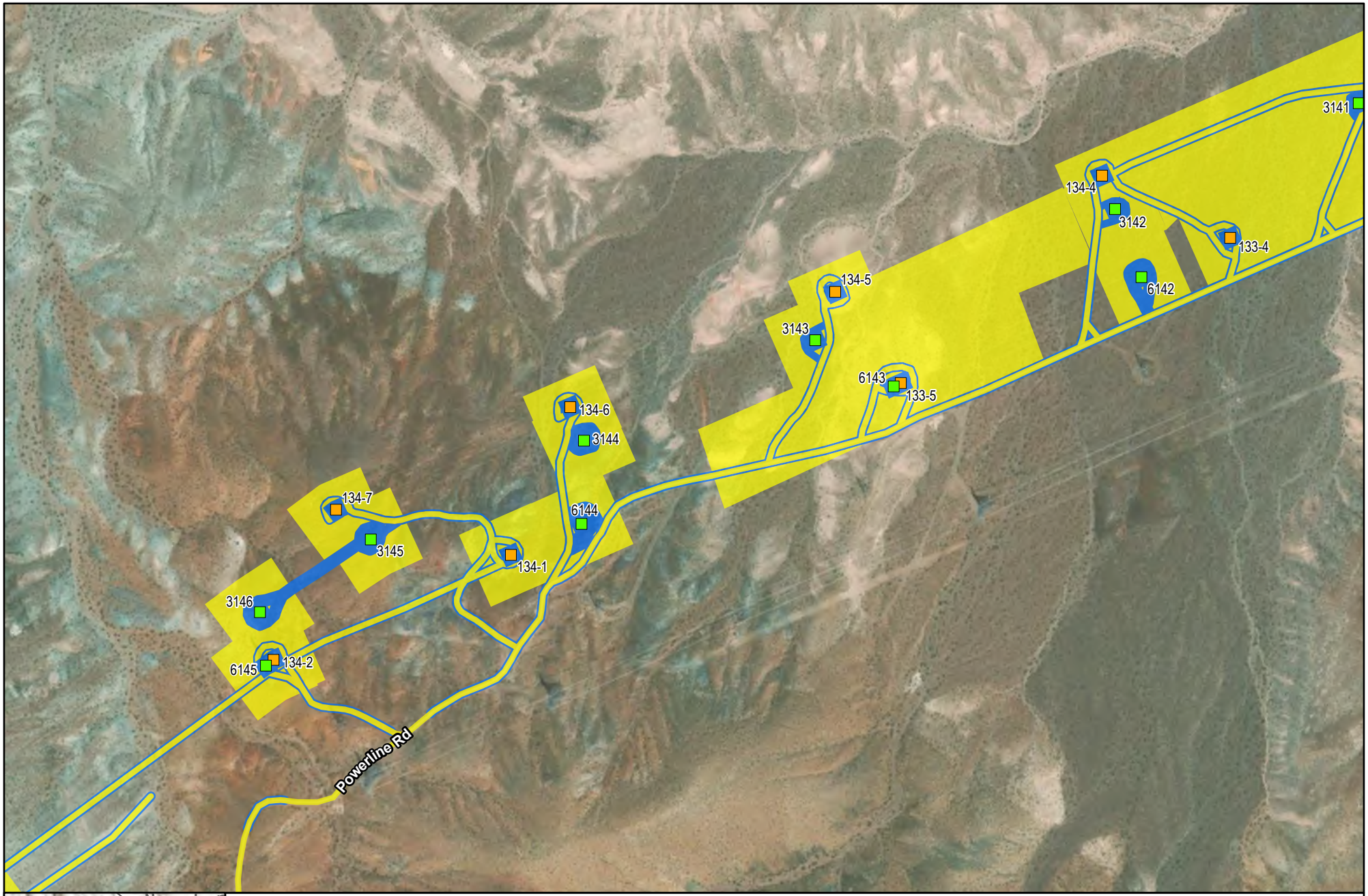

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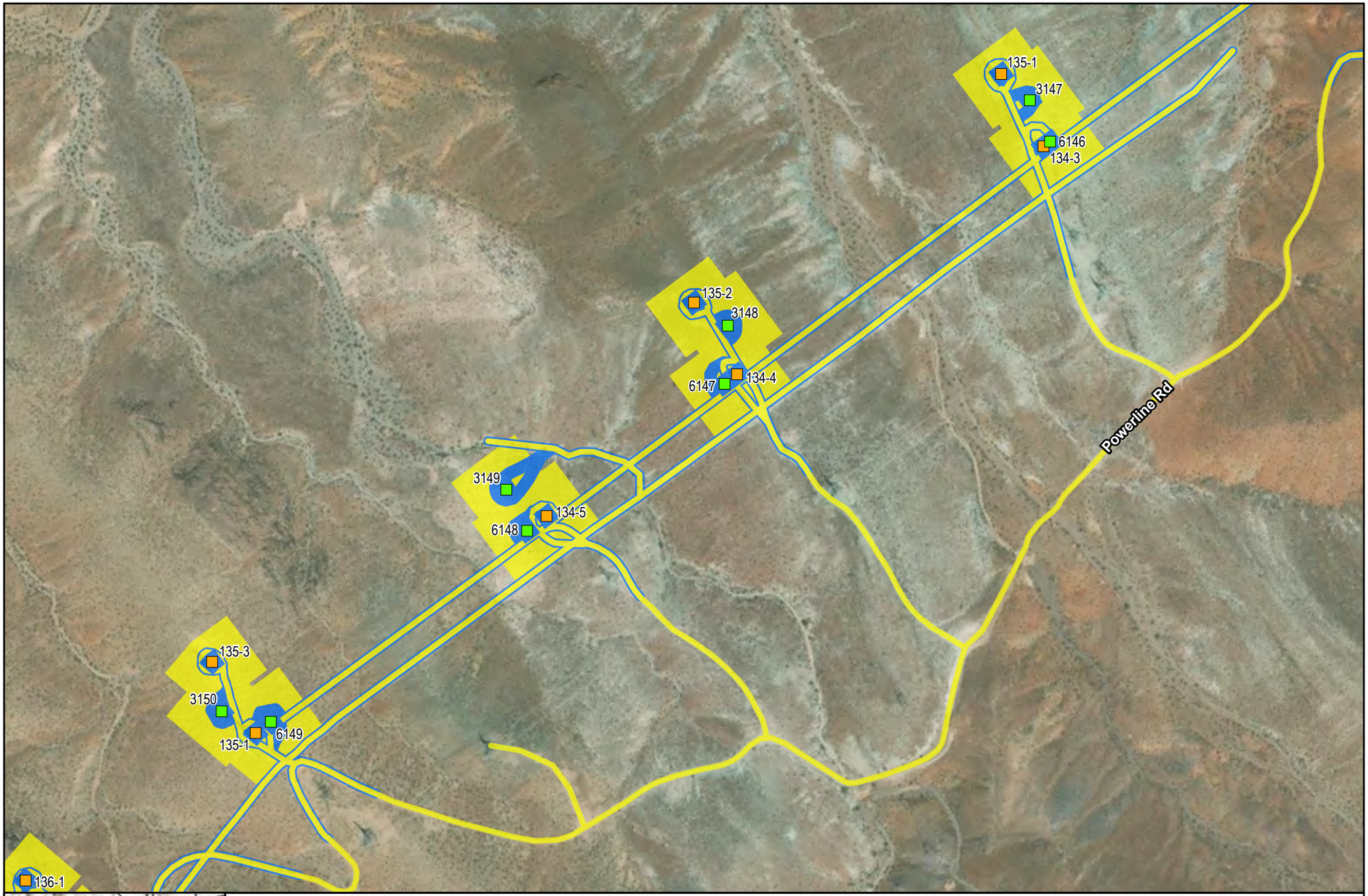

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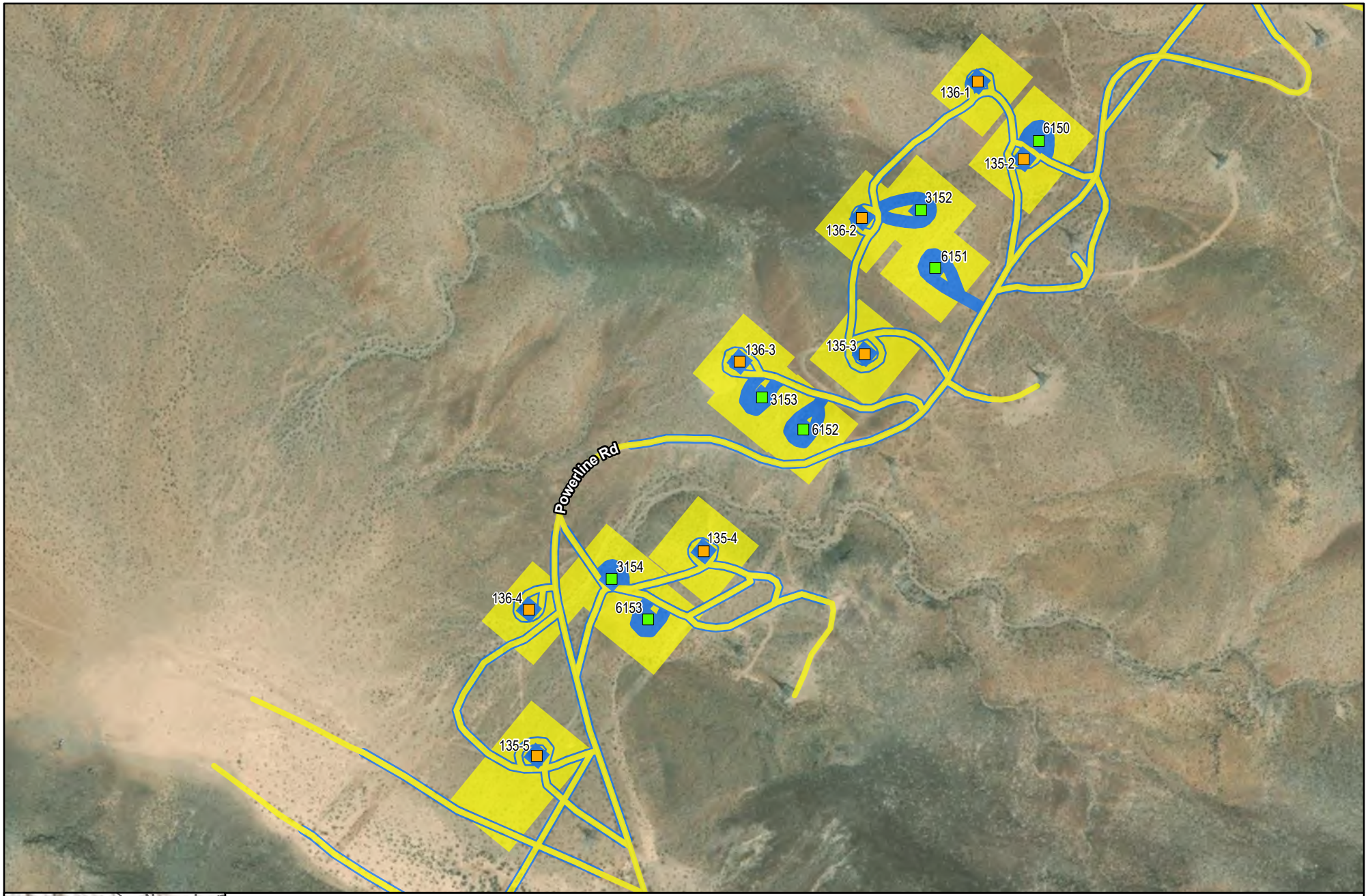

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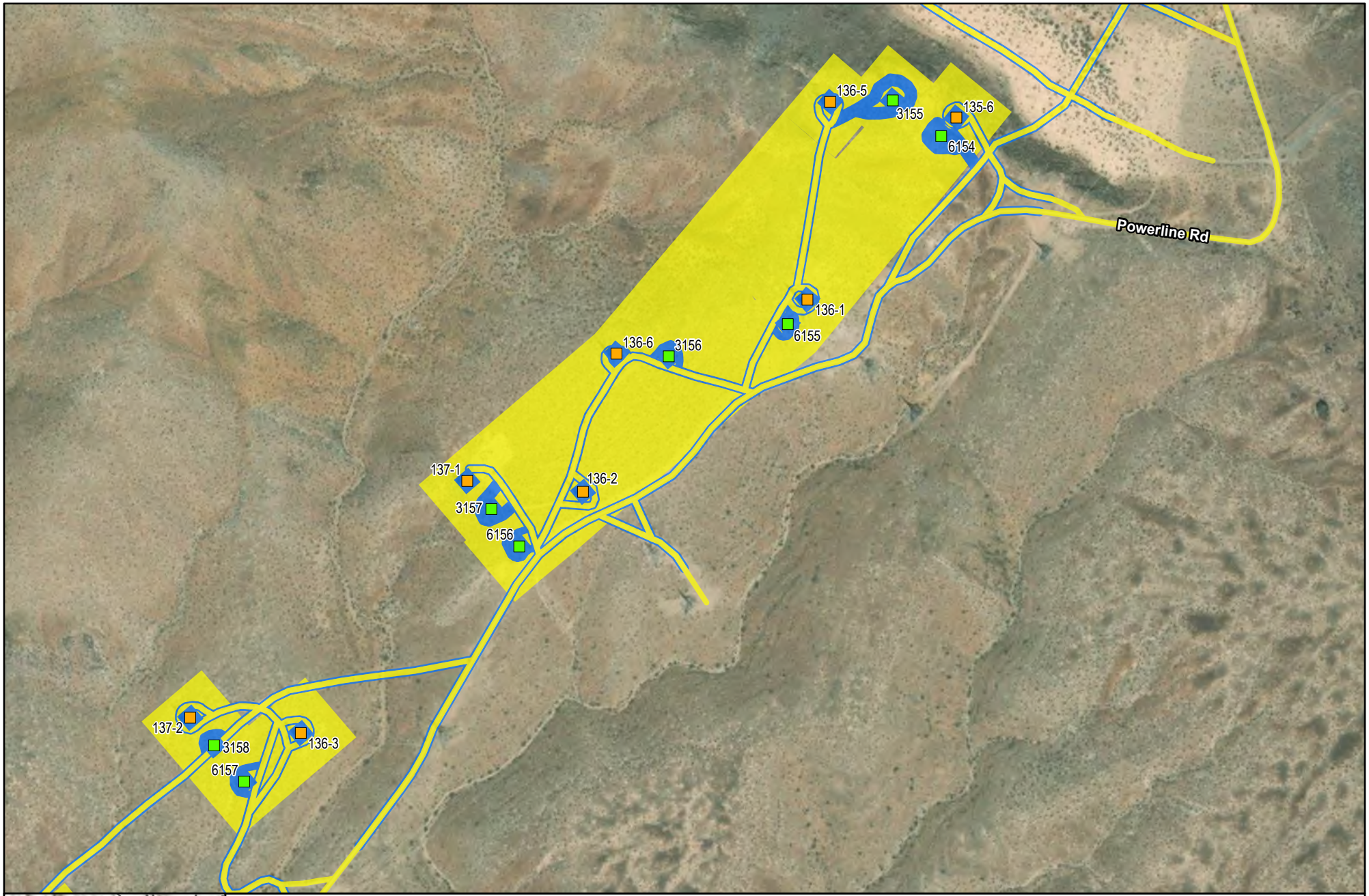

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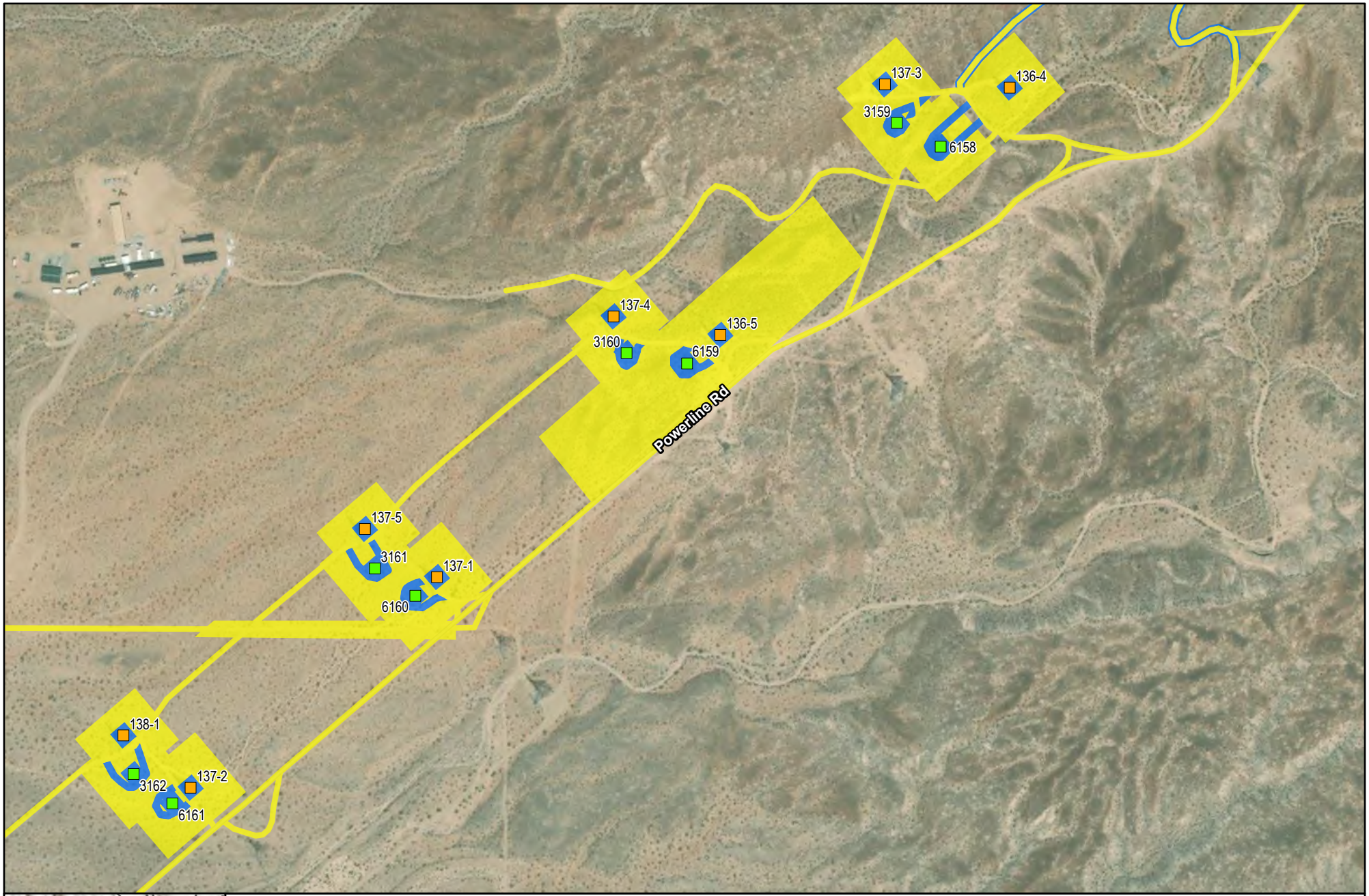

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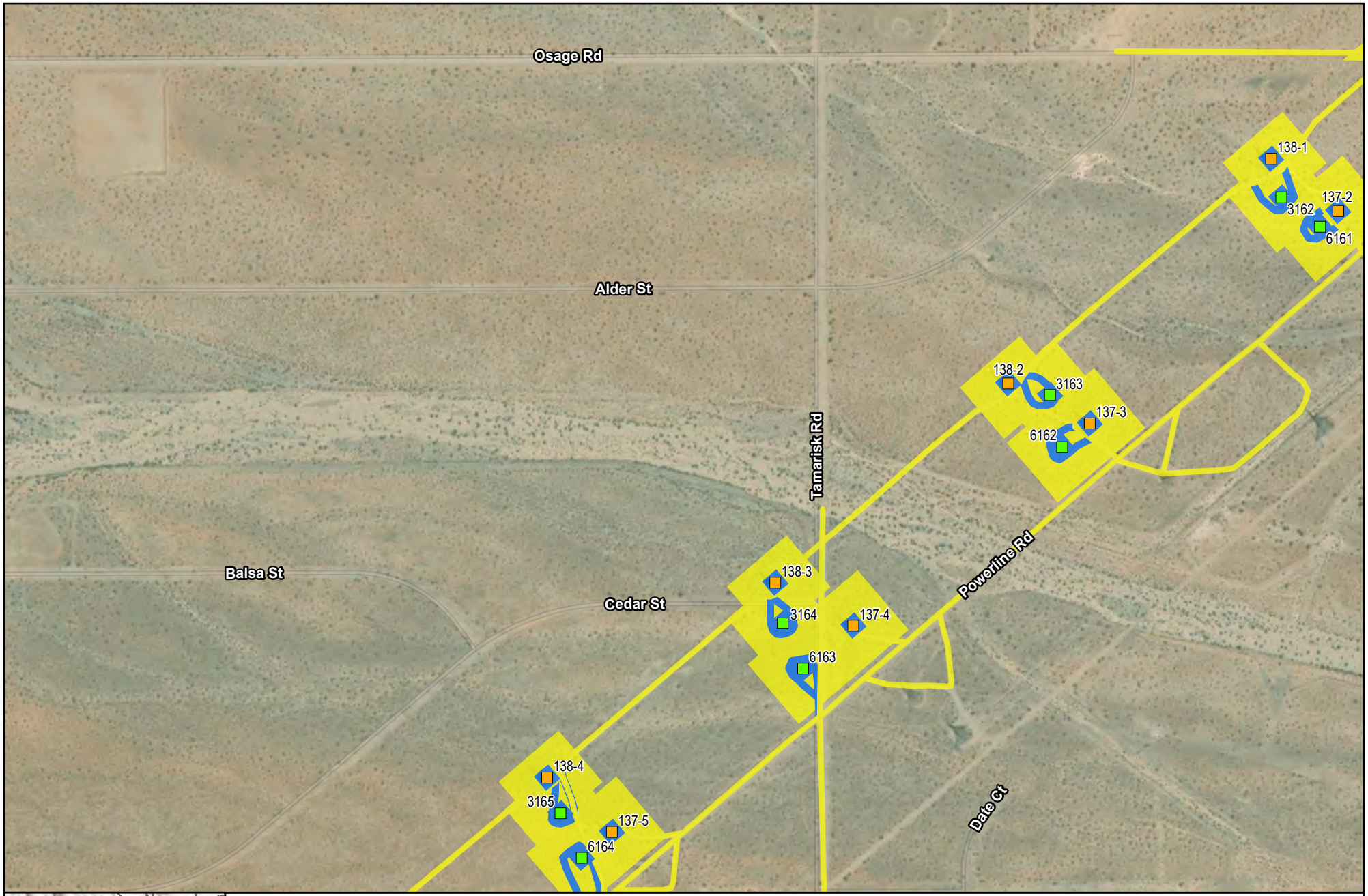

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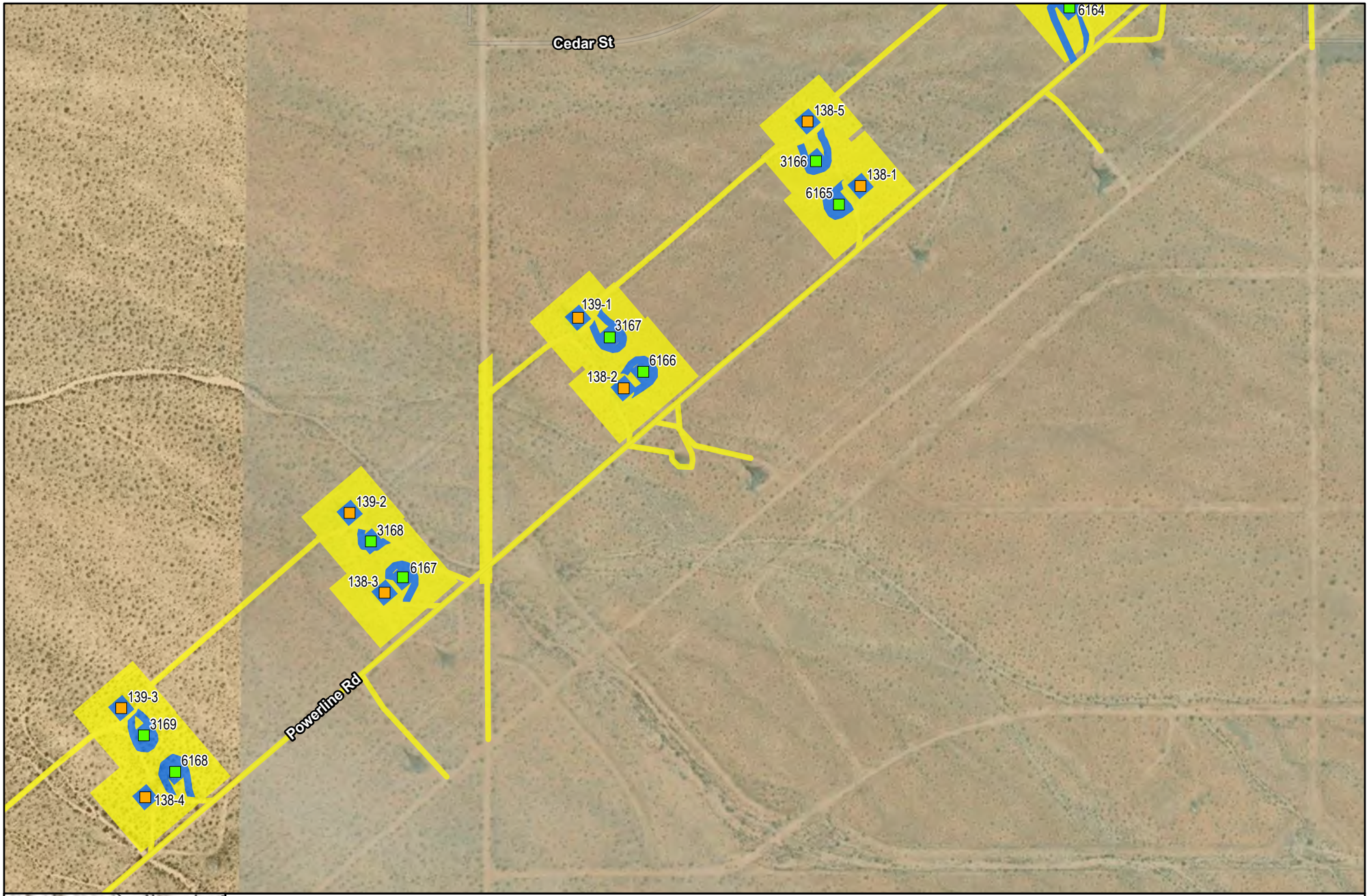

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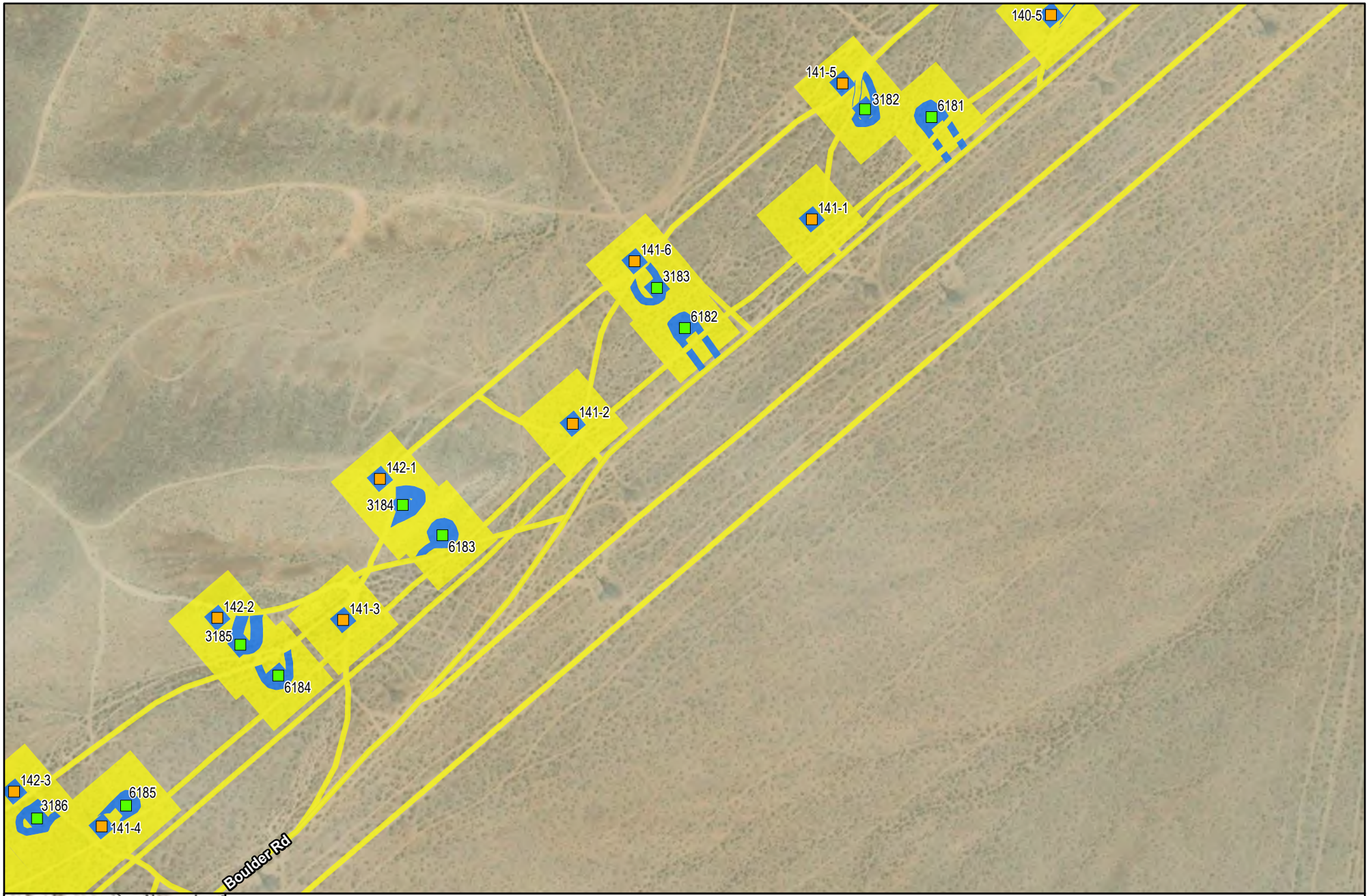

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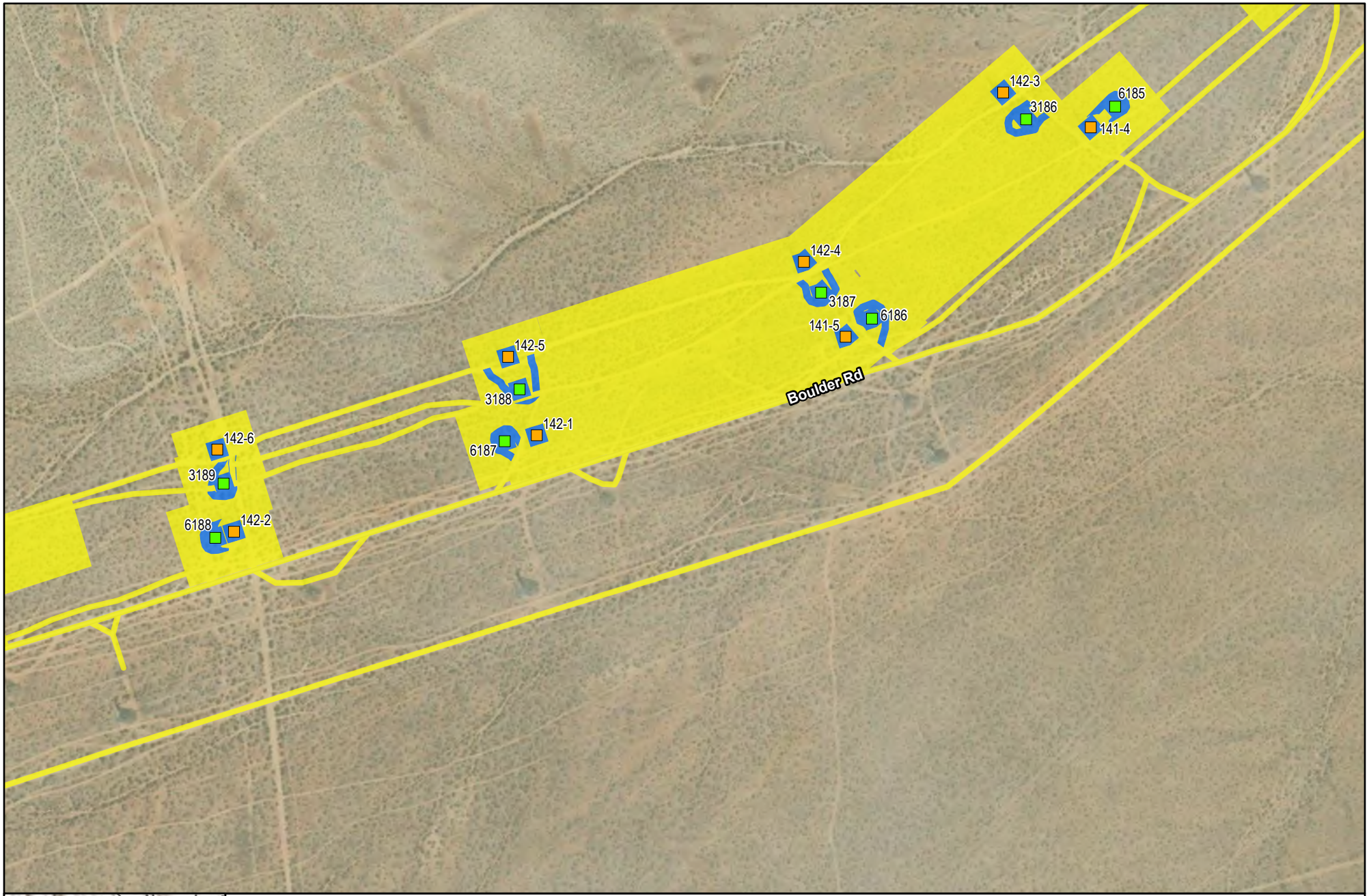

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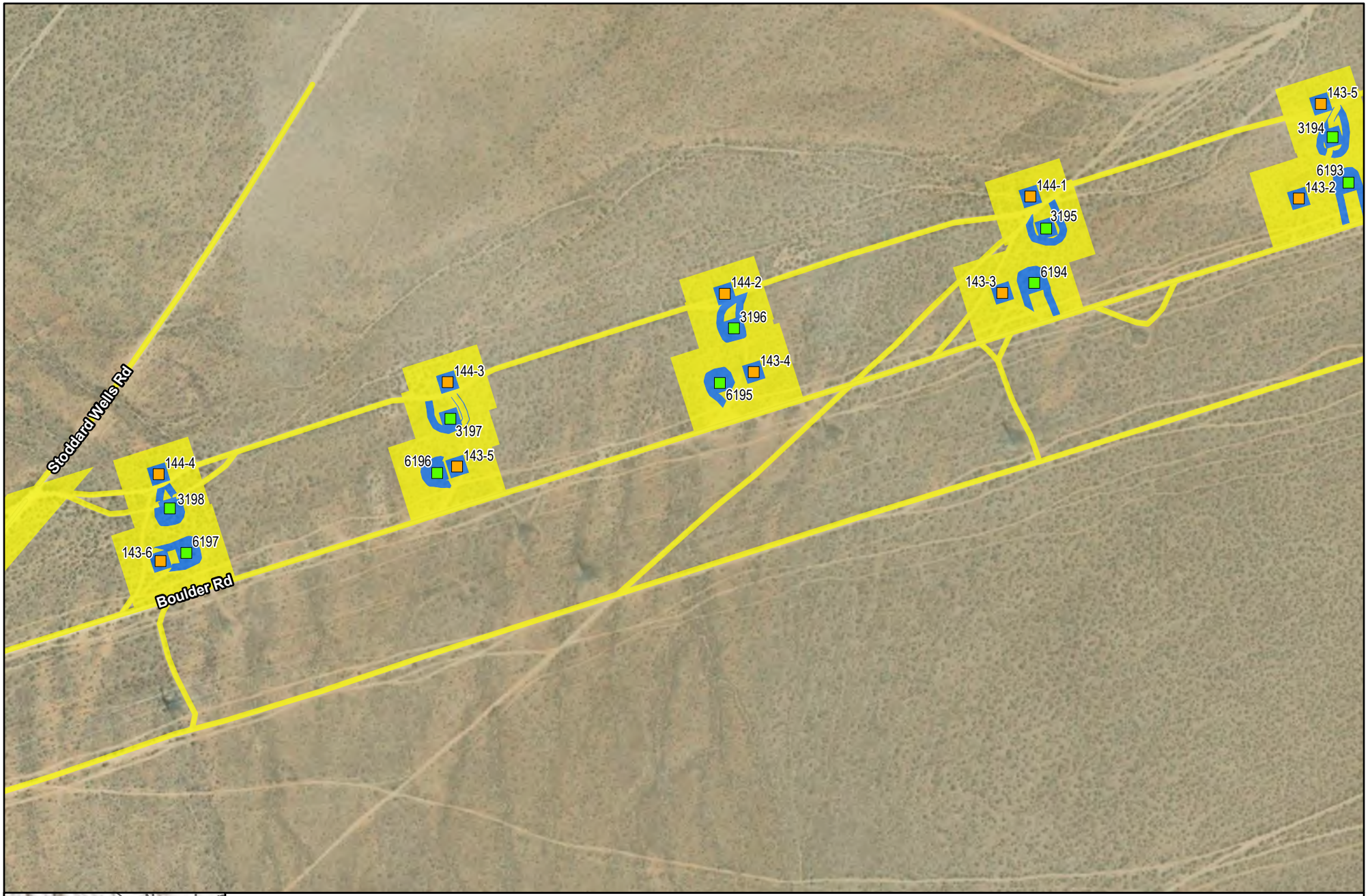

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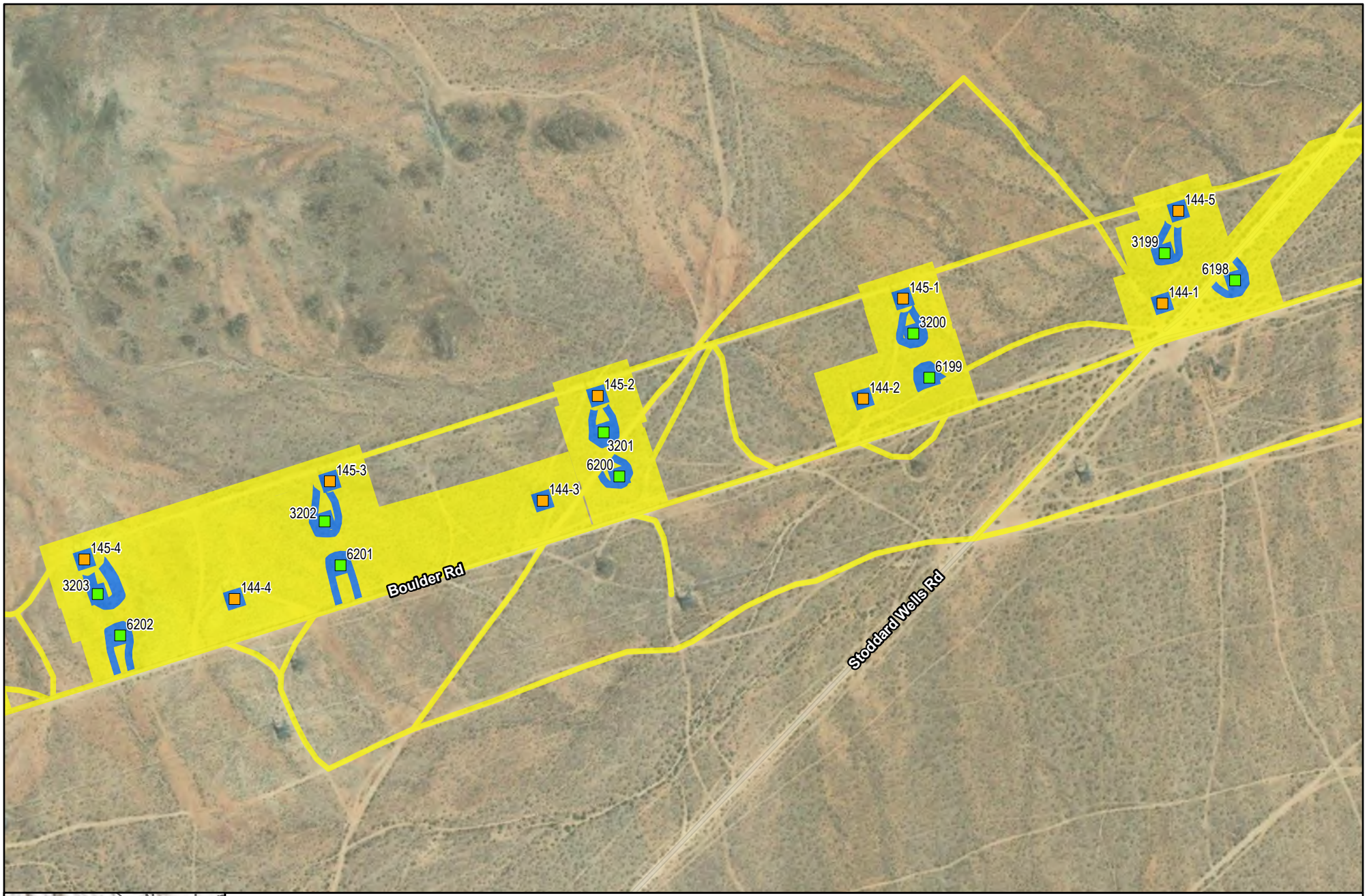

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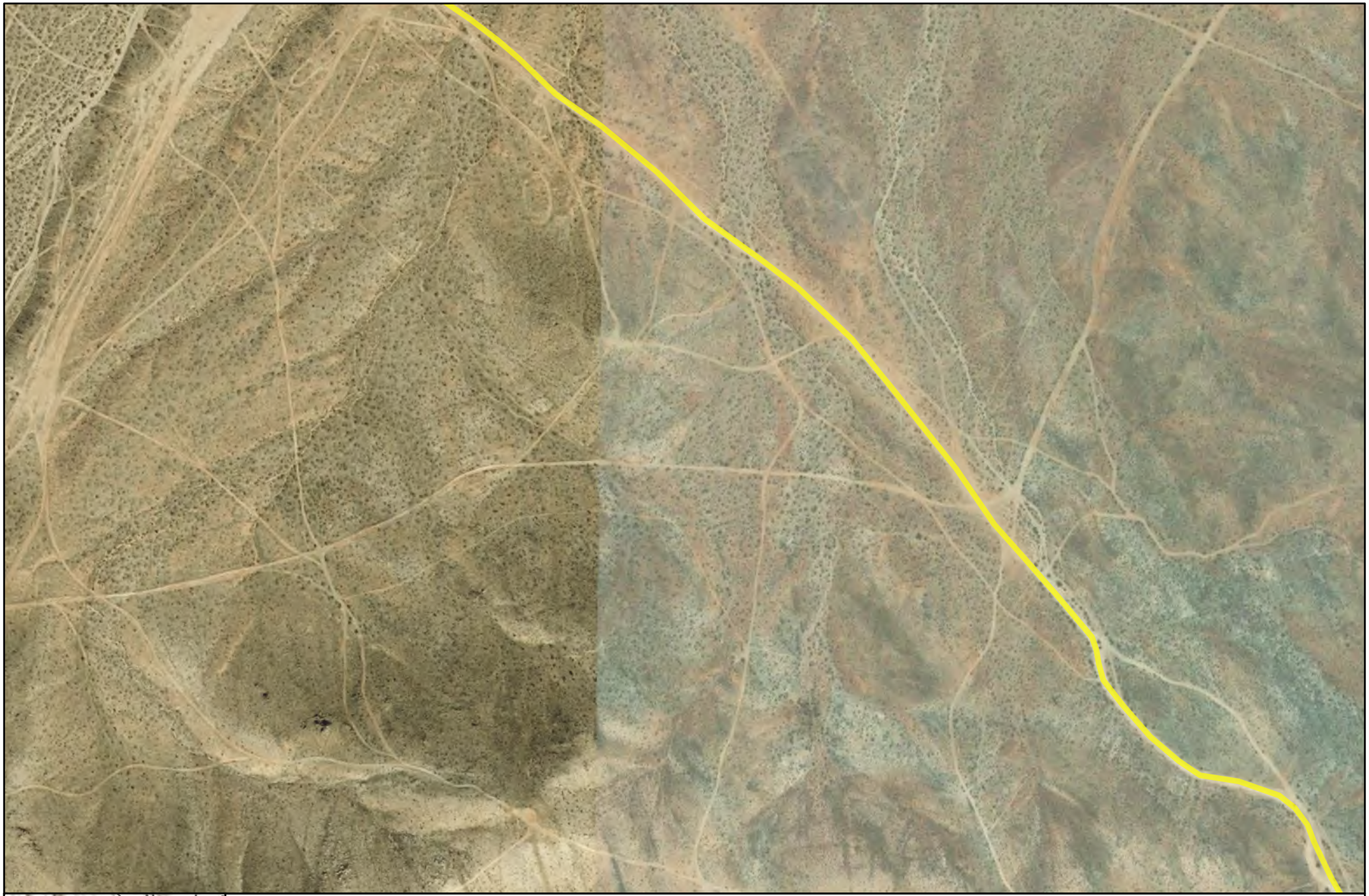

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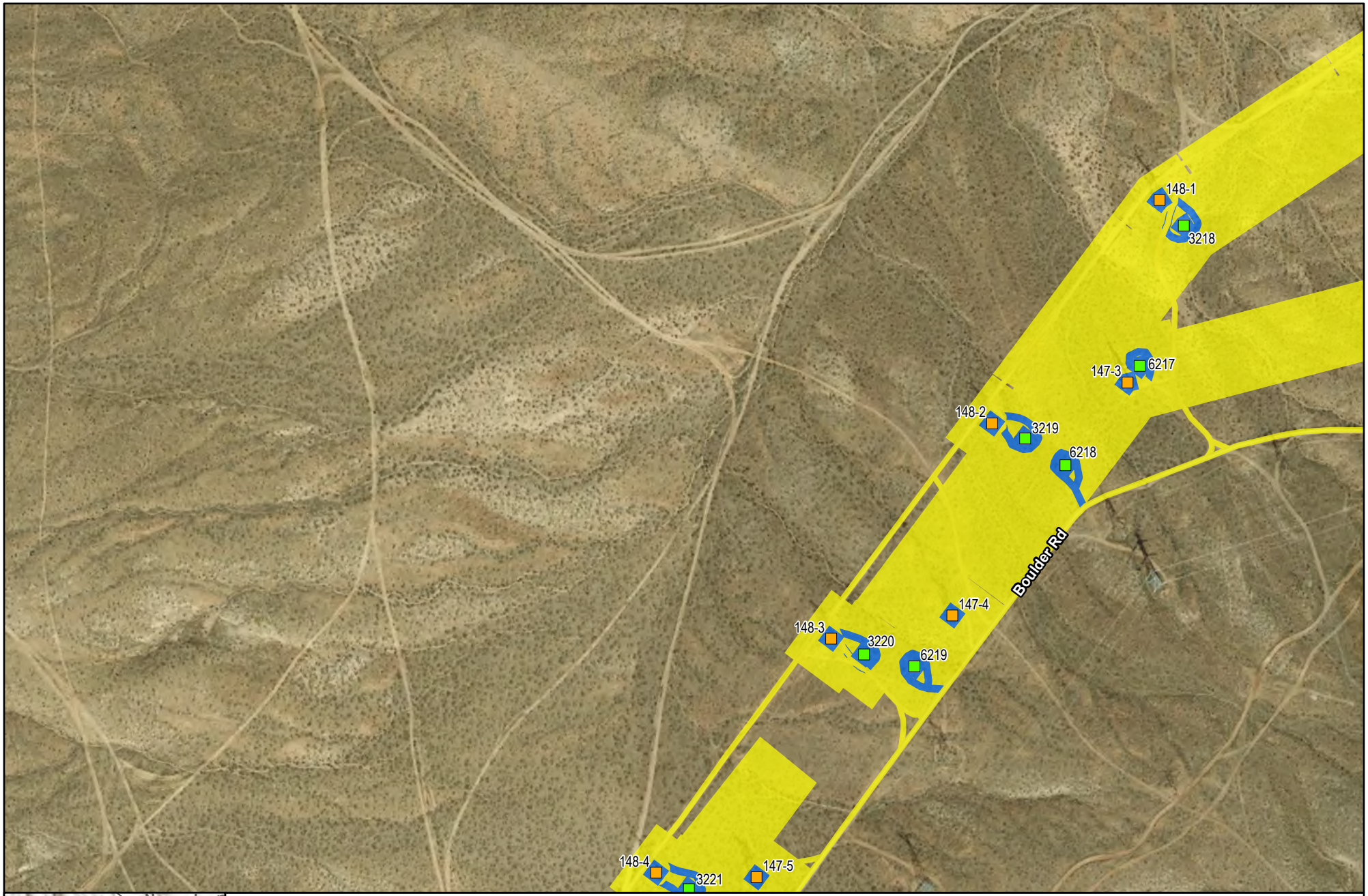

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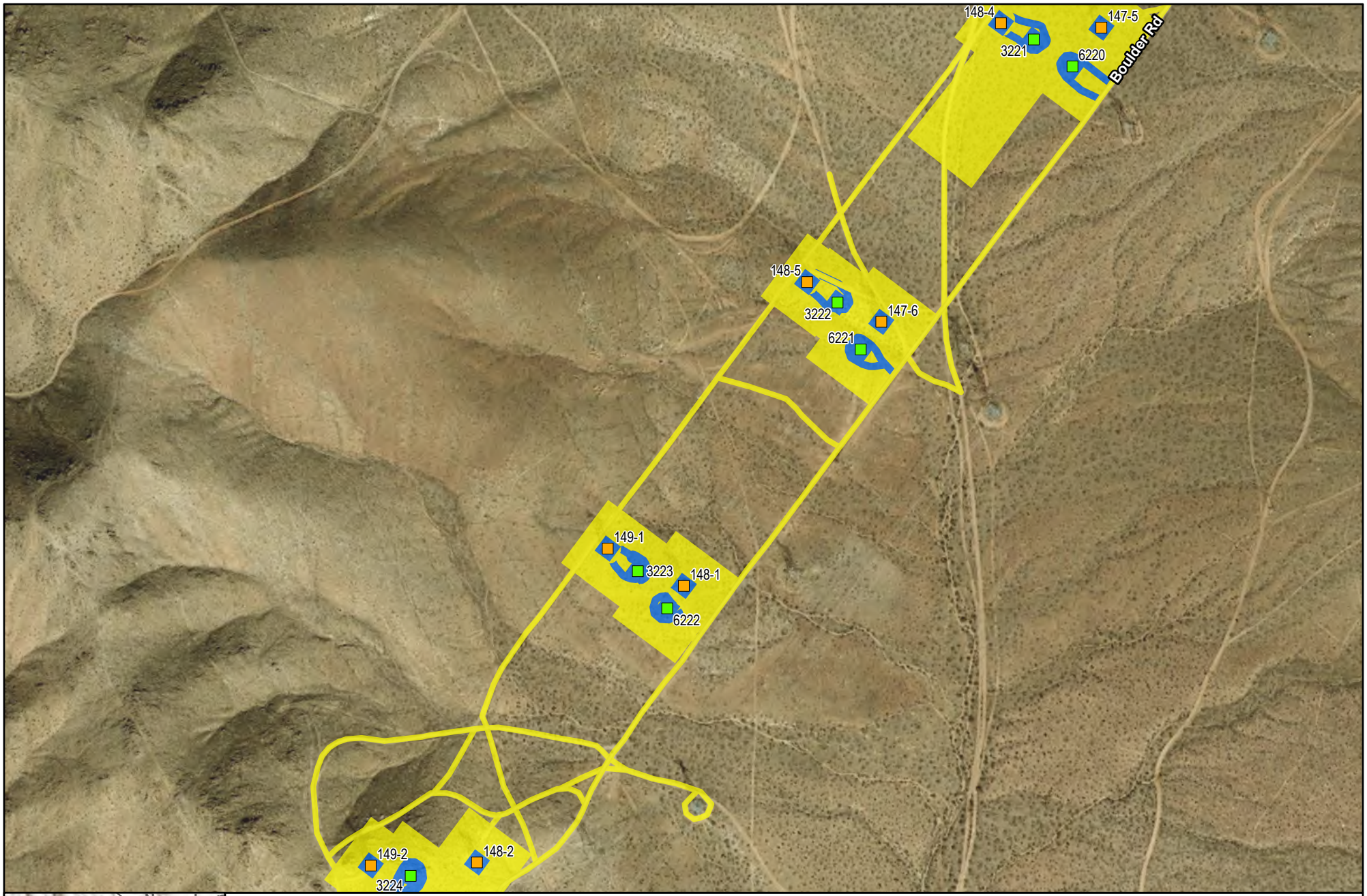

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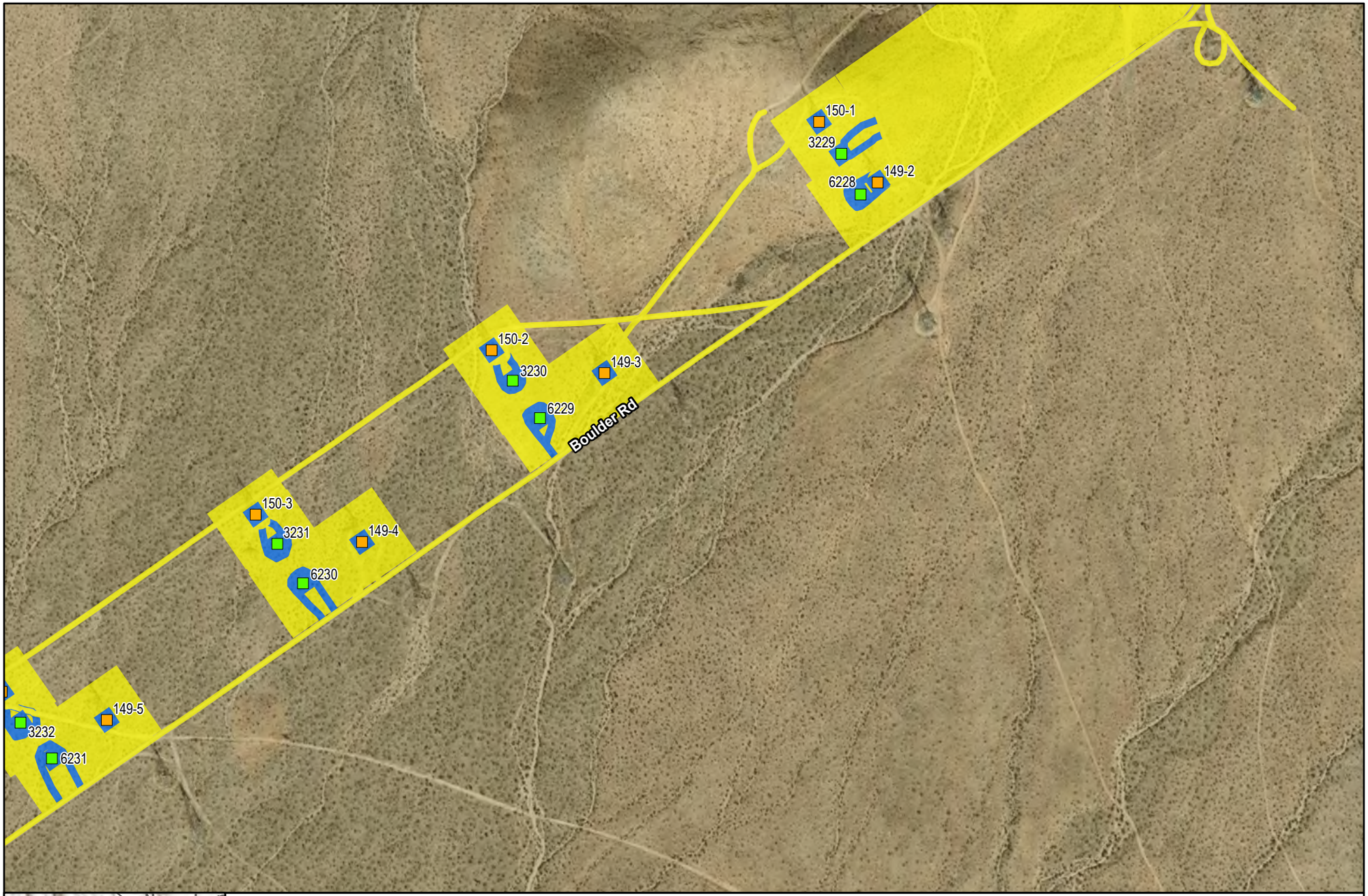

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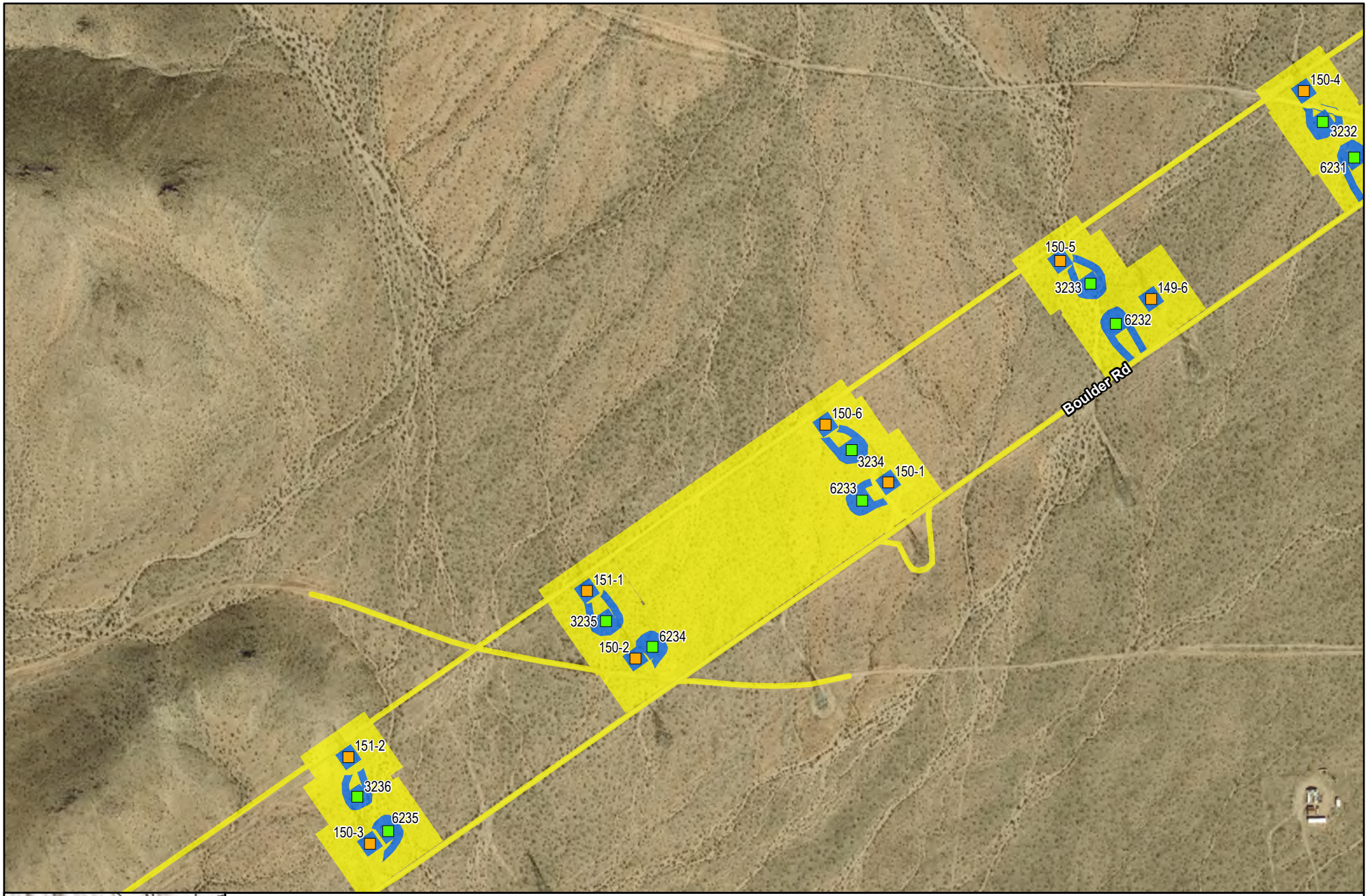

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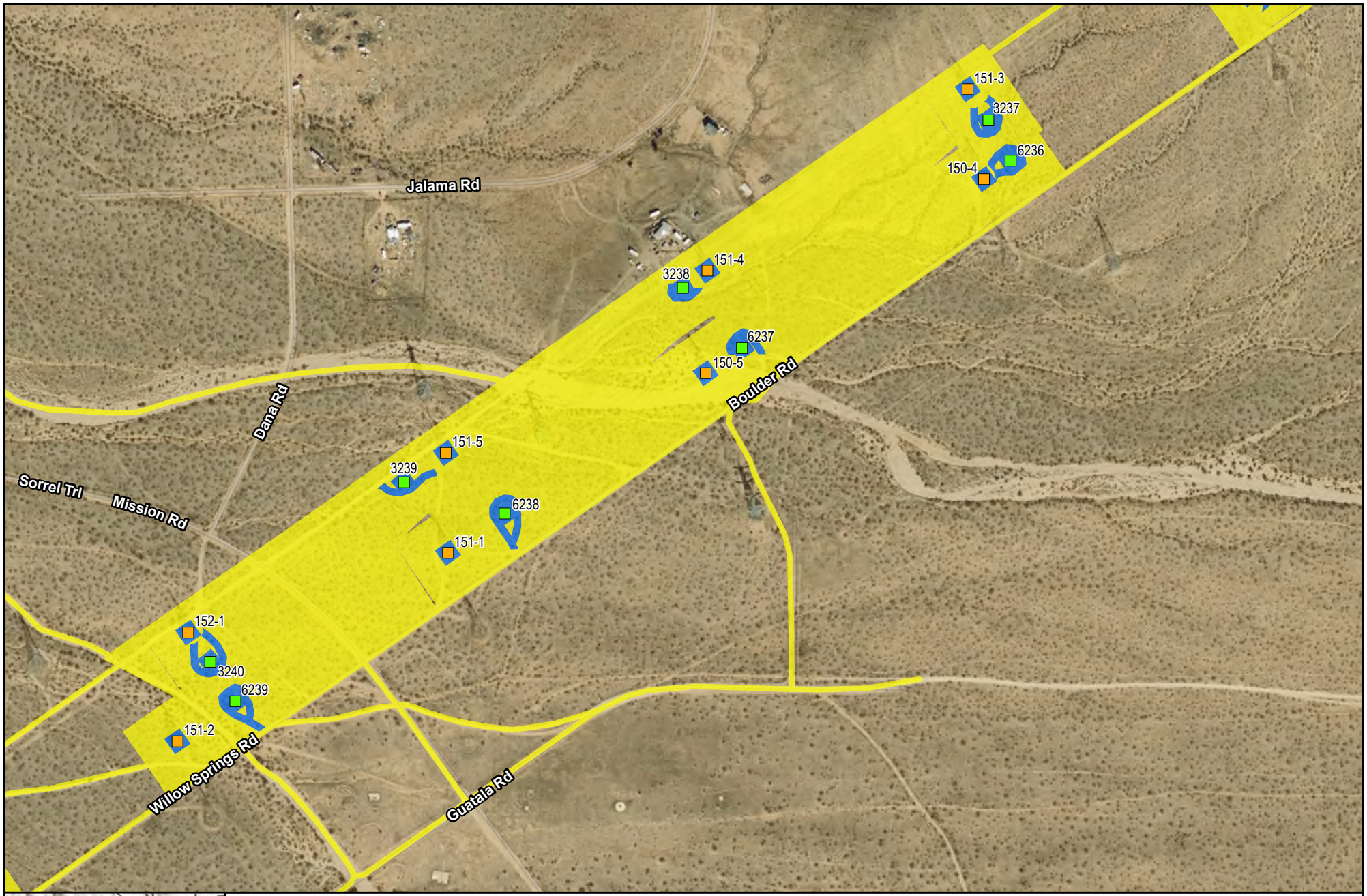

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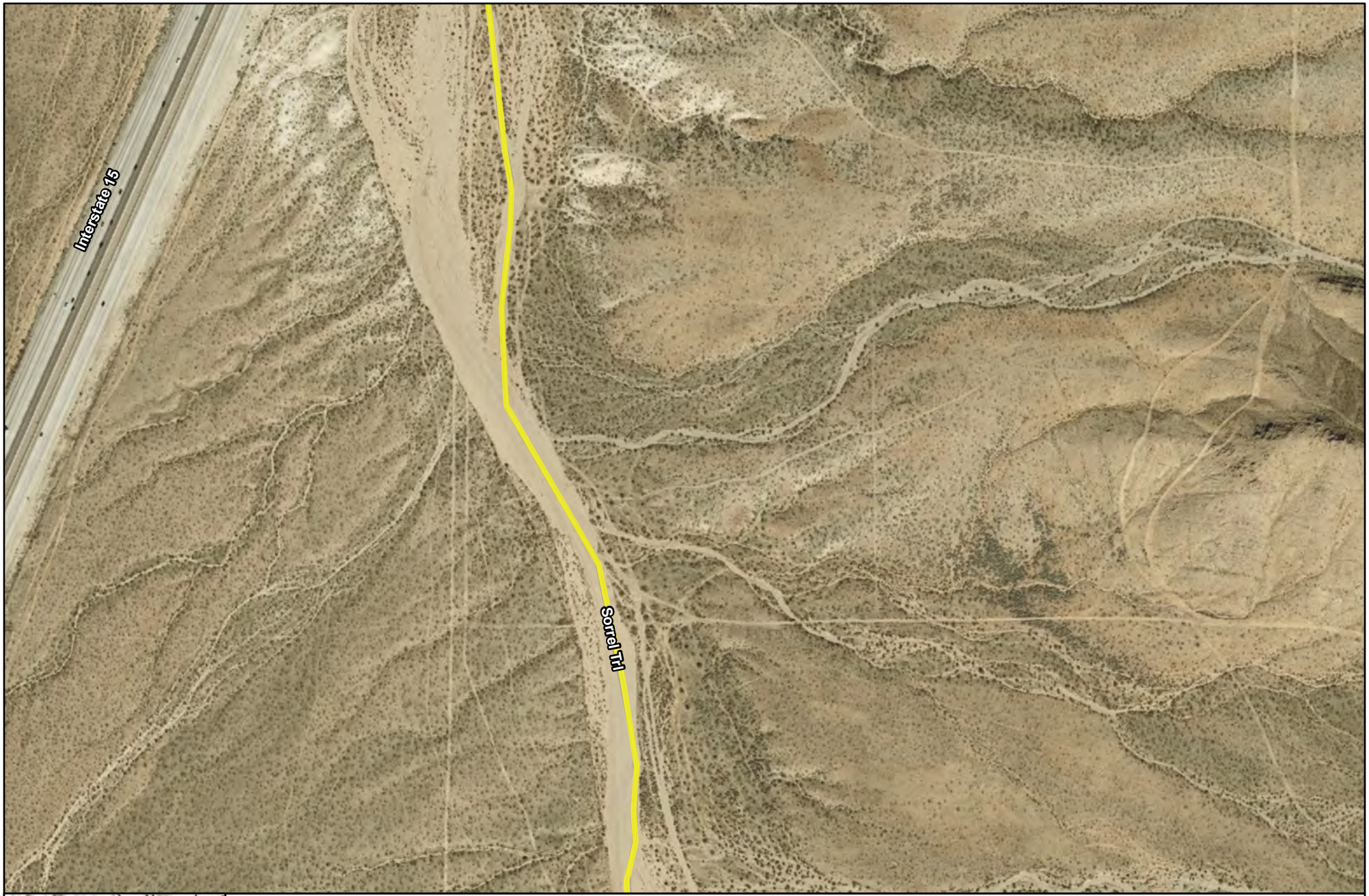

LA DWP

N

Temporary Impact

0 500 Feet

FIGURE 3
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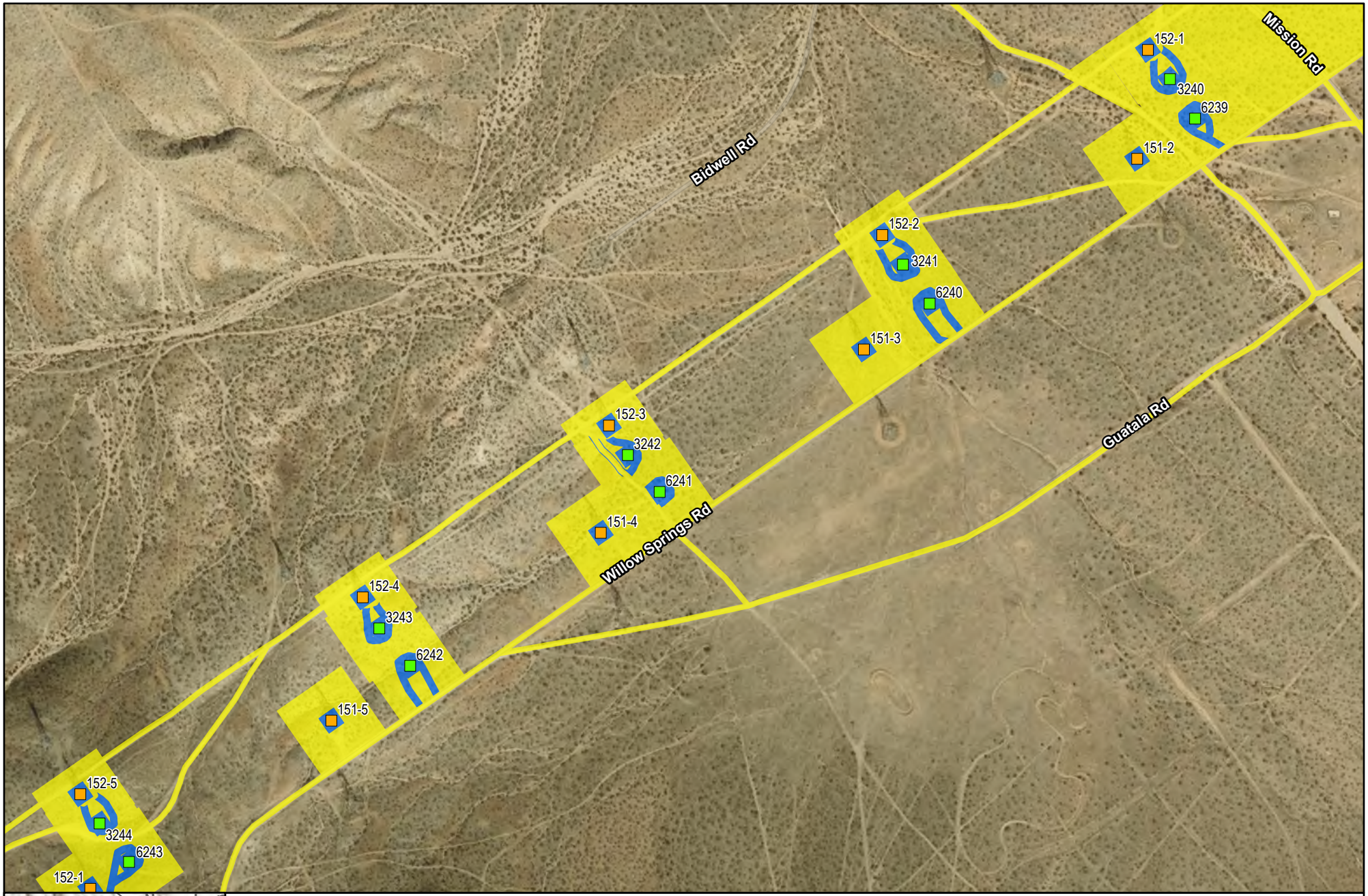

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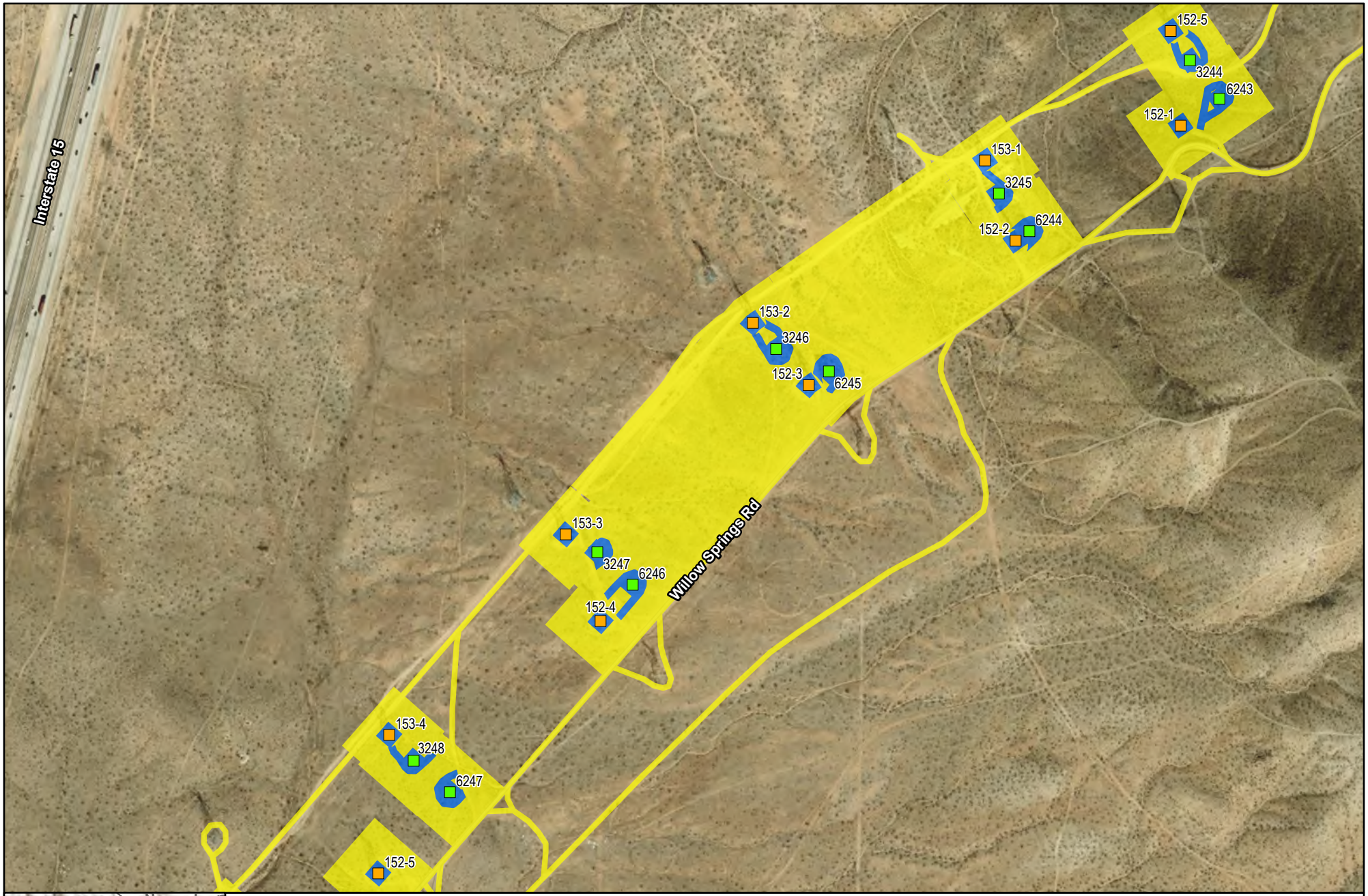

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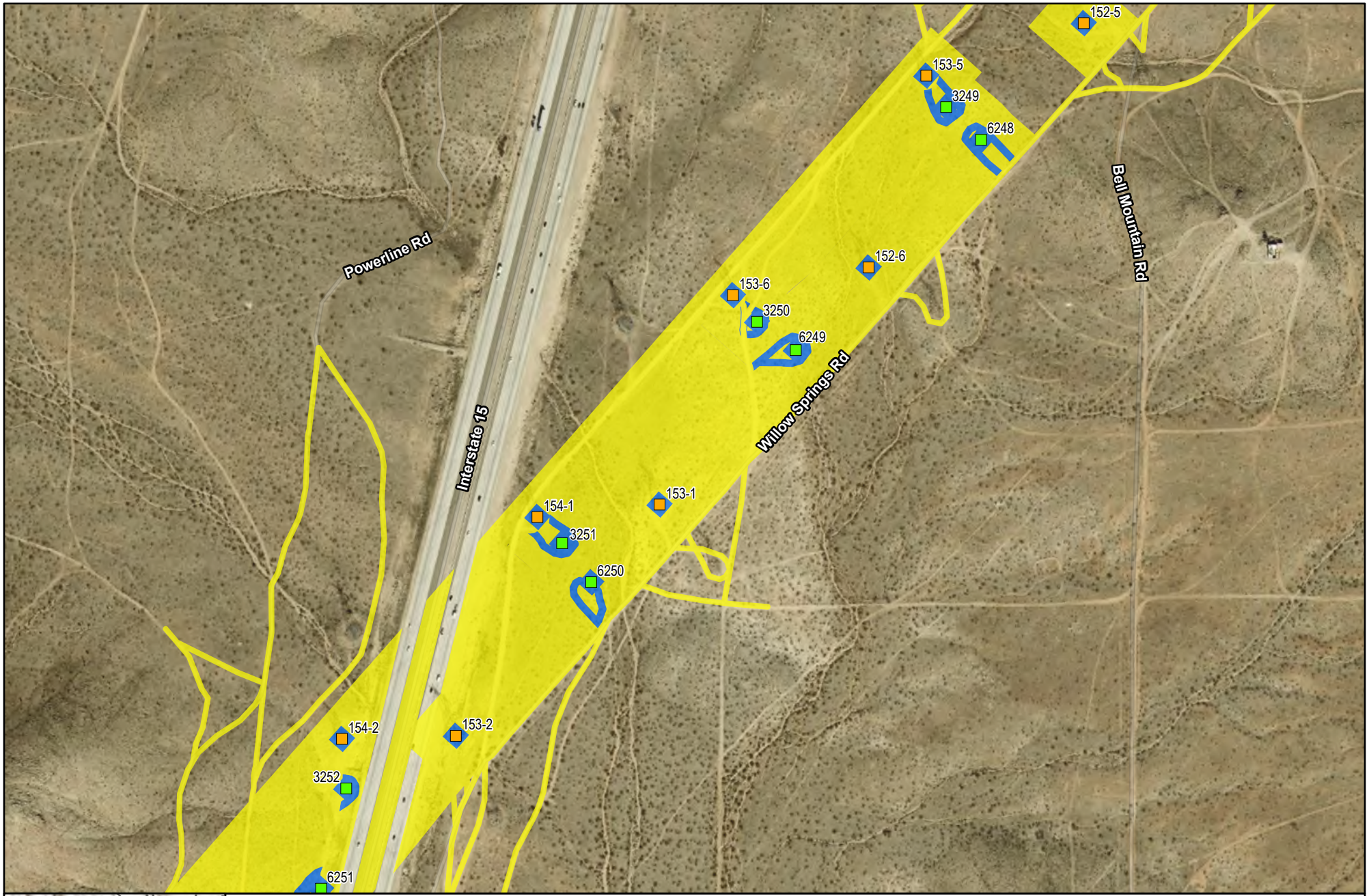

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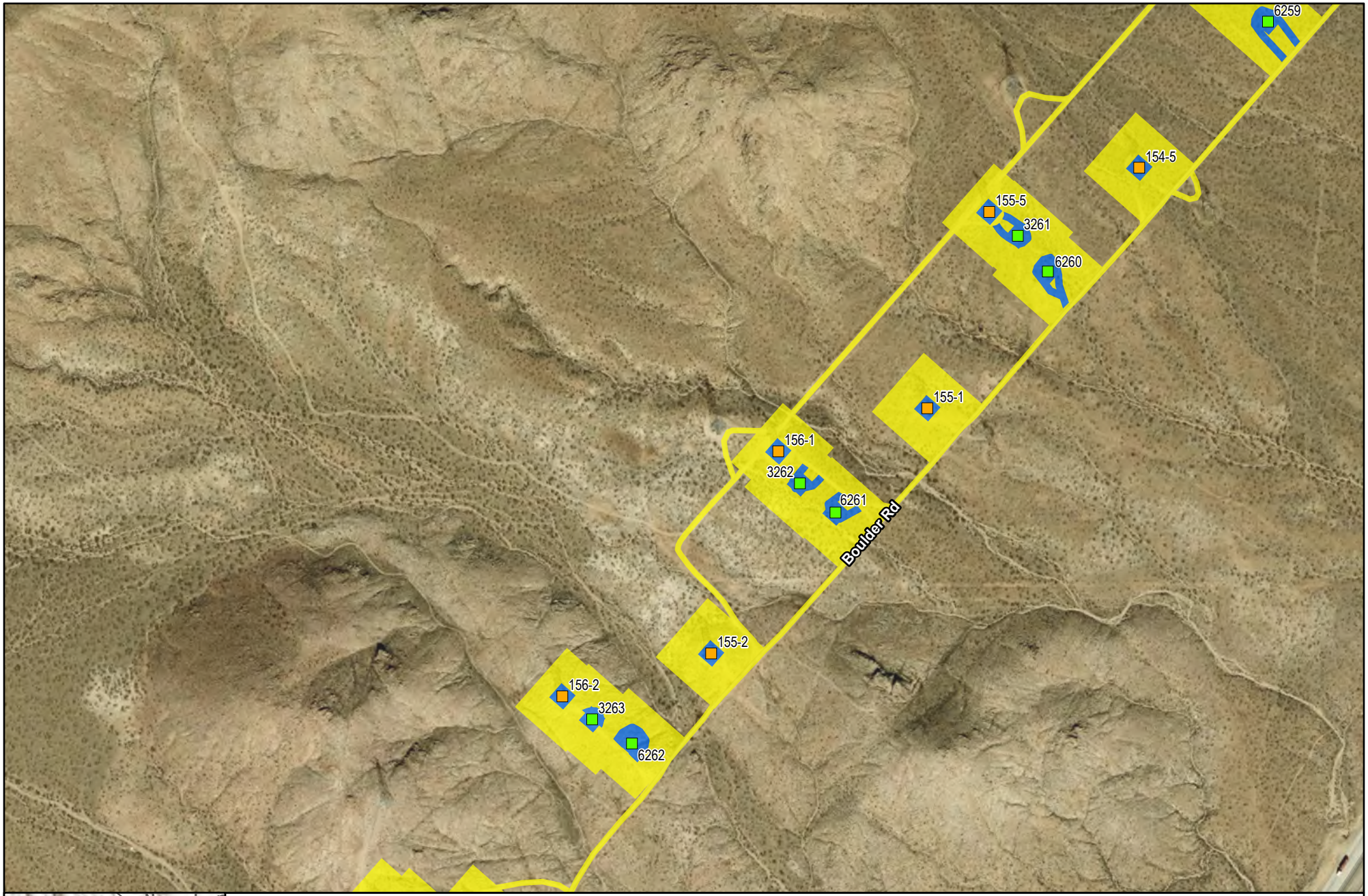

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Data Sources: LADWP, 2026; Aspen, 2026; Esri, 2026. Spatial Reference: NAD 1983 UTM Zone 11N Date Exported: 6/10/2026
This product reflects geospatial analysis only and is not a substitute for authoritative boundary determinations.

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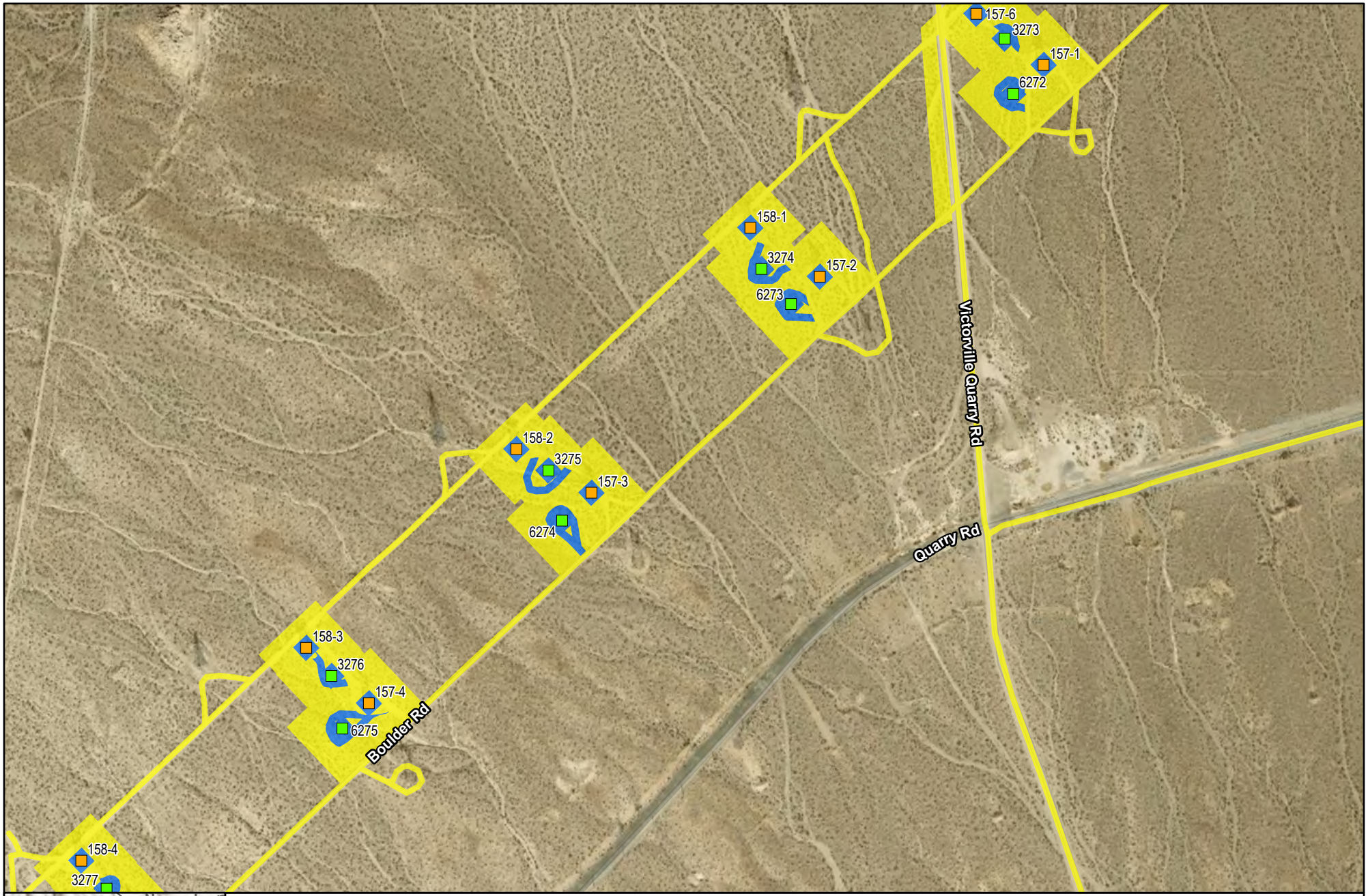

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