



U.S. Department of the Interior
Bureau of Land Management



Nevada-wide Resource Management Plan Revision

Preliminary Concept July 2021

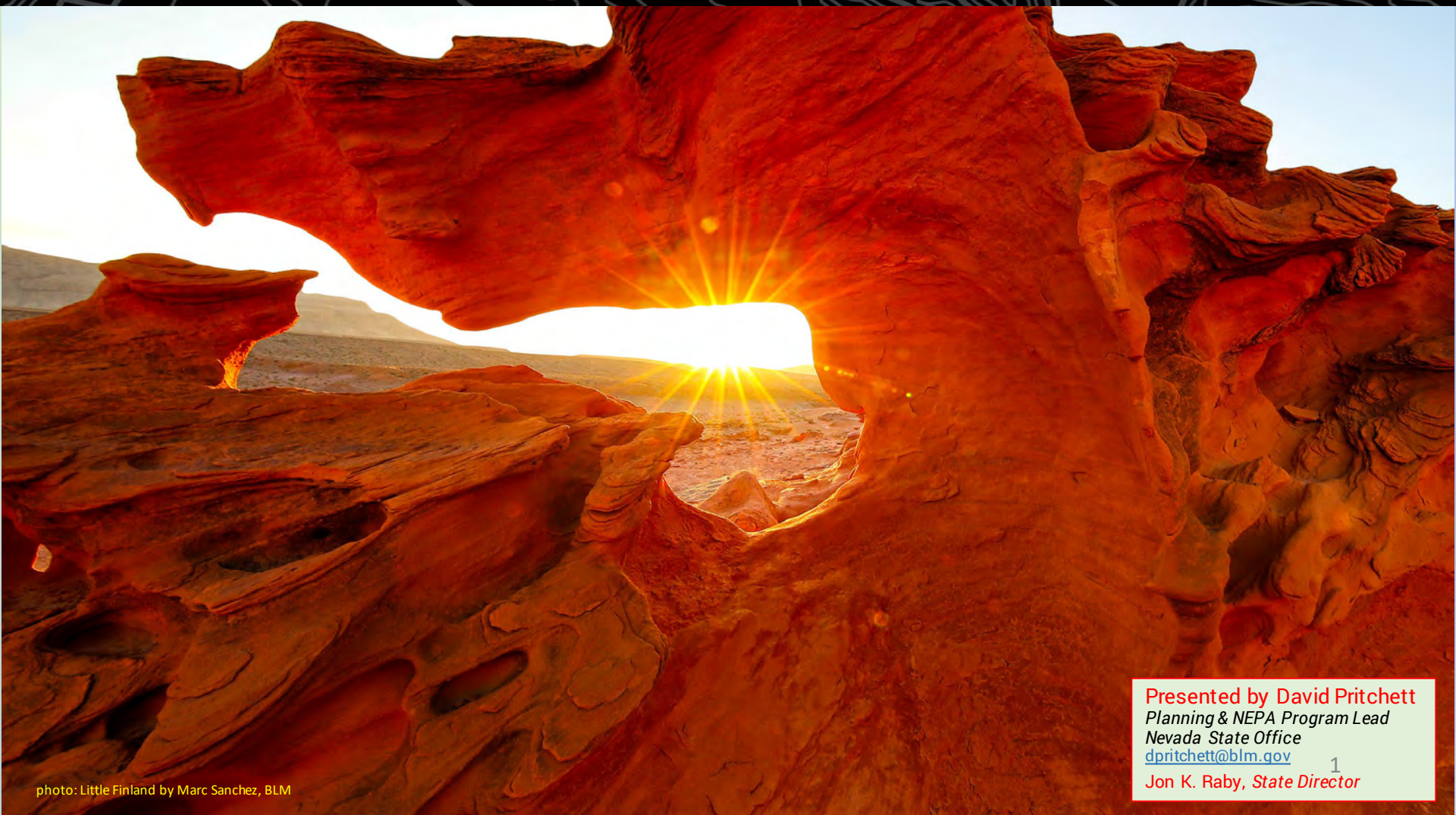


photo: Little Finland by Marc Sanchez, BLM

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Why BLM Planning ?



Law and Policy on Resource Management Planning

- *Inventories*, per Section 201: **Federal Land Policy and Management Act** (FLPMA) requires the BLM to **maintain on a continuing basis an inventory of all public lands** and their resources and other values.
- *Planning*, per FLPMA Section 202: The Secretary shall, with public involvement and consistent with the terms and conditions of this Act, develop, maintain, and, when appropriate, **revise land use plans which provide by tracts or areas** for the use of the public lands.

RMP purposes:

1. Allocate resources and determine appropriate multiple uses for the public lands;
2. Provide a strategy to manage and protect resources;
3. Establish systems to monitor and evaluate the health of resources and effectiveness of practices.

- Planning decisions are approved only by State Director (per **Delegation of Authorities**).
- Approved projects must conform to the applicable RMP or amend the RMP to allow them.
- NEPA process via an EIS
- FLPMA “Scenic” = Visual Resource(s)
- RMPs are like a public lands version of municipal zoning.

“The time to repair the roof is
when the sun is shining.”
– John F. Kennedy





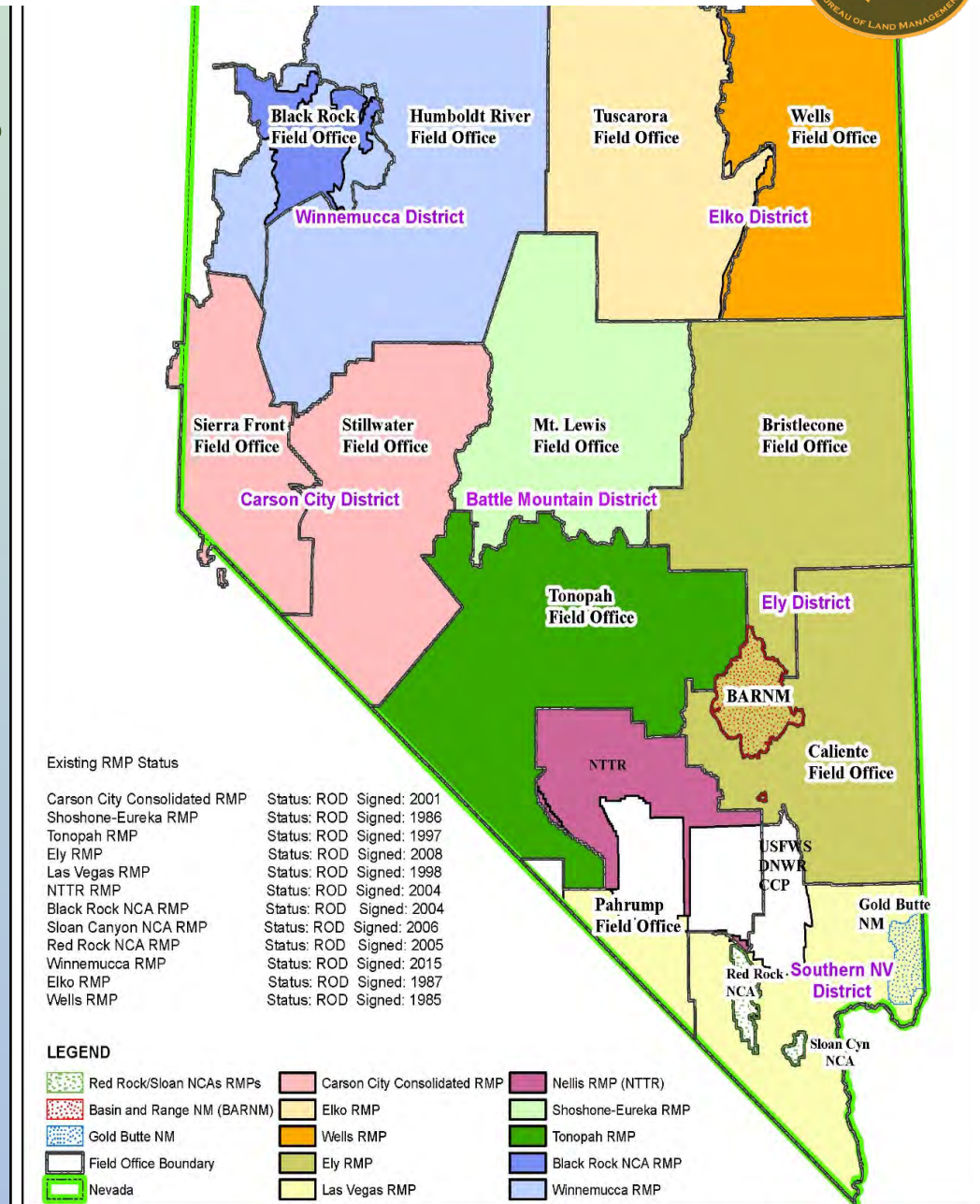
Current Status of Nevada Resource Management Plans

- 12 Current RMPs in-effect.
- Ages range 6 to 36 years, **average 21+ years old**.
- **4 RMPs in progress were suspended, paused, or terminated** (see later *Head Start* slide).
- BLM lands comprise approximately 48 million acres or 63% of Nevada area.
- Photovoltaic barely existed for oldest RMPs.
- RMP/EIS preparation time typically 7+ years, with many kinds of delays.
- Trend for old Field Office RMPs to be revised, combined, integrated as a District Office RMP.
- RMP as a project usually a **once-in a-career experience for BLM staffers** at their office.
- Draft and Final RMPs found at BLM **public webpage** (search: **blm +Nevada +planning**).

<https://www.blm.gov/programs/planning-and-nepa/plans-in-development/nevada>

"Plans are nothing; planning is everything."
—Dwight D. Eisenhower

July 2021, preliminary concept



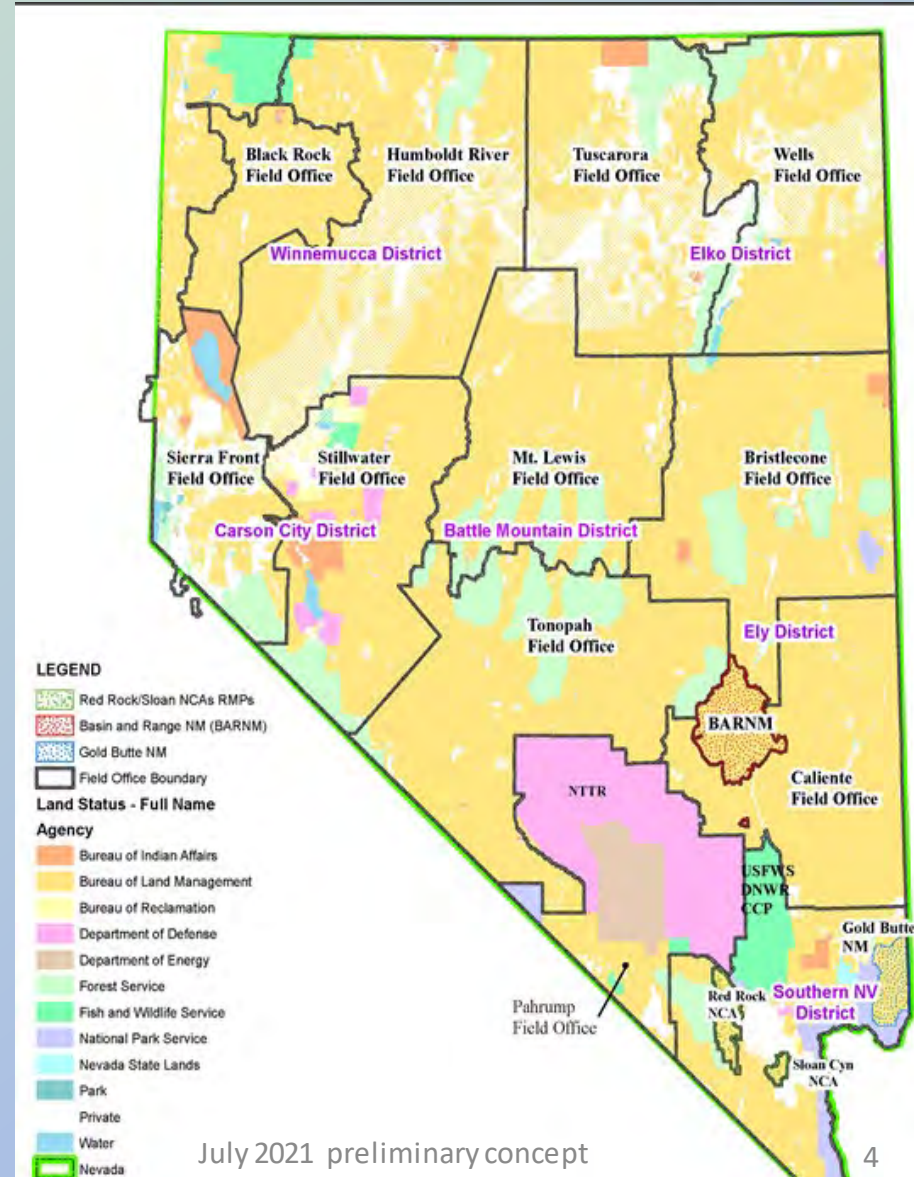


The Nevada-wide (Integrated) RMP Revision

- Effort led by **Nevada State Office** (in Reno), with focused, efficient involvement by District / Field Offices.
- Organizational structure can be 2 different perspectives:
 - **One, single planning area RMP/EIS**, with up to 18 Records of Decision (RoDs) at a field-office scale, allowing local customization with local knowledge and local ownership of plan content;
 - **Or...** considering that each Record of Decision essentially **is** the Final Plan, prepare 16 to 18 separate RMPs/RoDs organized through a **single EIS** for efficiency of scale and schedule.
- Up to 18 separate RMP/RoDs would each cover:
 - **12 Field Offices** (some eventually could be combined into one RoD);
 - **3 National Conservation Areas** (Red Rock Canyon, Sloan Canyon, Black Rock Desert...);
 - **2 National Monuments** (Gold Butte, Basin and Range);
 - 1 Nevada Test & Training Range (NTTR, withdrawn to Air Force but still subject to an RMP).
- **Timeline Driver: BLM budget cycle with RMP funding as FY23 PTA budget as soon as October 2023...** (preference was to launch a year sooner for RMP to be completed during 2024 within current Prez Administration.
- **RMP Completion Goal: *October 2025 as now proposed*** for the Final RMP/EIS and its multiple RoDs at a field-office scale.

Precedents for Multiple Records of Decision from one RMP/EIS

- National Monuments and NCAs each must have a separate RoD, per policy.
- Recent examples elsewhere with multiple RoDs derived from one RMP/EIS: Western Oregon RMP (2016), Colorado (Kremmling/Glenwood RMP, 2015), Idaho (Cottonwood/Coeur d'Alene RMP, 2010), and others.
- Nevada BLM proposal (2015) as 3 RMPs in Nevada, per each Resource Advisory Committee boundary that aligns with multiple Counties, as described in *Field Committee White Paper on Planning Unit Boundaries*.





Nevada-wide RMP by the Numbers

Nevada Office Area Name	Planning Area (acres)	Decision Area (Surface Lands ac.)	Current Resource Management Plan in Effect	Approval Date	RMP age in 2023 (years)
Stillwater Field Office	5,222,618	3,575,069	Carson City Consolidated RMP	2001	22
Sierra Front Field Office	3,500,863	1,146,768	Carson City Consolidated RMP	2001	22
Humboldt River Field Office	8,874,373	6,078,625	Winnemucca District RMP	2015	8
Black Rock Field Office	2,452,018	2,359,020	Winnemucca District RMP	2015	8
Black Rock Desert... National Conservation Area (NCA)	799,448	799,448	Black Rock Desert- High Rock Canyon- Emigrant Trails RMP	2004	19
Mount Lewis Field Office	5,801,429	4,379,858	Shoshone-Eureka RMP	1986	37
Tonopah Field Office	7,675,688	6,069,217	Tonopah RMP	1997	26
Wells Field Office	5,963,046	4,244,016	Wells RMP	1985	38
Tuscarora Field Office	6,258,436	3,197,880	Elko RMP	1987	36
Bristlecone Field Office	6,955,230	5,647,393	Ely RMP	2008	15
Caliente Field Office	5,211,753	5,065,357	Ely RMP	2008	15
Basin & Range Natl. Monument	708,024	703,586	Ely RMP	2008	15
Las Vegas Field Office	4,490,627	2,092,791	Las Vegas RMP	1998	25
Pahrump Field Office	1,933,587	736,247	Las Vegas RMP	1998	25
Red Rock Canyon NCA	201,584	198,892	Red Rock Canyon NCA RMP	2005	18
Sloan Canyon NCA	48,402	48,397	Sloan Canyon National Conservation Area RMP	2006	17
Gold Butte National Monument	285,157	285,157	Las Vegas RMP	1998	25
Nevada Test and Training Range	2,108,289	2,108,289	Nevada Test and Training Range (NTTR) RMP	2004	19
Total Acreage	68,490,572	48,736,009	RMPs average age, when the Revision launches in year 2023		22

- Nevada-wide RMP *Decision Area* of 48.736 million acres covers 69% of State of Nevada (which is 70.766 million acres).
- Or, 71% of whole State is subject to an RMP by either Nevada, California, (in NW Washoe County), or Idaho (north Elko County) BLM State Offices.
- Nevada-wide RMP Revision would cover more land than any other RMP, including Alaska BS-WI (2021, 62.3 M ac. Plan Area, 13.5 M ac. Decision Area).



Advantages of a Single RMP Revision

- **Efficiency of scale** to meet timeline goal for completion by **October 2025**.
- Implements **recent Executive Orders** and meets **Department of Interior Priorities**.
- Brings half the current RMPs into the 21st Century --including Elko and Battle Mountain Districts, which are still living in the '80s-- while resolving RMPs that no longer address current issues.
- Avoids continuations of serial, **piecemeal RMP amendments**, such as for Winnemucca District Visual Resource Management and Southern Nevada District land disposals.
- Assures **consistency throughout Nevada** for criteria, such as leasing or permit stipulations.
- Harmonizes with concurrent planning to start by **Humboldt-Toiyabe National Forest**, covering 5.6 million acres of mountain ranges in Nevada surrounded by BLM lands.
- Incorporates existing, disjointed RMP Amendments into a single plan, including the widespread Greater Sage-Grouse Plan Amendment of 2015, which functions like a separate planning overlay.
- Integrates latest standards for geospatial and corporate data, accessible through a map-based public website that can be continuously updated as a “living document” encapsulating future amendments.
- Reduces risk and adds specificity to **RMP conformance statements** that may be based upon overly broad and outdated criteria in older RMPs.
- Satisfies long **pent-up demand** for updated, revised RMPs. ***Finally gets it done.***

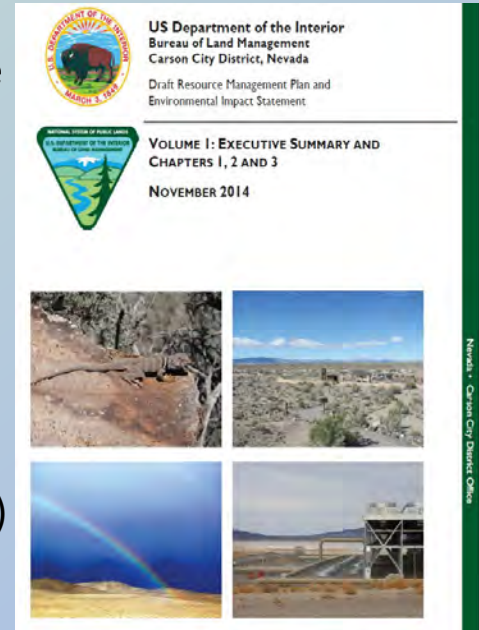
Potential Disadvantages & Risks of a Single RMP Revision

- Legal challenges may drag the whole RMP/EIS, although risk reduced with multiple RoDs.
- Funding continuity less certain for sequential Fiscal Year allocations.
- Workload heavy for Nevada State Office and increases for District Offices.
- Whole efforts seems too formidable for ambitious timeline, thus requiring a firm Project Manager.
- Implementation-level decisions would not fit into the RMP and would have to be separate later.



RMP Head Starts Already Underway

- **Carson City District**, Admin. Final RMP (suspended or paused, late 2018)
Final version needs to be re-arranged from among existing Alternatives, with some new priorities and designations added, such as solar sites along new GreenLink transmission corridors.
- **Southern Nevada District**, Revised Draft (EIS terminated, May 2019)
Revised Draft substantially completed, with complex habitat and groundwater modeling and numerous early amendments incorporated.
- **Battle Mountain District**, Admin. Draft (work ended 2016, contract de-ob.)
Started Chapters 1 to 3, plus data assembled still with contractor.
- **Basin and Range National Monument**, Admin. Draft (funds rescinded 2018)
Extensive resource inventories, travel management planning, preliminary Alternatives, and lengthy pre-Draft Assessment (AMS) completed.
- **Existing Small RMPs** for 3 NCAs and Nevada Test & Training Range (withdrawn to Air Force)
Planning allocations and management decisions likely would not change much for those small RMPs, to be verified and updated as needed within the whole Nevada-wide RMP Revision.
- **Resource Inventories and baseline data** already completed or in-progress throughout Nevada
Visual Resource, Wilderness Character, Greater Sage-Grouse habitat classes, travel routes, etc.
- **IMPLAN economic model** under development through *Nevada Economic Assessment Project*
Partnering with University of Nevada to assess industry sectors including economic output and employment for outdoor recreation, lithium mining, agriculture, and other sectors. Counties enthusiastic.





Meeting Department of the Interior priorities

RMP to implement recent Interior Priorities, encapsulating multiple use with sustained yield per FLPMA goals.

Tentative slogan: *Planning is cool again to tackle the climate crisis....* (nod to Executive Order 14008, 27 Jan. 2021)

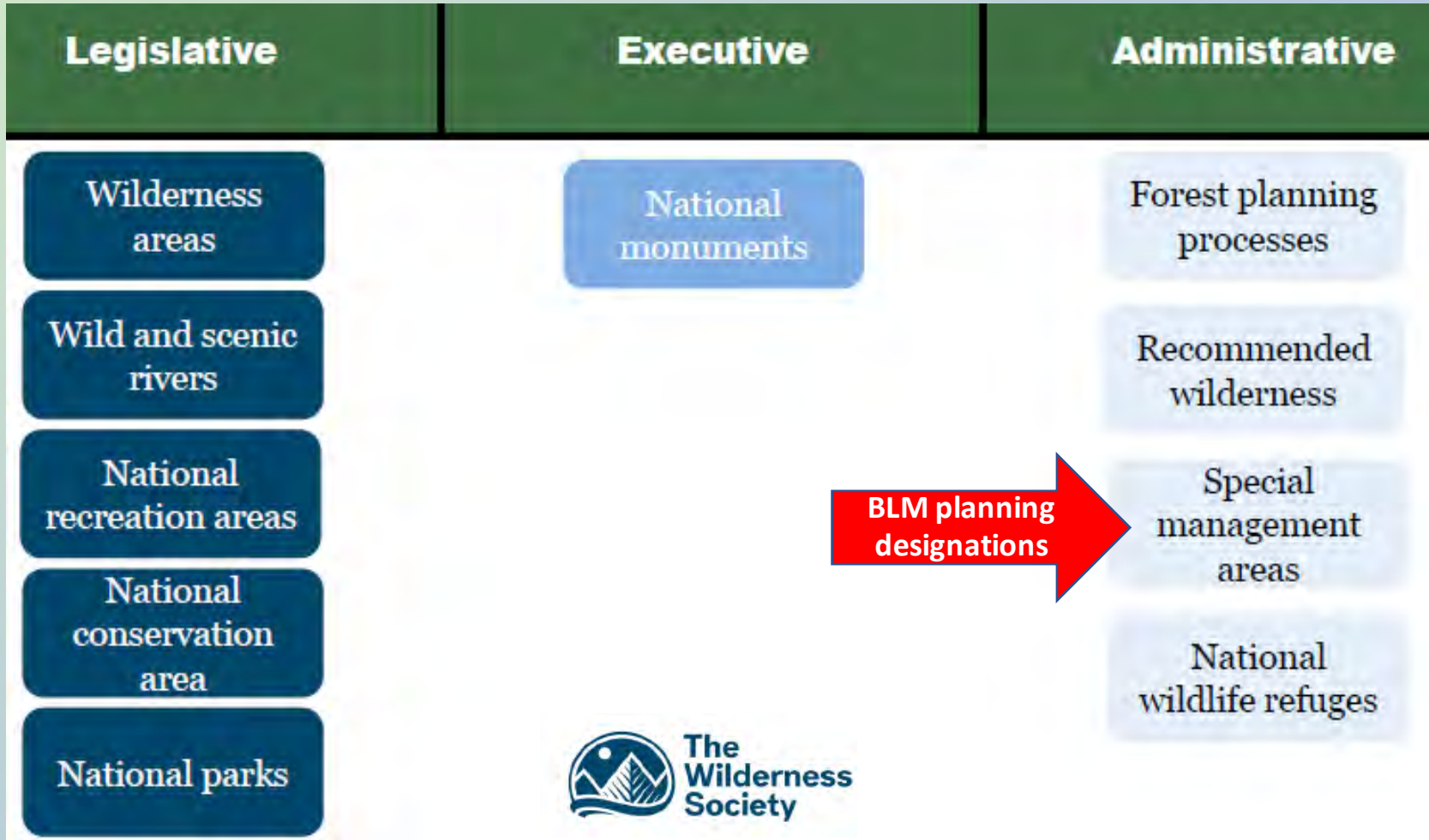
- **Identifying steps to accelerate responsible development of renewable energy on public lands and waters.**
 - No BLM State has more solar applications pending. RMP to feature Designated Leasing Areas (DLAs) and/or Project Development focal areas, new or confirmed transmission corridors, recognition of ongoing projects already initiated.
 - **Energy Act of 2020:** RMP supports national goal of 25 GW additional renewable energy generation nationwide by 2025.
 - Integrate with **State of Nevada initiatives** (e.g., Renewable Portfolio Standard, 2020 State Climate Strategy).
- **Strengthening the government-to-government relationship with sovereign Tribal nations.**
 - Early, targeted outreach for public and tribal engagement through RMP envisioning or pre scoping.
 - Tribes invited to be **Cooperating Agencies** as a supplement to formal Consultation.
 - Requests from Tribes represented within the **RMP range of Alternatives**.
- **Making investments to support the goal of creating millions of family-supporting and union jobs.**
 - Objectives and specific projects, including infrastructure, identified for on-the-ground actions and business opportunities.
 - Projects may be carried out by Climate Conservation Corps, AmeriCorps, non-profits organizations, and/or private firms, especially for activities or actions identified as *Implementation Strategies* a few months after RMP completion.
- **Working to conserve at least 30% each of our lands and waters by the year 2030.** (*America the Beautiful or 30 x 30 Initiative*)
 - **Planning designations** for conservation and climate goals, such as via Areas of Critical Environmental Concern (ACECs), Backcountry Conservation Areas (BCAs), Habitat Conservation Plan (HCP) areas, Wilderness Character (LWC) units, etc.
 - Land use designations, including **mitigation** sites, serve as an **Administrative method for conservation**, thus informing any subsequent, more durable conservation via Executive Action or Federal Legislation. See Wilderness Society example.
- **Centering equity and environmental justice.**
 - Appropriate, close scale to identify **Environmental Justice communities** with latest census and other population data.
 - Targeted outreach conducted, with public meetings brought to EJ communities in rural and urban areas.





One Public Perception of Conservation

- * BLM designations start a spectrum of legal durability for permanent conservation per *30 x 30 Initiative*
- * Designations through NEPA process serve as analysis and public vetting to inform any future actions.

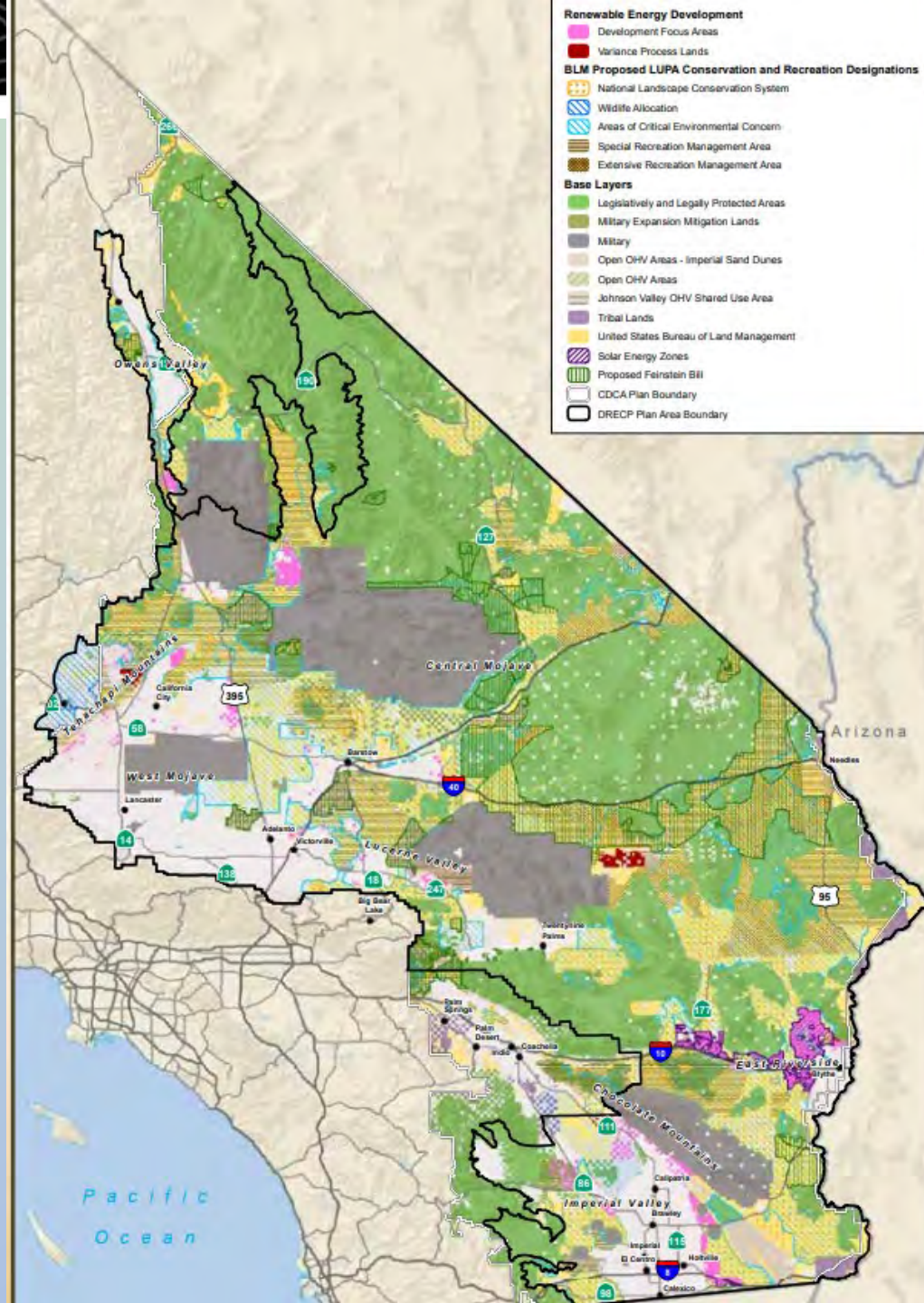




RMP Intentions

- Likely as much or more area would be decided as some kind of land use allocation or designation than as undesignated lands.
- Example: *California Desert Renewable Energy Conservation Plan* (DRECP, 2014-2020). **Not much remains as undesignated (unallocated) land uses**, with substantially more recreation and conservation areas than Renewable Energy Development Focus Areas.
- RMP *durability* and applicability intended as **30+ years** for Nevada.
- True Landscape and Eco-regional Scale.
- Heavy Contractor assistance to prepare it.
- Designations and Allocations would be **selected from the usual planning menu** instead of invented by the specific RMP (e.g., few or no unique classifications if an ACEC, SRMA, RMZ, DLA, **BCA**, etc. serve the intent).

July 2021 preliminary concept



RMP Alternatives

- **Robust Range of Alternatives**, as reasonable, practicable options that still may overlap some elements per Alternative.
- *Hypothetical* themes as examples for likely 4 or maybe 5 Alternatives
 - A. Status Quo (i.e., Planning for the 20th Century)
 - B. Recreation & Public Access theme
 - C. Conservation & Climate theme
 - D. Energy & Industry theme
 - E. Mixed or Blended Land Uses
- Additional *State of Nevada Alternative* could be invited if **sufficiently unique** and provided by the State, as occurred with Greater Sage-Grouse Plan Amendment (2015) and Fallon Naval Air Station EIS (2018).
- Alternative RMP decisions should not be prematurely rejected or pre-decisional if practicable, reasonable, and within the robust range; **all options are good options for the Draft RMP/EIS** (Interior regulations at 43 CFR 46.420(a)).
- Usual suite of BLM issues to be analyzed amongst the Alternatives, plus more focused issues derived from scoping and the influx of solar projects with transmission corridors.
- Any **Supplemental EIS**, because something left out or faulty analysis, would be an **epic fail** of the process.
- **Implementation-level details** should be avoided, with focus instead on broader **planning-level decisions** appropriate for an RMP. Examples: recreation areas, not event participant numbers; travel types, not mapped routes; grazing as available, not animal units; solar generation locations, not mega-Watts; etc.
- Implementation-level or activity plans may be identified as a need in the RMP, but specifics not included.
- **Implementation-level decisions** are identified as such and subject to usual administrative appeal process (IBLA etc.), while **planning-level decisions** are appealed through Federal Courts.





Some Interested Publics

Public Interest should be as Strong as Ever. (Or, *nobody doesn't like a revised RMP.*)

- **Recent Renewable Energy and Climate advocates:** *Smart-from-the-Start consortium* of enviro groups (TNC, Defenders, NRDC, Wilderness Society), promoting the *Power of Place* and industrial solar often on existing disturbed sites in Nevada, such as mining reclamation.
- **Commercial and Industrial stakeholders:** Nevada Mining Association, *Nevada Outdoor Business Coalition*, Cattlemen's Association, Outfitters & Guide Association, and others.
- **Conservation and Wildlife groups:** Pew Trust, *Theodore Roosevelt Conservation Partnership*, Rocky Mountain Elk Foundation, upstart Virgin River Coalition, Friends of Nevada Wilderness, other Friends groups, and many others.
- **Nevada Counties**, especially for disposals, transmission, public access, as assisted by Nev. Association of Counties.
- **State of Nevada**, especially for renewable energy portfolio commitment, Sage-Grouse habitat gains, outdoor recreation, tourism, etc.



- **Resource Advisory Councils** (2 RACs as standing BLM Advisory Groups in Nevada).

Virtual public meetings remain a concern to broadband-impaired rural communities, but virtual meetings also benefit others who participate extensively and often without travel.

Some **in-person meetings** eventually desired for the EIS in late 2021, pandemic permitting.

“Planning is about getting what we want instead of just letting it happen.”



Transmission Corridors as Prominent Issues

Corridors to influence many planning issues

- **Designated Leasing Areas** and Rights of Way.
- Renewable energy projects with **project siting** to minimize resource conflicts.
- *Visual Resource Management* Classes; Dark Sky areas.
- Greater Sage-Grouse and other Wildlife habitat areas.
- Supersede *Western Solar Plan* (2012 Prog. EIS) that designated *Solar Energy Zones* at under-utilized sites.
- Integrate and guide upcoming multi-State RMP Amendments for WEC transmission corridor, solar project sitings, and/or DLAs.

Additional Potential | Cross-Tie or SWIP-N

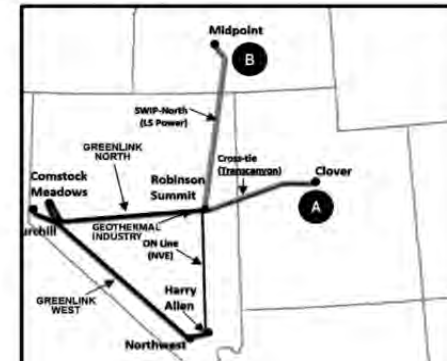
Possible connections to Greenlink North from outside companies complement proposed infrastructure enhancements and could provide additive import potential

Cross-Tie or SWIP-N, out-of-state projects being built by other organizations, would provide an additional 225 MW import capacity

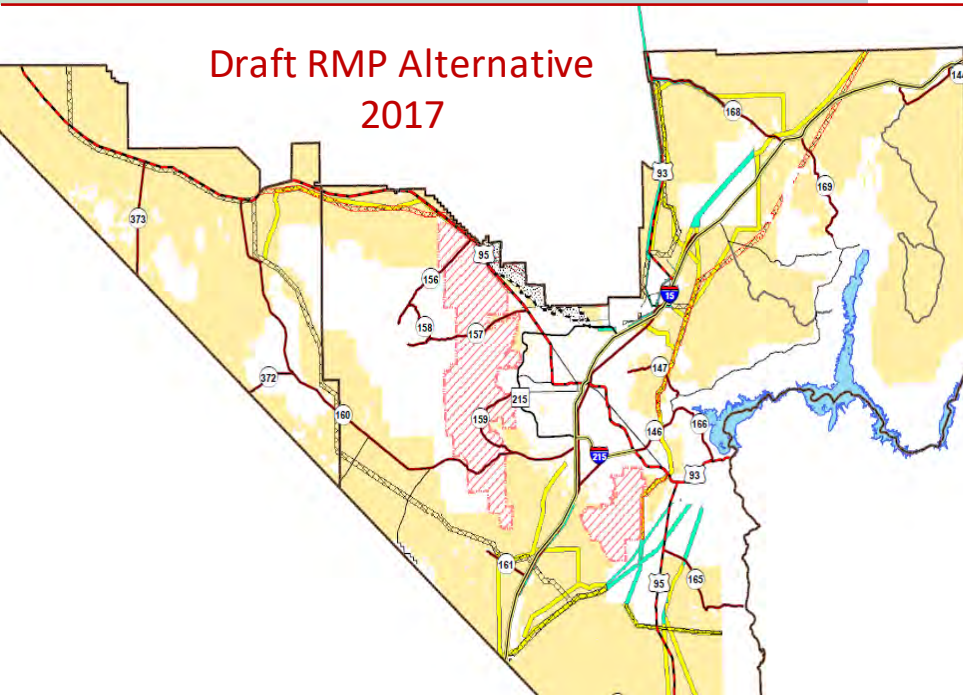
Both projects would provide additive benefits to the proposed infrastructure enhancements, including the ability to import and export renewable energy

A Cross-Tie is a 525 kV line between Utah and Nevada, expected to be in-service late 2024

B SWIP-N is a 525 kV line between Idaho and Nevada



Draft RMP Alternative 2017



Southern Nevada District Office

Las Vegas Field Office - Pahrump Field Office
RMP Revision

Utility Corridor
Alternative - 3
Map 2.6.2.6 - 15

Legend

- SNDO RMP Planning Area
- Lake Mead
- National Monument
- National Conservation Area
- Utility Corridor Alternative 3
- Corridor of Concern
- West Wide Energy Corridor
- Legislative Corridor
- 1998 RMP Designated Corridor
- Land Status
- Bureau of Land Management





Funding Approach & Next Steps

Full RMP/EIS **contractor cost** estimated as **\$6+ million** for all tasks (a typical price range for complex RMPs), including some baseline studies, inventories, and Support Services overhead.

- ✓ **April to August 2021**– **Continue briefings** for BLM Directorate, Headquarters Planning / NEPA Division, local BLM staff, and other interested parties. External meetings in April included Solar Energy Industry, Environmental Conservation Organizations (*Smart-from-the-Start* consortium), and State of Nevada agencies.
- ✓ **July 2021**– Complete draft **Prep Plan** (a plan for the *Plan*), as the internal proposal and budget request, enabling BLM commitment for multiple years of funding (a standard practice prior to 2017).
- ✓ **Sep. to Oct. 2021**– Conduct **Situation Assessment** as RMP envisioning or pre-scoping via targeted interviews with public and non-Federal stakeholders, assisted by third-party neutral facilitator through Interior CADR program.
- ✓ **November 2021**– Complete final Prep Plan as the overall RMP proposal, budget, schedule
- ✓ **Jan. to July 2022**– **Prepare Contracting Solicitation packages** to prepare the RMP/EIS, including pre-plan reports, *Assessment of Management Situation*, and post-plan *Implementation Strategies*.
- ✓ **October 2022**– **Launch funded RMP** (per FY23 PTA budget cycle)
- ✓ **October 2025**– **Approve final RMP Records of Decision**

➤ Questions... Suggestions... Discussion...

“You can always amend a big plan, but you can never expand a little one. I don’t believe in little plans. I believe in plans big enough to meet a situation which we can’t possibly foresee now.” --*Harry S. Truman*





Upcoming RMP *Situation Assessment*

NV-wide Resource Management Plan Status (July 2021)

Situation Assessment (Sep.-Nov. 2021) via BLM-CADR program

- A form of pre-planning and pre-*pre*-scoping to evaluate how best to proceed with a collaborative engagement and what are major planning issues for key non-Federal stakeholders.
- Supported by BLM *Collaborative Action and Dispute Resolution* program (CADR) to secure a third-party neutral practitioner for conducting interviews and preparing a summary report.
- **Interview questions likely to address:**
 - A. awareness of BLM Plans and planning,
 - B. what is good or lacking in current Plans,
 - C. what a Plan Revision should include,
 - D. how best to engage the group or publics,
 - E. kinds of meetings (virtual, in-room, both, urban, rural, etc.),
 - F. other topics....
- **Interviews limited to 9 target groups (per OMB rule), that know BLM planning process and Nevada RMPs, possibly to be:**
 1. Nevada Association of Counties
 2. *Smart-from-the-Start* Energy Consortium
 3. Nevada Outdoor Business Coalition
 4. Theodore Roosevelt Conservation Partnership
 5. Nevada Mining Association
 6. Friends of Nevada Wilderness
 7. Interwest Energy Alliance (www.interwest.org)
 8. Nevada Dept. Conservation and Natural Resource (agency)
 9. Nevada Indian Commission (agency)



Resource Management Plan

(On June 21, 2016, Neil Kornze testified that it takes an average of 8 years to complete an RMP and up to 13 years to complete the process!)

Resource Specific Plans

(optional: depends on significance)

Project Level Plans

Current public land use planning

Sequence

Greater detail;
narrower scope

Excerpts from:

“Rethinking Public Land Use Planning” by Mark Squillace, 2019 article in [Harvard Law Review](#)

The Proposed New Model

1. *At the landscape and RMA scale – focus on “zoning”*
 - The “*what*” not the “*how*”
 - Deciding what uses to allow and which to prohibit
 - EIS process focused strictly on alternative visions (maps)
2. Set *eco-health goals* for each zone *and identify specific, objective metrics to allow the BLM to ascertain whether goals are being met*
3. Monitor for the metrics
4. If goals not met, *adapt*

Consequences of the Long Timeline

If it takes 8-13 years to fully complete the planning process then public engagement is compromised

- The agency people who worked on the plan, the people who engaged the agency on the plan, and even the conditions on the ground are likely to change over that period of time
- **Few would have the time, patience, and wherewithal to be involved over that whole 8-13 year period**

More importantly, adaptive management becomes unrealistic

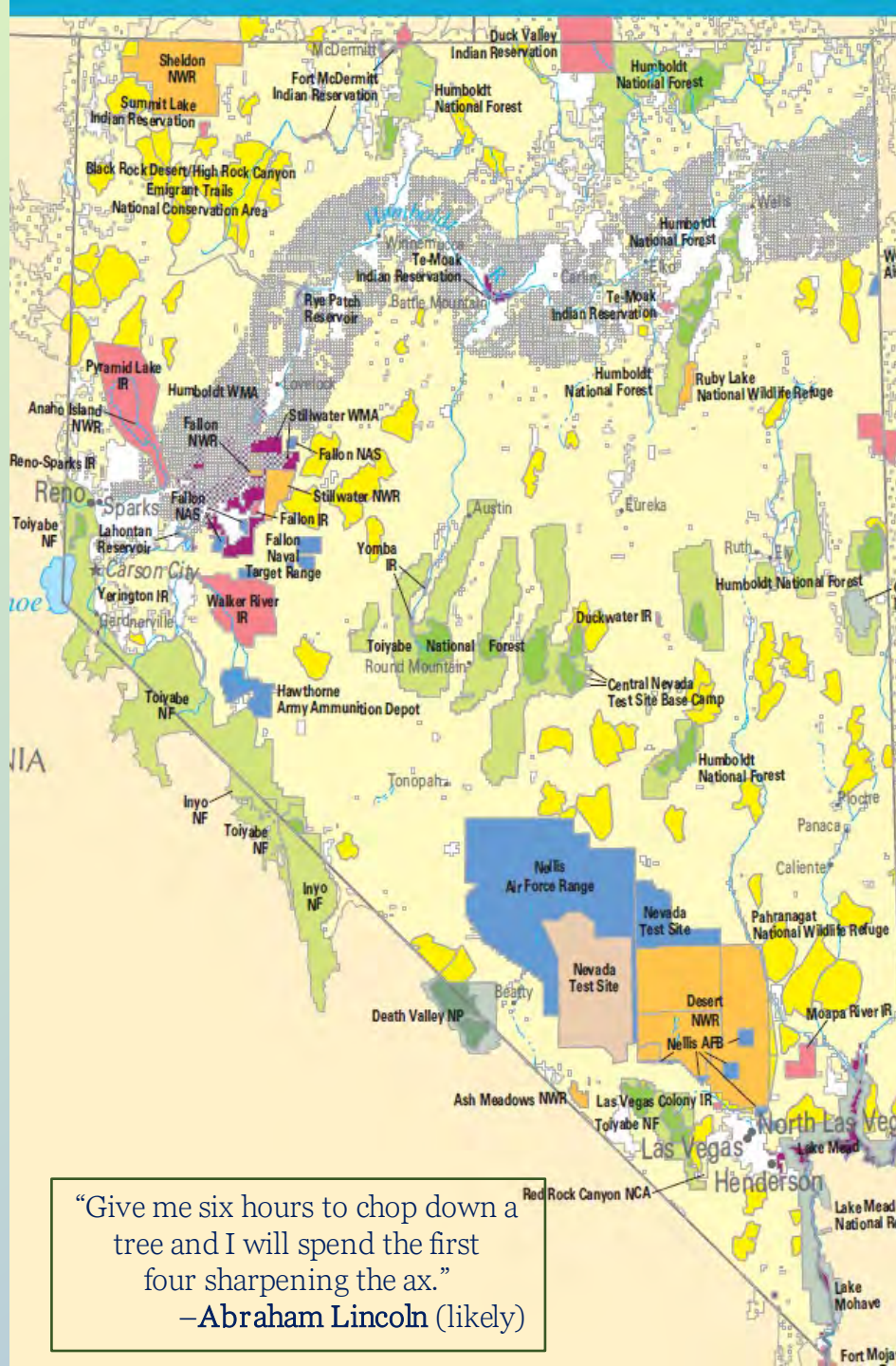
Current Public Land Use Planning

Excerpts from:

“Rethinking Public Land Use Planning” by Mark Squillace, 2019 article in [Harvard Law Review](#)

My thesis: The planning process is badly broken

- **It is unnecessarily complex**
- **RMPs/LRMPs take too long to complete**
- **It monopolizes the time and resources of public land management agency staffs**
- **It fails to meaningfully engage the general public**
- **It is not sufficiently nimble to respond to changing conditions, a problem exacerbated by climate change.**



Alternative Maps



“Give me six hours to chop down a tree and I will spend the first four sharpening the ax.”
 –Abraham Lincoln (likely)

Department of the Interior priorities

details at www.doi.gov/ourpriorities

To meet the scope of our challenges and the multiple, overlapping crises, we are:

- **Identifying steps to accelerate responsible development of renewable energy on public lands and waters.** We are investing in climate research and environmental innovation to incentivize the rapid deployment of clean energy solutions, while reviewing existing programs to restore balance on America's public lands and waters to benefit current and future generations.
- **Strengthening the government-to-government relationship with sovereign Tribal nations.** We understand that tribal sovereignty and self-governance, as well as honoring the federal trust responsibility to Tribal Nations, must be the cornerstones of federal Indian policy.
- **Making investments to support the Administration's goal of creating millions of family-supporting and union jobs.** This includes establishing a new Climate Conservation Corps Initiative to put a new generation of Americans to work conserving and restoring public lands and waters, increasing reforestation, increasing carbon sequestration in the agricultural sector, protecting biodiversity, improving access to recreation, and addressing the changing climate.
- **Working to conserve at least 30% each of our lands and waters by the year 2030.** We will work to protect biodiversity, slow extinction rates and help leverage natural climate solutions by conserving 30% of America's lands and waters by 2030. This relies on support for local, state, private, and tribally-led nature conservation and restoration efforts that are underway across America.
- **Centering equity and environmental justice.** The impacts of the multiple crises in the United States are not evenly distributed in our society. Communities of color, low-income families, and rural and indigenous communities have long suffered disproportionate and cumulative harm from air pollution, water pollution, and toxic sites. At every step of the way, Interior will engage diverse stakeholders across the country, as well as conduct formal consultation with Tribes in recognition of the U.S. government's trust responsibilities.



Some References

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- BLM Planning and Management overview: <https://nespguidebook.com/ecosystem-services-and-federal-agencies/bureau-of-land-management/>
- BLM Nevada RMPs (current and Drafts): <https://www.blm.gov/programs/planning-and-nepa/plans-in-development/nevada>
- Western Oregon RMPs: <https://eplanning.blm.gov/eplanning-ui/project/57902/510>
- California Desert Renewable Energy Conservation Plan/RMP: <https://eplanning.blm.gov/eplanning-ui/project/66459/510>