



— BUREAU OF —
RECLAMATION

InterConnect Towers Project Lake Las Vegas

**Final Environmental Assessment and
Finding of No Significant Impact/Decision Record
LC-26-07
Lower Colorado Basin**

Mission Statements

The U.S. Department of the Interior protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, Native Hawaiians, and affiliated Island Communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

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Finding of No Significant Impact (FONSI)

and

Decision Record

LC-26-07

for

**Final Environmental Assessment (EA) for
InterConnect Towers Project Lake Las Vegas**

Henderson, Nevada

Based on a thorough analysis of the potential environmental impacts presented in the EA, the Bureau of Reclamation (Reclamation) finds that implementation of the Proposed Action will not significantly affect the quality of the human environment within or adjacent to the project area, therefore an Environmental Impact Statement will not be prepared.

Accordingly, this FONSI is submitted to document environmental review and evaluation of the Proposed Action Alternative in compliance with the National Environmental Policy Act (NEPA) of 1969, as amended.

Reclamation certifies that it has considered the requirements of NEPA and 516 Department Manual 1 – Department of the Interior Handbook of National Environmental Policy Act Implementing Procedures, all relevant information raised in the NEPA process, and that the NEPA process has concluded. Given this information, Reclamation has made the decision to implement the proposed action described in Chapter 2 of the final EA.

Prepared: _____

NEPA Coordinator

Recommended: _____

Manager, Environmental Compliance Group

Approved: _____

Chief, Resource Management Office

BACKGROUND

Reclamation prepared an EA for the construction of a new Wireless Broadband telecommunications facility located east of East Lake Mead Parkway and Lorin C Williams Parkway in Henderson, Clark County, Nevada.

This EA was prepared to analyze and disclose the environmental effects of the Proposed Action, which consists of the construction of a new 70' x 70' licensed site, with a 198' total height telecommunications tower, associated equipment, fiber, and NV Energy power and access easements. InterConnect Towers, LLC (ICT) has applied for Bureau of Reclamation (Reclamation) approval of the proposed project. This EA was prepared to assist Reclamation's Lower Colorado Basin Regional Office in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in making a determination of impacts/effects from the result of the analyzed actions. This EA describes the findings of the potential impacts of a No Action Alternative and the Proposed Action Alternative.

ALTERNATIVES CONSIDERED

A No Action Alternative and a Proposed Action Alternative were considered in detail. Under the No Action Alternative, a new tower would not be constructed, and land use at the site would remain the same as current conditions, pending potential future development.

The Proposed Action

Under the Proposed Action Alternative, a new tower would be constructed, following the recommended mitigation measures, and additional wireless service coverage would be provided to the area and surrounding vicinity.

The Proposed Action includes a new 70' x 70' licensed site, 198' total height telecommunications tower, associated equipment and fiber and grid power and access easements. Approximately 0.72 acres of undeveloped desert land would be disturbed during the construction of the licensed site and utility access. No temporary staging area is needed or requested. A single 198' (196' with a 2' lightning rod) lattice tower mounted on a 24' circular base on concrete caissons (198' total height) would be installed within the new licensed area. Additional proposed features would include:

- Two 20' x 20' shelter buildings capable of housing four tenants
- Four 500-gallon propane tanks
- Four 35kW generators
- Two entrance gates at compound and on access road entrance
- +/- 90.26' by 14' access easement
- +/- 814' by 30' wide utility easement
- 7' closed loop 1.5" chain link or 8' Decorative Block Wall fencing with an additional 1' barbed wire or angle iron on top

ENVIRONMENTAL COMMITMENTS

The following measures would be implemented as part of the Proposed Action to reduce or eliminate impacts to resources:

Biological Resources

Minimization Measures

Desert Tortoise: All minimization measures in informal consultation 2024-0131912-S7-001 would be implemented as appropriate.

Nesting Birds: Project activities that may affect vegetation will occur outside of the migratory bird breeding season (February 15 to August 31) to the maximum extent practicable. If construction and maintenance activities cannot occur outside February 15 to August 31, a biologist, approved by Reclamation, will conduct nesting bird clearance surveys. If any nesting bird activity is detected, all activities will cease until the biologist determines that no active nests, eggs, nestlings or recently fledged birds will be affected.

Noxious and Invasive Weeds: Equipment used for this project shall be thoroughly cleaned prior to entering and exiting the project site. The cleaning process would ensure that all dirt and debris that may harbor noxious or invasive weeds and seeds are removed and disposed of at an appropriate facility. Reclamation's Inspection and Cleaning Manual for Equipment and Vehicles to Prevent the Spread of Invasive Species: 2021 Edition should be referenced for inspection and cleaning activities. The manual can be found at:

<https://www.usbr.gov/lc/region/g2000/envdocs/EquipmentInspectionandCleaningManual2021.pdf>

Air Quality: A water truck would remain on-site to keep dust down.

Water Resources: There is a desert wash to the north of the licensed area. The USFWS Wetland Classification code is R4SBC. No impacts are expected to this feature from the proposed project; prudent avoidance measures are warranted, and the project would employ Best Management Practices, where applicable, as described in Nevada Division of Environmental Protection guidelines that can be found at:

https://ndep.nv.gov/uploads/water-bmp-docs/Construction_and_Grading.pdf

COORDINATION AND CONSULTATION

Consultation with Reclamation's consulting parties, in accordance with 54 U.S.C. § 306108, commonly referred to as Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 CFR § 800, was concluded on December 8, 2025. Reclamation has determined that the proposed undertaking would likely have no adverse effect on historic properties. Reclamation has notified all consulting parties, has provided those parties with the appropriate documentation, has afforded those parties approximately 60 calendar days from their receipt to review the finding, and has received no objections to its finding. The Advisory Council on Historic Preservation, finally, is not reviewing the finding. Accordingly, Reclamation's obligations under Section 106 have been fulfilled. Reclamation shall carry out the undertaking in accordance with 36 CFR § 800.5(d)(1) and 36 CFR § 800.5(c)(1).

Informal consultation was initiated with the U.S. Fish and Wildlife Service on August 15, 2024. Based on surveys conducted in the project area and proposed minimization measures, Reclamation determined that the proposed project may affect, but is not likely to adversely affect, the Mojave Desert Tortoise. The service concurred with this determination on August 23, 2024.

1.0 Introduction

This Environmental Assessment (EA) was prepared in compliance with the National Environmental Policy Act (NEPA) and 516 Department Manual 1 – Department of the Interior Handbook of National Environmental Policy Act Implementing Procedures. The purpose of this EA is to evaluate the potential impacts of the proposed project on the physical and human environment and determine if the impacts would be significant, thus warranting the preparation of an Environmental Impact Statement.

The InterConnect Towers, LLC (ICT or Applicant) is proposing to construct a new 70' x 70' licensed site, 198' (196' lattice tower with a 2' lightning rod) telecommunications tower, associated equipment, and fiber and access easements east of East Lake Mead Parkway and Lorin C Williams Parkway in Henderson, Clark County, Nevada.

1.1 Purpose and Need

The purpose of the Proposed Action is to 1) provide Wireless Broadband signal coverage, and 2) strengthen/densify coverage and provide line-of-site 4G and 5G digital coverage along the new coverage area, specifically near East Lake Mead Parkway and Lorin C Williams Parkway. The project site has been indicated to ICT by Verizon as a 4-year high-priority site. More importantly, Emergency Response and Law Enforcement Agencies that are charged with managing and responding to the needs of the public in this area of dense suburban development in Clark County would benefit.

2.0 Description of Alternatives

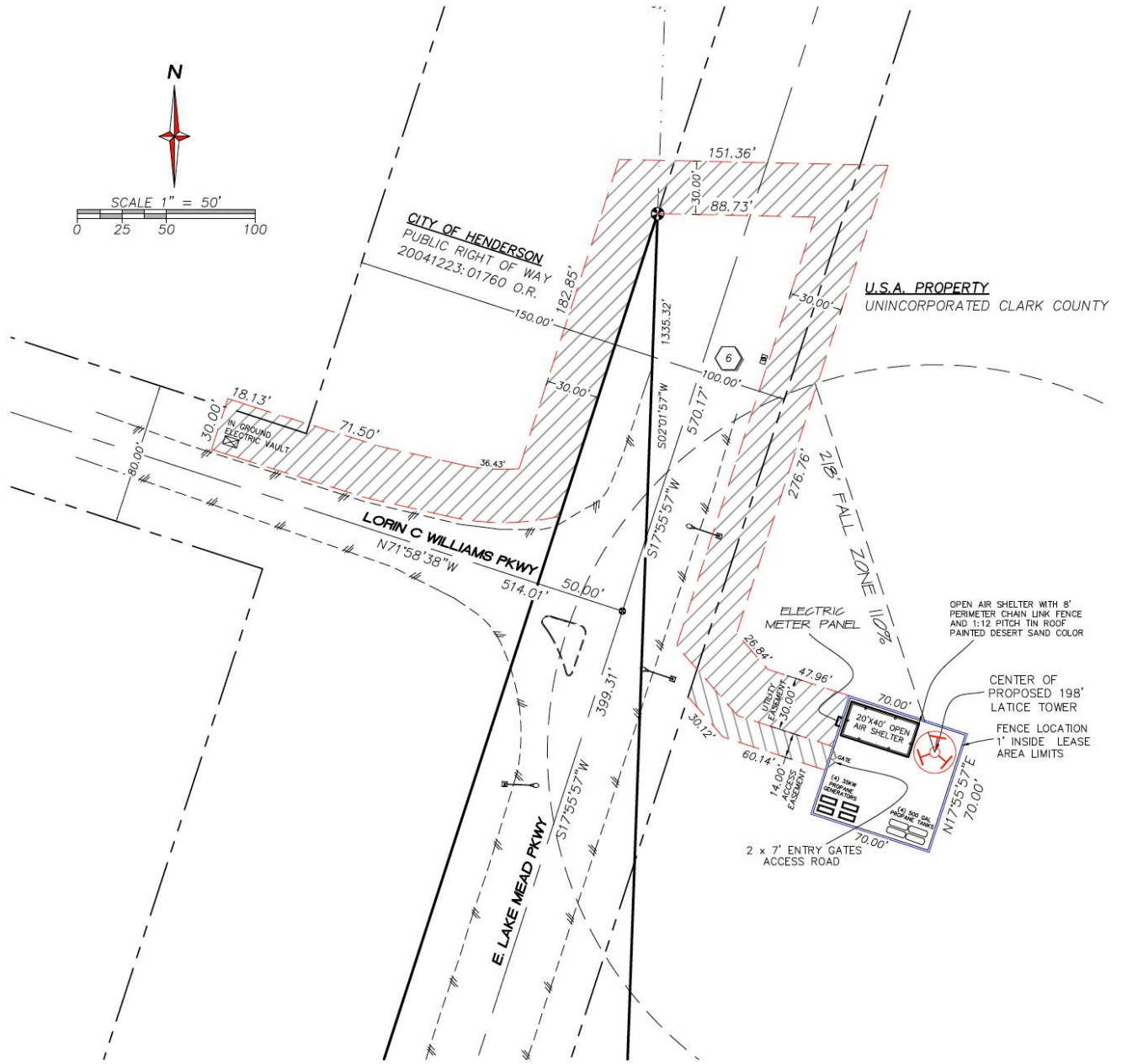
2.1 No Action Alternative

Under the No Action Alternative, a new tower would not be constructed, and the site would remain in its current condition, pending potential future development.

2.2 Proposed Action Alternative

Under the Proposed Action Alternative, a new 70' x 70' licensed site would be developed with a 198' telecommunications tower, associated equipment, and fiber and access easements. Approximately 0.72 acres of undeveloped desert land would be disturbed during the construction of the licensed site and utility access. No temporary staging area is needed or requested. A single 198' (196' with a 2' lightning rod) lattice tower mounted on a 24' circular base on concrete caissons would be installed within the new licensed area. Additional proposed features would include:

- Two 20' x 20' shelter buildings capable of housing four tenants
- Four 500-gallon propane tanks
- Four 35kW generators
- Two entrance gates at compound and on access road entrance
- +/- 90.26' by 14' access easement
- +/- 814' by 30' wide utility easement
- 7' closed loop 1.5" chain link or 8' Decorative Block Wall fencing with an additional 1' barbed wire or angle iron on top



LEGEND

	CELLULAR TOWER
	CELLULAR COMPOUND WALL
	EDGE OF ASPHALT
	STREET CENTERLINE
	RIGHT-OF-WAY
	SECTION LINE
	EASEMENT LINE
	ACCESS ROAD EASEMENT
	POWER LINE EASEMENT

6 DEED FOR PUBLIC HIGHWAY RECORD
JUNE 18, 1942 IN BOOK 30 OF DEEDS,
PAGES 496-7, CLARK COUNTY,
NEVADA RECORDS AS DOCUMENT NO.
143036

Figure 1 Site Plan

Construction is expected to begin within 3 months of Grant and Notice to Proceed (NTP) issuance. All disturbances would be within the boundary of the right-of-way (ROW). Design factors include wind loads and suitability of soils and geology reports for placement of the facility foundation, equipment shelter, tower, and generators.

The project site along with the proposed 198' lattice tower would meet the 2013 US Fish & Wildlife Service (USFWS) Revised Voluntary Guidelines for Communications Tower Design, Siting, Construction, Operation, Retrofitting, and Decommissioning recommendations and would be in full conformance with the Motorola R56 Standards and Guidelines for Communication Sites, an industry-standard manual for the design, construction, and installation of communication facilities. The tower and tower foundation would be engineered by a tower manufacturer to the most current Telecommunication Industry Association (TIA) standards and codes at the time of design to include, but not limited to, soil conditions, wind loads, and seismic zones. Proper signage would be installed on the tower identifying and displaying radio frequency, licensing, climbing requirements, and Federal Communications Commission (FCC) information.

The technical signal coverage data information sheet(s) for each carrier is different. ICT would not be installing any equipment on the tower. ICT would own all deployed enclosed equipment shelter buildings, and the carriers would deploy their own equipment inside ICT's shelter.

The proposed permanent site is a 70' x 70' licensed area and would be identified and marked by the surveyor. No additional space, except the access road and utility easements outside of ROW area, is needed. Carriers would visit the site once per month for two to three hours at a time to provide any required maintenance. The only routine maintenance anticipated is light road maintenance, which would be performed by ICT for the benefit of their tenants.

The proposed ICT dirt access road begins at East Lake Mead Parkway and runs southeast approximately 90' to the access gate and the fenced licensed site. The proposed NV Energy (NVE) utility access/easement would run from the licensed area northwest approximately 90' to Lake Mead Parkway, north along the east side of Lake Mead Parkway approximately 277', across Lake Mead Boulevard to the west approximately 151', then south 183' and west approximately 36'. The proposed trench within the NVE easement would be approximately 1.5' wide and 40" deep.

The project site is compatible with all other wireless users. All tenants would be FCC licensed to operate on specific frequencies and channels exclusive to their user to prevent interference from occurring. This also minimizes the potential for conflicts with other communication modes (i.e., mixing high power continuous with low power intermittent operations, obstructions between microwave towers, etc.).

No helicopter would be required for the construction of the project site, and no temporary access would be required. The high security chain link fence is Motorola R-56 Compliant.

Prior to construction commencing, the flagging and staking of the project site would be completed by a State of Nevada licensed land surveyor. The tower site area would be marked with an appropriate stake or pin as determined by Reclamation. The project site access road would also be marked with appropriate markings as determined by Reclamation.

Access would be restricted to the construction site during construction. Either prior to or after construction is completed, a restricting gate would be installed at the entrance of the tower site compound.

The proposed licensed area is located within undisturbed desert land, predominantly comprised of Mojave creosote bush scrub, white bursage, and brittlebush. The vegetative community in the project footprint is comprised entirely of Mojave creosote bush scrub, with dominant shrubs including creosote bush (*Larrea tridentata*), white bursage (*Ambrosia dumosa*), and brittlebush (*Encelia farinosa*). Other plants in the area include scattered hedgehog cactus (*Echinocereus engelmannii*), beavertail (*Opuntia basilaris*), and globe mallow (*Sphaeralcea ambigua*). The understory hosts herbaceous annuals including desert fluff grass (*Dasyochloa pulchella*), scorpion flower (*Phacelia cf. crenulata*), and trailing windmills (*Allionia incarnata*). This community is described as located in well-drained sandy and sandy-loam soils, often on bajadas and low hills and is characterized by widely spaced shrubs and bushes 2 to 8 feet tall.

Areas outside of the compound and access/utility easement would not be disturbed. Site grading would be required for construction. Soils disturbed within the compound would remain within the compound. The tower site would be graded using earthmoving equipment such as a bulldozer, and then the excavation for the tower foundation would proceed.

Small foundations for the shelter/building pad would be excavated. Rebar for the foundation footings would be installed and the anchor bolts for the tower mounts would be placed. The concrete foundation would be poured in a single day for both the tower and building/pad. Fencing would be constructed either prior to or upon finalizing the site construction, either before or simultaneously with carrier equipment deployment.

All industry safety requirements would be strictly adhered to. No industrial waste or toxic substances would be generated or created during the construction process. Common hazardous substances including fuel, coolants, lubricants, and batteries would be used in the construction or be transported in the right-of-way. Pesticides are not anticipated to be needed or utilized. Restoration of temporarily disturbed areas (e.g. inadvertent impacts from equipment storage or delivery, trampling by workers, etc.) would occur upon completion of the project construction if it appears that the vegetation would not be able to regenerate without intervention.

2.2.1 Minimization Measures

The following measures would be implemented as part of the Proposed Action to reduce or eliminate impacts to resources:

Biological Resources

Nesting Birds. Project activities that may affect vegetation will occur outside of the migratory bird breeding season (February 15 to August 31) to the maximum extent practicable. If construction and maintenance activities cannot occur outside February 15 to August 31, a biologist, approved by Reclamation, will conduct nesting bird clearance surveys. If any nesting bird activity is detected, all activities will cease until the biologist determines that no active nests, eggs, nestlings, or recently fledged birds will be affected.

Tortoise 1. A maximum speed limit of 15 miles per hour shall be required for all vehicles on the project site and dirt access roads.

Tortoise 2. No more than 30 days prior to the start of any ground disturbing activities, including grubbing, grading, staging, or deliveries, a follow-up survey for new desert tortoise sign (burrows, scat, tracks, etc.) would be performed by a qualified biologist. In the unlikely event that the site or area within 500 feet has become occupied by tortoise, the following additional measures shall be employed during construction activities:

- A qualified tortoise biologist shall present a tortoise-education program to all employees working on the project. The program would include information on the life history of the desert tortoise, legal protection, penalties for violations of Federal and State laws, general tortoise activity patterns, reporting requirements, and measures to protect tortoises. The definition of "take" would also be explained.
- All workers would also be instructed to check underneath all vehicles before moving such vehicles. Tortoises often take cover under vehicles.
- All personnel would be instructed that in the unlikely event a tortoise is found onsite during project activities which may result in take of the tortoise (e.g., in harm's way), such activities shall cease until the tortoise moves out of the area on its own accord. If the tortoise does not move out of the area; the Reclamation biologist would be contacted for assistance at (702) 293-8085.
- If any active or suspected burrows are found within 500 feet of the project site, a qualified biologist would be on site during the project and temporary tortoise proof fencing would be installed around the work area. Additional avoidance measures may be recommended in the preconstruction survey results report.

Tortoise 3. Measures shall be taken to minimize predation on tortoises by ravens drawn to the project area. This would involve a litter-control program. This program would include the use of covered, raven-proof trash receptacles, removal of trash from the construction site to the trash

receptacles following the close of each work day, and proper disposal of trash in a designated solid waste disposal facility. Vehicles hauling trash to the landfill and leaving the landfill must be secured to prevent litter from blowing out along the road.

Tortoise 4. Measures shall be taken to minimize destruction of desert tortoise habitat, such as soil compaction, erosion, or crushed vegetation, due to project-related activities:

- If possible, overnight parking and storage of equipment and materials, including stockpiling, shall be within previously disturbed areas or areas to be disturbed which have been cleared by a tortoise biologist.
- All vehicle traffic would be restricted to existing access roads or utility road easement once the new access road has been created.
- Project activity areas would be clearly marked or flagged at the outer boundaries before the onset of construction. All activities shall be confined to designated areas. Blading of vegetation would occur only to the extent necessary and shall be limited to areas designated for that purpose by Reclamation or their designated biologist.

In addition to the aforementioned avoidance measures, Reclamation requires the following avoidance and minimization measures on projects within desert habitats:

- A biological monitor shall be present during all ground disturbing construction and maintenance activities. Only biologists approved by Reclamation shall conduct preconstruction surveys or serve as biological monitors. The project proponent shall submit the name(s) and resumes of proposed biologist(s) to Reclamation for review and written approval at least 15 days prior to the onset of activities. No activities shall begin until a biologist is approved by Reclamation and is present at the worksite.
- To prevent the spread of noxious and invasive weeds, equipment used for this project shall be thoroughly cleaned prior to entering and exiting the project site. The cleaning process would ensure that all dirt and debris that may harbor noxious or invasive weeds and seeds are removed and disposed of at an appropriate facility. Reclamation's *Inspection and Cleaning Manual for Equipment and Vehicles to Prevent the Spread of Invasive Species: 2021 Edition* should be referenced for inspection and cleaning activities. The manual can be found at: <https://www.usbr.gov/lc/region/g2000/envdocs/EquipmentInspectionandCleaningManual2021.pdf>.
- All potential pitfalls to wildlife including test pits would be covered, fenced, or backfilled when not attended.
- No dogs are allowed on the project site.
- If biological issues or questions arise prior to or during project implementation contact Reclamation's Biological Services Coordinator at 702-293-8085.
- The U.S. Fish and Wildlife Service, Southern Nevada Fish and Wildlife Office (702-515-5230) would be notified of any desert tortoise death or injury due to the project implementation by close of business on the following day.

As part of project, the Applicant would be responsible for ensuring that any Reclamation holes or other openings in the ground are backfilled and properly covered, according to the Nevada Regulatory Statutes.

The Applicant shall remove from public land and properly dispose of any and all trash, litter, debris, waste, excess materials, including flagging and signs, or other substances and materials resulting from the use under this authorization. All trash and food items shall be promptly contained within closed, raven-proof containers.

Paleontological Resources

The Applicant shall immediately notify Reclamation of any paleontological resources discovered as a result of operations under this authorization. The Applicant shall follow up with a written report of their finding(s) to Reclamation within forty-eight (48) hours. The Applicant shall suspend all activities in the vicinity of such discovery until notified to proceed by Reclamation and shall protect the discovery from damage or looting. The Applicant may not be required to suspend all operations if activities can be adjusted to avoid further impacts to a discovered locality or be continued elsewhere. Reclamation would evaluate such discoveries as soon as possible, but not later than ten (10) working days after being notified. Appropriate measures to mitigate adverse impacts to paleontological resources would be determined by Reclamation after consulting with the Applicant. Within ten (10) days, the Applicant would be allowed to continue construction through the site or would be given the choice of either (1) following the Authorized Officer's instructions for stabilizing the paleontological resource in place and avoiding further disturbance to the paleontological resource, or (2) following the Authorized Officer's instructions for mitigating impacts to the paleontological resource prior to continuing construction through the project area.

Cultural Resources

If there are unanticipated effects on historic properties or if any cultural resources (historic or prehistoric sites or objects) are discovered by the Applicant, or any person working on the Applicant's behalf, on public or federal lands, Reclamation shall be immediately notified. The Applicant shall immediately suspend all operations within 300 feet of the discovery or affected historic property, and Reclamation would proceed in accordance with 36 CFR § 800.13(b)(3). The Applicant shall follow up with a written report of their finding(s) to Reclamation within forty-eight (48) hours. The area would be protected and secured until written authorization to proceed is issued by Reclamation. The Applicant would make every effort to protect the site from further impacts, including looting, erosion, or other human or natural damage. In some cases, this may delay activity at the site until the discovery may be recovered, or the project is modified to avoid impacting the find.

Should human remains, skeletal elements suspected of being human, and/or possible graves be observed by the Applicant, or any person working on Reclamation's behalf, on public or federal lands, Reclamation shall immediately be notified. The Applicant shall immediately suspend all

operations within 300 feet of the discovery, and the discovery would be protected and secured. The Applicant shall follow up with a written report of their finding(s) to Reclamation within forty-eight (48) hours. The Applicant would make every effort to protect the site from further impacts, including looting, erosion, or other human or natural damage. The provisions of all relevant state laws, where appropriate, would be followed. If they are determined to be Native American remains or burials, Reclamation, where applicable, would notify the relevant parties as soon as possible in compliance with the requirements outlined in the Native American Graves Protection and Repatriation Act, 25 U.S.C. 3001 et seq., and conduct consultations in accordance with the Federal regulations in 43 Code Federal Regulations Part 10. Any decision regarding suitable mitigation measures would be made by Reclamation after coordinating with the Applicant and consulting with the appropriate parties. The Applicant would be responsible for the cost of evaluation and the resultant mitigation.

Hazardous Materials

If hazardous materials/substances are used or present within the authorized area, the Applicant shall immediately notify Reclamation of any release (leaks, spills, etc.) of hazardous substances, toxic substances, or hazardous waste. As required by law, Applicant shall have responsibility for and shall take all action(s) necessary to respond to and fully remediate releases (leaks, spills, etc.) within the authorized area. A copy of any report required or requested by any federal, state, or local government agency as a result of a reportable release or spill of any hazardous substances shall be furnished to Reclamation concurrent with the filing of the reports to the involved federal, state, or local government agency.

Survey Monuments

Applicant shall protect all survey monuments found within the authorization area. Survey monuments include, but are not limited to, General Land Office and Reclamation Cadastral Survey Corners, reference corners, witness points, U.S. Coast and Geodetic Survey benchmarks and triangulation stations, military control monuments, and recognizable civil (both public and private) survey monuments. If any of the above are to be disturbed during operations, the Applicant shall secure the services of a Professional Land Surveyor or Reclamation cadastral surveyor to perpetuate the disturbed monuments and references using surveying procedures found in the Manual of Instructions for the Survey of the Public Lands of the United States and Nevada Revised Statutes, Chapter 329, Perpetuation of Corners. The Applicant shall record such survey in the appropriate county and send a copy to Reclamation. If Reclamation cadastral surveyors or other federal surveyors are used to restore the disturbed survey monuments, the Applicant shall be responsible for the survey cost.

Recreation

Unless expressly stated, a land use authorization does not create an exclusive right of use of an area by the Applicant. The Applicant shall not interfere with other valid uses of the federal land by other users, such as casual recreationists.

Hydrology

All generators would comply with all regulations set forth by the Nevada Division of Environmental Protection (NDEP). During construction there would be porta-potties maintained daily with other on-site refuse also being removed daily.

All generators installed by the ICT or tenants would comply with all regulations set forth by the Clark County Air Quality Management. All safety standards would be strictly observed.

All soil stability and erosion control methods and applications would be engineered by a licensed engineer. A geotechnical study/report would be obtained prior to construction commencing.

Air Quality

A water truck would remain on-site to keep dust down.

Water Resources

There is a desert wash to the north of the licensed area. No direct impacts are expected to this feature from the proposed project; however due to the proximity of soil disturbance to the feature, prudent avoidance measures are warranted, and the project would employ Best Management Practices, where applicable, as described in NDEP guidelines that can be found here: https://ndep.nv.gov/uploads/water-bmp-docs/Construction_and_Grading.pdf.

3.0 Affected Environment and Environmental Consequences

The following section presents a description of the existing condition for the selected resource areas being reviewed as well as an analysis of the effects of the Proposed Action on those resources.

3.1 Resources Not Discussed in Detail

The following resources were considered and are either considered under other resource sections or not further addressed in this document because they would not be impacted by the Proposed Action

- Air Quality
- Socioeconomics
- Floodplains
- Geology/Mineral Resources
- Hydrologic Conditions
- Native American/Tribal Concerns
- Cultural Resources/Traditional Cultural Properties
- Recreation/Travel/Wild and Scenic Rivers
- Soils
- Wastes (Hazardous or Solid)
- Water Resources
- Wetlands and Riparian Areas
- Wilderness/Wilderness Study Areas/Lands with Wilderness Characteristics

3.2 Resources Discussed in Detail

The following resource areas are discussed below.

- Vegetation
- Fish and Wildlife Excluding Federally Listed Species
- Invasive Species/Noxious Weeds
- Migratory Birds
- Threatened, Endangered, or Candidate Animal Species
- Visual Resources

3.3 Vegetation

3.3.1 Affected Environment

There is a single habitat type found within the Study Area which includes the project site/footprint, as well as a 500-foot buffer around the footprint. Descriptions follow the Nevada Natural Heritage Program's Vegetation Classifications (Peterson 2008).

The vegetative community in the project footprint is comprised entirely of *Larrea tridentata* Shrubland Alliance (Mojave creosote bush scrub), with dominant shrubs including creosote bush (*Larrea tridentata*), white bursage (*Ambrosia dumosa*), and brittlebush (*Encelia farinosa*). Other plants in the area include hedgehog cactus (*Echinocereus engelmannii*), beavertail (*Opuntia basilaris*), and globe mallow (*Sphaeralcea ambigua*). The understory hosts herbaceous annuals including desert fluff grass (*Dasyochloa pulchella*), scorpion flower (*Phacelia cf. crenulata*), and trailing windmills (*Allionia incarnata*). This community is described as located in well-drained sandy and sandy-loam soils, often on bajadas and low hills and is characterized by widely spaced shrubs and bushes 2 to 8 feet tall.

To the south and southeast, in the buffer, is a rocky hill with rock outcrops and areas with shallow soils (Sunrock-Haleburu-Rock outcrop Association, with higher percentage of rock outcrops). The vegetation in this area is sparser and dominated by sweetbush (*Bebbia juncea aspera*), brittlebush (*Encelia farinosa*), and blackbrush (*Coleogyne ramosissima*). There may also be Fremont's dalea (*Psoralea fremontii*) and/or Parish's goldeneye (*Bahiopsis parishii*) present as well; however, during the survey the leafless shrubs were unidentifiable.

There is a sandy wash just to the northeast of the proposed licensed site. The wash does not host any different habitat.

3.3.2 Environmental Consequences

3.3.2.1 No Action Alternative

Under the No Action Alternative surface disturbance would not take place, and there would be no additional impacts to the vegetation in the project area.

3.3.2.2 Proposed Action Alternative

The construction of the tower/licensed site and access and utility road would result in the permanent loss of 0.72 acres of Mojave Desert Scrub habitat.

3.3.2.3 Long Term Effects

Although there is risk of creating conditions favorable to invasive plants as a result of the proposed project, these risks would be minimized through measures that avoid unnecessary impacts to areas outside the footprint that also apply to sensitive species. This specific project, although relatively small, is contributing to permanent vegetation loss in this region. This area has already experienced impacts from habitat loss and fragmentation of habitat due to the nearby suburban expansion and other road and powerline development and the area shows evidence of some infestation of non-native species. The avoidance measures which will minimize impacts to sensitive species will also result in minimizing the introduction and expansion of invasive plants.

3.4 Fish and Wildlife Excluding Federally Listed Species

3.4.1 Affected Environment

No aquatic habitat is present in the Study Area and no fish, other aquatic wildlife, or riparian-dependent wildlife are present. Terrestrial wildlife that may be present are typical of rocky, upland areas within the Mojave Desert region. Vertebrate species likely to be present include several species of reptiles, small mammals (rodents), and migratory birds.

The project site is not ideal for large mammals due to the proximity of the parkway and high-density housing to the immediate west; however, there is a drainage feature to the west and large areas of open space to the east and north. Mammal species reported in the vicinity of the site include coyote (*Canis latrans*), desert cottontail (*Sylvilagus audubonii*), and ground squirrel (*Ammospermophilus leucurus*). In less developed areas there are also desert bighorn sheep (*Ovis canadensis nelsoni*) and kit fox (*Vulpes macrotis*) reported.

The proposed project area supports and is adjacent to lands that support wildlife characteristic of the Mojave Desert. Wildlife in the general area may include small mammals, rodents, birds, and reptiles. Biological diversity varies according to topography, plant community, and proximity to water, soil type, and season.

A 2024 Biological Evaluation for “Lake Las Vegas” Wireless Broadband and Cellular Communication Tower report dated April 2024 was prepared for the proposed project. A field

survey associated with the report was conducted on November 25, 2023. Wildlife activity was low during the survey which is not unexpected during that time of year. Temperatures were fairly cool which likely limited reptile activity. Few birds were observed. Mammals were detected mostly from scat or other sign. Mammals observed included coyote (*Canis latrans*) and black-tailed jackrabbit (*Lepus californicus*). Other species that may occur within 500 feet of the project area include:

White-tailed antelope squirrel (*Ammospermophilus leucurus*)
Merriam's kangaroo rat (*Dipodomys merriami*)
Cactus mouse (*Peromyscus eremicus*)
Canyon mouse (*Peromyscus crinitus*)
Desert woodrat (*Neotoma lepida*)
Western whiptail lizard (*Cnemidophorus tigris*)
Side-blotched lizard (*Uta stansburiana*)
Western fence lizard (*Sceloporus occidentalis*)
Red coachwhip snake (*Masticophis flagellum*)
Gopher snake (*Pituophis melanoleucus deserticola*)
Speckled rattlesnake (*Crotalus mitchelli*)
Mojave rattlesnake (*Crotalus scutulatus*)
Mourning dove (*Zenaida macroura*)
Northern mockingbird (*Mimus polyglottos*)
House finch (*Haemorhus mexicanus*)
Verdin (*Auriparus flaviceps*)
Black-throated sparrow (*Amphispiza bilineata*)
Common raven (*Corvus corax*)
Western kingbird (*Tyrannus verticalis*)
Gambel's quail (*Callipepla gambelii*)
Red-tailed hawk (*Buteo jamaicensis*)
American kestrel (*Falco sparverius*) (forage only)
Turkey vulture (*Cathartes aura*) (forage only)

3.4.2 Environmental Consequences

3.4.2.1 No Action Alternative

None of the impacts to fish and wildlife excluding federally listed species, or their habitat associated with construction, operation, and maintenance of the proposed project would occur under the No Action Alternative.

3.4.2.2 Proposed Action Alternative

The project site lacks ideal resources necessary for breeding such as reliable water sources, vegetative diversity (species and structure), hiding cover, or protected sites. Migratory bird use at the site would likely be transient (flying through to other areas) or for short-term foraging. Numerous bat species, including sensitive species are present in the region. Some of these species may forage in the area; however, no features likely to provide suitable roost sites for these species are found in the project footprint, but may be in the buffer zone, particularly in the hills to the east and north.

Wildlife species would be displaced as habitat is removed for the scope of the project. The primary direct impact of the Proposed Action on wildlife would be inadvertent killing or maiming of ground dwelling animals during construction and the loss of habitat.

Wildlife species may also be subject to increased predation as a result of activities associated with the proposed project. Predators such as coyotes and ravens are attracted to trash and litter that may be found at construction sites. Additionally, the construction of the communication tower would provide additional perching locations for raptors and ravens. The proposed activities would result in a total disturbance of approximately 0.72 acres of desert scrub vegetation. Restoration of temporarily disturbed areas (e.g. inadvertent impacts from equipment storage or delivery, trampling by workers, etc.) would occur upon completion of the project construction if it appears that the vegetation would not be able to regenerate without intervention. Given the amount of available foraging habitat in the area and in the surrounding areas of open space, minor impacts to common wildlife species are anticipated from the loss of 0.72 acres of disturbed desert scrub vegetation in the project area. The presence of an on-site biologist would further reduce the likelihood of impacts.

3.4.2.3 Long Term Effects

Impacts to wildlife species and their habitat can result from the incremental removal of undisturbed habitat. These impacts could have long-term effects on the local environment due to the slow recovery of arid regions and increase the potential for invasion of non-native plant species, thus leading to long-term loss of potential forage, and nesting/burrowing and cover sites.

The new access road could cause an increase in human activities in the project area, further increasing the risks of wildfires, vandalism, trash dumping, night lighting, and noise from vehicles/radios, and poaching. It should be noted, though, that the site and adjacent open areas

already have a high degree of these detrimental activities and the new facility would likely cause minor impacts on wildlife.

A new wireless broadband & cellular communication tower would increase the level of microwave and radio frequency radiation (RFR) in the area. The rapid increase in these radio frequency-emitting facilities in the region may have a harmful effect, particularly cumulatively, on wildlife, particularly birds, which may nest on towers. Studies have also found that RFR may affect birds and insects ability to navigate (Shepherd et al 2018), possibly affecting migration or local movements. Birds and possibly other animals may have decreased nest productivity within 200 meters of a tower (Balmori 2009).

3.5 Invasive Species/Noxious Weeds

3.5.1 Affected Environment

An April 2024 Biological Evaluation for “Lake Las Vegas” Cellular Communication Tower report was prepared for the proposed project. A field survey associated with the report was conducted on November 25, 2023. Noxious weeds are any species of plant likely to be a public nuisance, detrimental, or difficult to control (NRS 555.005) and that spread into areas where they are not native and typically displace native vegetation or bring about changes in species composition, community structure, or ecosystem function. The State of Nevada maintains a list of noxious weeds.

The site supports native desert scrub habitat. No noxious weeds were found within the project site or within 500 feet of the site.

3.5.2 Environmental Consequences

3.5.2.1 No Action Alternative

Under the No Action Alternative this 0.72-acre disturbance would not take place, and there would be no additional impacts from noxious and invasive weeds in the project area.

3.5.2.2 Proposed Action Alternative

The Proposed Action would create 0.72 new acres of disturbance that could introduce and/or spread noxious and invasive weeds that may occur in the area.

Removal of native vegetation and disturbance of soils during trenching could result in the establishment of noxious weeds. Ground disturbance can create conditions that favor invasive plant species over native vegetation. Additionally, weed seeds can be introduced via vehicles and equipment that are not properly cleaned or in seed mixes that are not weed-free. Ground disturbance in areas already containing weedy species can allow those populations to expand and infest other areas of native vegetation. Although there is risk of creating conditions

favorable to invasive plants as a result of the Project, these risks would be minimized through mitigation measures to the extent feasible.

The proposed access road has the potential to spread seeds from these invasive plants to other nearby areas. Avoidance and minimization measures are proposed to minimize the potential of spreading these plants to weed-free areas of the footprint as well as to minimize the potential of introducing new weeds to the area.

It should be noted that the survey of the site was performed at a time of year when some plants may not have been identifiable, particularly annual species and grasses. It is possible that other plants are present within the area that were not identified during the November 2023 survey.

3.5.2.3 Long Term Effects

The further dissection of intact vegetation communities across the desert results in increased susceptibility to invasion by non-native species due to soil disturbance. This also results in the removal of plants and associated soil crusts that sequester carbon and has the potential to increase fire return intervals due to invasion by non-native species which tend to increase fuel loads. Areas with increased non-native weeds, particularly grasses and annual herbs, are more susceptible to wildfire because annual grasses dry out quickly and create continuous fuel beds, increasing the risk that wildfire will spread and contribute to large, more contiguous, and more frequent fires (Balch et al 2012). This specific project, although relatively small, is contributing to permanent vegetation loss in this region, which already has impacts due to the nearby suburban area and other road and ROW improvements as well as the recreational uses in the immediate area.

3.6 Migratory Birds

3.6.1 Affected Environment

The Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703 et. seq.) protects migratory birds and their nests. A list of MBTA protected birds are found in 50 C.F.R. 10.13. The list of birds protected under this regulation is extensive and the project site has the potential to support many of these species, including sensitive species, and their nests. Typically, the breeding season is when these species are most sensitive to disturbance, which generally occurs from February 15th through August 31st.

Many species of birds migrate through the region. In southern Nevada, the Colorado River and its reservoirs, the Las Vegas Wash, and the Las Vegas metropolitan area provide important resources to migrating birds. Resident birds typical of the Mojave Desert include raptor species such as red-tailed hawks (*Buteo jamaicensis*), American kestrels (*Falco sparverius*), prairie falcons (*Falco sparverius*), and golden eagles (*Aquila chrysaetos*). Golden eagles and falcons prefer to nest in remote, undisturbed areas in extremely rugged terrain, but forage in desert valleys. Kestrels and red-tailed hawks are more adapted to human altered landscapes and may

even prefer suburban or agricultural areas where insects, rats, and rabbits may be more abundant. Burrowing owls may be present in open areas with fine soils or existing burrows. Suitable burrows were found within the project's buffer zone, but not within the footprint.

A variety of birds, such as Anna's Hummingbirds (*Calypte anna*), great-tailed grackles (*Quiscalus mexicanus*), Gambel's quail (*Callipepla gambelii*), western kingbirds (*Tyrannus verticalis*), mourning doves (*Zenaidura macroura*), and other species are residents of the urban-wildland interfaces of the Mojave Desert. Common ravens (*Corvus corax*) are abundant, particularly where human development provides supplementary food and where features such as utility poles provide elevated nest locations. Common ravens can learn to prey preferentially on juvenile Mojave desert tortoises and contribute to declines locally and regionally (Boarman 1993). Although common ravens are protected under the MBTA, minimizing the creation of potential new nests sites should be considered in the planning and construction of tall structures.

3.6.2 Environmental Consequences

3.6.2.1 No Action Alternative

No additional impacts to migratory birds or their habitat associated with construction, operation, and maintenance of the proposed project would occur under the No Action Alternative.

3.6.2.2 Proposed Action Alternative

Migratory bird species may potentially be displaced as 0.72 acres of habitat are disturbed within the project area. The primary direct impacts of the Proposed Action on birds would be inadvertent killing or maiming of ground dwelling species, displacement of individuals, the permanent loss and fragmentation of habitat, increased potential for harassment, and increased noise during project-related activities. Indirect impacts could include the introduction and spread of weeds and increased erosion potential. Migratory bird species are in the area at different times of year and the loss of their habitat should have a negligible impact on populations of the species throughout the region. Impacts to migratory birds are not anticipated to lead to further decline of species range-wide. Any impacts to migratory birds would be avoided and/or minimized through project specific stipulations and mitigation measures provided.

Under the MBTA, it is unlawful to take, kill, or possess migratory birds. Several birds protected under this regulation have the potential to nest within the project footprint and immediately adjoining areas. Typically, the breeding season is when these species are most sensitive to disturbance which is generally considered to occur from February 15 through August 31. Work during this period has the potential to disrupt nesting or directly destroy nests, eggs, or chicks. Project activities that may affect vegetation will occur outside of the breeding season to the maximum extent practicable. If construction and maintenance activities cannot occur outside February 15 to August 31, a Reclamation approved biologist will conduct nesting bird clearance

surveys. If any nesting bird activity is detected, all activities will cease until the biologist determines that no active nests, eggs, nestlings or recently fledged birds will be affected.

3.6.2.3 Long Term Effects

Impacts to migratory birds and their habitat can result from the incremental removal of undisturbed habitat. These impacts could have long term effects on the local environment due to the slow recovery of arid regions and increase the potential for invasion of non-native plant species, thus leading to long-term loss of potential forage, and nesting/burrowing and cover sites.

The new access road could cause an increase in human activities in the project area, further increasing the risks of wildfires, vandalism, trash dumping, night lighting, and noise from vehicles/radios, and poaching. It should be noted, though, that the site and adjacent open areas have a high degree of these detrimental activities already and the new facility would not likely cause a notable increase in impacts.

A new cellular communication tower would increase the level of microwave and radio frequency radiation (RFR) in the area. The rapid increase in these radio frequency-emitting facilities in the region may have a harmful effect on wildlife, particularly birds, which may nest on towers. Studies have also found that RFR may affect birds and insects ability to navigate (Shepherd et al 2018), possibly affecting migration or local movements. Birds may have decreased nest productivity within 200 meters of a tower (Balmori 2009).

3.7 Threatened, Endangered, or Candidate Animal Species

3.7.1 Affected Environment

The Mojave desert tortoise is the only Endangered Species Act (ESA) listed species potentially present within the vicinity of the project.

Mojave desert tortoises are widespread throughout the Mojave Desert, preferring valley bottoms and bajadas where soils are suitable for constructing burrows and suitable vegetation is present (creosote scrub with herbaceous understory).

Surveys conducted for Mojave desert tortoises found no burrows, scat, carcass fragments, or other sign within the project footprint or its buffer. There is, however, connectivity between the project site and vast areas of desert habitat to the east and north that may contain tortoises, and there is potential for individuals to wander into the project site.

3.7.2 Environmental Consequences

3.7.2.1 No Action Alternative

No additional impacts to desert tortoise or desert tortoise habitat associated with construction, operation, and maintenance of the proposed project would occur under the No Action Alternative.

3.7.2.2 Proposed Action Alternative

The proposed activities would result in a permanent loss of 0.72 acres of potential foraging habitat for the Mojave desert tortoise. Tortoises may be encountered in the project site or on access roads, though incorporated avoidance measures would minimize any impacts and would not likely result in a trend toward extinction or loss of viability of the Mojave desert tortoise.

Minor, temporary impacts could occur from vehicles and foot traffic from personnel at the project site, or during delivery of materials. The amount of habitat that would be disturbed is relatively small, and restoration of any unexpected temporary impact areas would occur upon completion of the work.

Effects from noise and increased human activity during the construction activities could cause tortoises to abandon their burrows and seek other existing shelters; however, no tortoise or tortoise sign was found during the November 2023 survey; thus, these impacts are negligible or absent/very unlikely.

The site does have connectivity to larger, more suitable areas of habitat. If a tortoise disperses into the project area from occupied areas, impacts could include loss of foraging, nesting, and cover sites. Juvenile desert tortoise may face an increased risk of predation from ravens attracted to the site and increased availability of perches.

The USFWS concurred with Reclamation's may affect, but not likely to adversely affect determination. An August 23, 2024 response indicated that the USFWS does not anticipate adverse effects to the Mojave desert tortoise based on the Proposed Action and project description. All minimization measures in informal consultation 2024-0131912-S7-001 would be implemented as appropriate.

3.7.2.3 Long Term Effects

Impacts to wildlife species, including the Federally listed Mojave desert tortoise, and their habitat can result from the incremental removal of undisturbed habitat. These impacts could have long term effects on the local environment due to the slow recovery of arid regions and increase the potential for invasion of non-native plant species, thus leading to long-term loss of potential forage, and nesting/burrowing and cover sites.

The new access road could cause an increase in human activities in the project area, further increasing the risks of wildfires, vandalism, trash dumping, night lighting, and noise from

vehicles/radios, and poaching, though, the site and adjacent open areas already have a high degree of these activities.

The tower would create a suitable nest site for common ravens, a known predator of desert tortoise. Although it is unlikely that a raven nest at this site would result in increased predation of tortoise since no tortoise were found in the area, any young ravens hatched at this site would learn to nest on human made structures (Coates et al 2014, personal observations and communications with P. Bloom and J. Kidd). This learned behavior would increase ravens' use of communication and utility tower structures in the region which could have an effect on tortoise populations, especially as development in the region encroaches into more remote areas of the desert.

3.8 Visual Resources

3.8.1 Affected Environment

The project area consists of 0.72 acres of desert land that is located approximately 100' east of East Lake Mead Parkway. The visual environment surrounding the proposed project consists of rolling terrain with sparse low growing shrubs and grasses. The site is located in an urban-wildlands interface of the community of Lake Las Vegas and Lake Mead National Recreation Area. Clark County Wetlands Park, a natural area associated with Las Vegas Wash, is located to the west. Development in the area includes a residential and resort community just to the west and northwest, open space/recreational areas to the north and east, open desert to the south, and a former mine to the southwest. Viewers in the project area primarily include motorists traveling along East Lake Mead Parkway east toward Lake Mead.

Section 102(a)(8) of the Federal Land Policy and Management Act (FLPMA) establishes the policy that public lands be managed in a manner that would protect the quality of scenic values (43 USC, Subsection 1701[a][8]). To meet this responsibility, the Bureau of Land Management (BLM) uses the visual resource management (VRM) system (BLM Manual 8400, Manual H-8410-1, and Manual H-8431). The VRM system is used to manage the quality of landscapes on public lands by inventorying scenic values and establishing management objectives, which determine the allowable intensity of development. Management objectives vary across four unique VRM classes (Class I through Class IV), which require different levels of management. VRM Class I is the most restrictive towards landscape alteration and development activities, and VRM Class IV is the least restrictive (BLM 2020). While this project is not on BLM land, the same protocols would be utilized to be consistent with nearby land management policies.

The Reclamation-owned project area is similar to The Las Vegas Resource Management Plan area, which identifies the area as VRM Class III (BLM 1998).

The VRM Class III objective is to partially retain the existing character of the landscape, while allowing for a moderate level of change from the characteristic landscape. Authorized actions

may alter the existing landscape, but not to the extent that they attract or focus attention of the casual viewer (BLM 1998).

Visual Contrast Rating

The degree to which a project adversely affects the visual quality of a landscape relates directly to the amount of visual contrast between it and the existing landscape character. The degree of contrast is measured by separating the landscape into major features (land, water, vegetation, and structures) then assessing the contrast introduced by the project in terms of the basic design elements of form, line, color, and texture (BLM Manual 8431, Visual Contrast Rating). The degree of contrast introduced by a proposed project is rated as none, weak, moderate, or strong. VRM Class III allows for moderate contrasts.

Proposed Design Features

No design features for specifically addressing potential impacts to visual resources other than color are identified in the Proposed Action's Plan of Development. There are no anticipated conflicts with visual resources. The project is located on a vacant parcel and immediately surrounded by vacant desert land. The Project would include the construction of a new telecommunications facility, to include one 198' lattice tower, and an access road.

All short-term construction activities and long-term operations would be within the 0.72 acres proposed construction site.

3.8.2 Environmental Consequences

3.8.2.1 No Action Alternative

No impacts to visual resources would occur under the No Action Alternative. The area would remain undeveloped desert land.

3.8.2.2 Proposed Action Alternative

Construction activities would increase the visible activity within the project area, including the use of heavy machinery, vehicles, and the presence of crews of up to six workers at a time. Heavy equipment and construction activities would be briefly visible from East Lake Mead Parkway and Lorin C Williams Parkway. During work involving tower installation cranes would be used, which would increase the visibility of construction activities. The surrounding area/adjoining properties are undeveloped land with the exception of the road to the west. Temporary construction activities would introduce forms, lines, colors, and textures that would result in moderate visual contrasts with the surrounding natural features in the landscape (land and vegetation). Temporary minor impacts associated with project construction would be consistent with VRM Class III objectives.

Upon implementation of the Proposed Action, the project would introduce additional man-made elements to the landscape, including a new telecommunications facility with an access

road, 70' x 70' compound, and 198' tower. Compared to the construction phase, ongoing maintenance activity associated with the new tower would be minimal.

The project would extend visual disturbances in the landscape by introducing new permanent vertical and horizontal elements into the landscape. The tower would appear as a tall, dull grey structure. While the addition of these geometric horizontal and vertical elements would result in moderate contrasts with the natural elements in the landscape (land and vegetation), non-natural features similar in line, form, color, and texture are already present in the landscape, due to the existing lines, roads, and other man-made structures. Since existing infrastructure is common throughout the viewshed, primarily to the west, the project is not expected to attract or focus the attention of viewers. The project would result in moderate contrast with the natural elements of the landscape and would conform to Class III management objectives.

3.8.2.3 Long Term Effects

The Proposed Action, in conjunction with other reasonably foreseeable projects, would result in additional man-made structures in the landscape. It is assumed that all reasonably foreseeable future development on Reclamation and public/private lands in the area would be subject to their respective VRM class management objectives, which would reduce the potential impacts to visual resources.

4.0 Coordination and Consultation

Consultation with Reclamation's consulting parties, in accordance with 54 U.S.C. § 306108, commonly referred to as Section 106 of the National Historic Preservation Act, and its implementing regulations at 36 CFR § 800, has been completed. A complete Class I files search and Class III cultural resource inventory of the project footprint and a half-mile buffer was completed. Reclamation reviewed the final cultural resources report (BCR Consulting, LLC 2025) in September 2025.

On June 21, 2024, Reclamation notified the Nevada State Historic Preservation Officer (NVSHPO) of the proposed undertaking, the proposed Area of Potential Effects (APE), the identification efforts that had been performed to date, and Reclamation's tentative finding regarding the proposed undertaking's effects to historic properties. Reclamation had no objection to the NVSHPO's recommended No Adverse Effect provided in its response, dated July 24, 2024.

On April 5, 2024, the 11 tribes that have expressed an interest in Clark County through the Federal Communication Commission's Tower Construction Notification System (TCNS) were notified of Reclamation's consideration of a permit to construct a cell tower on its lands. Whereas the Chemehuevi Tribe, Kaibab Band of Paiute Indians, Moapa Band of Paiutes, Skull Valley Band Goshute, and Timbisha Shoshone Tribe have expressed an interest in the area, each has indicated through the TCNS that, should the Applicant receive no response within 30 days of the initial notification, it may assume that those tribes have no concerns with the proposed undertaking. None of these responded within the requested thirty days. The Twenty-Nine Palms Band of Mission Indians responded to the notification, stating that it has no interest in the undertaking. Reclamation reviewed the list of interested tribes and the contact information for the tribes' representatives provided through the TCNS and contacted those whose contact information was known to be incorrect. On June 5, 2024, Reclamation delivered, via email and certified mail, digital and hardcopy versions of the undertaking's announcement and consultation invitation letter to the Fort Mojave Indian Tribe, Hualapai Tribe, Las Vegas Paiute Tribe, Moapa Band of Paiutes, and the Northwestern Band of the Shoshone Nation. The letter was also submitted to the Eastern Shoshone Nation via its website, in accordance with its requirements. The Hualapai Tribe elected to respond to Reclamation's notice, stating that it had no concerns with the proposed undertaking. Despite additional efforts, no other responses were received.

Prior to the issuance of a license permitting the Proposed Action, the Applicant submitted a redesign of the Proposed Action that necessitated a reinitiation of the Section 106 process (36 CFR § 800) due to the change in scope. Additional Class III cultural resource inventory of the project footprint and a half-mile buffer was completed (BCR Consulting, LLC 2025). On October 2, 2025, Reclamation notified the NVSHPO of the revised proposed undertaking, APE, and the additional identification efforts. Reclamation restated its earlier finding - that there would likely be no adverse effect to historic properties within the APE. On December 8, 2025, the NVSHPO

communicated, via email, that "[d]ue to ongoing staffing at the SHPO, our office was not able to issue a timely response. In accordance with regulations, and since the submission included a finding of effect, the Bureau of Reclamation has no further Section 106 consultation responsibilities with our office for this undertaking."

On October 2, 2025, Reclamation also delivered, via email and certified mail, digital and hardcopy versions of the revised undertaking's announcement and consultation invitation letter to the Fort Mojave Indian Tribe, Hualapai Tribe, Las Vegas Paiute Tribe, Moapa Band of Paiutes, and the Northwestern Band of the Shoshone Nation. The letter was again submitted to the Eastern Shoshone Nation via its website, in accordance with its requirements. Reclamation received no response, despite additional efforts, from the Eastern Shoshone Nation, Fort Mojave Indian Tribe, Hualapai Tribe, Las Vegas Paiute Tribe, and the Northwestern Band of the Shoshone Nation. The Moapa Band of Paiutes responded to the October 2 notice and invitation to consult on October 9, 2025, with several comments and concerns. Reclamation responded to these on October 29, 2025. On December 8, 2025, the Moapa stated that it had no further concerns and requested that it be contacted if there were any unanticipated discoveries.

Reclamation has determined that the proposed undertaking would likely have "no adverse effect" on historic properties. Reclamation has notified all consulting parties, has provided those parties with the appropriate documentation, has afforded those parties approximately 60 calendar days from their receipt to review the finding, and has received no objections to its finding. The Advisory Council on Historic Preservation, finally, is not reviewing the finding. Accordingly, Reclamation's obligations under Section 106 have been fulfilled. Reclamation shall carry out the undertaking in accordance with 36 CFR § 800.5(d)(1) and 36 CFR § 800.5(c)(1).

Informal consultation was initiated with the U.S. Fish and Wildlife Service on August 15, 2024. Based on surveys conducted in the project area and proposed minimization measures, Reclamation determined that the proposed project may affect, but is not likely to adversely affect, the Mojave desert tortoise. The service concurred with this determination on August 23, 2024.

5.0 List of Preparers

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6.0 References

- 2026, March 11, Wilderness Connect website, Wilderness Areas of the United States, <https://wilderness.net>
- United States Department of the Interior Geological Survey, Henderson Quadrangle 7.5 Minute Series Quadrangle, dated 1970 (photo revised 1983)
- Benchmark Maps. (2021). Nevada road & recreation atlas (8th ed.). Benchmark Maps. (Benchmark Maps, 2021)
- 2026, March 11, United States Fish and Wildlife Service website, Map of the National wildlife Refuge System and National Fish hatchery System, <https://www.fws.gov>
- 2026, March 11, Nevada Department of Wildlife website, Nevada Department of Wildlife Data Hub, <https://www.ndow.org>
- 2026, March 11, United States Department of Homeland Security Federal Emergency Management Agency (FEMA) website, FEMA Flood Map Service Center, <https://www.fema.gov/>
- 2026, March 11, United States Fish and Wildlife Service website, Wetlands Mapper, <https://www.fws.gov>
- Balch, J.K., Bradley, B.A., D'Antonio, C.M. and Gómez-Dans, J. (2013), Introduced annual grass increases regional fire activity across the arid western USA (1980–2009). *Glob Change Biol*, 19: 173-183. <https://doi.org/10.1111/gcb.12046>
- Site Diagrams dated 8/14/25 (Lake Las Vegas Electrical Site Plan LS-2 8.14.25)
- Gammon, T. (2025, May 27). Lake Las Vegas plan of development [PDF]. InterConnect Towers (ICT), LLC. <https://www.ictowers.com>
- Brunzell, D., & Shepetuk, N. (2025, September 4). Cultural resources assessment: Lake Las Vegas telecommunications tower project, Clark County, Nevada [PDF]. BCR Consulting LLC.
- Kidd Biological, Inc. (2024). Lake Las Vegas Cellular Communications Facility L0946: General Biological Analysis. Las Vegas, NV: Kidd Biological, Inc.
- U.S. Fish and Wildlife Service, Southern Nevada Fish and Wildlife Office. (2024, August 23). Informal consultation for the Interconnect Tower Project, Clark County, Nevada (Memorandum 2024-0131912-S7-001). U.S. Department of the Interior.