

**QUARTERLY PROGRESS REPORT
CLARK COUNTY
MULTIPLE SPECIES HABITAT CONSERVATION PLAN AMENDMENT**

Agency/Organization: WRA Inc.

Project Name: HCP Consultant for Multiple Species Habitat Conservation Plan

Project Number: 2019-WRA-1970b

Reporting Period: July 1, 2024, to September 30, 2024

Project Contact Name and Information:

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QUESTION 1: What did you accomplish during this reporting period? How did these accomplishments help you reach the goal of your project? If relevant, what indicators or benchmarks were used to determine your progress?

During this quarter, WRA prepared for and participated in three monthly progress meetings. In addition, WRA submitted Deliverable 36 (Quarterly Progress Report and Schedule Update) and M59 (Annual Project Review Presentation). For the Annual Project Review Presentation, WRA spoke at the 2024 MSHCP Progress Report Symposium on August 19. WRA presented on our development of a crediting methodology for riparian restoration, permitting approaches for Yuma Ridgeway's Rail, and updates on chapter revisions. WRA also submitted Chapter 9, Draft 2 (D64), which was rejected by the County. WRA addressed the County's comments and sent an augmented draft on September 28, which is pending acceptance/rejection by the County. While the deadlines for key project deliverables for this quarter were extended, including for Draft Cooperative Management Agreements (CMAs) Part 1 (D65) and Chapter 7, Draft 3 (D63), significant progress is being made towards their completion. For Chapter 7, WRA is discussing approaches for incorporating feedback from the County and Scientific Advisor Panel to update and improve content related to the impacts of climate change and thresholds for changed and unforeseen circumstances.

QUESTION 2: What, if any, problems were encountered? Briefly describe those problems and the manner in which they were dealt.

No significant problems were encountered this quarter. Similar to previous reports, additional revisions to draft chapters will depend on the passage of legislation and further discussion with BLM and the Service. As mentioned above, deadlines for key deliverables including Chapter 7, Draft 3 (D63), Chapter 9 Draft 2 (D64), and Draft CMAs Part 1 were extended to the next quarter. For Deliverables 63 and 64, WRA received robust County feedback and requires additional time to incorporate these comments. This will result in higher quality narrative as part of the final MSHCP. It is not anticipated that extending these deadlines will result in additional delays to the overall project schedule.

QUESTION 3: What, if any, proposed activities were not completed? Briefly describe those activities, the reasons they were not completed and your plans for carrying them out.

WRA has requested to extend the due date of Chapter 7, Draft 3 (D63) to allow for adequate time to incorporate feedback from the County's Science Advisory Panel. WRA has requested a deadline extension to December 31, 2024. Therefore, WRA anticipates completing this deliverable within the next quarter. WRA submitted Chapter 9 Draft 2 (D64) by the deadline. WRA received considerable feedback from the County, who did not accept the deliverable. WRA is revising this deliverable based on the County's feedback, and will resubmit D64 by the revised deadline next quarter. Additionally, the deadline for D65 (Draft CMAs, Part 1) was extended to next quarter to allow for more time to complete this deliverable. Last, the Quarterly Agency Coordination Meeting with BLM (M54) was cancelled this quarter since there were no pertinent progress updates to share with BLM.

The following deliverables for the reporting period were submitted and approved by the County:

- D34, M59

The following meetings and work products were completed for the reporting period:

- M53, M55, M56

QUESTION 4: What is the calculated percent of work completed?

Significant progress was made towards this quarter's deliverables. While some deliverables had deadlines that were extended (i.e., D63, D65), it is expected that these deliverables will be completed by the end of the calendar year. Additionally, Chapter 9, Draft 2 (D64) was submitted by the deadline, but was not accepted. WRA is addressing the County's comments and will submit the revised Chapter this quarter. Approximately 94% of the overall project to draft the MSHCP Amendment has been completed; however, several deliverables from the current contract may be moved to the next agreement. These discussions are in progress.

QUESTION 5: Do you foresee any upcoming problems with future project activities? If so, how do you propose to overcome those problems?

No new items that have not been previously discussed are foreseen. WRA will continue to coordinate with the County to update chapters and our approach as information becomes available and feedback is received. The congressional passage of SNEDCA and its timing could have an impact on completion of the draft MSHCP Amendment and Incidental Take Permit application submission. In response to this issue, last quarter WRA prepared an Alternative Strategies Memo (Deliverable 62) to identify potential alternative pathways for public and private Clark County applicants to obtain ESA take coverage for development and conservation activities. Feedback from the County on draft chapter 9 has been robust, but not substantive for a large-scale MSHCP. Feedback from the Scientific Advisor Panel on draft Chapter 7 will require further interpretation and discussion between WRA, the County and the Panel. WRA will continue to push for feedback from the regional office and other experts to ensure thorough review of the draft prior to submission of the application. This and the timeline for the NEPA process may delay the application submittal timeline, but WRA will maintain close and regular coordination with the County on this issue through progress meetings and/or other meetings as needed.

QUESTION 6: Is there anything else you want to tell the DCP about this project?

WRA remains unable to finalize the Conservation Strategy as it depends on BLM coordination. A draft MSHCP Amendment is completed awaiting incorporation of new species information and Service comments. The likelihood of SNEDCA's passage remains unclear. Since its success or failure to pass through Congress will impact the Conservation Strategy, alternative options to have a new ITP in place when the existing one expires were explored in D62 (Alternative Strategies Memo) which was submitted in Q2. Another alternative that has been discussed is coordination with BLM on incorporating the Conservation Strategy into the Las Vegas Resource Management Plan (RMP). The BLM is proposing to create a new programmatic EIS for updates to all RMPs in the state of Nevada which could delay the timeline for submission of the MSHCP if coordination with BLM and the RMP is the pathway to approval of mitigation on federal lands. The timeline for the programmatic RMP update is still unclear, but we will continue this discussion during the quarterly agency meetings which include BLM.

QUESTION 7: What was produced during the reporting period?

Completed deliverables:

- D34 (Quarterly Progress Report and Schedule Update)
- M53 (Monthly Progress Call)
- M55 (Monthly Progress Call)
- M56 (Monthly Progress Call)
- M59 (Annual Project Review Presentation)

Please report on the status of each Milestone and Deliverable, indicate whether they are not started, in progress, or completed and provide comments on the status as necessary.

The attached Gantt schedule reflects WRA's current understanding of the Permittee review schedule for draft chapters and anticipated deliverable dates for information required to update and finalize chapters. Based on this information and the schedule for final habitat distribution models to be received in spring of 2025, the Incidental Take Permit application may not be submitted until November or December 2025. This assumes the Service reviews the current draft of Chapter 3 in order to have a final MSHCP upon completion of the second draft of Chapter 3. Any further delays in review time, deliverables which WRA will be required to produce to complete the MSHCP, or conservation strategy route as described above, will most likely result in a delay in the application submittal timeline. The timing for a NEPA consultant to begin preparation of the EIS should also continue to be discussed as this could affect the application submittal date.



