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: October 1, 2024, to December 31, 2024

Project Contact Name and Information:Rob Schell; schell@wra-ca.com, 415-524-0460

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 (M57, M62, and M63), and participated in the Quarterly Agency Coordination Meeting with BLM (M58). In addition, WRA submitted this report (D73; Quarterly Progress Report and Schedule Update), Chapter 7, Draft 3 (D63) and Chapter 8, Draft 2 (D68), and re-submitted Chapter 9, Draft 2 (D64). WRA also completed end of year administrative deliverables including the 2025 Annual Work Plan (D35) and the Annual Administrative Record Updates (D37).

Deadlines for some tasks have been extended to next year and are included in the 2025 Annual Work Plan. For example, the GIS Data Coordination Task (D47) has been extended to spring 2025 in anticipation of the receipt of updated species models, and to align more closely with Chapter 5 updates. Other key project deliverables for this quarter were cancelled and are recommended to move to an upcoming new agreement, including Draft Cooperative Management Agreements (CMAs) Part 1 (D65) and Part 2 (D67) and the Final Project Review Summary Form and Project Claim Release (D38).

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. As in previous quarters, additional revisions to draft chapters will depend on the status of legislation and further discussion with BLM and the Service. As mentioned above, deadlines for key deliverables including the Riparian Restoration Crediting Methodology, Draft 2 (D66) and GIS Data Coordination (D47) were extended to the 2025 Work Plan. 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 move the Draft Cooperative Management Agreements (CMAs), Part 1 (D65) and Part 2 (D67) to the next contract. This change is due to committee markup to the Lands Bill that makes the ultimate inclusion of the Draft CMAs in the MSHCP Amendment unclear. The Riparian Restoration Crediting Methodology, Draft 2 (D66) deadline will be extended to next year, following additional comments from USFWS. This revision is also pending further discussion with the County and USFWS related to potentially including additional riparian species in the methodology. Last, the GIS Data Coordination task (D47) will also be moved to next year. The deadline for this task has been moved to next year to align more closely to when the County expects to receive updated species models. By postponing this task, the GIS data coordination task will align more closely with Chapter 5 updates, which will also incorporate the updated species models.

The following deliverables for the reporting period were submitted to the County:

- D73, D63, D64, D68, D35, D37

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

- M57, M62, M63, M58

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

Significant progress was made towards this quarter's deliverables. Large deliverables such as Chapter 7, draft 3 (D63) were completed. While some deliverables had deadlines that were extended (i.e., D47, D65), it is expected that these deliverables will be completed by the necessary timeframe. Approximately 95% of the overall project to draft the MSHCP Amendment has been completed. Several deliverables from the current contract will 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 the timing of this could have an impact on completion of the draft MSHCP Amendment and Incidental Take Permit application submission. It appears increasingly unlikely that this legislation will pass in this legislative session. In anticipation of this issue, in spring 2024 WRA prepared an Alternative Strategies Memo (Deliverable 62) to identify potential alternative pathways for public and private Clark Country applicants to obtain ESA take coverage for development and conservation activities. 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?

The draft MSHCP Amendment awaits receipt and incorporation of new species information and Service comments. WRA has included a complete revision to the Conservation Strategy (all

sections) in the 2025 work plan, but this revision is dependent on BLM coordination. Passage of SNEDCA in the legislature is currently considered unlikely. Since SNEDCA's 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 2024 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 Amendment, 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.

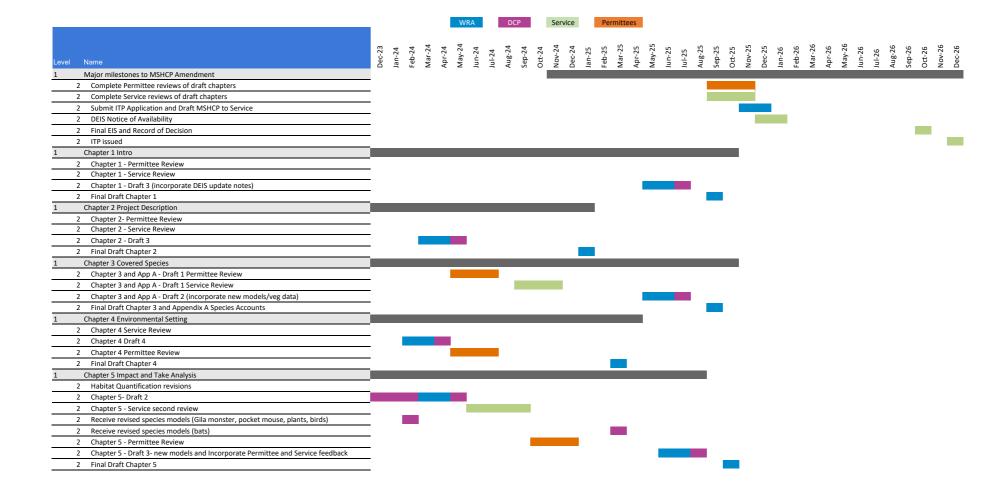
QUESTION 7: What was produced during the reporting period?

Completed deliverables:

- D73 (Quarterly Progress Report and Schedule Update)
- D63 (Chapter 7, Draft 3)
- D68 (Chapter 8, Draft 2)
- D64 (Chapter 9, Draft 2)
- D35 (Annual Work Plan)
- D37 (Annual Administrative Record Updates)
- M57 (Monthly Progress Call)
- M62 (Monthly Progress Call)
- M63 (Monthly Progress Call)
- M58 (Quarterly Agency Coordination Meeting)

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 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.



Page 1 1/5/2025



Page 2 1/5/2025