

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, 2025, to September 30, 2025

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?

WRA completed multiple deliverables this quarter.

During this quarter, WRA prepared for and participated in three monthly progress meetings (M72, M75, M76) and participated in the Quarterly Agency Coordination Meeting with BLM (M73). In addition, WRA completed GIS Data Coordination (D47), and the ACEC Nominations (D71).

Additional deliverables that were originally due this quarter will either be cancelled and moved to the next agreement, or have deadlines that will be extended pending an amendment request. These changes are necessary since the content of the deliverables (detailed in questions below) is dependent on the finalization and receipt of updated species models from UNR, which is currently outstanding.

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, WRA is anticipating new species modeling data from UNR, and will continue extending deadlines of deliverables that are dependent on receipt of this data, as needed. It is not anticipated that extending these deadlines will result in additional delays to the overall project schedule, which was updated this quarter to reflect a new target application submittal date of spring 2026.

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 submitted a minor amendment request to extend the deadline for the Covered Species Analysis Report, Draft 2 (D76) from September 30 to October 17, 2025. The due date extension was requested since WRA has not yet received the finalized species modeling that will be incorporated into the report draft; however, since the anticipated date of receipt for the new models is currently unknown, we anticipate either requesting an additional extension of this deadline or moving D76 to the new agreement.

In the third quarter, Amendment C30 extended the deadline for Chapter 3 and Appendix A, Draft 2 (D18) from June 30 to October 31, 2025; however, we anticipate cancelling this task and moving it to the next agreement, since its content is also dependent on the updated species models from UNR.

The following deliverables for the reporting period were completed and/or submitted to the County:

- D47, D71

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

- M72, M73, M75, M76

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

Approximately 96 percent of the overall project to draft the MSHCP Amendment has been completed. Remaining work products are largely revisions of existing draft deliverables.

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

The congressional passage of SNEDCA is currently considered unlikely; this will likely have an impact on completion of the draft MSHCP Amendment and Incidental Take Permit application submission. In spring of 2024, 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. WRA will continue to seek feedback from the regional office and other experts to ensure thorough review of the draft MSHCP 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. WRA will also continue to coordinate with the County to update chapters and our approach as information becomes available and feedback is received.

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

Currently, the draft MSHCP Amendment awaits receipt and incorporation of new species modeling data and comments from the Service. Since the passage of SNEDCA through Congress is increasingly unlikely, impacts to the Conservation Strategy should be considered, as discussion on alternative options to have a new ITP in place when the existing one expires should continue. 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 with BLM.

WRA is also tracking other changes at the federal level that may impact this project, such as the redefinition of “harm” as it pertains to “take” in the Endangered Species Act (ESA) and the Migratory Bird Treaty Act (MBTA). WRA is checking in with Clark County and the project team to assess how these changes may impact the project while proceeding to develop the MSHCP Amendment as planned.

QUESTION 7: What was produced during the reporting period?

Completed Deliverables:

- D47 (GIS Data Coordination)
- D71 (ACEC Nominations)
- M72 (Monthly Progress Call [Jul 2025])
- M73 (Quarterly Agency Coordination Meeting with BLM)
- M75 (Monthly Progress Call [Aug 2025])
- M76 (Monthly Progress Call [Sept 2025])

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. This Gantt schedule covers major deliverables through the anticipated February 2027 Project Closeout date for the upcoming agreement. Based on this information and a tentative assumption that final species models be received by December 31, 2025, the Incidental Take Permit application may not be submitted until June 2025. Any further delays in review time, additional 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.

