

# FINAL Scoping Report for the Las Vegas/Pahrump RMP Revision



LAS VEGAS and PAHRUMP FIELD OFFICES



May 2010

### Mission Statement

It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

# **Final Scoping Report**

for the

## **Las Vegas/Pahrump Resource Management Plan and Environmental Impact Statement**

for

**Public Lands Administered**

by the

**Bureau of Land Management  
Southern Nevada District Office**

**Nevada**

*Prepared by*

**United States Department of the Interior  
Bureau of Land Management  
Southern Nevada District Office**

**May 2010**

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## EXECUTIVE SUMMARY

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This report documents the scoping process for the Bureau of Land Management's (BLM) Las Vegas/Pahrump Field Office Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The report summarizes the comments provided by the public and identifies the issues to be carried forward in the alternative development process.

The purpose of scoping is to provide the public an opportunity to identify issues important to the future management of public lands and resources, and to determine what issues will be addressed in the EIS. These issues will guide the development of alternatives that will be evaluated in the EIS and will ultimately guide development of the RMP. Scoping also provides the public the opportunity to learn about the management of public lands, and to assist the BLM by identifying the public's concerns regarding the resources within the planning area.

Throughout the scoping period, the BLM Las Vegas and Pahrump Field Offices (LVFO/PFO) fostered open communication and solicited input beyond the standard requirements. Meetings were held in seven locations throughout the planning area, including Las Vegas and Pahrump. Comments were accepted in a variety of formats to ensure that those who wished to participate could do so effectively.

### HOW TO READ THIS REPORT

This report summarizes the issues identified during the scoping period, including concepts discussed at the public scoping meetings and letters received from individuals and organizations. It also contains the planning criteria and a general planning schedule for the RMP. One of the main purposes of the report is to provide information to the BLM regarding the values, concerns, and issues of interest to the public. It is important to note that this report does not attempt to define every BLM policy, practice and term used or referred throughout the report. For information regarding specific policy and practices, readers are encouraged to access the BLM's public website at [www.BLM.gov](http://www.BLM.gov) or contact the Las Vegas or Pahrump Field Offices. This report is made available to the public in accordance with Code of Federal Regulations (CFR) 1610.2(d) in order to allow those who provided input during the scoping process an opportunity to verify that their issues were properly identified and recorded.

Chapter 1 describes the scoping process and gives an overview of the planning area, within which the RMP Revision will address landscape-level management. Similar to information provided to the public during the scoping meetings, this information allows members of the public to determine if their concerns or issues occur within the planning area and should be brought to the BLM attention for consideration in the RMP Revision.

Chapter 2 reports the public scoping results, beginning with a summary of the BLM public outreach efforts, which included seven public scoping meetings. A total of 282 individuals signed-in at the meetings. A description of the meeting and a summary of public comments received is provided for each meeting. The latter portion of Chapter 2 contains a description of written public scoping comments.

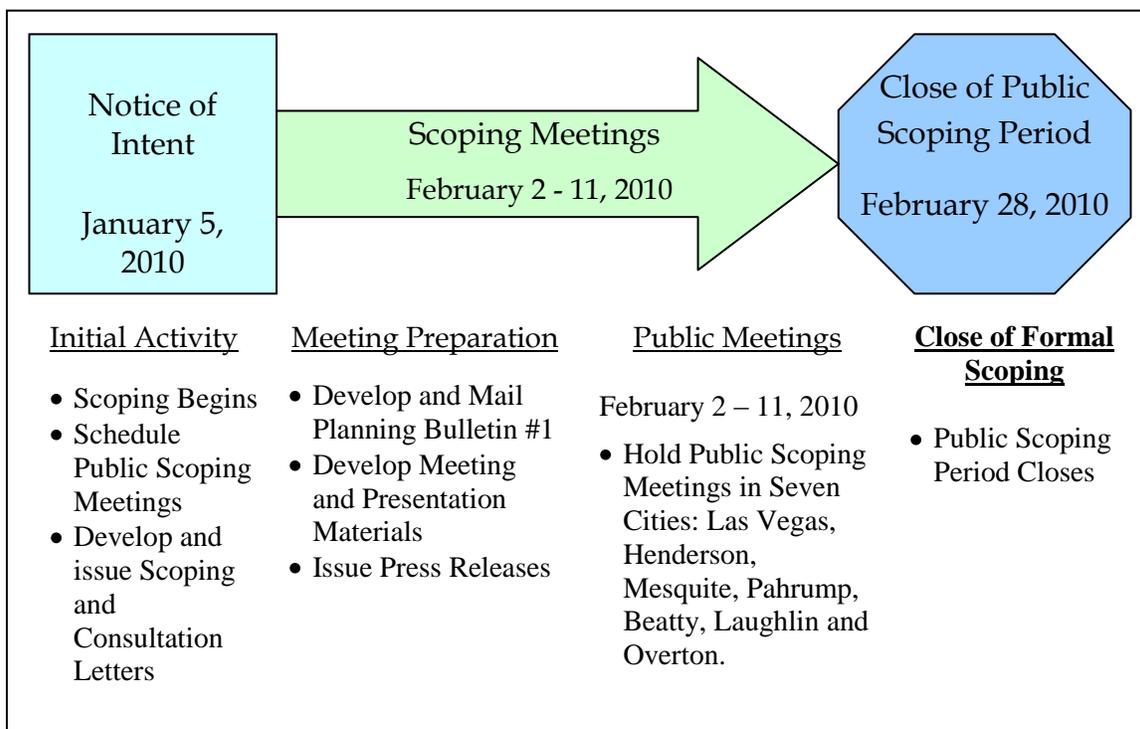
Chapters 3 and 4 report on the issues identified through the scoping process. Chapter 3 identifies the issues that will be carried forward to the alternative development process. Chapter 4 identifies the issues that will not be incorporated into the alternatives and provides justification for that decision.

Chapter 5 identifies the planning criteria to be used throughout this planning process. Chapter 6 reports the data identified by the public during the scoping process.

## PUBLIC SCOPING AND ISSUE IDENTIFICATION

The planning process began with the publication of the Notice of Intent (NOI) in the *Federal Register* on January 5, 2010. The scoping period included seven public scoping meetings. The formal scoping period ended on February 28, 2010. Public scoping occurs at the beginning of the planning process and represents one step of public involvement (Figure 1). There will be additional opportunities for public input throughout the planning process (Figure 5).

**Figure 1. Public Scoping Process Timeline**



Throughout the scoping period, 263 individuals provided comments concerning the future management of the planning area. Analysis of these individual’s submissions resulted in the identification of approximately 540 comments with issues to be addressed during development of the Las Vegas/Pahrump RMP. A majority of comments emphasized off-highway vehicle (OHV) management, recreation, and renewable energy development. Other issues of high interest include, access to public lands, and lands and realty management. Throughout the scoping process, issues were raised dealing with the following resources and resource uses:

- Access and Travel Management
- Cultural Resources
- Fish and Wildlife
- Fuels and Fire Management
- Lands and Realty Management
- Livestock Grazing
- Minerals and Energy Resources
- OHV Use
- Paleontology
- Recreation
- Social and Economic Value
- Soil, Water and Air Resources, including Water and Air Quality
- Special Management Area Designations and Wilderness Characteristics
- Threatened and Endangered Species
- Vegetation
- Visual Resource Management
- Wild Horses and Burros
- General Comments

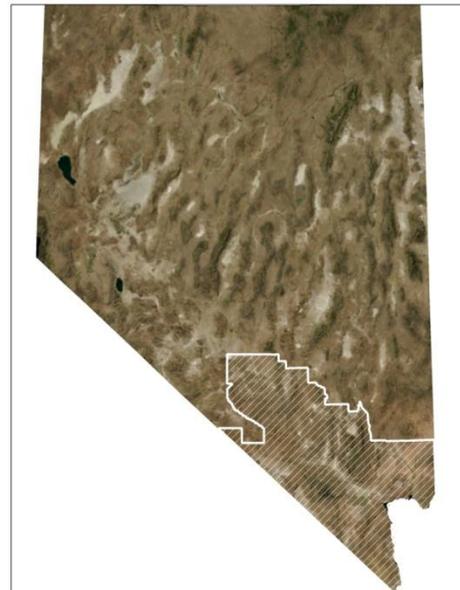
## 1.0 INTRODUCTION

The planning area is located in southern Nevada and includes all public lands and federal mineral estate managed by the Bureau of Land Management (BLM) Las Vegas and Pahrump Field Offices (LVFO/PFO). The planning area is bordered by Nye and Lincoln Counties on the north, California and the Death Valley National Park on the west, and the National Park Service Lake Mead Recreation Area to the east along the Arizona border. Figure 2 shows the planning area in relation to the State of Nevada. The planning area encompasses a total of approximately 3,130,157 acres of public lands in Clark County and a portion of southern Nye County. In addition, the BLM manages one million acres of split-estate lands in the planning area. The split-estate lands are of two types, one where the subsurface or mineral estate or a portion thereof is owned by the Federal government and the surface is under private ownership, and another where the Federal government owns the surface and the subsurface minerals or a portion thereof are in private ownership.

Southern Nevada is characterized by diverse geographical features. Landforms range from rugged mountain ranges, to sloping bajadas and broad valleys. The Colorado River and several of its tributaries flow through the eastern portions of the planning area. New communities and developments, such as Laughlin, are expanding along the Colorado River, providing jobs and recreational opportunities in previously undeveloped areas. The Las Vegas Valley portion of the planning area is a major topographic feature, trending north-south through the middle of the planning area. This valley has a burgeoning metropolitan area, consisting of the cities of Las Vegas, North Las Vegas, Henderson, and Boulder City. Much of the planning area, however, remains remote and rural, with the population dispersed over large areas or clustered in small communities. The Pahrump area is experiencing rapid growth as well. The public lands in the planning area have important scenic, recreational, mineral, archeological, wilderness, wildlife, and vegetative values. Public uses of these resources often have an important role in the growth and development of local communities.

The key issues in the Las Vegas and Pahrump Field Offices are largely based on the growing population in surrounding communities and the increasing demand for use of public lands and natural resources. The growing populations in Clark County and southern Nye County are expanding the wildland-urban interface areas. The Las Vegas Resource Management Plan (RMP) was completed in 1998 and does not adequately address new public needs, demands on public lands, resource conflicts, resource uses, wildlife habitats, and resources impacted by a dramatic rise in use. The Las Vegas/Pahrump RMP is needed to ensure that public demands, resources, and resource uses are properly managed to continue to allow for multiple-use while protecting sensitive resources. Several major resource issues need to be addressed by the Las Vegas/Pahrump RMP including renewable energy development, visual resource management (VRM), lands and realty actions, areas of critical environmental concern (ACECs), right-of-ways, recreation, off-highway vehicle (OHV) designations, special recreation management areas (SRMAs), land disposals, and wildland-urban interface.

The Las Vegas/Pahrump RMP will establish consolidated guidance and updated objectives and management actions for public lands in the planning area. It will be comprehensive in nature and will



**Figure 2. Planning Area**

address issues applicable to public lands within the planning area that are identified through agency, interagency, and public scoping efforts. The Las Vegas/Pahrump RMP will also fulfill requirements and obligations set forth by the National Environmental Policy Act (NEPA), the Federal Land Policy and Management Act (FLPMA), and BLM land use planning policy. In compliance with NEPA regulations, the LVFO/PFO initiated a scoping process to identify issues pertaining to the development of the RMP. This report describes the scoping process, provides a comment summary and issue identification, and provides updated planning criteria and a project schedule.

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## 2.0 PUBLIC COMMENTS

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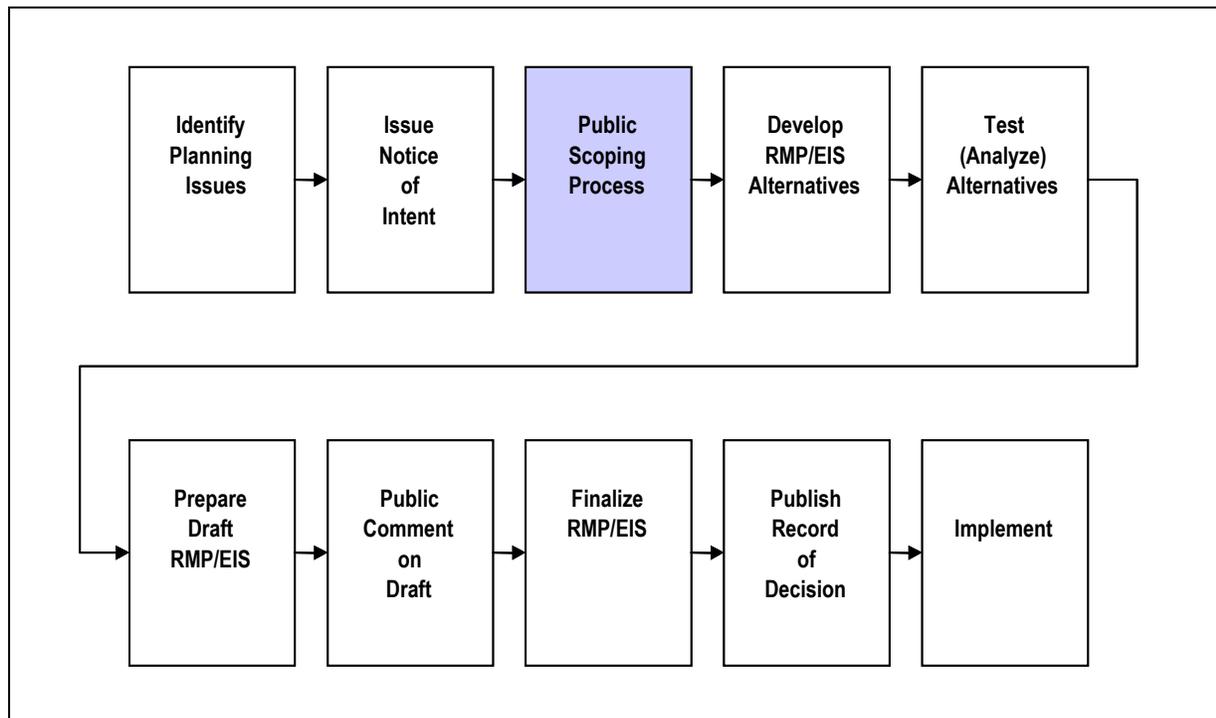
In January 2010, the Bureau of Land Management (BLM) Las Vegas and Pahrump Field Offices (LVFO/PFO) initiated its scoping process with the publication of the Notice of Intent (NOI). Scoping is required by the National Environmental Policy Act (NEPA) in the early stages of developing an Environmental Impact Statement (EIS) to determine the scope and significance of issues related to a proposed action such as the development and implementation of a new resource management plan (RMP) (40 Code of Federal Regulations [CFR] 1501.7). Due to its position at the beginning of the planning process, scoping is not intended to be associated with a presentation of the affected environment, alternatives, or the identification of potential effects. At the scoping phase of the NEPA process, the scope of the issues to be addressed in the EIS is still being determined. While internal review of the proposed action can lead to the identification of issues, public scoping is integral to identify the public's and interested parties' concerns and issues important to the management of the area, as well as issues and conflicts to be examined in the planning process and ultimately, decisions in the RMP. The scoping process is designed to encourage public participation and to solicit public input, ensuring that no issues are overlooked in the environmental review and planning process.

The importance of public scoping becomes evident as the planning process progresses (Figure 3). Public comments on what issues should be addressed in the RMP and EIS are placed in one of the three following categories:

- Issues to be addressed in the plan (Chapter 3 of this report)
- Issues to be addressed through other policy or administrative action (Chapter 4) or
- Issues beyond the scope of the plan (Chapter 4)

Rationale is provided for each issue placed in the latter two categories. Alternatives will be developed and analyzed to resolve the issues from the first category that were identified during the scoping period and the Draft RMP/EIS will be subsequently published and made available for public review. It is important to note that public comments can be provided during the entire planning process as long as they are not intended for a specific review of a document (such as the 90 day comment period on the Draft EIS).

Figure 3. Planning Process



In accordance with the planning schedule (Chapter 7), the planning process formally began with the publication of the NOI in the *Federal Register* on January 5, 2010, which documents the BLM's intent to prepare an RMP (Appendix B). The NOI noted that "comments on issues may be submitted in writing until February 4, 2010." However, the NOI also specifically noted that "all comments must be received prior to the close of the scoping period or 15 days after the last public meeting, whichever is later." The last public meeting was held on February 11, 2010 in Overton, NV. For ease of identification, the BLM decided to close the scoping period on February 28<sup>th</sup> (17 days after the last public scoping meeting), thereby ensuring consistency with the language in the NOI. Cognizant that there could be some confusion in the closing of the scoping period, the BLM published the February 28<sup>th</sup> date through a variety of media over several weeks, including a project newsletter sent to almost 1,300 addresses and also posted on the BLM's Southern Nevada District Office website, legal notices published in five separate papers throughout southern Nevada (each notice run at least two separate issues), an official press release announcing the public scoping meetings, and in several locations at each scoping meeting. The formal public scoping period ended on February 28, 2010. Written comments with a postmark on or before the 28<sup>th</sup> were accepted for approximately a week following that date to allow for mail delays.

The BLM invited 46 Federal, State, and local governments, agencies, or organizations, to become cooperating agencies for the RMP Revision. Table 1 lists the governments, agencies and organizations that were invited to participate, as well as the 13 that accepted the invitation as of the date this scoping report was published. Agreements are being developed to formalize the cooperating agency agreement and relationship responsibilities. There are also agreements between the BLM and the State of Nevada and the U.S. Fish and Wildlife Service (USFWS), including both of these as cooperating agencies. The rest of this chapter will address the receipt and summary of scoping comments from these agencies and public.

**Table 1. Agencies Extended Cooperating Agency Invitations**

<b>Agency/Organization</b>	<b>Agency/Organization</b>
BLM Arizona Strip District Office (invited to cooperate, as well as to coordinate management)	National Park Service, Mojave National Preserve
BLM Barstow Field Office (invited to cooperate, as well as to coordinate management)	Nellis Air Force Base
BLM Caliente Field Office (invited to cooperate, as well as to coordinate management)	Nevada Department of Agriculture
BLM Kingman Field Office (invited to cooperate, as well as to coordinate management)	Nevada Department of Conservation and Natural Resources
BLM Needles Field Office (invited to cooperate, as well as to coordinate management)	Nevada Department of Minerals
BLM Tonopah Field Office (invited to cooperate, as well as to coordinate management)	Nevada Department of Transportation
Boulder City, Nevada*	Nevada Department of Wildlife*
Bureau of Indian Affairs	Nevada State Historic Preservation Office
Bureau of Reclamation, Lower Colorado Regional Office*	Nevada State Land Use Planning Agency
City of Henderson, Nevada*	Nye County, Nevada*
City of Las Vegas, Nevada*	Regional Transportation Commission
City of Mesquite, Nevada*	Southern Nevada Water Authority
City of North Las Vegas, Nevada*	U.S. Environmental Protection Agency, Region IX
Clark County, Nevada*	U.S. Fish and Wildlife Service, Desert National Wildlife Refuge Complex
Clark County Regional Flood Control District*	U.S. Fish and Wildlife Service, Ecological Services
National Park Service, Death Valley National Park*	U.S. Forest Service, Spring Mountains National Recreation Area*
National Park Service, Lake Mead National Recreation Area*	

\* Accepted invitation

The BLM also initiated preliminary outreach for consultation efforts with Native American Tribes. Table 2 lists tribes to whom the BLM mailed letters. These preliminary communications also extended invitations for these tribes to be cooperating agencies. None of the tribal entities have accepted the invitation as of the date this report was published.

**Table 2. Native American Tribes Contacted for Cooperating Agency and Consultation**

<b>Tribal Organization Contacted</b>	<b>Tribal Organization Contacted</b>
Cedar Band, Paiute Indian Tribe of Utah	Kaibab Paiute Tribe
Chemehuevi Indian Tribe	Kanosh Band, Paiute Indian Tribes of Utah
Colorado River Indian Tribes	Las Vegas Paiute Tribe
Fort Mojave Indian Tribe	Moapa Band of Paiutes
Hualapai Tribal Council	Pahrump Paiute Tribe

Tribal Organization Contacted	Tribal Organization Contacted
Indian Peaks Band, Piute Indian Tribes of Utah	Timbisha Shoshone Tribe
Inter-Tribal Council of Nevada	

## PUBLIC SCOPING MEETINGS

Public scoping meetings provide an opportunity for interested parties to submit scoping comments and to be involved early in the planning process (40 CFR 1501.7). These meetings are especially important when there is “substantial environmental controversy concerning the proposed action or substantial interest in holding the [meeting]” (40 CFR 1506.6c1).

### Meeting Logistics and Attendance

The NOI (Appendix B) announced that the BLM would hold local public scoping meetings. The actual dates, meeting locations and times, as well as instructions for providing comments by February 28, 2010, were later announced in a legal notice published in five separate newspapers throughout the planning area as well as in a press release (Appendix C). The legal notices ran twice in each newspaper (one each week for the two weeks prior to the meeting for that particular city or town), with the exception of the Las Vegas Review Journal which published the notice three times. The notice placed in each of the newspapers and on flyers in the communities stated that comments for scoping would be accepted through February 28, 2010. The BLM held scoping meetings in Las Vegas, Henderson, Mesquite, Pahrump, Beatty, Laughlin, and Overton. These meetings were announced in the local media (Appendix C), as well as through a planning bulletin (Appendix D) that was mailed to hundreds of individuals, organizations and agencies and passed out at each of the scoping meetings. The planning bulletin provided the same information published in the newspapers regarding the meeting locations and times and instructions for submitting comments through February 28th. The bulletin also explained the planning process and provided background information about some of the major issues that would be addressed during the planning process. It also invited the identification of new issues by the public for consideration in the RMP Revision. The same information was also available on the Nevada BLM website ([www.blm.gov/nv/st/en/fo/lvfo.html](http://www.blm.gov/nv/st/en/fo/lvfo.html)). The BLM also posted fliers throughout the two counties in locations of heavy traffic such as post offices. All newspaper notices, bulletins and flyers provided consistent meeting locations, dates, times and instructions for submitting public scoping comments.

Seven public meetings were held over a two-week period in February 2010. The total registered attendance for all seven meetings was 282 people (Table 3).

**Table 3. Public Scoping Meetings: Location and Attendance**

Meeting Location	Meeting Date	Registered Attendance
Las Vegas, NV	February 2, 2010	66
Henderson, NV	February 3, 2010	63
Mesquite, NV	February 4, 2010	81
Pahrump, NV	February 8, 2010	28
Beatty, NV	February 9, 2010	5
Laughlin, NV	February 10, 2010	8
Overton, NV	February 11, 2010	31
<b>Total</b>		<b>282</b>

Information available at each meeting included a handout of an overview of the planning process with a map of the planning area and a handout of the comment form (Appendix E). Comment forms were available for attendees to make further scoping comments after the meeting.

The meetings were conducted in an open house type format with attendees coming and going throughout a three hour period. Three brief informational presentations on the planning process and need for the RMP Revision were given at the beginning of the meeting and on the hour (5:00 PM, 6:00 PM and 7:00 PM respectively). Following each presentation, a short question and answer period allowed those in attendance to ask questions to the Las Vegas Field Office Manager. The BLM specialists from a number of resource area disciplines, such as recreation, wildlife, lands and realty, wild horses and burros and renewable energy were also available to answer questions and provide additional information on these and other specific issues throughout the meeting. Twelve informational posters and maps regarding specific resource uses and issues were located throughout the room. The posters served as a starting point for attendees to frame comments and raise issues with the resource specialists related to the boards, or to identify issues that were not represented by the available materials. The posters and maps were also useful in allowing attendees to provide feedback on specific policies and practices provided on the posters, as well as issues with boundaries on the maps. A number of useful comments came from these interactions and will be used in framing alternatives for the RMP. For those who preferred not to speak at the public scoping meetings, several other methods of providing comments were discussed, including written comment forms, email, and the BLM website. The facilitators encouraged comments in any one of these other forms.

## Number and Type of Comments Received

There were 50 individual oral comments from 38 people recorded during the seven public meetings. Individual comments were coded by primary topic/concern, regardless of the position of the comment. For example, a comment to keep the area largely open to off-highway vehicle (OHV) use and a comment to close vast areas to OHV use would both be categorized as an OHV comment. A wide range of comments was recorded, with some topics being repeated more often than others. Some comments addressed more than one comment category. Such comments were generally coded by the primary topic unless the other topics were of equal importance to the issue being presented, in which case the comment was coded under several comment categories. An example of this includes comments regarding OHV access for livestock administration purposes. There are three potential topics presented, with access as the primary topic. Comments coded as “General” typically discussed very broad management concepts, administrative suggestions, or very specific issues.

The resulting enumeration (Table 4) indicates the relative interest of meeting attendees towards various broad topics in a position-neutral perspective. This enumeration is not intended to show or indicate “weighting” of comment categories or bias towards any position; it merely indicates the relative level of interest in a specific area.

**Table 4. Public Scoping Meetings: Comment Categories**

Category	Number of Comments	Percent of Total
Access & Travel Management	5	10%
Fish & Wildlife	1	2%
Lands & Realty Management	1	2%
Livestock Grazing	1	2%

Category	Number of Comments	Percent of Total
Minerals & Energy Resources	11	22%
OHV Use	20	40%
Recreation	3	6%
Special Management Areas & Wilderness Characteristics	1	2%
Wild Horses and Burros	2	4%
General Comments	5	10%
<b>Total</b>	<b>50</b>	<b>100%</b>

## Summary of Meeting Comments

Although each public scoping meeting raised unique issues and concerns, a number of common elements materialized. A common concern was OHV use and route designations. A majority of attendees expressed concern over OHV management and designation of motorized routes on public lands particularly management of OHVs in relation to “sensitive areas” such as tortoise areas or cultural sites. Most attendees supported increased education and enforcement of OHV use. In general, attendees preferred maintaining or increasing, rather than limiting, motorized access within the planning area. Several attendees commented on general access to public lands. Mention of Revised Statute (RS) 2477 was frequently related to these comments. Access to public lands for senior citizens was also mentioned in support of maintaining or increasing OHV use.

Minerals and energy resources was another topic mentioned at each scoping meeting, most of which related to solar and wind development. Attendees expressed concern for large energy developments in close proximity to their communities and within areas where they enjoy OHV use. Attendees expressed a desire to preserve areas around communities for recreation and to maintain a natural viewshed.

Economic and social connections to public land use were often related to the issues noted above. Attendees encouraged the BLM to consider impacts of plan decisions on the local economies and culture. Commenters were concerned that increased restrictions would lead to a change in their traditional use of public lands surrounding their communities.

## Comment Summary by Meeting Location

While addressing the scoping meetings collectively provided the above information, each public scoping meeting raised a unique combination of issues and concerns. The following is a summary of meeting comments from each scoping meeting.

### Las Vegas (February 2, 2010) - Total Registered Attendance: 66

Comments received from the Las Vegas scoping meeting primarily focused on access and OHV management, lands and realty and renewable energy resources. The most common positions advocated maintaining motorized and non-motorized access to roads and trails and ensuring access to public lands for elderly or disabled persons. In addition, some commented on designating separate routes or trails for motorized or non-motorized use. There were also a few comments regarding NEPA and RMP planning procedures, particularly as they relate to recent or soon to be made BLM actions and decisions before the new RMP is completed.

Other comments received at the Las Vegas scoping meeting include the following:

- Control livestock grazing trespass,
- Identify lands for acquisition and disposal,
- Maintain and acquire rights-of-way (ROW),
- Monitoring the effects of management decisions,
- Inventory roads and trails,
- Desert tortoise habitat.

**Henderson (February 3, 2010) - Total Registered Attendance: 63**

The majority of public comments received from the Henderson scoping meeting focused on OHV management and recreation. Comments emphasized the need to increase areas available to OHV users, including re-opening areas that have recently been closed. The need for reliable signage and maps regarding areas and roads open or closed to OHV use was mentioned. The need for more public input into the planning process was emphasized as well as coordinating planning with adjacent BLM lands. It was suggested that the BLM coordinate with local government and develop partnerships with local groups to develop the plan and manage the land. Solar and wind energy development were also discussed by attendees, with most comments suggesting that this type of energy development not be concentrated in southern Nevada and kept away from communities.

Other comments received at the Henderson scoping meeting include the following:

- Maintain OHV access,
- Protect traditional and historic use of trails and public lands,
- Manage trails for multiple use,
- Preserve motorized trail use,
- Inventory transportation routes,
- Limit land disposal areas,
- Areas of critical environmental concern (ACEC),
- Do not allow solar development,
- Do not allow wind development,
- NEPA and RMP planning process and timeline,
- Involve the public in all decisions,
- Coordinate planning with adjacent BLM offices/use them as a model.

**Mesquite (February 4, 2010) - Total Registered Attendance: 81**

The meeting held in Mesquite had the highest number of attendees. Comments received at the meeting covered various topics including recreation, OHV use, energy development and socioeconomic impacts to local communities. Comments regarding OHV use were the most common and the attendees expressed frustration over recent closures, particularly those in the Gold Butte area. Attendees said that they felt their concerns over closure of roads and trails had not been heard in the past and voiced that the new plan should take their comments and concerns into consideration. Re-opening closed areas for OHV use was strongly suggested, as well as not closing any additional areas. Some comments reflected the need for accommodating disabled and senior citizens. Developing trails for this segment of the population, especially those with OHV access, was suggested.

Other comments received at the Mesquite scoping meeting include the following:

- Maintain multiple use of trails,
- Designate motorized and non-motorized routes,
- Protect cultural and natural resources by additional policing, not closure,
- Local government participation,
- Address economic impacts to local communities and culture,
- Lands and realty actions,
- Identify and reclaim historic trails for their former uses.

**Pahrump (February 8, 2010) - Total Registered Attendance: 28**

Comments from the Pahrump public meeting focused on renewable energy development and coordination with BLM field offices north of the planning area. Other comments encouraged the BLM to work with adjacent BLM field offices during the RMP planning process. Another issue raised was concern over large renewable energy development projects in close proximity to Pahrump that would conflict with recreational uses of these lands, specifically the concern that such developments could preclude recreational OHV opportunities. There were also a few comments made regarding concern for the impact to wild horses from management decisions and the need to create alternatives in the new plan to protect them. There were also a few comments regarding the location and justification for current ACECs.

Other comments received at the Pahrump scoping meeting include the following:

- Preserve undeveloped areas,
- Concerns about impacts to visual resources from solar developments,
- General public scoping and RMP planning process issues.

**Beatty (February 9, 2010) - Total Registered Attendance: 5**

Comments from the Beatty public meeting focused on renewable energy development and coordinating planning efforts with BLM lands north of the planning area. Attendees raised the issue of renewable energy development in close proximity to Beatty being in conflict with recreational uses and the preservation of open space.

**Laughlin (February 10, 2010) - Total Registered Attendance: 8**

Public comments received during the meeting in Laughlin covered various topics, including lands and realty, OHV use, solar and wind development and the scoping process. Comments received regarding solar and wind development requested that these types of development not be located in close proximity to communities. Individuals also stated that energy development projects would have more of an impact on natural resources, when compared to OHV use. There were a few questions regarding the process for land disposal and issuance of ROWs.

**Overton (February 11, 2010) - Total Registered Attendance: 31**

The majority of public comments made during the Overton meeting expressed concern over limited OHV use areas and the potential for solar and wind development on public lands. Attendees expressed frustration over recent closures, particularly those around the Moapa Valley. Re-opening closed areas for OHV use was strongly suggested, as well as not closing any additional areas. Comments regarding solar and wind development expressed concern for damage to natural resources and not being able to use these areas for OHV use if developed.

Other comments received at the Overton scoping meeting include the following:

- Access to public lands,
- Local government and community input into the plan,
- Lands and realty actions,
- Redrawing ACEC boundaries,
- Route designations,
- Traditional uses of public lands for OHV use.

## Written Scoping Comments

In addition to receiving comments from public scoping meetings, the BLM LVFO/PFO solicited written scoping comments. Written comments were accepted throughout the public scoping period. Comments received shortly after the deadline were accepted to accommodate mail delays.

### Method of Submittal

A total of 263 individuals submitted written scoping comments. These comments were accepted via mail, delivered in person and e-mail (Table 5).

**Table 5. Las Vegas/Pahrump RMP/EIS Written Comments: Response Source Enumeration**

Method of Submittal	Responses Received
Mail or Delivered in Person	82
E-Mail	143
Oral	38
<b>Total Responses</b>	<b>263</b>

Responses from multiple authors living at the same address, or multiple authors with no address listed for each author, were coded as a single response. Several responses were received multiple times and/or in multiple formats (e.g., fax and mail). When identical responses were submitted by the same author, the earlier response with the author's signature was retained in the public record.

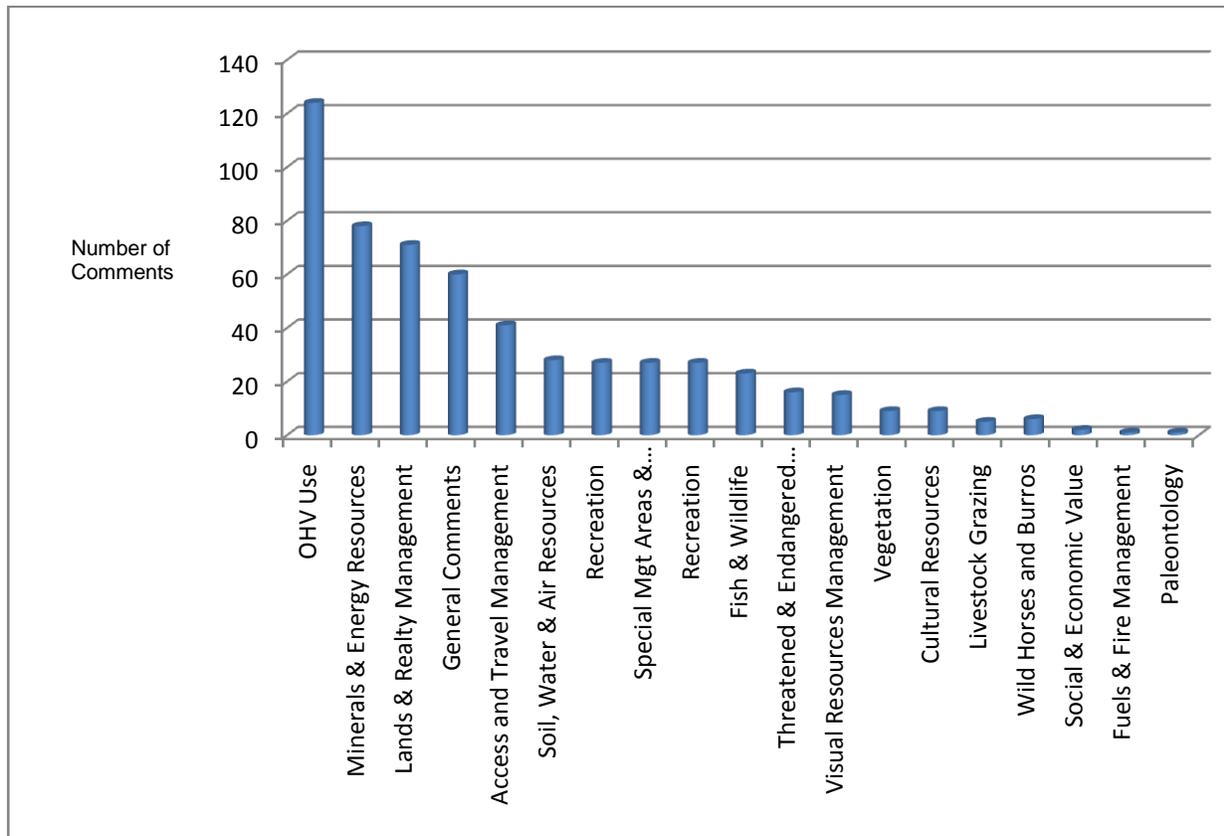
### Number and Type of Comments Received

After the scoping period ended on February 28, 2010, the responses were numbered and entered into a database. Each response was read in its entirety and all distinct comments were recorded and coded for enumeration and analysis. Comments were enumerated using standard database and spreadsheet software.

Individual comments were coded by primary topic, regardless of the position of the comment towards the topic. Several comments addressed more than one comment category, or topic. These comments were coded by the driving topic unless the associated topics were presented, in which case the comment was coded under both comment categories. Examples of this include comments regarding restricting OHVs in lands that are part of proposed wilderness in order to preserve the "wilderness qualities". There are two potential topics presented, with the driving topic being that of preserving "wilderness characteristics". Comments coded as "General" are usually very broad management concepts or very specific issues. The comment analysis process equally considered all written and scoping meeting comments based on the issues raised and information provided.

The following tables and figures (Figure 4 and Table 6) indicate the relative interest of respondents who submitted written comments towards various broad topics in a position-neutral perspective. This enumeration is not intended to show or indicate “weighting” of comment categories or bias towards any issue; it merely indicates the level of interest in various issue areas.

**Figure 4. Written Scoping Comments: Comment Categories Enumeration Graph**



**Table 6. Written Scoping Comments: Comment Categories**

Category	Number of Comments	Percent of Total
Access & Travel Management	41	7.6%
Cultural Resources	9	1.7%
Fish & Wildlife	19	3.5%
Fuels & Fire Management	1	.18%
Lands & Realty Management	71	13.2%
Livestock Grazing	5	.93%
Minerals & Energy Resources	78	14.5%
OHV Use	124	23%
Paleontology	1	.18%
Recreation	27	5%

Category	Number of Comments	Percent of Total
Social & Economic Value	2	.37%
Soil, Water & Air Resources	28	5.2%
Special Management Areas & Wilderness Characteristics	27	5%
Threatened & Endangered Species	16	3%
Vegetation	9	1.7%
Visual Resource Management	15	2.8%
Wild Horses and Burros	6	1.1%
General Comments	58	10.8%
<b>Total</b>	<b>537</b>	<b>100%</b>

As the written comments were analyzed, both by computer comparison and by manual review, two general form letters were identified. These letters represent 17 of the 537 total responses. Identical letters were analyzed as a group. Letters with additional text were reviewed manually to determine whether the additional text identified issues that the form portion of the letter had not already raised. If no new issues were identified, the letter was included in the form letter group. If new issues were identified, the letter was analyzed as an original written comment.

It is important to note that analyzing identical comments as a group does not reduce the importance of the comment. The NEPA regulations on scoping are clear that the scoping process is not a vote, but an opportunity to “determine the scope and the significant issues to be analyzed in depth in the environmental impact statement” as well as to “identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review.” As such, if 90 letters raise the same issue and one letter raises a different issue, both issues must be equally considered in the NEPA document.

## Summary of Written Comments

Prior to coding the written comments, a range of issue areas was developed into which the comments could be organized. Following is a summary of the comments received, organized by comment category.

### Access and Travel Management

Access was defined as motorized vehicle access, including roads, trails, and rights-of-way, although not necessarily including OHV recreation. As routes that provide access to many areas of the planning area also provide opportunities for OHV recreation, several comments could have been coded in either the OHV or Access categories. The issues raised by these comments are identified in Chapters 3 and 4 as appropriate.

Many respondents discussed the concept of a network of roads and trails as part of the issue. Many acknowledged that a system of road and trail designations might be necessary in order to effectively manage transportation in the planning area. Several expressed the need for additional signage and maps indicating which roads were open or closed.

Many respondents described the need to maintain the existing level of motorized road access. Some individuals and organizations felt that additional motorized access was needed in the planning area, while others felt that roads and trails were too pervasive and needed to be limited. One purpose mentioned for keeping roads and trails open to motorized access included the need for equal access to the area for people

of all ages and abilities. This idea was brought forth often as a justification for maintaining and/or expanding the transportation network.

Some individuals disagreed with the open access point of view and called for additional restrictions to motorized access in the planning area. One commenter states: “The BLM should establish a travel system that retains the minimum amount of routes necessary to provide for reasonable access to public lands including closure and rehabilitation of redundant roads, roads that serve no visitor or administrative purpose, and roads in sensitive areas.” These individuals indicated that resource damage was being caused by vehicle access to the planning area and such access needed to be limited using road closures and restrictions. Commenters suggested that an ample or even overabundant amount of road access existed in the planning area and that closures would not significantly affect access. Conversely, some stated that too many roads have been closed, greatly limiting access to public lands, especially lands in close proximity to cities and communities.

Revised Statute (RS) 2477 was raised by several commenters. Revised Statute 2477 contained in the 1866 Mining Law was intended to facilitate settlement of the west by granting the ability for counties and states to assert a “right-of-way for the construction of highways over public lands.” Congress repealed RS-2477 with the enactment of the Federal Land Policy and Management Act (FLPMA) in 1976. Since then, it has been an ongoing issue between the Federal government, counties, and states as to which routes were developed in the west under the RS-2477 authority and thus under the responsibility of the counties. In 1997, Congress directed that the Department of the Interior not issue any new regulations on RS-2477. Several court cases have addressed a variety of legal points concerning resolution of RS-2477 claims. Resolution of RS-2477 assertions is a legal issue beyond the scope of this RMP effort. This RMP may establish management for the transportation system in accordance with existing regulations and policies and with existing available information. Some comments supported treating all routes as RS-2477 ways while others argued that no route should be considered a RS-2477 way. Similar to the summaries above, some individuals asked that the routes be maintained to continue access to the area, such as the following statement: “Keep existing RS-2477 roads open for access to washes.”

### **Cultural Resources**

There were few comments on cultural and historic resources. The broadest mention of these resources was in blanket statements that requested all cultural resources be protected. More specific comments did address these resources and several related issues.

Some commenters requested an inventory of all cultural resources to avoid conflicts with other resource uses. For example: “Consider the effects of all RMP decisions on the wealth of archaeological and cultural values located in the planning area. Since it will be difficult to evaluate the effect of decisions..., the BLM should undertake an archaeological inventory....” A few individuals requested protection of historic sites such as old mines, cabins, settlements, and other features used by pioneers, homesteaders, settlers, and miners. They related the protection of these sites to motorized access so more people could enjoy these resources.

### **Fish and Wildlife**

Comments on wildlife management and other issues associated with non-Federally listed animal species in the planning area were received from many individuals and organizations as well as government agencies. A wide range of issues were addressed in these comments, including the following:

- Wildlife/energy development conflicts
- Loss and modification of water resources

- Wildlife monitoring
- Migration corridors
- Protection of habitat
- Management of multiple uses as it relates to wildlife

Most commenters supported the presence of wildlife in the planning area but suggested different approaches for the BLM to provide suitable habitat. A number of individuals suggested ways that the BLM could improve wildlife habitat with different management actions, better science, and improved communication with the public, user groups, and local government. Some respondents addressed the need to manage for and protect native species.

One of the issues addressed the need to minimize conflict between wildlife and other resources. Many individuals identified renewable energy development as a use that has potential wildlife conflicts. These individuals suggested that the RMP identify ways to limit these impacts through closures or restrictions: “We strongly recommend that BLM exclude from consideration for renewable energy development public lands with...biological resources and values.”

Many comments addressed the BLM administrative and management actions that impact wildlife habitat and wildlife management by other agencies. Individuals stated that consultation with the wildlife agencies should occur early in the process and is necessary to produce comprehensive wildlife plans for all sensitive wildlife species.

### **Lands and Realty Management**

Several lands and realty-related comments were received. Some commenters were against further disposal of public lands within the LVFO/PFO, especially in relation to areas surrounding local communities. There were many who expressed the need for public land around Las Vegas and other communities to be preserved as open space. For example, one respondent wrote, “Stop disposal sale of public land pending planning for a belt of public land around the Vegas Valley being set aside to remain public and undeveloped.” Other respondents encouraged land disposals so that communities can continue to grow. Many suggested that the BLM reevaluate current disposal areas to reflect the current low rate of development for these lands. Others expressed concern over the continuing demand for water on disposed lands, stating that lands should not be considered for disposal without first ascertaining whether sufficient water resources would be available. Some respondents requested specific parcels of land be considered for disposal for specific uses.

A few comments expressed the need for new utility corridors to be identified in the RMP. Others stated that existing corridors need to be widened to accommodate new uses. Conversely, some respondents were against developing new corridors in order to protect natural resources, especially areas adjacent to National Parks.

Many respondents expressed concern over disposing large areas for renewable energy development, especially in close proximity to communities or current OHV areas, while others felt that the demand for renewable energy created a need for additional land disposal areas to meet this demand.

### **Livestock Grazing**

Comments related to livestock grazing expressed concern over trespass by ranchers in areas that have been closed to livestock grazing.

## Minerals and Energy Resources

Comments related to renewable energy development were frequently mentioned. Commenters identified a full range of issues both in support of and against solar and wind energy development. The majority of the energy development comments discussed concern over the loss of huge tracts of land that could otherwise be used for recreation, such as OHV use. Others expressed concern over damage to natural resources from large solar development projects. Proponents of renewable energy development suggested that projects could be located in areas already disturbed or in areas away from communities, however the need for access to transmission corridors was also a concern regarding where projects could be located. Some respondents suggested that criteria be developed for determining where renewable projects could be located and that specific zones be created for solar and wind projects. Criteria suggested included water availability, viewsheds, proximity to communities, proximity to national parks, wildlife habitat and types of solar development technologies that would have the least impact on natural resources. Some commenters explained the need for more stringent reclamation and mitigation standards for all renewable energy development.

## OHV Use

Comments related to OHV use were more numerous than any other comment category. Comments included issues on area and route designations, effects of OHV use on resources and effect of OHV management on OHV use. Other topics addressed include education, enforcement, and special areas managed for OHV use.

OHV access was a recurring theme of many of the comments. Many respondents expressed concern that areas which have long been available for OHV use have recently been closed and should be reopened with this plan. Many were also concerned current levels of OHV access will no longer be available when the RMP is completed. Likewise, several commenters encouraged the BLM to accurately inventory existing routes and use this inventory as a starting point for OHV route designations. Other commenters argued that there are many areas where OHV use should not occur at all and OHV use in these areas should desist.

Another category of comments went beyond activity level concerns and addressed a general need for improved recreation management by the BLM. Some of the topics mentioned in this category were improved education, increased law enforcement, improved signage, and more innovative on-the-ground management. Improved user education was frequently requested. Individuals, organizations, and other government agencies stated that increased user education should be a key component of the RMP. Commenters claimed that education would solve many resource degradation and user conflict problems.

Connected with many of the requests for user education were comments that identified a lack of law enforcement as one of the reasons for cultural resource degradation. A large number of commenters suggested a peer enforcement program using OHV groups and other volunteers to educate users and enforce regulations. These suggestions indicated that this type of program could be an option to establish user group partnerships and increase public participation in BLM planning and implementation processes.

A need for improved signage and maps was another frequently received comment. Users identified the lack of signs on roads and trails as one of the primary causes of resource degradation (e.g., impacts on soils, vegetation, wildlife, cultural resources) in the planning area. Numerous requests were made for the RMP to include the design and implementation of a comprehensive and consistent system of signage for all roads, trails, and other recreation sites. It was suggested such a system should tie in to route designations and route loops. Signage could also incorporate user education in the form of trailhead kiosks and interpretive signs in appropriate locations. Suggestions also stated that route signs and

designations should include types of vehicles permitted and/or restricted in certain areas in order to improve resource protection and decrease user conflict. These individuals assert that a quality map along with enforcement, designations, and signage would minimize future resource damage.

Route designation was addressed in relation to access and recreation. Access related comments indicated a need for general route designation. Recreation comments also expressed a need for specific route and area designations. Some individuals suggested that routes be managed as “open unless signed closed” while others suggest that trails be managed as “closed unless signed open.” The controversy extends to area designations as well.

Further comments included what would or would not be considered “appropriate” for cross-country OHV use. Several specific areas were recommended by some commenters for closure to OHV use and the same areas were recommended by other commenters to remain open to OHV use. The areas vary from Big Dune (in Nye County) and the Jean area in western Clark County and to areas near Searchlight, Pahrump and Mesquite, particularly the Gold Butte area.

### **Paleontology**

Only one comment was categorized under paleontological resources, although other comments broadly included paleontological resources as “sensitive resources.” Comments that were provided refer to protection of non-renewable paleontological resources in the upper Las Vegas Wash.

### **Recreation**

Many different types of recreation activities were identified as important to individuals and organizations. Other comments included discussion on the compatibility of recreation with other resource uses as well as social and ecosystem conditions.

A wide variety of recreational uses were mentioned that could be considered in the RMP. Some respondents dealt with the need for more and improved trail and trail-system opportunities. Individuals identified a lack of use-specific trails such as equestrian or single-track motor vehicle trails. A number of persons indicated that the RMP needed to consider ways to make group recreation permits easier to obtain, with the opportunity for more competitive events with few restrictions, such as restrictions on group size.

Another category of comments went beyond activity level concerns and addressed a general need for improved recreation management by the BLM. Some of the topics mentioned in this category were improved education, expanded law enforcement, better signage, and more innovative on-the-ground management. Improved user education was frequently requested. Individuals, organizations, and other governments stated that increased user education should be a key component of the RMP. Commenters claimed that education would solve many resource degradation and user conflict problems.

Route designation was another item addressed under access and recreation. Access related comments indicated a need for general route designations. Recreation comments also expressed a need for specific route and area designations.

Several respondents expressed concern over conflicts between recreation and energy development, specifically solar and wind. Some areas that have been suggested for solar development are in areas where frequent OHV use occurs. Many expressed the need for a recreation zone around Las Vegas and other communities where land disposal and energy development would either be restricted or not allowed.

Finally, several individuals referred to the potential growth in recreation users and the impact that growth would have on local economies. Many of these people want the BLM to analyze the potential economic impacts of recreation use, inclusive of all recreation uses.

There were very few comments specifically related to special recreation management areas (SRMA), and when there was a comment, it usually referred to a specific piece of land that should receive this designation, such as the Jean and Primm OHV areas. A few of the comments requested that SRMAs should be managed exclusively for recreation, requesting the exclusion of conflicting uses.

### **Social and Economic Value**

There were only two comments regarding social and economic value. These comments expressed the need to analyze impacts to private land owners and growing communities from BLM management decisions.

### **Soil, Water and Air Resources, including Water and Air Quality**

Comments regarding soil, air and water quality were mentioned, both as part of other issues, and as a separate resource management issue. The majority of comments expressed concern over limited water resources on public lands and the need to determine the availability of water before public land is disposed or leased to energy developments and other uses that would require water. Water conservation and protection of water resources, such as springs and wells, was mentioned by many respondents who were concerned with the lack of water resources, both for human consumption and for ecological functioning.

There were comments concerning airsheds within and around Las Vegas. Individuals encouraged restrictions to energy development and OHV use in order to preserve the air quality in these areas. Climate change, as it relates to air and water, was also mentioned as an issue that the new RMP should address.

### **Special Management Areas and Wilderness Characteristics**

Several respondents raised concerns related to designation and management of ACECs, wild and scenic rivers and wilderness areas. Some respondents stated that existing ACECs be maintained and new areas for ACECs be considered to protect desert tortoise habitat as well as other sensitive species or rare plants. However, some commenters stated that the new plan should not designate any new ACECs because they felt such designations are too restrictive on other uses. There were a few comments regarding the need for allowing ROWs within ACECs, specifically site type ROWs for communication towers. Some commenters proposed specific locations for new ACECs in areas they feel are in need of additional protections.

Several comments addressed management of wilderness and lands considered to have “wilderness characteristics”. In some cases, individuals indicated a desire for the RMP to consider protecting lands perceived as containing “wilderness characteristics.” A few comments identified specific areas and encouraged specific management to protect “wilderness qualities” in these areas. Conversely, many individuals opposed special management of areas with “wilderness characteristics” on non-wilderness study areas (WSA) or Congressionally designated wilderness areas.

Wild and Scenic Rivers were also mentioned in the comments received. Most commenters expressed a desire for BLM to consider various river segments within the planning area for eligibility and suitability for designation, such as the Virgin River.

## Threatened and Endangered Species

Many individuals requested that all Special Status Species in the planning area be given substantial management attention in the RMP. Most of these expressed a desire for the new RMP to protect habitat for threatened and endangered species, such as the Desert Tortoise. For example, one respondent wrote “We urge BLM to strengthen public land habitat protection for all Special Status Species throughout their natural ranges and to clearly demonstrate such protection goals, objectives and strategies in a manner that the general public can readily comprehend.” Some of these commenters also expressed a concern for renewable energy development in areas where special status species may occur or that such development in close proximity to sensitive habitat could reduce water resources necessary to sustain such plant and animal communities. One such area mentioned was the Amargosa Valley where declining water levels at Devils Hole could have an impact on the Devils Hole pupfish.

There were some individuals who felt that specific areas currently under protection for sensitive plant species, such as Big Dune (in Nye County), do not need further protection and should be removed from such protection, especially with respect to OHV use in this area.

## Vegetation

Vegetation comments can be found both under this heading as well as the Threatened and Endangered Species section. The few comments received regarding vegetation express concern over the need for exotic and invasive species management as well as protection for large expanses of creosote-bursage scrub and mesquite woodland communities.

## Visual Resource Management (VRM)

Several individuals commented specifically on visual resource issues. Most respondents proposed VRM designations in relation to preserving visibility adjacent to National Park Service (NPS) lands, wilderness areas and adjacent to communities, such as Searchlight and Mesquite. Many recommended that VRM designations which preserve the landscape should be associated with restrictive management for renewable energy development and OHV use.

A unique aspect of visual resource management raised by some commenters was the issue of night skies. Commenters encouraged BLM to consider “lightscape management” when considering visual resource management, including restrictions on lighted energy development facilities.

## Wild Horses and Burros

Comments received regarding wild horses and burros stated that the BLM should not remove them from public lands, and in some cases, they should be returned to public lands where they had previously been removed. Others requested that alternatives developed for the new RMP consider impacts to wild horses and burros and adequately analyze the alternatives in the EIS for the plan. Some comments requested that detailed boundaries of wild horse herd management areas be provided to the public so that informed comments can be submitted to the BLM. One individual stated, “Scientific modeling should be used to determine the “carrying capacity” of the region under limited groundwater constraints” and that the BLM should “Determine the maximum wild horse and burro populations, and the lack of predation that this region can support within locally available water resources and native species demands.” Another individual suggested that the BLM re-evaluate specific herd management boundaries and areas.

Most commenters advocated protection of wild horses and burros while some suggested specific management actions, such as designing water developments, in order to support wild horse populations

and reduce conflicts with other species and resource uses. Public scoping identified several wild horse and burro issues to be specifically considered during the RMP Revision.

### General Comments

Many of the comments received addressed ways in which the BLM might improve some of the practices it uses in the administration of the RMP process. Others discussed ways in which the BLM might improve general agency management and interagency cooperation, or work with other organizations. Comments of this nature were categorized as general. There were several comments regarding the need for a “user-friendly” and “easy-to-read” RMP. There were a few respondents who questioned the need for a new RMP at this time, stating that there have not been enough changes in policy or changes in circumstances to warrant a new plan.

Several individuals discussed the public involvement process. There were suggestions as to which opinions should be included in the planning process. Some felt that only local input should have significant weight, while others argued that opinions should be sought from a nationwide audience. Nearly all of these comments requested improved dissemination of information. Many commenters expressed their desire to be more involved with the planning effort as it progressed.

One of the specific administrative issues identified in several comments was cooperation with adjacent landowners, communities and local governments. The commenters suggested that the BLM make efforts to improve relationships with both private and public landowners in order to improve overall management of the area. Closely tied to this discussion were individuals addressing the need for the BLM to improve its relationships with all local area stakeholders including local governments, non-governmental organizations, interest groups, and private citizens. Many expressed the need for the BLM to adhere to local planning documents and incorporate them into the RMP.

Comments that were categorized as “General” did not have an identifiable theme or covered many different topics. The following are examples of these types of comments:

- Need to retain multiple use management guidelines
- Education of land users
- Enforcement of policies and laws
- Don’t use comments as votes
- Openness during the planning process
- Easy access to all planning documents

Additional comments categorized as “General Comments” are listed in Appendix A.

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## 3.0 ISSUES IDENTIFIED DURING SCOPING

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Scoping is a dynamic process that assists with identifying issues to be addressed in the revision to the Las Vegas Resource Management Plan (RMP) and the associated Environmental Impact Statement (EIS). The Bureau of Land Management's (BLM) planning handbook defines planning issues as disputes or controversies about existing and potential land and resource allocations, levels of resource use, production, and related management practices. Issues include resource use, development, and protection opportunities for consideration in the preparation of the RMP.

For this process, each issue was developed as a position-neutral statement or question that sets the groundwork for development of alternative solutions to be analyzed in the EIS. To generate the issues from public comments, each public comment was analyzed and key points summarized. Chapter 2 contains a general summary and individual key points can be found in Appendix B. For each comment summary, a position-neutral issue was identified. This process was used for all scoping input. The issues identified from comments at public scoping meetings were added to written public scoping comments, internal BLM scoping, and interagency scoping. The following list is a compilation of all scoping issues raised to this point in the process. Since the scoping process is dynamic and continual, scoping issues are subject to change throughout the planning process as new conditions and/or information are identified. Issues are organized by comment category, with issues and sub-issues listed as brief, numbered list items:

### Access and Travel Management

- 1) How can energy development be allowed while limiting the effects of such development on other uses (e.g., restricting access along existing roads, requiring new roads if existing roads are closed because of development)?

### Cultural Resources

- 1) What management practices and/or restrictions are needed to protect cultural resources (e.g., avoidance areas to protect sensitive sites, route designation)?
- 2) What management is needed to protect cultural sites that are easily accessible by off-highway vehicles (OHV), and/or are particularly susceptible to looting or vandalism due to easy public access?
- 3) How will cultural resource sites be managed to address their scientific, traditional, educational, public and research values?
- 4) Where are inventories necessary to support the future decision-making processes and cultural resources management?
- 5) How will the RMP Revision examine the success of past practices of site protection (e.g., site stewardship) to determine if current measures should be modified or additional measures need to be developed and implemented?

### Fire and Fuels Management

- 1) BLM fire management policies have been revised since completion of the existing RMP. How does the RMP fire management section need to be revised to be consistent with the new policy (e.g., add direction on Wildland Fire Use and Appropriate Management Response)?
- 2) Are there areas where wildland fire could be used to meet resource objectives?
- 3) What objectives are needed to be consistent with adjacent land management agencies (e.g., Lake Mead) and minimize fire in sensitive areas (e.g., desert tortoise habitat)?

- 4) What types of fire prevention and rehabilitation methods are needed to maintain or improve public lands?

## Fish and Wildlife

- 1) How will the Nevada Wildlife Action Plan be incorporated into the RMP Revision? More broadly, how will the state's role in managing fish and wildlife be acknowledged and integrated into the RMP Revision?
- 2) What species and habitats should be considered as priorities for management? Suggestions included:
  - a. desert bighorn sheep (need for water developments, as well as reducing habitat loss, fragmentation, or direct impacts to sheep populations),
  - b. raptors (specifically protecting nesting and foraging habitats),
  - c. mule deer.
- 3) What are desired fish and wildlife population and habitat conditions (e.g., population management objectives, conservation targets and thresholds)?
- 4) What specific management actions (prescriptions, restrictions, and/or mitigations) are needed to support a variety of game, non-game, and migratory bird species, and specifically to meet desired conditions for priority species/habitats?
- 5) How will habitat fragmentation be analyzed? What tools or methodologies will be used to analyze habitat fragmentation?
- 6) What management actions could protect wildlife, specifically birds, from wind energy development (e.g., incidental strikes)?
- 7) Will habitat improvement and enhancements, such as maintaining developed water holes, be considered in the RMP Revision, especially within the Gold Butte Area?
- 8) What management is needed to protect wildlife core areas, buffer areas and connecting corridors to give plant and animal species the space to move within (migration corridors) and between (genetic flow) habitats and for populations to intermingle, maintain genetic viability, and adapt as the climate changes? Should habitat connectivity include occupied habitat conforming to the recently developed habitat model by the U.S. Geological Survey, or narrow "corridors" of habitat linking known populations, or a combination?
- 9) What restrictions on water resources are necessary to protect sensitive fish and wildlife habitat?

## Lands and Realty Management

- 1) What areas should not be available for construction of site-type rights-of-way (ROW) (e.g., cell towers, communication towers)? Suggestions included:
  - a. close to Northshore Road,
  - b. close to Muddy Mountain Wilderness,
  - c. should areas of critical environmental concern (ACEC) still be exclusion areas for site-type ROWs, but not linear ROWs?
- 2) Are existing linear ROW corridors sufficient to meet current and anticipated demand?
  - a. Is the alignment and management of existing ROW corridors sufficient to balance transmission while protecting resource values? Suggestions included:
    - i. Could the ROW corridor through the Sunrise Mountain Instant Study Area (ISA) be expanded to 3,500 feet?
    - ii. Could a new corridor be identified that avoids the Sunrise Mountain ISA, avoiding the issue of the narrowing of the corridor?

- iii. Could the utility corridor currently designated to run through the south end of the Indian Springs community be moved to a more suitable location such as south of Grandpa Mountain (the route for the Valley Electric power line)?
  - iv. Could the 368 corridor be modified to allow for transportation ROWs that accommodate utilities and transportation infrastructure, including future roads, fiber optic and other communication, pipelines, and power transmission?
  - b. Are there areas where additional linear ROW corridors are needed?
  - c. Where could corridors be needed to accommodate potential future solar and wind energy developments (whether on private or public lands) to allow for the transportation of the produced energy?
  - d. How will the results of the Westwide Energy Corridor Environmental Impact Statement (EIS) be incorporated into the RMP Revision? Segment #39-113 of the Westwide Energy Corridor EIS infers the corridor crosses the Valley of Fire State Park. Could a new overhead corridor be designated to the north, avoiding the State Park?
  - e. What level of corridor planning is required where the Westwide Energy Corridor EIS left gaps?
  - f. Are there areas where linear ROWs should be avoided or precluded?
  - g. Should an existing designated corridor be moved if sensitive species habitat would be threatened (e.g., Amargosa to Roach corridor through Ash Meadows ACEC and habitat for the endangered Spring Loving Century plant)?
  - h. What management should be applied within utility corridors to ensure use of the corridors?
- 3) What standard operating procedures (SOP) and best management practices (BMP) are needed for transmission siting, construction, maintenance, operation and decommissioning of ROWs to ensure consistency with the Revised RMP, the Westwide Energy Corridor Programmatic EIS and adjacent BLM field office RMPs?
- 4) What lands/areas should be available for disposal or retention?
- a. Should existing disposal boundaries be revised to address growth needs and/or management priorities of the various municipalities and agencies, as well as ecologic needs of the resources or resource uses of public lands?
  - b. Will there be a proposal that all public land be retained, with no land sales?
  - c. Are there areas surrounding the Las Vegas valley that should be retained and managed as open space?
  - d. Are there areas that could be acquired to provide specific land use opportunities (e.g., OHV opportunities, trail systems)?
  - e. Should public lands near the Moapa-Glendale-Logandale areas be considered for disposal before the water rights restrictions have been resolved?
  - f. Should land adjacent to the US Energy hazardous waste facility near Beatty be transferred to the State of Nevada so that the facility may be able to expand in the future?
  - g. Could criteria be developed to identify areas for disposal or acquisition? If so, what criteria should be considered? Suggestions included:
    - i. disposal only when population grows or currently undeveloped areas are fully developed,
    - ii. disposal only when water is available to support development,
    - iii. retain lands with sensitive or rare resource values (paleontology; areas identified as important for species in state comprehensive wildlife plans; the Heritage Program's "Scorecard 2006"; Audubon's Important Bird Areas; regional conservation plans; and recovery plan for threatened and endangered species; sensitive species habitats; corridors for species movements;).
- 5) What areas should be available for wind and solar energy development? Suggestions included:
- a. areas associated with projects currently under consideration (e.g., NVN 86300),
  - b. areas with sustainable supplies of water,

- c. areas in proximity to the areas of electricity end-user,
  - d. areas close to existing industrial developments and/or existing power plants,
  - e. areas with a high potential for energy development,
  - f. areas that contain degraded lands and are in close proximity to new transmission corridors.
- 6) What areas should not be available for wind and solar energy development? Suggestions included:
- a. areas with existing mining claims or other commitments/permits for other uses,
  - b. wildlife habitat management areas,
  - c. listed (threatened or endangered), candidate, and other imperiled species (including state sensitive species) and their habitats, including designated and proposed critical habitats and landscape level corridors providing opportunities for natural movement,
  - d. sensitive and rare natural communities,
  - e. zones around known raptor nesting sites adequate to provide protection for essential foraging areas,
  - f. fly-ways, especially for raptors,
  - g. identified wildlife corridors,
  - h. areas as established in state comprehensive wildlife plans, the Heritage Program's "Scorecard 2006", regional conservation plans, and recovery plan for threatened and endangered species,
  - i. steep slopes in order to reduce erosion impacts,
  - j. upland habitat located within two miles of any seep, spring, stream, or wetland,
  - k. local, state, or federally protected lands,
  - l. National Landscape Conservation System (NLCS) lands (national conservation areas, national monuments, wilderness areas, wilderness study areas (WSAs), wild and scenic rivers, and national historic and scenic trails),
  - m. ACEC,
  - n. Desert Wildlife Management Areas,
  - o. areas with wilderness characteristics, including citizen-proposed wilderness areas,
  - p. Special recreation management areas (SRMA),
  - q. visually sensitive areas,
  - r. solar thermal power plants should be sited at least 50 miles from any residences,
  - s. on the Moapa Valley floor (including Overton and Logandale) or within the viewshed of the valley, including any visible from the Valley floor up on the edge of the mesa,
  - t. Lower Mormon Mesa,
  - u. Flat Top Mesa,
  - v. near (in close proximity) Jean or Searchlight,
  - w. around Henderson,
  - x. 40-Mile Wash (in Nye County),
  - y. those areas that are within over appropriated or fully appropriated groundwater basins (as determined by information on existing water use and permitting),
  - z. in locations where water use for solar energy developments would threaten sensitive areas (e.g., areas near Death Valley National Park, Ash Meadows National Wildlife Refuge {NWR}, Desert NWR, Pahrangat NWR and Moapa Valley NWR) or federal reserved water rights,
  - aa. any area outside the designated zones.
- 7) What stipulations/mitigations could be applied/required in areas where available for wind and solar energy development? Suggestions included:
- a. Should stipulations be required of potential solar developments that minimize consumptive water use (similar to that of California Energy Commission regarding the use of fresh water for power plant cooling)?
  - b. Should areas for development be concentrated rather than dispersed?

- c. Should solar development be restricted (planning area wide or in specific areas) to those types/technologies that limit water use (e.g., dry cooling, PV and parabolic dish engine/Stirling systems which use negligible amount of water: 5-30 gal/MWh, compared to water-cooled technology)?
  - d. Could alternative water supplies (e.g., treated wastewater) be used for solar developments to avoid the use of fresh water sources?
  - e. Should stipulations restrict the use of mass grading and/or vegetative clearing from the solar/wind development project site?
  - f. How will perching by raptors on development infrastructure be discouraged?
  - g. How will conservation priorities of existing land management and conservation plans be incorporated into the stipulations?
  - h. How will impacts from on-going maintenance of pipelines, transmission lines, or distribution facilities be minimized?
  - i. What reclamation standards should be applied, and at what point of the project should they be applied?
  - j. Should off-site mitigation be considered as part of the reclamation/mitigation strategies? If so, what directions or limitations would be needed for an off-site mitigation effort?
- 8) How will ROW avoidance/exclusion areas effect the potential development of solar and wind energy development?
  - 9) What level of protection for environmentally sensitive acquired lands is provided if the lands are not part of an ACEC?
  - 10) Should a decision be crafted to incorporate acquired lands into a currently designated ACEC?
  - 11) How will areas associated with the Southern Nevada Supplemental Airport (SNSA) be managed to avoid conflicts between land uses?
  - 12) Could lands within the disposal boundaries be considered for renewable energy development?
  - 13) Should lands for use in renewable energy production be disposed of rather than leased?
  - 14) Will the RMP identify the ultimate managing entity and approved land uses, and management strategies that address public health and safety issues within the Upper Las Vegas Wash Conservation Transfer Area (CTA)?
  - 15) Should adjusting the CTA boundaries be considered?

## Livestock Grazing

- 1) Are there areas or circumstances where controlled livestock grazing could be considered for weed control, on a very limited basis?
- 2) How will livestock grazing in the Gold Butte region be managed under the RMP Revision?
- 3) How should livestock grazing on allotments purchased and terminated pursuant to the Clark County Desert Conservation Plan and Multiple Species Habitat Conservation Plan (MSHCP) be managed?

## Minerals and Energy Resources

- 1) Where is development and extraction of oil and gas appropriate and what types of stipulations/mitigations/reclamations are necessary in these areas?
- 2) Are there some lands that could be opened to surface disturbing activities where sensitive resources could be protected with less restrictive management (specific resource protections rather than blanket no surface occupancy (NSO))?
- 3) How should oil and gas exploration be managed (e.g., limiting to designated routes, allowed/precluded in NSO, complying with oil and gas area designations, other stipulations)?

- 4) How should minerals in areas of split estate (BLM managed minerals, non-BLM surface) be managed?
- 5) Should areas that have been recently withdrawn from mineral leasing also be closed to other types of mineral development (consistency in management)?
- 6) Where is development of saleable minerals appropriate and what stipulations are necessary in those areas?

## OHV Use

- 1) Where should OHV use be authorized for cross country travel? Suggestions included:
  - a. Nellis Dunes (both existing and potentially expanded to include areas between the Moapa Valley Indian Reservation, Lake Mead National Recreation Area (NRA), and Interstate-15),
  - d. Motorcycle Racing Association of Nevada (MRAN) pit in Jean,
  - e. Jean Lake/Roach Lake SRMA (although the area is currently critical habitat),
  - f. Big Dunes SRMA,
  - g. Nelson Hills (between Nelson and US95),
  - h. areas around Laughlin, Searchlight, Las Vegas, Pahrump, and other communities,
  - i. in the dunes north of the reservoir,
- 2) Where should OHV use be limited (designated routes, temporally/seasonally, vehicle types, etc.)? Suggestions included:
  - a. in and around mesquite woodlands,
  - b. Logandale Trails area,
  - c. Gold Butte area.
- 3) Could the RMP Revision address opening previously closed areas to OHV use (e.g., Hell's Kitchen, Tram Mine, Bitter Spring Creek Wash, and the Sand Dunes)?
- 4) Where should OHV use not be authorized (closed)?
  - a. Are there areas where a well-designed trail system could be used to provide a variety of on-trail OHV opportunities while avoiding sensitive resources rather than closing an entire area to OHV use?
  - b. Are there areas where expansion of OHV restricted areas could be needed to protect natural resources (e.g., Big Dunes to protect Giuliani's dune scarab and Large aegialian scarab)?
  - c. Does the RMP Revision need to officially close, or recognize as closed, wilderness areas that have been designated since completion of the existing RMP?
  - d. Does the RMP Revision need to officially close, or recognize as closed, the OHV closure of the Las Vegas Valley? What process was used for this closure, and how does it need to be addressed in the Revision to ensure consistency? Does the RMP need to maintain the use of designated routes in the Las Vegas Valley, as existing maps at the District Office note that the "closure designation applies to public lands only except for designated roads?"
  - e. Should OHV use be allowed in areas where such activity will affect the air quality in neighboring residential areas, impact rare or unusual land formations and nearby wilderness or related designated areas?
- 5) How should OHV use in washes be managed? Should washes be included in the "limited to designated roads and trails" category?
- 6) How will demand for renewable energy development areas be balanced with demand for and historic use of the area for OHV recreation (areas and trails)?
  - a. Can the RMP Revision compensate OHV users for opportunities (trails or areas) that are lost to wilderness and ACEC designations or renewable energy development (i.e., "no net loss")?
- 7) How/where should areas/routes be designated for competitive events/off-road racing?
  - a. Could previously disturbed areas be designated for continued OHV racing?

- b. What limitations should be considered to protect sensitive resources in areas designated for competitive OHV events, while still allowing for such use (e.g., number of events allowed in a given area in a given year/time period, identification of the number of participants in each event, speed limits, inventories/clearances)?
  - c. Should restrictions on competitive events be specific to types of OHV (e.g., modified 4WD vehicles, four-wheelers, motorcycles)? Do impacts from each type of OHV vary, therefore requiring OHV-type specific restrictions or closures?
  - d. In addition to the competitive event area, where should support areas be identified for competitive events, including areas identified to function as a staging/pit area, areas for camping, etc.?
- 8) What management is needed to protect sensitive resources while providing opportunities for OHV use associated with non-speed commercial events (e.g., seasonal closure to racing, area closures, allowing use in areas currently closed during seasons where sensitive resources aren't active)?
  - 9) Are there areas that could be managed specifically for recreational OHV use (such as new SRMAs), where use conflicts would be resolved in favor of motorized recreation opportunities and analyses of OHV impacts could be conducted up front, reducing the need for detailed analysis at the permitting phase? Suggestions included Laughlin, Nelson Hills, Jean NV, Muddy Mountains, Cold Creek, Searchlight and Mercury areas that have established sustainable trails.
  - 10) How will rock crawling be managed? Are there specific routes, areas, and/or policies that could be included in the RMP Revision to address opportunities for such use?

## Paleontology

- 1) How will the BLM protect paleontological resources at the Upper Las Vegas Wash, as well as any other paleontological sites within the planning area?

## Recreation

- 1) How will demands for increasing and diverse recreation opportunities be met while providing for quality recreation experiences and associated benefits while limiting conflicts between user groups, other land uses, and/or sensitive resources? Should the RMP consider different levels of use than currently mandated?
- 2) What areas require enhanced or special management for recreational uses or for protection of recreational related values (i.e. special recreation management areas and associated prescriptions)? General suggestions included areas that provide opportunities for non-motorized or quiet recreational experiences, as well as areas for OHV recreation.
- 3) Is current management appropriate in currently designated SRMAs?
- 4) What development is required to support/provide for recreation use (e.g., trailheads, campgrounds, restrooms, kiosks, fences, staging areas, other amenities)?
- 5) To what degree should recreational developments be allowed or restricted on public lands?
- 6) How should special recreation permits be managed?
  - a. What size of user group should be required to obtain a permit (size threshold for mini groups)?
  - b. Should the location of a recreational activity determine if or what type of permit should be required?
- 7) How should recreation conflicts between user groups be minimized?
  - a. Should users be segregated to using different places?
  - b. Should users be segregated to using the same place/trail at different times?

- c. How could user education programs (trail signage, kiosks, etc.) be used to reduce conflicts between user groups?
- 8) Should all public land users be required to stay on developed trails (hikers, equestrian, mountain bikers, OHV, etc.)?
- 9) Could areas be set aside near population centers for recreation purposes with other uses further out?
- 10) Are there areas that could be designated for the maintenance of existing shooting ranges and the development of new ranges?
- 11) What type of interpretive/environmental education infrastructure and themes should be addressed? How could these be used to provide information about the area, improve user knowledge, and better protect users and sensitive and unique resources?
- 12) Should old mines and caves be closed to the public?

## **Social and Economic Values**

- 1) How will socioeconomic impacts be addressed in the plan?
- 2) How do plan decisions affect the local economy (e.g., restrictions on existing uses that provide economic benefit, restrictions on potential uses that could provide economic benefit)?
- 3) What are the impacts to limited existing energy transportation infrastructure from potential renewable energy developments?
- 4) How do plan decisions affect the historic/traditional uses or the areas in which they occur?
- 5) How will social benefits of recreational activities (e.g., OHV riding, hiking) be identified and compared to fiscal and social impacts of competing uses?
- 6) How will the RMP decisions affect neighboring property owners?

## **Soil, Water, and Air Resources, including Water and Air Quality**

- 1) What soils/soil types may require special management? What management criteria are necessary for actions allowed within fragile soil areas.
- 2) What measures, including filing for water rights under applicable state or Federal permit procedures, are needed to ensure water availability for multiple use management and functioning, healthy riparian and upland systems?
- 3) Should the amount of groundwater available be considered in the decisions made in the RMP Revision (e.g., avoiding renewable energy development in areas where there is insufficient surface/ground water available to support such development, precluding disposal of public lands if development of those lands is not sustainable given the amount of water available)?
- 4) How will water quantity and quality be protected and ensured for sensitive areas and resources in the face of developments that required heavy water use (e.g., types of solar developments, geothermal developments)?
- 5) Should springs receive special management, specifically to protect existing developments while providing for specific management to improve and protect the water resource?
- 6) What use restrictions or other protective measures are needed to meet Tribal, state, and local water quality requirements?
- 7) What areas should be available for the development of water resources, including ACECs, and the supporting infrastructure such developments require?
- 8) The protective buffer area around natural and artificial waters is inconsistent in the existing RMP. How should this management be made consistent through all resources, including those that can impact riparian areas, while providing for protection of riparian areas.

- 9) What restrictions need to be applied to direct or authorized emission-generating activities for compliance with air quality standards (e.g., Clean Air Act, State Implementation Plans, Applicable National Ambient Air Quality Standards)?
- 10) What management is needed to limit the generation of dust due to activities on public lands or permitted by the BLM (e.g., removal of vegetation and topsoil associated with renewable energy development, OHV use)?
- 11) How will climate change be incorporated into the RMP Revision (e.g., special management to protect species particularly threatened by the results of climate change, analysis of impacts from climate change when combined with the various alternatives on all resources and uses {including water quantity})?

## Special Management Area and Wilderness Characteristics

- 1) Are there river segments that are eligible for Wild and Scenic River designation (e.g., Virgin River)?
- 2) Which eligible river segments are suitable for Wild and Scenic River designation?
- 3) How will outstandingly remarkable values of river segments suitable for Wild and Scenic River designations be protected?
- 4) Will existing ACECs be re-evaluated to determine:
  - a. if the various values and resources still meet the relevance and importance criteria?
  - b. the effectiveness of existing management to protect and prevent irreparable damage? and
  - c. if the existing designation, boundaries, and management adequately reflect any new information that has been collected since the previous RMP, as well as changes in the uses and threats to the relevant and important values?
- 5) Are there ACEC nominations that meet regulatory and policy requirements for relevant and important values? Suggestions included:
  - a. sites identified by the Nevada Natural Heritage Program as being “high priority conservation sites,”
  - b. Eastern Ivanpah Valley (proposed to be added to the existing Paiute-Eldorado ACEC),
  - c. Upper Las Vegas Wash area,
  - d. Apex area,
  - e. Big/Lava Dunes area,
  - f. Pahrump Valley,
  - g. Toquop Wash area,
  - h. Ivanpah Valley/Hidden Valley/Jean Lake/Roach Lake,
  - i. areas with mesquite/catclaw woodlands,
  - j. areas with significant mesquite woodlands,
  - k. Oasis Valley,
  - l. Bearpoppy habitat in Lovell Wash (Muddy Mountains),
  - m. Bitter Springs area,
  - n. lands associated with the Large Scale Translocation Site (proposed to be added to the existing Desert Tortoise ACEC),
  - o. areas that correspond with designated critical habitat for the desert tortoise (proposed to adjust the existing desert tortoise ACECs),
  - p. areas designated specifically to protect competitive OHV opportunities (specifically, Jean Dry Lake Valley, Nelson Hills, and Nellis Dunes surrounding areas).
- 6) What special management is required to protect and prevent irreparable damage to evaluated relevant and important values within potential ACECs?
- 7) What stipulations are needed on site-type rights-of-way within desert tortoise conservation and recovery areas, specifically within the Eldorado ACEC?

- 8) How will boundary and management inconsistencies among overlapping ACECs and other special designations be resolved/addressed?
- 9) How will non-WSA (or designated wilderness) lands with wilderness characteristics, including former WSAs that have been released from WSA designation, be inventoried and considered for management in the RMP Revision?
- 10) How should the segments of the Old Spanish Trail National Historic Trail be managed?
- 11) How should current WSAs be managed if released by Congress?

## Threatened and Endangered Species

- 1) What management is needed to protect special status species (e.g., federally listed, BLM sensitive, or state listed) and their habitat(s)? Suggestions included:
  - a. closures to specific uses,
  - b. seasonal closures to some or all uses,
  - c. area designations,
  - d. inventories/monitoring.
- 2) What management is necessary to avoid the need for federal listing of currently unlisted fish, wildlife, and plant species?
- 3) What management from existing plans (e.g., recovery plans, conservation strategies) should be included in the RMP alternatives?
- 4) Are existing desert tortoise management actions, restrictions, and designations sufficient to provide for protection and recovery of the species? Based on monitoring, are changes to existing desert tortoise management necessary?
- 5) Could an acreage threshold of disturbance in desert tortoise ACECs be considered to ensure the habitat is adequate for desert tortoise recover?
- 6) What management should be applied to desert tortoise populations that are outside designated ACECs, specifically including habitat linkages?
- 7) What types of information (e.g., maps, tables, summaries of monitoring and research, current population and habitat status, population trends) and at what levels of detail should special status species information be included in the EIS?
- 8) What management is needed on specific land uses that could result in high levels of water use in areas where water table levels are imperative for special status species (e.g., solar development in the Amargosa Valley and its potential to effect water levels at Devil's Hole and the Devil's Hole pupfish)?

## Vegetation

- 1) What is the desired vegetative condition, including the desired mix of vegetative types, structural states, and landscape functions, and what actions or use restrictions are needed to achieve the desired condition?
- 2) Are there vegetation types that should be considered priority plant species, such as mesquite woodlands, and how should these be managed to achieve desired vegetative conditions?
- 3) What restoration/rehabilitation methods, techniques, or BMPs are needed for properly functioning ecosystems? Have some currently applied been more/less successful? How can future efforts be improved based on what has been learned from past efforts?
- 4) What criteria are needed to manage noxious weeds and non-native invasive species? Are there specific areas or species which should be the focus for treatments (e.g., tamarisk along the Muddy River to Interstate-15 and along the Virgin River)?
- 5) What management is needed to reduce the introduction and spread of noxious weeds? What types of weed/invasive species control methods are needed to maintain or improve public lands?

## Visual Resource Management

- 1) Are changes in the existing visual resource management (VRM) classes needed based on the inventory of visual resources?
- 2) Are there areas where the VRM class should be increased (made less restrictive) compared to the visual resources inventory due to considerations to manage for specific uses? Suggestions included:
  - a. designated ROW corridors,
  - b. potential ROW corridors,
  - c. existing linear ROWs,
  - d. areas of potential renewable energy development,
  - e. Ivanpah Valley, to support Congressional directives to construct and operate a commercial service airport,
  - f. areas of high OHV use.
- 3) Are there areas where the VRM class should be decreased (made more restrictive) compared to the visual resources inventory due to considerations to protect an area's scenic aspects not captured in the inventory? Suggestions included:
  - a. lands adjacent to Lake Mead NRA,
  - b. lands adjacent to Death Valley National Park (specifically in the Amargosa Desert, between the Funeral Mountains and the Amargosa River),
  - c. lands adjacent to designated wilderness areas,
  - d. within the viewsheds of towns within Moapa Valley,
  - e. within the viewsheds of the roads that lead into Moapa Valley from Interstate-15,
  - f. lands adjacent to Lake Mohave,
  - g. Spirit Mountain,
  - h. other scenic mountain ranges.
- 4) How will the visual impact of wind and solar developments be managed in areas that are visually sensitive? Could they be located in areas that are not visually apparent?
- 5) How will VRM designations address/protect the vast undeveloped nature of the desert?
- 6) How should lightscape (light pollution) be managed (e.g., conditions of approval or best management practices to include light shields or other restrictions on lighting, consideration of impacts to plants and animals from artificial lighting)?
- 7) How will wind turbines and solar developments impact visual resources?

## Wild Horses and Burros

- 1) What areas should be established as Herd Management Areas (HMA), with boundaries sized appropriately for the long term management of wild horses and/or burros (in other words, with sufficient forage and habitat to support self-sustaining genetically viable herds)?
  - a. Should an HMA be established in the Muddy Mountains Herd Area?
  - b. Should an HMA be established in the El Dorado Herd Area?
  - c. Should wild horses and burros be returned to southern Nye County?
- 2) What is the wild horse/burro herd size that could be managed while still preserving and maintaining a thriving natural ecological balance and multiple-use relationships for that area, specifically accounting for constraints associated with locally available water resources?
- 3) What guidelines and criteria should be used for adjusting herd size (e.g., guidance for gathers, fertility treatments)?
- 4) Existing management is silent on whether the Nevada Wild Horse Range (NWHR) should be managed to include wild burros. Should wild burro management be included as part of the NWHR?

- 5) Are current core management areas in the NWHR where the management emphasis should be?
- 6) Are there mitigation measures that could be implemented to increase water availability?
- 7) What stipulations are necessary to protect wild horses and burros from other uses, such as renewable energy development projects, that could impact the thriving natural ecological balance or their wild and free-roaming nature?
- 8) Are there land transfers with the National Park Service (NPS) and U.S. Forest Service (USFS) that could result in an increase in critical habitat components on BLM administered lands?

## General Comments

- 1) How should the various resources on and uses of public lands be managed to achieve the legally required standard of multiple use while protecting the resources and values present on public lands?
- 2) Could zoning (separating conflicting uses and resources) be used to separate public land uses that may be incompatible with resource protection objectives? This could be applied in areas where there are high value resources.
- 3) Does the Airport Environs Overlay District require special management or designation?
- 4) How will natural systems be planned for, rather than adherence to artificial geopolitical boundaries? Could a systems approach be used for the planning and analysis of natural systems in the RMP Revision?
- 5) How can flexibility be built into the RMP decisions (e.g., adaptive management, desired future conditions)?
- 6) What monitoring will be necessary to ensure the RMP decisions are having the desired effects on public land resources and uses?
- 7) How will management from local plans be applied and incorporated into the RMP Revision (e.g., Moapa Valley's Essential Rural Conservation Components, Moapa Valley Open Space Study [December 2009], Moapa Valley Open Space and Trails Plan, Amargosa Valley Area Plan, Pahrump Regional Flood Control Master Plan)?
- 9) How will restrictions on various users throughout the planning area be made consistent (e.g., should areas closed to OHV use for resource concerns also be closed to mineral and renewable energy development for the same concerns)?

## 4.0 ISSUES OUTSIDE THE SCOPE OF THE RMP/EIS

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Several issues raised during scoping are beyond the purpose of the resource management plan (RMP) revision and will not be considered in the environmental impact statement (EIS). There are three justifications for removing these issues from consideration.

- 1) The Bureau of Land Management (BLM) does not have authority to resolve the issue raised.
- 2) The issue is addressed through implementation/site-specific planning actions.
- 3) The issue raised is resolved through law, regulation, Bureau policy or administrative action.

Issues in this chapter are grouped by the appropriate justification, organized by comment category.

### JUSTIFICATION 1

BLM does not have the authority to resolve the issue raised, such as wilderness or wild and scenic river designation. BLM is granted certain authorities through federal law which are implemented by the Code of Federal Regulations (CFR). Issues that fall under this justification are usually resolved through Congressional or Judicial action.

### Access and Travel Management

- 1) How will legal obligations (e.g., RS-2477) in relation to the designation of roads and trails be incorporated into the route designation process? When will the impacts associated with RS-2477 adjudicated roads and trails be addressed?
- 2) How will RS-2477 claims be resolved?

Revised Statute (RS) 2477 contained in the 1866 Mining Law was intended to facilitate settlement of the west by granting the ability for counties and states to assert a “right-of-way for the construction of highways over public lands.” Congress repealed RS-2477 with the enactment of the Federal Land Policy and Management Act (FLPMA) in 1976. Since then, it has been an ongoing issue between the Federal government, counties, and states as to which routes were developed in the west under the RS-2477 authority and thus under the responsibility of the counties. In 1997, Congress directed that the Department of the Interior not issue any new regulations on RS-2477. Several court cases have addressed a variety of legal points concerning resolution of RS-2477 claims. Resolution of RS-2477 assertions is a legal issue beyond the scope of this RMP effort. This RMP may establish management for the transportation system in accordance with existing regulations and policies and with existing available information.

### OHV Use

- 1) How could funding from the off-highway vehicle (OHV) licensing fees be used to improve the OHV trails system?

Licensing fees for OHVs are assessed and collected by the State of Nevada. While monies collected through the licensing of OHVs could be used in for a variety purposes, the BLM lacks the authority to direct the State of Nevada on how those funds should be levied, managed, or spent. As such, this issue is beyond the scope of the decisions that can be made in the RMP Revision.

## Special Management Areas and Wilderness Characteristics

- 1) What areas should be designated as new wilderness study areas (WSAs)?

Some comments raised the issue of designating inventoried areas with wilderness characteristics or areas contained in proposed wilderness legislation as new WSAs. While inventory for these characteristics and management of these lands to protect these characteristics is allowed by FLPMA, as has been held and directed by several judicial decisions, recent court cases have held that designation of new WSAs is not within the BLM's authority. In April 2003, the BLM and the State of Utah reached a settlement to a lawsuit originally brought in 1996 by Utah, challenging BLM's authority to conduct its 1996/1999 inventory and to manage lands as de facto wilderness. One component of the settlement stipulated that BLM lacks authority to designate new WSAs or to manage additional lands under FLPMA's section 603's non-impairment standard. However, it did acknowledge the BLM's authority to inventory public lands and their resources and other values, including wilderness characteristics, and to consider such information in its land use planning under FLPMA. The settlement agreement was revised in September 2005 to remove those provisions that made the original agreement a consent decree. BLM Instruction Memorandum No. 2003-275, notes that the BLM will not designate new WSAs through the land use planning process. A subsequent district court ruling regarding further challenges to the BLM's settlement and associated wilderness policy noted that "FLPMA provides for the establishment and management of WSAs exclusively under section 603," although FLPMA allows that lands could be managed "similar to the non-impairment standard of the IMP," but not as designated WSAs (see *Utah v Norton*, Case No. 2:96-CV-0870). Consistent with this, the Special Management Areas and Wilderness Characteristics #6 of Chapter 3 notes that BLM may manage areas to preserve wilderness characteristics when preparing land use plans.

## JUSTIFICATION 2

The issue raised is best resolved at the implementation level of planning. RMP decisions provide guidance for "future land management actions and subsequent site-specific implementation decisions. These land use plan decisions establish goals and objectives for resource management (desired outcomes) and the measures needed to achieve these goals and objectives, expressed as actions and allowable uses (lands that are open or available for certain uses, including any applicable restrictions, and lands that are closed to certain uses)" (BLM-M-1601 Section II A). As such, some site-specific issues, such as establishing appropriate management levels for wild specific wild horse herd management areas, are not appropriate for the RMP level. For these issues, knowledge of site-specific on-the-ground resource conditions is needed to make an informed decision. Similar issues concerning site-specific resource concerns and conflicts are best answered by site-specific decisions and associated National Environmental Policy Act (NEPA) analysis. Appendix C of the BLM's planning handbook (BLM-H-1601-1) includes descriptions of implementation level decisions for each resource, resource use and special designation. This includes the route designation process associated with comprehensive transportation and travel management. The following list identifies those issues that should be addressed during implementation of the RMP:

## Access and Travel Management

- 1) What roads will be included in the inventory for designation consideration (e.g., RS-2477 routes, previously approved race routes, access routes to existing development, route information provided by user groups)?
- 2) How will roads and trails be managed/designated (open, limited, closed)?

- a. What criteria should be used for route designation (e.g., minimization criteria within the Code of Federal Regulations)? What considerations should be made before closing a route (e.g., discussion about potential uses of a route)?
  - b. Are there places where construction of new roads and trails should be considered for access or resource protection?
  - c. Will a trail/road be designated from Las Vegas to Alamo, NV, to tie into the already established Silver State Trail?
  - d. How will trails and roads with historical significance be managed (e.g., Vegas to Overton Trail, Jean to Searchlight Trail)?
  - e. How will roads and trails in the Gold Butte, Overton arm/northeastern Clark County be managed? Which routes should be managed as open?
  - f. Should roads associated with existing developments (e.g., access and/or maintenance roads for railroads, power lines, or solar/wind projects) be available for public use?
  - g. Should areas away from developed areas/residential areas receive less focus for management of roads and trails?
  - h. What areas could road and trail designation provide and/or improve access to wildlife and/or nature viewing opportunities?
  - i. Are there areas where access to recreational resources can be improved, including development of new roads or improvement/paving of existing roads and trails?
  - j. How will sensitive areas and resources be protected from use along roads and trails?
  - k. Are there areas along the Las Vegas urban wildland interface or OHV closed areas where access to public lands could be opened through designated roads and trails?
  - l. How will impacts from roads and trails across the landscape be addressed?
  - m. Will trails be managed as “open unless signed/mapped as closed”, or “closed unless signed/mapped as open”?
  - n. What speed limits should be applied to the various designated roads and trails? What should the speed limits be in areas where dust control is a problem (e.g., near private residences, solar developments, non-containment areas); should such areas be managed with lower speed limits to reduce dust from OHV use?
  - o. How will closed roads and trails be managed (rehabilitation, restoration, etc.)?
- 3) How will public land access needs of citizens, especially those not fully able, be met (senior citizens, public land users with disabilities, etc.):
    - a. Through trail improvement and development that are easily accessible and with reduced safety hazards?
    - b. Through motorized route designations to provide access to unique areas (e.g., Falling Man Hike, Kirk’s Grotto)?
  - 4) What trail designations are needed to support demand for non-motorized trail-based uses (e.g., equestrian, hiking, mountain biking)?
    - a. Could horseback riding and hiking be allowed in the Amargosa Valley area where OHV use is limited/restricted?
    - b. Increased developed hiking trails to accommodate increases in demand from a growing population (e.g., Kirk’s Grotto in Gold Butte, hiking trails near population centers)?
  - 5) How will County input be incorporated into the route designation process?
  - 6) How will public input/participation be included in and drive the decision-making process for roads and trails?
  - 7) What monitoring is necessary to ensure the designation of roads and trails does not impact sensitive resources (e.g., wilderness, special status species)?

## Cultural Resources

- 1) How will individual cultural resource sites be preserved (e.g., avoidance, mitigation, education, adopt-a-site)?

## Fish and Wildlife

- 1) Have re-numeration fees collected to mitigate for residual impacts to desert tortoise been used effectively to offset impacts that occur on BLM managed lands?

## Lands and Realty Management

- 1) How will existing rights-of-way (ROW) and ROW corridors be managed, including rights of ingress and egress, replacement, upgrade, or reconstruction?

## Minerals and Energy Resources

- 1) How will mutually agreed existing policies relating to the Lone Mountain Community Pit be incorporated into the RMP Revision?

## OHV Use

- 1) Will a comprehensive transportation and travel management plan (i.e., comprehensive trails system with diverse types of OHV opportunities at a variety of difficulty levels) be incorporated into the RMP Revision, including a well-designed trail system could be used to provide a variety of on-trail OHV opportunities (such as the Paiute Trail System in Utah)?
- 2) Where should trail-heads and staging areas be constructed to support designated OHV roads and trails?
- 3) How should OHV user education be implemented to reduce impacts or conflicts (including road and trail signage, mapping, rules, trail rating system, speed limits for dust mitigation, identifying sensitive resources, etc.)?

## Social and Economic Values

- 1) How will the EIS analyze the impacts of potential urban development that is precluded from areas adjacent to existing developed infrastructure?
- 2) How will the alternatives (disposal areas and the availability of water resources) impact whether or not there is sufficient water to support anticipated growth in the area?

## Soil, Water, and Air Resources, including Water and Air Quality

- 1) How much water (quantitative, if possible) is needed to carry out the BLM's mission for all multiple uses (e.g., healthy desert plants, wildlife, wild horses and burros, recreation, renewable energy, dust control practices)?

## Special Management Area and Wilderness Characteristics

- 1) When will implementation plans for each designated area of critical environmental concern (ACEC) be developed?

## Threatened and Endangered Species

- 1) Where should tortoise fences (similar to those seen along Lake Mead) be constructed?
- 2) What recovery plans are currently in place to protect listed plants and animals, and are they being enforced?

## Vegetation

- 1) What organizations and/or agencies (e.g., National Park Service (NPS), U.S. Fish and Wildlife Service (USFWS), U.S. Forest Service (USFS), Clark County, State of Nevada) should be included in weed management and disturbed lands restoration activities?

## Visual Resource Management

- 1) How should visual impacts be decreased from developments on public lands (e.g., use of appropriate lighting, use of proper building materials, colors and site placement that are compatible with the natural environment)?

## Wild Horses and Burros

- 1) How should water developments be designed to avoid conflicts with bighorn sheep?
- 2) How will wild horse and burro water sources be protected (ensuring they are not fenced or access is not otherwise restricted)?

## General Comments

- 1) What management is needed to reduce trash dumping or to clear up dumping sites on public lands?
- 2) Information on the website is not easily accessible. How can information be made accessible and available more easily?
- 3) How should the RMP address enforcement of laws and RMP management direction (e.g., OHV patrols at Logandale trails, other OHV enforcement, education of RMP decisions, reducing target shooting, controlling illegal dumping)?
- 4) Will groups such as non-profits, user groups, and conservation groups be included in the clean-up, upkeep, development, improvement, maintenance, and monitoring of the public lands?

## Mapping

- 1) How will maps and geospatial information be conveyed to the public in a manner that is usable (e.g., can geographic information system {GIS} shapefiles, Google Earth files, files to be loaded into global positioning system {GPS} devices, zoomable PDF files with sufficient detail for use by the public, or other medium be provided to the public)?

## JUSTIFICATION 3

The issue raised is addressed through other policy or administrative action. This includes those actions that are implemented by the BLM as a standard operating procedure, because law or regulation requires them, or because they are BLM policy. For example, issues raised encouraging the BLM to analyze impacts in a certain manner are beyond the scope of the decisions to be made in the RMP. This is because

the NEPA regulations (40 CFR 1500) and BLM NEPA handbook (BLM-H-1790) contain clear directions on how to conduct impact analysis, and at what level of detail. Other examples include instances where rulings in court cases have provided legal direction on the correct interpretation of various laws. Including these types of issues in the RMP Revision would lead the reader to believe that the BLM Las Vegas and Pahrump Field Offices have authority to change law, regulation, or BLM-wide policies, when that is not the case. It is important to clarify that just because an issue is in this category does not mean it will not be addressed in the planning process associated with development of the EIS. Rather, the issue raised does not need to be incorporated into the alternatives development process and range of alternatives because the issue is addressed through conformance to existing policies. The following are examples of these issues raised during the scoping process:

## Access and Travel Management

- 1) What definition of road will be used for designation of roads and trails and impacts assessment?
  - a. How will “user created” routes be addressed in the route designation process?
  - b. How will routes/roads/ways be defined within WSA?

## Cultural Resources

- 1) Where are inventories necessary to support the current decisionmaking processes and ensure accurate impact analysis.

## Lands and Realty Management

- 1) How will coordination of future interstate transmission projects be accomplished among varied landowners and political jurisdictions.
- 2) Could land leases be considered rather than the sale of public lands for community expansion and development?
- 3) How should funds associated with Southern Nevada Public Land Management Act (SNPLMA) be assessed and used?

## Livestock Grazing

- 1) How could livestock grazing trespass, particularly in the Gold Butte area, be addressed and eliminated?

## Minerals and Energy Resources

- 1) What level of NEPA documentation would be required for site-specific (Type I) and project area (Type II) grants for wind testing and monitoring projects proposed outside desert tortoise ACECs (e.g., categorical exclusions, environmental assessments, EISs).
- 2) How should old/abandoned mines be managed?

## OHV Use

- 1) Could the RMP Revision consider mitigation for lost OHV opportunities through use of an OHV Recreation Compensation Fund (e.g., fees collected from projects which impact use areas)?
- 2) How will the cost for competitive events be determined?
- 3) How could the RMP Revision simplify the process and reduce the time it takes to secure a permit for OHV events (of various sizes, commercial/non-commercial, types of events, etc.)?

- 4) How broad of a range of alternatives should the RMP Revision consider (e.g., including both an alternative that restricts OHV use as well as an alternative that expands OHV opportunities)?

## Recreation

- 1) Could the RMP Revision consider performance bonding for special recreation permits (SRP), specifically bonding for large OHV events?

## Soil, Water, and Air Resources, including Water and Air Quality

- 1) What are the rules regarding closing wells (such as Vidler Well) and are they addressed in the RMP?

## Special Management Areas and Wilderness Characteristics

- 1) How should wilderness areas be managed?

## Threatened and Endangered Species

- 1) How will adjustments to the list of listed species (threatened, endangered, candidate) and management to protect and conserve habitat for those species and/or any changes to identified critical habitat be incorporated into the RMP in the future?
- 2) What type of scientific research about the desert tortoise (e.g., responses to disturbance, population levels) will be used to determine/justify appropriate land uses and any potential restrictions?

## Visual Resource Management

- 1) How are viewsheds considered/classified, from either highways or roads/trails?

## General Comments

- 1) How will the state, county, and municipal governments and other agencies be involved in the planning process?
- 2) How will the RMP address NEPA and procedural issues?
  - a. What data should be used to support planning decisions (including scientific background, baseline data, and data quality)? In what manner should data be used? What should be done in the absence of data? What new information/inventories are needed to complete the decisions and analyses of the current EIS process?
  - b. What level of detail should the impact analysis include, and should it be at a consistent level of detail throughout the planning area?
  - c. Which projects should the cumulative impacts address beyond those in the RMP (e.g., Southern Nevada Supplemental Airport, water pipeline developments)?
  - d. How can the public (both local and interest groups) be more involved in the RMP process (e.g., outreach to user groups, email, other electronic media)?
  - e. How will the BLM coordinate with adjacent land managing agencies (adjacent BLM field offices, Lake Mead National Recreation Area, Death Valley National Park, National Forests, etc.) and their management plans?
  - f. Will there be an “environmental baseline” alternative describing the current existing environment against which to evaluate the other alternatives?

- 3) How should the RMP address fee structure (including fee rates, collection, distribution, allocation, prioritization, and fines)?
- 4) Why is the BLM revising the RMP without providing all monitoring information, plan evaluations, and new BLM policies to the public for review prior to any public outreach?
- 5) How will the RMP require that future actions (e.g., land disposals, ROW developments, competitive racing events) undergo environmental analyses so the impacts of disposals on natural and cultural resources are fully considered and avoided?
- 6) How will the various directions from Congress contained in the 2002 Clark County Conservation of Public Land and Natural Resources Act and Southern Nevada Public Land Management Act of 1998 be incorporated into the RMP Revision?
- 7) What management practices for arrival and departure corridors on federal lands near Nellis and Creech Air Force Bases could be implemented based on airspace studies?

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## 5.0 DRAFT PLANNING CRITERIA

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Planning criteria are the constraints or ground rules that guide and direct the development of the resource management plan (RMP), and determine how the planning team approaches development of alternatives and ultimately selects the Preferred Alternative. Planning criteria streamline and simplify the resource management planning actions. Planning criteria ensure that plans are tailored to the identified issues and that unnecessary data collection and analyses are avoided. They focus on the decisions to be made in the plan and achieve the following:

- Provide an early, tentative basis for inventory and data collection needs.
- Enable the managers and staff to develop a preliminary planning base map delineating geographic analysis units.

The preliminary planning issues were included in the Notice of Intent, published in the Federal Register on January 5, 2010. That list was revised based on public and internal input. It is important to note that planning criteria are similar to scoping issues, in that planning criteria can be adjusted throughout the planning process as information and/or conditions change. The draft planning criteria are:

- The planning area is defined as the area covered by the existing Las Vegas Resource Management Plan. The RMP Revision will make planning determinations for public lands within the defined planning area boundary.
- The RMP Revision effort will rely on available inventories of the lands and resources as well as data gathered during the planning process, which will include an updated wilderness characteristics inventory, to reach sound management decisions. Any decisions requiring additional inventories will be deferred until such time as the inventories can be conducted.
- Use and protection of water, water resources, riparian zones, and other related values will be given a high priority.
- Geographic Information Systems and corporate geospatial data will be used to the extent practicable.
- The RMP Revision will be consistent to the maximum extent possible with the plans and management programs of local government, consistent with state and Federal laws and regulations and coordinated with other Federal agencies where appropriate.
- The principles of multiple use and sustained yield will be followed.
- The planning process will involve consultation with Native American Tribal governments.
- The RMP Revision will acknowledge valid existing rights established under the current Las Vegas RMP.
- Federal Geographic Data Committee standards and other applicable Bureau of Land Management (BLM) data standards will be followed.
- Opportunities for public involvement will be encouraged throughout the RMP process.
- Findings and tentative classification of waterways as eligible for inclusion in the National Wild and Scenic River System will follow the criteria contained in 43 CFR 8351.

- The impacts of various proposed land uses on land with wilderness characteristics will be analyzed as part of the RMP process.
- Environmental protection and energy production are desirable and necessary objectives and will not be considered mutually exclusive priorities.
- The plan will be completed in compliance with the Federal Land Policy and Management Act (FLPMA), the National Environmental Policy Act (NEPA), and all other relevant Federal law, Executive orders, and management policies of the BLM.
- Where existing planning decisions are still valid, those decisions may remain unchanged and be incorporated into the Revised RMP.
- The RMP Revision EIS will be developed through the BLM's ePlanning system to the extent consistent with the current functionality of the system and schedule considerations.

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## 6.0 DATA SUMMARY/DATA GAPS

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The *Pre-Plan Analysis for the Las Vegas/Pahrump Field Office Resource Management Plan*, Section D (Data and GIS Needs) contains the data the Bureau of Land Management (BLM) Las Vegas and Pahrump Field Offices (LVFO/PFO) currently has for this planning effort and identifies gaps in the data that may need to be completed for the draft resource management plan (RMP) and environmental impact statement (EIS).

During the scoping period, the public was encouraged to identify issues for the Draft EIS. Additionally, individuals, organizations, and agencies were encouraged to provide the BLM with applicable data that could assist in alternatives development and/or alternatives analysis. Throughout scoping, data gaps were also identified to assist the BLM in obtaining the best available data with which to base decisions. New data and data gaps were required to be identified beyond casual reference. Public comments that simply made statements of preference were not considered new data. As with data gaps, lack of existing data would not halt the planning process. Lack of data must also be at the level of decision-making for this project. As this project is a landscape-level programmatic decision-making document, the absence of site-specific data will likely not impede the ability to develop or analyze reasonable alternatives. With the existence of all data gaps, the BLM will comply with National Environmental Policy Act (NEPA) regulation 40 Code of Federal Regulations (CFR) 1502.22 (Incomplete or Unavailable Information).

Data provided by agencies and organizations during the public scoping period:

- Species list to consider during Section 7 consultation,
- Moapa Valley Open Space Study,
- Habitat Fragmentation Reports,
- Copy of “Sensitivity Based Prioritization for Development Areas Within Renewable Energy Zones”,
- Maps of proposed special management areas,
- Legal Cases and Briefings,
- Copy of “Criteria for Evaluation and Influencing Public Land Management Proposals and Actions within and Adjacent to the Bunkerville Township, Clark County, Nevada” (Bunkerville Town Advisory Board,
- Maps of proposed off-highway vehicle (OHV) use areas,
- Maps of proposed rights-of-ways (ROW),
- Past correspondence between agencies on various issues, such as ROWs and energy development,
- Copies of Memorandum of Understanding (MOU) between the BLM and other agencies,
- Maps of proposed energy corridors,
- Copy of “Moapa Valley’s Essential Rural Conservation Components”,
- Wind development constraints map,
- Copy of “Petition to List Six Sand Dune Beetles Under the US Endangered Species Act”.

Data gaps identified during the public scoping period:

- No additional data gaps were identified beyond those identified in Pre-Plan Analysis for the Las Vegas/Pahrump Field Office Resource Management Plan, Section D.

# 7.0 LAS VEGAS/PAHRUMP RMP/EIS PLANNING SCHEDULE

Data will be collected in preparation for alternatives development. Collected data will be assembled into the Analysis of the Management Situation (AMS). Information in the AMS will be used to generate the existing environment section of the draft environmental impact statement (EIS). The Las Vegas/Pahrump Resource Management Plan (RMP) interdisciplinary team will use the collected data and issues contained in this Scoping Report to generate alternative management decisions. Then alternatives will be analyzed for their potential impact on the natural resources and resource uses. After impacts analysis, the Draft RMP/EIS will be provided to the public for a 90-day comment period. Figure 5 displays the general Draft RMP/EIS schedule including opportunities for public involvement.

**Figure 5. Las Vegas/Pahrump Field Office RMP/EIS Planning Schedule**

