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## APPENDIX A—PUBLIC COMMENT SUMMARIES

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### INTRODUCTION

This appendix contains public comments and/or summaries of public comments received during the scoping period. This includes all comments received during the public scoping meetings (including oral transcriptions), as well as all written comments (i.e., hard copy letters and emails). Each comment letter was read and individual comments were identified, summarized when necessary, and entered into an Access database. Each comment was categorized by the major resource/use/designation raised in the comment. This appendix contains all the individual comments from that analysis process. As these comments are taken from public letters, they may contain inconsistencies in terminology, acronyms, references, or inconsistent or inaccurate policy statements. These were not corrected in this appendix. Terminology and acronyms were carried over from the original comments without an attempt to interpret or define them. In addition, comments that contained verbatim duplicate comments were not duplicated in this appendix or in the comment or issue analysis, as the National Environmental Policy Act (NEPA) or the Federal Land Policy and Management Act (FLPMA) does not require or encourage accounting for simply the number of comments (e.g., votes), but the addressing and identification of issues to consider in the environmental impact statement (EIS).

### ACCESS AND TRAVEL MANAGEMENT

**Comment:** Do not close any additional roads under the new plan, closures and restrictions on access and travel from past planning decisions are sufficient to protect resources.

**Comment:** Work with Amargosa Valley to develop a surfaced road from Valley View to the dunes.

**Comment:** Allow OHV access to areas of natural beauty, not just in designated OHV "parks" or areas. Provide access within public lands for OHV users who use OHVs as a means to access and view nature.

**Comment:** Through the revised RMP, provide access to open areas through closed, commercial and public works areas for OHV users, hunters, equestrians and bicyclists. Include signage in non-attainment dust areas to inform users to slow down.

**Comment:** Change the classification of "limited to designated roads and trails" to "limited to designated roads, trails and washes".

**Comment:** Keep existing RS 2477 road open for access to washes. Verbiage containing "mini events" should be removed from the RMP and permits not required for small groups of vehicles.

**Comment:** Designate OHV access routes through closed areas, frontages, and areas such as commercial, industrial and public works lands.

**Comment:** Provide access to washes by designating roads, trails and washes as open to OHV use.

**Comment:** Complete comprehensive travel management concurrently with the RMP process. The RMP should also identify priorities for implementation of the travel management plan, which may also be instructive in the event that the agency expects that additional travel planning will be needed. Special management areas, such as ACECs, special recreation management areas and citizen-proposed wilderness, must include travel designations within their boundaries. Priorities for sub-regions to receive

comprehensive travel management planning, which can also be useful for guiding implementation, were identified in the Draft RMP issued by the Little Snake Field Office (available on-line at: <http://www.co.blm.gov/lspa/rmp/index.htm>) and we would encourage you to further prioritize areas in this manner as well. Please see Appendix F from the Little Snake Draft RMP, which sets out criteria for prioritizing areas to receive comprehensive travel management planning.

All routes designated in WSAs should be specifically identified in the RMP as “ways” and distinguished from “roads,” since WSAs are, by definition, roadless. All ways should also be identified as temporary. The RMP must acknowledge the likely damage from permitting ongoing ORV use in WSAs and the benefits to wilderness values from limiting such access, and complete a thorough analysis of each alternative. In general, in order to comply with the IMP and BLM’s regulations regarding motorized use, the RMP should seek to minimize ORVs in WSAs, permitting ways only if they do not impair wilderness suitability or damage wilderness characteristics. For any ways that will be retained, the BLM must show that they are permissible under the standards of the IMP and the regulations, and also show a compelling reason as to why it is necessary for the way to be open to ORV use. Further, the RMP must make specific commitments and include a protocol to monitor the potential impacts on wilderness suitability and wilderness characteristics of any ways left open to ORVs in WSAs and to immediately close these ways (and proceed with restoration) if impacts are identified. The BLM should adopt the approach to management set out in IM ID-2008-016, including creating a baseline of conditions in the WSAs, setting out a detailed monitoring program, incorporating standards for determining if use of these ways is impairing wilderness values, and committing to take measures to end any such impairment immediately, including through closure and restoration of ways. Closure and restoration of all ways in WSAs is most consistent with the IMP and with protection of the other natural resources in the Las Vegas planning area.

Address travel management on a landscape-wide basis by addressing the impacts of all roads in the planning area and accounting for the landscape-wide impacts of these roads.

Use a legal definition of “road” (as defined above) when designating routes and exclude “user created” routes from the inventory. Further, the BLM should explicitly evaluate all motorized use under the minimization criteria and only designate areas and routes for motorized use that meet these standards.

Use the information provided in Appendix 1 of this comment letter to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the Las Vegas RMP.

BLM should neither make determinations regarding R.S. 2477 claims as part of this planning process nor permit those assertions to influence its decisions regarding permitting motorized use.

**Comment:** Leave public lands open to the public.

**Comment:** Review issues associated with the privatized airfields in Sandy Valley, Searchlight, and Cal-Nev-Ari.

**Comment:** The RMP should address management of designated roads in proximity to Boulder City so that access is controlled with adjacent private lands.

The RMP should address how future interstate transmission projects are to be coordinated amongst all landowners and political jurisdictions.

**Comment:** Nye County requests that the environmental effects associated with the adjudication and continued use of RS-2477 roads should be addressed in BLM planning and management actions of this RMP revision.

**Comment:** Is it true, as many college professors fear, that classes will have to go to Death Valley in CA or Grand Canyon in AZ because Nevada areas will be closed to more than 11 people unless 90-day application for \$95 permits is made?

**Comment:** I believe that land used for energy development can exist within the public lands as long as it does not restrict access to other uses. Travel routes and trails must not be closed for energy development or if they are to be closed, new routes developed around the sites giving access to existing roads and trails interrupted by the energy site. The BLM management plan for Gold Butte area has closed all the routes that provided the most enjoyment of the recreationist. The closure of public lands to vehicle access on existing roads that have been in place before Lake Mead was even a lake is outrageous. These trails and roads have historical meaning and should be maintained to preserve our heritage of the pioneers who settled this part of the country.

**Comment:** Open back up all roads and trails in existence before 1998 per federal law in the Gold Butte, Overton arm and north eastern Clark County.

**Comment:** My brother will never be able to enjoy the many highly protected/restricted public lands because now only the fit and young can ever endure the distances required to ever set eyes on much of said land. It is wrong to restrict the elderly and the disabled from enjoying the same lands that all of us have enjoyed.

**Comment:** The verbiage of the RMP should change to read “Designated as Limited to designated roads, trails, and washes”.

**Comment:** Consider designating more trails for OHV use that do not impact the sensitive resources of the area, especially if there are already trails on the ground and in use but not currently designated. Consider designating a route in this area where competitive events can be held with certain limitations that protect the sensitive resources of the area.

**Comment:** The BLM is to go by NRS 470.191 that the BLM is to follow these rules per the order that Congress instituted in 1979. The BLM needs to open any trails or roads that were established before 1976 per congress.

**Comment:** The BLM has no right to close these roads or trails without the County's ok and they are to remain open at all times for public use even if there is a special event going so the public can still use the trail or road.

**Comment:** I would like to see the BLM have more law enforcement out at Logandale trails on busy weekends and police the illegal tour people that are using Logandale trails.

**Comment:** I know there are a lot of people out there who would like all the public lands closed down to all vehicle travel. First of all this is unrealistic and secondly against the law. These are public lands and should be open to all the public, young, old and disabled.

**Comment:** This means that the roads that already exist should be kept and other roads should be developed so that there is more room for all.

**Comment:** PIC with the help of several organizations GPS'd many roads and trails. We made suggestions on what to keep open and what to close. Why would you do it again? Or why don't you let the users make some decisions?

**Comment:** Dust is in the desert. You should not spend monies on trails that are not near residential.

**Comment:** The Center recommends that the BLM address travel management on a landscape-wide basis by addressing the impacts of all roads in the planning area and accounting for the landscape-wide impacts of these roads. 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 resources areas.

**Comment:** BLM must apply a legal definition of "road" within the planning process, develop appropriate criteria to accurately gauge what is or is not a road, ensure that illegal "ghost roads" are not legitimized, and in fact, close and reclaim such "ghost roads." Some legal roads serve important travel needs and are appropriate for motorized use. However, routes that are not "roads" should not receive equal consideration. The agency has a definition of "road," and this definition should be adopted and used consistently in order to create a regular expectation and approach on BLM public lands. We note however, that merely meeting the definition of a road is not sufficient to justify designating a route. In fact, the BLM must still consider whether a route has negative impacts to sensitive or protected resources, such as by the process recommended in this document, and should only designate those that do not impact these.

**Comment:** Therefore, it's incumbent upon BLM to exclude "user-created" routes from the inventory. To include these routes is to legitimize and "grandfather in" illegally created routes and/or routes which have not been improved or maintained by mechanical means to ensure regular use.

**Comment:** Motorized recreation is a fast growing and important recreational use of federal public lands in Nevada. If such a use is to be allowed on the Southern Nevada District, it must be restricted to designated trails and roads that have been carefully selected and cross-country travel.

**Comment:** I think motorized travel up washes is a legitimate way to access public lands I prefer to use existing dirt roads but the maps are very inconsistent, some show roads to use and others say no use is allowed. Please cleanup the land use maps, I never know if I'm legally visiting.

**Comment:** No more road closures. Ageing populations need more easy access (ATV, etc.) to isolated areas. Limit man-made structures (toilets, fences).

**Comment:** Please don't close any more land to OHV use.

**Comment:** Please leave the Gold Butte area as is.

**Comment:** Do not close any more roads.

**Comment:** No roads should be closed without specific discussion about its use.

**Comment:** Allow motorized access to Gold Butte area.

**Comment:** Do not close RS-2477 roads by creating ACECs and other special designations that would contain these roads.

**Comment:** Please provide access to trails and other areas for senior citizens.

**Comment:** Please provide access to areas for senior citizens.

**Comment:** We need better access to public lands by vehicles.

## CULTURAL RESOURCES

**Comment:** Protect cultural resources through education rather than isolating or restricting access to the cultural resource.

**Comment:** With respect to renewable energy projects, areas with important cultural values should be avoided.

**Comment:** Consider the effects of all RMP decisions on the wealth of archaeological and cultural values located in the planning area, especially within the Gold Butte area. Since it will be difficult to evaluate the effect of decisions when the location of cultural resources is unknown, the BLM should undertake an archaeological inventory wherever necessary. In particular, in regards to travel planning, the BLM should consider where motorized and non-motorized routes are directing people, inventory cultural resources along those routes, and carefully consider the potential impacts to those resources.

**Comment:** Preserve areas with historical value. Do not allow solar and wind development in these areas.

**Comment:** The mines have historical meaning and value. They should be preserved in the existing state. I find them very interesting in their design and methods with the equipment they used to extract the minerals they were after.

**Comment:** One issue for the Southern Nevada District should be the effects of urban growth on archaeological sites. Recreation on public lands has been extremely damaging to cultural resources that the Bureau of Land Management is charged with managing and protecting under the National Historic Preservation Act and Archaeological Resources Protection Act. All terrain vehicles are used to access previously inaccessible archaeological sites in remote areas of the district and often sites are illegally collected, vandalized or ATV tracks cut through sites. The Nevada State Historic Preservation Office is aware of the creation and implementation of the site stewardship program for Clark County and other measures employed to try to protect known significant archaeological sites. However, we are interested in knowing the efficacy of these efforts - what is working and what isn't working. Will the revision to the RMP examine past practices of site protection to determine if current measures should be modified or additional measures need to be developed and implemented?

**Comment:** Cultural resources must be protected, BUT we should have the opportunity to visit these resources.

**Comment:** CULTURAL AND PRE-HISTORICAL RESOURCES: Southern Nevada is rich in historical and prehistorical resources, including petroglyphs, pictographs, rock shelters, roasting pits, pit houses, middens, and remnants of historical human habitation. How will BLM protect these priceless resources? Some notable examples of areas that are filled with such treasures are the Gold Butte and Upper Las Vegas Wash/Tule Springs areas. What additional protection does BLM plan to provide to areas such as these which are facing increased degradation?

**Comment:** I believe there should be an increase in protection for archaeological sites in areas that are easily accessible to the public, especially sites that are accessible via ATV. The Gold Butte area is one of

the hardest hit areas when it comes to the destruction of archaeological resources. Limiting public access or having increased protection of these resources could reduce vandalism and looting.

## FISH AND WILDLIFE

**Comment:** Work with the Lake Mead NRA to identify measures for protecting Big Horn Sheep habitat and populations.

Work with the Lake Mead NRA to protect and restore Desert Tortoise habitat.

**Comment:** Protect tortoise habitat with the same fence as seen along Lake Mead.

**Comment:** Eastern Ivanpah Valley should be protected and included in a Desert Tortoise Recovery Area, specifically the high-quality habitat where the NextLight Silver State South and North are proposed.

With respect to renewable energy development, consider impacts to the Desert Tortoise, Gila Monster, Burrowing Owl, state and federal sensitive bird species, American Badger, and bats.

**Comment:** Ensure that management actions and management designations are done in conformance with the Draft Revised Desert Tortoise Recovery Plan.

Evaluate whether remuneration fees collected to mitigate for residual impacts to desert tortoise have been used effectively to offset impacts that occur on BLM managed lands.

**Comment:** Adopt planning and decision-making processes (including data collection, analysis, and monitoring) that employ measurable planning objectives at multiple biological scales (i.e. wildlife populations, habitat and ecosystem conditions) to ensure viable wildlife populations. This recommendation is strongly echoed by the Western Governors Association's Wildlife Corridor Initiative.

Ensure that habitat and migration corridors are adequately identified and protected.

**Comment:** The department encourages serious consideration of the broad array of wildlife values and physiognomic features both within and outside the boundaries of the Las Vegas District and how the tone set in the RMP Revision affects landscape level relationships for sustaining healthy wildlife populations and habitats.

Embrace tenets of the Department's 2006 Wildlife Action Plan.

- Items to include in the RMP process:
- Identify priority species
- Identify key habitats
- Apply species and habitat predictive models
- Assist in formulating local habitat objectives
- Apply population parameters
- Offer wildlife population monitoring services
- Identify regional population objectives for wildlife
- Participate in adaptive management processes.

**Comment:** I was talking with NDOW a bit about possibly integrating some of the Wildlife Action Plan efforts into the LV RMP revision. We have some really good tools to help you with that effort especially with some of the GBBO bird data but others as well. More of a proactive approach.

**Comment:** The Ranchers have all been removed and now the water development by the ranchers has not been maintained and wildlife has suffered for it. Birds and quail along with deer, coyotes, cougars, and Big Horn sheep flourished with the water hole improvements. BLM needs to improve these water stations put in by the ranchers so the wild life can come back to the numbers that used to exist in the Gold Butte Area.

**Comment:** Defenders offers the following additional planning issues for inclusion in the RMP revision:

- Inadequate conservation of public land habitat for Desert Bighorn Sheep, Mule Deer and Raptors.

**Comment:** The use of measurable conservation targets and thresholds (e.g. self-sustaining populations and minimize the likelihood of listings) adds structure to decision-making processes, and is very much in line with BLM's desire to practice science-based land and resources management. The use of baseline biological information concerning target fish and wildlife population condition (the BLM Land Use Planning Handbook H-1601, discussed below, provides direction for incorporation of wildlife population and habitat goals and objectives into land use plans), along with the forecasting and monitoring of population trends/habitat conditions over time following development decisions, provides a science-based means of renewable energy development within an adaptive management framework.

**Comment:** In addition to listed species, Defenders has a strong interest in developing policies and supporting conservation and development decisions that avoid ESA listings and sustain the fish and wildlife populations on federal lands. We strongly urge BLM to identify the full spectrum of wildlife and fisheries management needs and opportunities on public lands within the planning area and to identify new protective management allocations needed to sustain these resources in the face of increasing demands for use of our remaining public

**Comment:** We also urge BLM to identify connectivity habitat for the purpose of maintaining species movements and gene flow on a landscape scale. Such connectivity habitat will include occupied habitat conforming to the recently developed habitat model by the U.S.G.S. rather than artificial, narrow "corridors" of habitat to link known populations in the ACECs. The overall strategy should be to maintain and stabilize all known populations, prevent retraction in the known range, and apply intensive habitat protection and enhancement actions within ACECs sufficient to maintain and improve existing populations.

**Comment:** Raptor nesting and foraging habitats need to be recognized as essential components of the wildlife resources occurring in the planning area. These areas need to be zoned in a manner that excludes all multiple-uses that would be incompatible with the goal of protecting and stabilizing raptor habitats and populations.

**Comment:** Although the RMP appears to contain admirable goals and objectives for management of Desert Bighorn habitat, we find that most of those would be achieved through a water development strategy, including construction of water catchments or guzzlers. We urge BLM to develop strong provisions for protecting all essential habitats from any multiple-uses that would result in appreciable habitat loss, fragmentation, or result in impact to naturally occurring sheep populations.

**Comment:** Threatened, endangered, and sensitive species habitat; unique habitat features; high integrity terrestrial and aquatic ecosystems; and wildlife habitat connectivity zones should all should be considered high-resource value lands that must be conserved through effective protection policies. We believe existing BLM policy and laws affecting public land uses support strong, effective actions to protect these high-value resources.

**Comment:** We strongly recommend that BLM exclude from consideration for renewable energy development public lands with the following biological resources and values. These areas are biologically significant, and their development will lead to unnecessary conflicts:

- Landscape-level corridors providing opportunities for natural movement of plant and animal species, and especially corridors linking subpopulations that comprise a metapopulation, such as bighorn sheep and desert tortoise.
- T&E critical habitat—designated and proposed.
- Habitat for BLM designated sensitive species.
- BLM-designated Areas of Critical Environmental Concern (ACECs) and Desert Wildlife Management Areas (DWMAs).
- Upland habitat located within two miles of any seep, spring, stream, or wetland.
- National Landscape Conservation System (NLCS) lands (National Conservation Areas, National Monuments, Wilderness Areas, Wilderness Study Areas, Wild and Scenic Rivers, and National Historic and Scenic Trails).
- Special Recreation Management Areas.
- Areas with wilderness characteristics.
- Areas allocated as wildlife habitat management areas.
- Zones around known raptor nesting sites adequate to provide protection for essential foraging areas

**Comment:** Loss and modification of springs, seeps, and wetlands habitat throughout the region led to the creation of many of these protected areas and to the imperilment of many aquatic and wetland-dependent species. “[Ash Meadows] Refuge provides habitat consisting of spring-fed wetlands and alkaline desert uplands for at least 25 plants and animals found nowhere else in the world.” Of these unique endemic species, there are four endangered fish species: Devils Hole pupfish, Ash Meadows Amargosa pupfish, Warm Springs pupfish, and Ash.

**Comment:** EMPHASIS ON PRESERVATION: whether it is a species or air quality. FORGET about their own individual net worth, think about others. Keep wildlife corridors clear of high impact programs, but minimal roads through create a wonder to behold and a great teaching tool to remind us all what we could lose if we are not mindful of the wildlife.

**Comment:** We hope the BLM will expand the existing restricted area at Big Dune to provide more habitat for Giuliani's dune scarab and Large aegialian scarab.

## FUELS AND FIRE MANAGEMENT

**Comment:** Develop fire management objectives that provide for mutual management objectives with the Lake Mead NRA along joint boundaries and provide for minimizing fire in desert tortoise.

## GENERAL COMMENTS

**Comment:** Provide for multiple-uses of public lands without excluding one particular group of users because of their choice of recreation. Consider the impact of the decisions made by BLM on my family, friends and my community.

**Comment:** Evaluate the effectiveness of management actions and mitigation measures implemented in the 1998 RMP and demonstrate that information gained through evaluation and monitoring is incorporated into the amendment.

**Comment:** Make every attempt to encourage the public to participate in the RMP revision including holding workshops, making a preliminary range of alternatives available for public comment prior to preparing a Draft RMP, providing interim information regarding inventories of routes and visual resources, posting GIS files, and posting analyses such as ACEC evaluations and analysis of comments submitted on the Draft RMP to the RMP revision website.

Identify the agencies and tribal and local government entities granted cooperating agency status and post this information on the RMP revision website.

Protect the abundant natural values present in the Las Vegas planning area when developing management alternatives in the Las Vegas RMP and evaluating environmental consequences. Include consideration of management activities on adjacent lands and potential impacts to those lands.

**Comment:** We request that our Moapa Valley's Essential Rural Conservation Components be applied, considered as formal comments, and incorporated into the revised LV RMP. We specifically request that the revised RMP include and address the rural values identified in this document.

We request that the local community management plans be considered as formal comments and be incorporated into the revised BLM RMP (full list of documents is included in the full comment letter).

**Comment:** Allow a citizens committee to work with the BLM on the RMP revision.

We would like site specific environmental review in certain areas.

Before the DRMP is provided to the public, we would like to review it and provide comments.

**Comment:** Study airspace operations for Nellis and Creech Air Force Bases and establish appropriate management practices for arrival and departure corridors on federal lands near these military facilities.

**Comment:** We request that the BLM apply a consistent level of analysis to all geographic locations within the planning area to ensure there are no inconsistencies of planning level between Clark and Nye Counties.

Nye County requests the BLM include the Amargosa Valley Area Plan and subsequent revision, by reference, in the RMP and the BLM consider the Plan when making decisions.

**Comment:** BLM should adopt planning criteria that ensure consistency with officially approved local government plans to the maximum extent possible.

**Comment:** The BLM indicated that the information/subjects displayed at the scoping meetings would be on the web. I could not find it and would like a web address to view it.

**Comment:** Listen to concerns and issues about how to include Bunkerville's criteria so that it is relevant.

**Comment:** The old RMP didn't address (or even know about) the tremendous increase in population, the solar and wind energy issues, etc. as well as the Road Designations.

**Comment:** Public lands belong to all the public, not just the tree hugging kooks. We need public lands left open to the public for multi-use, especially more open to recreation and off-highway vehicle use.

**Comment:** The level of analysis provided by the Environmental Impact Statement (EIS) and subsequent coverage afforded under the National Environmental Policy Act, or NEPA, should be adequate to allow for the issuance of agency categorical exclusion decisions for proposed actions that do not include new land disturbances. Such activities may include scientific data collection activities, paving/chip sealing of existing roads, and other no-, or very-low effect activities. Based on difficulties encountered with obtaining land use authorizations since approval of the 1998 RMP/EIS, Nye County concludes that the review did not adequately consider the potential environmental consequences of the BLMs decisions or management direction as they would apply to proposed actions in Nye County. The 1998 RMP/EIS provided a far more comprehensive analysis and NEPA review for the Planning Area in Clark County. The BLM must apply a consistent level of analysis to all geographic locations within the Planning Area.

**Comment:** Use a systems approach to integrate scientific analysis of entire ecosystems, even across artificial geopolitical "barriers."

**Comment:** Provide for complete openness to the public and scientific community. Engage in no stipulated agreements without full and complete public and scientific participation. All documents relating to any and all stipulated agreements need to be reviewed, and all records, correspondence, etc. need to be publicly available, preferably online.

**Comment:** Do not rely on data, analyses, interpretations, or conclusions that have not been fully publicly and scientifically reviewed and vetted. "Economics" – properly termed "political economy" - is not a science, and must not be treated as such, but rather addressed as a source of human

**Comment:** The 1998 RMP and maintenance record have well-described uses allowable within limited use areas; however, these descriptions may still lead to some conflicts with users or activities not yet anticipated by BLM. For this reason, I request that BLM consider adding a statement to all limited area designations that uses or activities may be permitted, or allowable, on a case- by-case basis to ensure that any as yet unforeseen use may not meet such a conflict when it could otherwise be permissible within the guidelines of the CFR and the revised RMP.

**Comment:** We also need the BLM to be less restrictive for grazing, mining, and motorized use.

**Comment:** I would like to see the BLM reach out to all people and groups. In this day of e-mail and other electronic media there is no excuse for not having everyone's input. I would hope that the BLM would reach out to everyone. We all pay taxes and this is all our land, not one person who has their own agenda. Please leave the roads open and available to the public. We don't need more wilderness and areas that we cannot easily visit and enjoy.

**Comment:** I do not think there should be more law enforcement personnel. Let clubs and individuals teach proper rules and etiquette.

**Comment:** Ensure that local authorities should have a large impact on what happens in their areas.

**Comment:** Non-profits want to do service projects and help with the environment. Use them.

**Comment:** Before any major changes, BLM should get public comment.

**Comment: OTHER PLANS:** What is the relationship between the RMP and other BLM land use plans, such as National Conservation Area (NCA) management plans, Multiple Species Habitat Conservation Plan (MSHCP) plan, transportation plans, “disposal” Environmental Impact Studies (EISs), etc.? How is the BLM going to coordinate all of these disparate management plans without piece-mealing National Environmental Policy Act (NEPA) compliance? How does the BLM incorporate federal legislation into the RMP including the National Environmental Policy Act of 1969 and the Federal Land Policy and Management Act of 1976?

**Comment: RESTORATION/REHABILITATION:** Once the status of public lands is determined, how is the BLM going to maintain or improve them? This will involve fire protection and rehabilitation, law enforcement, weed/invasive species control, and off-road vehicle (ORV) management.

**Comment: DESERT DUMPING AND TARGET SHOOTING:** The illegal dumping of residential, construction and industrial waste has become a serious threat to our public lands in Southern Nevada. Similarly, target shooting in the prohibited area poses a hazard to natural and cultural resources. How is the BLM going to monitor and eliminate such illegal activities?

**Comment:** In an effort to provide the most thorough and detailed comments to BLM, we studied the existing RMP and the accompanying Record of Decision. We found the RMP to be incredibly difficult to read and comprehend; lacking in information on basic wildlife habitats and species distributions, especially for BLM Special Status Species; and unclear as to habitat conservation commitments for various species that warrant special management attention.

**Comment:** In addition to the statutory guidance provided by the Federal Land Policy and Management Act, 43 U.S.C. § 1763, et seq. (“FLPMA”), the Endangered Species Act, 16 U.S.C. §1531, et seq. (“ESA”), and the National Environmental Policy Act, 42 U.S.C. § 4321, et seq. (“NEPA”) (discussed in detail below), Defenders believes that the BLM has clear, affirmative policy direction to conserve biological resources, including fish and wildlife populations and their habitats, beyond the rather narrow statutory objective of “minimizing” impacts to the environment. Conservation objectives and strategies are found within BLM policy guidance contained in various policy manuals and handbooks. Additional guidance for science-based planning and decision-making is found in the Land Use Planning Handbook.

**Comment:** We urge caution on the traditional approach to public land management that assumes that with mitigation measures required and implemented for a multitude of land use projects, nearly any project can be made compatible. Mitigation typically results in minor reductions in environmental impacts for specific projects, and the cumulative load of the net impacts need to be carefully considered. Long term health and productivity of public lands on a landscape level need to be assured through a conservation strategy developed through a robust RMP process.

**Comment:** We also note that the existing RMP offers scant protection for lands and their biological resources and values that fall outside of Desert Tortoise Areas of Critical Environmental Concern (“ACEC”) from the impacts associated with discretionary multiple-use activities such as off-road vehicle use, livestock grazing, renewable energy facility development, mining, and energy transmission systems. BLM must not embark on a revision of this RMP simply because of the increased pressures for utilizing public lands for renewable energy, urbanization, and other commercial uses. Although these demands may be met in some cases, they must be fully balanced in favor of habitat conservation and sustainability in order to comply with BLM policy, and legal and regulatory mandates governing public land management, off-road vehicle use, protection of the biological resources and values, recovery of endangered species.

**Comment:** With regard to integrating the policies of Manuals 6500 and 6840 into the RMP, we urge BLM to craft management strategies that would clearly and substantially reduce multiple land use issues and conflicts on wildlife resources, especially for those that are Special Status Species. At a minimum, such management strategies would need to meet the objectives of the policies contained in Manuals 6500 and 6840. We strongly urge the BLM to carefully and clearly zone or delineate public lands for compatible multiple-use allocations based on resource occurrence, value and sensitivity. All lands where certain multiple-uses would contradict these policies should be excluded from further consideration of those specific uses. Likewise, zones should be delineated according to compatible multiple land use. Of course, such zoning would not preclude the need to perform site-specific analyses for all land use proposals, but we think a compatible use zone approach would help achieve a greater degree of conservation and generate fewer resource conflicts.

**Comment:** We urge BLM to take the opportunity to avoid unnecessary controversy and conflict from the outset of this land use planning process. One suggested method, and one that the BLM appears to be using to some degree, is to avoid allocating public lands with known high resource values for industrial, commercial, and urban development, and instead prioritize low resource value areas as those most suitable for such development (substantive detail on high-conflict and low-conflict land types are described below).

**Comment:** Despite uncertainty, management agencies cannot spend years developing adaptation strategies and delaying implementation until more information is available; strategies must be designed and implemented now with refinement throughout the process as we learn more. Using information and scenarios from pre-planning assessments, land management agencies can first address uncertainty by developing alternative management responses that will be implemented in an experimental approach, with appropriate monitoring and research capabilities to study the effectiveness of different approaches. This approach should include explicit identification of desired future condition of the system in question, development of measureable objectives to achieve ecological sustainability, protection of ecosystem services and species diversity, and the use of adaptive management to monitor and refine the process. Incorporation of science-based objectives and adaptive management throughout the process will help to avoid conflict and establish a sound baseline for addressing the impacts of climate change.

**Comment:** Today, digital mapping and electronic data files are standard practice for the dissemination and sharing of information. The 1998 RMP maps are difficult to read and use for planning purposes. To alleviate such problems, we request that all maps developed for the revised RMP be made available in electronic form and format (i.e., shapefiles, Google Earth, interactive tools, etc.) similar to that done by the Department of Energy's WECPEIS. This will provide a valuable planning and review tool to the public going into the next decade of planning to be covered by the revised RMP.

**Comment:** The RMP/EIS must meet the requirements of the National Environmental Policy Act (NEPA).

**Comment:** The BLM must gather and analyze baseline data that is needed to fully understand the direct, indirect, and cumulative effects of its decision. The NEPA requires BLM to “describe the environment of the areas to be affected or created by the alternatives under consideration.”

**Comment:** NEPA also requires that an EIS contain a detailed statement of alternatives to the proposed action. NEPA requires that the preparing agency “[r]igorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.” There must be an alternative that provides an environmental baseline, a description of the current existing environment in the planning area, against which to evaluate other alternatives.

**Comment:** The BLM must conduct a thorough cumulative effects analysis. The CEQ regulations implementing NEPA clearly direct federal agencies to consider the direct, indirect, and cumulative effects of their actions on environmental resources. 40 C.F.R. § 1508.8. The regulations define “cumulative effects” as: The impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 C.F.R. § 1508.7 This analysis is required to consider the incremental impacts of actions in conjunction with the impacts of past, present, and future actions. Thus the agency must look beyond the life of the proposed action. In addition, these actions must include the ramifications of all actions. This includes state, federal, and private actions. The analysis of cumulative impacts should also focus on each affected resource, ecosystem, and human community, addressing the sustainability of all factors.

**Comment:** The RMP/EIS must meet the requirements of the Federal Land Policy and Management Act.

**Comment:** The RMP/EIS must comply with the ESA, including appropriate Section 7 Consultation.

**Comment:** Species may be threatened by global warming; of local concern, are impacts to the desert tortoise, Moapa dace, and other desert fish, and low elevation plants such as the bear poppy and white-margined penstemon.

**Comment:** All “new documents” should be open to public comment.

**Comment:** We do not want: Any more road closures or restrictions; Any more restrictions on multiple-use; Any more restrictions on access; Any more restrictions on traditional uses of this area; Any more areas removed from the general public's use.

**Comment:** Nonprofit groups such as Boy Scouts, church and school groups, Partners in Conservation, etc. should be used as much as possible for cleanup projects, site development and maintenance, and area monitoring of projects.

**Comment:** What we should do about water sources in and on the land. How should we conserve the land, the wildlife, the ecosystems, and the natural habitat?

**Comment:** FISCAL RESPONSIBILITY: While I know it is critical to address public lands issues in this day and age that so many citizens have an opportunity to negatively impact them, I hope the system is taking care to spend the funds wisely. The public gets enraged when they perceive waste of taxpayer's dollars and we all want a successful outcome.

**PARTERING OPPORTUNITIES OF ALLTYPES:** I am a strong supporter of state and federal agencies enlisting the support of local groups or business of all shapes and sizes to partnering in caring for our public lands. Only when we raise generation after generation of citizens who really understand that it is their responsibility to be caretakers of this planet. Please place a strong emphasis and opportunity to grow that belief into everything you do. A clear, simple written agreement between government and volunteer group to assure each side understands what they need to do.

**Comment:** I am a middle-of-the-road person in many areas -- not favoring large changes, huge expense, too tight controls, and uses that are not publically evaluated and supported (mining, power generation, etc.). All large, controversial proposals should be acted on/agreed to by the public. Fees should be minimized and national priorities better supported -- I realize this is a poor time for that!

**Comment:** I would request that the recommendations made in the Moapa Valley Open Space Study funded by BLM that was finished in December 2009 be followed.

**Comment:** Balance public land uses between abusers of the land and environmental self-centered.

**Comment:** It is unsupported that the 1998 RMP be revised 8 years early. No published reviews for adequacy have been presented in the 5-year review intervals required by the ROD. Of particular force for any changes in the RMP is the identification of any BLM new or revised policies - which have not been presented. Full and complete disclosure by BLM of any and all monitoring and evaluation findings, new data, new or revised policy, changes in circumstances, etc. to support the intended action is mandatory and necessary in advance of public inputs on issues, alternatives, policies, planning issues/criteria, and interests.

The proposed process and the lack of information and data clearly preclude informed public comment and input. Please schedule additional public meeting when the absent vital information has been made available.

There is no basis to complete the RMP within 2 years.

**Comment:** The cities of Las Vegas and North Las Vegas request that, as part of the RMP revision, BLM determine the ultimate managing entity of the CTA, approved land uses with the Upper Las Vegas Wash Conservation Transfer Area (CTA), and management strategies that address public health and safety issues associated with the CTA, to the extent that another EIS would not be required in support of these decisions.

**Comment:** It is very important that the RMP be reader-friendly and useable. Ensure that all sections are compatible and have a big picture accuracy. Sections should not be written in a semi vacuum. Statements should not be made without back-up information provided for the reader. The summary section should be Page One and should be written in a manner that enables the reader to understand the alternatives. The summary section should include a discussion on process. All sections need a clear explanation and cross-referencing of what criteria were utilized. All monitoring sections need a concise discussion on what parameters will be utilized. There should be a clear discussion on timing of implementation of actions. Provide all maps in a consistent format and size.

**Comment:** Listen to the public, not politicians.

**Comment:** Comments from local residents should have more weight than comments from outside groups. Consider local plans when making decisions.

**Comment:** Please ensure that coordination for the RMP is done with adjacent BLM offices.

**Comment:** Please coordinate management with the NPS Lake Mead and other agencies adjacent to BLM land to ensure consistency.

**Comment:** Ensure that the public's comments are taken into consideration when developing the plan.

**Comment:** Ensure that the new plan takes into consideration the shortfalls of the old plan as well as what was working. Gauge the success of the old plan when writing the new one. Implement a monitoring program/objectives in the new plan.

## LANDS AND REALTY MANAGEMENT

**Comment:** The use of federal land sales environmental offsets to satisfy Clark County/Mesquite Multi Species Habitat Conservation Plans should not be imposed on undeveloped lands. Funds received through the sale of land under the Southern Nevada Public Land Management Act of 1998 should be used for land management.

**Comment:** Stop disposal of public land pending planning for a belt of public land around the Vegas Valley being set aside to remain public and undeveloped.

**Comment:** Establish zones where communication towers may be appropriate and that don't compromise the scenic or wilderness settings. Avoid areas in close proximity to Northshore Road and the Muddy Mountain Wilderness.

Do not dispose of lands near the Moapa-Glendale-Logandale areas until water rights restrictions have been resolved by the NSE and it is determined whether or not there is enough unappropriated water in these basins to support development on these parcels.

Evaluate the need for electrical transmission corridors as part of the RMP planning process.

**Comment:** Allow site type ROWs for scientific instrumentation associated with hydrogeologic studies. Allow production wells, storage reservoirs and appurtenances for site type ROWs and associated linear ROWs for pipe lines connecting to the municipal distribution system. Allow communication facilities for use by intergovernmental entities and Virgin Valley Water District to link critical water resource facilities and appurtenances for operation of the municipal

**Comment:** No new utility corridors should be designated until a master plan is developed that addresses the actual need for new central station power plants in Nevada and California.

**Comment:** Coordinate closely with the Clark County MSHCP Plan Administrator on proposed land tenure and management designation changes that could impact the existing or amended MSHCP.

Verify assumptions regarding the establishment and administration of corridors through the Boulder City Conservation Easement.

**Comment:** Work with local governments and Tribes when identifying areas where disposal of public lands may be appropriate.

Don't dispose of parcels valued by local communities for their open space, wildlife habitat, and recreation opportunities. Focus on lands with the SNPLMA disposal boundary first and also consider these lands for renewable energy development.

**Comment:** The revised RMP should increase the width of the ROW planning corridor through the Sunrise Mountain ISA to 3,500 feet. This width matches the currently designated corridor width on either side of the Sunrise Mountain ISA. Maintaining a consistent ROW corridor width through this region promotes responsible development of the corridor and eliminates unintentional land use planning bottlenecks.

**Comment:** We request that, when referring to wind ROW grants, the revised RMP employ terminology consistent with current BLM practice and policy, as embodied in BLM Instruction Memorandum No. 2009-043.

Please include NVN-86300 among the other renewable projects located within the Las Vegas RMP and ensure that it is taken into consideration along with other wind projects during the RMP revision NEPA review process.

**Comment:** We recommend that the RMP revision incorporate the Westwide Energy Corridors pursuant to Section 368 of the Energy Policy Act with one exception. Segment #39-113 of the Westwide Energy Corridors infers that the energy corridor cross the Valley of Fire State Park. We recommend BLM establish a new EHV overhead electric transmission corridor to the north which avoids the State Park.

We recommend that BLM either widen the existing corridor through the Sunrise Mountain Instant Study Area to accommodate additional EHV overhead electric transmission lines, or establish an alternate corridor that avoids the Instant Study Area.

We recommend that the BLM revision establishes additional EHV overhead electric transmission corridor suitable for the siting of major transmission lines.

We recommend that BLM review and compare its Best Management Practices for transmission siting, construction, maintenance, operation and decommissioning set out in the Las Vegas and Pahrump Field Offices RMP, the Westwide Energy Corridor Programmatic EIS and adjacent BLM field office RMPs and revise as necessary to insure consistency.

**Comment:** Protect the community from unwanted encroachment by removing certain parts of the disposal area back into the safekeeping of BLM.

**Comment:** Remove the Jean and Primm disposal areas from the RMP. Review the Indian Springs North disposal boundary to allow for preservation of flood control efforts. Incorporate provisions contained in the Las Vegas Valley Perimeter Open Space Plan into the RMP.

Move that section of the utility corridor currently designated to run through the south end of the Indian Springs community to a more suitable location south of Grandpa Mountain.

**Comment:** The 1998 RMP contains utility corridors on disputed lands and we disagree with the width of the corridors.

The RMP should address how utility corridors affect adjacent land where corridors are shown to terminate.

**Comment:** The West-wide multi-modal corridor must be considered a designated corridor, despite current litigation issues. To reduce impacts to land resources, the 368 corridor should 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.

Nye County requests additional disposal land designations south of Amargosa Valley. As with the town of Pahrump, the current boundary of the Amargosa Valley disposal land should be expanded to be consistent with the goals and objectives of the Amargosa Valley Area Plan.

Nye County requests disposal land designations include the block of land south of US Highway 95, from Mercury east to the Clark County border and public lands adjacent to and underlying operations at the Cind R Lite Mine.

Nye County also requests that the eastern side of the mountains that bound the last Chance Basin remain in disposal.

Nye County requests that public land in Nye County, located on the north and south side of Nevada Highway 160, near the Nye-Clark County line (T23S, R54E, portions of sections 12 and 13) be evaluated and designated for disposal for the purpose of establishing a public park and ride commuter facility.

We request that the BLM include in its planning alternatives, the Pahrump Regional Flood Control Master Plan to allow for future development and land use in connection with flood control infrastructure.

Nye County also requests that the land for the construction of a bypass highway to connect Pahrump to Interstate 15 currently under development by the Town and the County be evaluated for consideration as a future transportation ROW.

Nye County requests that a portion of the Last Chance Basin be evaluated for designation as disposal land in order to meet the critical need for a regional solid waste landfill.

We request that BLM evaluate designation of land in the southwestern Pahrump Valley for the future development of a wastewater treatment facility that would serve the Pahrump Valley.

**Comment:** Ensure that maps within the RMP reflect the County ownership of the Heliport Site south of Sloan Road, the Ivanpah Valley airport, and the designated T/U Corridor.

**Comment:** The revised RMP should eliminate the two previously identified disposal areas near Jean and Primm.

**Comment:** The revised RMP should acknowledge BLM's obligation to manage the T/U Corridor for placement, on a non-exclusive basis, of utilities and transportation and adopt planning criteria to ensure that management actions affecting the Corridor are consistent with the 2002 Clark County Conservation of Public Land and Natural Resources Act.

**Comment:** The revised RMP should clarify that the Congressional directive to manage the I-15 Corridor in accordance with SNPLMA which requires that any disposals conducted in the I-15 south corridor be conducted pursuant to the disposal procedures laid out in SNPLMA. BLM should adopt planning criteria to ensure that management actions affecting the I-15 corridor are consistent with the 2002 Act.

**Comment:** The revised RMP should designate all the areas required for off-site SNSA facilities as special management protection areas. Where BLM is faced with competing applications for lands required for off-site SNSA facilities, it must give more weight to the specific directive by Congress to build the SNSA airport in the Ivanpah Valley than to any competing general public interests.

**Comment:** BLM should adopt planning criteria requiring applicants to comply with federal mandates at 49 USC 44718 and 14 CFR part 77 before BLM makes any final decision on such applications. The BLM should implement measures to ensure that it secures adequate information about potential aviation hazards not fully addressed in the Part 77 process before issuing any final decisions regarding potential land uses.

**Comment:** BLM should indicate that the Airport Site, T/U Corridor, Overlay District and all other lands proposed to be used for SNSA facilities are not appropriate for large-scale renewable energy projects.

**Comment:** BLM should relocate any energy corridors as necessary to avoid creating continuing conflicts between transmission lines and any existing or proposed airports.

**Comment:** SNWA suggests that BLM consider removal or modification of the management direction to not allow site-type ROWs within ACECs.

**Comment:** Additional utility corridors should be identified in the RMP revision and land use restrictions in those corridors should be compatible with utility projects. Specifically, there is a need for a corridor either through or around the Instant Study Area on the eastern side of the Las Vegas Valley.

**Comment:** SNWA suggests that the utility corridors identified in the RMP incorporate the currently identified LCCRDA corridor coordinated with Lewis Brownfield of the Las Vegas BLM District office on June 27, 2008.

**Comment:** Land restrictions within utility corridors, such as VRM classifications and ACEC designations, which would preclude or restrict the intended use of these corridors for both aboveground and buried utility lines should be removed.

**Comment:** How will public lands be disposed of? How will trails be developed for OHV use? Will lands be disposed for use in renewable energy production?

**Comment:** Will a thorough analysis be provided of the cumulative effects of land disposal and the amount and intensity of development it would be expected to facilitate? Will analysis be provided of the future development capacity within the planning area should the water pipeline to northern Nevada not be constructed?

**Comment:** Will the conservation transfer area be included in the RMP?

**Comment:** I object to the disposal of more public lands so that cities and counties can continue urban sprawl in our western US. For instance I think the city of Las Vegas should seek to re-develop its urban blight rather seek additional lands to expand its boundaries. Lincoln County while not in the LV District is also a good example. Huge tracks of land were made private only to have the development stall during this time of financial stress. Public lands are very special and not just for "disposal".

**Comment:** The Town of Pahrump wishes to address the current boundaries of potential and current disposable land located in the Regional Planning District of the Town of Pahrump.

The Town of Pahrump would like to consider the increasing and decreasing of disposable land so to comply with the Town's long term economic Master Plan and energy transmission corridors.

**Comment:** No land should be in a "disposal" category unless it has water available in the local area, without import from another administrative hydrographic basin.

**Comment:** BLM's primary focus needs to be on a sustained future, and not on political expediency/speculation. Consider leasing land rather than sale whenever possible.

**Comment:** Before selling Disposal acres, find out what the timeframe of development of this land. With the economy, I doubt if developers will be expanding very fast. Let's cut back on the number of acres and let that develop.

**Comment:** Because of our economic situation, sale of land should not be used to get more money. It should be used to see if it will be used for the public recreation use.

**Comment: PUBLIC LAND DISPOSAL:** Is the question being asked – “Do we want or need more land disposal?” In at least one alternative in the plan, will there be a proposal that all public land be retained, with no land auctions? Based upon today’s economy versus that of just a few years ago, can a formula be implemented that ties population growth in to public land disposal (no growth, no land disposal)? There could be other mechanisms explored as well.

**Comment: STATUS OF PUBLIC LANDS:** What are the conditions of public lands – excellent, good, fair, poor?

**Comment:** The Sierra Club opposes energy development on public and private lands and in waters that are currently protected by legislative or administrative designations or that the Sierra Club has proposed for special designation based on specific environmental or wilderness criteria. Exceptions are allowed only where the proposed development can be shown to have insignificant effect on the resources for which the special designation was, or would be, established. This overarching consideration applies to all energy resources covered in this policy.

**Comment:** On the other hand, disturbed lands (including non-Federal lands) located in proximity to existing developed infrastructure including road networks, communication and transmission facilities, and mineral materials will enjoy much higher probability of project success, public acceptance and sustainability. Land management decisions are often most challenging for the “places in between,” where values collide and there is not a clear path to avoid conflict. Having a structured decision-making process, with clear criteria in place that can guide tradeoff decisions, is essential to achieving sustainable conservation and multiple land uses. We hope that the revised RMP analysis and decision-making process will be structured along these lines.

**Comment:** The current RMP identifies area for potential disposal around most of the communities in Clark and other counties. As part of this planning process, the BLM should re-evaluate the need and legitimacy of these areas being identified for disposal. For some, new inventory data and other information is available that can inform the impacts and trade-offs involved with disposal.

**Comment:** Any areas identified for disposal must be encumbered with the assurance that comprehensive NEPA will be conducted prior to any conveyance of the land. Previous disposal area boundary expansions have taken place in jeopardy lands with immense paleontological and biological significance.

**Comment:** We specifically request that the following screens be used to eliminate lands to be considered for disposal: Areas with sensitive and rare natural communities.

**Comment:** We specifically request that the following screens be used to eliminate lands to be considered for disposal: 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.

**Comment:** We specifically request that the following screens be used to eliminate lands to be considered for disposal: Areas that provide habitat for species of plants and animals listed under the state administrative code and the ESA.

**Comment:** We specifically request that the following screens be used to eliminate lands to be considered for disposal: Areas that serve as corridors for species movements between key habitat requirement areas and corridors needed to accommodate genetic flow and for climate change adaptation.

**Comment:** The BLM also needs to decrease the disposable acreage, especially at this time when sales are dead. The BLM must get the public involved with an aggressive program to get organizations and businesses involved.

**Comment:** Changes to disposal areas for communities: I realize that unless BLM property surrounding urban areas such as Las Vegas are released to the cities, it is difficult to grow. However, BLM land should not be made more attractive than private property. Las Vegas has lots of room to “in-fill” on private property, which should result in less urban sprawl, and less demand on expansion of utilities.

**Comment:** There seems to be absolutely no communication between the BLM and local governmental agencies with regard to land use.

**Comment:** Public land disposal should be limited. Disposal areas that are identified in the planning area should undergo a full and comprehensive NEPA process before conveyance.

**Comment:** Prior to any land disposal, areas already set aside for auction, should be reviewed as to the affected impact such disposal would be to the environment. Such review to include USGS data concerning the availability of water to that basin, early man-made sites, visual impacts to surrounding private property, and other related issues. If such review reflects any impact that said land sales be withdrawn until such time the issues be resolved.

Prior to any consideration to dispose any land, data on available water resources, including the Nevada State Engineers Data and USGS determinations (surveys), that shows insufficient resources, that the land be withdrawn from disposal.

Any "Right Of Ways" should be denied for wind or/and Solar projects if the related EIS documents show that such projects have any negative impacts on animal, flora, and other factors such as historical and archaeological sites.

**Comment:** TRANSMISSION LINES & ROADS: When there are roads cut through public (state, county, or Federal) lands that were placed to access power lines and other resources please keep these trails open to the public. Railroad and power line roads should be utilized by the public as to not have to create more roads and animosity with the public.

**Comment:** We requested that the boundary line for the disposal area on the east side of Moapa Valley be changed so that the northern boundary would be near the Bowman Reservoir.

**Comment:** 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.

**Comment:** The Nevada Army National Guard requests the areas identified on the attached maps and descriptions should be included on the map "lands identified for disposal". These areas may be needed by the National Guard in the future though recreation and Public Purposes Act request.

The Nevada National Guard is expanding in size and is short facility space to train our soldiers. The Guard would use one or more of the identified areas to construct readiness centers with attached supporting facilities in the next five to fifteen years.

**Comment:** In the interest of protecting private property, and the spring-front in the community of Indian Springs, the designated utility corridor, which connects to the eastern and western boundaries of the community, should be changed to follow the route south of Grandpa Mountain, which is also the route for the Valley Electric power line.

**Comment:** BLM should require maximum possible recycling programs as a prerequisite for any consideration of a request for use of BLM lands for community disposal areas.

**Comment:** Evaluation and permitting of rights-of-way should require strict rules for construction with minimum disturbance for approved construction. Complete cleanup of construction debris should be required and monitored for compliance.

**Comment:** The cities of Las Vegas and North Las Vegas request that BLM work in coordination with the Cities, and in accordance with the requirements of the Southern Nevada public Land Management Act of 1998, to identify potential areas for disposal that would be compatible with growth objectives of the Cities and which will meet future needs.

**Comment:** The RMP revision should consider the need for future transportation corridors.

**Comment:** The Cities have current land use plans that identify flood control features, water and sewer corridors, and critical linkages for roadways and utilities, including adjacent to and through the CTA, which should be facilitated by the RMP revision.

**Comment:** We support the transfer of land located adjacent to the USEN hazardous waste facility near Beatty to the State of Nevada so that the facility may be able to expand in the future.

**Comment:** We request the disposal area surrounding Moapa be revised.

**Comment:** Do not dispose of public lands around the communities of Searchlight and Nelson.

**Comment:** In order to ensure future capacity at the Apex landfill, Republic requests that the BLM, through the RMP revision, make available for disposal for landfill purposes the real property described on Exhibit A to this letter. The property is immediately adjacent to the landfill and constitutes the most economical and technically feasible area for future expansion.

**Comment:** We are concerned about the proposed solar development areas in the Amargosa Desert due to limited water supply and already allocated water rights. We urge the BLM to adopt a policy in the new RMP that is similar to that of California Energy Commission regarding the use of fresh water for power plant cooling that minimizes consumptive water use. The RMP should include the requirement that the embedded mesh ground-water flow model.

**Comment:** The NPS is concerned about the parcels near Amargosa Valley that are designated as suitable for disposal, several of which are adjacent to the Death Valley park boundary. If disposed, these lands could be used for a number of purposes that could increase illegal OHV use within Death Valley, limit access to popular recreational areas of Death Valley, increase illegal dumping, increase the need for law enforcement patrols and increase demand for water in an already over-appropriated basin.

**Comment:** It is requested that the updated RMP include the following land as "Identified and Suitable for Disposal": Mount Diablo Meridian, NV T13S, R47E, Section 26, S half, S half, Section 35, S half N half, NE quarter NE quarter, NW quarter NW quarter. As these lands are already subject to an R&PP lease to

the State of Nevada, but not identified for disposal currently in the RMP, it would be most prudent to rectify this situation.

**Comment:** The DEIS should explore the rational expansion of the SNPLMA disposal boundary in a way that limited natural resources are considered as the driving force. The Nevada Army National Guard requests the areas identified on maps submitted with this comment be included on the map "Lands Identified for Disposal". These areas may be needed by the National Guard in the future through a Recreation and Public Purposes Act request.

**Comment:** We officially request that the Moapa Valley Open Space Study final version dated December 2009 be entered into public record. We request that the recommendations made within the study be implemented where possible as they apply to the Las Vegas Resource Management Plan revision that is currently underway.

**Comment:** Don't dispose of the 11,000 acres east of the Moapa Valley. Preserve this area as open space and for recreational uses.

## LIVESTOCK GRAZING

**Comment:** Refrain from opening and allowing grazing on allotments purchased and terminated pursuant to the Clark County Desert Conservation Plan and MSHCP.

**Comment:** My comment here is particular to Gold Butte area which has had areas removed from grazing for more than 10 years and yet there is a rancher that has continued to graze. I think it is a travesty on the public that something has not been done about this. The BLM is said to be hiding behind a possibility of rioting if the rules were enforced. While nothing is impossible I think that allowing grazing where prohibited is just making matters worse. I was told that some of the other local ranchers are angry because they do follow the rules, they do pay grazing fees. I have also heard that because the rancher in Gold Butte has been ignored other ranchers along the strip have also begun to ignore prohibited areas and have let cattle "trespass." I think the time is long overdue to address these problems, ignoring them only make it worse.

**Comment:** LIVESTOCK GRAZING: Grazing continues in the Gold Butte region. How does the BLM plan to protect the area from livestock grazing?

**Comment:** I also wish to have input on the mining and grazing rights on BLM land. I feel these uses are important to the rural way of life as well as important uses of our natural resources. To maintain those rights and even increase them in certain areas. The "cow" counties, and some rural areas of the more populated counties, especially depend on those uses of natural resources for their way of life.

**Comment:** Please stop illegal grazing from happening.

## MINERALS AND ENERGY RESOURCES

**Comment:** Establish criteria in the RMP for deciding what lands are available for application for renewable energy development. The NPS is concerned about the proposed solar development areas north of Lake Mead NRA and their potential for impacting sensitive water resources at several springs within the park.

Oil, gas and geothermal drilling and development in close proximity to the Lake Mead NRA could impact the quantity and quality of water discharging from the previously mentioned spring complexes along the north shore of Lake Mead and the sensitive species that call them home. Do not develop oil and gas in these areas.

**Comment:** We recommend the No Action alternative for renewable energy projects (wind and solar).

We request that energy development projects be removed from the fast track list in order to provide more time to examine impacts to natural resources.

Solar thermal power plants should be sited at least 50 miles from any residences.

**Comment:** The Las Vegas RMP should identify zones for all types of renewable energy development that prioritize high potential for energy development areas that contain degraded lands and are in close proximity to new transmission, while excluding sensitive conservation lands, such as citizen-proposed wilderness areas and ACECs. The RMP should also specifically preclude development outside the designated zones. Within the zones, the RMP should also set out prioritization criteria, which direct development to degraded lands and identifies other areas where development is more likely to lead to conflict, as well as setting out protective stipulations to safeguard other resources. We have provided a proposed “Sensitivity Based Prioritization for Development Areas Within Renewable Energy Zones” (attached to these comments as Appendix 2) to be used by the Las Vegas Field Office in implementing these recommendations. For off-site mitigation, BLM should provide for addressing a wide range of options to address the cumulative, far-reaching impact of renewable energy development (as set out in IM 2008-204) and should design a process to reach out to stakeholders and develop a set of conservation priorities to target in connection with off-site mitigation.

**Comment:** OCES respectfully requests that the RMP revision EIS expressly recognize that site-specific (Type I) and project area (Type II) grants for wind testing and monitoring projects proposed outside desert tortoise ACECs can qualify for the categorical exclusions discussed in IM 2009-43.

**Comment:** Place solar and wind development away from the community.

**Comment:** Incorporate mutually agreed existing policies relating to the Lone Mountain Community Pit into the RMP.

**Comment:** Control locations for renewable energy facilities so that damage to natural resources is minimized. Specifically, the solar development planned for 40-Mile Wash should not be allowed.

**Comment:** How will the revision impact the land disturbance necessary for construction and maintenance of our facilities?

**Comment:** There is plenty of land to use where the turbines could be erected and would not be an eye sore; and where roads and lands would not be closed to access in and around Searchlight.

**Comment:** Commenter has concerns about incidental take of birds at wind farms.

**Comment:** Western asks that the BLM Las Vegas recognize these facilities in the RMP revision as existing valid uses of the public lands including the right of ingress and egress, and where the possibility of replacing, upgrading, or reconstructing some or all of these facilities will continue to be allowed. As renewable energies are developed and brought to market some or all of the new generation will require

the addition of new or upgraded transmission lines to get the energy to the grid. Western may be involved in those projects because of possible interconnection needs of the new industry.

**Comment:** There is what was described to me as an overlay on the district lands, a prohibition on oil and gas exploration and drilling. On one hand the geologist said we don't know why that prohibition was put into place and on a scientific level there are people who have made inquiries about development and a certain curiosity exists about the resources. My comment here is that it would not be enough to lift the prohibition on exploration simply because of a few inquiries. Need would have to be proven and I believe we as a country already have resources in areas proven to have resources without development in So. Nevada. Look at this from the 60,000 ft view, new natural gas fields have been located in the US and further resource exploration is not NEEDED at this juncture. There are no current proven resources here in So. Nevada and to invite exploration means roads where there are none and seismic crews pressing into sensitive desert areas with an impact that I would not invite.

**Comment:** Lastly the example that I would like to convey is about the Mormon Mesa and potential development by a company called Bright Source. Bright Source would like to develop an alternative energy field on a section of Mormon Mesa but is being delayed by (among other things) old mining claims. Now rightly so these claims cannot simply be wiped out in favor of a developer, but it is also an example that once mining or development rights are granted these are not easily rescinded. In fact there is no precedent to go forward with development because of the residual claims. Therefore at this time I think the prohibition overly on resource development should be maintained.

**Comment:** As you develop amendment alternatives the BLM must work with other federal agencies to ensure there are adequate transmission corridors (both in width and number) to facilitate the various transmission facilities that will be required to convey renewable energy generated north of Las Vegas around the metro Las Vegas area to the interconnection facilities to the south of town that will allow new energy sources to be delivered to Nevada, Arizona and California in an efficient and cost effective manner.

**Comment:** There is a place for renewable energy. Place them where they are least noticeable. Renewable energy sources that provide power need power lines. Place them where they are least noticeable. Not the shortest distance.

**Comment:** For safety, old mines should be sealed.

**Comment:** Are priorities established for where renewable energy sites will be allowed, as suggested above? Will there be specific zones and will sites be contained within those zones and not dotted all over? What standard is there for water usage at the sites? Is dry cooling given preference? What are the rules for designating utility corridors? Once designated, are rights-of-way primarily granted along those designated corridors?

**Comment:** Land Use Concern: Renewable Energy Development BLM must be mindful that as we transition toward a clean energy future, it is imperative for our future and the future of our wild places and wildlife that we strike a balance between addressing the near-term impact of large scale renewable energy development with the long-term impacts of climate change on our biological diversity, fish and wildlife habitat, and natural landscapes. To ensure that the proper balance is achieved, we need smart planning for renewable power that avoids and minimizes adverse impacts on wildlife and wild lands. These projects should be placed in the least harmful locations, near existing transmission lines and on already disturbed lands.

**Comment:** Water Sustainability and Availability Water sustainability must be among BLM's policies related to solar energy development. Solar power is not renewable if it is reliant on unsustainable water use. To ensure sustainable water use, BLM must take into account water quantity and quality when designating appropriate areas for development of renewable resources. Some solar thermal plants can place a heavy demand on water resources, rendering them highly inappropriate for arid environments like southern Nevada. For example, a typical parabolic trough plant with wet cooling uses 800 gallons/MWh. Alternative technologies such as photovoltaic panels and solar thermal plants using air cooling utilize a fraction of the water necessary facility operations.

**Comment:** Geothermal energy development also faces water sustainable issues. By their nature, geothermal facilities deplete geothermal reservoirs of water, and geothermal power plants often rely on water cooled steam condensers for enhancing steam turbine efficiency because of generally lower operating steam temperatures compared with high efficiency solar thermal power plants. BLM needs to carefully evaluate sustainability of geothermal power plants relative to water supply and potential adverse impact to groundwater and surface water resources, including associated wetlands that may be down gradient of the potentially affected groundwater basins.

**Comment:** Technology is available, which can produce significant amounts of electricity using air-cooled systems. This technology uses significantly less quantities of water. The State Engineer...does not believe it is prudent to use substantial quantities of newly appropriated ground water for water-cooled power plants in one of the driest places in the nation, particularly with the uncertainty as to what quantity of water is available from the resource, if any.

**Comment:** BLM must analyze and acknowledge the limits that water availability will place on solar and geothermal development in the planning area. Thus, in determining potentially suitable renewable energy technologies for given public lands, we encourage BLM to only consider those compatible with sustainability of water resources. BLM cannot simply avoid addressing impacts to water associated with public lands by deferring to subsequent analyses and decisions made by the Nevada State Engineer in response to water right applications. BLM must take an active role in protecting waters of the public lands and their associated biological values from incompatible and unsustainable renewable energy projects.

**Comment:** BLM Solar Development Criteria Must Express Preference for Technologies that Minimize Water Use: The siting, design, and long-term operation of renewable energy plants on public lands require sustainable water use. The technology exists to conserve our water resources. The agencies can help its solar study areas limit resource conflict by minimizing their water use. Energy development planned without recognition of the legal and physical availability of water, or lack thereof, and without minimization of water use is not a viable alternative in a desert environment.

**Comment:** Parabolic trough and power tower CSP plants that use dry cooling or hybrid cooling minimize water use and are preferable in desert environments. Dry cooling eliminates 90% of the water use of wet cooling. Hybrid wet/dry cooling systems can reduce water consumption by half with only a 1% drop in electricity output and as much as 85% with a 3% drop. The hybrid system designed to maximize water conservation – a dry/wet peaking cooling system – cuts water use by 80% with modest performance penalties. Additional alternatives include concentrating PV and parabolic dish engine/Stirling systems which use negligible amount of water: 5-30 gal/MWh. These facilities are more appropriate for arid desert environments.

**Comment:** At this time, there are a number of existing and potential development proposals for renewable energy projects in southern Nevada. However, many of these proposal sites intersect with lands that are designated as avoidance areas. Almost all lands of the National Landscape Conservation System (NLCS) are generally managed as exclusionary areas for any types of ROWs. Additionally, many Areas

of Critical Environmental Concern (ACECs) are included as exclusionary areas for site ROWs. Therefore, NV Energy requests that the revised RMP take into consideration all lands not part of the NLCS, particularly ACECs, as allowable for BLM decisions to issue site ROWs. This of course presumes such developments can meet the protection of sensitive resource values in ACECs consistent with the management prescriptions for the individual ACEC (e.g. as found in BLM Information Memorandum 2009-043).

**Comment:** Therefore, NV Energy would like to work collaboratively with BLM and other linear utility providers to help identify critical corridors and longer term right of way planning methods. These critically needed corridors could then be identified and discussed in the RMP revision document.

**Comment:** Another restrictive right-of-way constraint present in southern Nevada related to new large scale renewable generation interconnection is the creation of new avoidance and exclusionary areas. These new land restrictions can pose significant challenges for the near and long range planning of linear facilities and renewable energy projects.

**Comment:** As new renewable energy generation projects are developed northwest and/or northeast of the Las Vegas Valley, these projects will require access into NV Energy's Las Vegas grid. In order to assure continued reliability, additional facilities such as transmission lines and substation expansions must be constructed to accommodate the increased capacity. However, as described in part in the above examples, there are currently no feasible routes for new transmission connectivity between 1) between the northeast and northwest portions of the Las Vegas Valley; 2) the northwest Las Vegas Valley and Amargosa Valley; or 3) the northeast Las Vegas Valley and areas to the south. As possible solutions to these three listed critical corridors, NV Energy proposes: 1) A connecting corridor across the north end of the Las Vegas valley could be designated through coordination between BLM, USFWS, Nellis Air Force Base and local governments that allows ROW access for utility facilities yet is fully protective of the area's sensitive natural resources. 2) A corridor could be provided, within the far eastern edge of the Red Rock National Conservation boundary; parallel to the western edge of the highway 95 NDOT right of way to allow transmission access between the Northwest Substation and the established DOE 368 corridor. 3) A designated utility corridor from the northeast Apex area to Eldorado in the southern end of the valley could be established. (2) Evaluation of Existing and Potential new ACEC's; In this RMP revision, Special Use Area Designations, such as ACECs, should be addressed to be more consistent with current resource issues and planning efforts. There are overlaps of special designation boundaries such as ACECs and wilderness areas where management of one designation conflicts with, or overrides, the management of the other.

**Comment:** Specifically with respect to desert tortoise ACECs, some area boundaries do not match exactly with the critical habitat areas designated by the USFWS under the Endangered Species Act. This creates a conflict with potential renewable energy projects in southern Nevada, a particular example being the Paiute-Eldorado ACEC. We note that NREL has identified a significant wind resource that intersects lands within portions of this ACEC. It is understood that USFWS-designated critical habitat is beyond the scope of this revised RMP, however, the boundary of this ACEC can be addressed under this process. Considering the adjustment of this ACEC boundary to, at a minimum, align more closely with USFWS's designated critical habitat boundary, could potentially facilitate future renewable development in the area. It is fully understood that any such project proposed would still be required to undergo site-specific analysis and review under the appropriate processes and therefore this type of realignment could be done in a way that would not adversely impact species protection.

**Comment:** A specific example where NV Energy requests an analysis of an ACEC boundary would be in the Searchlight (Paiute Eldorado) area since proposed solar and wind projects are significantly constrained by the current boundaries. Renewable developers are looking for "donut holes" of patented

lands within the ACEC, to construct the "farm" and then additional plan conformance issues are created when NV Energy applies to amend our existing transmission lines for a network upgrade to accommodate the energy. In this example, the NEPA analysis must evaluate both the private and public lands to ensure consistency and the boundaries potentially altered where warranted and feasible.

**Comment:** Proposed solar power projects should be thoughtfully planned to minimize impacts to the environment. In particular, renewable energy projects should avoid impacts to sensitive species and habitat, and should be sited in proximity to the areas of electricity end-use in order to reduce the need for extensive new transmission corridors and the efficiency loss associated with extended energy transmission.

**Comment:** Of primary concern are the impacts of renewable energy projects on listed, candidate and other imperiled species. The majority of the plans of development for solar projects to date have called for mass grading and/or vegetative clearance from the project site which could affect the desert tortoise.

**Comment:** Another concern related to renewable energy development, particularly solar and geothermal is the water needs for the development and operation of the site. Cooling for concentrated solar facilities, cleaning of photovoltaic mirrors, and water to support geothermal wells can consume thousands of acre feet every year.

**Comment:** Wind energy development impacts to birds, bats and other wildlife are well documented and could be severe if wind power development proceeds in the absence of careful planning to minimize collision impacts and habitat disturbance. Habitat impacts have received less publicity than collision impacts, although they could be as or more significant, particularly for imperiled species whose habitat is in prime wind energy production areas. Wind power facilities can directly impact habitats, via the footprint of turbines, roads, transmission infrastructure, and other support facilities.

**Comment:** We hope BLM will avoid wind energy development in areas and habitats where such development will not be compatible with wildlife habitat and other values. Roads and other linear disturbances present a particular challenge to wildlife in the form of habitat fragmentation. Continued habitat fragmentation forces wildlife to live on ever-shrinking islands of habitat, where it is more difficult for them to find food, water, shelter, mates, and protection from predators. Genetic problems such as inbreeding appear, and populations become more susceptible to catastrophic events such as wildfire. The resulting fragmented habitat inevitably leads to smaller populations of wildlife, and extirpation of populations or complete extinction of species becomes more likely.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Minimize the projects' ecological footprints.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Avoid steep slopes in order to reduce erosion impacts.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Avoid sensitive and rare natural communities.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Analyze, avoid, minimize, and otherwise fully mitigate impacts to wide-ranging species; Avoid identified wildlife corridors.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Require structures that discourage perching by raptors.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Avoid fly-ways, especially for raptors.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Avoid development of priority 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.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Avoid impacts to species of plants and animals listed under the state administrative code and the ESA.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Avoid local, state, or federally protected lands.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Minimize growth-inducing impacts.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Be consistent with the conservation priorities of existing land management and conservation plans.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Minimize impacts due to on-going maintenance of the pipelines, transmission lines, or distribution facilities.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Minimize cumulative impacts due to existing and planned development in the region.

**Comment:** We specifically request that any future renewable energy development within the Southern Nevada District address the following concerns: Actively restore native vegetation to the project footprints after the infrastructure has been constructed.

**Comment:** The haphazard nature of the BLM's right-of-way application process for renewable energy developments have led to a situation in which a comprehensive regional and landscape analysis of the impacts of these developments on species has not occurred. This RMP revision process must remedy this situation by analyzing and disclosing the present situation, as well as by identifying suitable and appropriate areas for further renewable energy development that would avoid or minimize impacts to the tortoise and other affected species. Comprehensive cumulative effects analysis must be a part of the decision making process.

**Comment:** Energy projects should be governed by rules and regulations with public hearings for each individual project.

**Comment:** Energy and minerals management: While nearly all mining is now prohibited on BLM land, renewable energy on public lands seems to have carte blanche approval. From all appearances, BLM does not consider the impact to communities when granting approval for the renewable energy projects in Clark and Nye Counties. Existing infrastructure in small communities cannot absorb the impact of large-scale renewable energy construction in and around their residential areas, and the resulting industrialization of once quiet rural areas.

**Comment:** In addition, the water usage projected for the industrial development of renewable energy is totally unreasonable for an area that is a desert.

**Comment:** Also, there are large numbers of raptors in the vicinity of Searchlight and Castle Mountains that will be heavily impacted by wind generation; i.e., golden eagles, turkey vultures, Coopers hawks, Harris hawks, red-tailed hawks, and Kestrels.

**Comment:** It is critical that developers of renewable energy and transmission lines be held to a higher standard for reclamation.

**Comment:** If the developers claim it is cost-prohibitive to reclaim the desert to its original condition, then the project should not be sited in the desert.

**Comment:** Renewable energy plants, geothermal, solar and wind should be located as close as possible to existing industrial areas and or existing power plants. Any new transmission or pipelines should be kept inside of or adjacent to existing corridors.

**Comment:** Keep the public lands surrounding Vegas Valley public and open for outdoor recreation. Much needed solar power facilities can be built further out.

**Comment:** That prior to releasing land for mining, solar or wind projects, that local communities have an opportunity to express their opinions and concerns regarding the project before a determination by BLM.

**Comment:** ALTERNATIVE ENERGY RESOURCES: I would like our land management departments to lead by example, i.e.; State and Federal Land Management.

**Comment:** No renewable energy - solar or wind be located on the Moapa Valley floor and not be visible from the Valley floor up on the edge of the mesa. No new materials (rock) mines located within view of the highway (169). The one at the southwest intersection of I-15 and 169 is an eyesore.

**Comment:** No solar should be placed in the desert.

**Comment:** Be careful about designating land that is currently used by the public for renewable resources.

**Comment:** Do not allow solar or wind energy development around the communities of Searchlight and Nelson.

**Comment:** Do not allow solar development on public lands.

**Comment:** The RMP needs to set the ground rules in a proactive manner for how BLM addresses major renewable energy projects. Create a renewable energy plan that includes a unifies map containing utility corridors and preferred energy sites. The plan would also identify areas not subject to renewable energy due to their unique characteristics that warrant protection. The plan would clearly identify what lands would be developed and what lands would not be developed for energy uses.

**Comment:** Do not develop wind and solar energy on public lands, but instead leave these areas preserved from development and open to the public.

**Comment:** Do not develop wind and solar energy around the Moapa Valley, including the towns of Overton and Logandale. Preserve these areas.

**Comment:** Lower Mormon Mesa should not be open to solar development.

**Comment:** Don't develop solar and wind energy within the viewshed of the Moapa Valley, especially along the mesa.

**Comment:** Use existing transmission corridors when developing wind and solar energy. Don't disturb Mormon Mesa.

**Comment:** Don't develop wind energy in close proximity to the town of Searchlight, especially in areas where OHV use is occurring.

**Comment:** Ensure that when solar development applications are reviewed, the best practices for conserving water and preserving open space are considered.

**Comment:** Do not allow wind development in close proximity to Searchlight.

**Comment:** Do not develop wind or solar energy around Henderson.

**Comment:** Do not put solar or wind near Jean or Searchlight. You do not permit us to mess with turtles and tortoises and make dust, but you want to take thousands and thousands of acres and turn it to use for corporations to make wind and mulch.

**Comment:** Don't allow solar or wind development on public lands.

## OHV USE

**Comment:** Allow OHV travel through areas not suitable for open OHV use by constructing and designating suitable trails around areas of habitat concern, including informational signage.

**Comment:** Develop an extensive OHV planned trail system.

**Comment:** Closely coordinate OHV planning between the RMP and RAMPs projects to ensure protection of natural resources.

**Comment:** Please reconsider the complete closure of all areas during any time of year. Create a barrier for the tortoise to keep them separated from the trails.

**Comment:** Provide more access on RS-2477 roads to washes that we can drive up to enjoy what we do.

**Comment:** Provide access to desert areas through the RMP revision for motorized user groups.

**Comment:** Please limit restrictions and land closure outside of Las Vegas. Consider opening up more roads to access areas.

**Comment:** Please consider a group of 35 vehicles or more instead of more than one vehicles requiring a permit.

**Comment:** Remove the access restrictions in commercial and public works areas for those who respect and value our land by low dust and low speed vehicles.

**Comment:** Please don't close our OHV trails.

**Comment:** Provide access for OHV use around Las Vegas, including RS-2477 roads.

**Comment:** Please do not close OHV roads near Nelson and Goodsprings, NV.

**Comment:** Provide current and correct information at the local BLM offices such as maps or someone to talk to regarding OHV use on public lands. Include specific language in the RMP indicating what is allowed on trails and roads. Clarify if permits are needed for OHV groups consisting of seven to ten vehicles.

**Comment:** Keep areas open for OHV use.

**Comment:** Create a "No Wake Zone" regarding OHV use in areas where dust control is a problem. Include a designated distance, eventually marked by signs, that would indicate a low speed or low dust area.

Provide staging areas to park OHV trailers, such as the Silver State Trail System outside of Caliente, NV.

Provide more education to the public regarding responsible use of the land with programs like "Tread Lightly".

**Comment:** Remove language in the current RMP regarding "mini events" and allow small groups of vehicles to recreate without a permit.

**Comment:** Limit OHV use to designated roads and trails in and around mesquite woodlands.

**Comment:** Provide areas for OHV use that include a diverse landscape through washes and mountain areas. Specifically, the area north of Jean and south of Enterprise, on the west side of I-15 (map provided).

**Comment:** Do not close any OHV areas.

**Comment:** Don't allow solar development at the MRAN pit in Jean, but instead leave this area open for OHV use.

Allow OHV use in desert tortoise ACECs from November through April, especially in the area from Searchlight west out to the California line, just past Crescent and south of Searchlight past Cal-nev-ari down highway 163.

Allow OHV use in wilderness areas.

**Comment:** Do not close any more areas to OHV use. Open additional areas for OHV use. Areas where OHV use needs to be expanded include the Nelson Hills and areas around Laughlin and Searchlight.

**Comment:** Allow horseback riding and hiking in the Amargosa Valley area where OHV use is restricted.

**Comment:** How will areas be set aside for competitive events that are close to Las Vegas while still being affordable for clubs? Will the cost of these events continue to increase?

**Comment:** Will open OHV areas continue to exist within the planning area? Will there be any changes to OHV riding regulations?

**Comment:** I participate in Off Road racing which drew me to the Las Vegas Area. Off Road racing is not only something recreational that my family and I enjoy doing together that lets us bond, camp and get reacquainted with nature; but it also brings a plethora of business to the Vegas Valley.

For example, without off road races in Henderson, we lost business in our local hotels/motels and also lost business in the downtown area where contingency was just last year. We all know that in today's economy, any business is appreciated, and to take away such big events really affects all of the locals in the valley. To stop Off Road racing in the summer months can really off set the local business economy, especially the restaurants, hotels and motels. Not to mention the local Off Road shops as well as auto part stores. Any Off Road races that I have been to here in the valley area have only been on trails that are already formed, not to run over any new land that has not yet been touched by vehicles. All of the patrons have been respectful, that I have seen, and have taken out everything that they have taken in. Trust me, I have seen a few people try and leave their trash, and boy did they get an ear full from the true off road enthusiasts who protested their actions until the trash was picked up.

I ask you to please reconsider the decision to close Las Vegas Valley to off road activities as it will not only hurt our economy, one of the worst in the nation, as it will also affect my family time, as well as many other families.

**Comment:** to whom it may concern as a family man whose entire family, all 32 of us, use the deserts around Nevada and the great southwest for our recreation as well as our business activities which we do pay fees directly to the BLM office(s) I would like some questions answered regarding this proposed closing of public lands that are there for our use. 1. What substantial information do you have that says that off road recreation and organized competition events prevent the desert tortoise from a normal existence in the desert around the Las Vegas area? Are these closures singling out motorized vehicle use or are they for everyone like hikers, equestrian use and mountain bikers also? 2.If these studies are available can they show any history ,buy actual count that the desert tortoise is in danger and its population is endanger ? How are these studies compiled and how accurate are they to provide information that substantiates the tortoise may be in trouble? 3. If off road use is prohibited from selected areas, how will the BLM replace the missing funding it receives from the off road community and organizations that support the BLM? Will there be an increase in taxes or will the BLM reduce its labor force to offset the loss?

**Comment:** Your decision to have the need to close the desert for recreation has me seriously concerned since it will affect my business seriously and make it more difficult for me to provide for my family. I am of the understanding that this is due to the desert tortoise. My question to you is: how many desert tortoises reside in the areas you are trying to close to racing? An exact number is requested. I know how many "takes" there were in 2009, which is what you are trying to use to justify the closures. Jean is classified by US Fish and Wildlife as a low tortoise population. I also know that you don't have an exact number or even a guesstimate of how many tortoises there are. I believe this is yet another move by the Las Vegas District BLM office to close down desert racing. This doesn't make sense since this sport brings a lot of business to the Las Vegas area and contributes to help the economy of Las Vegas. Without exact data regarding tortoise numbers, how can you possibly justify closing these areas to off-road racing?

**Comment:** I love the outdoors, and enjoy it in many different ways: hiking, driving, and OHV riding. I find that there are many opportunities for hiking and driving street-legal vehicles, but not very many for OHV riding. My OHV club and I have to go further and further away from Las Vegas to legally ride. I understand that there are many uses for the land in question, and I would like to make sure that ATV and motorcycle riding is among those considered. Through designated areas and markings, motorized vehicles can co-exist with non-motorized uses. Perhaps funds from the new off-road vehicle registration fees can be used to facilitate a trail system. The fees are new this year, but should be better established by the end of this planning process. Neighboring states have established trail systems, which have become a major source of revenue for their communities, while still maintaining and protecting the environment. Solar and wind projects are beneficial as well, but could be placed further away from the RMP planning area.

**Comment:** As an avid OHV user, I would like to see a trail system like the Paiute Trail System in Utah, here in southern Nevada. I do not believe that large areas should be open to indiscriminate OHV use and racing, as this destroys the sensitive desert, and gives us careful OHV users a bad reputation. The impact of careful OHV use on designated trails is minimal if done right, and I believe a well-designed, extensive, designated trail system will benefit OHV users as well as BLM personnel by providing access to otherwise inaccessible areas.

**Comment:** I am asking why the 40 years of documented permitted OHV events that were approved by the BLM are not included in the trail inventory? What is the need for added regulations and restrictions regarding the desert tortoise when there is no documented takes for motorcycle events.

**Comment:** There is a balance between public access and special habitat areas. I am concerned by the loss of ATV/OHV recreational opportunities in and around Southern Nevada, your area of responsibility. Silver State OHV trail is an example of cooperation between the BLM (Ely) and Off Road Enthusiast. The Paiute trail system in Utah is another example of diverse needs and wants working together. Quality planned trail systems can and should allow travel through areas not suitable for open ATV/OHV use. You can count on my help to establish such a system. Much needed solar power facilities can be built and coexist with these trails and areas. I'm sure that if BLM would scope, plan, construct, and designate suitable trails around those areas of concern, ATV/OHV riders would cooperate in protecting public lands. Education enhances the rider's outdoor experience and brings cooperation.

**Comment:** All one need do is to look North to Utah to see how to properly address the use and protection of OHV areas. That state has done it right and we are more inclined to visit Utah for our OHV adventures because they publicly embrace the importance of protecting and improving OHV riding for all. With proper protections the use of the OHV for outdoor enjoyment is unsurpassed. So, do we take our vacation dollars to Utah, or can we enjoy the outdoors more with our OHV here in Nevada where we live. One aspect which would greatly help this effort is the proper registration and licensing of our OHV's. Please direct this effort which is sorely needed to the Nevada DMV. This will also help to increase tax dollars for the future improvement of OHV facilities.

**Comment:** OHV million dollar revenues are pennies compared to the revenue generated by the solar industries. We should not be pushed out because of this. Instead BLM should provide opportunities for OHV recreation areas. Use of these BLM OHV areas will be used by recreation visitors from across Nevada, California, Utah, and Arizona. Sound management of these areas creates recreation opportunities for off highway vehicle owners, providing significant economic benefits and jobs for the communities near these facilities. Laughlin, Nelson Hills, Jean NV, Muddy Mountains, Searchlight and Mercury would all be good candidates for OHV areas as they have many miles of established sustainable trails.

**Comment:** Racing is also a vital part of the OHV community that draws a lot of entries, spectators and brings money to the state. Please do not limit the use of these areas for non factual reasons.

Limits should to be raised in Nelson Hills for permitted competitive OHV Events. Right now they allow 6 races a year but only 60 entries per event. Maybe they could raise the limit to 300+ vehicles per event. Also there are many miles of documented trails in this area. OHV competition event limits should also be raised in Laughlin area from 2 to 6 minimum or remove the limit all together.

We ask two pit areas to be established in Searchlight, NV on public lands on the east and west side of cottonwood cove road so the public can camp legally on public lands and access the hundreds of miles of OHV trails in Searchlight, NV without having to gain permission from private property owners.

**Comment:** The Nellis Dunes area needs to be vastly expanded to provide a much larger open OHV area. Also if lands are to be taken for power plants etc. then other lands should be opened to replace them. Off road users contribute greatly to the local economy and to the economies of towns all over the state.

**Comment:** I would also like the entries per event limit raised in Nelson Hills for permitted competitive OHV Events. Right now you allow 6 races a year but only 60 entries per event. Why can't the limit be raised to 200 or 300 vehicles per event? If the BLM would create some OHV ACECs then that would allow for those areas to be managed for OHV recreation.

**Comment:** There are alternate sites that are unused and already off-limits that could be utilized for solar energy development. I would encourage the BLM to establish open OHV areas and, in addition, an extensive OHV planned trail system. Quality planned trail systems provide riders challenging rides, the adventure of exploration, and the pleasure of a natural environment while protecting the public land by dispersing use and locating trails in appropriate sustainable areas. Designated trails can and should allow OHV travel through areas not suitable for open OHV use. Utah's Paiute Trails System is an example of a planned trails system.

**Comment:** Laughlin, Nelson Hills, Jean NV, Muddy Mountains, Cold Creek, Searchlight and Mercury are all areas that already have trails that would be good for OHV areas that should never get taken away from us. We should also be able to race at these areas.

**Comment:** I feel that over the last few years the amount of public land that is available to motorized recreation users has steadily decreased. I realize that the motorized users are not the only users of the land however the amount of people involved in family recreation as well as those that pay to use the land like Best in the Desert and MRAN need a place to ride.

**Comment:** It is now time to set aside multiple aces (Areas of Critical Environmental Concern) for OHV competitive events . The 1st one would be in the Jean Dry Lake Valley, this area has been used for events for over 40 years and is used by recreational OHV riders every day. The next spot set aside for a OHV ACEC would be Nelson Hills, this area has been used for close to 40 years for OHV events and recreational use. The next spot would be the Nellis Dunes surrounding areas this would allow the dunes to expand . Now unlike other ACECs, the OHV ACECs would allow OHV competitive events at all times of the year and without restrictions, costs would be lower to be more in line with surrounding states.

**Comment:** Scope, plan, construct, and designate suitable trails around those specific areas of concern, planning should include a "buffer" zone. Provide informational signage around areas of concern. Education enhances the rider's outdoor experience and brings cooperation. I enjoy the outdoors. Please allow me access to it riding my OHV. Establish OHV areas and, in addition, develop an extensive OHV planned trail system. Quality planned destination oriented trail systems provide riders challenging rides, the adventure of exploration, and the pleasure of a natural environment while protecting the public land by dispersing use and locating trails in appropriate sustainable areas. Designated trails can and should allow OHV travel through areas not suitable for open OHV use. Utah's Paiute Trails System is an example of a planned trails system.

**Comment:** Raise the rider limits in Laughlin, also Nelson Hills changing the racer limit and times of year there as well! Pabco east of the Nellis Dunes area, Dutchman's pass reopening for night races and other events, How about adding a pit area in Searchlight for all the organizations?

**Comment:** There's lots of capable GPS savvy individuals and organizations right here. MRAN (Motorcycle Racing Assoc. of Nevada) is one resource that I'm personally familiar with. Its members map courses for submittal the BLM for permitting of competitive off-road motorcycle events. They

already know GPS tracking and formatting requirements for BLM submittal. Those members would gladly volunteer to participate in compiling a trail inventory. They wouldn't have to find the trails, they know where they are.

**Comment:** I think the BLM management team should look at population growth and the growth of the popularity of off road vehicles very strongly. We have all seen the times when population growth was explosive and I think the growth of OHV use will also be explosive. Think of this possibility: we have not even begun to scratch the surface of the popularity of OHVs. Strong management practices will be needed to preserve lands that are set aside for non-vehicle use. I commend the BLM for having areas that are balanced and some that are dedicated for use by OHVs but this also leads to pressure on non-vehicle use lands as people believe that they have a right to go anywhere-anytime. Please try to find a consistent plan for special areas that should be dedicated for non-vehicle use and then find a way to monitor those who violate the rules.

**Comment:** As I understand the current RMP prohibits mini events, described as 2 or more OHVs. This should be eliminated for safety. We are all taught never go into the desert alone and this statement encourages people to venture out alone.

**Comment:** It is our hope that through this plan revision the BLM will make providing world class OHV recreation opportunities a priority by developing a comprehensive plan that will fulfill the needs of both the competitive OHV events held in the area as well as the needs of the casual OHV recreationists.

**Comment:** Unfortunately the current RMP does not include a comprehensive OHV recreation plan. It also has not formulated a comprehensive OHV compensation plan to deal with losses to this type of recreation whether that happens via proposed renewable energy projects or new Wilderness designations. We believe this issue must to be dealt with in the new RMP. A “no net loss” approach to OHV recreation land needs to be adopted within this revised plan.

**Comment:** BLM should identify OHV recreation zones. In these zones OHV recreation would be the management focus. Land identified in these zones could be owned by a government entity and/or privately held. If not already owned by the BLM they should be identified for future purchase and then used for OHV recreation opportunities. Any type of development that does not enhance OHV recreation, like renewable energy projects, should be prohibited in these zones.

**Comment:** Currently there are many renewable energy projects proposed in Southern Nevada. Most often these projects are slated for the exact same land where OHV recreation occurs. Within this plan the BLM needs to identify land that is appropriate for project applicants to purchase in order replace the loss of OHV opportunity caused by their projects. Or indentify land currently under BLM management that, with the proper environmental analysis, could be opened up to OHV use.

**Comment:** OHV Recreation Compensation Fund – The purpose of this fund is to collect money from any project applicant when an impact/loss is made to OHV trails or areas. Those funds can be used to purchase new OHV recreation property, to do the required environmental analysis to open up new trails, or to make improvements to existing OHV trails and areas.

**Comment:** We would like to see non-speed events only be required to have a Recreation Use Permit if there are over 50 participants instead of 25. The current language that protects the LA-Barstow-Vegas Dual Sport Tour needs to remain. We would like to see the number of non-speed events allowed in this area be increased during the tortoise inactive season.

**Comment:** Archeological and Cultural ACECs (not shared with other ACECs) – Allow non-speed events on trails that do not impact the sensitive resources in the area. Continue to allow non-speed events in the Red Rock Canyon NCA like LA-Barstow to Vegas.

**Comment:** Archeological and Cultural ACECs and Natural ACEC (shared with Gold Butte ACEC) – Consider designating more trails for OHV use that do not impact the sensitive resources of the area especially if there are already trails on the ground and in use but not currently designated.

**Comment:** Consider designating more trails for OHV use that do not impact the sensitive resources of the area especially if there are already trails on the ground and in use but not currently designated. Consider designating a route(s) in these areas where competitive events can be held with certain limitations that protect the sensitive resources of the area.

**Comment:** Leave existing trails, washes, and RS-2477 roads. Leave open access for OHV.

**Comment:** Having available OHV land gives OHV enthusiasts legal places to recreate. The availability of this land creates less issues with land trespassing as they have an option to legally recreate. Keeping land open for legal OHV use will keep the illegal activity as low as possible. I understand the need to dedicate for alternative energy solutions and I support it fully. Closing down already established OHV parks and land will only create more trouble for the OHV community. The OHV community is very large in Southern Nevada and plays a big role in the local economy.

**Comment:** The land use agencies should be using science and land management to accommodate the increasing numbers of OHV riders instead of closing areas because of popularity and increased use.

**Comment:** In some areas active management may well be needed because of the increasing number of OHV riders. This can be of benefit to OHVers if instead of closing large areas to OHV travel, it provides appropriate sustainable paths through them. Utah's Paiute Trail System is a good example of a designated OHV trails system. I feel an extensive designated trail system would benefit the OHV riders by maintaining and perhaps expanding recreational opportunities while preserving the natural resources of southern Nevada. Such a system already exists on the ground. Making it official is complicated, perhaps seemingly impossible because of multiple jurisdictions of agencies and within those agencies.

**Comment:** The area designations depicted on the information poster at the public scoping meetings raise some questions on what exactly are the current OHV designations. The designations on the poster are not consistent with the 1998 RMP designations. For example, there are many more wilderness areas in southern Nevada than were present in 1998. The lands within those areas are now closed to OHV use under their respective designations, so the revised RMP should address this inconsistency. Another example is the more recent closure of public lands surrounding the Las Vegas valley. The description and map presented on the district office website at describes public land closures to OHV use, however, it's not clear what process was utilized for this decision and how it conforms to the 1998 RMP designations. Additionally, this closure implies that even though these areas surrounding the valley are closed to OHV, travel on designated roads is still allowed (see the map which states, "Closure designation applies to public lands only except for designated roads."). This conflicts with the poster presented at the scoping meetings which shows the areas surrounding the valley as closed with no conditional uses allowed. The RMP should address these inconsistencies so that OHV users on public lands understand clearly what is and is not allowed within specific areas.

**Comment:** As a responsible user of public lands, it is sometimes confusing or difficult to know what OHV uses are allowed within an area because the roads are not signed, the signs have been destroyed or removed, or the RMP information isn't easy to extrapolate to a user on the ground (e.g., Map #2-10 of the

1998 RMP). It's impossible to look at white-background maps showing OHV designation boundaries when on the ground, and determine where exactly these allowable OHV uses transition from one designation area to another. I realize it's extremely costly and difficult to attempt to place signs on every designated road, signs have a tendency to disappear, and law enforcement cannot be everywhere all the time. Therefore, I would like to request BLM develop more user-friendly products of the RMP revision respective to OHV designations (see 43 CFR 8342.2(c)). One option to consider is an interactive online map that the public could use to plan activities on public lands. Other options to consider would be having the data available online for the public to download to GPS, and/or presenting the boundaries easily using Google Earth. One other option would be to have area-specific maps available to download as Adobe pdf files, similar to wilderness area maps, which show section lines, topographic background, designation boundaries and points of interest for reference. A combination of these and other methods of materials available to the public would be very helpful.

**Comment:** Would like to see the BLM be a little easier on getting off-road race permits and not at the last moment. All the race tracks that have been race on for years should still be races on in the future. Let racers pre-run the race course one week prior to the race so that the racers stay on the course better which would help the environment out. The user fee needs to be reduced to make easier for the public to enjoy their land that it is supposed to be used for.

**Comment:** I would also like to see all washes to be able to be used by OHV vehicles.

**Comment:** We also need to have renewable energy places but not where there is a race track that has been raced on for years if they do get the plants in these areas they have to suffer with the races since they were there first.

**Comment:** Four years ago, as a member of the Mesquite Kokopelli ATV club, myself and several other members of the club took the BLM maps showing roads existing before 1998 and roads developed after 1998 and traveled all of the roads to see which roads should be kept open and which one's should be closed. We marked all of the maps in great detail and submitted them to the Southern Nevada BLM district office. We have never heard any response back. I feel like we did a lot of work on this issue, on our own time to no avail, because we are still discussing it. A number of the roads that we recommended should stay open have already been closed, with no explanation or reason given. If these are really public lands then we should be given a reason as to why a road is being closed and be able to make our case as to why it should be left open.

**Comment:** Off Highway vehicles are used to see our back country. To visit areas that autos can't go. We must have marked OHV trails through the BLM. If you mark the trails, people will use them and protect the areas where we do not want to disturb. This will protect the vegetation.

**Comment:** We should have trailheads so people can unload their OHVs and leave their vehicles.

**Comment:** OHV USAGE: Certainly a hot topic at the public scoping meetings, what provisions are being made to protect public land from OHV users who figure they can ride their vehicles wherever they want to on public land? OHV usage should be limited to designated areas and routes – how can this be enforced? How can areas trashed by OHVs be reclaimed (such as effective use of volunteers working with BLM staff on “road-kill” projects)? What is being done to educate the owners and users? Can education be made a part of licensing or rental? Can licensing funds be used for education and patrols/law enforcement? Will the same standard for air pollution control devices be mandatory on OHVs as those set for autos? Can a dedicated area be set aside for OHV users other than Nellis Dunes? Should Logandale Trails be made a Special Recreation Management Area to better protect and manage that area? In designating OHV use areas, are threatened, endangered and sensitive resources given weighted

consideration? Will the BLM provide signage to indicate which trails are open to OHV use, and maintain those signs? Will designated trails be monitored periodically to detect environmental damage? We would like to see all these questions considered in further detail, so that all stakeholders, including ourselves, can develop a better understanding of impacts and tradeoffs, and decide whether they should be pursued or dropped.

**Comment:** Defenders offers the following additional planning issues for inclusion in the RMP revision: Inadequacy of existing off-road vehicle use designations on public land and associated impacts to wildlife species and habitats.

**Comment:** Land Use Concern: Off-Road Vehicle Use and Management BLM is required to manage off-road vehicle use on public lands according to Executive Orders 11644 and 11989 and regulation. See 43 C.F.R. § 8341. We recommend that BLM completely revise management strategies for the use of off-road vehicles in the revised RMP. The current management situation is not consistent with federal regulatory or statutory mandates. In reading the Record of Decision for the current RMP we find an array off-road vehicle use opportunities even within the various Desert Tortoise ACECs and designated critical habitat.

**Comment:** Executive Order (EO) 11644, as amended by EO 11989 provides clear and explicit direction to the BLM regarding the use of off-road vehicles (ORVs) on the public lands and should be followed in the planning effort.

**Comment:** The BLM must also ensure compliance with the minimization standards found in 43 CFR §8342.1. These regulations require the authorizing officer to designate ORV routes in accordance with minimization criteria.

**Comment:** In this EIS, the BLM must document its consideration of and compliance with the “minimization criteria”, including analyzing the effects of the designations. Routes can only be designated if the agency can show that ORVs will not damage or harm other resources.

**Comment:** I am writing to you today to stress the importance of OHV recreation to me and my entire family. The southern Nevada desert has a long history of providing recreation opportunities to both the casual and competitive OHV enthusiast. My family and I have enjoyed recreating in this area for many years. In recent years there has been a noticeable reduction in area available for my family to recreate.

[Southern Nevada citizens have lost recreational opportunities to urban sprawl, wilderness study and wilderness designation, areas of environmental concern, and soon, to renewable power plants covering thousands of acres. The land surrounding Las Vegas is public land. We have an outstanding opportunity to establish a belt of undeveloped land just outside town set aside for recreation. Stop disposal sale of public lands surrounding metropolitan Las Vegas and designate it for recreation. Much needed renewable power plants can be built further out.]

Since the BLM has a multiple-use mandate I feel strongly that they should include a comprehensive OHV recreation plan in this RMP revision. This plan is meant to help manage these lands for the next ten years. The needs of OHV recreation MUST be met within this new plan. The 1998 RMP does not include an OHV recreation plan and I feel that OHV recreation has suffered because of it. This type of recreation is also a high economic engine and benefits our local communities. In order to meet the OHV recreation needs of southern Nevada the BLM should consider one or all of the following:

- OHV Recreation Zones– BLM should identify OHV recreation zones. In these zones OHV recreation would be the management focus. Land identified in these zones could be owned by a government entity and/or privately held. If not already owned by the BLM they should be

identified for future purchase and then used for OHV recreation opportunities. Any type of development that does not enhance OHV recreation, like renewable energy projects, should be prohibited in these zones.

- OHV Recreation Compensation Land Bank– Currently there are many renewable energy projects proposed in southern Nevada. Most often these projects are slated for the exact same land where OHV recreation occurs. Within this plan the BLM needs to identify land that is appropriate for project applicants to purchase in order to replace the loss of OHV opportunity caused by their projects. Or identify land currently under BLM management that, with the proper environmental analysis, could be opened up to OHV use.
- OHV Recreation Compensation Fund– The purpose of this fund is to collect money from any project applicant when an impact/loss is made to OHV trails or areas. Those funds can be used to purchase new OHV recreation property, to do the required environmental analysis to open up new trails, or to make improvements to existing OHV trails and areas.

**Comment:** Large tracts should not be closed to OHV use because some area(s) therein is special habitat or otherwise inappropriate or unsustainable for OHV use. Scope, plan, construct, and designate suitable trails around just those areas of concern. Provide informational signage around areas of concern. Education enhances the rider's outdoor experience and brings cooperation. I enjoy the outdoors. Please allow me access to it riding my OHV.

**Comment:** Establish open OHV areas and, in addition, an extensive OHV planned trail system. Quality planned trail systems provide riders challenging rides, the adventure of exploration, and the pleasure of a natural environment while protecting the public land by dispersing use and locating trails in appropriate sustainable areas. Designated trails can and should allow OHV travel through areas not suitable for open OHV use. Utah's Paiute Trails System is an example of a planned trails system. You can count on my help to establish such a system.

**Comment:** That any OHV designated areas be in areas where such activity will not affect the air quality in neighboring residential areas, impact rare or unusual land formations and nearby wilderness or related designated areas.

**Comment:** While revising the current RMP please leave existing trails, RS-2477 roads and washes available to the OHV public.

**Comment:** Monitor OHV trails with a conservation group.

**Comment:** We need some designated areas of exceptional plant life, animals, scenery, but there are 1000s of mile of trails to get to these areas . Public land is for everyone and closing them off for just the environmentalists is some kind of discrimination that I am not in favor of. Please do a lot of review of the issue after all what does public mean?

**Comment:** My friends, family, and members of a local off road club would like to make it clear that we need our lands to remain accessible to us for our recreational needs and educational needs. We have a large amount of people that can't just walk out to a lot of these areas and need to be transported out, so keep our trails open.

**Comment:** I live in Logandale and as such my concerns are mostly towards maintaining access to those recreational places that are close to this area. Such as the Red Rock Trails, Gold Butte, and other areas which are in close proximity of Lake Mead. Now it is not my intention to access new areas or build new roads, but to have recreational vehicle access to those areas on existing roads and trails. Perhaps, with the

right input, to increase access to those areas but with regards to whatever impact there may be to the wildlife, vegetation, and so forth.

**Comment:** We would like to have an open OHV use area in the dunes north of the reservoir.

**Comment:** Why all the closures after the BLM said there would not be any more closures. I am talking about road and area closures.

**Comment:** We need more access to public lands for OHV. Quit closing public lands.

**Comment:** Jean Lake/Roach Lake SRMA needs to be available for OHV/races. Big Dunes SRMA needs to still be open to OHV and not be closed for solar. Keep the cold Creek Mountain Range trails open to all OHV. Designate more areas for OHV and trail use. Reopen available land as applicable for all use. Hold more public forums regarding changes. Let news agencies know of forums.

**Comment:** There should be more OHV areas in order to meet the demand of expanding OHV use.

**Comment:** Clarify the off road use areas, roads, trails, washes, etc., the current maps are confusing and in conflict. Clearly identify areas where OHVs are welcome.

**Comment:** Do not develop renewable resources in OHV use areas.

**Comment:** I would like to see much more OHV and designated racing trails in Nevada. Protect the off-roading cultural tradition in Nevada.

**Comment:** Large tracts should not be closed to OHV use. Scope, plan, construct, and designate suitable trails around sensitive areas. Establish open OHV areas and, in addition, an extensive OHV planned trail system. Please place wording in the RMP that states, "All trails, roads and dry washes are considered open or OHV use unless posted closed and shown on a map that is readily available to the public." BLM needs to properly document all existing trails, roads, and dry washes and allow the public to create on them.

**Comment:** Please incorporate the following comments into the record for the Las Vegas Resource Management Plan Revision (RMP) and Environmental Impact Statement (EIS).

1. OHV (off highway vehicle) recreation both casual and permitted (competitive) have been occurring in this district since the 1960's. At this time the BLM is considering allowing Solar and wind energy plants to be constructed on areas that have historically been used for OHV recreation; also of importance is the fact that the BLM has closed hundreds of thousands of acres in the Las Vegas district over the last 20 years and eliminated OHV use all together or in form or another and has failed to re-establish areas to replace the closed areas. According to maps published by the BLM the lands that companies have submitted to use for solar and wind energy and their requested corridors will significantly HARM the OHV recreational community unless the BLM "...establishes areas of equal size and quality to replace areas such as the Jean/Roach area, Searchlight, Mercury, Nelson Hills and Muddy Mountains for examples. The OHV communities will lose many recreational opportunities in these areas. OHV recreation is the 11th largest industry in Nevada and the current proposals by solar and wind energy and the lack of a plan to re-establish these OHV areas that will be lost will all but eliminate the 11th largest industry in the state of NV. The BLM has a duty to manage public lands for multiple-uses. The BLM has closed of hundreds of thousands of areas over the last 20 years. The BLM is now considering closing off the remaining quality OHV recreation areas in their district; this cannot be considered managing for multiple-use. It should also be noted that if the BLM grants permits to all the current solar and wind

energy sites they will also harm every other type of public land use "except green energy". Nevadan's have given up access to enough land and the BLM has an obligation to Nevadans and the American public to not allow Green Energy proposals to affect every other recreational use in the Las Vegas BLM District. I recommend that the Las Vegas BLM district use the ELY BLM District RMP and California BLM districts examples of how to properly manage a BLM district for OHV recreation and establish areas of equal size of these other BLM districts (Lucerne Valley, Johnson Valley and Chief Mountain OHV area) in the Las Vegas BLM district's boundaries; if these other BLM Districts can establish and designate significant area of public land for OHV recreation than there is no reason that the Las Vegas BLM district cannot follow the successful process of other districts.

2. There are 3 areas specifically in the Las Vegas BLM district that need changes made in the RMP to address OHV recreation. Nelson Hills area in the current RMP states that 6 races a year can be held but only 60 participants per event. This limit needs to be raised to allow for 300 participants per event, which would be realistic with today's OHV events. The public also needs the BLM to designate a minimum of 1 but preferably 2 pit/trailhead areas in Searchlight Nevada should be placed on the West side of Cotton Wood Cove Rd and should be placed on the Eastside of Cotton Wood Cove Rd. There is an abandoned gravel pit on the west side that could be used and it is already a disturbed area and on the east side there is a dry wash that is over 50ft wide and runs for well over 2 miles. Both these areas are pre-disturbed. I would suggest the areas be made equal to the areas that are designated in Jean, NV. Last the Laughlin area has thousands of miles of existing trails and currently allows for 2 races a year. The public needs the BLM to raise this limit to at least 4 but preferably 6 and raise the limit of riders to 250 to 300 per event. If the BLM would make these 3 changes it would help replace the areas that the public will lose when the BLM approves the proposed sites for Solar and Wind energy plants. Without these changes the public will lose the ability to host quality competitive permitted events and will be forced to over use the few remaining areas that permitted events are allowed. This would be a good decision for the environment and for managing OHV recreation. These changes would also ensure that Nevada and American families will continue to have quality, safe places to recreate on OHV responsibly and help preserve the 11th largest industry in Nevada.

3. I would also recommend that the BLM consider establishing historic OHV trails/routes to provide quality and responsible recreational opportunities to the public. Some ideas would be the Vegas to Overton trail, the Jean to Searchlight trail and maybe establish a trail from Las Vegas to Alamo Nevada that would tie into the already establish Silver State Trail and this would allow people the opportunity to travel off road from Las Vegas to Ely Nevada safely. As with the Silver State Trail Competitive use could be allowed as well.

4. I would also request that the 40+ years of permitted SRP event routes be included in all inventories. All permitted OHV events have to go through a lengthy environmental study process and these trails should be listed on all inventories of existing trails for the Las Vegas District. The public should also be able to have access to a comprehensive map of approved trails in the Las Vegas District.

5. I request that wording be placed in the new RMP that states, "ALL TRAILS, ROADS AND DRY WASHES ARE CONSIDERED OPEN UNLESS MARKED AND DOCUMENTED ON MAPS MADE AVAILABLE TO THE PUBLIC AS CLOSED." The BLM and other agencies have a duty to properly map and document all existing trails, roads and dry washes and no trail should be closed unless properly studied and proven through scientific data that closing the trail would benefit the public. It appears over the last 20 years that the BLM is quick to close trails, roads and dry washes by using wording in RMP's and other documents that allows them not perform accurate mapping of all existing trails, roads and dry washes. I would also request again that the BLM use all past permitted OHV routes in the inventory as these trails have already been studied and deemed appropriate for OHV recreation.

6. I would like the BLM and USFWS to provide to the public an up to date accurate count of the current Desert Tortoise populations in the Las Vegas District. In recent articles in the Review Journal I was led to believe that the Tortoise is not endangered and should be removed from the endangered species list.

7. Nellis Dunes recreation area should have its boundaries extended to the Moapa Valley Indian Reservation, Lake Mead National recreation area and 1-15. The current designation of 10,000 acres (which is almost all located inside the PM-10 dust control zone for the Las Vegas Valley) is not in a proper location for OHV recreation and is not large enough for a recreation area of a city of 2 million people. The BLM either need to increase this OHV area to the size of recreation areas in the ELY BLM district or California BLM districts that create Lucerne Valley and Johnson Valley recreation areas or create an area of proper size for a population of 2 million people that is located outside of the mandated PM-10 dust abatement areas. Also of note is the fact that Big Dune the only other open use area in the Las Vegas District is now being threatened to be closed because of an endangered species.

8. If the Las Vegas BLM creates OHV Recreational areas like many other BLM districts across America they would save tax dollars when processing SRP's (special recreation permits) and they would also allow the public that hosts these events to save money as well. Without designating these OHV areas everybody is spending dollars they should not have to spend. In California if you want to host an OHV event in Lucerne Valley all you need to do is submit a permit application and it can be approved in less than 50 hours because the event is being held in a OHV recreation area that has already been deemed appropriate for OHV events so no additional EA's, BO's, etc need to be established. The Las Vegas districts current process is expensive for the BLM and promoters and it needs to be changed to reflect BLM districts like the one that handles Lucerne Valley so everyone's time can be used elsewhere. The first step is to establish areas the same size as Lucerne Valley.

**Comment:** Please consider opening some of the closed OHV trails in the new plan. Leave the Gold Butte area open to OHV use.

**Comment:** Open areas previously closed to OHV use.

**Comment:** Ensure DD5 remains open to OHV use and open JJ2-JJ3 and JJ8 to OHV use. Ensure there are easy access OHV areas for seniors and disabled persons.

**Comment:** The revised RMP should clarify restrictions and locations for OHV use in order to protect natural resources.

**Comment:** Do not close roads to OHV use, especially for senior citizens who require easy access.

**Comment:** Please do not allow OHV use within three miles of private residences. Do not allow OHV use on all existing roads, trails and washes, but instead create specific areas and trails away from communities.

**Comment:** Ensure there is an alternative that expands motorized recreational riding opportunities.

**Comment:** I am opposed to any restrictions that may be imposed by the design, conversation or implementation of the RMP, especially when it pertains to OHV Recreation and OHV Races.

**Comment:** Allow OHV access and riding to multiple areas, not just the Nellis Dunes. Specifically, allow OHV use in the dry lake bed near Boulder City and US 95, Nellis Dunes, Logandale Trails, the area between Nelson and US 95, and the area south of Mesquite - "Gold Butte".

**Comment:** Continue to allow OHV racing on previously disturbed sites, and if possible, expand these areas.

**Comment:** Don't close areas currently open to OHV use in order to develop solar energy plants. Specific areas include Big Dunes in Amargosa. Do not close areas and trails to OHV use.

**Comment:** Do not close areas for OHV use. OHV use allows access to public lands for people with disabilities that otherwise would not have access.

**Comment:** More areas similar to the Nellis Dunes should be identified in the DEIS to focus activities into suitable areas. A heightened public education campaign must be incorporated in future OHV planning so that this user group better understands the consequences of irresponsible actions. The DEIS should identify and implement performance bonding for all special recreation permits in the district, and especially bonding for the large OHV races.

**Comment:** Provide more open space OHV use areas around Las Vegas, Pahrump and other communities.

**Comment:** Provide additional open space OHV use areas around Las Vegas, Pahrump and other communities.

**Comment:** Areas being considered for solar and wind development should be considered open to OHV use instead of energy development.

**Comment:** Allow OHV use around the Moapa Valley.

**Comment:** Allow OHV access to public lands surrounding the Moapa Valley. Do not close any more areas to OHV use.

**Comment:** Provide additional law enforcement for areas of cultural or environmental concern. Don't close roads and trails to protect the cultural resources, instead provide more law enforcement in the area.

**Comment:** Don't close historical or traditional OHV race tracks. Provide information in the DEIS showing where these historical race areas are located and use that information in developing alternatives.

**Comment:** Provide additional OHV use areas and expand the size of existing areas.

**Comment:** Provide more open OHV use areas. Open areas previously closed to OHV use. Create trails that do not dead-end, such as going up a wash and back on the same wash.

**Comment:** Allow for OHV use around Searchlight.

**Comment:** Please re-open Hell's Kitchen, Tram Mine, Bitter Spring Creek Wash, and the Sand Dunes to OHV use.

**Comment:** Please explain why Gold Butte and the Sand Dunes were/are closed to OHV use and explain why they would continue to be closed in the new plan.

**Comment:** Don't close any more roads and re-open roads that have been closed by the current plan.

**Comment:** Please provide better maps on the internet of where OHV use is permitted. The new plan should also contain better maps.

**Comment:** Allow OHV use around the community of Searchlight.

**Comment:** Re-open roads and trails surrounding Henderson for OHV use.

**Comment:** Just leave all the public lands open for everybody for all different uses. Involve the public and other agencies in developing OHV trails.

**Comment:** Re-open the Jean and Primm areas to OHV use. Don't allow solar or wind development in areas where OHV use has been closed. If a solar or wind project is allowed, OHV access should also be allowed.

**Comment:** OHV users need more OHV areas besides Big Dune. Model OHV areas after the California BLM OHV areas.

**Comment:** Preserve our freedom to access public lands with OHVs.

## PALEONTOLOGY

**Comment:** PALEONTOLOGICAL RESOURCES: The Upper Las Vegas Wash in Southern Nevada is a home of one of the largest and most scientifically significant late Pleistocene paleontological sites in the American Southwest. How will BLM protect these irreplaceable, non-renewable resources at the Upper Las Vegas Wash as well as any other paleontological sites within the planning area?

## RECREATION

**Comment:** Increase the amount of land available for recreational purposes, including development of additional facilities in proportion to the increase in population of adjacent communities.

**Comment:** Develop the dune as a managed recreational facility with user facilities.

**Comment:** Adopt a range of SRMAs and management prescriptions which provide adequate opportunities for non-motorized or quiet recreational experiences and are written to enhance the other values that ultimately contribute to the benefits and experiences of the area. BLM should use an aspirational approach which allows the agency to ensure that some level of existing disturbance does not disqualify areas which do provide a primitive experience from a decision to manage them to protect and enhance such qualities and provide this important experience.

**Comment:** Consider the feelings of ATV users and horseback riders. Control recreation areas around Moapa and allow multiple-use.

**Comment:** Work with the public to mark and develop trails for recreational uses.

**Comment:** Nye County requests that a block of land including portions of T19S, R52E, sections 20, 21 and 28 be evaluated and designated for disposal for the purpose of establishing a public shooting range.

**Comment:** Please support amd. A for using the land for a recreational shooting area.

**Comment:** I'm in favor of keeping the shooting range open for several reasons. 1. If the range is closed, the shooting public will find unregulated and uncontrolled places to practice. We all know how dangerous that can be. 2. We all know how valuable brass and lead can be when recycled. Lead bullets can be safely removed from the back stops out in the open air. That's extra funds for the range and a part time job for

some retired shooters. 3. The environmental impact is minimal if only paper targets are used but in unregulated shooting spots the trash targets are left behind. 4. Added income can be generated by "renting" a range to a club or individual for training or competition shooting.

**Comment:** I don't want public land surrounding metropolitan Las Vegas sold off for solar power development. I want that land to remain public, and be designated for recreation.

**Comment:** Closing trails is not the realistic way of managing BLM land. It's suppose to be multi-use such as biking, horseback riding, and ATV-ing, not just saved for a very small elite group of hikers! Making these closed trails available to only horseback riders and hikers leaves out a big majority of our country's population.

**Comment:** Could personnel be assigned to the area on the weekend to talk to the OHV and remind them to stay on the trails. Sometimes, explanations and education will change behavior. We have a wonderful resource in Gold Butte and we need more personnel to protect it.

**Comment:** Keep all RS-2477 roads open so we can access washes for rock crawling and low speed desert travel.

**Comment:** With the revision of this plan the BLM has the opportunity to improve the economic health of the area by enhancing OHV recreation and increasing tourism dollars to the rural areas where this recreation occurs.

**Comment:** Interpretative signs explain what you are seeing and this is why we ride. To learn about our area.

**Comment:** It would be nice to have restrooms at trailheads.

**Comment:** Local clubs can be formed to help manage, clean up, and repair trails.

**Comment:** Recreation and visitor use must be a priority. Use marked trails, Tread Lightly.

**Comment:** There is a strong need for more law enforcement on Southern Nevada BLM land. Users of motorized vehicles are destroying signs, fences, habitat, and vistas on public land. A strong law enforcement presence is needed.

**Comment:** We need more trails for hiking, horseback riding, and bicycling and we need more areas where motorized vehicles can be used. Providing this land will do much to keep these motorized vehicles out of the areas where they don't belong.

**Comment:** Educational kiosks with posters and brochures as well as emergency telephone numbers are important. Adding trail maps with locations of scenic and/or historic sites will help greatly.

**Comment:** SPECIAL RECREATIONS SPOTS: Need more recreation spots for ATVers. Please make possible place and guidelines for the industry for it does not seem to slow down. Information kiosks, bathrooms, and trash disposal is something I would like to see more of at trailheads and recreation spots.

**Comment:** TRAILS ANDTRAILHEADS: Include such amenities to surrounding communities of BLM lands. Use the trailheads as a teaching and partnering tool to enlist generations of citizens to join in your goal of teach the planet to help in your quest to all live in a world where everyone cares for the earth.

**KEEP A VARIETY OF USE AREAS WITHIN YOUR BOUNDRIES:** I really appreciate the more groomed and informative trails with plenty of markers and educational material, but I thrill at the rougher more untamed rides where we can go all day without seeing another human. Please keep and increase the accessibility to tour through the back country.

**Comment:** Keep public lands open for recreational uses, including horseback riding and OHV use. In particular, keep the Sandy Valley and Jean areas open.

**Comment:** Create a garbage facility at Big Dune in Amargosa Valley.

**Comment:** Please develop trails for senior citizens that are easily accessible and reduce safety hazards. For example, provide access to Falling Man Hike and Kirk's Grotto in the Gold Butte area.

**Comment:** Please provide opportunities for both OHV and non-motorized use. There need to be more non-motorized trails developed. One area to consider would be the Grotto in Gold Butte.

**Comment:** Please develop a hiking trail to the Grotto in Gold Butte.

## **SOCIAL AND ECONOMIC VALUE**

**Comment:** The RMP should address financial impacts from management decisions on neighboring property owners.

**Comment:** The BLM should fully address the socioeconomic and environmental impacts associated with urban development that is precluded from areas adjacent to existing city infrastructure.

## **SOIL, WATER AND AIR RESOURCES, INCLUDING WATER AND AIR QUALITY**

**Comment:** Do not isolate springs and ensure that all current and historical water developments are maintained. Specific spring locations should be identified and improved.

**Comment:** Due to the limited availability of water supplies in southern Nevada, the RMP should require that management decisions on plans of development for solar energy be based on the suitability of a particular technology for the area, and should encourage the more water efficient photo-voltaic and air-cooling technologies over water-cooling technology. The revised RMP should require solar project proponents to minimize the consumptive use of fresh water for power plant cooling by encouraging the use of alternative water supplies such as treated wastewater, where such sources are available and economically feasible to employ.

**Comment:** Allow water resource development within the Gold Butte ACEC. Allow communication facilities for Virgin Valley Water District well no. 30 located within the Gold Butte ACEC. Allow site type facilities for water within the ACEC. Allow water resource development, including site type ROWs within the Mormon Mesa ACEC.

**Comment:** Monitoring should be done and meters should be mandatory on all wells.

**Comment:** Address the impacts of climate change from the proposed action. We recommend that the EIS for this plan incorporate a landscape-level analysis of how the proposed management decisions may

contribute to or assuage climate change. The BLM must also evaluate how predicted shifts in climate may lead to an altered management regime in the future.

**Comment:** Address impacts of water resources policy and land use decisions that administratively restrict the availability of water resources for our citizens, businesses and communities. Include cumulative impacts to water in the RMP.

**Comment:** BLM should include cumulative impacts on air quality from the construction and operation of the Southern Nevada Supplemental Airport.

**Comment:** The revised RMP must account for the designation of the Las Vegas metropolitan area, including the Ivanpah Valley, as being in nonattainment status for ozone.

**Comment:** Completed hydrologic studies, including hydrologic modeling, of any and all groundwater resources to be used on any and all land to be sold or leased need to be completed, publicly released, and subjected to scientific and public review prior to any release of such lands.

**Comment:** Scientific modeling should be used to determine the human population "carrying capacity" of the region under limited groundwater constraints. Resources and populations (for all species) are subject to natural constraints. Determine the maximum human population that this region can support within locally available water resources and native species demands. Under various scenarios, determine when these maximums would be reached.

**Comment:** Water sources should be maintained.

**Comment:** WATER: The Bureau of Land Management (BLM) should include in the Regional Management Plan (RMP) how it plans to obtain needed water, whether as federal reserved water rights or water rights appropriated through Nevada water law, to protect all springs, streams and wetlands (perennial and intermittent), as well as to continue to provide water for all multiple-uses. In the RMP the BLM should quantify the amount of water necessary to carry out the BLM's mission for all multiple-uses, including healthy desert plants, wildlife, wild horses and burros, recreation, renewable energy and dust control practices. What are the rules regarding closing wells (such as Vidler Well) and are they addressed in the RMP?

**Comment:** CLIMATE CHANGE: The Sierra Club recognizes that global warming is the most serious environmental threat facing our nation and planet today. We strongly support renewable energy, sensibly done, in reducing impacts on the natural environment caused by climate change. How will the BLM deal with the impacts of climate change on public lands and resources, especially on all water-dependent species of wildlife and plants, in the short-term and in the long-term? How is the BLM planning to limit all non-climate stressors that exacerbate the impact of climate change on our ecosystem? Protecting adequate and appropriate core areas, buffer areas and connecting corridors to give plant and animal species the space to adapt as the climate changes is another important consideration. Since climate change does not recognize political boundaries created by humans, does the BLM plan to apply adaptive land management strategies in cooperation with other federal land management agencies as well as state, municipal and private land managers or owners?

**Comment:** AIR AND WATER QUALITY: We cannot live without either one; what considerations are being made to improve their quality? Will stripping vegetation for renewable energy siting cause dust both when being installed and afterwards?

**Comment:** Defenders offers the following additional planning issues for inclusion in the RMP revision: Threats to ground and surface water resources associated with certain multiple-uses allowed on public lands.

**Comment:** In addition, water may not be physically or legally available for some energy development. BLM must assemble information regarding existing water use and permitting in southern Nevada groundwater basins with potential renewable resources so that it may avoid those areas that are within over appropriated or fully appropriated basins. BLM must ensure renewable development does not further stress streams and aquifers already stressed by overuse.

**Comment:** The Amargosa Valley, located in the northwestern part of the planning area, illustrates the need for BLM to avoid land use allocations leading to water-intensive energy development in water stressed areas. The Nevada State Engineer has ruled that the Amargosa Desert hydrographic basin is over-appropriated by 18,000 acre-feet per year (afy) and applications for new water rights will be denied because they too are in excess of the perennial yield and against the public interest. As a result, annual water demand for energy development projects in the Amargosa Valley likely cannot be sustained by the water that is theoretically, but unlikely, available for purchase or lease in the basin. Id. at 19. The dire water situation in the Amargosa Valley is highlighted by additional restrictions on the ability to transfer existing water uses to energy development because of excessive water use in the basin. Specifically, this Order states that the State Engineer will deny, with few exceptions, any application to change the point of diversion of an existing ground-water right to a point of diversion closer to Devils Hole, within 25 miles of Devils Hole.

**Comment:** Additional BLM lands in Clark County, north of the Lake Mead National Recreation Area and close to Moapa Valley National Wildlife Refuge, also have little water available for appropriation. The State Engineer has ordered that “[a]ll applications pending and any new filings for the appropriation of water from the carbonate-rock aquifer system in Coyote Springs Valley (Basin 210), Black Mountains Area (Basin 215), Garnet Valley (Basin 216), Hidden Valley (Basin 217), Muddy River Springs aka Upper Moapa Valley (Basin 219), and Lower Moapa Valley (Basin 220) will be held in abeyance until further information is obtained by stressing the aquifer by those water right permits already issued to appropriate water from the carbonate-rock aquifer system.”

**Comment:** Conserve Water to Sustain Imperiled Riparian and Aquatic Resources: Intensive water use within the planning area for any land use is contrary to the public interest in protecting sensitive landscapes and imperiled species dependent on naturally occurring water resources. BLM lands covered by this RMP also support imperiled riparian and aquatic species dependent on limited water resources. Lands under consideration for energy development are located near Death Valley National Park, Ash Meadows National Wildlife Refuge (NWR), Desert NWR, Pahrnatagat NWR and Moapa Valley NWR. BLM should not site energy development in locations where its water use would threaten these public trust resources, federal reserved water rights and other protections for our nation’s wildlife. Nor should BLM consider any other land use dependent on intensive extraction of groundwater or surface water from the public lands within the planning area. Relying on the Nevada State Engineer to address water extraction issues is inappropriate for BLM as trustee of the American public for appropriate and sustainable uses of the public land.

**Comment:** In addition to evaluating the impacts of climate change on water resource availability for energy development, BLM should look at the impacts of climate change on water quality and quantity throughout the planning area.

**Comment:** Climate Change Adaptation: Climate change is proceeding at a rate at which there will be unavoidable impacts to natural systems and fish and wildlife habitat. Resilience of many ecosystems is

likely to be exceeded this century by an unprecedented combination of climate change, associated disturbances such as flooding, drought, wildfire, insects and ocean acidification, and other ongoing threats such as land-use changes, pollution, and the overutilization of resources. Current conservation priorities and past investments by federal, state, local, tribal, and private entities are at risk because of climate change. Rigorous emissions reductions will not be enough to prevent change -- conservationists need to plan new measures to help natural systems persist in the face of changing climate conditions. Climate change adaptation represents a new conservation paradigm to help species and ecosystems cope with climate change and ongoing ecological threats.

**Comment:** Also, the BLM must evaluate the sustainable capacity of the resources to support the expanded growth of these areas. Of primary concern is the level of sustainability with regards to water needs. Growing scientific evidence is making it clear that the level of groundwater needs for continued growth in Clark County is highly questionable with regards to the sustainability of the resource and impacts to the areas of pumping. This is particularly relevant to the Las Vegas Valley disposal area.

**Comment:** The BLM cannot ignore the gravity of the threat of climate change to life within the planning area, and not take a hard look at the impacts.

**Comment:** At a minimum, a description of the effects of climate change on existing conditions such as the prevalence of exotic plant species, important habitat for wildlife and habitat connectivity, the availability of water and the health of riparian areas, zones of soil erosion or vulnerability to erosion, all provide critical baseline information necessary for the BLM to determine whether public land resources can withstand any of the proposed management alternatives. Without this basic foundational information about the existing impacts of climate change on the land, and future expected impacts, it is impossible to make informed decisions about the level, location, and kind of activities the land and its ecosystems can support in the future.

**Comment:** Regarding the presence of a level of uncertainty about the precise degree of future change in climate conditions, uncertainty does not excuse the BLM from addressing this issue.

**Comment:** Given the tremendous significance and far-reaching implications of these analyses and conclusions, and the direct relevance of this information for the proposed action, the BLM must address climate change in the RMP EIS.

**Comment:** When landscape has to be artificially altered, the physical science of naturally occurring landscape mechanisms has to be considered. How does artificially altering a certain landscape affect the surrounding landscape and ecosystem?

**Comment:** Desert soil is often highly compactable and fragile while plant and animal well-being is highly dependent on the welfare of such soil. How is BLM planning to protect such soil?

## **SPECIAL MANAGEMENT AREA DESIGNATIONS,**

**Comment:** Do not create additional Areas of Critical Environmental Concern.

**Comment:** Identify long term management objectives and actions for the protection of the recreation, scenic and wildlife values of the River Mountains.

**Comment:** Eastern Ivanpah Valley should be included in the Paiute-Eldorado ACEC and managed for tortoise recovery, not developed as a solar energy zone.

**Comment:** Ensure the existing land management designations established for the conservation of listed, candidate and special status species remain intact.

Designate important bear poppy habitat in Lovell Wash (Muddy Mountains) and the Bitter Springs as ACECs for the protection of Las Vegas bear poppy and sticky ringstem.

Designate significant mesquite woodlands as ACECs.

Review and consider establishing lands associated with the Large Scale Translocation Site as part of a desert tortoise ACEC.

**Comment:** In light of the most recent ruling and subsequent action of the parties, we emphasize that the BLM can and should continue to designate new WSAs in this planning process, including the areas identified with this submission. Further, if BLM fails to fulfill these obligations, it risks violating both FLPMA and NEPA, and jeopardizing the validity of this entire planning process.

The Virgin River should be found suitable for designation under the Wild & Scenic Rivers Act; its value in this desert ecosystem cannot be overstated and must be protected.

Include protection of lands with wilderness characteristics in the RMP's management alternatives and thoroughly analyze this issue throughout the planning process. To ensure that wilderness values receive proper and sufficient attention as a critical aspect of land management in preparation of the RMP, inventory lands with wilderness characteristics (including those lands identified below as citizens' proposed wilderness), consider alternatives for protecting lands with wilderness characteristics (including for those lands currently designated as WSAs if they are not ultimately designated as Wilderness by Congress) and address wilderness character outside of WSAs as a separate and unique issue in the planning process in each section of the RMP.

**Comment:** OCES respectfully requests the BLM reconsider the assumption that site-type ROWs are incompatible with the conservation and recovery of the desert tortoise, particularly within the Eldorado Valley ACEC.

OCES proposes that, in addition to presently applicable programmatic biological opinion terms and conditions, a set of design features and mitigation for wind development (outlined in the full comment letter) within desert tortoise ACECs be required.

**Comment:** Change the current designation of Jean/Roach Dry Lakes west of I-15 from "intense recreational use" to a lesser designation more in line with the passive trail system proposed

**Comment:** Nye County requests that current ACECs be reviewed in light of recently developed data for applicability, resource importance, and management effectiveness. Nye County does not support designating any portion of the Amargosa River within the Planning Area as a Wild and Scenic River.

**Comment:** The revised RMP should designate the Airport Environs Overlay District as a special management district.

**Comment:** Will the Gold Butte area continue to be managed as a Critical Use Area?

**Comment:** In addition to the RMPs, has the BLM Las Vegas District developed special management plans for ACECs or individual ACECs? I'm particularly interested in any site specific plans related to Big Dune.

**Comment:** The existing Areas of Critical Environmental Concern (ACEC) were designated based on information available before 1998. Much new information has become available on habitat usage, population sizes, federal regulations, and protection status needs for areas throughout southern Nye County. This new data should be used to evaluate the effectiveness of the existing ACEC designations. For example, how effectively the Big Dune ACEC designation and acreage has protected the three endemic species for which the area was originally approved. Nye County requests that current ACECs be reviewed in light of recently developed data for applicability, resource importance and management effectiveness. In this regard, the County will provide data to the BLM for consideration during the RMP update.

**Comment:** Nye County does not support designating any portion of the Amargosa River within the Planning Area as a Wild and Scenic River.

**Comment:** Here in the area of Mesquite, we have one group and one person in particular, who would like to make the Gold Butte area a wilderness area. The Gold Butte area is very beautiful and has a lot of unique geological areas. This would be a crying shame to designate this wilderness and limit the public's use of this area.

**Comment:** ACECs: Management plans for all existing Areas of Critical Environmental Concern (ACEC) should be written, implemented and enforced. If any additional ACECs are proposed, will they be able to be part of the revised plan? The Nevada Natural Heritage Program publishes an ecological scorecard of high priority conservation sites, based on its extensive database of rare plants and animals in Nevada. Many of these sites occur on public lands in the planning area. The latest report (2006) can be found at: <http://heritage.nv.gov/reports/scor2006.pdf>. We would recommend that the BLM consider ACEC designations for these otherwise unprotected sites or assemblages of rare, at-risk species in the RMP planning area.

**Comment:** WILDERNESS CHARACTERISTICS: Is an inventory planned by the BLM to measure wilderness characteristics? Are lands that have been released from WSA designation included in such an inventory?

**Comment:** All current and existing ACECs should be maintained in their current status. We also propose that you consider establishing new ACECs in the following areas:

- Upper Las Vegas Wash – This area was included and described in the “Scorecard 2006” as an area with the highest priority conservation values in the state by the Nevada Natural Heritage Program (“Heritage”). Its outstanding significance, having a high population of globally imperiled species and high quality habitat; The area provides important habitat for the Las Vegas bear poppy and buckwheat, Merriam’s bear poppy, Parish phacelia, and desert tortoise. It was rated a highest priority site for: risk of being immediately threatened by severely destructive forces; loss or irretrievable degradation of populations could occur within one year without new or on-going annual management.

**Comment:** We also propose that you consider establishing new ACECs in the following areas:

- Apex – This area was included and described in the “Scorecard 2006” as an area with the highest priority conservation values in the state by Heritage. Its outstanding significance, having a high population of globally imperiled species and high quality habitat; The area provides important habitat for the Mojave gypsum bee, Las Vegas bear poppy, banded Gila monster, rosy two-toned beardtongue, and desert tortoise. It was rated a highest priority site for: risk of being immediately

threatened by severely destructive forces; loss or irretrievable degradation of populations could occur within one year without new or on-going annual management.

**Comment:** We also propose that you consider establishing new ACECs in the following areas:

- Big/Lava Dunes - This area was included and described in the “Scorecard 2006” as an area with the highest priority conservation values in the state by Heritage for its outstanding significance, having a high population of globally imperiled species and high quality habitat. The area provides important habitat for the large Aegialian scarab, Big Dune Miloderes weevil, and the Giuliani’s dune scarab. It was rated a highest priority site for: risk of being immediately threatened by severely destructive forces; loss or irretrievable degradation of populations could occur within one year without new or on-going annual management.

**Comment:** We also propose that you consider establishing new ACECs in the following areas:

- Pahrump Valley - This area was included and described in the “Scorecard 2006” as an area with the highest priority conservation values in the state by Heritage for its outstanding significance, having a high population of globally imperiled species and high quality habitat. The area provides important habitat for the halfring milkvetch, Pahrump Valley buckwheat, Darin buckwheat, Amargosa buckwheat, Parish phacelia, Pahrump silverscale, and banded Gila monster. It was rated a highest priority site for: risk of being immediately threatened by severely destructive forces; loss or irretrievable degradation of populations could occur within one year without new or on-going annual management.

**Comment:** We also propose that you consider establishing new ACECs in the following areas:

- Toquop Wash - This area was included and described in the “Scorecard 2006” as an area with the highest priority conservation values in the state by Heritage for its outstanding significance, having a high population of globally imperiled species and high quality habitat. The area provides important habitat for threecorner milkvetch, straw milkvetch, Nye milkvetch, Beaver Dam breadroot, Las Vegas buckwheat, sticky buckwheat, and banded Gila monster. It was rated a highest priority site for: risk of being immediately threatened by severely destructive forces; loss or irretrievable degradation of populations could occur within one year without new or on-going annual management.

**Comment:** We also propose that you consider establishing new ACECs in the following areas:

- Ivanpah Valley-Hidden Valley-Jean Lake-Roach Lake – This complex of ecologically similar sites provides the core habitat for the white-margined penstemon. Smaller populations are found in southern Nye County, eastern California and northern Arizona. The proposed complex, being the largest and most centrally located of the population locales may be very important for providing connectivity for ecosystem functions, including gene flow, and ultimately for the species long term survival. It is ranked by Heritage as imperiled.

**Comment:** We also propose that you consider establishing new ACECs in the following areas:

- Mesquite/catclaw woodlands - Mesquite-dominated communities typically inhabit the edges of large watercourses such as rivers and perennial streams, but they can also be found growing in scattered clumps on sandy hummocks and near desert springs as well (Figure 2- 13). Catclaw-dominated communities occur along intermittent streams and sandy washes in both the Mojave and Sonoran deserts. The mesquite/catclaw ecosystem provides habitat for 11 Covered Species

and 5 High Priority Evaluation Species of the Clark County Multiple Species Habitat Conservation Plan (“CCMSHCP”), of which the BLM, through a memorandum of agreement, is a cooperating agency partner.

Mesquite/catclaw is widely scattered across Clark County, occurring along the Virgin and Muddy Rivers, Las Vegas Valley, Sandy Valley, Piute Valley, Eldorado Canyon, and Laughlin. Of the total of 21,700 acres of mesquite/catclaw habitat, 58 percent is managed by BLM (undesignated, WSA, and conserved habitat).

As part of the CCMSHCP, the BLM agreed to implement certain conservation measures to protect the mesquite/catclaw ecosystems. Among the 41 separate measures were ones agreeing to:

- “Inventory and monitor mesquite and acacia habitats in the Amargosa Valley area, Stump Springs, Pahrump Valley, Hiko Wash, Piute Wash, Meadow Valley Wash, and other areas determined to be important as resting and/or nesting habitat for resident and neo-tropical migrants (birds).”
- Monitor water table levels at Pahrump, Moapa, Stewart Valley and Stump Springs mesquite woodlands.”
- “Monitor water resources including springs, seeps and streams to access condition and trend.”
- “Manage public lands adjacent to the Ash Meadows ACEC and Moapa National Wildlife Refuge to compliment spring and aquatic habitat for species status species, including projects that may affect ground water levels or spring flows.”
- “Determine water needs to meet management objectives. File for appropriate water rights on public and acquired lands in accordance with the State of Nevada water laws for those resources that are not Federally reserved.”
- “Designate significant mesquite woodlands as ACECs. The management of multiple-uses within mesquite woodlands will be consistent with managing for the long-term viability of these habitats and the wildlife they support.” (emphasis added).

The Piute Wash, Hiko Spring, Boat Tank Spring and Christmas Tree Pass Road areas are also identified by the National Audubon Society as “Important Bird Areas” (“IBAs”) in Nevada. Audubon describes IBAs as, “Important Bird Areas, or IBAs, are sites that provide essential habitat for one or more species of bird. IBAs include sites for breeding, wintering, and/or migrating birds. IBAs may be a few acres or thousands of acres, but usually they are discrete

**Comment:** We also propose that you consider establishing new ACECs in the following areas:

- South WeeThump Joshua Tree – The area south of the existing WeeThump Joshua Tree Wilderness is a non-protection portion of Audubon’s Wee Thump Joshua Tree Forest IBA. Nest cavities are one resource that are almost exclusively absent from desert sites, and it is this resource that makes Wee Thump unique. The ancient Joshua trees, many estimated to be over 250 years old, offer cavities and there is a unique guild of cavity nesters at the site. The cavities not only provide important nesting opportunities but offer winter refuges for certain bird species as well.

**Comment:** Oasis Valley – While there are significant private lands in Oasis Valley, the majority are BLM public lands. These lands provide refuge and habitat for the Amargosa toad, a species petitioned for listing under the ESA. Oasis Valley is also an Audubon IBA. For migrating birds between the Mojave Desert and the Great Basin, Oasis Valley is one of the rare routes that guarantee water. The only alternative is Pahranaagat Valley to the east. Theoretically, all land birds migrating into the Great Basin and other locales to the north, must pass through these two corridors. The Amargosa River, numerous

springs, wetlands and farm ponds support an important flyway and a riparian corridor. These riparian corridors are surrounded by typical upland transitional vegetation of the Mojave and Great Basin desert scrub ecotones.

**Comment:** Any newly established ACECs should have mineral rights withdrawn, and federal water rights protected to ensure their integrity and site characteristics.

**Comment:** Please include a map of the proposed ACECs and other special designations and the resource values associated with that area to justify the management decisions.

## THREATENED AND ENDANGERED SPECIES

**Comment:** Include objectives in the plan for coordination with the Lake Mead NRA regarding rare plant management.

**Comment:** Evaluate the BLM's list of sensitive species and incorporate information regarding species status, distribution and rarity gained since 1998 in the amendment.

**Comment:** Identify, monitor and protect truly native species, so that population declines can be addressed well before the species is threatened.

**Comment:** WILDLIFE HABITAT: How will the BLM protect and conserve habitat for the myriad of desert animals and plants which are not yet listed under the Endangered Species Act? What plans are there, and are they being enforced, to protect the plants and animals currently on the list?

**Comment:** Defenders offers the following additional planning issues for inclusion in the RMP revision: Inadequate conservation of public land habitat supporting important Desert Tortoise populations occurring within and outside of designated Areas of Critical Environmental Concern.

**Comment:** 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. The current RMP is not only challenging to obtain, but difficult to read and comprehend in a reasonable period of time. There does not appear to be any maps summarizing the occurrences of Special Status Species and other species of special concern or high value on public lands within the planning area, and no maps that clearly show what lands are allocated for long-term and effective conservation as ACECs or wildlife habitat management areas. Lands allocated for such conservation must also be accompanied by area-specific protection measures that are immediately applicable and fully effective in achieving management goals.

**Comment:** Strengthening protection of habitats that sustain Special Status Species must be immediately effective in preventing the continued decline of species populations, and habitat quality and quantity. Clear, concise and effective policies that stabilize, protect and enhance habitats for these species are necessary. We urge BLM to strengthen public land habitat protection for all BLM 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. We also urge BLM to refrain from adopting policies that claim to address these issues, such as monitoring and use of adaptive management, which in reality merely allow the current situation of habitat loss and degradation to continue.

**Comment:** Desert Tortoise: The Desert Tortoise recovery ACECs designated by BLM in the existing RMP (Piute-El Dorado, Coyote Spring, Gold Butte, and Mormon Mesa) are extremely important conservation designations. These areas should continue to be fully excluded from land use activities that

would destroy or adversely impact natural habitat. We strongly urge BLM to increase the size of the Desert Tortoise ACECs to correspond to critical habitat which was designated by the U.S. Fish and Wildlife Service in 1994.

**Comment:** In addition, the revised RMP should include strong habitat protection provisions for habitat that occurs outside of designated critical habitat and ACECs. We find that the RMP lacks conservation provisions for Desert Tortoise habitat outside of the ACECs. This shortcoming needs to be corrected. Stable populations of Desert Tortoises occurring outside of ACECs and outside of critical habitat are important components of the overall Mojave Population. Although these populations may be lower density than those generally occurring within ACECs or critical habitat, they nevertheless are essential to the overall viability of the greater population over time.

**Comment:** We recommend that within all ACECs, all Desert Tortoise Critical Habitat, and all habitats supporting Special Status Species, BLM restrict off-road vehicle use to designated routes of travel; prohibit organized recreational events involving more than 25 vehicles; and prohibit all competitive events. The RMP should also contain a procedure that BLM will use comply with legal and regulatory requirements as they relate to off-road vehicle route designation. This procedure should include both the analytical and implementation procedures that will be used.

**Comment:** It is especially important for BLM to provide proper levels of protection to habitat supporting Desert Tortoise populations that occur outside of designated critical habitat or Desert Tortoise ACECs. These areas, including linkage habitat between critical habitats or recovery units, are essential to the long term health and resiliency of this threatened species. We strongly urge BLM to include these areas in zones that limited off-road vehicle use to designated routes of travel. In all the above areas we urge BLM to eliminate off-road vehicle use in washes. Washes are generally high in biological resources values because they concentrate seasonal water flows and runoff, support greater diversity and abundance of plant species, including Desert Woodlands, and correspondingly higher animal species populations. Washes are often favored habitat areas for species movements, nesting and cover.

**Comment:** The analysis must include information regarding the current status, population trends, or effects of current management on species protected under the Endangered Species Act (“ESA”), candidates for listing, or species imperiled and protected by the State of Nevada or under the BLM’s directives contained in Manual 6840.2 regarding BLM sensitive species.

**Comment:** The BLM should complete inventories to fill any gaps in its knowledge of special status species and periodically re-inventory populations to determine status and trends. A goal of the BLM should be to ensure the conservation and recovery of threatened and endangered species, special status species, and designated critical habitat within the resource area. BLM should designate protected activity centers around known species. BLM should manage visitation and use, particularly motorized, by limiting activities and closing certain areas to prevent impacts (i.e., theft and disturbance) to sensitive species.

**Comment:** Now BLM has flip-flopped and is permitting destruction of large swaths of their habitat, with no sound plan for mitigation, throughout this part of the state. Specifically, the areas around Primm, the areas near the Castle Mountains, and the area around Searchlight, which have all been targeted for large-scale renewable energy projects, are home to desert tortoises.

**Comment:** Every effort should occur to provide habitat preservation for special status species.

**Comment:** An increase in solar development in the Amargosa Desert may lead to declining water levels at Devils Hole and adverse impacts to the Devils Hole pupfish.

## VEGETATION

**Comment:** Facilitate opportunities for cooperation of restoration activities in the area of weed management and disturbed lands restoration with the NPS, USFWS and the USFS.

**Comment:** Please preserve large intact areas of creosote-bursage scrub from renewable energy development.

**Comment:** Continue to help with Tamarisk removal along the Muddy River down to I-15.

**Comment:** How will restoration be addressed in the RMP revision?

**Comment:** I don't understand why places have been closed to vehicle access because of some plant in a dune that has survived centuries of wind-blown sand that shifts daily of which can cover and kill the plant. Somehow seeds grow and the plant species survives. Vehicles have run these dunes for 60 years and the plant lives on.

**Comment:** Existing activities that are destructive to ecosystems, native flora and fauna, need to be constrained to existing areas of such activities, and must be well regulated.

**Comment:** All previous restoration attempts need be reviewed, and determinations made as to their efficacy, before further decisions are made conditioned on restoration. Find out what has worked, what has not.

**Comment:** MESQUITEWOODLANDS: Mesquite woodlands or bosques only occur in Nevada in the Las Vegas RMP planning area. Most occur on public lands and are not protected by wilderness or other designations. Mesquite woodlands are extremely valuable to a number of declining bird species, including Phainopepla, and generally indicate shallow groundwater tables. Threats include proposed groundwater withdrawals for municipal or domestic uses and by proposed energy developments. Is the BLM to studying how to protect these sensitive and valuable habitats and including them in the RMP, either through ACEC designation or other approaches?

**Comment:** Reclamation of disturbed areas should be conducted with the "biggest bang for the buck" philosophy.

## VISUAL RESOURCES MANAGEMENT (VRM)

**Comment:** Manage lands adjacent to the Lake Mead NRA for the highest level of protection for their viewshed values. Consider managing lands adjacent to wilderness as VRM Class II in order to provide a visual buffer for those untrammeled wilderness lands. In particular, the scenic qualities along the Northshore Road within Lake Mead NRA encompass lands of extraordinary scenic qualities. This area includes the Muddy Mountain Wilderness and the Bittersprings Valley Scenic By-Way.

**Comment:** Renewable energy projects that present substantial impacts to visual resources should be avoided, especially those adjacent to National Park units and Wilderness Areas.

**Comment:** Ensure that scenic value is a resource that is conserved and establish clear management direction describing areas inventoried and possessing high scenic importance with clearly defined objectives that limit surface disturbance within important viewsheds.

**Comment:** We respectfully request that the RMP revision adopt at least a Class III VRM management designation for the Class II VRM inventory lands located within and surrounding application NVN-82729.

**Comment:** Keep the viewshed open for the community of Moapa. Do not allow wind and solar development within the viewshed of the community.

**Comment:** BLM should amend the visual resource management class for the Ivanpah Valley from the existing VRM Class III to VRM Class IV in order to be consistent with the Congressional directive to construct and operate a commercial service airport in the Ivanpah Valley.

**Comment:** Scenic is subject to housing tracts that don't seem to have much zoning and has both a daytime and a night time visual impact where by contrast the ACEC is undeveloped. I think this undeveloped ACEC area is very important. Mesquite has grown but some of what is valuable is the undeveloped vastness of the desert. Please try to protect these viewsheds.

**Comment:** VIEWSHEDS: Are viewsheds being placed into consideration when plans are considered, both from highways/roads and trails? Viewshed classification can be highly subjective. How does the BLM plan to quantify such subjective elements in order to classify viewsheds?

**Comment:** Because Congress has assigned special designation to so many lands in southern Nevada since the 1998 RMP, the visual resource classification of certain BLM lands is in conflict. NV Energy understands a Visual Resource Inventory was conducted in 2007 and will be incorporated into the revised RMP process. We ask that the revised RMP address the existing visual resource classes within designated utility corridors and linear ROWS to ensure compatibility with the policy as well as the intended use of such corridors.

**Comment:** As near as I can tell, the entire area around Searchlight is at the lowest visual resource category designated by BLM. This should be upgraded to protect the existing views of Lake Mohave, Spirit Mountain (which is listed on the National Historic Register) and the other mountain ranges in the region, from the haphazard development by companies jumping on the renewable energy bandwagon for the tax breaks and lucrative rebates.

**Comment:** While BLM cannot control light pollution created by encroaching urban sprawl in non-BLM managed areas, we may ask how BLM is planning to manage light pollution created by BLM's multiple-uses, such as utility scale renewable energy projects and 24-hour mining operations, located or proposed in the planning area. How is BLM planning to protect plants and animals from such artificial lighting?

**Comment:** KEEP LIGHT POLLUTION TO A MINIMUM. We all need to be considerate of the excess light that goes NOWHERE and is wasted into the night sky. Provide wonderful opportunities on your public lands and be the ones to give the gift of the night sky to generations who have NEVER had the chance to look up and see the magic.

**Comment:** Our community through the Moapa Valley Open Space Study would request that the entrance to the valley south off I-15 down Highway 169 be managed as a Class I or II area to maintain the visual look of a rural area as you come into the valley the hills would be undisturbed until you top the rise where you see current development. Gravel pits, etc. could be located behind the hills so they are not visible from 169.

**Comment:** Consider managing lands in the Amargosa Desert, between the Funeral Mountains and the Amargosa River as Class II VRM management instead of the current Class IV designation.

**Comment:** A comprehensive look at visual impacts should be considered when the BLM reviews and development plans on public land in Nevada and nationally. All facilities should have shields placed on all lights. This would be an enforced condition of approval of all projects. The BLM should consider the Mojave Southern Great Basin RAC's policy statement on dark sky lighting. All projects should utilize appropriate lighting, utilize building materials, colors and site placement that are compatible with the natural environment, and utilize proactive measures to site new ROWs.

## WILD HORSES AND BURROS

**Comment:** Consider returning wild horses and burros to southern Nye County.

**Comment:** Scientific modeling should be used to determine the "carrying capacity" of the region under limited groundwater constraints. 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. Under various scenarios, determine when these maximums would be reached.

**Comment:** Re-activate the Muddy Mountain Herd Area and return it to HMA status. Re-evaluate HMA status for the Eldorado HMA. Re-evaluate the "core management area" of the Nevada Wild Horse Range (NWHR). With respect to wild burros, the current land use plans fail to identify that the NWHR will not be managed for burros.

Continue these objectives for wild horse and burro management in the current RMP: WHB-1- d, WHB-2, WHB-2-c, WhB-2-e, WHB-2-g. In addition, design water developments for wild horses to reduce conflicts with bighorn sheep, negotiate land transfers with USFS and NPS for critical habitat components, do not reduce acres of historic herd area habitat, expand HMA boundaries, do not fence or restrict access to water sources, provide mitigation measures to increase water availability, provide legal descriptions of all Herd Areas, provide alternatives that issue sufficient forage and provide critical habitat to support self-sustaining genetically viable herds.

Provide more scientific data on why management decisions are made for wild horses and burros, including more detailed maps, condition of resources, and monitoring data.

**Comment:** Stop rounding up wild horses.

**Comment:** Commenter is concerned about the management of wild horses.

**Comment:** I think the BLM should do NOTHING about wild horses and burros, nature does a much better job.