

Chapter 2

Description of Alternatives

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CHAPTER 2

DESCRIPTION OF ALTERNATIVES

2.1 INTRODUCTION

The National Environmental Policy Act (NEPA) requires that an Environmental Impact Statement (EIS) consider a reasonable range of alternatives to implementing a proposal and to also consider taking no action on a proposal. Reasonable alternatives are those that are practical or economically and technically feasible to implement. An alternative that conflicts with federal law does not necessarily make it unreasonable but such conflicts must be considered. An alternative outside the scope of what Congress has approved is still evaluated if it is reasonable because the EIS serves as the basis for modifying the Congressional approval or funding in light of the goals and policies of NEPA [40 Code of Federal Regulations (CFR) §1500.1(a)]. The No Action Alternative is required by NEPA to provide a baseline for comparison of the impacts of other alternatives included in the analysis, even when the No Action Alternative may not be implemented based on legal, regulatory, or other considerations, including a legislative command to act. The analysis of alternatives provides decision makers and the public with information to support selection of an action that avoids or mitigates environmental impacts while meeting the purpose and need for the proposal.

This chapter contains the descriptions of the alternatives to the land disposal action that are evaluated in the EIS. The process used to develop the alternatives and the alternatives considered but eliminated from further analysis are also presented in this chapter. Table 2.7-1 presents a summary and comparison of the impacts resulting from implementation of the alternatives.

2.2 DEVELOPMENT OF ALTERNATIVES

The alternatives evaluated in this EIS were developed based on the requirements of the Southern Nevada Public Land Management Act of 1998 (SNPLMA), as amended by the Clark County

Conservation of Public Land and Natural Resources Act of 2002 (Clark County Act). The SNPLMA authorized the Bureau of Land Management (BLM) to address concerns over federal management of interspersed lands in an urbanizing area and to dispose of these federal lands in Clark County consistent with community land use plans and policies. The Clark County Act amended SNPLMA to expand the disposal boundary area to address the continuing rapid increase in the growth of Las Vegas and demand for land for development.

The Proposed Action was developed to strictly comply with the requirements of SNPLMA and the Clark County Act. All BLM lands within the disposal boundary area would be available for disposal unless the disposal would violate a law, such as the Endangered Species Act. A review of Master Title Plats maintained by BLM identified 46,701 acres of federal land within the disposal boundary area that would be available for sale or transfer to the holder of a lease issued under the Recreation and Public Purposes Act. The rates of disposal and development were determined based on the rates of previously disposed lands. The type of development and use that would occur after land disposal was projected using existing land use plans. The average distribution of land uses in the region was used to project land uses for the BLM lands within the disposal boundary area that are not included in local land use plans.

Under the Proposed Action the BLM would continue to implement realty actions such as issuance of right-of-way (ROW) grants, permits, and recreation and public purposes (R&PP) leases. The annual rate of R&PP leases and ROW grants issued was determined by reviewing the number issued since 2001. It was determined that approximately 0.8 percent of available land is leased for R&PP uses and 2.5 percent of land is covered by ROW grants each year.

The Conservation Transfer Alternative was developed to meet the requirements of SNPLMA and the Clark County Act while protecting sensitive

environmental resources. Field surveys were conducted to identify the presence of sensitive biological, cultural, and paleontological resources on BLM lands within the disposal boundary area. The survey results indicated that special status plant species, cultural resources, and unique paleontological resources are predominantly located in the vicinity of the Upper Las Vegas Wash. The Conservation Transfer Alternative was developed to provide protection for these sensitive resources while continuing to dispose of lands as directed by legislation. This alternative considered the fact that the Upper Las Vegas Wash is a natural drainage that precludes development of many acres due primarily to the natural deep cuts in the valley floor. Approximately 5,000 acres of land would be within the Conservation Transfer Area. The rate of disposal and development, and the type of development and use that would occur on transferred lands were determined using the same approach described for the Proposed Action.

The No Action Alternative was developed based on the continuation of BLM's management of lands as stipulated in the 1998 Las Vegas Resource Management Plan (RMP) and Final EIS. The RMP/EIS analyzed the impacts resulting from the disposal and development of approximately half of the acres identified as the Las Vegas Valley Disposal Area in the RMP. Under the No Action Alternative, no additional lands within the disposal boundary area defined by SNPLMA or the area expanded by the Clark County Act would be sold or transferred during the remainder of the RMP planning period, which continues through 2018.

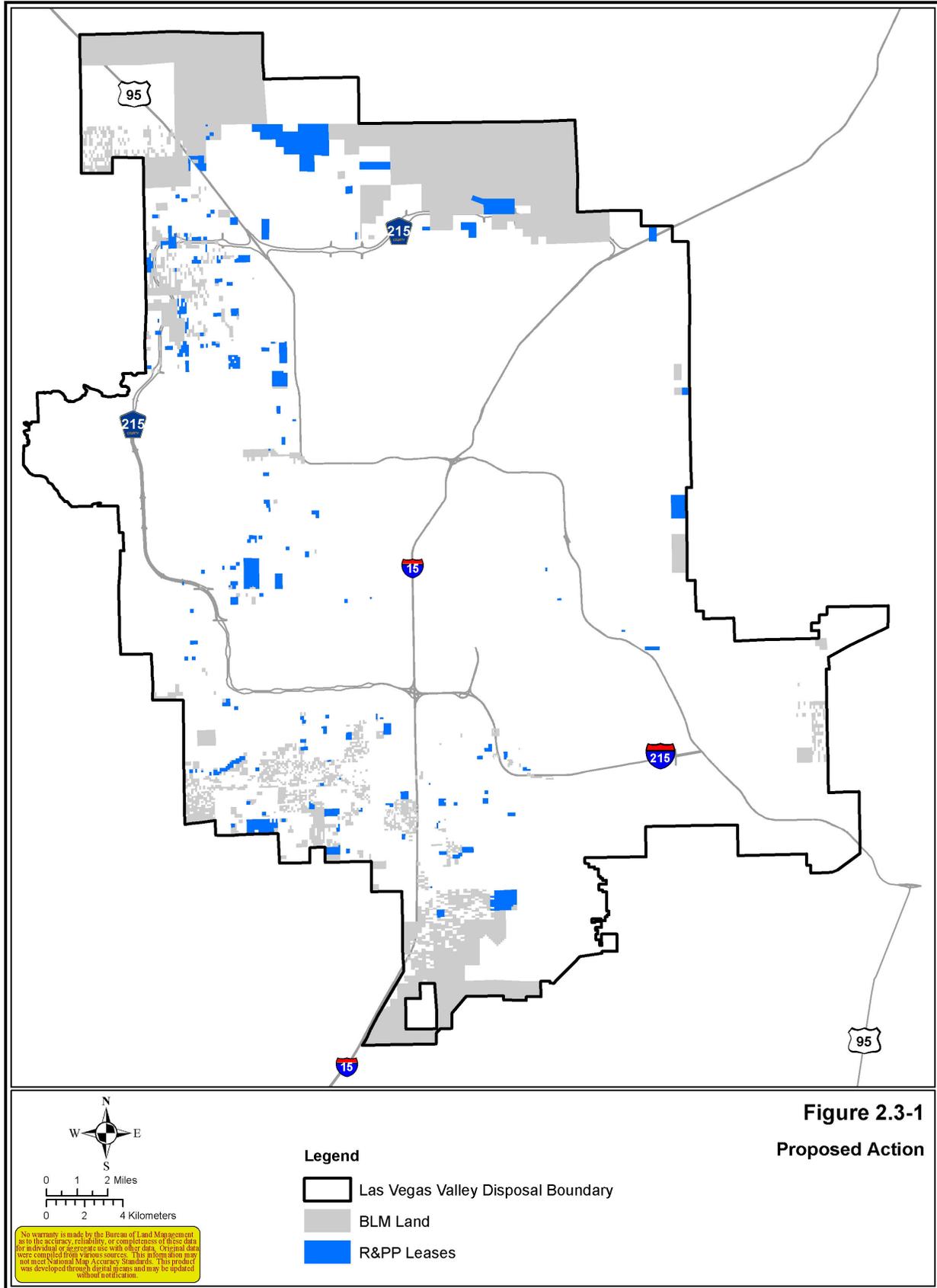
The Preferred Alternative is the alternative which would fulfill the BLM's statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors such as legislation. According to 40 CFR §1502.14(e), a preferred alternative is presumed to exist unless another law prohibits the expression of such a preference. The BLM will identify in the Final EIS the agency's preferred alternative based on the Draft EIS and the public and agency comments.

2.3 PROPOSED ACTION

The SNPLMA, as amended by the Clark County Act authorizes BLM to dispose of lands within the specified disposal boundary area in the Las Vegas Valley, using the mechanisms provided for in the Federal Land Policy and Management Act (FLPMA). The SNPLMA requires the BLM to select lands for disposal based on consultations and nominations by local governments, consistent with community land use plans. Once lands have been identified for disposal, local governments are notified and allowed to acquire land for public purposes prior to offering the nominated parcels at public auction. Lands acquired by local governments or private individuals through auction are transferred in full title and the BLM retains no ongoing interest or rights to the transferred property.

Under the Proposed Action, all BLM land within the disposal boundary area would be available for disposal unless the transfer would violate a law, such as the Endangered Species Act. There are 46,701 acres of BLM land remaining within the disposal boundary area that would be available for transfer (see Figure 2.3-1). Of this amount, the BLM estimates that 40,232 acres are available for transfer or sale under SNPLMA after the lands leased and reserved for R&PP purposes are removed. The annual average rate of land sales that has occurred under the 1998 RMP has been used to project the amount of time required to dispose of the remaining land. On average, approximately 4,000 acres of land per year are expected to be auctioned with disposal being completed by 2015. Approximately 1,330 acres per year of disposal lands would be developed resulting in slightly less than 20,000 acres of new development through 2018.

The SNPLMA does not impose a limit on the amount of BLM lands available for auction annually; the amount is based on the demand by the local governments to include parcels in the nomination process. Historically the rate has averaged 4,000 acres per year since the first auction in 1998; however, it is anticipated that upwards of 10,000 acres may be nominated for auction in each of the next couple of years. This greater amount is primarily because of the market interest



in large contiguous tracts of land for development and the estimated land values.

The BLM would continue to implement realty actions to support the transfer of land and orderly development in the disposal area, consistent with community land use plans. Realty actions include the issuance of ROW grants and R&PP leases. There are 6,469 acres of land within the disposal boundary area held or reserved by public entities and nonprofit organizations for R&PP leases. Under SNPLMA these leases would be transferred to the leaseholder in addition to the new R&PP transfers that occur as part of the land disposal process. Reversionary clauses in the leases require reimbursement to BLM for 85 percent of the sale price if the leasehold disposes of land that was acquired for public purposes under the R&PP Act. This requirement ensures that the BLM is compensated for any lands granted for public uses that are later converted to private use. Additionally, the requirement prevents the reversion of isolated parcels back to the BLM after surrounding lands have been transferred to other parties as part of the disposal action.

An annual average of 440 acres of R&PP leases are granted that would eventually be transferred to the leaseholders for public purposes under the Proposed Action. This amount of R&PP leases is projected to decrease on an annual basis as the remaining BLM lands are sold or transferred; however, approximately 1,500 acres are projected to be leased for R&PP uses through 2015.

Under the Proposed Action all land available for disposal would be transferred to other parties. The BLM would issue ROW grants across lands not yet disposed to support local planning agencies and parties responsible for development of infrastructure. In some cases the only access to private lands may be through BLM lands thus ROW grants would be issued to provide access for development of these private lands. Activities conducted under ROW grants must comply with BLM standards and requirements for surface disturbing activities and resource protection while BLM retains ownership of the land. The BLM would work with local governments, planning agencies, and service providers to identify alignments for utilities and roadways to support devel-

opment of lands consistent with local land use plans.

The location of ROW alignments and public facilities are based on city and county land use and development plans. Permanent and temporary ROW requirements vary in length and width depending on the specifications of the distinct projects, but the alignments would generally not exceed 100 feet from each side of the centerline (200 total feet wide). The alignments are typically located along north-south and east-west section lines. The maximum amount of ROW alignments on the remaining BLM lands covers approximately 12,700 acres using a grid system with alignments on every north-south and east-west ¼- and ½-section lines. Linear ROWs would be issued consistent with local governments' transportation plans and land use plans. Permanent ROWs are required for:

- Facilities including pumping stations, discharge pipelines, reservoirs, pumping stations, debris basins, and channels.
- Utility corridors including above- and underground electrical transmission lines and maintenance roads, gas pipelines, water pipelines, sewer pipelines, and cable and fiber optic lines.
- Roads including improvements to existing roadways (widening, installing curb, gutter, sidewalks, streetlights and signs), and new road construction.

Temporary ROWs are required for areas that would be disturbed during construction activities for a relatively short period of time. Lands with a temporary ROW may be used for:

- Surveying and staking of the project area and ROW boundary.
- Equipment and materials storage and staging areas.
- Storage of plant material and the top 6 inches of soils that would be used during the reclamation phase of the project.

- Pipe and pole layout along alignment.
- Trenching, backfilling, and construction activities.

The location and acreage of land needed for facilities such as flood control detention basins, pumping stations, and water reservoirs are unknown at this time. However, in addition to the land needed for the facility site it is likely that many of these facilities would require access roads, electrical power, and water lines, and security fencing.

Numerous types of utilities may be placed in the same alignment provided the utilities are compatible. The ROW width needed for utility lines varies depending on the project specifications such as the pipe diameter. Gas pipelines, which typically range in diameter from 4 inches to 36 inches, generally require a ROW width of approximately 50 feet for both permanent and temporary construction along the entire length of the alignment. Water and sewer pipelines may have pipe diameters of up to 12 feet. A ROW width for water and sewer pipelines would be between 150 feet and 200 feet for both temporary and permanent construction activities. The ROW width needed for above-ground power lines is determined by the electrical capacity of the transmission lines and the height of the poles. Generally, a 200-foot ROW is sufficient for both permanent and temporary disturbances with additional acreage needed at each pole location.

The ROWs granted on an annual average basis total approximately 1,300 acres. This amount of ROW grants is projected to decrease on an annual basis as the remaining BLM lands are sold or transferred; however, approximately 4,500 acres are projected to be granted for ROW purposes through 2015. The BLM lands would be disposed subject to any encumbrances such as ROWs.

The BLM lands within the disposal boundary area are withdrawn from mineral resource development subject to valid existing rights. There would be no entry or location allowed under the Mining Act, no leasing of mineral rights under the Mineral Leasing Act, and no issuing of permits or community-use pits for mineral material sales under the Materials Act. No access to the mineral

estate is allowed under SNPLMA and the Clark County Act.

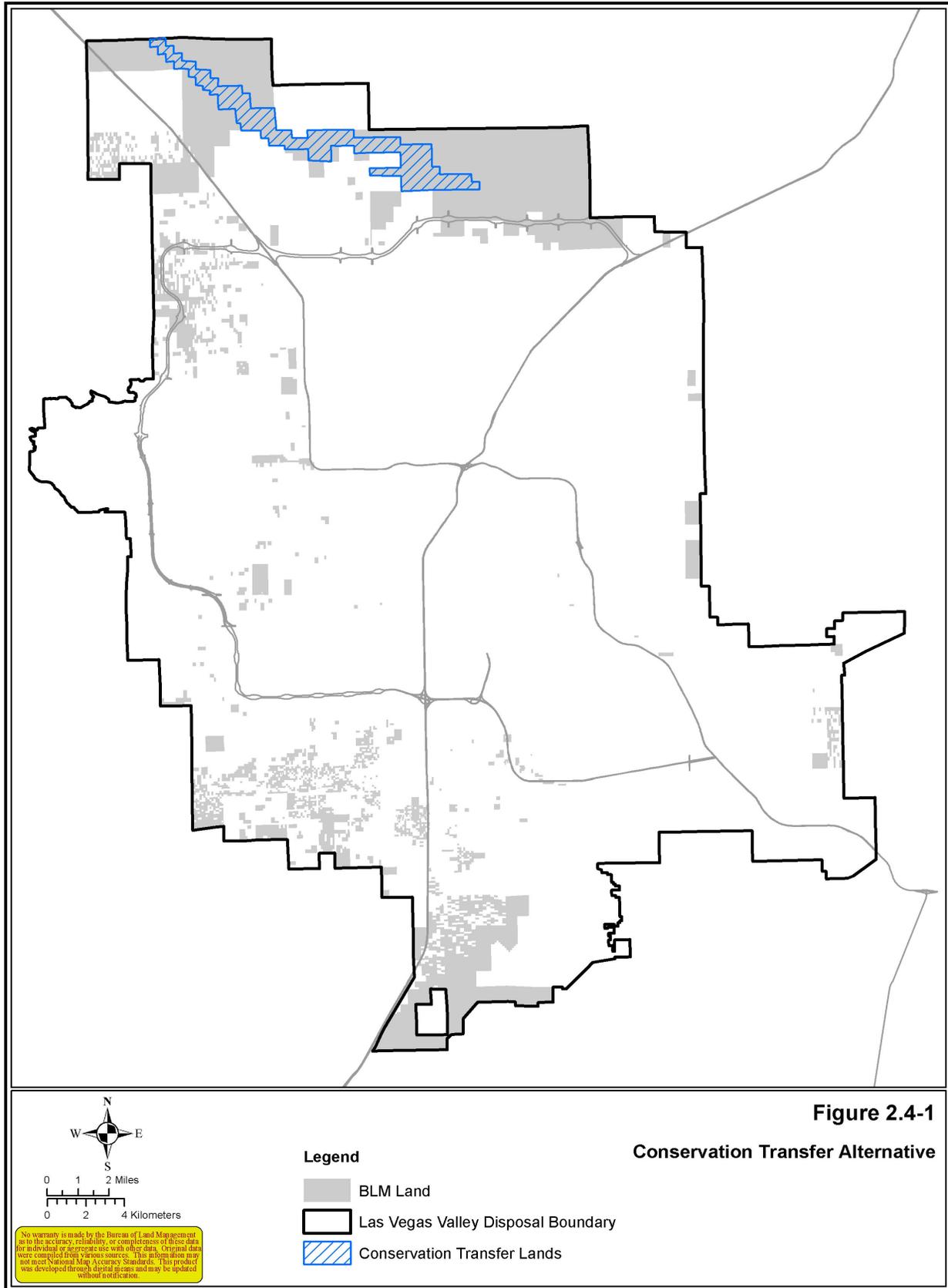
2.4 CONSERVATION TRANSFER ALTERNATIVE

The Conservation Transfer Alternative is similar to the Proposed Action except that approximately 5,000 acres of land have been identified as a Conservation Transfer Area (see Figure 2.4-1). The Conservation Transfer Area was established based on the unique paleontological resources, cultural resources, and special status plant species that were located during the field surveys conducted within the disposal boundary area.

Land within the Conservation Transfer Area may be nominated for transfer to local or regional government agencies using the same process as the other disposal lands. However, the BLM would not transfer title to any lands within the Conservation Transfer Area until a Conservation Agreement is signed by all parties to the agreement. This agreement would provide for the long-term protection of sensitive resources within this 5,000-acre area. The agencies would be required to manage the lands consistent with the approved Conservation Agreement to ensure protection of sensitive resources. To develop and implement the Conservation Agreement, the BLM would establish an inter-agency steering committee to address options on how best to conserve the sensitive resource values within the Conservation Transfer Area yet fulfill the intent of SNPLMA and meet the land development expectations of local governments

A steering committee would be created to assess land nominations for consistency with the approved Conservation Agreement. The committee would consist of representatives from the local governments and regional governments, as defined by SNPLMA, and other agencies and organizations as appropriate including, but not limited to:

- Local Agencies
 - City of Las Vegas
 - City of North Las Vegas
 - City of Henderson



- Regional Agencies
 - Clark County Regional Flood Control District
 - Clark County Water Reclamation District
 - Southern Nevada Water Authority
 - Clark County Public Works
 - Clark County Comprehensive Planning
 - Clark County Parks and Recreation
 - Regional Transportation Commission of Southern Nevada
- State Agencies
 - State Parks
 - State Historic Preservation Office
 - Division of Forestry
- Federal Agencies
 - U.S. Fish and Wildlife Service
 - Native American Tribes
- Organizations
 - Friends of Tule Springs

The steering committee would determine mechanisms by which to transfer the lands to entities that would protect the resources by agreeing to uses that include maintenance of open space, conservation of paleontological and biological resources, and development of interpretive, educational, and compatible recreational opportunities. The steering committee would consider options for highest and best use of the area, funding mitigation or conservation efforts, designations for R&PP leases, long-term management and maintenance, and activities that support public appreciation of the resources, such as educational and interpretive facilities.

Some lands within the Conservation Transfer Area may be offered for limited development, provided that resource protection measures such as mitigation of impacts to sensitive plant species or recovery of paleontological data are required prior to approval of development within the area. Mitigation and resource protection requirements for any development in the area would be determined through a consultative process among the steering committee and would vary based on the location proposed for development and extent of resource impacts.

Approximately 41,700 acres of BLM-managed lands in the disposal boundary area (excluding the

Conservation Area) would be transferred at an annual average rate of 4,000 acres per year, with remaining available land completely transferred by 2015. It is also projected that nearly 17,500 acres of development would occur through 2018.

The BLM would continue to implement realty actions under the Conservation Transfer Alternative. The conditions related to the R&PP leases and ROW grants would be the same as those described for the Proposed Action. Approximately 1,200 acres is projected to be R&PP leases and eventually transferred for public purposes to the leaseholder. This amount could be much higher if portions of the Conservation Transfer Area are disposed under provisions of the R&PP Act. Approximately 3,500 acres are projected to be covered by ROW grants and eventually transferred.

Entry and access for mineral resource development on BLM land within the disposal boundary area have been withdrawn under SNPLMA and the Clark County Act, subject to valid existing rights that have already been granted under the mining laws. No mining claims, leases, permits, and community use pits for mineral material sales would be granted as discussed under the Proposed Action.

2.5 NO ACTION

The No Action Alternative is based on the existing management direction specified in the 1998 Las Vegas RMP/EIS. The Record of Decision for the RMP/EIS identified 52,021 acres available for disposal in the Las Vegas Valley. The RMP projected that up to 25,540 acres in the Las Vegas Valley Disposal Area would be sold during the 20-year planning period through 2018. That estimate was based on an evaluation of demand for property in the area and the configuration of the disposal boundary at the time the RMP was developed.

The impacts of the projected disposal during the planning period were evaluated in the RMP/EIS. Land disposals authorized by SNPLMA and the Clark County Act that would result in sales and subsequent development of more acreage than the amount evaluated in the RMP are not included in the No Action Alternative.

Under the management direction prescribed in the RMP, the BLM would continue to implement realty actions in the disposal area consistent with the multiple-use directive of FLPMA. The conditions related to the R&PP leases and ROW grants would be the same as those described for the Proposed Action. The R&PP leases and leases with transfer options would be issued to government entities for public uses. Reversionary clauses in these actions would require return of land to BLM if the government agency ceased using the land for designated public purposes.

The RMP also provides for BLM to grant ROWs to allow access across BLM administered lands for infrastructure and conveyances, including roads, power lines, pipelines, and flood control structures. Rights-of-way would be granted to allow access for development on private lands where access across BLM land is needed for development of private property. Based on existing information, it is estimated that approximately 1,300 acres of ROW grants and 440 acres of R&PP leases would be granted over the next few years to support development of previously disposed lands. It is projected that realty actions for ROWs on BLM lands would begin to decrease as previously disposed lands are fully developed and no additional lands are sold. Demand for R&PP leases for parks, schools, and flood control facilities would likely continue depending on the location of development and location of BLM land.

The RMP withdrew lands inside the Las Vegas Valley Disposal Area identified in the RMP from mineral location and solid mineral leasing. These withdrawals would continue under the No Action Alternative. Additional lands identified for disposal by SNPLMA and the Clark County Act would remain open to mineral location, leasing, and mineral material sales under the No Action Alternative, consistent with the requirements of the 1998 RMP management directions for development of mineral resources.

2.6 ALTERNATIVES CONSIDERED BUT ELIMINATED

A NEPA review specifies the purpose and need for the proposed action, describes the action that the federal agency proposes to meet that purpose

and need, and identifies reasonable alternatives. A potential alternative might be eliminated from detailed consideration for many reasons including, but not limited to, if the alternative would take too long to implement, would be prohibitively expensive, or would be highly speculative in nature and thus is considered unreasonable. This section identifies the alternatives that were eliminated from further consideration and provides a brief explanation of the reasons for elimination. In general, alternatives were eliminated from further consideration if they would not comply with the intent of SNPLMA or would not fulfill the project purpose and need.

2.6.1 BLM Directed Sales

Under this alternative, the BLM would specify which parcels would be available for public auction and when the parcels would be available. This alternative would not meet the requirements of SNPLMA to include local governments in the nominating process and would not provide the opportunity for local governments to acquire specific parcels for public purposes prior to public auction.

2.6.2 BLM Maintains Ownership and Management

Two alternatives relating to BLM retaining ownership and management of lands within the disposal boundary area that contain sensitive resources were considered, but eliminated from evaluation. The first alternative was for BLM to designate the lands containing sensitive resources as an Area of Critical Environmental Concern (ACEC). This alternative was eliminated from evaluation because retaining land within the disposal boundary area is not consistent with the directives of SNPLMA and the Clark County Act. These two laws direct BLM to dispose of public lands within the disposal boundary area and do not specify any basis for retaining public lands, other than requirements of other laws such as the Endangered Species Act. This action would result in the continuation of BLM retaining isolated tracts of land surrounded by private land. Retaining isolated tracts of land in urban areas is not part of BLM's mandate to manage public lands for

multiple uses, as specified under FLPMA. This alternative would also not meet the purpose and need for the land disposal action, which is to address scattered ownership patterns.

The second alternative of keeping the lands within BLM ownership and management was to designate certain areas as a National Conservation Area (NCA). This alternative was eliminated from evaluation for the same reasons described under the ACEC alternative. Additionally, establishment of an NCA would require Congressional action.

2.6.3 Transfer Title to Other Federal Agency

Lands would be transferred to other federal agencies for use or for resource protection activities under this alternative. For example, lands that are identified as containing sensitive biological resources would be transferred to the Fish and Wildlife Service. The legislation directing BLM to dispose of lands specified that disposal actions are to result in transfer of land to local governments and private parties for development, in compliance with the land transfer mechanisms of FLPMA and in compliance with other laws. Transfer of lands to other federal agencies would not meet the intent of these laws, and therefore, were excluded from further consideration in the analysis. In addition, the purpose for protecting lands would need to be within the mission of another land management agency before transferring title would be considered feasible. This alternative was eliminated because the SNPLMA specifically defined the unit of local government as Clark County, City of Las Vegas, City of North Las Vegas, or City of Henderson.

2.6.4 Transfer Title to Private Organization

The transfer of title to BLM lands to private organizations was reviewed but not considered feasible. This alternative would allow private organizations such as the Friends of Tule Springs or The Nature Conservancy to nominate certain parcels for acquisition instead of offering the parcels at public auction, much in the same manner

that SNPLMA allows for local governments to acquire parcels. This alternative was eliminated because the SNPLMA specifically defined the unit of local government as Clark County, City of Las Vegas, City of North Las Vegas, and the City of Henderson. Private organizations were not included in SNPLMA and therefore it would be a violation of the law to offer parcels to certain private organizations prior to the offering of parcels to the public at large. Nonprofit organizations are eligible however to lease lands under the R&PP Act with certain restrictions regarding the amount of land and jurisdiction of the organization. Local governments may wish to nominate certain parcels for sale with the understanding of conveying title to private organizations, however direct conveyance from the BLM is not an option.

2.7 SUMMARY OF ENVIRONMENTAL IMPACTS

Chapter 4.0 presents an analysis of the impacts resulting from the Proposed Action, Conservation Transfer Alternative, and No Action Alternative. Table 2.7-1 provides a comparison of alternatives by resource and potential impact. There would be minimal direct impacts from the transfer of land ownership and there may be direct impacts from the implementation of realty actions. Indirect impacts would primarily result from the development of the disposal lands.

**TABLE 2.7-1
COMPARISON OF ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVES**

Resource	No Action Alternative	Proposed Action	Conservation Transfer Alternative
Air Quality	<ul style="list-style-type: none"> * Direct impacts from realty actions would be insignificant. * Realty actions would conform to particulate matter (PM₁₀) and carbon monoxide State Implementation Plans. 	<ul style="list-style-type: none"> * PM₁₀ and carbon monoxide emissions would not exceed standards. * Preliminary air quality modeling results indicate compliance with ozone 8-hour standard. * Sulfur dioxide emissions decrease. 	Impacts similar to Proposed Action but emissions would be slightly less.
Earth Resources	<ul style="list-style-type: none"> * Indirect impact from seismic activity would be insignificant. * No impacts from the continued withdrawal of the lands from entry and mineral development. * No significant impacts on soil resources. 	<ul style="list-style-type: none"> * Increased groundwater pumping may result in subsidence. * No impacts from the continued withdrawal of the lands from entry and mineral development. * No significant impacts on soil resources. 	<ul style="list-style-type: none"> *Fewer disturbances to potentially unstable slopes. *No impacts from the continued withdrawal of the lands from entry and mineral development. *Surface disturbance limited to protect soil conditions that support special status plants and paleontological resources.
Water Resources	*No significant impacts.	<ul style="list-style-type: none"> *No significant impacts to surface water. *No significant impacts to groundwater. *Future water demands assessment required. 	*Impacts similar to proposed action but water demand would be slightly less.
Biological Resources	*Direct insignificant impact from loss of vegetation and wildlife habitat and species from construction on ROW and R&PP lands.	<ul style="list-style-type: none"> *Potential significant adverse impacts to sensitive plant species. *Potential significant impacts to common wildlife and habitat. *Adverse impacts to sensitive wildlife not significant. 	<ul style="list-style-type: none"> *Fewer disturbances to sensitive plant species and habitat. *Beneficial impacts of long-term conservation of sensitive plant species and habitat.
Cultural Resources	*Beneficial impact.	*Potential significant adverse effects to the sites if not first mitigated.	*Sites located within the Conservation Transfer Area would not be affected.
Native American Resources	*Beneficial impact.	*No direct impact to Native American resources.	*Could be positive indirect impact because of the restricted development.
Paleontological Resources	*Indirect impacts from increased public access.	<ul style="list-style-type: none"> *Indirect impacts from increased public access. *Potential significant adverse impacts if resource destroyed by development. 	<ul style="list-style-type: none"> *Long-term conservation of resources. *Indirect adverse impact to developers and some recreation users.
Visual Resources	*No direct impacts.	<ul style="list-style-type: none"> *Visual impacts would be compatible with planned land uses. *Visual Resource Management classifications would not apply after title is transferred. 	*Visual impacts would be less for areas surrounding the Conservation Transfer area.

**TABLE 2.7-1
COMPARISON OF ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVES**

Resource	No Action Alternative	Proposed Action	Conservation Transfer Alternative
Land Use	*Substantially conflict with land use plans and community goals, which would be a significant indirect impact.	*No significant impact because development would not conflict with land use plans and community goals. *Realty actions would avoid the Tule Springs site or mitigation would be required.	*Conflict with planned residential use.
Recreation and Wilderness	*No direct impact. *Indirect significant adverse impact by eliminating source of funding for recreation area improvements.	*Indirect impact on recreation uses and users. *Designated roads would still be available thus impact from reduced access would be insignificant. *Beneficial impact from funding source for recreation area improvements.	*Beneficial impact by preserving open space for compatible recreation uses. *Beneficial impact from funding source for recreation area improvements.
Hazardous Materials	*No direct impacts.	*Five recognized environmental conditions recommended for further investigation. *Potential indirect impacts during construction.	*Indirect impacts would be similar to the Proposed Action. *One recognized environmental condition located in Conservation Transfer Area.
Socioeconomics	*No direct impacts.	*Estimated \$8.6 million additional construction dollars. *Estimated \$5.4 million additional industry related dollars. *Estimated \$3.4 million additional business and real property tax dollars.	*Estimated \$7.2 million additional construction dollars. *Estimated \$4.5 million additional industry related dollars. *Estimated \$3.2 million additional business and real property tax dollars.
Environmental Justice	*No direct impacts.	*No populations identified. *Potential indirect beneficial impact to low-income workers. *Affordable housing units would have an indirect beneficial impact on low-income individuals.	*Same as Proposed Action.
Range Management	*Disposal areas closed to livestock grazing.	*No adverse impact on livestock operations. *No financial profit or loss for the permittee.	*Same as Proposed Action.

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