Appendix I

Public Comments

REGIONAL FLOOD CONTROL DISTRICT

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BUREAU OF LAND MANAGEMENT
LAS VEGAS, NEVADA

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General Manager/Chief Engineer

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October 13, 2003

Mr. Jeffery Steinmetz
Bureau of Land Management
4701 N. Torrey Pines Drive
Las Vegas, NV 89129

Dear Mr. Steinmetz:

This letter is written in response to the Bureau's announcement regarding the preparation of an Environmental Impact Statement (EIS) addressing the impacts associated with the disposal of Federal lands in the Las Vegas Valley. While that announcement mentioned only scoping meetings and not the submittal of written scoping comments, I am hopeful and expect that the comments provided herein will be addressed in the EIS.

The sale of Federal lands in the Las Vegas Valley typically results in those lands being made available for private development and promotes area-wide growth. The rate of development and growth that the Las Vegas Valley has experienced over the past 15 years has put an immense burden on public agencies responsible for providing services throughout the area. The EIS should include an analysis of the amount and rate of development that will result from the privatization of public lands, and assess the impact that this additional growth will have on public agencies like the Regional Flood Control District, and others (direct, indirect, and cumulative impacts).

The Flood Control Master Plan identifies the need for various flood control facilities throughout the Las Vegas Valley and Clark County. Many of these facilities are planned to be located on Federal lands. If public lands where future drainage facilities are planned to be sited are sold to private developers, the cost of providing flood protection throughout the area will increase significantly. To date, local governments have not been allowed to file applications for rights-of-way for the needed lands until advanced site-specific engineering plans have been developed. In the interest of public safety, I would hope that parcels needed for public drainage facilities, as identified in the Flood Control Master Plan and/or by local governments, will be reserved for that use and not be made available for disposal to private parties.

600 S. Grand Central Parkway, Suite 300 • Las Vegas, Nevada 89106-4511
(702) 455-3139 • FAX: (702) 455-3870
Website: http://www.ccrfcd.org

Thank you in advance for your consideration of these issues in the Land Disposal EIS. The District looks forward to working closely with the Bureau as cooperating agency for the preparation of the EIS. Please don't hesitate to contact me if you have any questions or require additional information.

Sincerely,

GALE WM. FRASER III, P.E.
Chief Engineer/General Manager

GWF:TES:cmf

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Department of Comprehensive Planning

500 S Grand Central Pky • Ste 3012 • PO Box 551741 • Las Vegas NV 89155-1741
(702) 455-4181 • Fax (702) 385-8940

Alan Pinkerton, Acting Director

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2003 OCT 28 P 12:13
LAND MGMT
LAS VEGAS FIELD OFF.

October 27, 2003

Mark Morse, Field Manager
BLM Las Vegas Field Office
4701 North Torrey Pines Drive
Las Vegas, NV 89130-2301

Dear Mr. Morse: MSM

Thank you for the opportunity to provide scoping comments for your important EIS on Las Vegas Valley Disposal Boundary actions.

The issues, concerns and opportunities we wish you to consider are:

1. The EIS should address how to protect the natural lands that will come in contact with the new urban interface. The issue of how to manage roads that terminate on the boundary of public lands, as well as the orderly development of trails and access should be addressed. The question of transition zones and buffers should also be considered.

2. The current drought has raised serious questions concerning both the supply of water to the Las Vegas Valley as well as how any available water is used. The EIS should address the question of the connected action of making more land available for development and the ultimate supply of water to support it.

   A different but related issue is the possible use of development agreements to govern landscaping and land uses that are heavily water-dependent.

3. Effects on species covered by the Clark County Multiple Species Habitat Conservation Plan (CCMSHCP) should be addressed. Of particular concern is the Las Vegas buckwheat, *Eriogonum corymbosum*, var. *aureum*. The EIS should consider development agreements, open space set-asides or other means to afford the species protection that allows continued in-situ persistence.

4. A connected action with regard to land disposal in former Wilderness Study Areas is that of the CCMSHCP's requirement for "no net unmitigated loss" of critical habitat for covered species. Unless otherwise resolved, the Disposal EIS should address how

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the BLM will meet its obligations under the CCMSHCP Implementing Agreement for no net unmitigated loss.

The Clark County Department of Comprehensive Planning appreciates our opportunity to comment and your consideration of these issues. We look forward to assisting in the development of the Disposal EIS as a "cooperating agency". Our contact for this effort will be Environmental Division Manager, Rob Mrowka (455-3119 or rmrowka@co.clark.nv.us).

The public and private lands in Clark County are inextricably linked, and the partnership we enjoy with the BLM is both appropriate and necessary to address the issues and serve the people of Clark County.

Sincerely,

ALAN S. PINKERTON
Acting Director

cc: Rick Holmes
Rob Mrowka
Lewis Wallenmeyer
Paul Seltzer

Nevada Power

www.nevadapower.com

5226 W. Sahara Avenue • Las Vegas, NV 89146 • P.O. Box 98910, Las Vegas, NV 89151-0001

October 28, 2003

RECEIVED
Bureau of Land Management

OCT 28 2003

LAS VEGAS
FIELD OFFICE
Las Vegas, Nevada

Mr. Mark Morse
Las Vegas Field Manager
Bureau of Land Management
4701 N. Torrey Pines
Las Vegas, Nevada 89130-2301

Dear Mark:

In response to your public notice of intent to produce a valley wide EIS for legislatively authorized land disposal, I am submitting the following comments on behalf of Nevada Power Company.

As you know, Nevada Power Company has the responsibility and authority to provide electricity to our communities. Therefore, we must be proactive in determining where transmission, distribution and substation facilities can be sited in anticipation of future growth. The land disposal EIS is an opportunity for BLM to include future infrastructure facilities required by Nevada Power to support development of these lands.

Nevada Power will work closely with you and your consultant, PBS&J, and with all involved community based permitting authorities, to propose routes for transmission and distribution, and sites for substations that will benefit the community. We respectfully request that you and your consultant allow us to include Nevada Power's requirements for siting and routing alternatives in your EIS process, participate in open house presentations, and share in data collected by your consultants for the preparation of grants and environmental documents going forward.

Your cooperation and data sharing will make this valuable process a map for future development.

Sincerely,

Eileen Wynkoop
Environmental Scientist

SIERRA CLUB - *Toiyabe Chapter*

Southern Nevada Group
P.O. Box 19777, Las Vegas,, Nevada 89132

BLM
LV Field Office
4701 N Torrey Pines Drive
Las Vegas NV 89103-2301

October 14, 2003

Re: Scoping comments for the EIS on LV Valley Disposal Boundary actions

Dear Sir/Ma'am:

Please **include an EIS alternative** where only parcels that are inside the already-developed metro areas are offered for private sale.

The alternatives would look something like the following:

a. "All" Offer all BLM parcels for private sale
b. "All - minus" Offer all BLM parcels for private sale with certain parcels withheld for special consideration for sensitive plants and animals, or concerns for water, air quality, viewshed, cultural and paleontologic resources, recreation, etc.
c. **"Infill - minus"** Offer only BLM parcels for private sale for infill development inside the already-developed metro area of Las Vegas, North Las Vegas and Henderson with certain parcels withheld for special consideration for sensitive plants and animals, or concerns for water, air quality, viewshed, cultural and paleontological resources, recreation, etc. Delay offering parcels on the edge of the metro areas until use of the vacant land within the metro areas has been maximized.
d. "No" Offer no BLM parcels for private sale.

Rationale:

The reasoning for this new alternative is based on land management and community planning issues. We want to create a metro area that offers an excellent quality of life surrounded by a healthy, vital desert. To do this, we must encourage growth within the already-developed metro areas, and delay the urge to enlarge our metro areas until we have maximized the use of the land already available to us. Here's a little more detail:

a. **Unsold BLM parcels.** Smaller parcels within the metro areas have been offered for private sale in the past and have not been sold. Cities and developers need to be encouraged and incentivized to make use of these infill parcels before spreading to parcels on the metro edges.
b. **Vacant land.** There is a significant portion of the metro area that is undeveloped. Dr Robert Fielden, a professor of architecture and urban design at UNLV, in a piece aired by KNPR radio station, estimates the undeveloped land at a full quarter. Ms Betsy Fretwell, Deputy City Manager for the City of Las Vegas, in a personal communication, estimates the undeveloped land at a third. The vacant land is in smaller lots; part is private, part is public. Cities and developers need to make use of this land before spreading to land on the metro edges.

c. **Dust.** For the past several years, the Las Vegas Valley has been an EPA non-attainment zone for dust (PM10). Recently we have had ozone exceedences that put us into non-attainment for ozone as well. Vacant land within the already-developed metro area is a major source of dust (PM10). The best use for the vacant lots would be for building sites and parks rather than mere dust-stabilization. Conversely, expanding the size of the metro area exacerbates problems with non-attainment for both PM10 and ozone. No disposals should be made until both our PM10 and ozone plans are written, approved, funded and implemented in a meaningful way.
d. **Schools, fire stations, police stations, roads.** Infill development takes advantage of schools, fire stations, police stations and roads that are already in place. Developers may pay for initial costs of these services, but the continuing costs for operations and maintenance fall to homeowners and taxpayers.
e. **Water.** No parcel should be offered for sale without the assurance that water will be available within the short-term, say within a year, of the sale. SNWA has water services basically in place up to the old property disposal boundary. This means that any parcels added because of the new property disposal boundary should be withheld from sale until both water availability and services are assured and in place.
f. **Flood control.** Infill development makes sure that people are protected with adequate flood control structures. Flood control structures are not only expensive but time-consuming to build. Development on the edge of the metro areas is outpacing our ability to get flood control structures into place in spite of our frantic pace of building. The tragic floods in northwest Las Vegas this past summer are terrible proof of outstripping our ability ti build fast enough.
g. **Transit.** Infill development helps to make sure that people have transportation services that they need. The RTC is unable to serve large parts of the Valley with public transportation because we are already too big for them to keep up. The RTC has had to shrink the operating distance of paratransit services that they were once able to offer; we are only within the requirements of the Older Americans with Disabilities Act, where we used to exceed those requirements.
h. **Professional services.** Infill development helps to make sure that people have the professional services that they need. Retail services follow new development pretty quickly, but professional services such as health care, doctors' offices, hospitals, churches, community centers and other services can be extremely slow in coming. An example is the new Spring Valley Hospital that is opening this next week - the 220,000 people that it will serve would be considered by most to be in the heart of town! This is incredibly reprehensible to let our cities grow so fast that we are without hospital and emergency care.
i. **Parks and recreation.** Infill development helps to make sure that people have the open space and recreation opportunities that they want and deserve. This is another community component that takes along time to get into place. Centering our growth in areas that have the beginnings of good parks, trails, recreation, youth and senior centers is a good way to make sure that a large part of our population get the services they need.

Other concerns:

Land Management

- Delay all sales until infill is maximized, even if the delay pushes it beyond the legislative limit, which would require new legislative action.
- Designate County, City and Regional parks, trails and open space sites before any parcels are offered for sale.
- Designate easements for access routes through parcels offered for sale to ensure adequate access to public land.
- Incorporate comments from Clark County's Environmentally Sensitive Lands Committee.
- Plan transition zones between intensely-used urban areas and rural areas, and between rural areas and natural areas. Transition zones could include areas developed in pods with lots of open space, developed or undeveloped parks, and green belts or passive parks along private boundaries and along washes. Use mechanisms such as development agreements to make sure these things happen.
- Designate sites for schools, fire stations and police stations before any parcels are offered for sale.
- Designate sites within the disposal area for flood control structures and utility rights of way before parcels are offered for sale. Additional public land should not be used to provide these services for developed areas.
- Designate sites and routes for public transportation and roads before parcels are offered for sale.
- Use a mechanism such as a development agreement or a memorandum of understanding with local governments, to make sure that the above things happen.

Air Quality

- A healthy desert is an asthma-free zone. Our desert cities should strive to be asthma-free zones.
- Maximize infill land use to minimize ozone and dust zone.
- No disposals should be made until both our PM10 and ozone plans are written, approved, funded and implemented in a meaningful way.
- ATV parks present almost insurmountable noise and dust control problems. ATV users like areas close to home to run their rigs; close to their home is always close to someone else's home! Is there any way that ATV users can be accommodated in the planning stages, knowing that noise and dust have such challenges? Can ATV parks be designated with buffer zones surrounding them that would provide neighborhood access, but also give dust and noise protection? Can ATV parks be sited so that no sensitive plants or animals are impacted?

Water

- Make sure that water services are in place within a year of a sale.
- Protect all sites where there is groundwater as sites for sensitive plants and animals.
- Can there be a development agreement as a part of each sale that requires residential and commercial desert landscaping and a prohibition of outdoor water features?
- Can large water-users such a golf courses be controlled through a separate carefully-considered decision making process?

Biological Resources

- Protect the Las Vegas buckwheat population near Decatur and Lone Mt. (Please see attached map for approximate locations.) This is almost exactly the same area as the Tule Springs Dig Site. Determine requirements for the buckwheat to thrive. There needs to be an assessment of cumulative impacts of development and human activity on the surviving buckwheat populations. Use a mechanism such as a park or a development agreement. This might include designing a transition zone of development around it.
- Protect populations of the Las Vegas bear poppy wherever they occur within the disposal area. There needs to be an assessment of cumulative impacts of development and human activity on the surviving poppy populations.
- Protect sensitive plans and animals as reflected in the biological overlay accepted by Clark County's Environmentally Sensitive Lands Committee. The source of this biological overlay is the work that The Nature Conservancy has done in Clark County on biological 'hot spots.'
- Consider designating passive, undeveloped parks and open space as a way to protect sensitive plants and animals. This would be a kind of transition zone.
- Can there be a development agreement as a part of each parcel that borders a national conservation area/national recreation area/national refuge/national park, that would require some sort of transitional development? The transition zone could accommodate certain kinds and density of development while allowing access to public land, and a gateway from an urban zone to a natural zone.
- Can there be salvage of plants and animals before building begins?
- Can there be a development agreement that requires washes to be developed as linear, desert landscaped, wildlife-friendly parks rather than concrete channels?
- Incorporate comments from Clark County's Desert Conservation Plan administrator.

Recreational Opportunities

- Provide for city, county and regional parks, open space and trails early with in the planning process.
- Include passive, undeveloped parks and open spaces as well as other more development-intensive parks.
- Require desert landscaping. Minimize landscape that needs watering by using an additional, well-considered decision making process for parks that need turf and other high-water requirements.
- See "Air Quality" above for concerns about ATV parks.

Cultural and Paleontologic Resources

Protect the Tule Springs Dig Site of Eocene fossils near Decatur and Lone Mt. (Please see attached map for approximate location.) This is almost exactly the same area as the Las Vegas buckwheat population. Use a mechanism such as a park or a development agreement to ensure that this National Historic Registry site is protected and available to the public.

Sincerely,

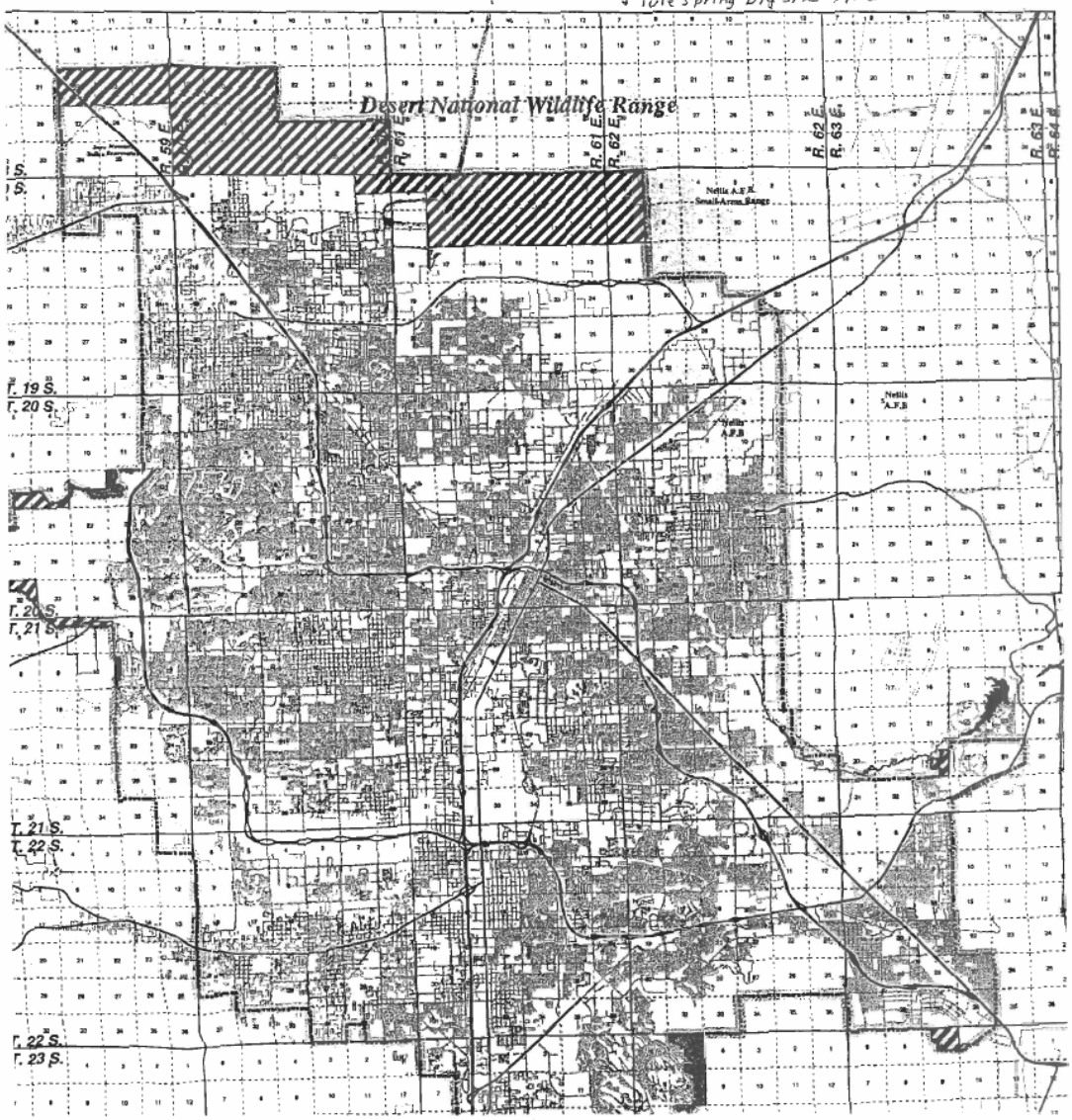
Jane Feldman

Jane Feldman
Conservation Chair

cc to PBS&J

Changes to the 1998 SNPLMA Boundary in 2002

- Las Vegas Buckwheat
- Tule Spring Dig Site Area



Subject: Scoping comments for the EIS on LV Valley Disposal Boundary actions
10/14/2003 10:13 AM

Dear Ms. Fry,

On behalf of the Sierra Club, as an active member, I would request consideration of the following:

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Sincere,

Courtney Purcell

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
Las Vegas Field Office

Las Vegas Valley Disposal Boundary Environmental Impact Statement

Copies of comments will be available for public review at the local BLM office during regular business hours. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

PLEASE PRINT

Name: Gary Beckman	Organization: Sierra Club
Address: 5808 Delabarre	City: Las Vegas
State: ~~Las Vegas~~ NV Zip: 89108	Withhold Personal Information: ☐ No ☐ Yes
Add to Mailing List: ☐ No ☒ Yes	Send Copy of EIS: ☒ No ☐ Yes ☐ CD ☐ Print

Comments:

There are some interesting and scenic "bad lands" areas in the far northwest. These are relict lake bed deposits that are geologically unique and scenic. They have scientific value as well as recreational value. Some of these areas should be set aside and preserved for public use (whether BLM lands, city or county parks.)

SEND COMMENTS TO:

Mailing Address: LV Valley BLM Land Disposal EIS
PBS&J
2270 Corporate Circle, Suite 100
Henderson, NV 89074-6382

Email Address: lvblmeis@pbsj.com

Tule Springs Preservation Committee

Civilian Volunteer Committee of Floyd R. Lamb State Park

October 27, 2003

To:
U. S. Department of the Interior
Bureau of Land Management
Las Vegas Field Office

From:
Donald J. White-President
Tule Spings Preservation Committee

Re: Las Vegas Valley Disposal Boundary Environmental Impact Statement Comments.

To preface with a brief introduction, our organization was formed 4 years ago to serve as a committee of concerned citizens of the Las Vegas valley to preserve, protect, and enhance Floyd R. Lamb State Park at Tule Springs. Our organization is registered with and recognized by the Nevada Secretary of State's office.

After attending the public forum on the above land disposal area, it has come to our attention that this area includes the 940 acre Tule Springs "Bid Dig" national historic site. Also included within this same historic site are 240+ acres of State Park lands.

This site has historic designation by the federal government for several reasons. First, this area was the site of the largest paleontilogical and paleo-geological excavation in terms of geographic and excavated area in the world. Second, many state of the art processes were developed and used in the dig, including the first use of carbon 14 dating to determine age of fossil remains. Third, the excavation produced a very large sampling of Pleistocene remains, both floral and faunal, many of which remain in situ at this site. "Bid Dig" scientists that recently attended the 40 year reunion of this historic event and, even more recently, the paleontologists commissioned by BLM to survey the subject disposal areas, both attest to the fact that this area remains a 'treasure trove" of Pleistocene floral and faunal deposits. Both groups also agree that, though these fossil remains existed in close proximity to artifacts of early man but the relationship could not be definitely proven at the time, the advance of science over the past 40 years encourages a renewed and closer look at this possible historic association.

Forth, our group, in conjunction with Archeo Nevada and UNLV, has been successful in convincing the Clark County School District to establish an earth science magnet program at Shadow Ridge High School which neighbors this site. The premise of this program is to utilize the Big Dig site as an outdoor classroom to allow hands-on experience for these future scientists. We have been successful in securing grant money for this project, and will lend our scientific expertise to the students as required.

Finally, the Big Dig site is predominately located within the Las Vegas Wash, and could be very vulnerable to 100 year and higher flooding. The soil mainly consists of highly expansive clays and collapsible sulfates which would render it very difficult and prohibitively expensive to build on. As a commercial property this site would have little value.

In conclusion, we feel it imperative that this historic site be permanently preserved in its entirety, and permanently remove from this and any future BLM land disposal programs.

Sincerely,

Donald J. White
President, Tule Sprigs Preservation Committee

COMMENT FORM

U.S. Department of Interior
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Las Vegas Field Office

Las Vegas Valley Disposal Boundary Environmental Impact Statement

Copies of comments will be available for public review at the local BLM office during regular business hours. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

PLEASE PRINT

Name:

Organization: Tule Springs Committee

Withhold Personal Information: ☐ No ☒ Yes

Add to Mailing List: ☐ No ☒ Yes

Send Copy of EIS: ☐ No ☒ Yes ☐ CD ☐ Print

Comments:

As secretary of Tule Springs Committee I was surprised some of the 920 acres of the Tule Springs Dig Site was included in the land disposal area.

1. This site is registered in the National Registry of Historical Places.
2. This site has historical value to Las Vegas. The State Museum has created a display about the significance of the site.
3. The Shadow Ridge HS nearby has an earth science program that may use the site.
4. Dr. Paul Buck from UNLV is currently researching the site. ~~are~~ does
5. Recently, more ~~data~~ has been found that may be significant.

How can we remove this piece of land from the land disposal area?

SEND COMMENTS TO:

Mailing Address: LV Valley BLM Land Disposal EIS
PBS&J
2270 Corporate Circle, Suite 100
Henderson, NV 89074-6382

Email Address: lvblmeis@pbsj.com

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
Las Vegas Field Office

Las Vegas Valley Disposal Boundary Environmental Impact Statement

Copies of comments will be available for public review at the local BLM office during regular business hours. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

PLEASE PRINT

Name:

Organization: Friends of Tule Springs

Withhold Personal Information: ☐ No ☒ Yes

Add to Mailing List: ☒ No ☐ Yes

Send Copy of EIS: ☐ No ☒ Yes ☐ CD ☒ Print

Comments:

Regarding land at Tule Springs being put up for sale. This land is under the National Register and should not be sold for any type of possible development. The land that is/has been part of the Tule Springs Dig Site should be kept for scientific study and for the residents/students of our valley to learn about the precious history/beauty of this area. We need to also make sure, with you care, that the other sites currently being discovered are being upheld by National Register Guidelines.

Thank you, T

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Henderson, NV 89074-6382

Email Address: lvblmeis@pbsj.com

NEVADA OUTDOOR RECREATION ASSOCIATION
P.O. Box 1245
Carson City, NV 89702

October 21, 2003

LV Valley BLM Land Disposal EIS
PBS&J
2270 Corporate Circle, Suite 100
Henderson, NV 89074-6382

Dear Sir or Madam:

On behalf of the Nevada Outdoor Recreation Association, I wish to offer the following comments concerning the scoping for an Environmental Impact Statement on the expanded boundary for the Southern Nevada Public Lands Management Act.

Background

I participated in the development of the Southern Nevada Public Lands Management Act from the development of the initial concept to participation in congressionally-sponsored meetings that were aimed at developing the basis and support for the enabling legislation. I helped draw and review the initial boundaries.

After passage of the Act I have expressed my belief that early compliance with the National Environmental Policy Act was essential in developing criteria for the disposal of public lands in the Las Vegas valley. Environmental impacts associated with the rapid buildout of the Las Vegas valley should not be exacerbated by the untimely, or unwise disposal of additional public lands. The direct, and indirect, impacts of those land sales on our environment and on our infrastructure should be examined at an early stage. Unfortunately, the BLM did not prepare a comprehensive EIS to implement the Southern Nevada Public Land Management Act.

General Comments

I am pleased that the BLM has held scoping meetings in response to the passage of the Clark County Conservation of Public Land and Natural Resources Act. The task of assessing direct, and indirect, impacts from additional land sales, land exchanges and other associated realty actions will not be easy. Numerous public agencies and institutions, private firms, and individuals have a stake in the outcome. Obtaining input from these entities and developing a consensus - a masterplan - for the transfer of additional lands from the public sector to the private and local public entities will not be easy. Development of a comprehensive EIS that serves to guide the federal government and our community in planning for additional growth in this metropolitan area will ultimately help everyone by articulating the choices that must be made in allocating services, protecting our environment, and maintaining, or improving, our quality of life. The BLM and cooperating agencies should consider compliance with NEPA and

the development of a comprehensive EIS not as a burden, but as an opportunity.

A major focus in future disposal of BLM lands within the Las Vegas metropolitan area should be to promote infill development.

I trust my comments will assist in your effort in developing a useful document that will guide the decision-making process for some years to come.

Water

At a time when our community is considering measures for responding to an emergency drought situation, there is in many people's minds the appearance of a real problem when additional land is being placed into the market for eventual development. Are people being asked to conserve to create more water for more unwanted growth? Where will the water come from? When will it be available for development? What price must be paid? What will the environmental impacts be? While the issues of future water for future growth may not be viewed as being directly applicable to the disposal of BLM lands in the Las Vegas valley, there is a connection.

The BLM should not entertain the disposal of additional public lands in an area unless there is a commitment from the Southern Nevada Water Authority to provide water for those lands in the near future, e.g. one year. Otherwise, the lands should not be considered for disposal until such time as the water nears the land.

Water quantity is an issue, but also water quality in Lake Mead. The present quantity and quality of water being discharged into the Las Vegas wash and Las Vegas arm of Lake Mead are causing problems. Local wastewater treatment agencies are studying ways of dealing with increased quantities of wastewater flows into Las Vegas wash and Las Vegas bay. Until such time as improvements to our wastewater system are in place to accomodate increased flows from the development of existing private parcels of land in the Las Vegas metropolitan area, restraint should be exercise in disposing of additional lands in the Las Vegas valley - particularly those lands on the outskirts of the metropolitan area. Private land owners and smaller public parcels of land within the developed metropolitan area should be given preference in developing those parcels at a time when water quantity and water quality issues are a major concern for the area.

Flood Control

Priority with our developing flood control system has been given to protecting property and lands that are most likely to be developed in the near future. The sale of public lands on the outskirts of the Las Vegas valley will place new demands on our flood control system. Increased development in the Las Vegas valley will increase urban runoff into the Las Vegas Wash and into Lake Mead. Development of federal lands on the border of federal lands encircling the Las Vegas metropolitan area will likely increase pressures for the construction of flood control structures above those developable lands, e.g. lands administered by the U.S. Fish and Wildlife Service. The Nevada Outdoor Recreation Association opposes any development of public lands that would necessitate the placement of flood control structures on adjoining, protected federal lands.

Air

In the past, the Las Vegas metropolitan area has been classified as a nonattainment area for PM_{10} and carbon monoxide. While some improvement in air quality has been achieved over the years for these criteria pollutants, rapid growth of the Las Vegas metropolitan area will make continued improvement of air quality for these pollutants problematic. Attainment of newly adopted federal air quality standards for ozone and $PM_{2.5}$ will be especially difficult as the Las Vegas metropolitan area grows. Regional haze, which can affect pristine areas like Valley of Fire State Park and the Grand Canyon will increasingly become a problem as the valley grows and fine particulate levels increase in the Las Vegas metroplitan area.

Air quality impacts, from the sale of public lands and the addition of those lands to our inventory of developable lands, must be considered as a part of this EIS process. Past arguments that it is the responsibility of local air quality management agencies, and not the BLM, to make the hard decisions on whether development of additional lands in the Las Vegas valley and additional growth will violate federal air quality standards are weak and questionable. The federal government, i.e. the EPA, has oversight responsibility in seeing that air quality standards are not violated and federal actions that make it more difficult to attain those standards are open to challenge.

The development of some BLM inholdings in the Las Vegas metropolitan area may improve air quality for pollutants, such as PM_{10}, by removing them from the nuisance category. Disturbed, vacant, BLM land may produce fewer PM_{10} emissions if they were developed. Priority should continue to be given to the sale and disposal of BLM inholdings in the Las Vegas metropolitan area.

Future auctions of BLM land, particularly large tracts of land and land within the new, expanded disposal boundries, should not occur until the PM_{10} plan for attainment of National Ambient Air Quality Standards is approved by the EPA.

Infrastructure

Development of BLM lands within the disposal area, particularly those on the perimeter of the valley, will require the extension of roads, sewers, water, utilities, flood control structures, and services. While local cities and the county have a lot of control and discretion over the extension of infrastructure to BLM lands, and local cities and the county have nominated and approved BLM disposals in the past, the disposal of BLM lands adjacent to protected Federal land management units becomes more problematic.

Pressures will increase as the Las Vegas valley develops to place flood control structures, water reservoirs, and transmission lines on adjacent protected federal lands. These structures should be placed on private lands and lands that were converted to private use even though developers will argue that placement of these structures on private lands will diminish their economic potential. Enough pressures already exist on our nearby federal lands from increased use and increased, nearby populations that federal land managers are having increased difficulties in maintaining the resources for the purposes for which they were established.

Open Space, Parks, and Trails

The original boundaries for the Southern Nevada Public Lands Management Act were drawn with an eye towards protection of nearby, adjacent federal lands. Lands with a slope of greater than 15% were omitted from consideration because of: the cost and difficulty in providing services, the impacts on scenic views, and the environmental impacts. Areas with poor soils and areas in flood plains were also omitted for consideration, e.g. those lands in the north and northwest part of the valley. The type of border that would be established with adjacent, protected federal lands was considered with each line drawn around the Las Vegas metropolitan area. Regrettably, some of these considerations were not adequately reviewed and debated in the consideration of the expanded boundaries defined by the Clark County Conservation of Public Land and Natural Resources Act.

There is an obligation, in this EIS, to consider the interface between developed lands in the Las Vegas valley and the adjacent protected federal lands. The BLM still retains a lot of discretion in the disposal of public lands that are adjacent to these federal lands. The BLM should give preference to the establishment of trailheads, trails, parks and the preservation of open space to soften the interface between developed lands and nearby federal natural resource lands.

The Las Vegas metropolitan area already has been ranked low, by national standards, for the parks and open space that are provided to our residents. While some may argue that our nearby open space provided by Federal lands makes up for that low, per-capita figure for parks and open space, the Federal lands were never intended to provide the ball fields, picnic tables, and recreational facilities that people expect in a major metropolitan area.

Illegal dumping, trespass, inappropriate ORV use, and illegal shooting will increase on nearby federal lands as the Las Vegas metropolitan area grows. The BLM should hold off disposal of Federal lands on our perimeter until BLM inholdings have been disposed in the developed metropolitan area and adequate consideration has been provided by the public to consider what the interface between our metropolitan area and the adjacent federal lands looks like. It would be tragic if block walls and major street arterials were to define the boundary of our valley. It would be much better if open space, parks and trails were to define that boundary.

Disposal Process

The BLM has relied on local governments to select public lands, within the disposal boundary, for disposal. One would expect this to be a good means to properly time and locate the disposal of BLM lands within the Las Vegas metropolitan area. Unfortunately, it appears that important large-scale, region-wide, secondary impacts are often overlooked. It often appears as though the RTC and SNWA have been left out of the nomination process because too often it appears that federal lands are being sold long before adequate services can be provided to the area.

An argument can be made that the appraised price of lands eligible for disposal would be increased, and the return to the federal government would be increased, if lands were disposed at such time as services were immediately available to the area. Afterall, one of the reasons the SNWA obtains a percentage of the monies from the sale of BLM lands in the disposal area is

because the argument was made that nearby water provided by the SNWA increased the value of the public land and the SNWA should be compensated for the cost of providing that water to the area surrounding the BLM land.

Again, we belief the preferred alternative chosen as part of the EIS process should limit the immediate disposal of public land to areas where services are readily available, e.g. within one year.

The rate at which federal lands are sold should be a major consideration in this EIS. The rate affects not only progress that is being made on important environmental issues, such as air quality and water, but also the valuation of land. Disposal of too much land could suppress either regionally, or locally, prices of land in the private sector that should be developed. The ability of local governments and agencies to provide services to the area is also affected by the rate of disposal. It appears that there is already a sizable amount of acreage in the private sector available for development. We would argue that the BLM consider decreasing the rate of land sales until a better assessment can be made of the impacts of developing all of the present developable acreage of our environment, infrastructure, and quality of life. This EIS could, and should, provide the basis for such an assessment.

Critical Habitat Protection and the Multi-Species Habitat Protection Plan (MSHCP)

Critical habitat for species, such as the desert tortoise, and the MSHCP were considered at an earlier time before major acts, such as the Clark County Conservation of Public Land and Natural Resources Act, were adopted. This EIS must consider how the expanded boundaries contained in the Clark County Act will affect critical habitat for endangered and threatened species throughout the region, and how the MSHCP may also be impacted. Bear Paw poppy and desert tortoises exist in the lands that were added to the disposal boundary. The Las Vegas buckwheat occurs in the vicinity of Thule Springs State Park and the North Las Vegas airport. Proposed development at Apex, Coyote Springs, El Dorado Valley, Mesquite, and along the I-15 corridor to the proposed Ivanpah airport will only increase pressures on critical habitat that remains as development proceeds in southern Nevada and the region. Disposing of additional federal lands in the area prematurely, without adequate consideration of the impacts on our flora and fauna, will only increase the problems that we will have in preserving endangered and threatened species in the future.

We expect a major discussion of the impacts of increased federal land disposal in Clark County in this EIS.

Cooperate and Development Agreements

A major tool available to the BLM for mitigating impacts from ther disposal of BLM lands adjacent to protected federal lands appears to be cooperative agreements with local governments and development agreements. These tools should be explored through this EIS in considering how the impacts of development approaching protected federal lands could be mitigated.

A track record is slowly being established in the community in which the federal government

appears to be a valued partner with local governments. The regional planning commission has a seat for the federal government. Decisions on the sale of BLM lands in the Las Vegas metropolitan area involves local governments. Decisions of the expenditure of funds from the sale of those public lands involves local governments. The federal agencies are providing resources for trail planning and development with local governments. While development agreements may be something new, and appear to be problematic to the BLM and the federal government, we believe they should be explored through this EIS as a means for ensuring that the boundary between developed private lands and nearby federal lands does not become a major problem in the future.

We would like to see conditions placed on the sale and development of federal land when it is adjacent to nearby federal lands. Potential trail, and other, right-of-ways should be reserved. The establishment of parks and preservation of open space should be encouraged.

Sincerely,

Jeff van Ee

Jeff Van Ee

Western Land Exchange Project
P.O. Box 95545 Seattle, WA 98145-2545
(206) 325-3503 / fax (206) 325-3515
web: www.westlx.org

Jeff Steinmetz
BLM Land Disposal EIS
BLM Las Vegas Field Office
4701 N. Torrey Pines Drive
Las Vegas, NV 89130

November 4, 2003

SUBJECT: Scoping comments on EIS for Las Vegas Valley land disposals

Dear Mr. Steinmetz:

I am submitting these scoping comments regarding the upcoming environmental impact statement for Las Vegas Valley land disposals. The Western Land Exchange Project is a non-profit, public interest-oriented organization that monitors federal land exchanges and conveyances throughout the West and works for policy reform in this area.

We apologize for submitting these comments after the close of the scoping period and appreciate your accepting them. By necessity, we are limiting our remarks to areas of most concern to us and not providing kitchen-sink comments on the scope of the EIS.

First, we are dismayed that the BLM has set a deadline of less than a year to complete a draft and final EIS and Record of Decision for an action that is so widespread and potentially significant. Fast-tracking of this process cannot benefit the public or the environment, but can only have been planned for the benefit of developers and chambers of commerce. The BLM should scratch this deadline and base its EIS process on quality of information and decisionmaking rather than date of completion.

Generally, we are extremely concerned about the rapid pace of land privatization in the Las Vegas Valley following the passage of both the Southern Nevada Public Lands Management Act and the last year's Clark County land bill.

As we understand it, the original intent was that lands released for disposal through the SNPLMA were to be auctioned off over a period of 20 years, which— notwithstanding our broader objections to the disposals— seemed to be a reasonable period of time. However, with the accelerated auctioning of the SNPLMA lands and the addition of more lands in the Clark County bill, we believe the pace of privatization and development is far too rapid. Compilation of this cumulative-effects EIS presents an opportunity to reconsider the wisdom of privatizing all of the lands made available in the bills.

It is important for the BLM to recognize that the SNPLMA and the amendments to the SNPLMA in the Clark County bill that released another 22,000 acres for disposal merely *authorize* the Secretary of Interior to dispose of these lands, they do not *require* it. Therefore, it is within the discretion of the BLM to analyze how much of the land should ultimately be privatized, and even to propose alternatives that would retain some of the

land in public ownership if its conversion to another use is deemed inappropriate or unsupportable. The joint selection process between the BLM and local governments could then proceed.

Local governments no doubt believe that the pace of privatization should be set by their demand, but the broader public interest in these *federal* lands can only be served if the BLM exercises its discretionary authority in this area.

The proverbial forbidden subject in the Las Vegas Valley is the question of whether further development there can possibly be appropriate given issues of water supply, water quality, air quality, and infrastructure. We believe it approaches insanity to release large areas of federal lands in an area where development surpassed sustainability long ago, but we don't expect the congressional delegation and the development interests to have an epiphany any time soon.

We do, however, expect the BLM to act in the interest of public lands and the public at large. As part of this analysis, we strongly urge you to consider an alternative or alternatives that would entail the privatization of significantly less land than the maximum allowed under the SNPLMA and Clark County bill.

Thank you for your consideration.

Sincerely,

Janine Blaeloch
Director

Terri Robertson
6135 E. Carey Ave.
LV NV 89156

October 26, 2003

Bureau of Land Management
LAS VEGAS FIELD OFFICE
4701 N. Torrey Pines Dr.
LV NV 89130
RE: Scoping comments for the EIS on Las Vegas Valley Disposal Boundary actions.

Dear Sir or Madam:

When the original disposal boundary lines were drawn a section of the Tule Springs Dig Site was within the disposal area. When this fact came to the attention of the Friends of Tule Springs Committee a meeting was held with Stan Rolfe. Also in attendance at the meeting were Dr. Donald Touhy, Dr. Richard Brooks, and Dr. Sheilagh Brooks. Dr. Vance Haynes and Dr. Richard Shutler who had both participated in the 1962-63 dig wrote letters in support of the importance of the site that is on the National Register of Historic Places. Dr. Rolfe assured us at the time that the site was not in jeopardy and that BLM would protect and preserve that area. It was my understanding that it would be withdrawn from any sale.

It appears that the entire site is now within the boundary lines for land that can be sold if a request from an entity is made. Whatever steps that need to be taken to withdraw this land from sale, must be done.

I urge you also to handle the new areas of findings by the San Bernardino Museum personnel and others assisting in the land survey with caution and respect. Everything must be done to ensure that these areas are open for scientific study and to public access.

Let's not sell valuable community resources in our quest to sell land!

- Schools, fire stations, police stations, roads, parks, community centers, all should be designated before any land goes up for sale.
- Undeveloped vacant land should be utilized before extending our urban sprawl.

Sincerely yours,

Terri Robertson
Terri Robertson

COMMENT FORM

U.S. Department of Interior
Bureau of Land Management
Las Vegas Field Office

Las Vegas Valley Disposal Boundary Environmental Impact Statement

Copies of comments will be available for public review at the local BLM office during regular business hours. Individuals requesting their personal information be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the appropriate box. Such requests will be honored to the extent allowed by law.

PLEASE PRINT

Name: Bruce Holloway	Organization:
Address: 1505 Frandosa Ln	City:
State: Las Vegas, NV Zip: 89117	Withhold Personal Information: ☒ No ☐ Yes
Add to Mailing List: ☐ No ☐ Yes	Send Copy of EIS: ☐ No ☐ Yes ☐ CD ☐ Print

Comments: I don't think anymore public land should be opened for sale. We have too many youth problems now.

SEND COMMENTS TO:

Mailing Address: LV Valley BLM Land Disposal EIS
PBS&J
2270 Corporate Circle, Suite 100
Henderson, NV 89074-6382

Email Address: lvblmeis@pbsj.com

BLM - LV Field office 10/25/03

Re: Scoping Comments for EIS on LV Valley Disposal Boundary Action

After all the efforts we had made to preserve Tule Springs Dig site. 920 acres is within the new land disposal lines. This Area must be preserved and protected.

Please withdraw it from the land sales area to Preserve this rich heritage Now

Harold Larson
9413 January Dr
Las Vegas NV 89134

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