

February 2, 2018

BLM Southern Nevada District Office  
Southern Nevada District RMP Revision  
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RE: COMMENTS FOR REVISED RMP

Dear Planning Team,

Thank you for the opportunity to provide comments for the upcoming Revised Draft RMP for the BLM's Las Vegas and Pahrump Field Offices and the Draft EIS.

First, nothing stated within this document eliminates, reduces, or diminishes our previous comments submitted to the original draft RMP in late 2014/early 2015. In fact, what we detail below enhances, substantiates, supports, and affirms our original comments. Please continue to use those earlier comments as well as the comments we make below.

Acronyms used:

|      |   |
|------|---|
| RMP  | Resource Management Plan                |
| EIS  | Environmental Impact Statement          |
| BLM  | Bureau of Land Management               |
| DCU  | Diverse Community Use                   |
| ROW  | Right of Way                            |
| VRM  | Visual Resource Management              |
| LWWC | Lands With Wilderness Characteristics   |
| NEPA | National Environmental Policy Act       |
| ACEC | Areas of Critical Environmental Concern |
| TMP  | Travel Management Plan                  |

We will focus these comments on the following major concerns and issues that apply to the overall RMP process and to this RMP as it has been presented to date. These are over-arching concerns that apply to everything and we provide reasons why the impacts are so significant that the only reasonable outcome is a complete revision of the entire RMP. These over-arching issues are:

1. *The absolute lack of a Diverse Community Use Alternative (DCU) that closely resembles the original, traditional Multiple-Use mandate of the BLM* and is not focused on special interest groups, i.e., Alternative 2 (Environmental) and Alternative 4 (Large-Scale Development). This Diverse Community Use Alternative restores balance to public land management by elevating community needs and diverse use to the same level as environmental concerns and large-scale development. Consider the BLM's own mission statement: "The Bureau of

Land Management's mission is to sustain the health, diversity, and productivity of America's public lands for the multiple use and enjoyment of present and future generations." We find these important words **"for the multiple USE and ENJOYMENT"** (emphasis added) in that statement. The obvious conclusion is that at least ONE Alternative should focus on Use and Enjoyment. Indeed, in the mission statement the primary focus of Alternative 2 is found: 'sustain the health and diversity' and the primary focus of Alternative 4 is found: 'productivity'. Where is the Alternative whose primary focus is the multiple use and enjoyment of present and future generations? That Alternative must be added to this RMP.

2. Additionally, People have been left out of public land management actions for too long. *The above Diverse Community Use Alternative also elevates People to the same level as Environment and Development.* Management Actions have two outcomes now; acreage will either protect the environment and restrict the public or acreage will advance large-scale development and eliminate the public from those acres. Two diametrically opposed concepts each produce the same result—restrictions to the public to whom the land belongs. The BLM is a management agency, managing the public land FOR the People, therefore, impacts to the People must be addressed. The original Alternatives do not accomplish that; what the original Alternatives do accomplish is direct, indirect, and cumulative negative impacts to the People and to Diverse Community Use (traditional multiple use). The word 'use' and the word 'enjoyment'—both expressly stated in the BLM's mission statement--directly imply People. Use and Enjoyment are not accomplished through restrictions and over-bearing environmental management actions. And while development is a "use", the focus of development in the current RMP and in BLM management actions is focused on large-scale development. Granted, everyone needs transmission corridors and land disposal packages that do not restrict reasonable growth, but the issue here is that large-scale development (use) is addressed in the RMP whereas small-scale development (use) that most people relate to—is NOT addressed. Examples are access for rural utilities, ROW, Special Recreation Permits to expand rural business opportunities, etc. The People's Use and Enjoyment of their public land must, by the very words in the BLM's mission statement, be a primary factor in all of the RMP, not just in one Alternative.
3. As noted above, People and their use and enjoyment of public lands ARE part of the BLM's mission statement, yet *'people' (man-made features) are routinely removed from our public lands.* Quite simply, this is re-writing history in the west and is seen by many as an end-goal to remove people, and all traces of people, from the land. Land classifications such as VRM Classes I and II or LWWC or wilderness designations provide cover for subjective and arbitrary decisions to remove various man-made features. With relatively minute parcels of private land across the West, it is obvious and apparent that most of the history of the West was written across public land. Yet man-made features are removed routinely and at will. This is an affront to those whose direct history is removed and has a significant and direct impact on those communities and ethnic sub-sets. Tourism and the economic vitality of rural areas, especially, suffer direct, indirect, and cumulative impacts when man-made features are removed because those features are often DESTINATIONS. A group of friends

decides to go ‘check-out’ this or that mine; they buy gas, they stop for lunch, etc. As more and more man-made features are removed, fewer destinations and exploration remain. These impacts are significant, harmful, and the cumulative effect is reasonably foreseeable, yet these impacts are never considered in any analysis.

4. *Indeed, ‘regular history’ is not even listed as a resource or value that is likely to be impacted by a proposed action.* Cultural and Archeological resources are a resource and a value as are Scenic and Recreation, but the accumulated history of small towns and individuals, the essence of the settlement of the West, is not considered a resource or a value. This very action, unto itself, is discriminatory, biased, and is another fatal flaw in the overall process and this RMP. What would happen if an RMP did not consider Native American history or culture as a resource and a value? The varied ethnic sub-sets of European settlement across the West are every bit as important, and every bit as much of a resource and a value. Not considering them and not considering the harmful, significant, and reasonably foreseeable impacts to this resource and value are again, reason enough to require a complete re-start of this RMP process.
5. *The complete lack of not requesting and not incorporating Community Knowledge into the entire RMP process.* Community Knowledge is a concept that includes all communities, all non-traditional, non-science, and non-academic knowledge. Community Knowledge comes from observations and personal experiences over a long period of time, usually cannot be contributed to a single source, and usually comes from trial and error instead of scientific method. Community Knowledge fills in gaps of science, provides unique, localized information, and increases community trust and compliance<sup>1</sup>, yet there is no effort to collect such information and certainly no incorporating of such in any documentation regarding the RMP. A scoping period requesting Community Knowledge should be an integral part of this RMP (and of every NEPA process) and dictates the need and necessity of completely starting over on this RMP process. The impacts to all resources are direct, indirect, and cumulative when Community Knowledge is not used, yet this disdain in regard to observations, personal experiences, localized information and common-sense trial and error is rampant throughout governmental entities. Even the ‘act’ of soliciting and gathering Community Knowledge would be a positive start, but science drives all RMP statements, alternatives, and management actions---again, there is such significant and harmful potential to resources, that not including Common Knowledge is grounds for a re-start on the entire RMP process.
6. *The draft RMP does not consider the Socioeconomic Impacts to rural communities, to rural communities’ traditional and historical values and culture, and/or the ability of rural areas to maintain a functioning, viable, cohesive community.* Exclusively analyzing the socioeconomic impacts to cities, and completely ignoring the socioeconomic impacts of management actions on rural communities produces a one-sided, flawed analysis. The

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<sup>1</sup> “Integrating Community Knowledge into Environmental and Natural Resource Decision-Making: Notes from Alaska and Around the World”, Elizabeth Barrett Ristorph, pages 81-132, Washington & Lee School of Law Journal of Energy, Climate, and the Environment, 2012, published online, Lexington, VA.

socioeconomic impacts of management actions in this RMP—across all current Alternatives—are direct, indirect, and cumulative to rural communities and produce harmful and significant outcomes. None of that has been researched, considered, or incorporated into the RMP, but must be in order to have a complete and full spectrum of socioeconomic impacts. Not only is the economy of small communities adversely affected by management actions on public lands, the societal and cultural aspect is also negatively affected by management actions. Rural communities, in particular, look to their history as a living history. A tiny corral or a family mine are not destinations to those intimately connected to such sites. They are a part of our history, places where we visit, where we take children; this is where we go to celebrate our heritage. Management actions detailed in all the Alternatives allow areas to be closed and allow ‘disturbances’ to be removed without any consideration of the historical value to the local communities. We, who live here know the stories of these places. Their history is intimately woven throughout our lives. More than a destination to visit, more than a day of exploring, we visit these places to connect with our past and to build the bridges between our past and our future so that future generations can come here too—can tell the story of this mine, who worked here, who they married... The RMP literally does not contain one reference to the impacts management actions will have on our small-town economies, our history. Small communities are like the center of a web; in the west small communities are always surrounded by public land. Our history, our communities extend out from the center to the public lands surrounding us; lives, work, hardships, love, and sorrow flow onto the public land surrounding us. Not considering impacts to any of these socioeconomic factors is another reason to restart the RMP at the beginning. Not considering this in each of the Alternatives is an incomplete assessment and makes the entire document flawed.

7. *The assumption that Alternative 3 is the Preferred Alternative because some management actions are taken from Alternative 2 (Environmental) and some are taken from Alternative 4 (Big Development) and then those ‘compromises’ between the two special-interest-group-extremes are what make up Alternative 3, i.e., creating the preferred alternative----*that assumption is fatally flawed. There is much more to managing public land than environmental issues and large-scale developments; essentially all three of the Alternatives focus only on those two concepts. The Preferred Alternative includes some of each. That does NOT make it preferred, a compromise, or a reasonable solution. The Preferred Alternative is still ONLY about environmental protection and large-scale development, just in smaller increments. A small bomb is still a bomb. An Alternative that is not ‘as’ restrictive is still restrictive.
8. *The decision to not consider alternatives that roll back misguided, ineffective, harmful, and expensive management actions is also fatally flawed* as is the incomprehensible decision to continue doing more of the same—that decision being the foundation of much of Alternatives 2, 3, and 4, with Alternative 1 being the ‘baseline’ No Action or Status Quo Alternative from which all other alternatives move forward in one direction—the direction of more restrictions and management actions, not fewer. The RMP must be completely re-written and must consider the full spectrum of Alternatives, including rolling-back

management actions to reflect pre-1998 RMP management actions that were not harmful, did not create significant impacts, and were reasonable. That is the only way to consider the full spectrum of options and alternatives and is the only way of actually considering any and all management actions that may work. For simplicity's sake, we suggest calling this alternative the Pre-1998 Alternative.

9. *Massive land designations and/or classifications that dictate restrictive management actions regardless of harmful, significant, and/or foreseeable impacts must be removed from the RMP.* At the VERY least, an alternative (Diverse Community Use) should be developed that does not include thousands, even hundreds of thousands of acres stamped with a restrictive classification without consideration of significant details, habitat diversity, the existence of man's history upon that landscape, and the need for community, diverse, and recreational use that is a necessary component of public land management. Further, many, perhaps all of the current proposed classifications contain inaccurate statements, exclude relevant information, do not meet the standards by which such classifications should be determined, and/or contain flawed analysis of why those vast acres should be classified as LWWC, VRM Classes I and II, and ACEC's to name a few.
10. *Perhaps the biggest flaw in classifying Lands With Wilderness Characteristics, Visual Resource Management Classes I and II, and ACEC's is that those classifications are in place before a Travel Management Plan is produced.* **IF** areas that contain roads, historical features, scenic areas, and other signs of 'man' upon the landscape are designated LWWC, VRM Classes I and II, and ACEC's and **THEN** a Travel Management Plan is written, **that TMP must necessarily conform to the newly appointed classification**. That 'classification first, TMP second' immediately produces a significant, direct negative impact to public access, multiple use, diverse community use, and motorized recreation. It also produces a harmful and significant cumulative impact to the above as well as socioeconomic direct, indirect, and cumulative negative impacts to rural communities. Not assessing those impacts produces a flawed document. Doing a TMP at the SAME time will produce a more thorough, appropriate, and balanced RMP, one where the public's right to access public land is considered **at the same time** as land classifications. Each Alternative should contain a complete TMP for that Alternative and every existing road that is closed in each TMP/Alternative should have a reason for it being necessary to close that road. That means that Alternatives with LWWC, etc., must identify roads closed and why. The significant and harmful impacts to the public's ability to access their land is reason enough to re-start the entire RMP process since none of these impacts--direct, indirect, and cumulative--have been analyzed.
11. *Travel Management is such an important issue that the details must be clearly stated in each Alternative, for every area.* This will also ensure that the BLM gets substantive comments regarding specific roads and not general statements like 'don't close roads'. When the BLM's plan speaks in generalities and when the BLM's maps are small and don't contain details, you are asking the public to do the impossible by saying only substantive comments will be considered. It is impossible to make a substantive comment about a

boundary or a road if that boundary or road is not clearly defined in the Alternatives. It is a direct, harmful, and significant impact to the public's ability to provide substantive comments when the RMP does not contain specific and detailed information for the public to assess. If an RMP is going to be 2,000 pages long, let those pages be full of detail and not generalities; then, at least, the public can comply with BLM direction and provide meaningful and substantive comments. Not providing details, including all existing roads and clearly identifiable boundaries, is a direct, harmful, and significant impact to the basic NEPA standard of public participation through substantive comments.

12. *Inclusion of 717,000 plus acres of Lands With Wilderness Characteristics into the revised RMP process.* While we deeply appreciate the emphasis on holding public meetings in the rural areas this time around and while we also appreciate the number of BLM staff at each meeting to visit with the public, answer questions, etc., we do have deep concerns about the inclusion of over 717,000 acres into the revision process. Especially in the rural communities, this is no small manner and to a person, everyone felt that something this controversial, with such significant impacts, and involving so many acres, was slipped into this process in the dead of night. Please note that the first and ONLY indication of this increase in LWWC acreage was the inclusion of such on the website on 1-5-18. This was NOT referenced in any of the notices from December 5, 2017 forward. General verbiage about gathering additional public comment for topics including LWWC is mentioned but the first mention of additional LWWC acreage was when the new inventory was dropped into the RMP website on January 5, 2018. And, significantly, there were no additional releases or statements about the new LWWC inventory to call attention to a tripling of the original number of acres proposed for LWWC designation. Tripling acreage is significant even when it is not controversial; when it is controversial (as the BLM is aware, based on many public meetings with many comments indicating such), it is unconscionable that the BLM did not highlight this issue. All of this does nothing to improve the relationships between rural residents and the BLM. Therefore, the immediate, direct impact of the handling of the addition of 717,000 plus acres of LWWC in this comment period is a further deterioration of public support and trust. That is a direct and cumulative impact on public land management—again, an over-arching condition that is so significant it calls for a re-start to this entire RMP process.

In summarizing the above outline, the only solution to resolving all of the above is to completely start over with a new RMP, including a new scoping process, and a draft RMP that includes a full range of alternatives including a pre-1998 Alternative and a Diverse Community Use Alternative; that includes a fully developed Travel Management Plan that accompanies the RMP and goes through the entire process at the same time; that includes a thorough socioeconomic study of rural areas; that includes Community Knowledge with an extensive public outreach campaign to inform citizens of such; that includes Community Knowledge scoping comments and then actually incorporates such into the RMP and the Alternatives; that elevates our ethnic sub-sets' history and culture to an equal with cultural and archeological; that evaluates the impacts to our history's resources and values as the RMP already does for cultural and archeological; and finally that includes detailed, complete maps so that any boundaries of any land classification or designation can be easily seen as well as current features, topography, all existing roads, and historical features. THEN the public can make informed, appropriate comments and

THEN the public can start to be a supporting and willing partner to the BLM---a relationship that will ultimately benefit habitat and species to a greater degree than most management actions.

#### **SPECIFICS:**

##### **1. Lack of a Diverse Community Use Alternative (DCU).**

In our original comments in early 2015, we expressed our concerns about no Alternative focused on Multiple Use. Since that time, we have found that the term ‘multiple use’ has been cleverly co-opted so that wilderness use is presented as ‘multiple use’ because you can hike and camp in wilderness areas. Multiple Use is NOT 2 uses; it is many uses—uses that haven’t even been thought of yet—an example being solar energy which wasn’t even discussed in the 1990’s, but today it is a use.

It is time to define the traditional meaning of multiple use—the concept upon which the BLM was founded with a modern new name that hasn’t been co-opted to support restrictive designations. **Diverse Community Use** means all the nuances of the traditional definition including grazing, mining, recreation, etc. But DCU also means the uses of public lands that benefit small communities. Take for example, utilities for small communities. Their budgets are quite small; they do not have the money to hire full time attorneys, lobbyists, staff to write environmental documents, etc. The end result is always years, even decades, of plodding away with countless letters and meetings, a never-ending file of postponements, being bounced to a different department or agency, re-filings, more rounds of meetings.....it is endless, drains the small utilities of any reserve money they might have, and ultimately most utilities run out of money and/or time and give up.

Small utilities must fight and claw for an inch of permission to use public land to provide essential services to their customers? This is incomprehensible .... and it certainly doesn’t happen to Nevada Energy or Southern Nevada Water Authority. They have the money to find a way; they have the influence to clear a way, and they get right of ways and whatever they need for their customers while the small utilities do not. Therefore, DCU includes community uses such as utilities. It also includes uses on public lands that can increase the number of small businesses in rural areas. Once upon a time, most rural towns had enough grazing and mining going on around them to support the small businesses and services that most areas need—gas stations, hardware, groceries, a Dr., a small school....But guess what happens to ranchers and miners after years and decades of environmental groups fighting such traditional uses.....they, like the small utilities, run out of money, get tired of spending more time doing paperwork than working their cattle, etc. Ultimately, they give up and when enough ranches and mines surrounding small towns go away, that town starts to go away also. Is it the intention of federal agencies--with their RMPs focused on 2 special interest groups: environmental (Alternative 2) and large-scale development (Alternative 4), these being the ‘standard’ alternatives in most RMPs, along with the preferred Alternative 3—which is a combination of 2 & 4—the proverbial ‘compromise’---IS IT THE INTENTION OF FEDERAL AGENCIES to eliminate small communities throughout the west? Because it is working. Without an Alternative specifically for DCU, this assault on traditional multiple use, on small communities and small businesses, on the culture and history of rural areas, on the very lifestyle that settled the west, the carcasses of small communities across the western landscape will continue to pile up.

Therefore, the RMP must be re-started and an DCU Alternative must be included as the impacts, just some of which are noted above, are **direct** (ability to access water rights denied or access to do repairs is denied), are **indirect** (when communities don’t have enough water to

service customers and growth stops, when all ranching and mining are eliminated on public land surrounding rural communities and the economic input needed to keep needed businesses going dries up), and are **cumulative** (without the economic input of ranchers, miners, OHV races, etc., the local businesses like gas stations and grocery stores go out of business, with no businesses, there is no work and people move away). These direct, indirect, and cumulative impacts are harmful, significant, and reasonably foreseeable and a DCU Alternative must be developed to address those impacts.

A DCU Alternative is also needed because without it, the direct impacts to individuals, to recreation, to our history, are also significant. Consider motorized recreation alone. On page 65 of the Socioeconomic Baseline Report, total OHV use from 10-2009 through 09-2010 is 821,882; that is more than half (55%) of ALL recreation uses. When you add the category 'driving for pleasure' to the OHV total, it is 1,003,274 participants, easily more than 2/3's of all recreation use is motorized. Recreation is how most of the public use public lands; public lands mean recreation to almost everyone and easily more than 2/3's of all surveyed recreationalists consider themselves motorized recreationalists. Where is the Alternative representing this use? It isn't in Alternative 2, or 4, or even 3. Therefore, the DCU Alternative, being the 'multiple use' Alternative also includes recreation and especially includes motorized recreation.

And elevating our history to the same value as cultural, archeological, and even scenic is necessary because our history has no value currently. It is not considered a resource either, as is cultural. Therefore, the DCU Alternative must also consider our history as the current RMP with the special interest group focused alternatives is incomplete and will have harmful and significant impacts to our history.

The DCU Alternative includes many other uses, as mentioned earlier, even uses we haven't thought of yet and the DCU Alternative represents the actual mission statement of the BLM---it is multiple use and it is for the use and enjoyment of current and future generations. A completely new RMP with a DCU Alternative is necessary and the RMP is incomplete, biased, and flawed without a DCU Alternative.

## **2. People are not 'equal' to the environment or development---The Human Environment.**

NEPA requires federal agencies to prepare a detailed study on any impacts of any proposed action that may "significantly affect the quality of the human environment". Yet so little of the RMP is actually focused on the human environment. All the restrictive land classifications directly impact the rural human environment. As you already know, it is a visceral, emotional reaction when we see land classifications and designations whose priorities are strictly environmental, with little room for people.

Land classifications and designations have resulted in many impacts to the quality of our human environment already. When the entire Sheep Range was designated a Refuge, no one paid attention to our concerns---that of not being able to access our important places anymore. Why is this so easily dismissed? What is so hard to understand? Federal agencies understand it when Native Americans say, 'that place is special to us'. Why aren't our special places afforded equal protection and concern? Yet that is what happened and continues to happen even with this RMP. The significant negative impacts to the quality of OUR human environment must be addressed with a new Alternative focused on multiple use and Humans.

We do not want the rest of our public land to negatively impact us like the designation of the Sheep Range where the priorities for managing that land changed from traditional multiple use to that of protecting species. This resulted in the main road to Sheep Mountain off of Highway 93 (near current Coyote Springs) being closed. That was the main access point to rural residents in Moapa Valley (20-30 miles), who now, just to get to Sheep Mountain, must



drive 80 plus miles to the other side of Vegas. And access to the old corrals that have historical significance to many, not to mention the sawmill—of incredible historical importance to the entire region---motorized access to those areas is gone. Why? Because land designations changed, which created new priorities which negatively affected the quality of our human environment. Hence the necessity of an Alternative that focuses on the quality of the human environment, on People, and on Multiple Use.

3. **Our history must be treated as an equal to Cultural and Archeological resources in the RMP**

**Alternatives.** Our history must be considered a value just as is cultural and archeological resources are considered values in the RMP. Not doing so is biased and is an incomplete assessment and produces a flawed analysis of any impact on any management action. The new inventory of LWWC is evidence of an incomplete assessment and the stated 'fact' that these lands qualify as LWWC is a flawed analysis BECAUSE it does not consider our history to be of equal value and as an equal resource to cultural and archeological resources. This is insulting and is a direct negative impact to the rural communities, to our shared history, and to our culture.

This is, in a very real way, the complete disregard for the settlement of the West by the varied sub-ethnic groups of pioneers who settled the West. As most of the West is public land, necessarily, our history is ON public land. Rural residents, descendants of settlers, and newcomers who appreciate and respect our history and culture DO NOT want to be cut off from that history. See the reference to the sawmill in the above section. That sawmill produced most of the timber that the settlers in this area used to build their homes. A simple dirt road led up to the sawmill in Sawmill Canyon, yet that road had to be closed when a land designation, Refuge, made the protection of species more of a priority than people being able to access their history. This unequal, biased, flawed assessment of our history as the lowest rung on the ladder cannot be tolerated any longer. Every impact, every management action must evaluate our history and assess those impacts as the current RMP does 'cultural' and 'archeological' AND the management actions must respect our culture in which our history is living and IS to be visited and shared. Traditional access to our history and culture must be a management action and a priority. An alternative must be developed that includes this as a priority, again, an Alternative for DCU, traditional use, and multiple use, and an Alternative that does not remove access must be developed to address the direct and cumulative impacts to our history and our ability to visit it.

4. **The socioeconomics of rural communities were not analyzed in the Socioeconomic Baseline Report for the Draft RMP and EIS.**

Page 2, "The Socioeconomic study area has been defined to include all of Clark County and Nye County". However, with just the briefest mention of Mesquite and the Paiute Tribe in Moapa, 99.9% of the 102-page report does not include information or analysis of approximately 25% (not including the Nevada National Security Site) of Clark County—that area defined as northeast Clark County from roughly Highway 93 to Apex to Lake Mead and the borders of Arizona and Lincoln County.

Since Clark County consists of the largest urban area in Nevada, surrounded by public land with a few rural communities, a socioeconomic report that is overwhelmingly about Las Vegas, plus a bit about Nye County, but almost completely fails to address the uniquely different small rural communities is flawed and incomplete and needs to be completely re-written to reflect the polar opposites of the urban and rural areas and NOT the absorbing of the rural areas into the urbanized portion of Clark County.

This inclusion of the rural areas into the urban analysis is even more puzzling when one reflects on the need for this socioeconomic report---the need is to analyze socioeconomic conditions AS THEY RELATE TO THE RMP, i.e., as they relate to public land, not statistics about Las Vegas. We understand the necessity of presenting factual information provided by the US Census and other sources in order to lay the foundation of this report, but the body of this report should be about the socioeconomic impacts of public land on the communities and the interface/interaction of those communities upon the surrounding public lands. In this report, every community should have equal mention, not the report being all about Las Vegas.

This is especially true when discussing and analyzing the 'socio' part as in that area, the differences are so vast that a complete discussion of such would take several chapters, not a couple of sentences. The Oxford Dictionary defines "socioeconomics" as "relating to or concerned with the interaction of social and economic factors". However, in reading this socioeconomic report, we see virtually all the report devoted to the economic factors and hardly any of it devoted to the social factors---and essentially none of it devoted to the interaction of the social and economic factors. And therein lies the problem. This report is incomplete, presents, almost exclusively, details about urbanized economic factors, does not address the distinction between urban and rural, and does not analyze ANYTHING---but rather reports statistics. These issues make the report fundamentally flawed and it must be rewritten and the RMP re-started.

Ultimately then, this report inflicts direct impacts to all the rural communities because nothing written is devoted to rural communities but is instead focused and condensed to the urban area. Other direct impacts are: no discussion of unique rural issues such as ROWs, pipe lines, easements for water resources and tanks and access for rural utilities to perform maintenance work; no analysis as to the impacts of severe restrictions imposed on BLM land for the Desert Tortoise and no analysis as to whether these restrictions (no mining, no grazing, no SRP, etc. in Desert Tortoise ACECs) benefit, have no effect, or have a negative effect upon the Desert Tortoise.

Additionally, this report should detail and analyze the direct impacts to the economies of rural communities by current RMP management actions and the RMP should detail and analyze impacts in each of the Alternatives in the upcoming RMP. Additional details and analysis should be included regarding the direct impact of current management actions on the social aspects of rural communities and the RMP should detail and analyze impacts in each of the Alternatives in the upcoming RMP. The rural public has the right to know what kind of impacts to expect.

As noted above, in the social analysis of direct impacts to the rural communities, our history, our culture, and the culture of the settlement of the West must be included. This part of the West did NOT begin with Las Vegas, but rather the settlements along the Muddy and Virgin Rivers and along the Meadow Valley Wash and Colorado River. The direct impacts to our history need to be analyzed as part of the social factors relevant to rural communities.

This report also has direct impacts to the rural communities because the future needs of rural areas are not discussed, considered, opined about, or even mentioned. Great detail is provided for large renewable energy projects, transmission corridors, etc., but there is no mention of current and future utility needs of rural areas; this directly affects rural utilities management costs, business plans, and ability to grow and respond to community growth. Not being able to guarantee services to new customers directly impacts other rural businesses as well. The cumulative impacts of neglecting the economic and the social factors to the rural communities regarding public land management actions in this report makes this report one-sided, biased to urban factors, incomplete, and inaccurate.

**5. Massive land designations and/or classifications that dictate restrictive management actions.**

The current draft RMP and the newly added LWWC is so anti-multiple use that it is hard to actually comprehend. Consider this, the BLM manages about 3.1 million acres that this RMP encompasses, but the total of the LWWC, ACECs, and VRM Class I and II equal over 4 million acres. Clearly some restrictions overlap. Where is the multiple use land? Is there any left?

a. Restrictive land classifications are:

- i. Lands With Wilderness Characteristics, LWWC. 242,214 acres were proposed in the original draft of 2014. Now an additional 717,821 acres have been added to the LWWC resulting in a total of 960,035 acres of LWWC.
- ii. Areas of Critical Environmental Concern, ACEC. The original draft proposed 1,444,548 acres either remain ACEC or become ACEC.
- iii. Visual Resource Management, Classes I and II, VRM. 1,622,401 acres proposed.
- iv. The total of the 3 above restrictive land classifications is 4,026,984. As the BLM manages 3.1 million acres in the same area, clearly a million acres are going to have several restrictive land classifications.

In recent public meetings, we learned that LWWC CAN be managed as multiple-use lands to some extent, but the problem with designations is that the priorities and values that any land designation is stipulated to protect, can be enforced, especially with different district managers, etc. Therefore, although we strongly urge any and all acreage that ends up being designated LWWC be managed as it is now—multiple use, we are not comfortable at all with thinking that will last. Once any acreage carries a designation, it ultimately can be managed to the most restrictive criteria of that designation. Ultimately, given the direct impacts of such designations to the rural communities, it isn't enough to say manage LWWC as multiple-use, it must be no LWWC designations as this land around the rural communities must be managed as multiple use to avoid the direct and cumulative impacts of restrictive designations on rural life.

In our comments in 2015, PIC clearly stated evidence, reasoning, and analysis that showed where ACECs did not meet the Importance Criteria or Rationale for Determination Criteria. We expect those comments to carry forward and to be applied to the revised draft.

In our comments in 2015, PIC clearly stated evidence, reasoning, and analysis that clearly showed where LWWC designations were not appropriate and indeed did not qualify for that designation. We expect those comments to carry forward and to be applied to the revised draft RMP.

In our comments in 2015, PIC clearly stated evidence, reasoning, and analysis that showed where VRM Classes I and II were flawed, discretionary, biased, and not appropriate. We expect those comments to carry forward and be applied to the revised draft RMP. Regarding the new LWWC, we find the same issues as in our original comments. Without repeating everything, please again consider the following:

The BLM admits "Assessing scenic values and determining visual impacts can be a subjective process". That could possibly qualify as the understatement of the year. And that is another fatal flaw in this entire Visual Resource section. What your eyes see and what you like (as you assess scenic values) can easily be different than what I see and assess. Is the BLM really asking the public to adopt one person's subjective assessment of all 3.1 million acres in southern Nevada? Because it really does come down to that; sure, there are definitions and scoring parameters, entire handbooks dedicated to describing the nuances of assessing visual resources and scenic values, but staff people are the ones going out and assessing areas. They come back

and managers either OK their assessments or modify them—then those assessments and scenic values are sent up the chain, cut and pasted into the different alternatives and then the public is asked to accept such.

From recent public meetings we have learned that the original wilderness inventories considered desert shrub to not provide enough solitude as does forested areas; now it has been determined that low shrubs, etc. do provide solitude.

We will provide detailed analysis of every LWWC in northeast Clark County when the draft is released; for now, we once again point out that restrictive designations around the rural communities have a direct and cumulative impact as those designations do require the land to be managed with more restrictive management actions as opposed to multiple use management actions. Therefore, we once again state that these lands are not of wilderness quality and should remain as multiple-use lands. At the very least, the DCU Alternative should not include any restrictive land designations but should include management actions for multiple use.

And, regarding the reason behind these additional LWWC designations, we find that to be purely political. On December 22, 2010, in Order No. 3310 (referencing how and why the BLM shall inventory all BLM land for wilderness characteristics), Salazar writes this, “The BLM should develop recommendations, with public involvement, regarding possible Congressional designation of lands into the National Wilderness Preservation System.” And in a letter dated 6-1-2011, Secretary Salazar, referencing Order No. 3310 states, “...the Dept. of the Interior will be soliciting input from members of Congress, state and local officials, tribes, and Federal land managers to identify BLM lands that may be appropriate candidates for Congressional protection under the Wilderness Act. I am directing the Deputy Secretary to work with the BLM to deliver a report to me and to congress regarding those areas.”

#### **6. Travel Management Plans must be done at the same time as the RMP.**

Again, as we stated in our original comments, doing TMPs after the RMP necessarily dictates analyzing EVERY road under designation of that land area. The RMP contains a multitude of special designations, all of which provide much higher levels of restrictions and all of which manage for preservation above multiple use; these designations, once finalized, will dictate what happens to everything in that area, including roads. Why is the Travel Management Plan NOT included in the RMP? As is planned now, the RMP will impose designations that will necessarily dictate road closures. Why won't the BLM take an additional year and collect the data (with the public's help) to develop a Travel Management Plan that will be part of the RMP instead of finalizing special designations first that will mandate road closures to satisfy the restrictions imposed by special designations.

This RMP must be put on hold until a travel management plan is developed and incorporated into the RMP and its alternatives; the process is fatally flawed without that key element incorporated at the same time as special designations are considered. Doing one without the other makes no sense. All travel management, all designations of roads open or closed will depend on the designations of the lands those roads go through. Therefore, the individual roads and the area designations must be done at the same time. To do the designations first, literally sets up the road designations to be controlled and restricted by the special designations this RMP will impose on those lands.

Not doing the TMP *at the same time* as the RMP is a direct impact to the public. Most of the public does not realize the implications of restrictive land designations; they do not know that once land has been designated, then all management actions, including route designations, must conform to the restrictive land classifications or designations. Finding this out too late, is a direct negative

impact to the public and public land should not be managed without the public's full understanding of the implications of land designations and classifications. Doing the TMP at the same time as the RMP would eliminate confusion, lack of information, and misunderstanding of the consequences of designations. The public must have transparency and a full understanding of the consequences of land designations.

That 'classification first, TMP second' immediately produces a significant, direct negative impact to public access, multiple use, diverse community use, and motorized recreation. It also produces a harmful and significant cumulative impact to the above as well as socioeconomic direct, indirect, and cumulative negative impacts to rural communities. Not assessing those impacts produces a flawed document. Doing a TMP at the SAME time will produce a more thorough, appropriate, and balanced RMP, one where the public's right to access public land is considered **at the same time** as land classifications. Each Alternative should contain a complete TMP for that Alternative and every existing road that is closed in each TMP/Alternative should have a reason for it being necessary to close that road. That means that Alternatives with LWWC, etc., must identify roads closed and why. The significant and harmful impacts to the public's ability to access their land is reason enough to re-start the entire RMP process since none of these impacts--direct, indirect, and cumulative—have been analyzed.