



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 9, 2008

Cynthia T. Martinez
Complex Manager
Desert National Wildlife Refuge Complex
4701 N. Torrey Pines Drive
Las Vegas, NV 89130-5450

Subject: Draft Environmental Impact Statement for the Desert National Wildlife Refuge Complex Comprehensive Conservation Plan, Clark, Lincoln, and Nye Counties, Nevada (CEQ #20080262)

Dear Ms. Martinez:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA supports the purpose and goals of the Comprehensive Conservation Plan and the preferred alternatives for each of the four refuges. We believe that the more extensive efforts to improve and protect habitat for plants and wildlife included in the preferred alternatives will be most beneficial to those species that depend upon the refuge habitats. We also support adaptive management in efforts to minimize temporary adverse impacts to listed species during activities such as eradication of invasive species. We have, therefore, rated this Draft Environmental Impact Statement (DEIS) as LO, *Lack of Objections*. Please see the enclosed *Summary of EPA Rating Definitions* for a description of our rating system.

There are a few items that EPA recommends be clarified in the Final Environmental Impact Statement (FEIS):

- The Nevada Department of Transportation and the Federal Highway Administration (FHWA) have initiated an environmental review process for the Sheep Mountain Parkway, a proposed transportation corridor that may be located near the southern border of the Desert National Wildlife Refuge (DNWR). This project should be included in the cumulative impact discussion, and its potential impacts considered in planning for the DNWR. We also encourage DNWR staff to participate in the Sheep

Mountain Parkway planning process. Information about this project can be obtained from Abdelmoez Abdalla of FHWA at 775-687-1231.

- The DEIS states that the Las Vegas Valley Airshed is considered nonattainment for carbon monoxide and particulate matter less than 10 microns. The Las Vegas Valley airshed is also in nonattainment with the 8-hour ozone standard. Please contact the Clark County Department of Air Quality Management for current information on attainment status and state implementation plans for these pollutants and include this information in the FEIS.
- The DEIS states that “[e]ach of the refuges in the Desert Complex has potential to contain paleontological resources based on the geologic units that have been mapped.” However, the *Environmental Consequences* chapter states that paleontological resources would not be affected by the Proposed Action, and no discussion of potential impacts is included. Please clarify why these potential resources would not be impacted by activities such as earthmoving associated with habitat restoration and facility construction.

We appreciate the opportunity to review this DEIS, and request a copy of the FEIS when it is officially filed with our Washington, D.C., office. If you have any questions, please contact Carolyn Mulvihill of my staff at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

Enclosure: Summary of EPA Rating Definitions

cc: Abdelmoez Abdalla, Federal Highway Administration