



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

April 13, 2010

Bob Ross
Field Manager
Las Vegas Field Office
Bureau of Land Management
4701 North Torrey Pines Drive
Las Vegas, NV 89130-2301

Subject: Draft Supplemental Environmental Impact Statement (DSEIS) for Upper Las Vegas Wash Conservation Transfer Area, Las Vegas, Nevada (CEQ# 20100009)

Dear Bob Ross:

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 our NEPA review authority under Section 309 of the Clean Air Act.

We have rated Alternative B, the Preferred Alternative, as Lack of Objections (LO) because this alternative keeps the natural functions and hydrology of the Upper Las Vegas Wash (ULVW) intact, preserves sensitive resource values, and provides opportunities for recreation, education, and research. EPA supports the selection of Alternative B as the preferred alternative. This alternative appears to be fully consistent with the authorizing legislation, the Southern Nevada Public Lands Management Act (SNPLMA), and its mandate to promote the preservation of natural, scientific, aesthetic, historical, cultural, watershed, wildlife and other values; enhance recreational opportunities and public access; and provide the opportunity to achieve better management of public land through consolidation of Federal ownership.

We note that Alternatives C through E and the No Action Alternative would disrupt the natural functions of the ULVW by allowing development that could displace waters flowing down Sheep and Las Vegas ranges, upper alluvial fans, and in the active wash channel (p. 16). These alternatives would significantly increase sediment loss, increase peak flows and associated erosion, requiring modifications to infrastructure to accommodate large flood events and the construction of flood control structures that are likely to result in considerable alterations to the

shape, depth, and channelization of the ULVW (p. 130). These alternatives would also have significant adverse impacts due to the loss of high-potential or occupied habitat for sensitive vegetation species (p. 135), and the increased potential for removing or burying of significant cultural or paleontological deposits (p. 128).

DSEIS maps show many parcels of Bureau of Land Management land within the urbanized Las Vegas Valley area which could be disposed to accommodate the needs of future urban growth and development. EPA advocates smart growth principles in development planning where development serves the economy, community, and the environment. We urge the Bureau of Land Management and the Las Vegas Valley communities to design urban development to minimize air quality impacts, preserve watershed functions, and maintain water quality. For instance, consider increased density in development plans; preservation of large, continuous open space areas; preservation of wetlands, floodplains, riparian corridors, and other critical ecological areas; and minimization of overall land disturbance and impervious surfaces associated with urban development.

We recommend the Final SEIS contain additional information on monitoring and enforcement measures that will be implemented to avoid and minimize adverse impacts from Off-Highway Vehicle users, fossil hunters, feral pets, hikers, bicyclists, and increased public visitation afforded by increased access. A map illustrating frequently referenced sites and infrastructure, such as the Decatur Detention Dam, Eglington Preserve, and east-west diversion berm, would help in providing an understanding of the physical and land use context of the proposed Conservation Transfer Area boundary.

We appreciate the opportunity to provide comments on the DSEIS. Please send one hard copy and one CD of the Final SEIS to the address above (mail code: CED-2) at the same time it is officially filed with our Washington D.C. Office. If you have any questions, please contact me at (415) 972-3521, or contact Laura Fujii, the lead reviewer for this project. Laura can be reached at (415) 972-3852 or fujii.laura@epa.gov.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division