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BLM LVFO RMP REVISION COMMENTS for Chapter 2

by

Laughlin Economic Development Corporation

February 6, 2015

Introduction:

The Laughlin Economic Development Corporation ("*LEDC*") is submitting these comments regarding the Laughlin Township portion of the Draft Resource Management Plan ("*RMP*") and Environmental Impact Statement ("*EIS*") in conjunction with the related Public Comment Period ending February 6, 2015 (the "*Comments*").

The purpose and intent of the Comments overall is generally to encourage, promote and facilitate sustainable economic growth for Laughlin, through economic development and the creation of jobs and tax base revenues, while achieving a reasonable amount of local control over its destiny for future generations over decades to come. In that context and being of most relevancy, the Comments are almost exclusively directed at that portion of Laughlin south of NV Highway 163.

The Comments are generally focused on and supportive of Alternative 3, as described in Chapter 2 of the Draft RMP/EIS. The Comments are based on, and referenced from, Alternative 3 Maps on the following pages, with specific modifications proposed for Laughlin in conjunction with the above purpose and intent. The specific RMP/EIT elements proposed for modification herein are listed in the "Contents" portion of this Page 1, and all others are presumed to be acceptable to the LEDC. In some instances, further explanation of the specific benefits of certain designations to Laughlin, and the relationships between related topics, are included on the related pages. It is noted that, the Comments are general in nature, and no attempt has been made to edit or propose specific text or language modifications in conjunction with those general concepts, assuming such text revisions would be made in the final version of the updated RMP/EIS.



LEDC Proposal: For Laughlin <u>Areas of Critical Concern</u>, keep ACEC Alternative 3 as is, except delete the existing area designated as "Desert Tortoise" south of NV Highway 163, generally as shown above. <u>Note</u>: This is actually a proposal to <u>extend</u> the existing Laughlin exclusion to accommodate future growth and better utilization of other resource through "modification" of the stipulated area by the Authorizing Officer, per Section C.10.6 Desert Tortoise Habitat of the Draft RMP/EIS. It's also noted that this is a relatively small exclusion, and other similar areas, such as Spirit Mountain, Searchlight and other small communities, are also exempted from this designation.



LEDC Proposal: For Laughlin <u>Fire Management Unit</u>, keep FMU Alternative 3 as is, except delete the existing area designated as "Fire Management Unit" south of NV Highway 163, generally as shown above. <u>Note</u>: Protection of all ACEC areas is one of the key FMU focuses, and the proposed deletion herein of the ACEC (Desert Tortoise) area south of NV Highway 163, along with the existing Laughlin community fire protection provided by the Clark County Fire Department, substantiates this proposed FMU modification.



LEDC Proposal: For Laughlin *Disposal Boundary*, keep Disposal Boundary Designation Alternative 3 as is, except add the additional area designated as "*Disposal Boundary Alt. 3*" west of and adjacent to the Southland 9,000 Acres, generally as shown above and designated as "*BLM Development Area*" on the following map, consisting of APN 263-00-002-014, 263-00-002-015, 263-00-002-016, 266-00-001-001, 266-00-001-002, 266-00-001-003, 266-00-001-004, PT266-00-001-005, 266-00-001-006, 266-00-001-007, 266-00-001-012 & 266-00-002-001. <u>Note:</u> This proposed new Disposal Area will allow future Solar, Wind and other resource development consistent with stated purposes and intents.





LEDC Proposal: For Laughlin <u>Minerals – Fluid Leasable</u>, keep Fluid Leasable Alternative 3 as is, except extend the existing area designated as "*Open*" westward to include that area bounded on the north by NV Highway 163, on the west by US Highway 95, and on the southwest by the NV State line, generally as shown above. <u>Note</u>: This expansion is consistent with the stated purposes and intents for locally controlled economic growth.



LEDC Proposal: For Laughlin <u>Minerals – Locatable</u>, keep Locatable Minerals Alternative 3 as is, except extend the existing area designated as "*Open*" westward to include that area bounded on the north by NV Highway 163, on the west by US Highway 95, and on the southwest by the NV State line, generally as shown above. <u>Note</u>: This expansion is consistent with the stated purposes and intents for locally controlled economic growth.



LEDC Proposal: For Laughlin <u>Minerals – Saleable</u>, keep Saleable Minerals Alternative 3 as is, except extend the existing area designated as "*Open*" westward to include that area bounded on the north by NV Highway 163, on the west by US Highway 95, and on the southwest by the NV State line, generally as shown above. <u>Note</u>: This expansion is consistent with the stated purposes and intents for <u>locally</u> controlled economic growth.



LEDC Proposal: For Laughlin <u>Minerals – Solid Leasable</u>, keep Solid Leasable Alternative 3 as is, except extend the existing area designated as "*Open*" westward to include that area bounded on the north by NV Highway 163, on the west by US Highway 95, and on the southwest by the NV State line, generally as shown above. <u>Note</u>: This expansion is consistent with the stated purposes and intents for locally controlled economic growth.



LEDC Proposal: For Laughlin <u>Off Highway Vehicles</u> (aka, Off Road Vehicles) in conjunction with the Travel Management Area Map and related Travel Management Plan, keep OHV Designation Alternative 1 as is, except extend the existing area designated as "Limited to Existing Roads, Trails and Dry Washes" westward to include that area bounded on the north by NV Highway 163, on the west by US Highway 95, and on the southwest by the NV State line, generally as shown above. <u>Note</u>: This expansion is consistent with the stated purposes and intents for locally controlled economic growth stimulated by the expansion of proven recreational activities.



LEDC Proposal: For Laughlin <u>Solar Energy</u>, keep Solar Energy Alternative 3 as is, except change the areas designated as "*Exclusion*" south of NV Highway 163 to be "*Proposed Solar Energy Zone*," generally as shown above. <u>Note</u>: This proposed re-designation is consistent with the stated purposes and intents for locally controlled economic growth for this area, which is rated 6.5-7.0 out of 10 by the National Renewable Energy Laboratory for potential solar energy generation, and which includes the existing and proposed Disposal Areas herein.



LEDC Proposal: For Laughlin <u>Wind Energy</u>, keep Wind Energy Alternative 3 as is, except change the areas designated as "*Exclusion*" south of NV Highway 163 to be "*Open*," generally as shown above. <u>Note</u>: This proposed re-designation is consistent with the stated purposes and intents for locally controlled economic growth for portions of this area, which is rated Fair to Outstanding by the National Renewable Energy Laboratory for potential wind energy generation, and which includes the existing and proposed Disposal Areas herein.



LEDC Proposal: For Laughlin <u>Recreation Management Area</u>, keep RMA Designation Alternative 3 as is, except extend the existing area designated as "Laughlin SRMA" westward to include that area bounded on the north by NV Highway 163, on the west by US Highway 95, and on the southwest by the NV State line, generally as shown above. <u>Note</u>: The Laughlin Special Recreation Management Area (SRMA) is intended to provide both selected motorized and non-motorized recreational activities, including geological, wildlife and wilderness touring, viewing and enjoying, in conjunction and consistent with the proposed Off Highway Vehicle Area and Travel Management Area herein.



LEDC Proposal: For Laughlin <u>Travel Management Area</u>, keep TMA Alternative 3 as is, except extend the existing area designated as "Laughlin TMA" westward to include that area bounded on the north by NV Highway 163, on the west by US Highway 95, and on the southwest by the NV State line, generally as shown above. <u>Note</u>: The Laughlin TMA is a planning and management tool for addressing area-specific travel issues, including those associated with the Off Highway Vehicle Map and Recreation Management Area herein and a related Travel Management Plan. In that context, it is appropriate for the area designations to be consistent.



LEDC Proposal: For Laughlin <u>Utility Corridor</u>, keep Utility Corridor Alternative 3 as is for Utility Corridor #12 & #21, except add Utility Corridors for existing "500 kV," "230 kV" and "69 kV" Transmission Lines, generally as shown above and designated on the following *Existing Transmission Lines* map respectively as "Southern California Edison Co., Griffith Energy Project-1 to Lugo," "Western Area Power Administration, *McCullough to Davis*" and "Existing AMPS Line, 69 kV." Note: These existing Utility Corridors should be part of the RMP/EIS.





LEDC Proposal: For Laughlin <u>Visual Resource Management</u>, keep VRM Alternative 3 as is, except make the areas designated as "VRM Class I, II & III" south of NV Highway 163 to be "VRM Class IV," with Utility Corridors designated "VRM Class III," generally as shown above. <u>Note:</u> These designations are consistent with the stated purposes and intents for locally controlled economic growth stimulated by responsible expansion of the community and use of the land, and are consistent with all of the other RMP/EIT elements considered herein.