

US EPA ARCHIVE DOCUMENT



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

December 1, 2011

Ms. Linda M. Cohn, SWEIS Document Manager
NNSS Nevada Site Office
U.S Department of Energy
P.O. Box 98518,
Las Vegas, Nevada 89193-8518

Subject: Draft Site-Wide Environmental Impact Statement for the Continued Operation of the Department of Energy/National Nuclear Security Administration Nevada National Security Site and Off Site locations in Nevada (CEQ# 20110241)

Dear Ms. Cohn:

The U.S. Environmental Protection Agency has reviewed the Draft Site-Wide Environmental Impact Statement for the continued operation of the Department of Energy/National Nuclear Security Administration Nevada National Security Site and off site locations in Nevada. Our comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and our NEPA review authority under Section 309 of the Clean Air Act.

We have rated all alternatives in the DSWEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed “*Summary of EPA Rating Definitions*”). We have concerns about the potential impact of the proposed Project to waters of the United States and biological resources. The EPA recommends the Final SWEIS also include additional analysis on water resources, mitigation measures, invasive species, climate change, air quality, and photovoltaic solar technologies. Our enclosed detailed comments provide additional information regarding these concerns and recommendations.

The DSWEIS identifies a number of individual projects that may have the potential to result in significant environmental impacts and will be subject to further NEPA review. We would appreciate the opportunity to participate in the environmental review at the individual project level. Please notify our office upon release of any future NEPA documentation and analyses for the Nevada National Security Site and off site locations in Nevada, and send a copy to our office.

We appreciate the opportunity to review this DSWEIS and are available to discuss our comments. Please send one hard copy and one CD ROM copy of the FSWEIS to this office 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 Scott Sysum at (415) 972-3742 or sysum.scott@epa.gov.

Sincerely,

/s/

Kathleen Martyn Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures:

- (1) Summary of EPA Rating Definitions
- (2) EPA's Detailed Comments
- (3) Distribution List

cc: Distribution List

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement.

ENVIRONMENTAL IMPACT OF THE ACTION

“LO” (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

“EC” (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

“EO” (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

“EU” (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. The EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality.

ADEQUACY OF THE IMPACT STATEMENT

Category “1” (Adequate)

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category “2” (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category “3” (Inadequate)

The EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

US EPA DETAILED COMMENTS ON THE DRAFT SITE-WIDE ENVIRONMENTAL IMPACT STATEMENT FOR THE CONTINUED OPERATION OF THE DEPARTMENT OF ENERGY/NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA NATIONAL SECURITY SITE AND OFF SITE LOCATIONS IN NEVADA, DECEMBER 2, 2011

Water Resources

Impacts to Surface Water Resources / Clean Water Act Section 404

The DSWEIS does not fully assess potential impacts to wetlands and surface water resources. It indicates that there are no perennial streams on the site, and small springs provide perennial surface water sources throughout the area (p. 4-63). Jurisdictional delineations, pursuant to Section 404 of the Clean Water Act, have not yet been conducted for the project sites.

The DSWEIS indicates that, based on the new delineation guidance¹, no wetlands at the site are expected to be jurisdictional, although certain tributaries on the NNSS may qualify (e.g., Fortymile Wash) (p. 4-66). Later in the DSWEIS, it is stated that most of the springs at the NNSS support wetland (hydrophytic) vegetation, such as cattail, sedges, and rushes, which likely constitute wetlands, as defined by the U.S. Army Corps of Engineers and EPA (33 Code of Federal Regulations [CFR] 328.3(b) and 40 CFR 230.3(t), respectively) (p. 4-100). The DOE defers this assessment to future site-specific analysis, indicating that if a specific project may affect potentially jurisdictional waters, then a jurisdictional delineation would be verified by the U.S. Army Corps of Engineers (p. 4-66) at that time.

Aquatic resources provide a wide range of functions that are critical to the desert ecosystems. It is vital that project planning, especially at the larger site-wide scale, consider the locations and values of these resources so they can be avoided and preserved. Even small losses can be cumulatively significant, since 52% of Nevada's wetlands have already been lost².

Preservation of waters that are determined not to be jurisdictional is also important. Natural washes perform a diversity of hydrologic, biochemical, and geochemical functions that directly affect the integrity and functional condition of higher-order waters downstream. Healthy ephemeral waters with characteristic plant communities control rates of sediment deposition and dissipate the energy associated with flood flows, as well as provide habitat for breeding, shelter, foraging, and movement of wildlife.

Recommendations:

In the Final Site-Wide Environmental Impact Statement (FSWEIS), describe all potential waters of the U.S. that could be affected by the Project alternatives. Include maps that identify locations of these waters, and indicate their acreages and channel lengths, habitat types, values, and

¹ EPA and Army (U.S. Environmental Protection Agency and U.S. Department of the Army), 2007, Clean Water Act Jurisdiction, Following the U.S. Supreme Court's Decision in *Rapanos v. United States & Carabell v. United States* Memorandum, June 5.

² Estimated loss from the 1780's to the 1980's. See: Thomas E. 1990. Wetlands losses in the United States 1780's to 1980's. U.S. Department of the Interior, Fish and Wildlife Service, Washington, D.C. Jamestown, ND: Northern Prairie Wildlife Research Center Online. <http://www.npwrc.usgs.gov/resource/wetlands/wetloss/index.htm>

functions. Discuss what steps DOE has taken to avoid and minimize impacts to potential waters of the U.S.

The FSWEIS should also discuss the aquatic features that are determined not to be jurisdictional waters. Characterize the functions of such features and discuss potential project impacts. The potential damage that could result from disturbance of flat-bottomed washes includes alterations to the hydrological functions that natural channels provide in arid ecosystems, such as adequate capacity for flood control, energy dissipation, and sediment movement; as well as impacts to valuable habitat for desert species.

EPA recommends the following to avoid and minimize direct and indirect impacts to desert washes:

- Do not place support structures in washes or desert dry wash woodlands.
- Utilize existing natural drainage channels on site and more natural features, such as earthen berms or channels, rather than concrete-lined channels.
- Commit to the use of natural washes, in their present location and natural form and including adequate natural buffers, for flood control to the maximum extent practicable.
- Reconfigure the Project layout, roads, and drainage channels, as applicable, to avoid ephemeral washes, including desert dry wash woodlands within the Project footprint.
- Minimize the number of road crossings over washes and design necessary crossings to provide adequate flow-through during storm events.

If fencing is to be used for specific projects on-site, the FSWEIS should provide detailed information on any proposed fencing design and placement, and its potential effects on drainage systems on the Project site. In general, fencing should be designed to avoid drainages and not impede flows and sediment transport, if practicable.

Water Supplies

Public drinking water supplies and/or their source areas exist in many watersheds. Source water is water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Source water areas are delineated and mapped by the State for each federally-regulated public water system. The 1996 amendments to the Safe Drinking Water Act require federal agencies to protect sources of drinking water for communities. The DSWEIS states that no adverse impacts on potable groundwater quality have resulted from operations since 1996 and that, due to the distance between existing water supply wells at the NNSS and the underground tests, DOE/NNSA believes that groundwater use at the NNSS has little or no effect on the migration or spread of contamination from underground nuclear testing. The DSWEIS also indicates that groundwater at the NNSS is deep and slow moving, and that this affords protection to adjacent areas. Maintenance of the quality of waters that are currently clean is managed through the implementation of the Groundwater Protection Management Plan, required by DOE Order 5400.1 (p. 4-93).

Recommendation:

The FSWEIS should identify:

- Any source water protection areas within the Project area.
- All activities that could potentially affect source water areas.
- Potential contaminants, other than radionuclides, that may result from the proposed Project that could impact source water protection areas.
- Measures that would be taken to protect the source water protection areas.

Solar Technologies Evaluated in the Alternatives Analysis

The DSWEIS states that the solar technologies that are most likely to be deployed at utility scale over the next 20 years are photovoltaic and concentrating solar power, such as parabolic trough, power tower, and dish engine. It is unknown what technology would be used in a solar power generation facility at the NNSS, but the analysis in this NNSS SWEIS assumes a concentrating solar power parabolic trough facility, based on the prevalence of that technology in other operating, proposed, and potential solar energy projects in southern Nevada (p. 3-28). In EPA's observation, photovoltaic systems are currently drawing more interest for future utility scale solar power projects. A few major CSP projects in the CA and NV deserts are changing or planning to change from CSP to PV technology. One reason is the increasing drop in the prices of solar PV modules and the ever-expanding track record for large-scale PV installations. Another advantage of PV systems is the potential for reduced environmental impact. Grading requirements can be less, water use is less and panel placement can be flexible to avoid sensitive areas, important considerations in the desert environment.

Recommendation:

The alternatives analysis in the FSWEIS should include a discussion of using PV as the technology for the utility-scale solar power facility. This could also include the use of hybrid PV/CSP plants.

Tiering and "Programmatic Like" Analysis

Since the DSWEIS is a large scale planning effort, details regarding specific projects are not always included, and the document indicates that additional NEPA analysis would occur for these projects (p. 1-12). However, it is not clear which individual projects are expected to receive further NEPA review. For example, Table 3-1, which compares the projects for each alternative, states that NNSA will develop and construct new facilities to support counterterrorism training and research and development activities, and this listing does not include a notation indicating that additional NEPA analysis would be required. Yet the text of the DSWEIS states that an appropriate level of additional NEPA analysis (beyond this SWEIS) would be required before NNSA makes any decision regarding these facilities (p. 3-35). The same is true for the Reconfigure Mercury project (Table 3-1 and p. 3-40).

The DSWEIS also does not describe the process that would be used to determine the level of subsequent NEPA analysis, nor does it identify the mechanism, screening criteria, or thresholds that would be used to make these determinations.

In the expanded operations alternative, two of the larger land disturbing site specific projects - the Office of Secure Transportation training facility and the commercial-scale solar power facility - would together involve construction on more than 20,000 acres of previously undisturbed land. Because of the large land disturbance of these projects, it appears that they have the potential to significantly affect the environment.

Recommendations:

The DOE/NNSA should elaborate on the process that individual offices will use to determine whether an Environmental Assessment or EIS will be prepared for subsequent projects, and identify the mechanism, screening criteria, and/or thresholds that would be used to make these decisions. We recommend that consistent standards for determining the appropriate level of NEPA review for individual projects be identified and implemented to ensure that all impacts are identified and disclosed to decision-makers.

The FSWEIS should use consistent nomenclature for the individual projects and clearly and consistently identify what projects are expected to require further NEPA analysis.

Proposed Mitigation Measures

Chapter 7 of the DSWEIS lists the mitigation measures that are proposed to mitigate project impacts. Many of these proposed mitigation measures are generic, however, and do not identify specific actions that would be taken, nor the locations where they would occur. To be considered adequate, mitigation measures should be specific, feasible actions that will improve adverse environmental conditions. Mitigation measures should be measurable by all interested parties that may be monitoring their implementation. The CEQ has provided guidance on documenting and implementing mitigation measures, which states, among other things, that agencies should provide clear documentation of mitigation commitments, and when and how the mitigation commitments will be implemented. Also, the mitigation measures should be carefully specified in terms of measurable performance standards or expected results.³

Recommendation:

In the FSWEIS, the ROD or the required Mitigation Action Plan, the mitigation measures should have clear objectives – specifically how each measure will be implemented, who is responsible for its implementation, where it will occur and when it will occur.

Biological Resources, Habitat and Wildlife

Many of the proposed activities would result in vegetation being cleared and soils moved during the construction of roads, training ranges, buildings and other facilities. Such activities could adversely affect raptors or their habitats, which are known to occur on the project site (p. 5-263).

³ CEQ, Final Guidance for Federal Departments and Agencies on the Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact (“Mitigation Guidance”), Jan. 14, 2011.

All raptor and owl species are protected under the Migratory Bird Treaty Act. The golden eagle and bald eagle also receive protection under the Bald and Golden Eagle Protection Act. In September 2009, the U.S. Fish and Wildlife Service finalized permit regulations⁴ under the BGEPA for the take of bald and golden eagles on a limited basis, provided that the take is compatible with preservation of the eagle and cannot be practicably avoided. The final rule states that if advanced conservation practices can be developed to significantly reduce take, the operator of a facility may qualify for a programmatic take permit. Most permits under the new regulations would authorize *disturbance*, rather than take. Projects or activities that could impact golden or bald eagles may require the preparation of an Eagle Conservation Plan.

Recommendation:

Initiate discussions with the U.S. Fish and Wildlife Service on the requirement that an Eagle Conservation Plan be developed for transmission line projects or other projects that could impact bald or golden eagles. If required, the conservation plan should be based upon the U.S. Fish and Wildlife Service 2011 Draft Eagle Conservation Plan Guidance.

Invasive Species and Pesticide Management

Executive Order 13112, *Invasive Species* (February 3, 1999), mandates that federal agencies take actions to prevent the introduction of invasive species, provide for their control, and minimize the economic, ecological, and human health impacts that invasive species cause. The DSWEIS acknowledges potential invasion by noxious weeds as a significant impact and proposes mitigation measures; however, the mitigation is vague and it is unclear how it would be implemented and enforced (p. 5-115). Since the proposed Project will entail extensive surface disturbance and potentially new landscaping, the FSWEIS should describe how the Project will meet the requirements of Executive Order 13112.

Recommendation:

The FSWEIS should include an invasive plant or noxious weed management plan to monitor and control noxious weeds.

Climate Change

Emissions of carbon dioxide and other heat-trapping gases are affecting weather patterns, sea level, ocean acidification, chemical reaction rates, and precipitation rates, resulting in climate change. One report predicts that, by 2100, the average temperatures for Nevada are expected to increase by 3-4° F in the spring and fall and by 5-6° F in the summer and winter⁵. In general, Nevada is expected to have wetter winters and more arid summers as the subtropical dry zones for the whole planet are projected to increase. Higher temperatures and increased winter rainfall will be accompanied by a reduction in snow

⁴ See Eagle Permits, 50 CFR parts 13 and 22, issued Sept. 11, 2009. See internet address:

<http://www.fws.gov/migratorybirds/CurrentBirdIssues/BaldEagle/Final%20Disturbance%20Rule%2009%20Sept%202009.pdf>

⁵ United States Environmental Protection Agency. 1998. Climate Change and Nevada. Climate and Policy Assessment Division (2174), USEPA.

pack, earlier snowmelts, and increased runoff.⁶ The DEIS includes a good discussion of the effects of climate change in the Great Basin (p. 4-128). Some of the predictions, such as reduced groundwater discharge, and more frequent and severe drought conditions, may impact proposed or planned projects.

Recommendation:

The FSWEIS should discuss the potential impact of climate change on the project and mitigation measures, and assess how the projected impacts of the Project could be exacerbated by climate change.

Air Quality

National Ambient Air Quality Standards (NAAQS) and Particulate Matter

The DSWEIS describes and estimates air emissions from the proposed facility, including potential construction and maintenance activities, as well as proposed mitigation measures to minimize those emissions. Though we understand that the area where the Project will be implemented is in attainment for NAAQS, it is important to minimize impacts, whenever possible, for the protection of human health and the environment. Implementation of additional mitigation measures could reduce the Project's emissions.

Recommendations:

EPA recommends the following measures to reduce emissions of criteria air pollutants and hazardous air pollutants (air toxics).

- *Construction Emissions Mitigation Plan* – The DSWEIS should include a Construction Emissions Mitigation Plan. In addition to all applicable local, state, or federal requirements, the EPA recommends that the following mitigation measures be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of particulate matter and other toxics from construction-related activities:
 - *Fugitive Dust Source Controls:* The DSWEIS should identify the need for a Fugitive Dust Control Plan. We recommend that the plan include these general commitments:
 - Stabilize heavily used unpaved construction roads with a non-toxic soil stabilizer or soil weighting agent that will not result in loss of vegetation, or increase other environmental impacts.
 - During grading, use water, as necessary, on disturbed areas in construction sites to control visible plumes.
 - Vehicle Speed
 - Limit speeds to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions.
 - Limit speeds to 10 miles per hour or less on unpaved areas within construction sites on unstabilized (and unpaved) roads.

⁶ The Center for Integrative Environmental Research (CIER) at the University of Maryland. 2008. Economic Impacts of Climate Change on Nevada.

- Post visible speed limit signs at construction site entrances.
- Inspect and wash construction equipment vehicle tires, as necessary, so they are free of dirt before entering paved roadways, if applicable.
- Provide gravel ramps of at least 20 feet in length at tire washing/cleaning stations, and ensure construction vehicles exit construction sites through treated entrance roadways, unless an alternative route has been approved by appropriate lead agencies, if applicable.
- Use sandbags or equivalent effective measures to prevent run-off to roadways in construction areas adjacent to paved roadways. Ensure consistency with the project's Storm Water Pollution Prevention Plan, if such a plan is required for the project
- Sweep the first 500 feet of paved roads exiting construction sites, other unpaved roads en route from the construction site, or construction staging areas whenever dirt or runoff from construction activity is visible on paved roads, or at least twice daily (less during periods of precipitation).
- Stabilize disturbed soils (after active construction activities are completed) with a non-toxic soil stabilizer, soil weighting agent, or other approved soil stabilizing method.
- Cover or treat soil storage piles with appropriate dust suppressant compounds and disturbed areas that remain inactive for longer than 10 days. Provide vehicles (used to transport solid bulk material on public roadways and that have potential to cause visible emissions) with covers. Alternatively, sufficiently wet and load materials onto the trucks in a manner to provide at least one foot of freeboard.
- Use wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) where soils are disturbed in construction, access and maintenance routes, and materials stock pile areas. Keep related windbreaks in place until the soil is stabilized or permanently covered with vegetation.
- *Administrative controls:*
 - Develop a construction traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips.
 - Identify any sensitive receptors in the project area, such as children, elderly, and the infirm, and specify the means by which impacts to these populations will be minimized (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).
 - Include provisions for monitoring fugitive dust in the fugitive dust control plan and initiate increased mitigation measures to abate any visible dust plumes.

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