



**CONSERVATION
LANDS
FOUNDATION**

February 3, 2020

Jamie Lynn Rodriguez
Washoe County
1001 E. Ninth Street
Reno, NV 89512

RE: Draft Truckee Meadows Public Lands Management Act

Dear Ms. Rodriguez

We appreciate the opportunity to work with the County, Nevada's Members of Congress and other stakeholders to craft balanced public lands legislation. The Conservation Lands Foundation has engaged with Washoe County leaders throughout the development of the Truckee Meadows Public Lands Management Act in its various iterations, and we continue to urge the County to consider the tremendous conservation and recreation opportunities laid out below as you work to formulate your final recommendations to the Nevada Delegation. We also urge you to be mindful of the potential problems for example mass Wilderness Study Area releases may cause as we move forward in this process in Washoe County and particularly as this proposal makes its way through Congress.

Over the past several years, the Conservation Lands Foundation has worked to advance the management of the National Conservation Lands, and expand the system to include lands worthy of long term conservation protections. We believe there are regions within purview of the proposal that are worthy of Wilderness, National Conservation Area, and other permanent designations that are essential for habitat connectivity, cultural and historic preservation, and the growing outdoor recreation industry.

We support Wilderness proposals that secure the protection of the following Wilderness Study Areas (WSAs) and Lands with Wilderness Characteristics (LWCs):

Macy

- The larger Wilderness proposal (approximately 20,000 acres) should stand as the area is an important habitat link for Greater Sage-Grouse as well as bighorn sheep and many other species, and provides important connectivity to the Sheldon-Hart Mountain National Wildlife Refuge.

- The Macy Wilderness proposal boasts scenic basalt rims, hidden dry lake basins, plateaus dotted with isolated stands of juniper trees, and a volcanic headland towering more than 800 feet above the surrounding valley floors. This area offers sanctuary and high quality habitat for wildlife, as well as outstanding solitude for human visitors.
- We support limited release of the Wilderness Study Area to accommodate private parcel access and in consideration of larger conservation protections.

Massacre Rim

- We recommend the adoption of the larger revised boundary which includes the approximately 44,000 acres of the Massacre Archaeological ACEC and accounts for acreage needed for Massacre Rim to remain an International Dark Sky Sanctuary.
- For decades the Massacre Rim is recognized as having a higher density and highest quality of habitat of Greater Sage-Grouse than surrounding areas, as most of the Wilderness Study Area is within a designated Sagebrush Focal Areas. In addition, the surrounding landscape in this proposal forms a vast, amphitheater-like plateau sloping gently toward Massacre Lake in its center, and is rich in cultural resources. Drainages vary from perched, isolated dry lake beds to twisting canyons cutting vertical walls through basalt rimrock. Water is abundant in the wilderness with over 20 identified springs.

Granite Banjo

- More than a decade ago, with \$6 million of Southern Nevada Public Lands Management Act (SNPLMA) funding, more than 17,000 acres of land were acquired in order to permanently protect wildlife, cultural resources and access to the public. The acquisition included the Poodle Mountain and Buffalo Hills. The designation of Granite Banjo as Wilderness is the next step in achieving the permanent protection for its treasures that we as a community have invested in.
- The landmark Granite Range mountain massif is extremely scenic, leaping skyward some five thousand feet from the valley floor to the highest rampart. Along the range's crest are invaluable expanses of critical wildlife habitat for trophy mule deer and world class bighorn sheep. The area is beloved by recreationists who have for many years advocated for its protection.

We support National Conservation Area proposals that secure the protection of the following WSAs and LWCs:

Buffalo Hills Complex - This region, including the Poodle Mountain, Buffalo Hills, Twin Peaks, and Dry Valley Rim WSAs.

- We support a National Conservation Area with a Wilderness core. The Buffalo Hills Complex would allow for the protection of a larger intact landscape which provides better connectivity for the diverse wildlife in the region. The Wilderness designation

provides for additional protections for the important ecological, historic and cultural areas.

- The Buffalo Hills complex includes the Smoke Creek Archaeological District and the Nobel Route of the California Historic Trail.
- It is one of the biggest and wildest landscapes in Nevada. From the spectacular Hole-In-The-Ground caldera pattern and looming red cliff faces to the wildflower-covered plateaus of Poodle Mountain and the wall of Dry Valley Rim, the Buffalo Hills Wilderness Complex provides some of the richest, most diverse wildlife habitat in the state. California Bighorn Sheep, Pronghorn, Mule Deer, Chukar, Sage-Grouse, and other wildlife abound. These lands offer significant recreational resources for hunting, fishing, hiking, and other activities.
- As mentioned in our comments about the Granite Banjo area, \$6 million of SNPLMA funds were used to acquire more than 17,000 acres in Poodle Mountain, Buffalo Hills and Granite Banjo in order to permanently protect natural and cultural resources.

Wall Canyon

- We support a National Conservation Area designation for this area as it is better suited to provide the protection necessary for the ecological, historic and cultural values while not impacting the various road networks in existence in spite of its WSA status.
- The larger NCA boundary (compared to the Wall Canyon WSA boundary) provides better connectivity for the diverse wildlife found in the area while incorporating the numerous parcel acquisitions and archeological features in the area.
- This proposal is nearly all within the Sagebrush Priority Habitat Management Area and includes the most important lek habitat in the state. The Wall Canyon area has high wilderness values including Wall Creek which contains native fish like the Wall Canyon Sucker, speckled dace and redbreast shiners.
- During the stakeholder meeting hosted by the County on January 24, 2020 several questions were raised about grazing language in National Conservation Areas. We offer these examples of language in current and proposed National Conservation Land units.
 - Red Cliffs National Conservation Area¹
 - (4) *GRAZING.*—*The grazing of livestock in the National Conservation Area, where established before the date of enactment of this Act, shall be permitted to continue—*

(A) subject to—

(i) such reasonable regulations, policies, and practices as the Secretary considers necessary; and

(ii) applicable law (including regulations); and

¹ https://www.blm.gov/sites/blm.gov/files/nationalconservationlandsdesignation_utah.pdf

(B) in a manner consistent with the purpose described in subsection (a).

- Senate Bill 2828 - Malheur Community Empowerment for the Owyhee Act²
 - There are several references to “grazing” and “livestock grazing” in Senator Ron Wyden’s bill including in the following two sections.
 - *Sec. 3. PURPOSE AND OBJECTIVES. (b) OBJECTIVES. — (1) IN GENERAL.*

(C) to maintain grazing on the Federal land—

(i) for the economic well-being of the County; and

(ii) as a tool to improve the ecological health of the Federal land;

- *Sec. 5. LAND DESIGNATIONS. (b) DESIGNATION OF WILDERNESS AREAS.—*

(B) GRAZING.—The Secretary shall allow the continuation of the grazing of livestock in the wilderness areas, if established before the date of enactment of this Act, in accordance with—

(i) this Act;

(ii) section 4(d)(4) of the Wilderness Act (16 U.S.C. 1133(d)(4));

(iii) the guidelines set forth in Appendix A of the report of the Committee on Interior and Insular Affairs of the House of Representatives accompanying H.R. 2570 of the 101st Congress (H. 18 Rept. 101–405); and

(iv) any other Federal law that applies to livestock grazing on Federal public land.

We support permanent protections that secure the following Wilderness Study Areas (WSAs), Lands with Wilderness Characteristics (LWCs) and other ecologically important areas:

Bitner Triangle

- This area is of great importance for the Greater Sage-Grouse and special considerations should be taken for permanently protecting this area as part of future planning needs for

² <https://www.congress.gov/116/bills/s2828/BILLS-116s2828is.pdf>

the species. Protection and restoration of important lek, nesting and brood-rearing habitat could help prevent a future listing of the bird under the Endangered Species Act.

- An “Outstanding Natural Area” or at minimum a “Special Management Area” designation should be considered.

Fox Range and Pole Creek

- The close proximity to the Reno/Sparks urban areas encourages Truckee Meadows residents to partake in public lands adventures like day hikes and family hunts. The Fox Range’s stunning vistas ensure hikers are treated to the sights of three deserts: the Smoke Creek Desert to the west, the San Emidio Desert to the east and the expansive Black Rock Desert to the north.
- The area is worthy of permanent protection including Wilderness, and we would defer to the Pyramid Lake Paiute Tribe on what the best designation for the Fox Range should be.

Due to the above factors we strongly urge Washoe County and the Nevada Delegation to consider proposing Wilderness, National Conservation Areas and other permanent designations as a part of this lands bill process.

Public lands are becoming increasingly essential to ensure adequate habitat connectivity, mitigate the impacts of climate change and provide open space for residents to recreate. The protection of these regions is beneficial to Washoe County, its quality of life and future. Research shows that communities with protected federal public lands generally outperform those without public lands in faster rates of job growth and higher levels of per capita income. According to Headwaters Economics, “Western non-metropolitan counties with more than 30 percent of the county’s land base in federal protected status such as national parks, monuments, wilderness, and other similar designations increased jobs by 345 percent over the last 40 years. By comparison, similar counties with no protected federal public lands increased employment by 83 percent.”³

We look forward to seeing and participating in upcoming public meetings regarding the County’s proposal.

Sincerely,
Jocelyn Torres
Senior Field Director
Conservation Lands Foundation

CC: Senator Catherine Cortez Masto
Senator Jacky Rosen
Congressman Mark Amodei

³ https://headwaterseconomics.org/wp-content/uploads/West_Is_Best_Full_Report.pdf

