

February 3, 2020

TO: Senator Jacky Rosen
Senator Catherine Cortez Masto
Congressman Mark Amodei
Assistant County Manager Kate Thomas and Jamie Rodriguez

FROM Friends of Nevada Wilderness

RE: Friends of Nevada Wilderness feedback on preliminary Truckee Meadows Public Lands Management Act Conservation Proposals

This memo is to provide feedback to Washoe County, the cities of Reno and Sparks, and our members of Congress from Friends of Nevada Wilderness on the conservation proposal maps presented at the stakeholder group meeting on January 24, 2020 as part of the process on the Truckee Meadows Public Lands Management Act. We are appreciative of all the meetings and efforts the county and cities as well as other stakeholders have invested over the years in this process. Friends of Nevada Wilderness has been working in good faith with other stakeholders on finding common sense boundaries for conservation protections in northern Washoe County on our public lands for decades. For this last round of public lands bills efforts, we have been diligently working since 2014.

Our proposals and positions have shifted and evolved as we continued to work to resolve issues and find common ground where possible. Our efforts have generally focused on resolving wilderness study areas on our public lands managed by both the Bureau of Land Management and the US Fish and Wildlife Service for the Sheldon National Wildlife Refuge. We do recognize that there are other lands in Washoe County that have conservation values beyond these wilderness study areas. The Wilderness Society has presented a report with the scientific analysis of the conservation values of BLM-managed lands in northern Washoe County.

Residents and visitors alike to Washoe County are blessed with the diversity and extent of beautiful public lands owned by all Americans. These public lands provide habitat for our wildlife and provide an amazing spectrum of recreation from skiing on Mt. Rose, off highway exploration along a vast network of dirt roads throughout the county, hiking, camping, hunting, biking to star grazing at the Massacre Rim Dark Sky Sanctuary. Our public lands are also working landscapes that provide economic benefit to the recreation, livestock and mining industries.

General Comments

Over the past three years, Friends of Nevada Wilderness provided Washoe County staff with extensive maps, reports and other information about Wilderness. On October 25, 2019 we consolidated much of that information into one document that contains information about Wilderness values, issues with old BLM recommendations and rationale for our Wilderness proposals and provided the link to this document to county staff and to the Nevada delegation.

We look forward to continuing this process that started many years ago. Nevada and Washoe County have greatly changed since BLM and US Fish and Wildlife Service wilderness study areas were created in the 1970's. Some of the changes affecting our public lands in Washoe County involve the decline of our precious sagebrush ecosystem and the species that depend it including but by no means limited to the Greater Sage-grouse. Certainly, Wilderness and National Conservation Area protections are would be forward-looking designations that would provide regulatory certainty in the future should a listing occur. The population of Washoe County has exploded since the 1970's and the drivers of the local economy have shifted considerably to the recreation and technology industries. Residents care a great deal about quality of life and our public lands are the basis for nearly all that makes living in Washoe County so wonderful. As we think about how to protect these amazing public lands landscapes we need to look to the future, not the past.

Area Specific Comments

Sheldon National Wildlife Refuge WSA

The Sheldon National Wildlife Refuge is managed by the US Fish and Wildlife Service (USFWS) and is part of the greater Sheldon-Hart Mountain National Wildlife Refuge Complex. The Sheldon Refuge, set aside in 1931 to help the imperiled American pronghorn provides some of the best intact wildlife habitat in the western US. Much of the refuge was formally proposed as Wilderness by the agency in the 1970's and those proposals sent to Congress. It is USFWS policy to manage these areas as Wilderness until Congress acts. In 2012 as part of the Sheldon Comprehensive Management Plan (CCP) the USFWS through a public process made some adjustments to their 1970's wilderness proposals that Friends of Nevada Wilderness can support. The Truckee Meadows Public Lands Management Act provides the opportunity to resolve these proposals and will allow lands that need more active management to be released from wilderness management.

It would be prudent, if possible, for the delegation when drafting legislation to include wilderness resolutions for the entire refuge (located in both Washoe and Humboldt Counties) and provide complete resolution for the USFWS wilderness proposals. This will allow the Refuge more flexible management options. If only the areas in Washoe are included in legislation, we ask that complete units are designated and not split by a Washoe County line.

It is also important for the delegation to enact a permanent mineral withdrawal for the entire refuge with the exception of the Virgin Valley Mining District. Currently, the mineral withdrawal is administrative and only for 20 years. This should be made permanent so that if in some time in the future, the administrative withdrawal is forgotten or overlooked, the refuge is not suddenly open to mining.

Sheldon Contiguous WSA

Since the Sheldon Contiguous WSA is directly contiguous to the Wilderness proposals in the Sheldon Refuge (Rye Creek proposed Wilderness), it makes sense to designate them together. The boundary currently being considered by the county/cities matches boundaries to the east and south with the Sheldon Wilderness proposal. This boundary makes more sense than previous recommendations.

We have the following suggestions/concerns:

- Because of the high value of Greater Sage-grouse habitat in this WSA and the fact it is contiguous with the Sheldon Refuge and provides an unparalleled block of significant quality habitat we believe the Wilderness proposal should be extended to the west.
- Any loss of WSA protection will allow uses not compatible with Great Sage-grouse protection including opening the area to mining, leasing, rights-of-way, etc. While development may be unlikely remember the Ruby Pipeline.
- We propose a field trip to this area with key stakeholders when the weather improves to work out a boundary to better protect wildlife habitat.

Massacre Rim WSA and Bittner Triangle

We support the expanded boundary currently as requested by the Tribes being considered by county/cities for the Massacre Rim Wilderness to better protect the significant cultural resources found here. The BLM's current administrative archaeological ACEC provided little protection except for not allowing firewood cutting.

On March 18, 2019, Massacre Rim became just the 7th designated Dark Sky Sanctuary in the world. Massacre Rim is so remote that it has "exceptional quality of starry nights" and a nocturnal environment that is protected for its natural values, criteria necessary to meet the International Dark-Sky Association's strict standards for a Dark Sky Sanctuary. The sanctuary designation of course is contingent upon its protected landscape status. We will need to ensure that the final Wilderness designation (or combination with other designations) will retain the Dark Sky Sanctuary status.

We have the following suggestions/concerns:

- We propose a field trip to this area (in conjunction with one to Sheldon Contiguous) to address potential wildlife management concerns with juniper along the Massacre Rim. We would like to see the entire Massacre Rim in the Wilderness proposal.
- We propose a congressional special management area (SMA) for the Bittner area (Badger Meadows) directly adjacent to the Massacre Rim WSA and directly adjacent to the Fish Creek Table proposed Wilderness on the Sheldon Refuge.
 - We are NOT proposing Wilderness for the Bittner area and do not want to impact the current grazing efforts going here in a manner helpful to NDOW/BLM for Greater Sage-grouse management.
 - Because of the significance of this area for Sage-grouse brooding we are proposing that the SMA be designated to withdraw the area for mining, leasing and other development. The purpose of the SMA would be for wildlife habitat protection.

Granite Banjo

This area was not made a WSA in the 1970's because of the large amount of private lands. However now that most of the private lands in are in public ownership through a SNPLMA acquisition the area

clearly qualifies for Wilderness. After the acquisition, the BLM did a wilderness review and found the unit qualified for Wilderness. This proposal was carried forward in the final Winnemucca RMP. The county/cities proposed map is a great start but we would like to see some adjustments.

We have the following suggestions/concerns:

- We do not believe that removing the steep slopes of the southern range from proposed Wilderness makes sense from a conservation perspective. The slopes particularly on the east are part of the viewshed from Gerlach and the Black Rock NCA.
- While the current northern boundary in the county/cities proposal makes some sense it also eliminates a large number of parcels acquired through the SNPLMA acquisition. The private land owner whose lands would be involved (Bright Holland) has been supportive of the boundary further to the north as we proposed.

Wall Canyon WSA

The Wall Canyon Wilderness Study Area in northern Washoe County contains some amazing resources. Archaeological surveys of the region reveal a highly complex pre-historic settlement pattern. Temporary camps and hunting-related lithic scatters were found on the benches and slopes above drainages, at rim-edge chipping stations, near canyon rock shelters and at sources of massive obsidian. A majority of this WSA and the surrounding Hay Canyon Range contains critical and irreplaceable habitat for the greater sage grouse. This region contains some of the largest and most productive sage-grouse leks in Nevada. Friends of Nevada Wilderness believes that conservation protection is necessary. Additionally, the Home Camp acquisition put extensive private holding into public ownership using SNPLMA funds in a process broadly supported by the wildlife and conservation communities.

We have the following suggestions/concerns:

Over the years since the area was made a WSA, roads have been expanded and created. As a result, there are now more management concerns than before. For this reason and others, we believe a compromise would be a larger yet less restrictive designation to protect the many conservation values.

- We propose a National Conservation Area that would take in much of the area deserving of protection while providing more flexible management for wildlife and habitat restoration.
- NCA language would need to be clear on livestock grazing, and habitat restoration. We could provide language examples from other national designations and we would assume the delegation would find the language that fit the stakeholder needs in the Wall Canyon/Hays Range.

Buffalo Hills/Poodle Mountain/Twin Peaks/Dry Valley Rim WSAs/Burro Mountain

We believe that there is fairly broad overall agreement on this complex. While work still needs to be done on some adjustments to the Poodle Mountain Wilderness proposal most of the Wilderness proposals are ones that were worked out several years ago with affected stakeholders.

We have the following suggestions/concerns:

- The county/cities proposed maps have several units of NCAs that are separated. From a management standpoint it would make more sense to have one overarching national conservation area that ties landscape protections together for this important area.
- The Smoke Creek National Conservation Area would provide conservation protection but would allow more management flexibility for livestock management, wildlife management and habitat restoration, trapping, and travel management.
- NCA language would need to be clear on livestock grazing, and habitat restoration. We could provide language examples from other national designations and we would assume the delegation would find the language that fit the stakeholder needs in the Smoke Creek region.

Fox Range

The Fox Range WSA encompasses the Fox Mountain Range immediately north of the Pyramid Lake Indian Reservation. The Smoke Creek Desert lies to the west and the San Emidio Desert to the east. The views from the top of this range are unbelievable. We understand there is geothermal potential along both the eastern and western lower flanks of the range.

We have the following suggestions/concerns:

We would prefer to see some form of conservation on this range but we will defer to the Pyramid Lake Tribes on how they would like to see this range managed since it is adjacent to the Reservation.

Summary

Friends of Nevada Wilderness is encouraged by the process and discussion to date and are thankful for the effort of Washoe County and cities of Sparks and Reno's staff. We are also grateful for the full participation of our Nevada delegation staff. We believe with continued work, most, if not all, outstanding issues can be resolved by bringing key stakeholders together for detailed discussion over detailed maps and field trips as needed. Issues that still remain unresolved after a reasonable amount of discussion will need to be addressed by our Congressional delegation in the final legislation. We look forward to working with all parties to come to final resolution.