

Coalition for Nevada's Wildlife

P. O. Box 70143
Reno, Nevada 89570

Dec. 11, 2019

Ms. Jamie Rodriguez
Washoe County Manager's Office
1001 E. Ninth St.
Reno, NV 89512
jarodriguez@washoecounty.us

Re: Washoe County Public Lands Management Act

Dear Ms. Rodriguez:

The Coalition for Nevada's Wildlife hereby submits the following comments regarding boundary and preliminary mapping efforts associated with this Act. Unfortunately the agencies coordinating this effort have not shared their latest bill language for our review and comment. Since the actual bill language greatly impacts our decisions regarding withdrawal and wilderness management, the following comments should be considered preliminary and subject to revision.

Our main priorities in this Act consist of (1) allowing needed and expedient wildlife management including habitat improvements for the protection and enhancement of wildlife resources and (2) maintaining access for sportsmen and the general public for outdoor recreation. Our comments are as follows:

Wilderness Boundaries

The 2014 Massacre Rim boundary has been expanded significantly from that negotiated in our stakeholder meetings of 2018. The reasoning behind this expansion was reportedly due to the habitat improvement projects proposed by the Nevada Department of Wildlife (NDOW) being completed prior to the passage of this bill. This assumption is simply not true, and in fact BLM permitting will not even begin, let alone be completed, in the foreseeable future due to the abundance of archeological finds that require both labor and funding that BLM does not want to commit. Inclusion of these areas as wilderness will place another layer of bureaucratic regulations that will render any habitat improvement projects practically impossible. We insist the boundary be placed in conformance with that negotiated in 2018 stakeholders meetings.

The northern boundary of the Granite/Banjo Mountain wilderness has been expanded to the north from the 2018 boundary. We can live with this change.

**NEVADA SPORTSMEN AND CONSERVATIONISTS WORKING FOR
THE ENHANCEMENT OF WILDLIFE AND HABITAT**

Public Access

Existing roads should be added to the updated maps. In particular, existing roads need to be added to the Massacre Rim and Granite/Banjo maps.

Land Disposal Urban Areas

Portions of the Peterson Mountains and the Sand Hills, which are critical mule deer winter range, are still within the boundaries of proposed withdrawal. We have been informed that these areas of critical wildlife habitat cannot be disposed of or transferred in the future. If this is the case, why even include these areas?

Similarly, large areas within the Pah Rah Mountains that are within the boundary are very steep which we are assured precludes disposal for development. Again, why include these areas within the boundaries? We fully understand the needs of our community in the planning of a highway route from Spanish Springs Valley southeast to Interstate 80 and USA Parkway. Such a route would bisect mule deer and antelope habitat and migration corridors. Wildlife overpasses must be incorporated into any planning effort.

Transfer of lands that are important wildlife habitat from BLM ownership eliminates critical federal funding for such activities as wildfire restoration. If these areas are not to be disposed of or developed, the County should not be asking for withdrawal.

Bill Wording

We highly recommend that specific wording be included in the bill to adequately direct future management efforts on all wilderness, National Conservation Areas, and other land designations within this Act. Specific bill language recommendations are well summarized in the NDOW correspondence dated 2-13-2018. There is precedent for including specific direction in bill wording (ie. Malheur Community Empowerment for the Owyhee bill) which would go a long way to re-assure sportsmen and the general public that future management practices will be in accordance with the original intent.

Without specific direction, wildlife management including habitat improvement suffers from BLM local interpretation of Wilderness and NCA regulations. For example, your latest handout contains a table showing "Difference between the Designations in the Truckee Meadows Public Lands Management Act." This table lists the allowed activities in wilderness, including wildfire suppression, wildlife management, and Wildlife Water Development Projects. To the uninformed it would appear there should be no impacts to wildlife, but in real life this is far from true. Mahogany Mountain, critical mule deer habitat was allowed to burn because the BLM Fire boss declared the area was within the Wilderness boundary. Several wildlife guzzlers previously approved by BLM north of High Rock Canyon were then denied upon Wilderness designation. We were successful in obtaining BLM permits for wildlife water developments in the wilderness of the Goshute Mountains, but only after five (5) years and costs associated with permitting in excess of \$50,000.00 – efforts that could have been used to directly benefit wildlife.

During a critical disease episode in southern Nevada, NDOW was denied permission to place GPS collars on bighorn sheep within wilderness boundaries. The examples go on and on. How does this remotely serve the public interest? Without specific wording in bill language, the public and their wildlife resources are not well served.

Closing

We feel a more public process is imperative to the success of this Act. We look forward to reviewing proposed bill language and participating in stakeholder meetings. Thank you for your consideration of our preliminary comments.

Sincerely,

The Coalition for Nevada's Wildlife

Larry J. Johnson – President (also Director of Nevada Outdoorsmen in Wheelchairs, and 30 yr. past director, Nevada Bighorns Unlimited)
Tom Smith – Vice President (also Director, Truckee River Flyfishers)
Joel Blakeslee – Director (also President, Nevada Trapper's Association)
Karen Boeger – Director (also Director, Back Country Hunters and Anglers)
Brunner, Bob - Director
Judi Caron – Director (also past President, Northern Nevada SCI)
Mike Cassidy – Director (also past President, Northern Nevada SCI)
Rex Flowers – Director (also former Washoe County Advisory Board)
John Hillenbrand – Director (also Director, Carson Valley Chukar Club)
Johnathan Lesperance – Director (also President, Nevada Sporting Dog Alliance)
Linda Linton, Esq. - Director
Willie Molini – Director (President, Nevada Waterfowl Association, and past Director of Nevada Department of Wildlife)
Jim Puryear -- Director (also Director, Nevada Bighorns Unlimited–Reno)
Bob Sack – Director (also Nevada Bow Hunters Association)
Sean Shea - Director (also member Nevada Outfitters and Guide Association)
Les Smith – Director (also State Chairman, Rocky Mountain Elk Foundation)