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February 25, 2020

Washoe County Commissioners  
Chairman Bob Lucey  
1001 E. Ninth St. Building A,  
Reno, NV 89512

**RE: Truckee Meadows Public Lands Management Act**

Dear Chairman Lucey,

The Modoc County Board of Supervisors (County) appreciates the opportunity to provide comments on the proposed Truckee Meadows Public Lands Management Act (Act) being supported by Washoe County and the Cities of Reno and Sparks. The County of Modoc has a long tradition of farming and ranching, and the production of agricultural products, including beef production, has the largest economic contribution to our county. The proposed Act would affect our family ranching constituents who have multi-generational ranching operations in Surprise Valley. These families conduct business in both California and Nevada through Bureau of Land Management (BLM) grazing permits, and many own private ground within Washoe County. Families have held many of these grazing permits for generations, and they take pride in being stewards of the land while promoting the access of public lands for all to enjoy through recreation, hunting, and tourism.

Consequently, the County takes great interest in expressing the concerns of our constituents who have worked tirelessly to advocate for a transparent and collaborative process concerning the original proposed Washoe Public Lands Management Act and the current proposed Truckee Meadows Public Land Management Act. The proposed Act seems to expand the efforts of the original Washoe Public Lands Management Act. This attempt at a land grab for developers is at the expense of our hardworking Modoc County families who will be severely impacted by this proposal and seems to be out of sight and out of mind for the Washoe County Commission.

The County of Modoc directly coordinates with the federal land management agencies as set forth in Public Laws 94-579 and 91-190 as well as other statutes and executive orders. This process allows for early meaningful involvement in plans and policy development and reasonable efforts to resolve differences between the local and federal positions. While we understand that Washoe County does not use this process, because much of the federal land potentially impacted by the Act lies within Modoc County's sphere of influence, the County

would like to propose the engagement of the Bureau of Land Management (BLM) on any projects triggered by the implementation of the proposed Act.

Additional concerns include the fact that the 1991 Wilderness Study Area (WSA) report clearly separates those WSA's that should be managed for multiple use from those WSA's that are suitable for wilderness. This report mirrors the recommendations provided to BLM by the Modoc-Washoe Experimental Stewardship Program (ESP) steering committee. The ESP represents a wide spectrum of federal land users including grazers, recreationist, university professionals, and environmental representatives who make decisions by consensus. Consequently, the BLM recommendations for WSA's management has had extensive public participation and review. We understand that there are reasons for small deviations given the change over the past thirty years, but the Act should be similar to the 1991 recommendations, which do not include NCA's.

Furthermore, the proposed Act bypasses the traditional proven process for designating land as an NCA. The current process to designate a NCA requires extensive stakeholder engagement through BLM policy. The County would oppose any designations of NCA's due to the lack of stakeholder involvement and transparency conducted under the proposed Act. NCA's are not managed for multiple use. The Black Rock High Rock NCA is an example where permitted uses have become significantly curtailed to the detriment of both the Washoe County and Modoc County constituents.

The Commission is aware that grazing, even though allowed by the Wilderness Act or other legislation implementing a new wilderness designation, universally suffers when wilderness is created. This happens regardless of efforts which are made to prevent this. Many wilderness designations since the writing of House Report 101-405 have included this report in the creation of legislation. Modoc County continues to support including the report in the Act. However, wilderness grazing throughout the West continues to come under heavy pressure and recommends strengthening the House Report. Therefore, the County urges you to include the grazing protection developed in Public Law 111-11, the "Owyhee Initiative" in the Act.

Modoc County encourages the Commission to return to the language of the original proposal, where a portion of the revenue is designated for conservation and resource enhancement projects. Modoc County would also like to recommend an advisory committee be appointed to provide recommendations on the best use of the funds. Two such Congressionally created committees already exist within the impacted area; a BLM Resource Advisory Council and the Modoc-Washoe Experimental Stewardship Program. Both groups would have such duties within their job descriptions. We also encourage that the Act direct the funding toward those areas in Washoe County, where the negative impacts from the proposed Act are going to occur.

We remain concerned that the Act sufficiently protects the management options needed to address the various resource concerns within the Acts boundaries. These issues would include achieving and maintaining appropriate management level (AML) for wild horses, enhancing greater sage grouse habitat, aggressively treating juniper encroachment, and providing suitable latitude for the Nevada Department of Wildlife to accomplish the appropriate predator control.

Due to the immense impact the Act will create, many Modoc County ranching families attended the public hearing held on January 24<sup>th</sup> and February 18<sup>th</sup> in Reno. Strong opposition was exhibited not only from these ranching families but included tribal members, geologists, outdoor

enthusiast, and citizens concerned about the process overall. Washoe County Commissioner, Jeanne Herman, who represents the area of Washoe County that will be impacted, also provided her opposition to the proposal.

Within the Washoe County Commissions Resolution of Support adopted on May 10, 2016 you state the following “that the Washoe County Board of Commissioner are committed to partnering with our Nevada Congressional Delegation and **other diverse stakeholders to develop a well-balanced approach** to comprehensive public land management legislation for Washoe County to facilitate job creation”. The Modoc County Board of Supervisors ask that you consider the unintended consequences the proposed Act would have upon Modoc County constituents and our county’s perilous economic viability. District I, Supervisor Coe, stands ready and willing to meet regarding this issue and is hopeful that the voice of constituents who represent both Modoc and Washoe County are represented in this important matter.

We appreciate your consideration of our input.  
Sincerely,



Elizabeth Cavasso  
Chair, Modoc County Board of Supervisors

*CC: City of Reno  
City of Sparks  
Nevada Department of Wildlife  
Congressman Doug LaMalfa  
Congressman Mark Amodei*