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### Preliminary Truckee Meadows Public Land Management Act

On behalf of the Sierra Club's 11,376 members and supporters in Washoe County, the Toiyabe Chapter is pleased to provide the following recommendations for the Truckee Meadows Public Lands Management Act (TMPLMA) proposals. We appreciate the work of Washoe County and the cities of Reno and Sparks to accommodate growing population and development needs, while at the same time protecting our open spaces, natural resources and air and water quality that support public health, prosperity and quality of life in the Truckee Meadows.

With Washoe County's population predicted to reach 543,000 by 2030\*, the bill drafting process must reflect the pressing need for thoughtful, appropriate, transparent and inclusive planning regarding the Truckee Meadows region and Washoe County public lands. The final legislation must carefully balance the area's economic development and growth needs, while prioritizing the conservation and protection of open space and natural resources for future generations. This process must recognize that the Truckee Meadows enjoys an exceptional quality of life because of its natural resources and that conservation values align with and strengthen economic development.

As currently proposed, the TMPLMA fails to appropriately balance conservation, recreation, and economic development. The massively large disposal area is alarming and promotes a high level of uncertainty and distrust of the land sale and development process. It could lead to the potential sale of 150,000 acres of public land to facilitate development, remove existing protections for wilderness study areas, and fails to permanently protect many key lands, including the Sheldon National Wildlife Refuge. This represents a significant loss for conservation.

Development in the Truckee Meadows must be driven by the principles of smart growth: the creation of energy-efficient, dense urbanization that meets the housing and service needs of all income levels and limits sprawl. Planning and development must also be done within a framework that acknowledges the impacts of climate change, the values of ecosystem services,

infrastructure costs, and climate-resilient sustainability for all residents within the Truckee Meadows. The transfer of public lands for development must be done judiciously with an open and inclusive public process that addresses the needs of growth while prioritizing conservation values. ([More information about climate, sustainability, equity and economics available here.](#))

## RECOMMENDATIONS

1) As the process moves forward for Washoe County, the Sierra Club is advocating for an open and transparent public review process that includes not only specific stakeholders, but the community at large. The 2018 iteration failed, in part, because the process lacked transparency and failed to engage the larger community.

*We support an Open & Transparent Public Engagement and Review Process: a) Public Meetings with Advance Notice; b) Review and Public Comment Period; c) Increased Public and Community Outreach; and d) Thorough and Accessible Online Resources.*

2) In general, the Sierra Club supports the retention of public lands. What is currently available within the Truckee Meadows for development and does (or doesn't) it meet the needs of the community for the next 20 years without acquiring public lands? Having this information available to the public would be beneficial.

Using the 'disposal boundary' approach is not a method we agree with. Instead, we recommend using the 2019 Truckee Meadows Regional Plan to direct and inform the prioritization of areas for potential development based on the tiered approach described in the plan.

*We support a structured, tiered approach to land disposal that identifies specific parcels for potential disposal rather than randomly establishing an arbitrary and excessively large "disposal boundary".*

3) Lands already acquired for protection purposes or having other federal constraints, must be excluded from disposal consideration. Identify all previous lands that have been added to federal ownership via SNPLMA and other public processes, such as the Land & Water and Conservation Fund. Such lands have come under federal jurisdiction via transfer, exchanges or donations, with public support and engagement. These lands have specific conservation restrictions based on the Congressional intent of the enabling legislation. These lands are not available for disposal and must be removed. The proposal must be based on accurate, up-to-date data and mapping regarding land ownership.

*We support the removal from disposal/development all public lands acquired specifically for conservation as determined by accurate parcel data and mapping.*

4) We support the preservation of open space and the conservation of public lands containing important wildlife habitat, cultural and natural resources and valuable recreational opportunities. These are critical to the quality of life for human and non-human inhabitants. These lands should remain public lands and be outside of, or exempted from, any defined disposal/development boundary.

*We recommend the following areas be excluded from disposal/development:*

- *BLM-designated environmentally special and sensitive lands: Incandescent Rocks Area of Critical Environmental Concern (ACEC), Carson Wandering Skipper ACEC, Pah Rah High Basin Petroglyph ACEC, Pah Rah BLM Sensitive Area, Petersen Mountain Natural Area and Sensitive Area, Hungry Valley Special Recreation Management Area, and the Virginia Mountains which are identified as "Recreational Lands".*
- *The Nevada Department of Wildlife (NDOW)- recommended lands to be retained as important wildlife habitat and popular recreation areas. These include the Dogskin Mountain, Sand Hills, Warm Springs Mountains, Hungry Ridge, Hungry Mountain, Bedell Flat , Fred's Mountain and a majority of the Pah Rah Range.*
- *The public lands identified in the Washoe County Regional Open Space and Natural Resource Management Plan and NDOW Nevada Crucial Habitat Assessment Tool as having high biodiversity and natural resource value, and ranked high for crucial wildlife habitat and species of concern. These include: the Carson Range, Virginia Mountains, Dogskin Mountain, Petersen Mountain, Warm Springs Mountain, Hungry Mountain, Fred's Mountain, Pah Rah Range and Peavine Mountain.*

5) This legislation presents an extremely important opportunity to designate protective status for landscapes surrounding the Truckee Meadows that have significant wildlife, scenic, cultural, recreational and ecosystem-service values. These areas need permanent protection to guarantee future generations have permanent access to open space and for the long-term conservation of wildlife, natural resources, and functional ecosystem processes. The Sierra Club, in concert with our conservation partners, would like to work with federal land managers and the Nevada Congressional delegation to determine the most appropriate designations for these landscapes.

*We recommend special protections for: Petersen Mountain, Dogskin Mountain, Virginia Mountains, Pah Rah Range and any areas with significant crucial wildlife and high natural resource values that may be identified through public comment or natural resource analysis.*

*We recommend Bedell Flats remain open space with minimal disturbance to native vegetation to maintain its integrity as wildlife habitat.*

6) We strongly support the Friends of Nevada Wilderness and The Wilderness Society's comprehensive proposals for wilderness and National Conservation Area designations. Northern Washoe County has abundant public lands with exceptionally high conservation values and protection of these landscapes aligns with the Sierra Club's 30-by-30 campaign to see 30% of our planet protected by 2030.

7) We request a Preliminary Natural Resource Analysis for all lands proposed for disposal in the legislation. These include: "environmentally sensitive lands that promote the preservation of natural, scientific, aesthetic, historical, cultural, watershed, wildlife, and other resource values; enhance recreational opportunities and public access; provide for better management of public land through consolidation of Federal ownership; or otherwise serve the public interest." (SNPLMA, Strategic Plan, P. 9) Such a preliminary analysis needs to be conducted before lands are considered appropriate for transfer from federal jurisdiction.

A comprehensive review of the 2001 and 2014 Carson City BLM District Office Resource Management Plans (RMP) would be a good starting point since they have already identified environmentally sensitive lands as well as disposal lands. The Washoe County Regional Open Space and Natural Resource Management Plan should also be used in the analysis since it identified lands with all of the above values as well as areas high in biodiversity.

*We support a Preliminary Natural Resource Analysis for all lands considered for disposal. Lands identified in the RMPs and subsequent Natural Resource Analysis as being environmentally sensitive and/or high in biodiversity should be excluded from disposal/development.*

8) The legislation needs to establish careful criteria for the transfer and sale of public lands.

*We recommend the legislation establish criteria for the transfer and sale of public lands with the involvement of the public and natural resource & wildlife experts.*

*We support adherence to the 2019 Truckee Meadows Regional Plan for sustainable growth and development and recommend legislation mandate that all land conveyances are in compliance with existing land-use plans.*

There are currently 105 land transfer requests from 11 entities that total 6,552 acres. Additional information about purpose and need is necessary before comments can be made.

Thank you for ensuring The Truckee Meadows Public Lands Management Act will address our concerns. We would appreciate the opportunity to give input and comment on draft legislative language once it has been developed.

Sincerely,

A handwritten signature in cursive script that reads "Anne Macquarie".

Anne Macquarie, Chair  
Sierra Club Toiyabe Chapter

Cc Washoe County Commission  
Senator Catherine Cortez Masto  
Senator Jacky Rosen  
Congressman Mark Amodei

\*State Demographer Report, dated 10/1/2019, p. 17

(<https://tax.nv.gov/uploadedFiles/taxnvgov/Content/TaxLibrary/2019%20Projections%20Final%20Cover.pdf>)