



Tuesday, July 25, 2023

To: Senator Jacky Rosen & Staff

From: Bryce Pollock
Nevada Chapter of Backcountry Hunters & Anglers (NV BHA)

Re: Washoe County Lands Bill

Dear Senator Rosen & staff,

The Nevada Chapter of Backcountry Hunters & Anglers (NV BHA) recognizes & is grateful for the adjustments made to the most recent revision of the Washoe County Lands Proposal. In this revision, it is clear that comments on the last revision from NDOW & sportsmen/women organizations were heard & proactively addressed. We believe our valued NV wildlife will benefit from these improvements.

The expansion of the Hays Canyon, Massacre Rim, & Smoke Creek NCAs is a welcome addition to the proposal, & we are excited to see those areas protected while still being able to effectively manage their wildlife resources.

While we do highly appreciate the significant reduction of land transfer proposals in this draft, we share some of the concerns with other conservation groups in the newest proposal. Regarding the Truckee Meadows portion of the draft:

- Mustang disposal: the disposal of parcels 084-172-17, 084-172-18, 084-172-20, & 084-172-05 will limit access for Truckee River waterfowl hunters & Truckee River anglers to a large stretch of the river. These parcels are a key access point to an otherwise inaccessible portion of the Truckee River. Furthermore, development here will also limit access & could affect the recent restoration efforts in the area to the East of these parcels. Disposal & development here would also interrupt the existing Tahoe Pyramid Trail & we are concerned that there is no language or protections for the public in this disposal to ensure access & preservation of an area with such a high natural resource value.



- PahRah disposal: the disposal of parcels 084-010-08, 084-010-51, 084-010-05, 084-010-04, 084-010-02, 084-020-13, 084-020-14, 084-020-15, 084-020-17, 084-020-19, 084-020-20, 084-030-22, 084-030-21, & 084-110-21 would potentially result in the transfer of public lands to highway construction, private development & expansion of urban areas. As basic policy, BHA opposes public lands transfers that result in the loss of undeveloped public lands that we the public will never get back. Those particular parcels, in addition to being undeveloped, hold valuable wildlife & cultural resources. We maintain our previous position that there are better alternatives for transportation solutions to USA Parkway & the Tahoe Reno Industrial Center (TRIC). Examples include private charter busing from Sparks to Fernley and/or Passenger rail cars on existing railways or a passenger rail system similar to the monorail in Las Vegas. There is enough infrastructure & workforce in the TRIC to justify & contribute to the cost of efficient & convenient mass transit solutions that don't require & expansion of the City of Sparks & the loss of intact habitats on public lands. We also maintain our position in support of infill over expansion & believe there are many parcels that could be transferred & developed in the City of Sparks that are not intact habitats.
- PahRah Mountains Pyramid Tribal expansion: This proposal needs a better map for us to determine if significant wildlife resources might be affected. We need clarification of the proposed boundary to ensure it does not include the roadless area along the peaks of the PahRahs. This area is key to mule deer & other wildlife as a safe refuge from motor vehicle disruption.



- Washoe County Shooting Range Addition: We fully support the addition of a county shooting range & feel this will make the opportunity to safely practice shooting sports more accessible & convenient to the public in Washoe County. However, we are concerned with the details of the range & suggest more clarity around the development of the land. Explicit language is requested on the following points:
 - Measures to be taken around fire prevention & emergency services access.
 - The land is to be used exclusively for a public shooting range.
 - The parcel is around 4 square miles, & our concerns are that a shooting range does not require that much land & there will be potential for other development within those 4 square miles.
 - Access to & from the range
 - We would recommend language to outline a single route for the general public to use to access the range & avoid fragmentation as the area is critical Mule Deer habitat.
 - Enforcement resources
 - The area to the South of this parcel has been largely fragmented due to off road vehicles creating new routes & the absence of any enforcement has contributed to the decline of the Mule Deer habitat in this area. We would recommend language to explicitly outline what agencies would be responsible for enforcement to prevent fragmentation after the transfer of this parcel to Washoe County
- The Washoe tribe trust lands along the Southern Washoe border: we would appreciate discussions for clarity about access & a few other issues.
- Tule Peak SMA: Please clarify regarding wildlife management & travel management plan as it is habitat important to both sage grouse & mule deer.
- Petersen & Sand Hills: We appreciate the withdrawal proposal but would like more details about how permanent that might be. These are important areas to what remains of our mule deer herd along the Sierra Eastside front yet suffers increasing fragmentation by intense OHV use. Is the plan to have BLM propose a management plan revision for those 2 areas?



Regarding the Northern Washoe portion of the draft:

Clarification that the NCAs established in the bill will be withdrawn from mineral exploration & energy development would be appreciated. Does the establishment of these NCAs mean permanently withdrawn, such as Wilderness designation provides? We look forward to participating in stakeholder groups advising on enabling language & management plans for each of these areas.

- More detailed maps regarding designated motor routes in the NCA's & cherry-stemmed routes in the Wilderness areas will be essential for our final approval.
- We will stay tuned regarding primary designation/management of the Fox Range.
- NV BHA remains concerned about the US Fish & Wildlife Service (USFWS) Sheldon Wilderness proposals until such time as the BLM/NDOW MOU revision gets final approval. It is frustrating to continue to list the uncertainties regarding wildlife management in Wilderness when so many of them are resolved in what remains a draft somewhere in the BLM pipeline. We support a stakeholder meeting with the USFWS and NDOW to review maps & discuss potential wildlife management concerns on a site-specific basis. In addition to clarify any differences between USFWS's Wilderness Management Plan and that of the BLM Wilderness Management Plan.
- If you have not already done so, NV BHA recommends that you & your staff have in person conversations with both NDOW & BLM regarding the specific management concerns. That might be reassuring to both entities, as well as sportsmen/women & other conservation groups that there is hope these concerns can addressed to mutual satisfaction.



The portions of the proposal we fully support are:

- The conveyance of the Scripps WMA to NDOW
 - o We are very excited to see this conveyance & are hopeful that management of the area by NDOW will result in effective management of the horse overpopulation & allow the area to be restored & wildlife to return.
- The mineral withdrawal of the northern portion of Granite-Banjo, along with establishment of the Bitner Table Wilderness, Granite-Banjo Wilderness, Burro Wilderness, & Wrangler Canyon Wilderness
 - o These proposed wilderness areas have been thoroughly discussed & compromises agreed to by all affected parties. These new wilderness areas will give permanent protection to many high value public land areas & wildlife resources.

We thank you again for the thought & consideration of citizen concerns you put into this version of the proposal & look forward to participating in the process of making the necessary changes that benefit all parties involved.

With gratitude for your dedicated public service,

Bryce Pollock
NV Chapter Backcountry Hunters and Anglers
Policy Committee and board member