

LATE MATERIAL
MEETING DATE 12-6-12
ITEM # 20B.

December 6, 2012

Ms. Colleen Sievers
Bureau of Land Management
Carson City District Office
5665 Morgan Mill Road
Carson City, Nevada 89701

Re: Revision of the 2001 Carson City Field Office Consolidated Resource Management Plan

Dear Ms. Sievers,

Carson City has agreed to participate in the Bureau of Land Management, Consolidated Resource Management Plan Update planning process as a cooperating agency. In addition to our staff's continued participation at meetings, Carson City submits the attached comments addressing several of the issues that have been identified through the scoping sessions and our advisory boards. We look forward to this collaborative effort and further discussion as it relates to Carson City. Thank you.

Sincerely,

Robert L. Crowell
Mayor

**Carson City Concerns and Needs
Regarding
Carson BLM RMP/EIS**

1. Wildland Urban Interface (WUI) – Carson has aggressively planned for and carried out an ongoing fuels management program at the WUI where threat of wildfire is constantly an issue. To continue active treatment of fuels and assure safe conditions around the City, it is imperative that the BLM and City work closely to bring sound science, updated planning and timely treatment to areas identified as threats. BLM manages significant acreage within Carson City, both at the interface and in the remote areas. Both areas are of concern, but the interface represents an area where the two entities can accomplish the greatest need at the present time. Provisions should be made to allow for cooperative plans and ongoing maintenance for brush and invasive weed control by using all potential tools (grazing, mechanical, herbicides, etc). Plans should include seeding selected areas to fire resistant species such as crested wheatgrass, Siberian wheatgrass, Sandberg's bluegrass, and forage kochia. While several of these are exotic species, they have shown to be competitive with cheatgrass and can stop wildfires when managed properly.
2. Fire – The City is sensitive to the growing number of wildfires on public lands in our region that have not only devastated resources and watershed, but also private properties, including some loss of life. For example, the Pine nut Mountains have experienced several wildfires this year with a loss of public land and some private property. Also, two wildfires devastated areas on the west side of Reno while destroying several homes last December. The ongoing drought conditions further exacerbate an already brittle and dry fuel laden rangeland in our region and thus warrant the City and BLM meeting to discuss and strategize alternative approaches to reduce rangeland fuels on BLM lands in the region. Because Carson City has an active and much valued Open Space program, recreationists (i.e. hiking, trail biking, running, etc.) are at continual risk from threat of wildfires during the fire season when the back trails are used the most. As such, the City requests provisions for close coordination and aggressive initial attack on fires that start on BLM lands and that have the potential to burn into the WUI. In addition, developing more remote water sources for fire suppression support should be a consideration. Spring developments might well serve as backup waters for this purpose. Where possible, providing large diameter water tanks, and/or impoundments that can be utilized for fire suppression (drafting water for engines and helicopter dips) could prove beneficial to help protect rangeland resources. Also, some ranchers owning private stockwater on the public lands might also be interested in cooperating on some of these types of developments.
3. Upland Recreation – As recreation grows in the area, the City wants to continue coordinating with BLM to plan for additional trails, access areas, and means of dispersing recreation in a manner that minimizes conflict between users and to avoid future resource problems. Examples of conflicts might include bikes on jogging /hiking trails, horseback riding in inappropriate areas, or ATV / motorcycle use in areas not

suitable or designated for these activities. OHVs can often become the source of active erosion, also in recruiting invasive species unless carefully directed to area of suitable soils and monitored regularly. In Carson City, specific examples include multiple user-built routes on steep hillsides leading to the Carson River as well as the problem of OHVs driving in the riverbed during low-flow years. This is particularly important for BLM planning because almost all of the feasible OHV/ATV/ Motorcycle use is on BLM land. There is an important designated motorized-use area at the south end of Prison Hill, but in other areas the conflicts with motorized vehicles on trails are an increasing problem. Coordinated planning, signs, maps, etc. will help to avoid such conflicts.

Please note that the Carson Vitality Act of 2009 provides for the withdrawal of mining uses within the urban interface. *Similarly, OHV use is limited to designated trails and roads in existence at the time of adoption of the lands bill, until superseded by a vehicle management plan.*

The slopes and hills visible from Carson City are an important component of the scenic resource and must be managed to avoid degradation of the natural and scenic resources. This is of special significance along the Carson River.

4. Water Based Recreation – The Carson River has grown to be a very desirable focal point for recreationists, particularly with the provision of river access for hiking, rafting and kayaking. The BLM has been a good partner in efforts to identify and plan for the river recreation activities and the city wishes to build on this relationship to expand water recreation experiences for the public. Safety is an ongoing concern along the river corridor, as medical and police services are a fair distance away, affecting response time for potential emergencies. The City appreciates any opportunities to plan and cooperate with BLM regarding safety concerns along the river corridor.
5. Water Resources – The City is aware that natural springs occur on the public lands throughout the District, many of which are not presently privately owned waters. Developing these springs to allow for wildlife, wild horses, livestock, and where possible backcountry recreationists to utilize as safe water sources would greatly enhance the quality of backcountry experience and add value to our public land resources.
6. Wild Horses – The City supports careful and ongoing management of wild horses where the public can enjoy these animals in a safe, managed environment. Unfortunately, some herd stallions are known to sometimes demonstrate a threatening behavior to the *public who* recreate in the park environment along the Carson River. The City would like to work with the BLM to develop safe conditions in the park area that allows for families to recreate and enjoy the wild horses without fear of harm. Despite the ongoing controversy concerning the wild horses, they should be managed for appropriate management levels within the herd management areas and not be allowed to damage or overgraze the rangelands or riparian areas critical to wildlife, watershed, and other. The BLM should be decisive in managing wild horses and support all proposed decisions with sound monitoring data to help avoid lengthy and

costly legal challenges. Monitoring will also help to avoid conflicts with other users such as livestock grazing and wildlife. *It is the City's position that BLM must continue to manage as provided by the authority granted through the Wild and Free Roaming Horses and Burros Act of 1971.*

7. Livestock Grazing – Following the devastating 2004 Water Fall fire, the City worked to implement its fuels management plans to help avert a reoccurrence of this tragic event in the future. A vital component of the fuels management program has been introducing prescribed sheep grazing at the WUI, including the watershed to the west of Carson City as a biological means of reducing fuels and encouraging green conditions through the spring and early summer. The success of this program is a product of careful planning and public education. The *public* now anxiously *awaits* the arrival of the domestic sheep in the spring of the year to assist in this vital fuels reduction program. Mechanical treatment is also an essential component for brush control in combination with the grazing. Wildfires have also occurred on BLM lands near Carson City through the years with each presenting its own risks. The City is supportive of livestock grazing on public lands as a valued tool to help reduce the invasive species such as cheatgrass, an annual flashy fuel, and also to help manage perennial fuels. Carefully planned grazing can help to harvest excess fuels, reduce cheatgrass occurrences and promote conditions more conducive to less destructive natural fires. Clearly, fire is a part of the natural processes but reducing or managing the fuels is essential to help prevent catastrophic events. The City is aware that bighorn sheep have been, or planned to be introduced on private lands near Virginia City. These bighorns went in with the understanding that there would be no limitations on the existing sheep allotments around Carson City. The City *supports* the potential use of sheep grazing on these allotments and the WUI perimeter of Carson City.
8. Weed Control – The City is concerned with the occurrence of invasive species like cheatgrass and also the potential for another invasive annual grass, medusaahead wildrye, to invade the area. While grazing helps to combat some invasive species, chemical herbicides sometimes are the only means of eliminating some species, such as medusaahead wildrye. Livestock will not willingly graze this species. Noxious weeds remain a high priority for eradication or control and the local weed coalition works to identify and address the problem. Carson City appreciates opportunities to coordinate with BLM on weed control efforts, especially when noxious weeds are located on BLM managed lands. Similar to fuels management, the City recommends that the RMP include provisions that allows the use of multiple tools to manage noxious weeds, and when possible work collaboratively with the City to ensure infestations adjacent to City owned lands and treatments may be addressed in the most effective and efficient manner possible. BLM staff should be informed regarding new herbicides and make efforts towards their use on lands throughout the region.
9. Wildlife – Wildlife on public lands are important to Carson City and its residents. Wildfires have greatly impacted the wildlife habitat surrounding Carson City and are likely a major factor that has encouraged the presence of a resident deer herd that once was migratory. Deer now fawn in and around the City and forage on neighborhood grazes, forbs, and ornamental plants year round. This concern will further exacerbate

unless the deer can be drawn back to their natural environment. The City is anxious to explore opportunities to work with BLM and other agencies to identify cooperative habitat improvement projects on the public lands to help address this concern. Habitat improvement projects throughout the District are encouraged, and planning needs to be integrated so that wildlife values and fuels /WUI projects do not interfere (i.e. use of forage kochia in the interface areas rather than bitterbrush and sagebrush).

10. Threatened and Endangered Species – While Carson City is not aware of any endangered species on the BLM managed lands near the city, there is an ongoing concern to assure that a listing does not occur that will negatively impact multiple uses on BLM lands. Sage-grouse are recognized as a species that could have far reaching consequences across the public and private rangeland areas of the District if listed. While the City is not aware of any identified critical sage-grouse habitat within Carson City proper, there may be potential habitat areas such as stringer meadows and springs that can be cooperatively improved to entice sage-grouse use and help to avert a listing of the Bi State species. The City supports all reasonable approaches, in balance with multiple use and industry, short of listing directed toward conservation of sage-grouse. The City strongly encourages the BLM to pay heed to and utilize the recommendations recently set forth by the Nevada Governors Sage Grouse Committee.
11. Cultural Resources – Historic land occupancy by Native Americans in Nevada, and later settlements by pioneers throughout the District, is of great interest to many Carson City residents. The City supports carefully developed plans that when implemented assure protection of these resources while affording public education and enjoyment of these sites. When historic sites are identified within the Carson City proper, the City wishes to become actively involved in the planning effort to help educate and benefit the public. In addition the City requests aggressive action by BLM to inventory and clear the WUI area to allow for weed/fuels management and timely rehab should a wildfire occur in this area. The time required for cultural clearances can greatly impact critical area treatment and the window needed for treatments such as drill seeding.

Carson City, the Nevada State Office of Historic Preservation, and the Bureau of Land Management have entered into a programmatic agreement providing for the procedures to be used for the management of cultural resources on areas approved to be transferred to Carson City through the Carson City Community Vitality Act of 2009. These procedures also apply to the former Bently property located within the Carson River Canyon and partially acquired through funding from the Southern Nevada Public Land Management Act – Parks, Recreation and Natural Areas.

12. Pinyon-Juniper Woodlands – These woodlands exist in several parts of the Carson BLM district and when properly managed contribute an array of values including watershed, wildlife habitat, pine nuts, scenic, firewood, etc that are important to City residents. The BLM action to thin these woodlands and reduce the higher density stands to appropriate stages and placement on the landscape is imperative to the health of the woodlands. Treatment will help restore habitat important to sage-grouse and other species representative of the sagebrush-grass ecosystem. It is reported that 50-60,000 acres of p-j woodland is converting from phase II to phase III woodlands each year.

This means that they are crossing a threshold to a declined condition where management will be unable bring about a natural response to regain a desired seral condition. New studies underway, such as that occurring at Porter Canyon in the Desatoya Mountains suggest that it may very well be possible to release understory vegetation, free up ground water and reestablish or rejuvenate meadows and springs by p-j tree thinning in appropriate locations. The City supports this kind of research and proactive work, particularly as climate change continues to impact the West with ongoing drought. The City is also aware of and supports the statewide cooperative efforts being carried out by the Nevada Pinyon Juniper Partnership to encourage much needed treatment and utilization, wherever possible, of the pinyon-juniper woodlands. Carefully planned harvest treatments and utilization of excess biomass from these woodlands can improve rangeland and watershed health while also providing much-needed jobs and improved economies. Biofuels, wood pellets, biochar and combined heat and power (CHP) facilities are examples of the many valued uses for biomass from the pinyon- juniper woodlands which may potentially be the best form of alternative (green) energy in Nevada going forward. The City also encourages and supports the use of such activities as commercial wood cutting permits, stewardship contracts (10-20 year) etc as tools to promote necessary treatments at a cost savings to the BLM while also providing jobs.

13. Solar, Geothermal, and Wind Power Sources – The City supports alternative (green) energy when it is properly located and acceptable to the public. Energy farms (wind/solar) take considerable land area and can potentially affect other uses and/or scenic values on public lands. Proposals for such developments should be brought before the local communities early in the process and allow adequate time to assess the project and its potential impacts on the land and communities.
14. Public Education – Open space users are generally interested in their environment and the concepts of sustainable use. However, many are in need of the tools and education to become true stewards of the open space and associated resources. A comprehensive outreach program to include workshops, maps, brochures, educational programs, signage and other educational tools will help tremendously in making users knowledgeable and responsible. There will still be some enforcement needs, but the goal should be to educate as a key element in advance of enforcement.
15. Lands and Realty – The City is interested in working with the BLM through the RMP planning process to identify parcels of land that might be designated or transferred to the City from public lands for public purposes to be determined by the City.

The City wishes to complete the transfers of land approved through the Carson City Vitality Community Act of 2009. Some of the “clean up” issues that remain are:

- 1) There are two encroachments from the State of Nevada previously authorized by the Bureau of Land Management into areas designated as part of the transfers to Carson City.

- 2) Additionally, there is an approximately 38-acre parcel at Koontz and Edmonds that should also be transferred to Carson City.
- 3) Approximately 58 acres of Silver Saddle Ranch should be transferred to Carson City. They were inadvertently missed as part of the mapping for the Community Vitality Act.

16. Special Designations – Carson City does not recommend any special designation within our jurisdiction. The Silver Saddle Ranch, Prison Hill, and the Ambrose Natural Area are being transferred to Carson City subject to a conservation easement that ensures resource protection.