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**To:** Public Comment <[PublicComment@carson.org](mailto:PublicComment@carson.org)>  
**Subject:** Public Comment: OSAC meeting 4/18/22, Agenda Item #7, PH Management Plan

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These comments are to address the PH Management Plan: 5.0 OHV Area

I think the goals and implementation win the OHV area, needs to be accelerated. This project was contracted out in 2018, with goals and plans identified and unanimously voted on by OSAC and BOS October 2018 — almost 4 years ago.

It has been on the ground since 2019 --- for 3 years.

I am told to wait until the end of the project, to evaluate it. I maintain that the impacts occurring along the way will be more involved and expensive to fix, at the end. Why not E=Evaluate along the way, and address impacts and problems as they occur. No problems, only solutions: an active dynamic process — that protects the land and the opportunities, every step of the way.

New trails/road/areas have been constructed and 2 Interim Maps with Avenza Apps were released to the public. Boundary, Staging Area, Open Area signage was installed 2019-2020.

However, there was no on the ground trail signage until initiated in May 2021. It is still in process. And ONLY in the small West Basin Area (which is ? 30% of the entire project).

The lack of signage is a big factor: riders don't know where to go. Signage was one of the main goals of the project as stated in its presentation October 2018, and unanimously supported by OSAC and BOS.

I think the lack of it is a real failing of this project.

Yes, the Staging area is an awesome and professional 'welcome' to the area. And yes, the 'feel' in the area has improved — feels wholesome and safe, with cooperation among all the many users there. And yes many new sustainable roads and trails have been constructed. However, along with all these 'good' things — let's address impacts as they are identified, before they get worse! Let's put into practice the 4 Es, presented by NOHVCC and voted on unanimously by the OSAC and BOS. Maybe include that in the Management Plan for the OHV area? Creative and useful and applicable!

Below are some of my recommendations I hope you will seriously listen to and consider, to add into the PH Management Plan. These are based on my on the ground recreation in this area, for decades — but more intensively since the project has been initiated. I run/hike/mtn bike AND dirt bike throughout the ENTIRE area. I have one foot in each world!: nonmotorized and OHV! I have explored every inch of the OHV property, using the Interim Map and Avenza App to find each and every designated route. I have inquired (as part of the Working Group) for definitions of each OHV (specs/use) and terms in the OHV Management Plan (i.e. what is an 'Open Riding Area'). I have observed the OHV use on the property — where and how they each use (and how they impact) the land. How many of you OSAC members and BOS have been in the heart of the riding area, on foot? None (but 1 or 2) have taken me up on my offer to site tour the property. Yet you are making judgments about and decisions for, this project.

**A: SECURE THE BOUNDARIES SOONER RATHER THAN LATER** into the nonOHV area, private properties on Golden Eagle Lane, and into the Carson River immediate watershed (to and through Mexican Dam and Golden Eagle Open Spaces).

1). Secure the east boundary above the River, from Golden Eagle Open Space up above Mexican Dam Open Space and the private properties. The signage and fence sections are not stopping trespass.

Tracks around the signs and fencing, are evidence of the trespass AND the Rangers and Gregg Berggren (and the public) have seen riders coming out from the Mexican Dam — on the nonOHV road — into Silver Saddle to Carson River Road.

**Aggressive riding down the steep very erosion prone slopes to the River.**

Citizens on Golden Eagle Lane (near the Golden Eagle Open Space) are complaining also, re ongoing trespass on their private property (accessed by riding past the OHV boundary lines).

2). Secure the Summit with more fencing: riders observed by Rangers and Gregg Berggren (and the public) coming down from the Summit — then down Dead Truck Canyon — through Silver Saddle to Carson River Road.

**Think: “I am the Carson River Watershed”. Maybe make #1 and #2 a “I am the Carson River Watershed” campaign?**

3). Secure the west boundary where trespass noted: definitely at the entrance to Dead Horse Canyon

**B: SIGN ALL TRAILS that were designated on the Interim Map (published 3/11/20) — it has been 2+ years. Signage was a main goal of the project from the get go.**

1). Sign ALL trails that are on the ground now per the Interim Map released 3/11/20!!!!!! Only the West Basin (SW slope) has been trail signed, and that is still in process.

None of the designated trails east and above 'Off the Trailer' and the main road from it to Golden Eagle Rock are signed. None of the ridge slope designated trails

from Golden Eagle to the Summit are signed. None of the trails from the Summit down to Golden Eagle Open Space, or from the east boundary above the River to "Off The Trailer" are signed.

Users are not consistently referring to the map or Avenza App. Signage on the ground is what is needed — as identified as a goal at the outset of the plan, October 2018 — and approved unanimously to be done, by OSAC and BOS. Signage is probably the most effective way to keep riders on designated roads and trails, preventing trespass and resultant impacts to soil/vegetation/visual resources.

All the signs and rules say "Stay on Designated Roads and Trails". But how do riders know WHAT trails are designated, if they are not designated!!!!!!???????

**C: SIGN NEW TRAILS AS THEY ARE CONSTRUCTED. Isn't this logical trail plan implementation?**

1). MANY new sections of Not so Easy Rider and Toad Rock Loop were constructed Fall 2021. And single track? They are NOT YET SIGNED outside of the small West Basin Area. Why not sign the trails AS THEY ARE BUILT?

These roads are being **promoted in video on Parks and Recreation/Open Space FB** — but riders can't find them! Riding around the backside of the OHV property, looking for them, riding whatever trails they see

(whether on the Interim Map or not). Creating more impacts that will have to be addressed — when the goal of the project is to prevent more impact and mitigate past impact, via trail signage and boundary signage!

Let's get it done. **Put in a new trail — put up new signs to identify it!** I am sure the OHV partners would love to help. Even color coded survey tape be effective. Non-motorized folks could help with that.

If labor is the issue, let's get more of us involved! Pride of ownership!

2). From my observation of even MORE orange flags going in to mark new trails that will soon be constructed (through intact soil and sagebrush, and across washes): trails are going in at an alarming rate, relative to closures AND on the ground signage identification of these new trails. Wouldn't it cause less impact, and contribute to 'responsible riding', to sign each trail as it is constructed? — before constructing yet another 'undesignated' trail? Especially since none of

these new trails are on the current Interim Map or Avenza App — so no way for users to find them amidst all the new and old 'existing' and undesignated 'designated' trails.

It's the Wild Wild West out there.

**D: Ask or Trail Designer/Consultant to work on the project during the Winter Months (from Oct-Nov to April-May)? OR subcontract with someone who can (not just do construction as Horizon is doing now, but be on the ground, evaluating the project, interacting with users). Why does the contract not stipulate year round work on the ground?**

1). When working on the property, the Trail Designer/Consultants are 'a positive presence'. They effectively and positively interact with the users, ask their opinions, observe impacts (and hopefully address them).

They E=Educate. E=Evaluate — how do the riders like the trails, observe trespass off the trails, make sure signage is in place and accurately guides users, naturalize trespasses to discourage following rogue tracks, etc.

E=Enforce — more signage, fencing, to address trespass and impacts E=Engineering — revise trails as needed to ensure resource protection, mitigate erosion, eliminate fall lines.

Train volunteers to help naturalize impacted areas: rake, mulch. We are ready to help. These 4 Es are a MAIN component of the OHV Management Plan/RecConnect Site Assessment and ALL the grant applications.

And were voted on unanimously by OSAC and BOS, Fall 2018.

2). Work CAN be done all Winter long — with exception of the few storm days! We are all out hiking/running/mtn biking/rock climbing/and OHVing all Winter long! Many sunny blue sky warm days. And we dirt bikers have to wear layers of clothing and protective armor, and our helmets and gloves, so keep warm no problem. Folks in quads and wheelers and crawlers can dress in winter clothing — and some of the vehicles are even heated. Our Public Works and Parks and Rec Maintenance crews and Open Space staff and Rangers are all out, all Winter long. And NDOT and other State Agency employees work outside in Winter.

Can't our Consultants do the same?

3). Lack of work in the Winter allows more damage/impact to occur. Projects left undone, unsigned, unfenced. More trespass within the area, and into nonOHV and River corridor areas —— because less oversight/presence and patrolling/monitoring. Our Open Space staff is working in ALL our Open Space properties. They can't be the presence at the OHV area, that a working Consultant could be. **The grant funds from RTP and NV OHV Commission were to improve the area, mitigate past impacts, avoid current ongoing impacts (by signage/fencing/and the 4 Es). Instead, MORE damage is occurring in these 'unattended' Winter months. So more grant money will be needed to 'fix' this damage that occurred during the actual "Project". Oxymoron?**

**E: Speaking of "Protecting the Integrity of the Area and protect unique natural resources" maybe re-evaluation of the trail plan should be part of the PH Management Plan?**

**1). Why is cross country riding across intact biotic crust and vegetation, being allowed/designated in 6 acres of Open Area? Documented in the recent RCI Study.**

Remember that the definition of Open Areas is: "areas where riders can ride anywhere on/over/through the terrain within the boundaries of these areas" (per email from NOHVCC our Consultant, to me and Gregg Berggren, December 2, 2019, in response to my request for a definition). **Is this 'sustainable' or 'sacrifice'????**

**SACRIFICE is NOT a word in the NOHVCC OHV Management Plan/RecConnect Site Assessment that OSAC and BOS voted for unanimously.**

**OR in any of the grant applications (RTP and NV OHV Commission).**

I request re-evaluation of the sustainability of including 2 acres of intact biotic crust and vegetation in 'Lower Headlight Open Area' and 4 such acres in 'Off the Trailer'. Documented in the RCI Study.

Take them off the map.

This is ONLY 6 acres out of 30 acres of Crawling cross country Open Area and 20 more acres of sandy MX and Sand Lot Open Cross Country area: approx 50 acres of Cross Country Riding opportunity.

YES, riders ARE riding into these intact areas. NO, they aren't staying on existing trails. YES, their tracks are proof of the trespass. NO, they are not complying with the "Don't Crush the Brush" sign at the entrance to the Off the Trailer Open Area

(which by definition is a cross country riding invited/allowed/expected area): another oxymoron of the project?

Re-evaluate 'Off the Trailer' as an Open Cross country riding area. Make it a "stay on designated roads and trails only' area. Existing established roads and trails lead to all the rock crawling opportunities, NO NEED to invite riders to ride across/through/over the intact soil and vegetation present here. This just increases erosion, downstream sediment flow, impact to Golden Eagle Lane and the Carson River watershed.

**The recreational opportunities of Rock Crawling will still be protected — while protecting our natural resources. A balance that this project touts is a goal — in all the documents and grant apps associated with it.** There are 2 other Open Cross Country Crawler Areas: 'Ghost' and 'Central Headlight', that are more consonant with the statements of NOHVCC, RecConnect, and the RCI Study: more bedrock, less vegetation and sand, more capable of withstanding the use.

**2). Re-evaluate the sustainability of the trails designated in the ephemeral stream washes. I estimate that approximately 1500' our of 9000' of Crawler/Wheeler Routes in the West Basin are not sustainable**

— routes were designated in narrow vegetated ephemeral stream washes. Designated established roads run parallel to these 1500' of wash trails, up on their shoulder. Redundant to have 2 trails, especially when the one in the wash is not sustainable. Destruction of the soil and vegetation on banks/slopes, is causing more erosion and sedimentation downstream, changes in micro topography and negative visual impact — all of which will be ongoing. **Documented in the RCI study.**

If this erosion process wasn't occurring/and increased as a result of riding in the washes, you wouldn't need to construct more/bigger/better rock dams and containment basins, in every wash that the OHVs ride, right?!!!! AND, along the roads they ride, and in the Open Cross Country Areas they ride!!!! MORE drainage features than originally 'engineered' for this project. Once Open Space realized they needed to comply with the City's own CCMC (12.18 and Title 13, and SWPPP requirements), the number of drainage features dramatically increased to address the identified impacts. My literature review (separate public comment for Agenda #6) of scientific studies of ephemeral stream washes, supports that these features are unique natural resources that should be protected: wildlife habitat, transit routes, water source, intact vegetation on banks and slopes that protect from erosion. I wonder why the Final RCI Report concludes "the geomorphology of the area supports OHV use with very limited resource impact...and therefore will not be compromised by OHV use".

I have photo documentation I can share, of these ongoing impacts — over time — as a result of inclusion of the ephemeral streams in the trail design.

**F: Continue to eliminate the sandy fall line trails. Re-evaluate the new fall line trails included in the Interim Maps, and old existing fall lines that have not been decommissioned. Fall lines are counter the NOHVCC OHV Management Plan/ RecConnect Site Assessment (voted on unanimously by OSAC and BOS). Some examples of sandy (not bedrock) fall line sections of newly designated roads/trails:**

- 1). Lower westernmost trail below Rhino Rock, where it crosses 'Once is Enough' wash
- 2). New lower 'Mailbox' Loop off Cable Road
- 3). All the Mailbox escape routes that are not yet closed off along the Mailbox Route in the wash

- 4). Designated access Route in/out of Double Waterfall, and at the head of Double Waterfall in/out of the Ghost Open Area
- 5). Access Routes in/out of Death Wall
- 6). Cable Road across 'Once is Enough' wash
- 7). Lateral Road across lower Headlight wash (at Death wall confluence, drainage feature)
- 8). Route east of Golden Eagle Rock, where the road from Golden Eagle Rock ends at a T intersection. Across the wash is a long fall line trail up to the opposite ridgeline.
- 9). And others — re-evaluate throughout the property.

**G: BEGIN restoration in earnest: reseeding, narrowing of trails/roads, reseeding.** The burned area on the upper ridge line has not been addressed, since it burned June 2019. Riders are putting in a track/donuts there.

Work with NV State Lands re restoration of the burned area (Memorial Day Weekend, 2021) in Lower Off the Trailer (NV State property — but caused by an OHV trespassing off the entrance road to Staging Area, down into the wash, documented by the Fire Evaluation Team). The only restoration area so far, is the west side of the Staging Area, done in 2019. Nice job. Improves the Staging Area dramatically. No other restoration/rehab/reseeding projects on the OHV property yet. Closures and mechanical (by the heavy construction machinery) 'rolling' of the soil/vegetation has been started. Well done, effective, positive features. But no restoration of trespassed impacted widened areas and wash damages, 3 years into the project. As ongoing impacts continue — that will have to be restored.

**F: Visual Impacts: will be increased as vegetation is sacrificed in the intact sections of the Open Areas.** Visual impacts as the areas are denuded, then erode. Changes in micro topography. Where vegetation is destroyed, the Hill cannot be held together. All these conclusions are from the RCI Study. Why not eliminate features of the OHV project, NOW, that contribute to more visual impact?

(More than) Enough said. Forgive the length and complexity of my comments. This is a complicated project, that can't be addressed in a short public comment.

Of course, a walking site tour into the heart of the riding area — as I have offered to OSAC and BOS more than once — would be a better way to see this with your own eyes.

I have photos that document all the above (most of which have been sent to Open Space and/or CarsonCity Connect) — but seeing is a more effective way to appreciate the issues.

Thank you for listening,

Robyn Orloff

Carson City Citizen and Taxpayer

And Advocate for making the OHV area the best it can be — "balancing the protection of the natural resources and the protection of the recreational opportunities" — per the OHV Management Plan —

step by step all along the way. No problems, only solutions.